

Planning Committee Agenda



To: Councillor Paul Scott (Chair)
Councillor Humayun Kabir (Vice-Chair)
Councillors Jamie Audsley, Sherwan Chowdhury, Luke Clancy,
Bernadette Khan, Jason Perry, Joy Prince, Sue Winborn and Chris Wright

Reserve Members: Jeet Bains, Simon Brew, Richard Chatterjee,
Pat Clouder, Patsy Cummings, Steve Hollands, Shafi Khan, Maggie Mansell
and Manju Shahul-Hameed

A meeting of the **Planning Committee** which you are hereby summoned to attend,
will be held on **Thursday, 30 November 2017** at **5.30 pm** in **Council Chamber,
Town Hall, Katharine Street, Croydon CR0 1NX**

JACQUELINE HARRIS-BAKER
Director of Law and Monitoring Officer
London Borough of Croydon
Bernard Weatherill House
8 Mint Walk, Croydon CR0 1EA

Margot Rohan
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www.croydon.gov.uk/meetings
Tuesday, 21 November 2017

Members of the public are welcome to attend this meeting.
If you require any assistance, please contact Margot Rohan as above.
To register a request to speak, please either e-mail
Planning.Speakers@croydon.gov.uk or call MARGOT ROHAN by 4pm on the
Tuesday before the meeting.

THIS MEETING WILL BE WEBCAST LIVE - Click on link to view:
<https://croydon.public-i.tv/core/portal/home>

N.B This meeting will be paperless. The agenda can be accessed online at
www.croydon.gov.uk/meetings

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 7 - 12)

To approve the minutes of the meeting held on 14 November 2017 as an accurate record.

3. Disclosure of Interest

In accordance with the Council's Code of Conduct and the statutory provisions of the Localism Act, Members and co-opted Members of the Council are reminded that it is a requirement to register disclosable pecuniary interests (DPIs) and gifts and hospitality to the value of which exceeds £50 or multiple gifts and/or instances of hospitality with a cumulative value of £50 or more when received from a single donor within a rolling twelve month period. In addition, Members and co-opted Members are reminded that unless their disclosable pecuniary interest is registered on the register of interests or is the subject of a pending notification to the Monitoring Officer, they are required to disclose those disclosable pecuniary interests at the meeting. This should be done by completing the Disclosure of Interest form and handing it to the Democratic Services representative at the start of the meeting. The Chair will then invite Members to make their disclosure orally at the commencement of Agenda item 3. Completed disclosure forms will be provided to the Monitoring Officer for inclusion on the Register of Members' Interests.

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 13 - 14)

To receive the following presentations on a proposed development:

5.1 17/00054/PRE Car Park, Lion Green Road, Coulsdon CR5 2NL (Pages 15 - 44)

Provision of 80 residential units with a mix of flats and houses. Provision of public car parking for short term stay

17/02536/PRE CALAT Centre, Malcolm Road, Coulsdon CR5 2DB
Creating a new community hub, including library and community centre and residential dwellings and associated parking

17/02589/PRE Coulsdon Community Centre, Chipstead Valley, Coulsdon CR5 3BE

Demolition of existing building and redevelopment for residential units to provide 22 3-bed houses and 3 2-bed bungalows

Ward: Coulsdon West

5.2 17/05566/PRE Council Staff Car Park, Wandle Road, Croydon CR0 1DX (Pages 45 - 58)

Residential redevelopment to provide a part 25 storey part 5 storey block of predominantly residential (approximately 130 flats) with some flexible office/retail space (approximately 950m²) with associated landscaping and car parking

Ward: Fairfield

6. Planning applications for decision (Pages 59 - 62)

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

6.1 17/04306/FUL 51 Selcroft Road, Purley CR8 1AJ (Pages 63 - 78)

Demolition of existing building: erection of two storey building with accommodation in roofspace and basement comprising 2 one bedroom, 4 two bedroom and 1 three bedroom flats: provision of associated parking and landscaping

Ward: Purley

Recommendation: Grant permission

6.2 17/04385/FUL 96A Riddlesdown Road, Purley CR8 1DD (Pages 79 - 92)

Demolition of one existing building: erection of a two storey building including basement and with additional accommodation in roofspace comprising of 5 x two bedroom flats and 3 x three bedroom flats: formation of associated access, and provision of 8 parking spaces, cycle storage and refuse store

Ward: Purley

Recommendation: Grant permission

6.3 17/04201/FUL Former Essex House, George Street, Croydon CR0 1PJ (Pages 93 - 132)

Redevelopment of the site to provide a part 38 and part 44 storey building with 546 residential flats, with the ground floor to incorporate a flexible space including retail (Class A1), cafe (Class A3), business space (Class B1) and gallery space (Class D1) uses with basement accommodating 28 disabled parking spaces, cycle storage and refuse storage, and associated hard and soft landscaping

Ward: Fairfield

Recommendation: Grant permission

**6.4 17/03851/FUL 177 Chipstead Valley Road, Coulsdon CR5
3BR (Pages 133 - 144)**

Demolition of the existing bungalow; erection of a two storey development with roof accommodation comprising 3 two bedroom, 2 one bedroom and 1 three bedroom flats; provision of three parking spaces; cycle parking and refuse storage; and external amenity space
Ward: Coulsdon West
Recommendation: Grant permission

**6.5 17/03208/FUL 49-51 Beulah Hill, Upper Norwood, London
SE19 3DS (Pages 145 - 174)**

Demolition of two existing buildings: erection of a part 6, part 7 storey building (Block A) and part 4, part 5 and part 6 storey building (Block B) comprising a total of 30 flats (5 x 1-bedroom; 17 x 2- bedroom; 6 x 3-bedroom; and 2 x 4- bedroom flats) and a 2-storey building (Block C) comprising 3 x 3-bedroom townhouses with the provision of 17 car parking spaces (including wheelchair accessible parking), 60 cycle parking spaces, refuse and recycling area, associated landscaped communal amenity areas and formation of vehicular access
Ward: Upper Norwood
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

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

There are none.

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 of held on Tuesday, 14 November 2017 at 6.30 pm in Council Chamber, Town Hall, Katharine Street, Croydon CR0 1NX

MINUTES

Present: Councillor Paul Scott (Chair);
Councillor Humayun Kabir (Vice-Chair);
Councillors Jamie Audsley, Bernadette Khan, Jason Perry, Joy Prince,
Wayne Trakas-Lawlor, Sue Winborn, Chris Wright and Richard Chatterjee

Also Present: None

Apologies: Councillor Luke Clancy

PART A

A184/17 **Minutes of Previous Meeting**

RESOLVED that the minutes of the meeting held on 2 November 2017 be signed as a correct record.

A185/17 **Disclosure of Interest**

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

A186/17 **Urgent Business (if any)**

There was none.

A187/17 **Development presentations**

There were none.

A188/17 **Planning applications for decision**

A189/17 **16/05418/OUT Whitgift Shopping Centre and Surrounding Land, Croydon, CR0 1LP**

A planning officer gave a presentation, after which the Committee Members were invited to look at a model of the development.

Members then asked a number of technical questions and officers responded:

- What will the name be? No name has been agreed yet.
- Car park access – how will it work? There is a single car park across the top of the development and both entrances can be accessed for entering or exiting. Traffic coming from the north will be able to enter

the northern access and traffic exiting from the northern access will exit in a northbound direction. Traffic coming from the south will enter the car park at the southern entrance and exit in a southerly direction. For traffic coming from the south and travelling in a northbound direction, there is a failsafe to prevent queues, so traffic would be able to access the northern access point on an intermittent basis. This would be controlled by the car park management plan.

- Is the residential amenity strip across the top of the car park? It is and will be accessible from the towers.
- Poplar Walk - only one way in or are there plans to change the one way aspect? There are no proposals to change it from one way. The basement is a possible location for residential parking but disabled spaces could be provided in the main retail car park.
- Will there be more to the leisure offer? The application does not say there will definitely be a cinema. The leisure floor space could be for other uses. Whether proposed uses are acceptable would be for the Committee to decide. They would be approved on the basis of use class. That level of detail will come forward in reserved matters. There is a separate regime for uses such as casinos, (which is a sui generis use and does not fall within the uses proposed by the application), which means it would also be dealt with by Licensing if such a proposal were to come forward.
- How are the parameter issues managed and determined? In some places minimums and maximums make a big difference. This would be covered under reserved matters.
- Control around 24 hour access - with a covered street, how will this be controlled? Does the Council have total control or could the developer come back and ask to secure the entrances and remove 24 hr use? The conditions ensure 24 hour use. The developer would need to bring back a further application to change this which would be resisted.
- Use of the galleria - could people sit there for 24 hrs? The conditions require estate management plan, which the Council would approve. The developer would probably have security provision. Licensing restrictions would cover alcohol consumption.
- What opportunities are there within the Section 106 agreement? The uses are specified. Some are financial and some not. For example:
 - TV mitigation; restriction on parking permits; ensuring the quality of architects; public realm - requiring highways agreement, including the pedestrian route through store A; min 20% affordable units; transport - highway works; car club contribution; disabled badge parking; £2.5m for employment and training strategy - job brokerage for construction period and initial operational period; air quality mitigation measures; reducing carbon emissions; commitment that, if the site is demolished and the development does not proceed, there is a commuted sum for public realm improvements.

Children's play space for shoppers could be included within the conditions regarding internal use of spaces. Officers can take this on board and push the developer towards a child friendly environment in reserved matters.

- Where are the affordable homes located and can it come forward in the same proportions? We do not have specific details about the affordable housing. It could be pepper potted throughout the scheme. How it is brought forward can be secured through the Section 106 agreement and through the reserved matters applications.
- Could the affordable housing percentage be increased? 15% is the bare minimum in the opportunity area (with review mechanisms). Officers have worked hard with the developer to secure 20% deliverable. The GLA requires a series of review mechanisms, so it is possible it could increase, but this would be capped at 50% in line with policy. However we need to get the Section 106 resolved, which is time consuming. To sort out review mechanisms would extend this time and there is a deadline of September 2018 to complete the Compulsory Purchase Order.
- In terms of the London living rent, what is the % of market rent? Currently overall it is about 66% (but the percentages are different for different sizes of units).
- Is the affordable housing to rent in perpetuity? This is covered in the Section 106 agreement and they would be affordable in perpetuity.
- Disappointing only 5% of the units are 3-bed. This number is in compliance with the level required in the retail core, as specified in the OAPF (Opportunity Area Planning Framework).
- Is there a faith space in the community area? A faith space could fall within this as the type of community floorspace provision has not yet been determined. This detail would be provided in the reserved matters applications.
- Air pollution – with 3000 car parking spaces, how will it be managed? How can we incentivise people not to drive? Funds will be secured to go towards an initiative in the borough. It is an accessible location so there are alternatives not to use cars. The previous consent granted 3500 spaces, so this is a reduction. Car parking is being rationalised across the centre.
- Is there a possibility of a park and ride scheme? There have been discussions about optimising the park and ride in existence. The travel plan will look at ways to incentivise its use.
- What level of electric charging points are there in the parking area? A planning condition requires 5% parking spaces have charging points (and 15% passive provision, which could be upgraded in line with demand).
- Is there a possibility of a cycle hub for storage and riders to shower and have a drink? There is a condition requiring a travel plan and the cycle hub option can be explored.
- Is it possible for individuals to wheel bikes along the east-west route and what about the north-south route? Bikes can be wheeled east-west but there has been no discussion about the north-south route which is more mall-like, for pedestrian use. Wellesley Road and North End run parallel which would be an easier option for cyclists to travel north/south. Cycle parking is proposed (and controlled by planning condition) in and around the development.

- Design of the towers – will they be all the same or a variety of styles? There is no detailed design at this stage but provision for design to be articulated will come forward in reserved matters. The Design Guidelines require difference in the expression of the towers.
- Why hasn't there been a sequential test for retailing? What is the impact on other town centres? The application proposes town centre uses in a town centre location which is in line with policy. There is a small area outside the Primary Shopping Area, but this is included in the area in emerging policy. The approach is consistent with that taken with the 2014 planning permission.

Mr Sean Creighton, a resident of Norbury, spoke in objection, on behalf of a number of Croydon residents. He raised the following concerns:

- Are details sound and do they address the serious issues raised?
- Economic viability - providing reasonably priced homes and jobs for local people is vital and paying London living wage
- The scheme is offering very little benefit to residents
- Moving footfall from North End where it should be
- More imaginative approach would be to spread new homes across the centre and reduce the roof height
- Roof space should be for public access
- Major leisure facility should include a swimming pool and dance hall – do not need another cinema
- Impact on TV reception - will Section 106 provide for developers paying the cost of mitigation measures which could be more expensive than in the opportunity area?
- Psychological impact during building leading to increased crime and disillusionment
- Suggested rejection, deferral with reasons or approval with reserve matters to be considered by committee

Mr John Burton from Croydon Limited Partnership spoke on behalf of the applicant and made the following points:

- This scheme has increased affordable housing
- Rise of digital opportunities – vital to keep abreast of current trends
- Shopping centres which have failed to invest have become redundant
- Substantial changes to suit the next generation which is more interested in experiences
- The scheme should be measured by its ability to attract large scale investment to Croydon
- Career opportunities with 7,000 new jobs
- Reflecting a community which values its assets
- Lot to be done within next 12 months
- Cross-party support

The Director of Planning & Strategic Transport stressed that the entire block is a huge and significant development. Consideration should be given to the previous consent and the CPO enquiry. There have been some objections and negative impact but the public benefit outweighs them. There are

significant controls within the parameter consent. Play space is covered by the design which provide a commitment for this. The Place Review Panel will further scrutinise it. Public benefits include significant regeneration benefits, social improvements and a catalytic effect on the wider town centre. The development will provide confidence for other developments in Croydon. Working in partnership with the GLA, the development will provide up to 967 new homes (20% affordable), 2 new department stores, leisure space and a £1.4 billion investment.

The Members then debated and commented as follows:

- Several thousand new jobs will incentivise further regeneration of the town centre.
- Outline applications are somewhat frustrating but this is a major scheme and will make a huge difference to residents of Croydon.
- There is a need to balance the impact on heritage assets.
- Almost 1,000 new homes are welcomed.
- Preference for a single phase rather than being drawn out over several phases
- Delivery of the 24 hour east-west link via a galleria will be very positive.
- Public scrutiny must continue with reserved matters coming back to Committee.
- Student accommodation is welcomed and will add to the vitality of the town.
- This is a second chance for a scheme with potential to put Croydon back on the map, to be a destination shopping centre.
- The increased public realm will be beneficial.
- This is an archaeological site, so there is a need to ensure it is surveyed before digging commences.
- TfL comments indicate a massive strain on public transport when completed, particularly buses, trams and West Croydon station.
- A lot of office space is being lost - office use adds to the retail.
- Play area and need for water features – with colour and music, so children can be entertained
- Swift nests requested.
- Park and ride – possibility of linking in with surrounding boroughs.
- Training will be an important element – fulfilling the aspirations of the young
- Approval must not be regarded as carte blanche - we must insist on quality.

Having considered the officer's report and addendum, Councillor Humayun Kabir proposed and Councillor Jason Perry seconded the officer's recommendation and the Committee voted unanimously in favour (10), so planning permission was **GRANTED** for development at Whitgift Shopping Centre and surrounding land, Croydon CR0 1LP, with a requirement for reserved matters to be brought back for consideration by the Committee; that there should be nesting boxes as part of the biodiversity provision and that, in pre-application discussions with the developer, officers should seek play

space within the shopping centre itself and encourage water features/fountains.

A190/17 Other planning matters

There were none.

A191/17 Items referred by Planning Sub-Committee

There were none.

The meeting ended at 8.39 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.

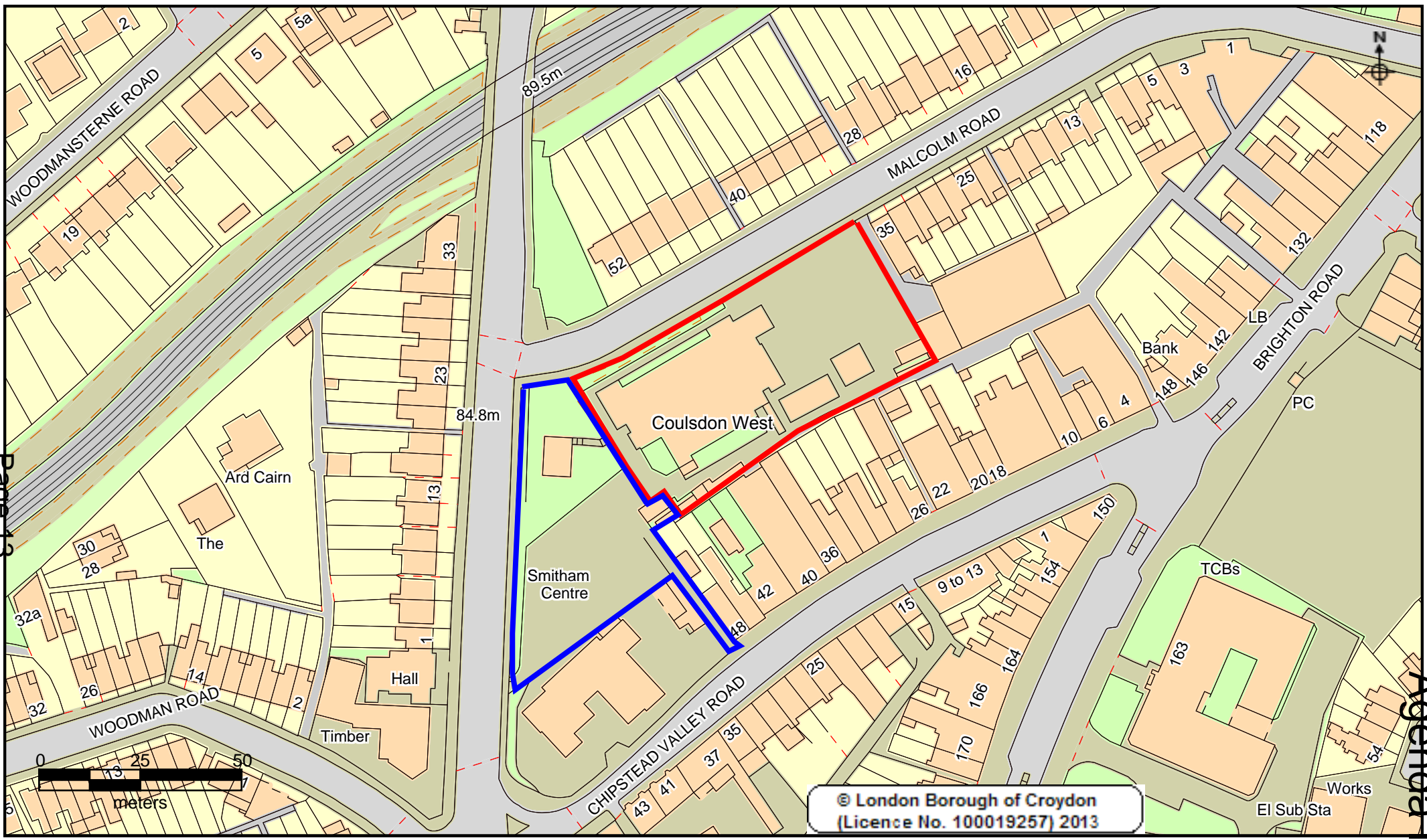
5 BACKGROUND DOCUMENTS

- 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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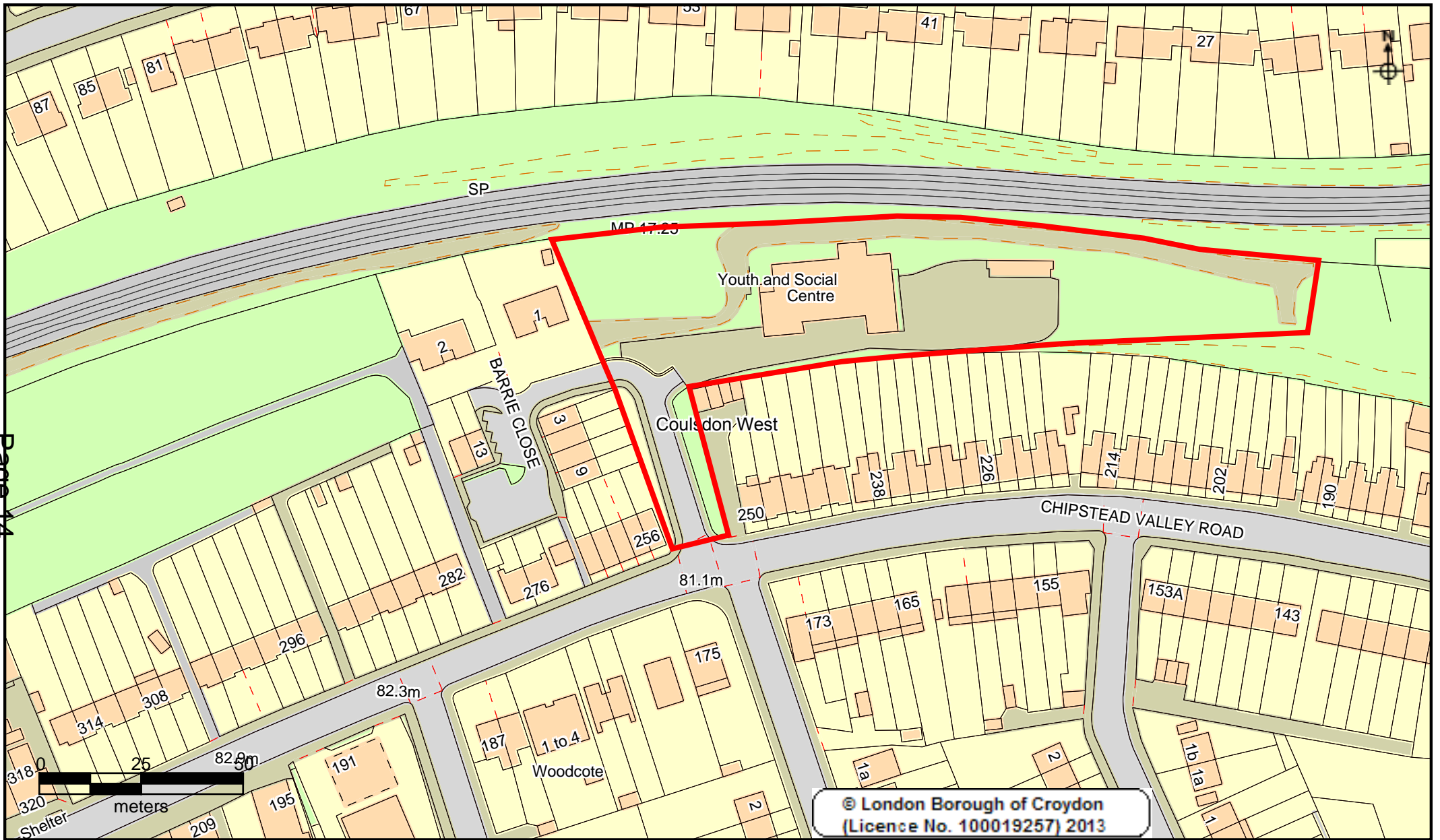
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PART 5: Development Presentations

Item 5.1

1. DETAILS OF DEVELOPMENTS

ITEM 5.1 (a)

Ref: 17/02536/PRE
 Location: Former Croydon Adult Learning and Training (CALAT) Centre, 41 Malcolm Road Coulsdon CR5 2DB
 Ward: Coulsdon West
 Description: Creation of a new community hub consisting enhanced community centre with theatre and NHS health facility, together with associated parking.
 Applicant: Minal Goswami – Brick by Brick
 Agent: Jenifer Islip – Carter Jones LLP
 Case Officer: Robert Naylor

	Existing (sqm)	Proposed (sqm)
COMMUNITY USE	1,100	1,275
HEALTH CARE USE	56	1,250
TOTAL	1,156	2,575

Number of car parking spaces	Number of cycle parking spaces
32 (Community use)	Unknown at this time
Unknown at this time healthcare)	Unknown at this time

ITEM 5.1 (b)

Ref: 17/02589/PRE
 Location: Land to the North East of Barrie Close (Coulsdon Community Centre), Coulsdon, Chipstead Valley, Coulsdon CR5 3BE
 Ward: Coulsdon West
 Description: Relocation of existing Coulsdon Community Centre (CCC) to the former CALAT site and redevelopment of the land to provide 33 residential units and associated parking
 Applicant: Minal Goswami – Brick by Brick
 Agent: Jenny Islip – Carter Jonas LLP
 Case Officer: Robert Naylor

	1 bed	2 bed	3 bed	TOTAL	%
AFFORDABLE	2 (AR)	6 (AR)	0 (AR)	8	24%
	2 (SO)	6 (SO)	0 (SO)	8	24%
PRIVATE	0	0	17	17	52%
TOTAL	4	12	17	33	
FAMILY UNITS	12%	36%	52%		

Number of car parking spaces	Number of cycle parking spaces
48 residential car parking spaces	Unknown at this time

ITEM 5.1 (c)

Ref: 17/00054/PRE
 Location: Land at Lion Green Road Car Park, Coulsdon CR5 2NL
 Ward: Coulsdon West
 Description: Erection of 157 residential units consisting five individual sculpted pavilions sitting within a landscaped area with 52 residential car parking spaces, 100 space public car park, cycle stores, refuse stores, landscaping and public realm works, access and other associated works.
 Applicant: Minal Goswami – Brick by Brick
 Agent: Peter Twemlow – DP9
 Case Officer: Robert Naylor

	1 bed	2 bed	3 bed	TOTAL	%
AFFORDABLE	16 (AR)	11 (AR)	6 (AR)	33	21%
	26 (SO)	13 (SO)	7 (SO)	46	29%
PRIVATE	47	20	11	78	50%
TOTAL	89	43	24	157	
FAMILY UNITS	57%	27%	15%		

Number of car parking spaces	Number of cycle parking spaces
100 public car parking spaces	Unknown at this time
52 residential car parking spaces	

2. INTRODUCTION, POLICY POSITION AND BACKGROUND

- 2.1 The proposed developments are being reported to Planning Committee to enable members of the Committee to view them at an early stage and to comment upon them. The developments do not constitute applications for planning permission and any comments made upon them are provisional and subject to full consideration of any subsequent application and comments received following consultation, publicity and notification. This is the first time that the schemes have been presented to the Planning Committee.
- 2.2 The three sites form a tranche of pre-applications within Coulsdon which are interlinked.
- 2.3 Item 5.1 (a) is a proposal for the former CALAT site at 41 Malcolm Road which comprises the partial demolition of the existing building and the extension and reconfiguration to accommodate the relocated Coulsdon Community Centre (CCC), including the provision of a new theatre hall and a new building at the southern end of the site for a dedicated NHS facility. The health-care facility would be provided in lieu of the emerging site designation related to the linked scheme at Lion Green Road.
- 2.4 The key policy issue for this site is retention and provision of community facilities within Coulsdon.

- 2.5 Item 5.1 (b) comprises the proposed redevelopment of the CCC site adjoining Barrie Close to provide 33 residential units.
- 2.6 The key policy issue for this site where loss of community facilities or land is proposed, evidence should be provided to ensure that there is adequate provision for the use elsewhere. Information at this stage indicates that subject to the provision of the theatre at the former CALAT site, there would be adequate provision for the relocated community facilities from the CCC site potentially allowing a residential re-development of the current CCC site and maintenance of overall community facilities for Coulsdon.
- 2.7 Finally, Item 5.1 (c) deals with the proposed redevelopment of the Lion Green Road site, which is the largest of the three sites, involving the erection of 157 residential units with associated car parking, together with a 100 space public car park.
- 2.8 The key policy issue for this site is the designated within the local plan for a mix of uses, including leisure, car parking and community facilities (No: 372). The residential use, together with public car park, can be justified through provision of community use on the former CALAT site, which would be in the form of a dedicated NHS facility.
- 2.9 Therefore, the sites are reliant on each other to a certain extent, to allow the policy position to be resolved across the three sites. Consequently, it is necessary for all three applications to be submitted, considered and determined at the same time, with a legal agreement provided to ensure all aspects are delivered and controlled through the town planning process.
- 2.10 The report will highlight issues that are tranche wide and then move on to issues that affect each site individually. As such the report will read as follows:

Section 1:	Details of developments
Section 2:	Introduction, policy position and background
Section 3:	Tranche wide material planning considerations
Section 4:	Item 5.1 (a) Former CALAT
Section 5:	Item 5.1 (b) Coulsdon Community Centre
Section 6:	Item 5.1 (c) Lion Green Road
Section 7:	Relevant planning policy and guidance

3. TRANCHE WIDE MATERIAL PLANNING CONSIDERATIONS

- 3.1 The main planning issues raised by all three developments that the Committee should be aware of are:
- Principle of the proposed development and future uses
 - Phasing
 - Affordable housing, tenure and mix
 - The impact on highway and parking conditions
 - Impacts on trees
 - Flooding implications

- Accessibility
- Sustainability
- Environmental impact
- Mitigation

Principle of the Proposed Development and Future Uses

- 3.2 Given the location of the three sites and their relationship to the Coulsdon District Centre, under the current policy and the emerging policy, an increase in residential development is generally supported along with the active encouragement of community uses and the provision of adequate public car parking for Coulsdon. On a tranche wide basis, these objectives can be achieved through the provision of a community hub at the former CALAT site, with CCC site providing residential accommodation alongside the Lion Green Road site which will also re-provide the required public car parking facility.
- 3.3 The former CALAT site has been identified as a community hub and subject to the provision of a new theatre facility, the site would be able to accommodate the existing uses from the CCC.
- 3.4 The southern section of the CALAT site (fronting Woodcote Grove Road) has been identified as a healthcare facility and NHS have expressed an interest in a purpose-built unit at this location, although precise details are unclear at this time. The NHS element would be likely to form an outline element of a future “hybrid” planning application for the CALAT site. A subsequent application for reserved matters for the health related facilities would be need to be submitted at a later date, once further details are released by the NHS and associated health providers.
- 3.5 The applicants will need to provide a robust and clear indication that the proposed uses can be accommodated at the former CALAT site and whether there would be any additional space that could be utilised for any potential future community use facilities coming forward. This should also include information in respect to the relocation of the Zodiac gymnastics club and the re-provision of other existing CALAT uses.
- 3.6 Assuming this position can be resolved, both the CCC and Lion Green Road sites should be able to maximise their residential redevelopment potential which is currently proposed at 33 and 157 units respectively (190 total). This is considered to be a reasonable and realistic development density for Coulsdon.
- 3.7 The continued use of the site for public car parking at the Lion Green Road site is a high priority for business and residents within Coulsdon. Consequently, the Lion Green Road proposals currently incorporate public parking, currently showing circa 100 spaces. Further analysis is required around levels of use of the public car park to suitably justify the level of re-provision.
- 3.8 Overall, the provision of community hub at the former CALAT site would be acceptable and in line with the objectives current and emerging policy. This would enable the CCC and Lion Green Road sites to be redeveloped for residential

purposes along with the re-provision of public car parking on the Lion Green Road site. Overall, the approach adopted (tranche-wide) would be acceptable and in line with the objectives for the Coulsdon District Centre and no objection is raised in principle to the development, subject to the other material considerations.

Phasing

- 3.9 In terms of delivery, the tranche needs to be clear on phasing to ensure that the required uses above are provided and re-provided sequentially to mitigate loss of community uses and facilities and ensure that the development is delivered in a suitable manner. As such, the re-provision of the community uses from the CCC site will need to be secured at the former CALAT site first, before any works can be commenced on the residential works to CCC site. Furthermore, the private residential units proposed for the CCC site could not be occupied until such time as the affordable housing has been made available.
- 3.10 Whilst works could commence at the Lion Green Road site, alongside the works at the former CALAT site, there would also need to be a restriction on private occupation of residential units until affordable housing has been delivered. The NHS health related facilities would need to be safeguarded in some shape or form and ideally, provided prior to the completion of the Lion Green Road site. It is therefore clearly important that the NHS proactively engages in the process and provides clear guidance as to how these facilities will be delivered (including timetabling parameters). This could be secured through a S106 Agreement ensuring (ideally) that the NHS facility should be commenced prior to the completion of the final private block at Lion Green Road.
- 3.11 The ideal approach to phasing would be as follows:
- Phase 1: Re-providing the CCC community use at the former CALAT site
 - Phase 2: Provision of the affordable housing at the Lion Green Road site
 - Phase 3: Provision of residential units at CCC with the affordable delivery first
 - Phase 4: Provision of the new NHS healthcare facility at former CALAT site prior to completion of Lion Green Road

Affordable Housing, Tenure and Mix

- 3.12 The current policy set out that a minimum of 50% of units must be secured as affordable housing on sites of ten or more units. Any provision of less than 50% must be justified through a robust viability process.
- 3.13 Under emerging policy (which is likely to be adopted come determination of these 3 schemes) the Council seeks to achieve a 50% on-site provision for affordable units with a 60:40 (affordable rent: shared ownership) split. The new policy requirement also states that there is a minimum requirement of affordable housing to be provided either as:
- 30% affordable housing on the same site as the proposed development; or

- 15% affordable housing on the same site as the proposed development plus a Review Mechanism to capture any further 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 there is no suitable donor site.
- Anything offered below any of these requirements would be refused.

3.14 This policy is being reviewed through the partial review of CLP1 (CLP1.1). The Local Plan Inspector has introduced main modifications to the policy, which do not alter the approach of the policy but does mean that only moderate weight (at this stage) can be afforded to the emerging policy landscape.

3.15 There are no residential units provided at the former CALAT site as this will provide the community hub. In terms of the tranche, the developments would provide 190 units across the sites with a provision of 50% affordable units in a 43:57 split between affordable rent and shared ownership. This has been highlighted in the table below:

	Affordable Rent	Shared Ownership	Private Market	TOTAL	%
Former CALAT site	0	0	0	0	0
CCC site	8	8	17	33	18%
Lion Green Road site	33	46	78	157	82%
TOTAL	41	54	95	190	
%	22%	28%	50%		

3.16 The tranche (in terms of affordable housing delivery) seeks to deliver a policy compliant 50% affordable housing figure and Members need to consider whether this provision is suitable, given that the tenure mix is below a policy compliant 60:40 split.

3.17 The viability has been assessed by an independent viability advisor (at a relatively high level and on the basis of the viability information submitted) who has indicated that the amount of affordable housing being proposed constitutes the maximum reasonable level – especially as the sites/schemes are required to assist in the relocation or provision of community and health related facilities. Further justification of the affordable housing is covered on a case by case basis.

3.18 Policy further seeks to secure the provision of family housing and has an aspiration for 60% of all new homes outside the Croydon Opportunity Area to have three or more bedrooms. It also allows for a proportion of those three bedroom homes to be provided as 2B4P dwellings in the first 3 years of the Plan. The current mix of units as stated as a tranche is highlighted in the table below:

	1B2P	2B3P	2B4P	3B5P	TOTAL	%
Former CALAT site	0	0	0	0	0	0
CCC site	4	4	8	17	33	18%
Lion Green Road site	96	20	22	19	157	82%
TOTAL	100	24	30	36	190	
%	52%	13%	16%	19%		

3.19 When taken as a tranche of the three Coulsdon sites, the figure for family units of 2B4P dwellings and 3B5P dwellings would be 35% which would not be policy compliant. Again, Members need to consider whether this provision is suitable given that the figure is below a policy compliant 60% figure. This again will be explained further on a case by case basis below.

The Impact on Highway and Parking Conditions

3.20 To date, none of the schemes to date have provided sufficient details in respect of the transport and parking arrangements and as such, the full applications will need to be supported by Transport Assessments including parking surveys undertaken in line with the Lambeth methodology with other documents including a Travel Plan, Delivery Service Plan, Waste Management Plan and Construction Logistics Plan.

3.21 Consideration would need to be given to parking, traffic and highway implications of all the schemes together and should would also need to have regard to the effects of the Cane Hill development – in terms of traffic generation and junction capacity. There is a need to assess the implications of the developments collectively on the Coulsdon area, to ensure that the local networks can adequately cope with the increase in the number being proposed.

3.22 The Transport Assessments would need to include estimating the trip generation. The TRICS database should be used to compare similar sites to justify reducing congestion and overspill of parking onto the surrounding highway network.

3.23 Details of Green Travel Plans; servicing; refuse; recycling; pedestrian routes and cycle parking and facilities will need to be supplied as part of any application. Also, there must be a provision of at least 10% for disabled parking across the developments; Travel Plan and car club provision on site; and electric car parking points provided on site. The car club bays must have full public access to be commercially viable).

Impacts on Trees

3.24 Each of the three sites incorporates tree coverage and landscape settings and the general vision is to retain as many trees at the site as possible. Trees must be considered now and discussed as part of the pre-application discussions as a number across the sites are considered to be of significant value and it will not

be possible to maximise the development potential of these sites without some difficult decisions having to be taken.

- 3.25 Tree surveys are required as part of any application and this must include tree protection measures.

Flooding Implications

- 3.26 For each site, a Flood Risk Assessment (FRA) would be required. FRAs should be proportionate to the development and risk and should address all relevant sources of flooding, including sequential test where required.
- 3.27 In view of the proposed scale of development, the Lead Local Flood Authority (LLFA) has indicated that any submission must include a Drainage Strategy or Flood Risk Assessment with Drainage Strategy in order to be validated.
- 3.28 In accordance with Croydon Strategic Policy SP6.4, the FRA should meet the requirements of a site-specific FRA as outlined in paragraph 030 and 031 of the Planning Practice Guidance. Applicants should ensure they have consulted all available flood risk information including the Croydon Strategic Flood Risk Assessment, Surface Water Management Plan, Local Flood Risk Management Strategy and any local Flood Investigation Reports.

Accessibility

- 3.29 For the residential parts of the schemes and in accordance with the London Plan 90% of new housing needs to meet Building Regulation requirement M4 (2) 'accessible and adaptable dwellings' and 10% of new housing would need to meet Building Regulation requirement M4 (3) 'wheelchair user dwellings', i.e. is designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users. This would need to be highlighted in any formal applications. Furthermore, the new buildings should require level access which should be incorporated in the design along with 10% of the parking spaces being made available as disabled bays.

Sustainability

- 3.30 New development should make the fullest contribution to minimising carbon dioxide emissions and should incorporate on site renewable energy generation. New dwellings need to achieve 'zero carbon' which sets a minimum level of CO2 reduction that must be achieved by on-site measures, with the remaining emissions then offset via 'Allowable Solutions' off-site. Where sites cannot achieve 'zero carbon' on its own it would help meet developers' CO2 reduction targets up to 2016.
- 3.31 The carbon dioxide reduction targets should be met on-site. Where it is clearly demonstrated that the specific targets cannot be fully achieved on-site, any shortfall may be provided off-site or through a cash in lieu contribution which could be secured through a S106 agreement.

3.32 The schemes should be designed and built to achieve a target of 110 litres or less per head per day. No detailed sustainability strategy has not yet been provided. This prevents officers from being able to make comment on the acceptability of this element of the scheme. The applicant will be required to meet policy requirements for the scheme to be supported.

Environmental Impact

3.33 Given that the Lion Green Road scheme is more than 150 units, this would require an EIA screening opinion to be undertaken, which has now been submitted (Ref: 17/05542/ENVS). At this stage, the scheme would fall under Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) (Amendment) Regulations 2015, where an Environmental Impact Assessment may be required.

3.34 It is considered that because of its nature, the proposal would fall within the description "Urban Development Project" and the applicable threshold for an EIA Schedule 2 (Column 2) indicates where the development includes more than 150 dwellings.

3.35 The screening opinion has yet to be determined.

Mitigation

3.36 Each of the sites are classified as major developments. At this stage it is envisaged that planning obligations will be required to mitigate the development in the form of the following:

- Affordable housing
- Employment and training
- Air quality
- Zero carbon off-setting
- Car club
- Travel Plan
- Transport for London contributions
- Highway works

4. ITEM 5.1 (a) FORMER CALAT SITE

4.1 The main issues for Committee to consider are:

- Whether the proposed facility can adequately accommodate the community uses (the displaced CCC) and whether there is adequate provision for future uses
- Ensuring the healthcare facility (as part of the Lion Green Road site designation) is secured and retained on site
- On-site parking provision and impact on the transport conditions of the surrounding area

- Whether the more modern design would be suitable within the locality and the Coulsdon area.
- The relationship between the new, enhanced community centre building and the proposed NHS building and whether there needs to be pedestrian linkages and shared spaces

Proposal

4.2 The pre-application scheme is split into two distinct elements:

- a) full planning permission for extension and reconfiguration of the existing building to accommodate the relocated CCC, including the provision of a new theatre hall

4.3 This would include the partial demolition of the northeast part of the existing building and the demolition of two smaller timber outbuildings to create additional space to accommodate a theatre building with access via Malcolm Road to the north of the site. The site would accommodate the existing community groups that currently occupy the CCC and has the added capacity to deliver additional and more diverse activities and become accessible to more people. The site currently provides 32 on-site car parking spaces and the proposal will re-provide the 32 spaces.

- b) outline planning permission (reserving landscape and appearance) for a new building to the south west side to be dedicated to NHS facilities.

4.4 This would seek an outline application (for the means of access; layout and the scale) of a new building to the south west of the site for other a dedicated NHS healthcare facility of between circa 1,500 sqm. The actual use for the NHS has yet to be defined in detail, hence appearance will be reserved.

Site and Surroundings

4.5 The pre-application site contains the former CALAT building and whilst the former CALAT use vacated the premises back in 2016, the current building is occupied by the Zodiac Gymnastics Club. The site is situated within Coulsdon District Centre and has boundaries to Malcolm Road to the north, Woodcote Grove Road to the west and has a small access way to the south of the site from Chipstead Valley Road. There are significant hardstanding areas at the site including 32 spaces for the current community use at the eastern end of the site and addition temporary car parking facilities at the western side of the site, accessed via Chipstead Valley Road.

4.6 To the north and west of the site are residential properties. The surrounding area to the south of the site is characterised by a mix of residential and commercial uses, with a wide-ranging degree of heights and appearances, which includes Teddies Nursery – operating from a locally listed building. To the south east is Coulsdon Town Centre including various shops, mostly with residential accommodation above within the Primary Shopping Area and Main Retail

Frontage. The site lies within an area at risk of surface water and critical drainage flooding as identified by the Croydon Flood Maps.

Planning History

- 4.7 There have been two previous permissions involving car parking provision on the western part of the site:
- 15/03700/P - granted in January 2016 for the use as a public car park with access via Woodcote Road. This has been implemented.
 - 15/05673/P - granted in June 2016 for the use as public car park; formation of vehicular and pedestrian access from Woodcote Grove Road and alterations to car park including resurfacing, line marking, lighting and alterations to Chipstead Valley Road access to pedestrian use only, with a Section 106 attached. This has not been implemented, but established the principles of a permanent solution on Woodcote Grove Road.

Material Planning Considerations - CALAT site

- 4.8 The planning issues specific to this development that the Committee should be aware of are:
- Townscape & Design
 - Impacts on highway and parking
 - Impacts on adjoining occupiers
 - Impacts on trees

Townscape and Design

- 4.9 At this point in the pre-application process, the design discussions are on-going. The scheme has been presented to the Place Review Panel (PRP) who generally supported the refurbishment of the existing CALAT building and the addition of a new theatre extension. Although further work is required, specifically in respect to the location, orientation and integration with the existing historic building, officers are broadly content that the pre-application process is working well (subject to detailed comments below) with the emerging proposals likely to relate comfortably to the retained buildings (which are considered to be non-designated heritage assets) and the wider area and should result in an appropriate response to the site and its constraints.

Full application element

- 4.10 There are some concerns that the theatre box seems very prominent at this stage and more work is required to provide certainty that the quality of materials and detailing employed to create the intended illuminated “beacon” will translate through all stages of delivery of this project. This proposed theatre space should be as multi-functional as possible, in order to accommodate the range of community uses that already exist but also to ensure the long-term sustainability of the site. The scheme provides an excellent opportunity to create a community

hub and officers have encouraged the applicant to think carefully about the specificity of the theatre function versus long term flexibility and sustainability of the venue as a community facility for Coulsdon.

- 4.11 The materials will need to be of a high quality and the concept of the beacon would need to be fully committed to and included in the client's cost plan as any compromise on this element could result in a very prominent, solid, blank mass, which would not be acceptable.
- 4.12 Further exploration if required in respect to the junctions between the old and the new elements of the scheme. The articulation of the secondary mass of the extension should either have a flat-roofed contemporary form (consistent with the architecture of the "beacon") or a form that more closely reflected the proportions and forms of the architecture of the existing building would be more successful. Officers support the ambition that the theatre should have character that relates to the host building and contributes positively to its context as a civic building
- 4.13 It is noted that a landscape architect has now been appointed and officers have encouraged the applicant to consider the character and function of the spaces surrounding the buildings and how these could be programmed at different times, including potentially for theatre uses.

Outline application element (NHS facility)

- 4.14 It is acknowledged that there is less certainty in respect to the outline scheme for the proposed health facility at the south west section of the site. Nevertheless, officers are broadly supportive of the location and footprint and have requested further analysis to help assess height and mass.
- 4.15 Officers believe that it would be most preferable for the design of the NHS Centre to be integrated with and developed simultaneously to the design for the theatre and the designs for CCC.
- 4.16 Officers have asked that a series of sketch views be worked up and provided to help understand how the proposed block would sit in its context. The scheme should reflect the surrounding heights and should be respectful of the theatre site (which is lower) given that the stated intention is that the proposed theatre 'beacon' be prominent as a civic feature in the surrounding townscape.
- 4.17 Given that the NHS requirements have yet to be confirmed in any detail, it is considered prudent at this time to reserve the appearance of the building. However, the access and orientation of the building would assist decision-making at this stage. Officers have advised that there should be a degree of breathing space between this building and the surrounding historic buildings and that the spaces between buildings should be considered as part of an overall landscape strategy. There are concerns that there is a lack of integration across the site and more links between the sites should be included.

- 4.18 Overall, the scheme to provide a community hub at the location is supported and while the scheme is developing well from a design perspective, there are still areas that need to be progressed further.

Impact on Highways and Parking

- 4.19 There is a specific requirement that the existing car parking levels are maintained. The applicants have indicated that initial parking surveys have been undertaken and these have highlighted that the proposed uses could be accommodated on site, utilising the existing parking provision and there would not be any loss of the existing parking spaces associated with the community facility. As stated above, impacts on the junctions should be considered holistically and account for each scheme to ensure that any impacts on the transport network are minimal and that there is adequate provision on site for the servicing arrangements.
- 4.20 In terms of the outline scheme on the new NHS facility fronting Woodcote Grove Road, the use of the previous approved access should be utilised (left in and left out) and servicing arrangement for the new build will require further consideration (ambulance/minibus requirements). Whilst it is acknowledged that the applicants are unsure of the exact requirements of the NHS at this time, further information is required, particularly in terms of servicing arrangements given that the outline scheme would be seeking to approve the access arrangements.

Impact on Adjoining Occupiers

- 4.21 As the scheme progress, detailed assessment will be needed to demonstrate that the proposal would not have any adverse impact on existing neighbouring uses. In terms of overlooking and visual impacts, the applicants should have regard to the relationships with commercial uses in Chipstead Valley Road and the residential units in Woodcote Grove Road and Malcolm Road.

Impacts on Trees

- 4.22 There are mature trees on the boundaries of the site, particularly along Woodcote Grove Road which, whilst not protected (through use of TPO) they do have amenity value within the area and should be retained. Currently the details provided at this pre-application stage appear to demonstrate that this is the case. However, the arboriculture team have requested that a tree survey be included as part of any application and that tree protection measures are included given that there is a change in the land levels at the site.

5. ITEM 5.1 (b) COULSDON COMMUNITY CENTRE SITE

- 5.1 The main issues for Committee to consider are:

- Provision of 48% affordable housing proposed
- Affordable tenure split of 8 affordable rent: 8 shared ownership (50:50)
- Is it about number of affordable units or tenure?
- 75% of family units

- On-site parking provision and impact on the transport conditions of the surrounding area
- Whether the design of the units would be acceptable as regards the location and the surrounding area.
- Orientation and access to daylight and sunlight for the residential units
- How the design deals with the land level changes
- Potential impact on valued trees

Proposal

- 5.2 The proposal is for the redevelopment of the site. The existing building would be demolished with the community facilities offered by the CCC relocated to the former CALAT site. 33 residential units are proposed.
- 5.3 Given the linear nature of the site, the scheme would provide a main terrace of 17 family dwelling houses over two storeys with accommodation in the roof-space. There would be integral garages to 13 of units and 35 spaces provided externally.
- 5.4 The terrace would have two flatted elements; at the eastern and western ends of the site, with a service road to the south and additional parking located along this side boundary adjoining the rear gardens of Chipstead Valley Road.
- 5.5 The scheme has been designed to sit within the existing topography and utilise the slope of the railway to the rear as far as possible.

Site and Surroundings

- 5.6 The pre-application is located on the eastern side of Barrie Close and is currently occupied by the CCC which is accessed via Barrie Close and sits to the rear of the properties fronting Chipstead Valley Road to the south of the site and bounded by the railway line to the north. The site has many mature trees, although none of these are protected through use of TPOs. However, they are well established and are of high amenity value. The PTAL rating of the site is 2 and Chipstead Valley Road is a local distributor road.
- 5.7 The site is not subject to any designations in Proposals Map in either the operative Croydon Local Plan or the emerging documentation. However, the site is in current use as a community centre (which is well used and valued locally) and there is a clear requirement to re-provide this facility as part of this development. The local planning authority would need to satisfy itself that re-provision is both deliverable and fully realised.

Planning History

- 5.8 There is only limited relevant planning history associated with this site which is as follows:
- 93/01732/P - Siting of container for storage purposes. Permission Granted: 17 November 1993

- 98/02320/P - Extension of existing carpark; re-location of existing gates and railings. Permission Granted: 4th November 1998

Material Planning Considerations specific to Coulsdon Community Centre

5.9 The planning issues specific to this development that the Committee should be aware of are:

- Affordable housing, tenure and mix
- Townscape & Design
- Impacts on highway and parking
- Impacts on trees
- Impacts on adjoining occupiers
- Other planning matters

Affordable Housing, Tenure and Mix

5.10 The applicants have advised that based on their initial viability assessment, the CCC site can support 48% affordable housing provision (16 units) albeit with a 50:50 mix between the affordable rented and shared ownership products.

5.11 In terms of the mix of the family units again the scheme would be compliant with 25 of the 33 units (75%) being 2B4P units or larger.

5.12 The viability has been assessed by an independent viability advisor (at a relatively high level and on the basis of the viability information submitted) who has indicated that the amount of affordable housing being proposed constitutes the maximum reasonable level – especially as the site is expected to re-provide community related facilities elsewhere. Further sensitivity testing has been undertaken, which assumes a 60:40 policy compliant affordable housing tenure mix, which has concluded that the policy minimum (30% affordable at 60:40 split) would be viable (with contributions available to deliver replacement community facilities). Therefore, officers are satisfied that delivering a significantly higher quantum of affordable housing (albeit and a slightly different mix) represents a sound affordable housing offer in line with policy advice and secures an appropriate balance between quantum of affordable housing and overall levels of affordability.

5.13 Whilst Members will need to form a view in respect the acceptability of the tenure mix, officers are satisfied that engagement on the quantum and form of affordable housing is progressing well.

Townscape and Design and Impacts

5.14 The scheme has been presented to the Place Review Panel who considered that there is the potential to provide much needed high quality residential accommodation, although further design development is required. The site has two key qualities; the steep, wooded railway embankment and the views across Coulsdon Valley. The challenges are the sites narrowness, particularly towards the eastern end.

- 5.15 The overall design and massing of the proposal is supported. The aspect and daylighting of the ground floor rooms could be improved and further consideration should be afforded to the use of the ground floor garages as habitable rooms – which would provide natural surveillance to the residential properties and the service road.
- 5.16 It is considered that 3 storeys would be an appropriate maximum height for the properties to avoid the development having an overbearing impact on the surrounding 2 storey context. It is important that only the rooftops of the properties are visible through the trees from the surrounding area to be consistent with local character. The density of the development would also be appropriate to knit positively within the local context.
- 5.17 The wooded railway bank to the north of the site would be both an asset as well as a constraint. The embankment provides high quality visual amenity as well as an interesting environment for future residents including potential for natural play. However, there are issues in respect to additional overshadowing created by the trees which should be retained as far as possible. Access is also challenged in view of the steepness of the terrain and woodland alongside site drainage issues and railway noise affecting residential amenities.
- 5.18 Given the orientation, it is possible the properties could suffer from insufficient daylight and poor visual amenity, given they would be located close to the wooded railway embankment. Retaining walls would be required to create the level patios – which would be the issue towards the eastern end of the site.
- 5.19 As a consequence of the site's orientation the garages would have a better aspect and access to daylight and sunlight than the kitchens within the houses. Most streets of terraced housing in London include on street parking and enable ground floors of homes to provide habitable rooms that overlook the street; this is part of the character of London and is a typology that works. If parking could be accommodated on-street, then this would enable better quality homes and better natural surveillance. A daylight and sunlight assessment would be required with any planning application to confirm the units meet the necessary standards.
- 5.20 The type of saw-tooth roof form proposed for the terrace of housing is not the typical roof-form used for residential buildings in the surrounding area where hipped roofs with gable-ends predominate. This could contribute towards the terrace not integrating successfully to the surrounding townscape context.
- 5.21 It is too early to discuss the material details, although the use of brick is supported. Given the length of the terrace, the use of a single type of brick across the development would be likely to contribute to the potentially monotonous character. A clever use of brick is encouraged to help break up the terrace.
- 5.22 The main challenge of the site is for the residential accommodation to respond positively to the railway embankment to provide high quality aspect from the ground floor rooms and high quality external amenity space, whilst also allowing for necessary vehicular access. The scheme as proposed has not yet responded

adequately to the challenges and opportunities presented by the site and further design development is required.

Impact on Highways and Parking

- 5.23 Whilst the site is in an area with a poor Public Transport Accessibility rating of 2, it is within close walking proximity of bus service routes. The applicant proposes to provide 48 car parking spaces which is general acceptable to Strategic Transport although removal of some of the garages (highlighted above) might well have some implications on the on-site car parking capacity.
- 5.24 The layout of the car parking arrangement includes a turning area catering for larger vehicles. Further evidence, in terms of vehicle tracking and manoeuvres would be required to show that these would be suitable for refuse, emergency, and service/delivery vehicles. Further information is required on who is responsible for managing the parking area or deliveries and whether there be any concierge facilities for residents. Clarity is also required on the capacity of the access to the proposed development.

Impacts on Trees

- 5.25 There is an impressive bank of trees and understorey planting along the northern boundary of this site along the railway embankment. The trees provide a good screen from the railway and offer a good level of visual amenity. There are some concerns surrounding the removal of any of the trees from this group, especially for reasons of development, given their amenity value.
- 5.26 Any formal proposals would need to be accompanied by a full Arboricultural Report. This will need to be weighed in the planning balance when a planning application is submitted.

Impact on Adjoining Occupiers

- 5.27 The main concerns relate to the existing amenity of the residents to the south the site that front Chipstead Valley Road (218-250). The rear of the properties in Chipstead Valley Road are approximately 30m from the proposal. This degree of separation should be maintained should any further application be submitted.
- 5.28 It is unlikely that the scheme would cause any significant additional overlooking or loss of privacy given the separation distance from the neighbouring properties, as this is an urban environment a degree of mutual overlooking should be expected. Thought should be had in terms of mitigating the loss of privacy experienced at these properties, perhaps through landscaping provision.
- 5.29 Daylight/sunlight assessments should be required as part of any submission.

Other Planning Matters

- 5.30 Network Rail would need to be engaged at an early opportunity to determine the degree of construction constraints and any permissions required when constructing so close to the railway embankment.
- 5.31 From a heritage perspective, it is recommended prior to any demolition, a Level 3 Building Survey is undertaken to provide a record of the building's history.
- 5.32 Further details will be required in respect to a land contamination desk report particularly as the site appears to be located on made ground; Noise Assessment and Air Quality Assessment.

6. ITEM 5.1 (c) LION GREEN ROAD CAR PARK SITE

6.1 The main issues for Committee to consider are:

- Provision of 50% affordable housing proposed
- Affordable tenure split of 33 affordable rent: 46 shared ownership (43:57)
- Is it about number of affordable units or tenure?
- 26% of family units
- 98 public car parking spaces for Coulsdon District Centre
- Onsite parking provision and impact on the transport conditions of the surrounding area
- Whether the landscape first design would be suitable within the locality and the Coulsdon area as a whole
- Public versus private spaces in the landscape context
- Impacts on and links to the Scheduled Ancient Monument

Proposal

- 6.2 The proposal is for the redevelopment of the site to provide 157 new residential units.
- 6.3 The units will be in five individual pavilions within a verdant landscape. The project is a landscape first approach, with the five pavilion buildings designed to respond effectively to the sloping topography of the site, with each one rotated to manage the proximity between residents and to offer the benefit of maximised views over the surrounding landscape. All units would be dual aspect, across all tenures. The landscape first approach seeks to create quality shared amenity space surrounding the proposed residential buildings.
- 6.4 52 car parking spaces are proposed for future residents of the development and an improved public realm to Lion Green Road. The scheme has been designed to provide views and access ways into the Scheduled Ancient Monument at the rear of the site. Public car parking is also proposed (circa 100 spaces).

Site and Surroundings

- 6.5 The site is situated to the south west side of Lion Green Road. The site is currently occupied by a Council owned public car park and Sovereign House.

There are several trees within the site. There is a significant change of land levels across the site. The PTAL rating of the site is 3.

- 6.6 To the north-east are small two storey terrace houses, a garage and a recent flatted development on the opposite side of Lion Green Road, at the corner of Brighton Road. Further to the north-east is Coulsdon Town Centre. To the south is an access road to Coulsdon Area Farm and a residential flatted block (Gilbert Court). Further south is the recent development at Cane Hill which is currently under construction for up to 677 units, with Phases 1 – 6 all being built out. To the west is an earth embankment that once formed part of the Surrey Iron Railway, designated a Scheduled Ancient Monument.
- 6.7 Richmond Hall Scout Hut abuts the north-west corner of the site, along with an access road to the two storey properties fronting Chipstead Valley Road. Next to Richmond Hall to the west is Smitham Primary School. On the corner of Chipstead Valley Road is a post office and depot. Well Cottages are situated in Fourth Drive.
- 6.8 The site adjoins Metropolitan Green Belt and Local Open Land which also covers the Surrey Iron Railway-Scheduled Ancient Monument (SAM). Smitham Primary School Playing Fields adjoin the scouts. Well Cottages are located within the Chipstead Valley Road Local Area of Special Character. The site is located within an Archaeological Priority Zone and a Local View. Lion Green Road is a Local Distributor Road. The site is also located within Flood Risk Zones 2 and 3 and within a surface water critical drainage area.
- 6.9 A Tree Preservation Order (TPO), 17 of 1972 covers Sovereign House, Lion Green Road and TPO 25 of 1993 covers trees adjoining the site relating to the Cane Hill site.

Planning History

6.10 The following planning history is relevant:

- (13/02178/P) - granted in July 2014 for the demolition of existing buildings; erection of building comprising retail food store and health facility and new storage building (in connection with existing scouts hall); formation of vehicular access and provision of associated parking. However, this permission has never been implemented and expired in July 2017.
- Cane Hill (13/02527/P) was granted for residential and commercial purposes and the first phases are under construction on site.

Material Planning Considerations specific to the Lion Green Road Site

6.11 The planning issues specific to this development that the Committee should be aware of are:

- Affordable housing, tenure and mix
- Townscape & Design

- Impacts on highway and parking
- Impacts on trees
- Impacts on adjoining occupiers
- Archaeological Priority Zone (APZ)
- Other planning matters

Affordable Housing, Tenure and Mix

- 6.12 The initial viability assessment at Lion Green Road has the maximum affordable housing as 50% of the proposed units (79 units) in a 43:57 mix between the affordable rented and shared ownership products. The intention is to locate the affordable rented units in the block adjoining the Scheduled Ancient Monument (Block B), with two further blocks (Block C and D) reserved for the shared ownership units and the final two blocks (Block A and E) being provided for private sale.
- 6.13 As regards the mix of family units, the current scheme provides a number of smaller units and as such only 41 of the 157 units are 2B4P or larger (26%) which would be significantly lower than the 60% figure for the scheme to be policy compliant.
- 6.14 The viability has been assessed by an independent viability advisor (at a relatively high level and on the basis of the viability information submitted) who has indicated that the amount of affordable housing being proposed constitutes the maximum reasonable level – especially as the site is expected to deliver health related facilities. Further sensitivity testing has been undertaken, which assumes a 60:40 policy compliant affordable housing tenure mix, which has concluded that the policy minimum (30% affordable at 60:40 split) would be viable (with contributions available to deliver related health related facilities). Therefore, officers are satisfied that delivering a significantly higher quantum of affordable housing (albeit and a slightly different mix) represents a sound affordable housing offer in line with policy advice and secures an appropriate balance between quantum of affordable housing and overall levels of affordability.
- 6.15 Whilst Members need to consider whether the provision of a 50% affordable scheme is suitable given that the tenure mix and the family units are below a policy, officers are satisfied that the approach to affordable housing delivery and the level of family accommodation (when taking account of the viability of the scheme overall) is progressing well.

Townscape and Design and impacts on Scheduled Ancient Monument (SAM)

- 6.16 The scheme has been presented to the Place Review Panel (PRP) who were reasonably positive about the overall design concept of the scheme describing the buildings as “jewels within landscape”.
- 6.17 The ‘pavilions in a landscape’ approach is a possible solution when responding to site topography and allowing views and movement through to the SAM.

6.18 The main issues to resolve for the 'landscape first' concept include the following:

- parking, access and play spaces needing to be sensitively incorporated in a way that does not undermine the landscape design and character
- ongoing maintenance and management regimes and costs needing to be clearly defined and committed to
- impacts on and access to the SAM
- positive ground floor uses and activation being provided

6.19 It will be challenging to ensure all the uses (parking, play facilities etc.) can be provided in the landscape without compromising the principle of the landscape first scheme. Further confidence is required on how the landscape will be maintained to a sufficiently high standard.

6.20 Given the proximity to the SAM, further clarification is required on the usability of the landscape spaces, the public access to the landscape around the buildings, and the open relationship between the public car park and the landscape. It is understood from the applicant that discussions are ongoing with Historic England in respect to opening the SAM to the public and incorporating linkages with the scheme and the neighbouring Cane Hill development.

6.21 Further work is required to provide sensitive ways in which the site could be made secure for the use of residents, with the exception of the public car park, the route to and up to the top of the SAM and the linear park space fronting Lion Green Road. This could be realised through the use ha-has or berms as landforms and would not necessarily need to rely on unattractive fences.

6.22 Whilst the scheme is moving in the right direction (in terms of scale and mass) the proposals need to be tested properly, utilising a series of views as part of a visual impact assessment.

6.23 The use of grasscrete is supported in principle to create a softer surface for vehicles on the residential parking element. However, further details will be required by the Council's Parking Services Team to determine whether this approach would be acceptable in terms of a Council operated car park.

6.24 Clarity is required regarding which areas will be managed and maintained by the developer, which by a future management company and which by Council services (e.g. highways, parking, property, green spaces). Further clarity is required as it helps inform the design process and will provide an understanding about future management and maintenance arrangements.

6.25 Officers have requested further materials as part of the on-going pre-application process including images to show the Cane Hill development in relation to the proposed scheme; more details on the landscaping and the maintenance of this; more connection with the Cane Hill site sections through the site showing the relationship between the proposal, the SAM, Cane Hill and the existing buildings on Lion Green Road.

6.26 Officers have also requested that the applicant test the proposed scheme in views from surrounding streets and vantage points. It is fundamentally important that the local planning authority understands how this scheme will be viewed in its context, particularly in this location adjacent to a SAM. To date, officers have not received any details of this critical piece of work, although it is understood from the applicant that works are being undertaken on a viewpoint appraisal report which will form part of any submission.

Impact on Highways and Parking

6.27 Whilst officers have maintained that the scheme should provide a requirement for circa 100 public car parking spaces (which appears to be achievable) TfL have raised concern about the level of public car parking and its overall use. The current and future use of the public car park (quantum and nature of use – including the length of stay) requires further investigation as part of an eventual planning application submission.

6.28 Strategic Transport and the TfL are both generally supportive of the level of residential car parking provided on site – although there will need to be measures put in place to limit availability of car parking permits.

6.29 The applicants have been liaising with the Councils Strategic Transport team and are required to submit a Transport Assessment and Draft Residential Travel Plan. The scoping note has been reviewed by the Strategic Transport and is general acceptable, subject to providing further details on personnel injury accidents for the location and the provision of EVCP in compliance with the London Plan.

Impacts on Trees

6.30 The Lion Green Road site also has a number of mature trees on site and there are some concerns from the Council's Arborists in respect to the proposed scheme. It has indicated that an assessment of the existing trees in the proposed Copse and Bluebell & Beech Wood must be undertaken before agreement can be reached regarding this part of the landscaping. The relationship between the proposed trees and the buildings/parking spaces is a little unsatisfactory in a couple of instances; with Block B and the adjacent trees and the relationship of trees to car parking spaces. This would need to be given more detailed consideration.

6.31 The proposed tree planting along Lion Green Road boundary, whilst undoubtedly attractive, could be a little more substantial. The tree planting in this location must be of sufficient stature to suitably replace the mature trees removed from the front of the site. A detailed tree survey and constraints plan will be required as part of any full application, and loss of trees should be suitably mitigated.

Impact on Adjoining Occupiers

6.32 As the scheme progresses, detailed assessments will be needed to demonstrate that the proposals would not have any adverse impact on existing neighbouring

uses. Specific regard will need to be had to overlooking and visual impacts on the existing residential units along Lion Green Road, Gilbert Court at the rear and impacts on the Scout facilities and also the future residents at Cane Hill.

6.33 Daylight/sunlight assessments should be required as part of any submission.

Archaeological Priority Zone (APZ)

6.34 Given that the scheme would be located within an APZ and is a major scheme, it would be deemed a high risk and likely to cause harm to heritage assets of archaeological interest. As such as a minimal requirement an archaeological desk based assessment, and if necessary a field evaluation, to accompany a planning application would be required. It is understood work was undertaken in this regard on the previous extant permission.

Other Planning Matters

6.35 Further details will be required in respect to a land contamination desk report, flood risk and sustainable drainage measures, noise and air quality.

7. RELEVANT PLANNING POLICIES AND GUIDANCE

7.1 Planning applications should be determined in accordance with the Development Plan unless material consideration dictate otherwise. The Council's adopted Development Plan consists of the Consolidated London Plan 2015, the Croydon Local Plan: Strategic Policies 2013 (CLP1), the Croydon Replacement Unitary Development Plan 2006 Saved Policies 2013 (UDP).

7.2 Government Guidance is contained in the National Planning Policy Framework (NPPF), issued in March 2012. 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 many key issues for the delivery of sustainable development, those most relevant to this case are:

- Promoting sustainable transport;
- Delivering a wide choice of high quality homes;
- Requiring good design.

7.3 The main policy considerations raised by the application that the Committee are required to consider are:

London Plan 2017

- 3.3 Increasing housing supply
- 3.4 Optimising housing potential
- 3.5 Quality and design of housing developments
- 3.7 Large residential developments
- 3.8 Housing choice

- 3.9 Mixed and balanced communities
- 3.10 Definition of affordable housing
- 3.12 Negotiating affordable housing
- 3.13 Affordable Housing thresholds
- 5.2 Minimising carbon dioxide emissions
- 5.3 Sustainable design and construction
- 5.7 Renewable energy
- 5.9 Overheating and cooling
- 5.10 Urban greening
- 5.11 Green roofs and development site environs
- 5.13 Sustainable drainage
- 5.15 Water use and supplies
- 5.21 Contaminated land
- 6.3 Effects of development on transport capacity
- 6.9 Cycling
- 6.10 Walking
- 6.11 Smoothing traffic flow and tackling congestion
- 6.12 Road Network Capacity
- 6.13 Parking
- 7.1 Lifetime neighbourhoods
- 7.2 An inclusive environment
- 7.3 Designing out crime
- 7.4 Local character
- 7.5 Public realm
- 7.6 Architecture
- 7.7 Tall and large buildings
- 7.8 Heritage assets
- 7.14 Improving Air Quality
- 7.15 Reducing and managing noise
- 7.21 Trees and Woodland
- 8.2 Planning obligations
- 8.3 Community infrastructure levy

Croydon Local Plan: Strategic Policies 2013 (CLP1):

- SP1.1 Sustainable Development
- SP2.1 Homes
- SP2.2 Quantities and Locations
- SP2.3 Affordable Homes - Tenure
- SP2.4 Affordable Homes - Quantum
- SP2.5 Mix of homes by size
- SP2.6 Quality and Standard
- SP3.1 Employment
- SP3.2 Innovation, Investment & Enterprise
- SP4.1-4.3 Urban Design and Local Character
- SP4.5-4.6 Tall buildings
- SP4.7-4.10 Public Realm

- SP4.13 Character, Conservation and Heritage
- SP6.1 Environment and Climate Change
- SP6.2 Energy and CO2 Reduction
- SP6.3 Sustainable Design and Construction
- SP7.4 Enhance biodiversity
- SP8.3-8.4 Development and Accessibility
- SP8.6 Sustainable Travel Choice
- SP8.7(h) Cycle Parking
- SP8.13 Motor Vehicle Transportation
- SP8.15-16 Parking

Croydon Replacement Unitary Development Plan 2006 Saved Policies 2013 (UDP):

- UD1 High Quality and Sustainable Design
- UD2 Layout and siting of new development
- UD3 Scale and Design of new buildings
- UD6 Safety and Security and New Development
- UD7 New Development and Access for All
- UD8 Protecting residential amenity
- UD13 Parking Design and Layout
- UD14 Landscaping
- UD15 Refuse and Recycling Storage
- EP1 – EP3 Pollution
- EP5 - EP7 Water – Flooding, Drainage and Conservation
- T2 Traffic Generation from Development
- T4 Cycling
- T8 Parking
- H2 Supply of new housing
- H3 Housing Sites
- H4 Dwelling mix on large sites

There is relevant Supplementary Planning Guidance as follows:

- London Housing SPG, March 2016
- Homes for Londoners: Affordable Housing and Viability SPG, August 2017
- National Technical Housing Standards, 2015
- National Planning Practice Guidance, 2014
- Play and Informal Recreation SPG
- Accessible London: Achieving an Inclusive Environment SPG
- Sustainable Design and Construction SPG
- Croydon Public Realm Design Guide, 2012
- SPG Note 3 – Designing for Community Safety
- SPG Note 10 – Designing for Accessibility
- SPG Note 12 – Landscape Design
- SPG Note 15 – Renewable Energy
- SPG Note 17 – Sustainable Surface Water Drainage
- SPG Note 18 – Sustainable Water Usage

Emerging Policies CLP1.1

- SP2.2- Quantities and locations
- SP2.3-2.6- Affordable Homes
- SP2.8- Quality and standards
- SP4.13- Character, conservation and heritage
- SP6.3- Sustainable design and construction
- SP6.4- Flooding, urban blue corridors and water management
- SP8.9- Sustainable travel choice

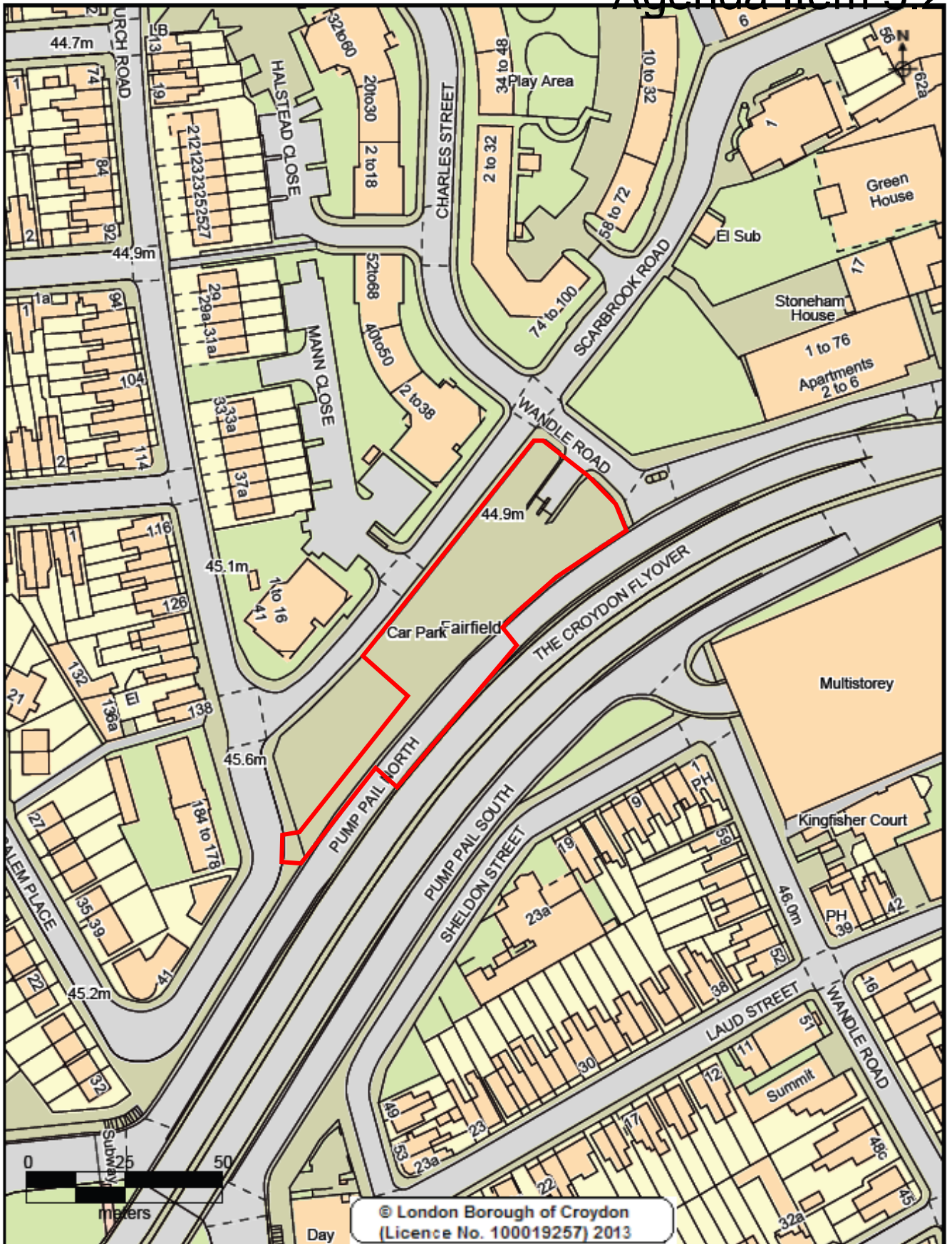
Emerging Policies CLP2

- DM1- Housing choice for sustainable communities
- DM5- Development in Croydon Metropolitan Centre
- DM5.1- Vitality and viability
- DM5.3- Mixed use developments
- DM9- Development in edge of centre and out of centre locations
- DM11- Design and character
- DM11.1- Quality and character
- DM11.2- Quality of public and private spaces
- DM11.4- Residential amenity space
- DM11.5- Communal residential amenity space
- DM11.6- Protecting residential amenity
- DM11.7- Design quality
- DM11.9- Landscaping
- DM11.10- Architectural lighting
- DM14- Refuse and recycling
- DM16- Tall and large buildings
- DM17.1- Promoting healthy communities
- DM19.1- Character, appearance and setting of heritage assets
- DM19.9- Archaeology
- DM24- Development and construction
- DM25- Land contamination
- DM26.2- Flood resilience
- DM26.3- Sustainable drainage systems
- DM28- Biodiversity
- DM29- Trees
- DM30- Promoting sustainable travel and reducing congestion
- DM31- Car and cycle parking in new development
- DM39- Site allocations (Site 372: Car Park, Lion Green Road)

7.4 The Partial Review of Croydon Local Plan: Strategic Policies (CLP1.1) and the Croydon Local Plan: Detailed Policies and Proposals (CLP2) was approved by Full Council on 5th December 2016 and was submitted to the Planning Inspectorate on behalf of the Secretary of State on 3rd February 2017. The examination in public took place between 16th May and 31st May 2017. Main

modifications have been received from the Planning Inspector and the Council are consulting on these modification during the period 29th August – 10th October 2017.

- 7.5 According to paragraph 216 of the NPPF, relevant policies in emerging plans may be accorded weight following publication, but with the weight to be given to them is dependent on, among other matters, their stage of preparation. Now that the main modifications to CLP1.1 and CLP2 have been published for consultation, there are certain policies contained within these plans that are not subject to any modifications and significant weight may be afforded to them on the basis that they will be unchanged when CLP1.1 and CLP2 are adopted.



PART 5: Development Presentations

Item 5.2

1. DETAILS OF THE DEVELOPMENT

Ref: 17/05566/PRE
 Location: Part of Car Park, Wandle Road, Croydon CR0 1DX
 Ward: Fairfield
 Description: Presentation of a pre-application scheme for the erection a residential building of part 5, 23 and 25 storeys to accommodate approximately 130 flats and 950m2 of flexible office, retail and restaurant space; landscaping and public realm works; access and other associated works.
 Drawing Nos: N/A
 Applicant: Alison Brennan – Brick by Brick
 Agent: Peter Twemlow – DP9
 Case Officer: Richard Freeman

	1 bed	2 bed	3 bed	TOTAL
TOTAL FLATS	56	58	14	128
AFFORDABLE (INTERMEDIATE) FLATS	27	27	14	68
PRIVATE FLATS	29	31	0	60

Number of car parking spaces	Number of cycle parking spaces
12 blue badge spaces	202

2. PROCEDURAL NOTE

- 2.1 This report is in an experimental format to provide a more focussed approach to pre application presentation to and engagement with Planning Committee. The report covers the following points:
- a. Executive summary of key issues with scheme
 - b. Site briefing
 - c. Summary of matters for consideration
 - d. Officers’ preliminary conclusions
- 2.2 Officers would be grateful for feedback from the Planning Committee on the success of the format.

3. EXECUTIVE SUMMARY OF KEY ISSUES WITH SCHEME

- 3.1 The proposed scheme is a mixed use, residential led development comprising a part 5, 23 and 25 storey tower currently accommodating 128 flats and 950m2 of flexible office and retail/restaurant space (Use Classes B1, A1 and A3).

- 3.2 The scheme has developed through a series of pre-application meetings and was reviewed by the Place Review Panel in November 2016 (at a very early stage) and October 2017. The conclusions of the Place Review Panel are included at the end of this report. The case has also been viewed by GLA officers at pre application (meeting held on the 14th November 2017). The applicant intends to submit the proposal shortly after the presentation to Planning Committee and is keen to consider further comments prior to submission.
- 3.3 Officers consider that the scheme is developing in a positive fashion. There are a number of key issues which officers are keen to draw to Members attention and to generate debate:

Provision of Affordable Housing

The scheme currently shows provision of 53% of units as being affordable, with all proposed as shared ownership/intermediate accommodation, which equates to 56% affordable housing by habitable room. Whilst this overall amount of affordable housing provision is very positive and numerically, is higher than policy requires, policy also requires affordable housing to be delivered as mixed tenures (affordable rent and intermediate) at a ratio of 60:40 in favour of affordable rent. This split is required to ensure that housing development accommodates a range of affordable housing needs.

Whilst this scheme manages to provide 53% of units as affordable housing by proposing all as intermediate tenures, policy seeks to secure as much affordable housing as possible (up to 50%) whilst also meeting local housing requirements through the provision of affordable rent. There is concern that the development, at present, fails to deliver on a range of affordable housing needs. Officers are working with the applicant to consider alternatives including the additional of some affordable rent products or intermediate rental products with higher levels of discount market rent. This is discussed further at paragraph 5.3.

Massing and Heritage Impact.

The scheme is in close proximity to a number of heritage assets, most importantly Grade I and II* Listed Buildings (the Croydon Minster, the Old Palace and the Pumping Station respectively) as well as Conservation Areas, a Scheduled Ancient Monument and numerous Grade II Listed Buildings. At the time of report writing, whilst a taller building might well be considered acceptable, insufficient information has been submitted for officers to form a view on the proposal from this perspective.

Ground floor and relation with the street.

The ground floor as currently shown has very large areas of servicing space and limited visual connections with the street from “active” areas of the building’s frontage. This is compounded by needing to raise the floor level in order to overcome flood risk, which will necessarily result in level changes, stairs and ramps between the pavement and the building. Additionally, officers are concerned about the success of the flexible B1/A1/A3 unit on the ground floor,

given its relationship with the flyover. Officers recommend that this is re-considered and integrated into the residential lobby design as a multi-functional area.

Residential Amenity

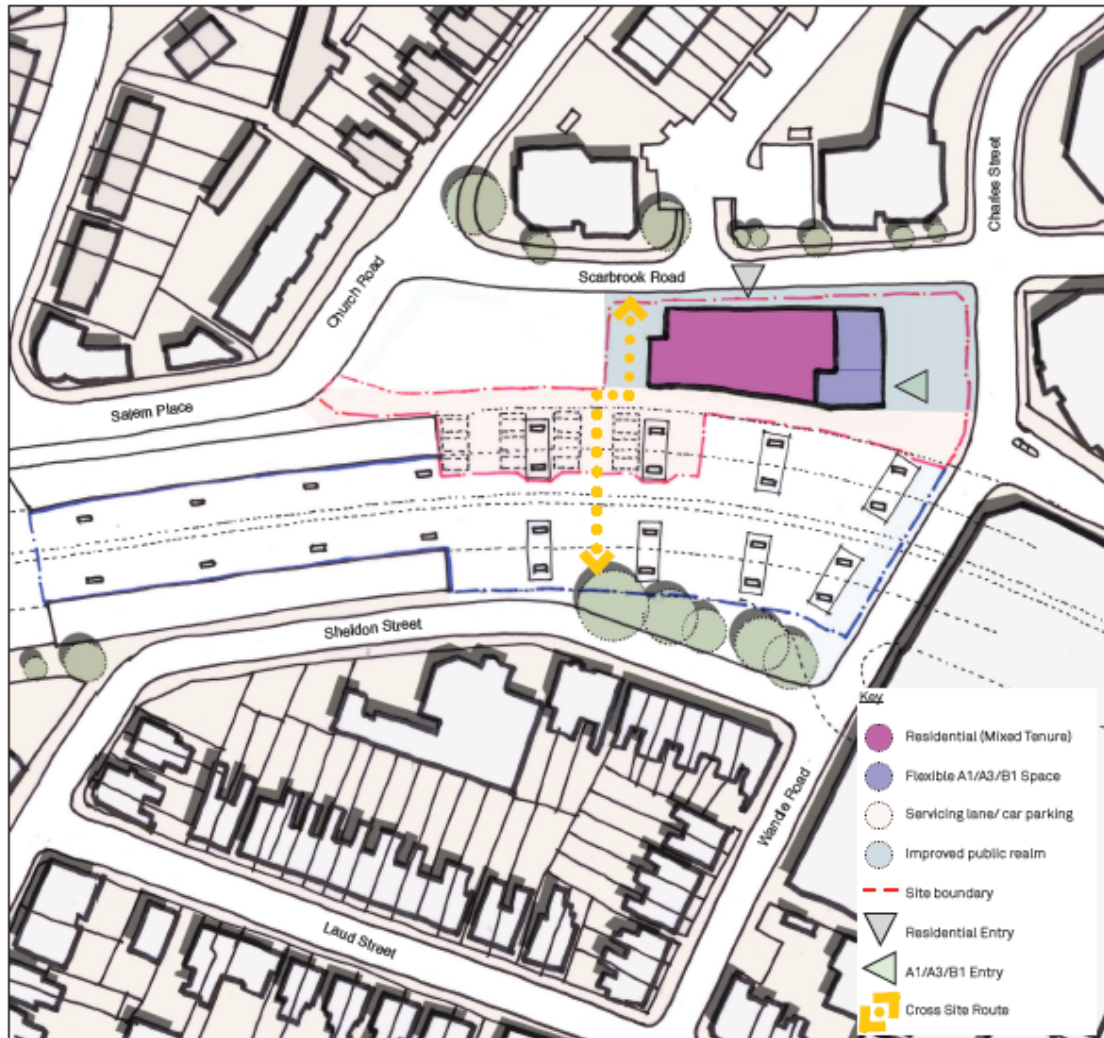
Due to the location of the site, the building will require mechanical ventilation to overcome air quality and overheating issues. Amenity spaces are provided as enclosed winter gardens as opposed to balconies and no communal amenity space is currently proposed. Full details of the ventilation approach have yet to be provided to officers but the scheme will require mechanical ventilation with NO_x filters which are likely to be expensive to maintain. Whilst communal amenity space should be required, internal communal space could well prove to be acceptable, in view of site constraints.

Impact on adjoining occupiers

The scheme has some impact on the light and outlook to properties on the opposite side of Scarbrook Road. This has been compared to a mid-rise slab block scheme and the impacts found to be broadly comparable. Officers are satisfied with this approach given the high existing access to light and outlook and the Metropolitan Centre location of the scheme. Wind testing needs to be undertaken and more detailed daylight and sunlight impacts considered.

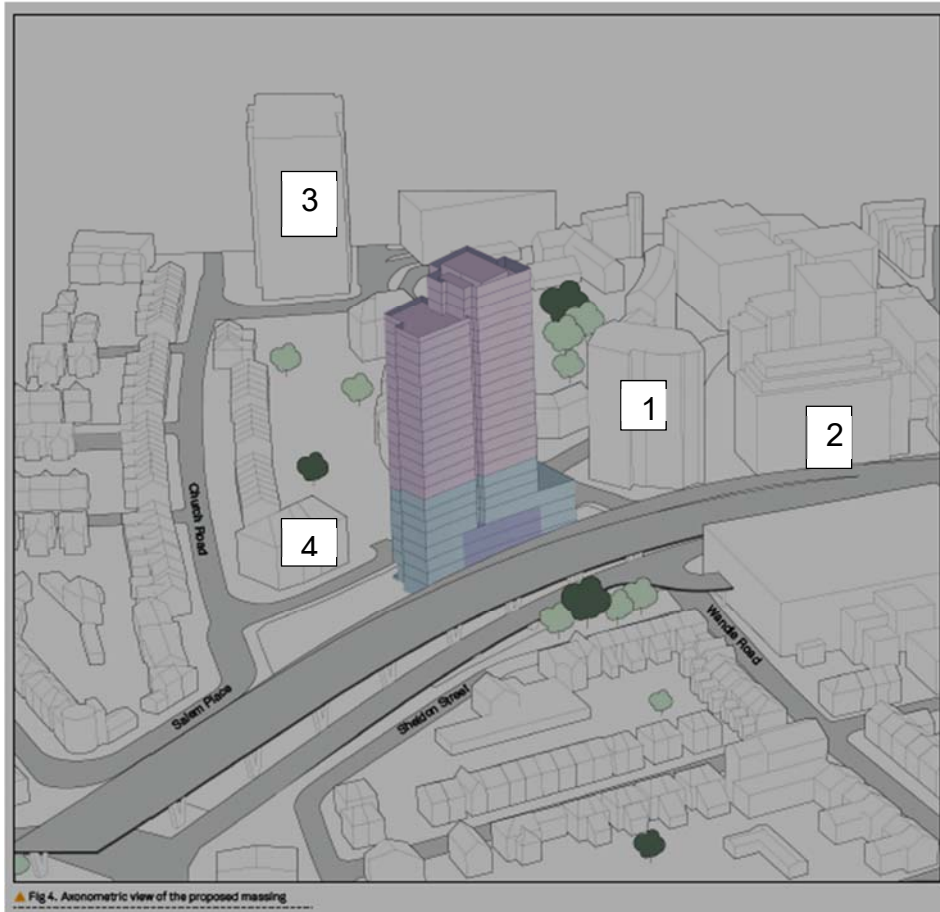
4. SITE BRIEFING

- 4.1 The site is located adjacent to and under the Croydon flyover and is currently used as a Council and pay and display car park. The new local plan (Croydon Local Plan: Strategic Policies 2017 Partial Review (CLP1.1) and the Croydon Local Plan: Detailed Policies and Proposals 2017 (CLP2)) allocate the site for bus standing, an energy centre and residential uses. It is in the Croydon Metropolitan Centre, the Opportunity Area, an area of high density and an Archaeological Priority Area and is at risk of flooding (see plans below).
- 4.2 The area outlined in red hatching on the plan (below) is the application site for the current scheme with the proposed main residential entrance fronting onto Scarbrook Road, the secondary office entrance on Wandle Road with a small landscaped area to the frontage. A service road would run along the rear (parallel to the flyover) with disabled parking spaces being provided off this access. Access would be off Wandle Road with egress onto Church Road.
- 4.3 The area outlined in blue (under the flyover) is the part of the site proposed for bus standing, to remove buses from Central Croydon. A number of layouts for this part of the site have been investigated at high level but this area does not form part of the pre application proposals.



▲ Fig 10. Ground floor entrance and public realm

- 4.4 The area not outlined (the area at the junction of Scarbrook Road and Church Road) is the proposed location for an energy centre to supply a future district
- 4.5 There are a number of tall buildings already in the area as the drawing below demonstrates.
- 4.6 The building on the corner of Whitgift Street and Wandle Road (1) is 13 storeys in height, the building on Whitgift Street (2) is ten storeys in height and Ryland House (3) (identified as having a negative impact on the Church Street, Central Croydon and Croydon Minster Conservation Areas and Listed Buildings within them) is 14 storeys in height. Some flats on Scarbrook Road are four storeys in height (4).



5. SUMMARY OF MATTERS FOR CONSIDERATION

5.1 The main matters for consider in a future submission are:

5.2 Principle of Development

- The wider site is allocated in both existing and emerging plans for provision of bus standing (to remove bus standing from Central Croydon), an energy centre (to supply a future district heat and power network for the town centre) and for residential purposes. As the residential use is coming forward first, the scheme will need to demonstrate that the other site allocations can be accommodated on site in future scenarios.

5.3 Affordable Housing Provision

- The scheme is currently proposing that whilst a proportion of units will be offered for outright sale, 53% of units are offered as affordable housing, albeit as intermediate housing as shared ownership. This is a high overall headline figure of affordable housing and should be welcomed in principle although one also needs to have an eye on overall levels of affordability and the desire to accommodate a wide range of affordable housing needs;
- Policy requires a 60:40 split of affordable housing tenures between affordable rent and shared ownership, with up to a 50% provision of units, depending on

viability. Viability testing is in early stages but it appears likely that the scheme is able to provide the level and form of affordable housing currently proposed. However this form and level of provision would not be in full accordance with policy requirements as it would not accommodate the 60:40 mix expected by policy.

- Whilst it is difficult to accommodate shared ownership, affordable rent and private rent tenures within a single core arrangement, it is possible. Also, in this instance, the scheme has a second lift and stair core (serving an office) which could potentially be re-purposed to provide access to affordable rent units. Providing different tenures and especially affordable rent, will have a significant impact on the overall amount of affordable housing schemes can provide and early testing suggests that the overall amount of affordable accommodation could well reduce to around 25% - should a policy compliant tenure split of 60:40 (affordable rent/shared ownership) be provided. There are clearly options to be further explored between a full shared ownership offer and a fully policy compliant offer.
- Further testing on viability and affordable housing provision is required to identify an appropriate balance between the quantum and form/affordability of affordable housing. The applicant is testing a number of different affordable housing scenarios including whether all three tenures of accommodation (private, intermediate affordable and affordable rent) can be provided via a single lift core and whether the intermediate accommodation could include elements of discount market rent (also an intermediate product) at rental levels equivalent to affordable or social rent. Whilst officers consider that this is a route which is worth exploring, other elements of the tenure may also need to be replicated to ensure that this truly meets an equivalent housing need – such as eligibility criteria.

5.4 Housing Mix

- The Croydon Opportunity Area Planning Framework (OAPF) policy suggests that this area should provide 45% of units as 3 bed units, as the area is considered to be a “fringe” area where mid-rise developments are more likely, which can more readily include family accommodation.
- The proposal only includes 11% 3 bed units, but all 2 bed units (which comprise 45% of the scheme) are 2 bed, 4 person units which provide some family accommodation.
- Officers consider this is acceptable given the type of building proposed, the position in emerging policies that 2 bed, 4 person units can provide family accommodation if necessary for the first three years of the plan and that the site is probably of limited attraction to families being located adjacent to a flyover.
- 10% of units are provided as wheelchair user dwellings, which is in line with policy requirements.

5.5 Massing - Townscape

- The OAPF sets different height character areas with different approaches to massing. This area is defined as an “outer” area where *“In general, tall buildings are unlikely to be acceptable in the outer area. Site specific*

circumstances and site history will have an important role to play in determining exact heights of future buildings in this area." The site is in close proximity to some existing tall buildings on Scarbrook Road (13 storey), 4 storey and traditional 2 storey terraced houses at the western side of the site.

- Officers are satisfied that a tall building can be accommodated on the site as long as the impacts on these properties and others, are satisfactory and that the overall impact on townscape and other receptors is acceptable. The proposed height, at 25 storeys, is significantly taller than other buildings in the area.
- Long distance views of the scheme do show that in views from the south, including some which are designated views or panoramas in policy documents, the building would appear separate to the main high rise townscape of Croydon and would be significantly visible. This is likely to give rise to some visual prominence which could well be acceptable, if the design and appearance is of an exemplary appearance. Further information is required (including views analysis) before this can be fully considered and determined.

5.6 Massing – Heritage

- To the south of the site is the Laud Road Local Heritage Area and to the north is the Old Town Masterplan area, which is a heritage led masterplan, containing parts of the Church Street, Croydon Minster and Central Croydon Conservation Areas. The Croydon Minster and the Old Palace are Grade I Listed. The Tudor Arch, located in the graveyard (itself a Locally Listed Historic Park and Garden) of the Minster is a Scheduled Ancient Monument and there are numerous Grade II Listed Buildings in the area including the Pumping Station, the Town Hall and various properties on Church Street.
- At the time of writing the report, insufficient testing has been carried out to be able to assess the impact on these very important heritage assets robustly. Consequently, officers are unable to draw conclusions as to the heritage impact of the scheme but consider it likely that the proposal would impact on heritage assets. Where less than substantial harm is caused, this can be balanced against public benefits of the proposal. In this instance, the provision of accommodation, provision of affordable housing and provision of a public route across the site are the public benefits the scheme would bring. It is crucial therefore that these public benefits are realised and maximised. The provision of a route would be of benefit in providing a safer and more direct route through the area and the scheme would provide a significant quantum of housing.
- Without the impact on heritage assets having been properly established through testing, the acceptability or not of harm caused and mitigation measures proposed cannot be established.

5.7 Design and Appearance

- The layout of the building on the site is supported, given that it would minimise the impact on surrounding properties and provide an opportunity for enhanced public realm at the junction with Wandle Road. Locating a residential entrance along Scarbrook Road would bring activity along the road which currently has

no frontage. Servicing being taken from the flyover side of the site is sensible but will require careful design of the service area.

- The proposed building is relatively broad, being approximately 35m by 20m. In order to minimise a large, slabby, appearance, the elevation has been broken down into four sections with recesses and a split level at the top. This is supported as an approach to emphasise the slenderness of the building and provide interest.
- The emerging design and appearance of the scheme aims to make use of the concrete frame of the building to establish an architectural rhythm, which is then broken down by a secondary frame to produce a tighter grid which gives benefits of reducing solar heating to the southern elevation and makes the spaces between vertical elements of a residential scale and suitable apertures for fenestration. This establishes a rhythm of piers and decks, with recessed glazed areas adding depth. In a brick of a suitable colour and texture, this is considered likely to give rise to a high quality of appearance.

Officers consider specific elements of design need to be further developed, as follows:

- The landscaped area onto Wandle Road (adjacent to the commercial entrance) needs to be further developed to balance defensive planting against openness and relate more closely to the building. The design of the public route across the site also needs to be developed further along with the proposed service area.
- The ground floor has low levels of activity to Scarbrook Road and a convoluted approach to the residential entrance, exacerbated by level changes necessary to overcome flood risk issues. Plant and storage areas should be as efficient as possible and the flexible use area connected to the residential lobby to increase activity.
- The flexible use area is currently ill-defined. If it is to operate as a standalone café unit, officers consider it is unlikely to be successful given the difficult location adjacent to the flyover and tall buildings.
- The top of the building should be more carefully defined and requires further development.
- The façade rhythm breaks down where the lower elements of the building and the main tower merge, with a number of different treatments thereby requiring further refinement. There are significant areas of “dead” frontage given over to plant and storage in visible areas of the building.
- The scheme needs to be able to accommodate a flue – associated with the future energy centre, which should be carefully designed.

5.8 Residential Amenity

The impact on residential amenity of neighbouring properties needs to be carefully considered given the proximity of the building to other homes. The key areas are:

- **Outlook and Privacy:** The nearest properties are the 4-storey flats to the north of the scheme on Scarbrook Road. The building has been located between these buildings to minimise the impact. These units generally have outlook in

two directions and corner windows, which allows the impact in outlook terms to be acceptable, given the context of a built up Metropolitan Centre. Privacy is maintained by a separation across Scarbrook Road, which is a normal relationship between properties. The terraced homes on Salem Place and Church Road would not be affected.

- Daylight and Sunlight: The same Scarbrook Road properties would be those most affected and the location of the tower again minimises the impact. Given the siting to the south any development would have an impact on levels of light enjoyed by these properties, which is currently very high given the undeveloped nature of the site. A comparison between the impact of a typical 4-storey plinth block and the proposal has been undertaken which shows that whilst some impacts would be worse, others would be better. This is considered likely to be acceptable, subject to detailed testing and a flexible interpretation of BRE Guidance – as suggested in urban, high density character areas
- Wind: No wind testing has yet been carried out and the proposal could potentially impact on both residences and the public realm. The scheme must ensure that spaces meet the comfort standards advised by the BRE. There are often opportunities to minimise this impact in the detailed scheme design.
- Noise: There is potential for the scheme to shield some properties from the noise of the flyover, which would be beneficial. It is unlikely that the proposal would reflect noise directly towards other properties in a significant manner. Plant can normally be adequately screened.

The quality of accommodation for future residents needs to be carefully considered. The key areas are:

- Internal Unit Sizes: all units meet the Nationally Described Space Standards and sizes set out in the London Plan.
- Private Amenity Space: due to the environment of the site, in close proximity to the Croydon Flyover, the scheme proposes to provide winter gardens for units as opposed to balconies due to noise and air quality concerns. These would all meet or exceed the space standards set out in the London Plan and other policies. Given the site constraints, officers consider this is the best approach to take, as long as the winter gardens offer a genuinely semi-external area. High quality precedents have been provided to demonstrate the proposed approach.
- Communal Amenity Space: Local and London Plan policy requires schemes to deliver high quality communal amenity space for residents which should include spaces designed for children to play. No such spaces have been identified to date which again might be challenging to provide externally, in view of the relationship to the flyover and areas of poor air quality.
- Outlook, Light and Internal Layout: Units would generally have dual aspect, being located around the corners. There are two single aspect units on a typical floor, facing towards the flyover (south east) and so would have adequate light. Lower levels do have more single aspect units but the overall number is considered appropriate. The number of units served off a core is generally six, which is considered acceptable.
- Overheating: With a significant number of south and south-east facing units, units would need to be designed not to overheat. The depth of the façade has

been designed to reduce this issue through natural shading and provide solar control. The applicant considers that they can adequately manage this issue through the use of specialist glazing and mechanical ventilation.

- Noise: Given the site location, noise will be a key issue. Residential units should internally achieve noise levels in accordance with World Health Organisation guidelines. The applicant has indicated that this can be achieved through fixed shut windows which is acceptable, assuming that satisfactory mechanical ventilation measures are utilised.
- Air Quality: Similarly, due to the local environment, windows should be closed to respond effectively to air quality issues. This would also necessitate the use of mechanical ventilation and filters to remove NO_x particles. The applicant has indicated that these would be fitted to all units. This is an issue which is still under discussion, given the practical difficulties in ensuring that these measures are suitably effective at managing the air quality and associated health impacts.

5.9 Highways and Parking

- The site is an existing car park which is used during the day, (Monday to Friday as a private carpark - for Council staff - and is available on a pay and display basis outside of this time). The site is also the location of a fleet of car club hire cars.
- The applicant has undertaken a parking accumulation study to demonstrate that the loss of car parking spaces would not have a significant impact on the viability of the Metropolitan Centre and the surrounding highway network. The OAPF sets out a managed reduction in the amount of car parking in the Opportunity Area. Given that only part of the car park is proposed to be developed, Zipcars and other related car club vehicles will be able to temporarily park on other parts of the site.
- Detailed design of the accesses and egresses has not been undertaken to date, but it is considered likely that these can be suitably designed.
- Given the location of the site, nil provision of residents parking is considered appropriate, apart from disabled parking, which is proposed to be provided at 1:1 ratios with units. This is considered acceptable, subject to restricting access to residents' car parking permits, provision of sustainable travel measures such as a residential travel plan, car club spaces and membership and a delivery and servicing plan.

5.10 Sustainability

- Policy requires that major developments are designed in accordance with the London Sustainable Design and Construction SPG and achieve, for residential elements, a zero carbon development and that non-residential elements achieve a 35% reduction in carbon and meet BREEAM Excellent.
- The applicant has indicated that these can be met through on-site measures and that carbon-offsetting may be required for the residential elements.
- The site is partially at risk of flooding, so the scheme proposes a raised floor level to mean that the building would not flood internally. This is considered likely to overcome this risk and safe access and egress can be taken from the part of the site not at risk.

- The site is also at risk of groundwater flooding and no details of measures to overcome this or provide SuDS to reduce run-off rates to below green-field (previously undeveloped) rates, as required by policy, have been submitted.

6. PRELIMINARY CONCLUSIONS

- 6.1 The site is allocated for residential uses, amongst others, so the principal of the development is supported, but it must be demonstrated that the other uses can be accommodated properly on site.
- 6.2 Discussion on viability is still ongoing but officers are keen to further explore options to include a range of affordable housing tenures whilst seeking to secure as much affordable housing (in terms of overall percentage). Providing affordable rent or intermediate rental units at higher discount levels might well reduce the overall amount of affordable housing but would more closely accord with policy and help meet a wider range of affordable housing needs. This is an area the applicant is currently investigating and Members will be updated as part of the presentations.
- 6.3 Insufficient information has been submitted, at the time of report writing, to quantify the impact of the massing in heritage and townscape terms. This is crucial given the expected impact on listed buildings and their setting. Again, this is currently being discussed with the applicant and more detail should be available as part of the presentation.
- 6.4 Whilst the scheme would have an impact on surrounding occupiers in terms of daylight and sunlight, this is likely to be acceptable given the context. The wind impacts need to be quantified.
- 6.5 The residential amenity for future occupiers would be affected by noise and air pollutants from the flyover. This is likely to be successfully tackled by mechanical ventilation but officers need to ensure this approach is sufficiently robust.
- 6.6 The design and appearance of the scheme requires further refinement to both elevations and ground floor layout.
- 6.7 Whilst discussions with the applicant have been positive with proper consideration of the issues raised, it is difficult to draw firm conclusions on some issues, in view of the information currently available, with the most significant issues being affordable housing, massing/heritage impacts and quality of internal accommodation.

7 SUMMARY OF COMMENTS FROM PLACE REVIEW PANEL

- 7.1 The following comments were made when the Place Review Panel reviewed the scheme on the 27th October 2017:

The panel thanked the applicant team for presenting the proposed scheme. Although aspects of the scheme are supported by the panel it requires significant further development and testing before it can be fully supported. The panel has the following key observations and recommendations:

- *The site is very challenging in terms of the necessary noise and air pollution mitigation requirements due to the proximity of the A232 and The Flyover.*
- *Further information is required to assess the scheme's impact on heritage assets in and around the Old Town areas including The Croydon Minster (Grade I Listed), The Old Palace (Grade I Listed), the Pumping Station (Grade II Listed), Conservation areas in Old Town including The Minster Conservation Area and Laud Street Local Heritage Area. Based on the information supplied to the panel, at its currently proposed height, it is possible that the scheme would have a detrimental impact on views from and of these heritage assets and their settings*
- *The panel is very concerned about the proposed use for and design of the ground floors. It questions the viability of the proposed office space and strongly opposes the amount of unarticulated wallspace which would deaden the neighbouring public realm*
- *The building will necessarily be very expensive to construct due to the deep reveals proposed to assist with mitigating solar gain, noise insulation and the air filtering system requirements for air pollution – all of which are supported by the panel*
- *Whilst the articulation of the facades to break up the massing is supported this won't read from a distance if the sun is behind the building therefore the profile and silhouette of the building needs also to be carefully designed*
- *The panel has significant concern about the internal noise, maintenance, use in practice by residents and associated expense of the air filtering system that will be required to mitigate the air pollution from the neighbouring A232 and Croydon Flyover*
- *More information on how the flue for the proposed neighbouring energy centre will be incorporated in to the architecture is required as this could be significantly taller than the proposed building and will be a prominent architectural feature*
- *The quantity of both internal and external communal amenity space for the hundreds of residents that the building will accommodate is too low. Some external community space could be located on the rooftops of the buildings. Potentially a gym, a basketball court and/or a rooftop restaurant could be accommodated in the building*
- *Wind testing is essential and is likely to inform the form of the building*
- *The panel recommends that all flats include windows that can be opened for internal amenity*
- *The few entrances that there are to the building should be generous in size and welcoming which will help activate the frontages*
- *The balustrades could be lowered from 1100mm to 800mm to improve views from within the flats from sitting positions*
- *The deep reveals will create comfortable locations for pigeons which should be mitigated against*
- *The applicant should be mindful of the rapidly changing fire safety regulatory environment for towers and that RIBA recently recommended that towers should have two cores*
- *The top of the building requires design development to strengthen its character and profile given it will be highly prominent*

- *The winter gardens must be generous and attractive spaces and include sufficient space for furniture*
- *Control to the service lane should be considered, given this is likely to be a space that could attract anti-social behaviour due to the blank frontage it faces.*
- *The individual flats will be expensive to maintain due to the air filtering requirements and therefore it is considered appropriate to locate affordable-rent accommodation on a different Brick by Brick site.*

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, Resident Association or Conservation Area Advisory Panel 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 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 July 2011 (with 2013 Alterations)
 - the Croydon Local Plan: Strategic Policies April 2013
 - the Saved Policies of the Croydon Replacement Unitary Development Plan April 2013
 - the South London Waste Plan March 2012
- 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.

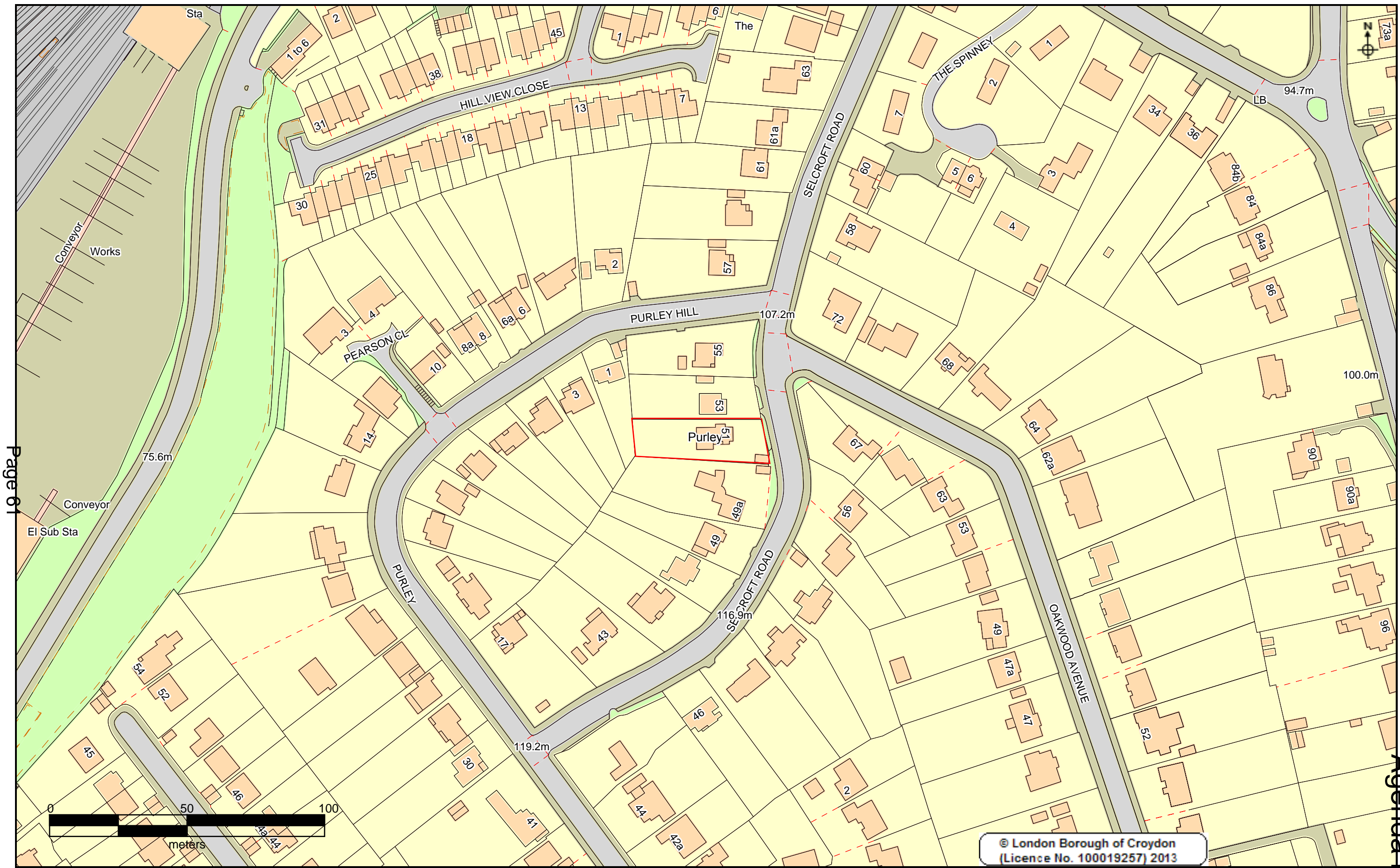
8. BACKGROUND DOCUMENTS

- 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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London Borough Croydon



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PART 6: Planning Applications for Decision

Item 6.1

1 SUMMARY OF APPLICATION DETAILS AX10+15-53-101

Ref: [17/04306/FUL](#) (Link to associated documents on Planning Register)
 Location: 51 Selcroft Road, Purley, CR8 1AJ
 Ward: Purley
 Description: Demolition of existing building and erection of a two-storey building including accommodation within the main roof slope and creation of basement level to form 7 flats (2 x 1 bedroom, 4 x 2 bedroom and 1 x 3 bedroom) provision of 7 parking spaces, refuse storage and cycle stores.
 Drawing Nos: 12-P-03/H, 12-P-04/D, 12-P-05/D, 12-P-06/E, 12-P-07F, 12-P-8/E, 12-P-10/B, 12-P-11, 12-P-12
 Applicant: Matthew Corcoran
 Agent: Stirling Rose
 Case Officer: Christopher Grace

	1 bed	2 bed	3 bed	4 bed
Houses	0	0	0	0
Flats	2	4	1	0
Totals	2	4	1	0

Type of floorspace	Amount proposed	Amount retained	Amount lost
Residential	568Sq.m	0 Sq m	134Sq m
Number of car parking spaces		Number of cycle parking spaces	
6		9	

1.1 This application is being reported to Planning Committee because it has been referred because Councillor Simon Brew and the Purley and Woodcote Residents Association have made representations in accordance with the Committee Consideration Criteria and requested Planning Committee consideration and objections above the threshold in the Committee Consideration Criteria have been received

2 RECOMMENDATION

- 2.1 That the Planning Committee be resolved to GRANT planning permission
- 2.2 That the Director of Planning and Strategic Transport has delegated authority to issue the planning permission and impose conditions [and informatives] to secure the following matters:

Conditions

- 1) Built in accordance with approved plans
- 2) Materials to be submitted for approval

- 3) No additional windows to be inserted in either of the flank elevations other than as specified
- 4) Details to be provided:-
 - a) Finished floor levels (including forecourt levels)
 - b) Hard and soft landscaping – including species / size and permeable surfaces
 - c) Boundary treatment – including, side access gates, private amenity space, lightwell enclosures
 - d) Vehicle site lines along Selcroft Road
- 5) Refuse storage requirements
- 6) Cycle storage requirement
- 7) Electric vehicle charging points
- 8) Details of roof lights
- 9) Demolition and construction method statement
- 10) 19% reduction in carbon emissions
- 11) 110 litre water consumption target
- 12) Tree protection measures
- 13) Sustainable drainage/run off rates/surface water measures (incorporating SUDs and permeable paving within forecourt),
- 14) Parking to be provided before the buildings are occupied
- 15) Commence within 3 Years

Any other planning condition(s) considered necessary by the Director of Planning and Strategic Transport, and

Informative

- 1) CIL - granted
- 3) Code of Practice regarding small construction sites
- 3) Highways works to be made at developer's expense

Any [other] informative(s) considered necessary by the Director of Planning

- 2.3 That the Planning 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.

3 PROPOSAL AND LOCATION DETAILS

Proposal

- 3.1 The proposal would involve the demolition of the existing detached bungalow (with existing rooms in the roof space) and construction of a part two, part single storey building which would also incorporate a basement plus a further floor of accommodation within the main hipped roof slope, to provide a total of 7 flats. The proposed 7 flats would comprise of 2x1 bedroom flats (51-52 sq.m floorspace) 4x2 bedroom flats (between 61-74 sq.m floorspace) and 1x3 bedroom flat (107 sq.m of internal floorspace) .
- 3.2 The proposal would occupy the footprint of the current building and would have the following dimensions:
 - A maximum of height 9.3m (5.3m high at eaves), 13m wide and maximum depth of 19m.

- 3.3 The proposed building would be constructed of the following materials:- soft facing stock brickwork at the base of the building; render finish to upper half; roof tiles; stone band course, cills and lintels; white fascia and soffits; stone plinth capping; timber frame windows and doors; glass balustrade.
- 3.4 The proposal would include parking for 6 cars (including an electrical charging point) using existing single vehicle access off Selcroft Road, storage provision for 9 cycles and refuse store within the front garden.
- 3.5 The proposal would include extensive landscaping with 8 new trees added to the site; new grass beds at front of building, private garden areas to the 3 flats located at ground floor level and communal garden areas (approximately 220 sq.m). In addition there would be hard landscaping and concrete paving to vehicle and pedestrian routes, new boundary treatment with a variety of tree/shrub planting in and surrounding the site boundary.

Amendments:

- The proposed drawings have been amended to reorganise the internal layout at ground floor level; replace previous dormers to the rear with rooflights; introduce a side chimney; introduce pitch roof design to rear bay and single storey extension; screening to front and rear lightwells; parking to be concealed behind front boundary hedging; planting along neighbouring boundaries; planting enclosure to refuse areas; reduce height from 9.8m to 9.3m at ridge level (by lowering the base further into the site).
 - The proposed drawings now includes a through section of the building to demonstrate that the rooms within the roof space would have reasonable light and outlook from the bedroom velux windows.
- 3.6 Local residents were advised of these further amendments and any further comments received will be reported orally at Planning Committee.

Site and Surroundings

- 3.6 The application relates to a detached bungalow with additional accommodation in the roof and single storey conservatory extension located on the east side of Selcroft Road. The surrounding properties consist of single and two storey detached and semi-detached properties with hipped roof forms set back 12m from the road. The existing building has the following dimensions:-
- 5.7m high (2.7 to 2.8m at eaves), 12.7m wide, 17m deep with separate garage.
- 3.7 The surrounding area is residential in character with similar hipped roof forms and construction. To the south of the application site adjoins a single storey detached bungalow (49a Selcroft Road). To the north is a part single /two storey detached house (53 Selcroft Road). To the east are rear gardens to two-storey detached houses in Purley Hill (1-7 Purley Hill). Opposite to the west are two storey detached properties along Selcroft Road
- 3.8 The site is located within an area of Surface Water Flood Risk (1:1000yr). There are no protected trees identified within the site and no other designations for the site identified on the Croydon Local Plan Policies map.

Planning History

3.7 The following planning decisions are relevant to the application:-

03/00273/P: Planning permission granted for erection of detached garage and alterations to vehicle access.

97/00824/P. Planning permission granted for erection of conservatory.

4 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- 4.1 The principle of replacing the existing building with the form of a large detached house, replicating similar features to that of surrounding properties is considered to be acceptable.
- 4.2 The proposed new building would preserve the character of the area and would not have a harmful affect upon the appearance of the street scene along Selcroft Road.
- 4.3 The proposed new building would not have a detrimental effect on the residential amenities of the adjoining occupiers and would provide an acceptable living environment for the future occupiers.
- 4.4 The development would provide an appropriate level of parking for the proposed development, encourage sustainable modes of transport other than the car, incorporate safe and secure vehicle access to and from the site and would have an acceptable impact on the highways network.
- 4.5 The development would incorporate sustainability requirements and incorporate sustainability technics as part of the overall drainage strategy.

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:

6 LOCAL REPRESENTATION

6.1 The application has been publicised by way of neighbour letters. 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: 47 Objecting: 46 Supporting: 1

No of petitions received: 0

6.2 Representations have been made from the following local groups/societies objecting the proposal::

Purley and Woodcote Residents Association.

- Do not object to the principle of replacing a bungalow by a two storey detached house similar to those on either side. Do however object to the proposal to build it

as flats. That would be totally out of character for this particular road and replacing what is an outstanding attractive front garden by a car park for such a large number of flats would be very damaging to the street scene.

6.3 The following issues were raised in representations. Those that are material to the determination of the application, are addressed in substance in the MATERIAL PLANNING CONSIDERATIONS section of this report:

Summary of objections	Response
<i>Principle of development</i>	
With exception of 41 Selcroft Road, with four flats, Selcroft Road is characterised as single mixed dwelling from bungalows to large single family properties; destruction of perfectly good housing stock; under NPPF inappropriate development; loss of garden being excavated and rest used as car park.	The introduction of alternative residential accommodation on this site is considered acceptable in principle subject to design, density, amenity and transportation considerations. Refer to paragraphs 8.2-8.5 of this report.
<i>Scale and massing</i>	
Overdevelopment; a 13 bedroom block of 7 flats over 4 floors will present an oppressive and overbearing structure on the road; disproportionately large in relation to other properties in area; building would not be lower than no.49a Selcroft Road; compromise the appearance and integrity of the area; substantial excavation; access and overall effects; fail to account for gradient; massing detail extends deep into rear garden beyond rear building line; steal rear garden; inclusion of chimney add to scale bulk and mass; set precedent for further intrusive overdevelopment; not in line with Boroughs character appraisal; ruin character of the road;	Officers consider that the proposal in terms of scale and massing creates an acceptable transition in scale between the application site and the surrounding buildings. Refer to paragraph 8.6-8.18 of this report.
<i>Appearance</i>	
Obtrusive, roof dwellings, basements and courtyards not in keeping with streetscape and area; would not respect or enhance natural environment; damage visual impact on residential road; result in	Officers consider that the proposal in terms of external appearance would be acceptable. Refer to paragraph 8.13-8.16 of this report

<p>overbearing visual intrusion with removal of front garden; more landscaping to the front is required; long extension considerable push into rear garden; lack of green space ; loss of trees and rear garden; no details of materials; parking materially harming appearance; replacement of dormers in roof with rooflights step in right direction still too many windows;</p>	
<p><i>Density</i></p>	
<p>The proposal would result in an overdevelopment of the site with present house providing occupancy of approx. 2 people the proposal likely to provide 20 people; leading to unacceptable intensification in area with PTAL 0 proposal would lead to strain on current schools; hospitals and doctors; new plans have not taken into consideration points raised</p>	<p>Maximise the potential site with suitable scaled buildings limited physical impact. Refer to paragraph 8.17 of this report.</p>
<p><i>Daylight and sunlight</i></p>	
<p>Overshadowing; excessive light pollution; decrease light; no sunlight and daylight report provided; no detail as to sun impact on neighbouring properties;</p>	<p>Officers consider that due to the position and height of the building the resultant levels of daylight/sunlight are acceptable within an urban setting. Refer to section 8.19-8.23 of this report.</p>
<p><i>Outlook</i></p>	
<p>49 Selcroft Road has no rear windows on its rear elevation; proposal would result in higher concentration of windows; a loss of privacy; unable to maintain views; additional floor leads to substantial overlooking into neighbouring bedrooms and main living room areas, private gardens and properties and significant loss of privacy including 1 to 7 Purley Hill;</p>	<p>Officers consider that the proposal will have some impact on neighbour's outlook but this is considered to be acceptable. There is no right to a protection of view under planning. Refer to paragraph 8.19-8.23 of this report.</p>
<p><i>Noise</i></p>	
<p>Increase in noise and disturbance, through additional windows construction</p>	<p>Officers consider that the introduction of residential use in the residential area would not lead to an unacceptable level of noise and</p>

	disturbance. Refer to paragraph 8.23 of this report.
<i>Standard of accommodation</i>	
Minimal recreational space is provided; cramped accommodation Lack of private open space and inadequate amenity provision for 13 people.	Officers consider the proposal would provide a reasonable level of private and communal amenity provision in line with London Plan standards. Refer to paragraph 8.25- 8.26 of this report.
<i>Waste</i>	
Plans show 7 bins but no recycle boxes; on day of refuse collection bins and recycling will block pavement; no visible screening to bins	The applicant plans includes refuse storage provision. Refer to paragraph 8.33 of this report.
<i>Transport</i>	
PTAL 0 unsuitable for density proposed; Concern over more cars, traffic and congestion in the area and pressure for on street parking; No provision for storage of cycles; concentration provision of 6 cars leads to dangers on road as the site is located up a hill, metres from a blind bend and a busy junction; restrictive visibility; no turning within site for cars; doubtful 6 bays will fit; no visitor parking; excess parking will spill on to road; need for electric charging points;	Officers consider the level of on-site parking and bicycle provision to be appropriate and that detailed planning conditions would secure suitable and safe vehicle movement to and from the site. Refer to paragraph 8.229--8.28 of this report.
<i>Construction</i>	
Extent of building works in the area will lead to increase noise, disruption; impact on residents who are elderly in terms of health safety and wellbeing	Disruption during build will be minimised through an approved Construction Management Plan. Refer to paragraph 8.31 of this report.
<i>Sustainable issues</i>	
No details of how front approach would allow absorption of rainwater; substantial additional storming in an area with flooding; inclusion of chimney add to pollution problems	A detail informative would ensure that the development would incorporate sustainable requirements and the Council Code of Practice of the control of pollution. Refer to paragraph 8.23 and 8.32 of this report.
<i>Loss of Wildlife and Trees</i>	
The proposal would result in loss of wildlife; impact on habitats; excavation impact on trees boarding the property.	Officers consider that suitable condition to ensure details of trees protection measures are submitted should safeguard neighbouring trees. See paragraph 8.16

<i>Non material issues</i>	
Devalue property prices in the area. Character would start going into flat land with roads clogged with parking; greed of developers; speculative and unrealistic; financial gain not to enhance environment or aesthetic impact; excavation will affect foundations; concern over pre-app process and notification process of application	Not a material planning consideration

6.4 Councillor Simon Brew has made the following representations:

- There are many factual flaws in the documentation, and they can't even spell PURLEY correctly.
- This wide peaceful residential road currently has no flatted developments in its entire length, and it would set an extremely unfortunate precedent if one were to be permitted on this site.
- This application will destroy the attractive front garden which is very similar to those of most of its neighbours.
- The documentation completely ignores the fact there are extremely steep hills at both ends of the road, thus making cycling virtually impossible for all but Olympic challengers.
- I note that PTAL rating is not stated; I imagine that it's no better than 1B? It should be stated in the documentation.
- Para 2.4 of the Design & Access statement is factually incorrect and totally misleading about what public transport is or is not readily accessible from this site. There's no mention of the bus along Downs Court Rd, and I challenge anyone to commute to Sutton by public transport from this address; it would take at least one hour even though it's only 6.4 miles.
- Paras 10.1 & 10.2 are untrue.

7 RELEVANT PLANNING POLICIES AND GUIDANCE

In determining any planning application, the Council is required to have regard to the provisions of its Development Plan so far as is material to the application and to any other material considerations and the determination shall be made in accordance with the plan unless material considerations indicate otherwise. The Council's adopted Development Plan consists of the Consolidated London Plan 2015, the Croydon Local Plan: Strategic Policies 2013 (CLP1), the Croydon Replacement Unitary Development Plan 2006 Saved Policies 2013 (UDP) and the South London Waste Plan 2012.

Government Guidance is contained in the National Planning Policy Framework (NPPF), issued in March 2012. 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 1)
- Promoting sustainable transport (Chap 9)
- Delivering a wide choice of high quality homes (Chap 6)
- Requiring good design (Chap 7)
- Meeting the challenge of climate change, flooding and coastal change (Chap10).
- Conserving and enhancing the natural environment (Chap 11)

The main policy considerations raised by the application that the Committee are required to consider are:

Consolidated London Plan 2015 (LP):

- 3.3 Increasing housing supply
- 3.4 Optimising housing potential
- 3.5 Quality and design of housing developments
- 3.8 Housing choice
- 3.9 Mixed and balanced communities
- 5.2 Minimising carbon dioxide
- 5.3 Sustainable design
- 5.12 Flood risk management
- 5.14 Water quality and wastewater infrastructure
- 5.17 Waste capacity
- 6.3 Assessing effects of development on transport capacity
- 6.9 Cycling
- 6.13 Parking
- 7.4 Local character
- 7.6 Architect

Croydon Local Plan: Strategic Policies 2013 (CLP1):

- SP2 Homes
- SP2.2 Quantities and locations
- SP2.5 Mix of homes by size
- SP2.6 Quality and standards
- SP4.1 Urban design and local character
- SP6.1 Environment and Climate Change
- SP6.2 Energy and carbon dioxide reduction
- SP6.6 Sustainable design and construction
- SP4.2 Flooding
- SP6.6 Waste management
- SP8.1 Transport and communication
- SP8.6 Sustainable travel choice
- SP8.15 Parking

Croydon Replacement Unitary Development Plan 2006 Saved Policies 2013 (UDP)

- (UD1) High Quality and Sustainable Design
- (UD2) Layout and Siting of New Development
- (UD3) Scale and Design of New Buildings
- (UD7) Inclusive Design

- (UD8) Protecting Residential Amenity
- (UD13) Parking Design and Layout
- (UD14) Landscape Design
- (UD15) Refuse and Recycling Storage
- (EP5-EP7) Water – Flooding, Drainage and Conservation
- (T2) Traffic Generation from Development
- (T3) Pedestrians
- (T4) Cycling
- (T8 and T9) Parking
- (T11) Road Safety
- (H2) Supply of new housing
- (UD9 and H10) Residential Density

Supplementary Planning Guidance as follows:

- National Technical Standards

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. Housing/Affordable Housing/Mix/Tenures
3. Housing Quality/Daylight & Sunlight for future occupiers
4. Townscape and visual impact and consideration of density
5. Residential Amenity Issues
6. Transport
7. Sustainability
8. Waste
9. Flooding

Principle of Development

8.2 The application site comprises of a bungalow building with accommodation in the roof space, which has previously been extended at ground floor level. The proposal includes a replacement two-storey structure with rooms in the roof and basement.

8.3 Neighbours have identified that only one other property at (41 Selcroft Road) has been divided into flats and that the characteristic of the Selcroft Road would change from bungalows and large single family properties to blocks of flats which would result in the loss of attractive family housing stock. Notwithstanding these views, the principle involving the removal of the bungalow to be replaced with a larger sized building whilst retaining common characteristics in terms of building form and appearance, has already been established across several sites within the Borough. This approach would maximise the potential of the site whilst retaining the general residential use/character of the area. A replacement family unit would be provided as part of the proposed development.

8.4 It is therefore considered that subject to consideration of the other relevant material planning considerations, the principle of the redevelopment and specifically the

introduction of flatted accommodation would be acceptable – helping to deliver on the required housing targets.

Housing Mix

The proposed development would provide a combination of 2 one bedroom flats 4 two bedroom flats and a three bedroom flat. CLP1 Policy SP2.5 sets out an aspiration for 60% of all new homes outside the Croydon Opportunity Area to have three or more bedrooms and setting a preferred mix on individual sites through the CLP detailed policies and proposals. Whilst, in policy terms, the proposed mix would be below this target, the proposal would still provide a range of housing, including a family sized flat (suitably sized for 6 persons).

Housing Quality/Daylight and sunlight for future occupiers

- 8.5 All seven flats would accord with the Mayoral Guidelines housing standards in terms of floor space requirements. Each of flats would have more than one form of outlook and should receive good levels of sunlight and daylight. Whilst it is acknowledged that the 1 bedroom flat in the roof space would be only served by rooflights, the applicant has demonstrated through section drawings that the proposed rooms at this level would enjoy some outlook which is considered acceptable on balance.
- 8.6 Three of the four flats at basement and ground floor level will each have private garden space which would be supplemented by access to the large rear communal garden. The large communal garden would also serve the three top floor flats which would be accessed from the front down the side pathway along the left of the building. The combination of the private areas and communal garden would be in excess of Mayoral minimum guidelines. The proposal would include extensive landscaping and planting including pedestrian route along the left of the building new trees/shrubs, the details of which would be secured by condition.

Townscape and Visual Impact and Density

- 8.7 In general townscape terms the surrounding area is residential in character. The surrounding residential properties comprise detached and semi-detached dwelling houses of various heights and depths, set back from the main road and within large garden plots. Selcroft Road is characterised by a noticeable fall in land level, sloping from south to north.
- 8.8 The demolition of the existing bungalow and garage does not give rise to any concerns in design terms.
- 8.9 The proposed building would be located between two neighbouring sites. To the south of the application site lies the neighbouring property at 49 Selcroft Road which is a bungalow with accommodation within the roof slope and lies at an angle to the neighbouring properties at an elevated level (between 2.5-3.5m). To the north of the application site lies 53 Selcroft Road which is a part single/two storey detached house at a slightly lower level than the application property, with a difference in land levels (of between 0.3 to 0.4m).
- 8.10 The excavation of the site area would mean that the proposed building would have a maximum height of 9.3m (5.3m at eaves level) and would be 3.6m higher than the present bungalow. Although the proposal would introduce a building of larger mass it would for most part occupy the same footprint as the existing bungalow. The

difference in land levels (ranging between 2.3 -3.2m) between 49a and 53 Selcroft Road and the height of this neighbouring property would mean that the proposed development would be of comparable height with these neighbouring properties although slightly higher than neighbouring property at 53 Selcroft Road. Similarly, whilst certain elements of the proposed building would project beyond the rear building line of the neighbouring properties, the rear parts of the proposed building would be set in from the boundaries and would not be overly dominant (in terms of scale, mass and appearance)

- 8.11 Whilst the additional height and floorspace would increase the overall bulk massing of development, the position of the building would ensure that suitable separation would be maintained between neighbouring properties. The applicant has provided contextual elevations to demonstrate that the proposal would be of a suitable massing and scale when viewed from Selcroft Road and from neighbouring rear properties. The proposed excavated area would be partially visible from the front while to the rear, the basement level would only be visible from elevated positions of neighbouring properties.
- 8.12 The proposed building would have pitch roof design with bay window features and would include many of the design characteristics found along similar properties within the immediate area. The proposal has been amended to include roof lights instead of dormers within the main roof to maintain the sloping roof form and pitch roofs. The inclusion of chimney; appropriately sized windows and screening at basement level would give the overall appearance of a large detached house and would appear similar in character to other nearby properties. Details of materials and finishes would be controlled by condition. Overall the building is considered to be acceptable from a design and appearance point of view.
- 8.13 The new building would be set back 12m into the site with parking, refuse and bicycle storage forming the entrance approach off Selcroft Road. A number of objections have raised concern over the loss of the attractive garden and the extent of development to the rear. The removal of the existing garage and the proposed excavation would create a new level of vehicle entry and pedestrian approach to the site. The new approach would change the appearance to the front of the building. However the applicant has proposed that the front landscaped be designed to include hedging, planting and front boundary treatment around the perimeter of the site to soften the development at this point. Details of the landscaping including permeability of surface coverings and safety measure to the front light-well would be controlled by planning condition, to ensure that there is appropriate treatment and suitable softening to this area. Similar landscaping is proposed to the rear of the site.
- 8.14 Overall the proposed development would maintain the spatial relationship between the site and its surrounding context with the immediate neighbouring properties. The proposed building would provide a front private entrance and garden introducing defensible space adjacent to the public pavement which would respond positively both visually and physically to the local context making a positive approach to the street scene.
- 8.15 The proposal would retain a sizeable garden area to the rear of this building. At least 75% of the existing garden minus the rear lightwell areas at basement level would be retained as part of the proposal with the proposed development set significantly away from neighbouring trees so as to not cause concern. Due to changing levels at the rear of this site the proposal would include new shrubs and natural planting adjacent

to the rear boundary edge to protect privacy for potential users while securing natural cover along neighbouring boundaries.

- 8.16 Representations have raised concern over the intensification of the site and overdevelopment. The site is a suburban setting with a PTAL rating of 0. With a site area of 0.1 ha, the proposed density would be 70 units/ha 200 habitable rooms/ha. Table 3.2 of the London Plan sets a density range of u/ha and hr/ha if between 50-75u/ha and 150-200hr/ha. The proposal would be within this density range and the London Plan advises that density ranges should not be applied mechanistically. The range for a particular location is broad enabling account to be taken of other factors including local context, design and transport capacity which, where appropriate, can provide a tool for increased density in certain situations. It is considered that in view of the sites location, design, transport capacity and parking provision the density range is justified. The proposal would therefore accord with London Plan requirements in promoting housing.

Residential Amenity Issues

- 8.17 The proposal would not result in undue loss of daylight or sunlight for occupiers of 49a and 53 Selcroft Road. A single obscured glazed window at first floor level is proposed to be included within the side elevation (facing towards 49a Selcroft Road) but should not result in overlooking or loss of privacy for this neighbour. Whilst the proposal would be larger than the present building when viewed from the rear garden of 49a Selcroft Road, the additional massing would not be unduly dominant and the hipped roof form would reduce its overall visual impact. Whilst the proposal would increase the number of windows to the rear, the rear garden of 49a Selcroft Road is already currently overlooked from the first floor windows of the existing property.
- 8.18 The proposal would extend beyond the main building of 53 Selcroft Road and would bring the building closer towards this neighbour. However, adequate separation distances would prevail – especially in view of the existing boundary treatments and the reinforcement of planting along this neighbouring boundary. The windows contained within the flank elevation of 53 Selcroft Road are either secondary windows of windows to non-habitable rooms. The occupiers of 53 Selcroft Road have confirmed that they consider the landscaping and design to be aesthetically pleasing and that the proposal would respect privacy. A condition restricting the first floor level side windows towards 53 Selcroft Road to be in obscured glazing should protect neighbours privacy.
- 8.19 The proposed development would be between 35m and 40m from the rear elevations of properties in Purley Hill (1 and 3 Purley Hill). The rear gardens of these properties fall significantly towards the north. The change in levels mean that the proposed building would only be readily visible from the first floor levels of properties in Purley Hill and at a considerable distance away. Given such significant separation the proposal would not have a dominant or overbearing impact for these occupiers. Furthermore, the existing bungalow already overlooks these rear gardens. The proposed development would introduce more windows at the first floor but at a similar height level as the existing bungalow windows. The inclusion of velux roof lights within the roof would be angled. The applicants have proposed similar hedging to that along 53 Selcroft Road to provide natural screening of the site boundary with 1 Purley Hill which would help screen the top floor level of the proposed building and provide additional privacy to the rear garden with this neighbour.

8.20 The proposed development would be between 37m to 45m from opposing properties (67 Oakwood Avenue and 56 Selcroft Road) opposite towards the east. The proposal would not result in undue loss of light, outlook or privacy. In view of the residential setting, it is not considered that the proposal would result in undue loss of amenity in terms of noise disturbance. It is acknowledged that there will be increased activity to the site and some noise and disturbance during the construction process, with pollution also a concern expressed by neighbours. However, any construction nuisance would be temporary in nature. A planning informative is recommended to advise the applicant to follow the Councils "Code of Practice on the Control of Noise and Pollution from Construction Sites".

Transport

8.21 The site is located within an area of PTAL 0 which is the lowest rating. Neighbours have raised concern over potential visitor parking, the lack of parking provided for the development and the impact of vehicle access in relation to safety issues due to the proximity of the nearby bend when approaching the site from the south. The London Plan allows for greater flexibility for increased car ownership in parts of Outer London with low PTALs, this needs to be balanced against the impact of increased site coverage by hard surfacing and the need for communal amenity space and quality landscaping.

8.22 Selcroft Road is predominantly characterised by off street parking with minimum on street parking along a generally wide road network. The proposed development would include a parking area at the front of the site for 6 cars. The proposed development would lead to some intensification of use of the site access and the applicant has demonstrated that vehicles will be able to safely access the site and reverse within the front approach in order to leave in forward gear. There is also some capacity for on street car parking in and around Selcroft Road. Due to the proximity of the bend details of the swept path analysis and site lines would be controlled by condition to ensure that there is suitable vehicle access and egress. Visitor parking is not considered to be an issue with significant gaps possible along the road. The proposal would also provide 9 cycle spaces in line with Council requirements for cycle provision and encouraging sustainable modes of transport the details of which are to be conditioned.

8.23 The proposed level of parking and cycle provision is considered to be acceptable as are the layout arrangements in view of the sites requirements.

8.24 The applicant is to meet the cost of any new access improvements associated with the development. Furthermore the introduction of visibility splays would ensure that vehicles leaving the site in forward gear.

Sustainability

8.25 The development would need to achieve a reduction in carbon dioxide emissions of 19% beyond the 2013 Building Regulations and demonstrate how the development will achieve a water use target of 110 litres per head per.

Waste

8.26 The proposed plans indicate the location for the waste storage facilities in an appropriate enclosure within a reasonable distance for collection. It is considered that

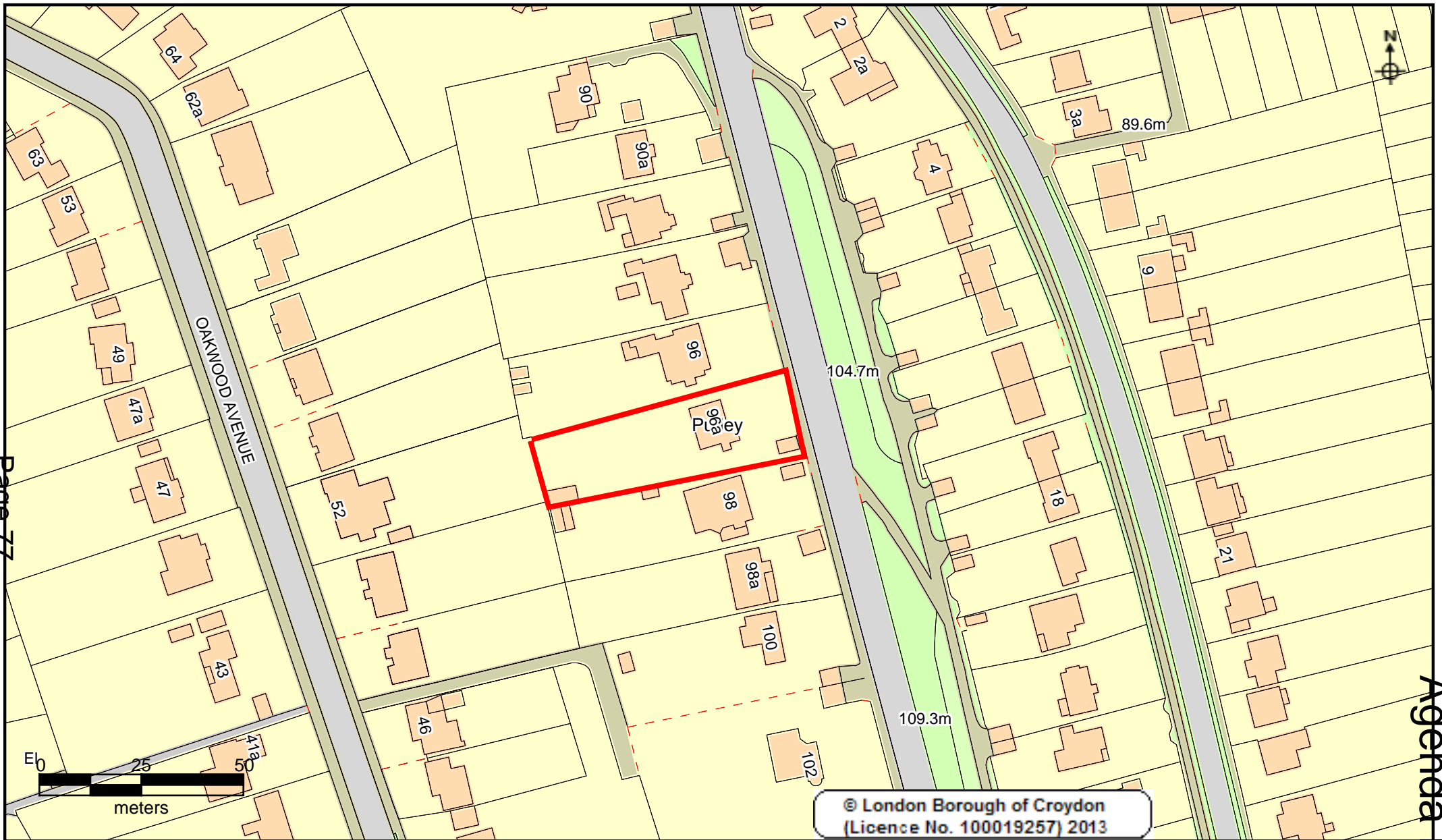
the proposed bin storage is acceptable. In order to ensure that a suitable level of bin provision is provide a condition requiring details of this space should ensure that the proposal is in line with policy requirements.

Flooding:

- 8.27 The property has been identified as being located within an area subject to surface water flooding (1 in 1000yrs). The proposed development would therefore need to ensure that suitable SUDS measures are introduced to safeguard against potential flooding. The details of such measures would be controlled subject to condition in order to ensure that the proposal complies with the principles of the NPPF in meeting flooding requirements; London Plan policy 5.12 flood risk management; CLP1 policy SP4.2 flooding and UDP Policies EP5-EP7 flooding/drainage and conservation.

Conclusions

- 8.28 The recommendation is to grant planning permission.
- 8.29 All other relevant policies and considerations, including equalities, have been taken into account.



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CROYDON COUNCIL

London Borough Croydon

Scale 1:1250

21-Nov-2017



PART 6: Planning Applications for Decision

Item 6.2

1.0 SUMMARY OF APPLICATION DETAILS

Ref: [17/04385/FUL](#) (*Link to associated documents on Planning Register*)
 Location: 96A Riddlesdown Road, Purley CR8 1DD
 Ward: Purley
 Description: Demolition of the existing building and the erection of a two storey building including basement and with additional accommodation in roofspace comprising of 5 x two bedroom flats and 3 x three bedroom flats: formation of associated access, and provision of 8 parking spaces, cycle storage and refuse store BX16-S1-102;
 Drawing Nos: BX16-S1-103D; BX16-S1-104; BX16-S1-105; BX16-S1-106; BX16-S1-107; BX16-S1-108; BX16-S1-109; and BX16-S1-110.
 Mr Rafael Porzycki (Aventier Ltd)
 Applicant: N/A
 Agent: Robert Naylor
 Case Officer:

	studio	1 bed	2 bed	3 bed	4 bed
Apartments	0	0	5 (3 person)	3 (4 person)	0

All units are proposed for private sale

Number of car parking spaces	Number of cycle parking spaces
8 (including one disabled space)	16

1.1 This application is being reported to committee because the ward councillor Brew and Riddlesdown Residents Association made representations in accordance with the Committee Consideration Criteria and requested committee consideration and objections above the threshold in the Committee Consideration Criteria have been received.

2.0 RECOMMENDATION

- 2.1 That the Planning Committee resolve to GRANT planning permission
- 2.2 That the Director of Planning and Strategic Transport has delegated authority to issue the planning permission and impose conditions and informatives to secure the following matters:

Conditions

- 1. Development to be carried out in accordance with the approved drawings and reports except where specified by conditions
- 2. Materials to be submitted
- 3. Details of Refuse/Cycles/Boundary/Electric vehicle charging point to be submitted
- 4. Car parking provided as specified
- 5. Obscured glazed windows
- 6. No additional windows in the flank elevations
- 7. Hard and soft landscaping to be submitted to incorporate SuDS

8. 19% Carbon reduction
9. 110litre Water usage
10. Permeable forecourt material
11. Section 278 Agreement required
12. Visibility Splays
13. Construction Logistics Plan to be submitted
14. Time limit of 3 years
15. Any other planning condition(s) considered necessary by the Director of Planning and Strategic Transport

Informatives

- 1) Removal of site notices
- 2) Community Infrastructure Levy
- 3) Code of practise for Construction Sites
- 4) Wildlife protection
- 5) Any other informative(s) considered necessary by the Director of Planning and Strategic Transport

3.0 PROPOSAL AND LOCATION DETAILS

3.1 The proposal includes the following:

- Demolition of existing detached house
- Erection of a two storey building including basement and with additional accommodation in roofspace
- Provision of 5 x two bedroom flats and 3 x three bedroom flats fronting Riddlesdown Road.
- Provision of 8 off-street spaces with associated access via Riddlesdown Road.
- Provision associated refuse/cycle stores

Site and Surroundings

- 3.4 The application site is a large detached property located on the western side of Riddlesdown Road located within a fairly generous plot. The topography of the site is very undulating with the ground sloping away from south to north and also sloping up from east (front) to west (back) of the property. The existing property sits on an elevated position with a garage at the front of the site, which is lower than the host property, and the rear garden set up significantly higher than at the front of the property.
- 3.5 The surrounding area is mainly residential area and the current host property and many of the properties here occupy fairly generous plot sizes. There is no distinct style in regard to the properties along Riddlesdown Road and the host property appears to be a more modern interpretation of the existing properties. The majority of properties appear to be single family dwellinghouses.
- 3.6 The site is located within an archaeological priority zone (APZ), Riddlesdown Road is a Local Distributor Road and a small section of the site is located within an area of surface water flood risk.

Planning History

3.7 There is no planning history associated with the site.

4.0 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The principle of the development is acceptable given the residential character of the surrounding area.
- The design and appearance of the development is appropriate given the context of the site and is similar to a recent approval at 122 Riddlesdown Road (Ref: 17/02724/FUL).
- The living conditions of adjoining occupiers would be protected from undue harm subject to conditions.
- The living standards of future occupiers are satisfactory and Nationally Described Space Standard (NDSS) compliant
- The impact upon highway safety and efficiency is considered acceptable and can be controlled through a condition.
- Sustainability aspects can be controlled by condition

5.0 CONSULTATION RESPONSE

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

6.0 LOCAL REPRESENTATION

6.1 The application has been publicised by 8 letters of notification to neighbouring properties in the vicinity of the application site. The number of representations received from neighbours, local groups etc in response to notification and publicity of the application are as follows:

No of individual responses: 35 Objecting: 32 Supporting: 2 Comment: 1

6.2 The following issues were raised in representations. Those that are material to the determination of the application, are addressed in substance in the MATERIAL PLANNING CONSIDERATIONS section of this report:

- Not in keeping with the surrounding area
- Spoil the visual amenity
- Inadequate parking spaces
- Increase in traffic
- Over development
- Poorly designed
- Impact on road safety
- Loss of privacy/overlooking
- Increase in noise and disruption
- Increase impacts on local infrastructure
- Description of the development is misleading
- Loss of trees and vegetation

6.3 Ward Councillor Simon Brew has made the following objection to the scheme:

- Poor quality of information supporting the application.
- Misleading description of the number of storeys
- Incorrect PTAL rating
- Over intensification of the existing residential area
- Detrimental impact upon residential amenity;
- Too dominant in visual perspective
- Out of character with the existing streetscape.
- Overshadowing
- Car parking causes unacceptable harm to the setting of building and the character of the local area
- Not enough parking on-site
- Loss of family home and affordable homes
- Community Infrastructure Levy will make provision for additional infrastructure

6.4 Riddlesdown Residents' Association (RRA) have objected to the scheme and made the followings representations:

- Poor quality of information supporting the application
- Misleading number of storeys
- Incorrect PTAL rating
- Over intensification within the existing residential area
- Unacceptable bulk size and massing
- Detrimental impact on amenity
- Lack of disabled facilities
- On/off site car parking
- Impacts on the Local Distributor Road
- Loss of family home
- Refuse arrangements
- Fire Risk
- Flooding impacts
- Cumulative impact of applications for flats

6.5 Two letters of support has been received suggesting:

- Protects the green belt by making better use of existing developed land.
- Designed to be in keeping with the houses in the area
- Respects the separation distances between houses
- Protects the privacy of adjoining neighbours by way of design and position of windows.
- Provides adequate on-site parking
- Provides an alternative mix of homes
- Provides jobs

7.0 RELEVANT PLANNING POLICIES AND GUIDANCE

7.1 In determining any planning application, the Council is required to have regard to the provisions of its Development Plan so far as is material to the application and to any other material considerations and the determination shall be made in accordance with the plan unless material considerations indicate otherwise. The Council's adopted

Development Plan consists of the Consolidated London Plan 2015, the Croydon Local Plan: Strategic Policies 2013 (CLP1), the Croydon Replacement Unitary Development Plan 2006 Saved Policies 2013 (UDP) and the South London Waste Plan 2012.

7.2 Government Guidance is contained in the National Planning Policy Framework (NPPF), issued in March 2012. 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:

- Promoting sustainable transport;
- Delivering a wide choice of high quality homes;
- Requiring good design.

7.3 The main policy considerations raised by the application that the Committee are required to consider are:

7.4 Consolidated London Plan 2015

- 3.3 Increasing housing supply
- 3.4 Optimising housing potential
- 3.5 Quality and design of housing developments
- 3.8 Housing choice
- 5.1 Climate change mitigation
- 5.2 Minimising carbon dioxide emissions
- 5.3 Sustainable design and construction
- 5.12 Flood risk management
- 5.13 Sustainable drainage
- 5.16 Waste net self sufficiency
- 6.3 Assessing effects of development on transport capacity
- 6.9 Cycling
- 6.13 Parking
- 7.2 An inclusive environment
- 7.3 Designing out crime
- 7.4 Local character
- 7.6 Architecture
- 7.8 Conservation of archaeological interest
- 7.21 Woodlands and trees

7.5 Croydon Local Plan: Strategic Policies 2013 (CLP1):

- SP1.1 Sustainable development
- SP1.2 Place making
- SP2.1 Homes
- SP2.2 Quantities and location
- SP2.5 Mix of homes by size
- SP2.6 Quality and standards
- SP4.1 and SP4.2 Urban design and local character
- SP6.1 Environment and climate change
- SP6.2 Energy and carbon dioxide reduction

- SP6.3 Sustainable design and construction
- SP6.4 Flooding, urban blue corridors and water management
- SP8.6 & SP8.7 Sustainable travel choice
- SP8.12 Motor vehicle transportation
- SP8.17 Parking

7.6 Croydon Replacement Unitary Development Plan 2006 Saved Policies 2013 (UDP):

- UD2 Layout and siting of new development
- UD3 Scale and design of new buildings
- UD6 Safety and security
- UD7 Inclusive design
- UD8 Protecting residential amenity
- UD13 Parking design and layout
- UD14 Landscape design
- UD15 Refuse and recycling storage
- NC4 Woodlands, trees and hedgerows
- T2 Traffic generation from development
- T4 Cycling
- T8 Parking
- H2 Supply of new housing

7.7 There is relevant Supplementary Planning Guidance as follows:

- London Housing SPG March 2016

7.8 The Partial Review of Croydon Local Plan: Strategic Policies (CLP1.1) and the Croydon Local Plan: Detailed Policies and Proposals (CLP2) was approved by Full Council on 5th December 2016 and was submitted to the Planning Inspectorate on behalf of the Secretary of State on 3rd February 2017. The examination in public took place between 16th May and 31st May 2017. Main modifications have been received from the Planning Inspector and the Council are consulting on these modification during the period 29th August – 10th October 2017.

7.9 According to paragraph 216 of the NPPF, relevant policies in emerging plans may be accorded weight following publication, but with the weight to be given to them is dependent on, among other matters, their stage of preparation. Now that the main modifications to CLP1.1 and CLP2 have been published for consultation, there are certain policies contained within these plans that are not subject to any modifications and significant weight may be afforded to them on the basis that they will be unchanged when CLP1.1 and CLP2 are adopted.

8.0 MATERIAL PLANNING CONSIDERATIONS

8.1 The main planning issues raised by the application that the Planning Committee are required are as follows:

1. Principle of development
2. Townscape and visual impact
3. Housing quality for future occupiers
4. Residential amenity for neighbours

5. Access and parking
6. Sustainability and environment
7. Trees and landscaping
8. Archaeological Priority Zone (APZ)
9. Other matters

Principle of Development

- 8.2 The appropriate use of land is a material consideration to ensure that opportunities for development are recognised and housing supply optimised. The application is for a flatted development providing additional high quality homes within the borough, which the Local Planning Authority (LPA) is seeking to promote. Furthermore the scheme would provide the provision of 3 x three bedroom units, which the borough has an identified shortage of, and is seeking to provide throughout the borough.
- 8.3 The site is located within an existing residential area and as such providing that the proposal respects the character and appearance of the surrounding area and there are no other impact issues the principle is supported.

Townscape and Visual Impact

- 8.4 The existing unit does not hold any significant architectural merit and therefore the demolition can be supported. The proposal is for the demolition of the existing property and the erection of a new flatted development that would consist of 8 units (five x 2 bedroom units and three x 3 bedroom units).
- 8.5 The application is very similar in size and scale to a recently approved scheme at 122 Riddlesdown Road (Ref: 17/02724/FUL). Representations have been made in respect to the description of the development in that the application should be defined as a four storey development. Whilst it is acknowledged that the proposal would consist of units being located within a basement level and the roofspace, the appearance of the property from the front would be akin to a two storey property, given that the eaves and ridge heights are similar to the adjoining properties. In terms of character and appearance the property would read more as a large detached house rather than a “block of flats” and as such would not appear out of keeping in the surrounding area.
- 8.6 The design of the building incorporates a traditional styled appearance consisting of three gables to the front elevation and two bay elements in order to appear in keeping with the main streetscene with appropriate materials (plain clay hung tiles, render, white timber framed windows and clay roof tiles) with an adequate balance between brick and glazing and appropriate roof proportions. The main front element contains a traditional feel, and will consist of gabled bays which are features of the surrounding area and the eaves height similar to the adjoining properties would fit into the wider townscape.
- 8.7 The main differences between the existing property and the proposal is highlighted by the increase in the height and the depth of the new building. In terms of the height the ridge line has been increased by approximately 1.5m. Given the topography of the site and the fact that both adjoining properties at 96 and 98 Riddlesdown Road are higher than the existing building the proposed height is appropriate in this case. In respect to the increase in the depth footprint will increase to accommodate the large rear extension at the site which consists of a lower and upper ground floor level which is comparable to a large householder rear extension. However, the front elevation will sit

in a similar position as the existing front elevation and as such would not project forward of the existing building line and the scheme will not appear as an intrusive feature to the streetscene.

- 8.8 Currently there is no basement underneath the existing dwellinghouse, however the site is built in a steep slope meaning that the rear garden is significantly higher than the roadside to the front of the property. The proposed scheme is to build a basement under its entire footprint with a moderate projection at the rear to create semi-private amenity areas for the units located at this level. There are examples along Riddlesdown Road where the slope has been utilised for garages and retaining walls, and as such the principle of an additional subterranean level is acceptable.
- 8.9 The application site has a large rear garden which is not visible from the public highway or any public vantage points. The alterations at the rear of the site including the two storey (partially subterranean) rear extension would have limited visual impact on the character of the locality due the indirect visibility available from public view. The rear element has been designed to appear subservient to the main property and has been set off the side boundaries and the upper floor has been set back from the rear, again to provide a degree of subservience.
- 8.10 As with the adjoining properties, the proposed building would be centrally located and this setting ensures that the development does not appear overly cramped in its plot. The frontage would be given over to hard-standing to allow for off street parking for the new dwellings, however there are areas of soft landscaping at the ground floor and along the boundary of the site. This would reflect the arrangement of the neighbouring buildings and would be acceptable.
- 8.11 Given the overall scale of the development, the extent of hardstanding would not be excessive. The site offers sufficient opportunities for soft landscaping to the rear and Riddlesdown Road frontage as well as between the proposed development and the neighbouring property to the rear.
- 8.12 Representations have raised concern over the intensification of the site and overdevelopment. The site is a suburban setting with a PTAL rating of 1a and as such the London Plan indicates that the density levels ranges of 150-200 habitable rooms per hectare (hr/ha) and the proposal would be slightly in excess of this range at 210 hr/ha. However, the London Plan further indicates that it is not appropriate to apply these ranges mechanistically, as the density ranges are broad, to enable account to be taken of other factors relevant to optimising potential – such as local context, design and transport capacity. These considerations have been satisfactorily addressed, the London Plan provides sufficient flexibility for such higher density schemes to be supported.
- 8.13 The application site is a substantial plot within an established residential area and is comparable in size to other flatted and neighbouring back-land developments approved throughout the borough including the recently approved scheme at 122 Riddlesdown Road. The scale and massing of the new build will generally be in keeping with the overall scale of development found in the immediate area and the layout of the development respects the pattern and rhythm of neighbouring area, and would result in a high quality design that does not detract from the character of the area.

8.14 Having considered all of the above, against the backdrop of housing need, officers are of the opinion that the proposed development would comply with the objectives of the above policies in terms of respecting local character.

Housing Quality for Future Occupiers

8.15 The proposal would comply with internal dimensions required by the Nationally Described Space Standards (NDSS) and all units are in excess of the minimum GIA requirements as set out in the NDSS, as highlighted in the following table:

Unit	Bedrooms	GIA	NDSS requirement (GIA)
1	2	70 sqm	61 sqm
2	3	71 sqm	74 sqm
3	2	74 sqm	61 sqm
4	2	62 sqm	61 sqm
5	2	81 sqm	61 sqm
6	2	81 sqm	61 sqm
7	3	81 sqm	74 sqm
8	3	81 sqm	74 sqm

8.16 The internal layouts would be acceptable with adequate room sizes and a large open plan living, kitchen and dining area and includes the provision of 3 x three bed roomed units. With regard to external amenity space, the London Housing SPG states that a minimum of 5sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1sqm for each additional unit. Units 1-4 have access to private amenity space in excess of minimum standards, whilst the remaining properties have access to the communal gardens at the rear of the site. The proposal has been designed to be in keeping with the surrounding area; the provision of private balconies is not a feature of the area and has the potential to impact on the amenities of the adjoining residents, as no private balconies/terraces are proposed.

8.17 In terms of accessibility, level access would be provided to the front door and there is a lift installed in the property for access from the lower ground floor level to the upper floors as necessary and an external lift for access to the rear garden, ensuring that the proposal is fully accessible. A disabled space is proposed for the parking area.

8.18 The development is considered to result in a high quality development offering a variety of housing types including 3 x 3 bedroom units all with adequate amenities and provides a good standard of accommodation for future occupiers.

Residential Amenity for Neighbours

8.19 In terms of the proposal the properties that are most affected adjoining properties at 96 and 98 Riddlesdown Road and the property adjoining the site to the rear at 52 Oakwood Avenue.

Impact on 96 and 98 Riddlesdown Road

8.20 The front building line of the proposal has been replicated and would be generally consistent with the existing properties on Riddlesdown Road. The main building will be set off both adjoining properties by at least 3.0m. The main new bulk of the proposal

adjoining these properties is experienced at the rear of the site with the basement and ground floor extensions. These elements have been centrally positioned and are in excess of 4m from both boundaries. Both properties adjoining the application site have a retaining wall with close board fencing and extensive vegetation along the boundaries, which should mitigate any issues of overlooking from the rear ground floor windows as the basement windows will not have any impact.

- 8.21 The ground floor flank elevations do contain windows serving habitable rooms however given the land level and the existing and proposed boundary treatments it is unlikely that they would provide either actual or perceived levels of overlooking and loss of privacy. There are no windows on the flank elevation at first floor levels. Nevertheless it is considered prudent to condition the application to the proposed fenestration to ensure that any future overlooking is mitigated along the flank elevations.
- 8.22 Both numbers 96 and 98 Riddlesdown Road have windows in the flank elevations adjoining the proposed site. Planning permission was granted in 2007 at number 98 Riddlesdown Road for the erection of single/two storey side extension which indicates that the upper floor windows serve non habitable rooms including a w/c and a stairwell.
- 8.23 There are a number of windows in the first floor flank elevation at number 96 Riddlesdown Road which appear to serve bedroom windows although these rooms appear dual aspect. There is also a large side dormer in 96 which serves a habitable room. The proposal includes no flank windows in the upper floors of the proposal, although there are rooflights on the flank roofs, however this could be conditioned to be obscured glazed and fixed shut above 1.70m from the relevant finished floor level to mitigate actual and perceived levels of overlooking and loss of privacy.
- 8.24 Whilst there would be a degree of overlooking as a consequence of the rear fenestration, this is not uncommon in a suburban location and would not be over and above that currently experienced from the site. Given the design, layout and separation between the properties the current boundary treatment and provision of a suitable landscaping scheme (secured by way of a planning condition) this is deemed acceptable to ensure no undue impact on the amenities of neighbouring properties.

Impact on 52 Oakwood Avenue

- 8.25 Given the topography of the site (sloping away from this site), the separation between the properties in excess of 50m and the significant landscaped boundary located between the this property and application site, this relationship is acceptable.
- 8.26 Given that the proposal is for a residential use in a residential area the proposed development would not result in undue noise, light or air pollution from an increased number of occupants on the site. Subject to conditions the proposed development is not visually intrusive or result in a loss of privacy.

Access and Parking

- 8.27 The location has a PTAL level of 1a which indicates poor level of accessibility to public transport links. The parking is generally unrestricted in the surrounding roads with spare capacity on street. The new unit would benefit from eight off street parking spaces including one designated disabled bay. However, the scale and nature of the development is such that it is likely to have a negligible impact adjoining highway network.

- 8.28 Maximum car parking standards as described in Appendix 2 of the Croydon UDP state that a maximum of 12 car parking spaces should be provided for the scheme as a whole. The Strategic Transport team has no objection in principle. Whilst not achieving these maximum standards, there would be a 1:1 parking ratio which would promote sustainable travel in the borough. In compliance with the London Plan, electric vehicle charging points should be installed in the parking area and this can be secured by way of a condition.
- 8.29 The applicant is proposing a single vehicle access and it is prudent to attach a condition to ensure that highway visibility splay standards are incorporated. The applicant would need to enter into a Section 184 agreement with Network Maintenance to construct the new crossover and remove the existing crossovers.
- 8.30 Cycle storage facilities would comply with the London Plan (which would require 16 spaces) as these are secure and undercover. However, consideration should be given to a more conventional layout with cycles attached to stands as it is sometimes difficult for wall stands to be used. There is scope for the space allocated for cycles and bin storage to be used more effectively, as such further details of these can be secured by way of a condition.
- 8.31 Concerns have also been expressed in regard to the amount and type of excavation required at the site and further details are required as part of a construction method statement. A Demolition/Construction Logistic Plan (including a Construction Management Plan) will be needed by LPA before commencement of work and this could be secured through a condition.

Environment and sustainability

- 8.32 Conditions can be attached to ensure that a 19% reduction in CO2 emissions over 2013 Building Regulations is achieved and mains water consumption would meet a target of 110 litres or less per head per day.
- 8.33 The site lies within a critical damage flood risk area and is sloping. Given the areas for landscaping there are opportunities for SuDS to be located in the communal areas. Officers are satisfied that these issues can be dealt with by condition.

Trees and landscaping

- 8.34 None of the trees on site are subject to a tree preservation order. The Council's Tree Officer raises no objection to the development subject to a suitably worded condition secured through the landscaping condition to mitigate any loss. The development would therefore have an acceptable relationship with trees on site and in neighbouring gardens.
- 8.35 The application site is not near an area of special scientific interest or a site of nature conservation value. From the officer's site visit, there is no evidence to suggest that any protected species are on site and as such further surveys are not deemed necessary.
- 8.36 With regard to wildlife, it is recommended for an informative to be placed on the decision notice to advise the applicant to see the standing advice by Natural England in the event protected species are found on site.

Archaeological Priority Zone (APZ)

8.37 The application site is located in an area of archaeological interest (Archaeological Priority Area) identified for the Local Plan: London to Brighton Roman Road. The Archaeological Priority Area was defined in the 2016 Archaeological Priority Area Review. The scheme has been reviewed by Greater London Archaeological Advisory Service (GLAAS) who have concluded that the proposal is unlikely to have a significant effect on heritage assets of archaeological interest and that no further assessment or conditions are necessary.

Other matters

8.38 Representations have been received raising issues of fire safety at the site, this is a building control matter.

8.39 Representations have raised concern that construction works will be disruptive and large vehicles could cause damage to the highway. Whilst it is acknowledged that the site could reasonably be accessed from Riddlesdown Road, it would be prudent to control details of construction through the approval of a Construction Logistics Plan. Overall however, it is not considered that the development would affect highway safety along the access road.

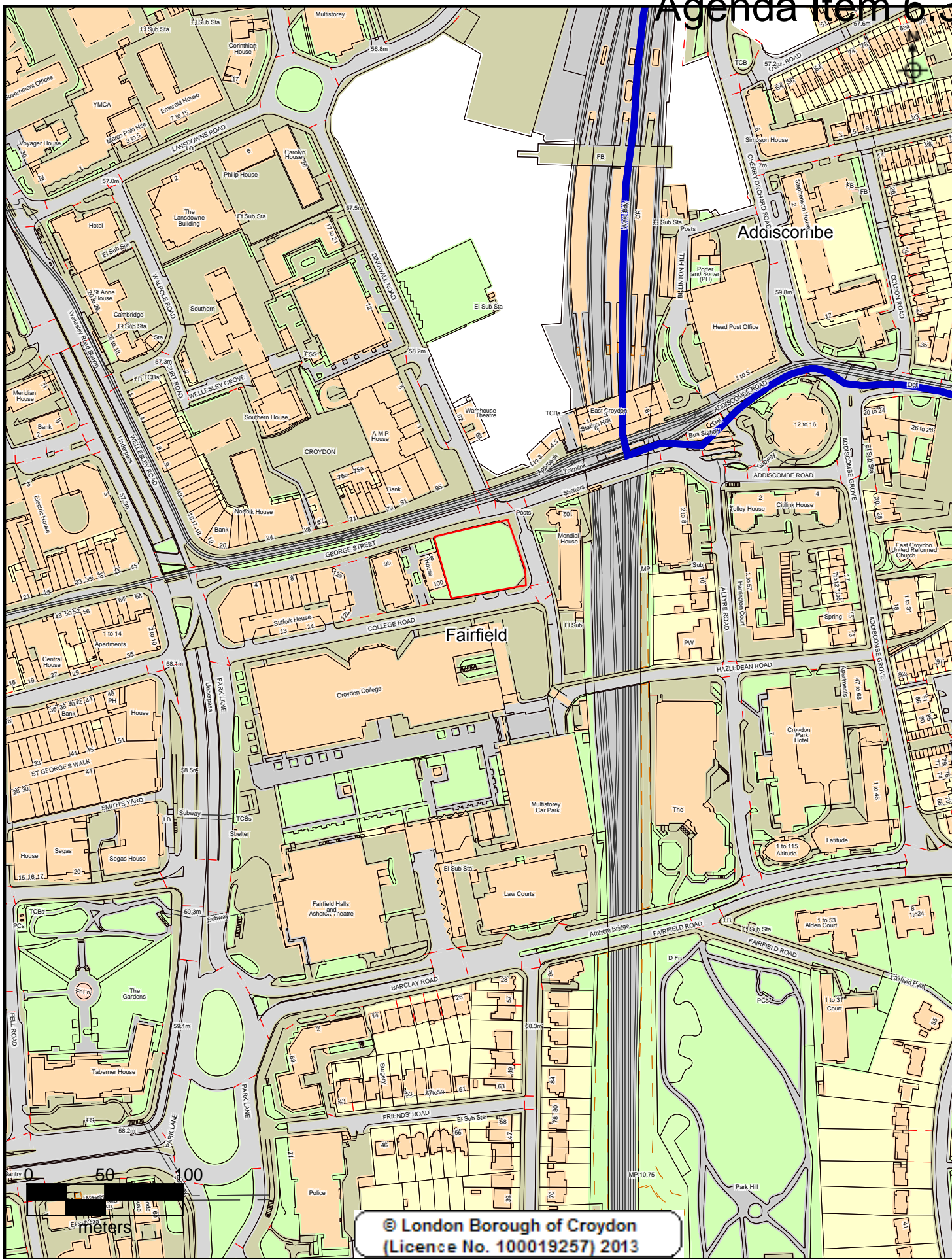
8.40 Representations have raised concerns that local schools and other services will be unable to cope with additional families moving into the area. The development will be liable for a charge under the Community Infrastructure Levy (CIL). This payment will contribute to delivering infrastructure to support the development of the area, such as local schools.

Conclusions

8.41 The principle of development is considered acceptable within this area. The design of the scheme is of an acceptable standard given the proposed and conditioned landscape and subject to the provision of suitable conditions the scheme is acceptable in relation to residential amenity, transport, sustainable and ecological matters. Thus the proposal is considered in general accordance with the relevant policies.

8.42 All other relevant policies and considerations, including equalities, have been taken into account.

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PART 6: Planning Applications for Decision

Item 6.3

1 SUMMARY OF APPLICATION DETAILS

Ref: [17/04201/FUL](#) (Link to associated documents on Planning Register)

Location: Former Essex House, 101 George Street, Croydon, CR0 1PJ

Ward: Fairfield

Description: Redevelopment of the site to provide a part 38 and part 44 storey building with 546 residential flats, with the ground floor to incorporate a flexible space including cafe (Class A3), business space (Class B1) and gallery space (Class D1) uses with basement accommodating 28 disabled parking spaces, cycle storage and refuse storage, and associated hard and soft landscaping.

Drawing Nos: GSC 100__ Site Location Plan_1-1250_A3; GSC 101__ Existing Site Plan_1-200_A1; GSC 102__ Consented Site Plan_1-200_A1; GSC 103__ Proposed Site Plan_1-200_A1; GSC 104__ George Street Elevation_1-1000_A1; GSC 2B1__ Basement 1; GSC 2B2__ Basement 2; GSC 2PO__ Podium; GSC 200__ Ground Floor; GSC 201__ Typical Floor (1-12); GSC 213__ Typical Floor (13-19); GSC 220__ Typical Floor (20-31); GSC 232__ Typical Floor (32-36); GSC 237__ Unique Floor (37); GSC 238__ Unique Floor (38); GSC 239__ Unique Floor (39); GSC 240__ Typical Floor (40-42); GSC 243__ Amenities Space (43); GSC 244__ Roof Plan; GSC 250_A_Elevation to George St_1-200_A1; GSC 251_A_Elevation West_1-200_A1; GSC 252_A_Elevation East_1-200_A1; GSC 253_A_Elevation to College Rd_1-200_A1; GSC 254__ Bay Details Tower A_1-50_A1; GSC 255__ Bay Details Tower B_1-50_A1; GSC 256__ Bay Details Winter Garden_1-50_A1; GSC 260__ Section AA_1-200_A1; GSC 261__ Section BB_1-200_A1; GSC 270__ Visualisation from George Street_A1; GSC 270__ Visualisation from George Street_A1; GSC 271__ Contextual Street Views_A1; GSC 272__ Winter Garden Views_A1; GSC 273__ Aerial View_A1; TID-GSC_HTA-L_XX-XX_DR_0900 Rev B; TID-GSC_HTA-L_XX-XX_DR_0901; TID-GSC_HTA-L_XX-XX_DR_0902 Rev A; and TID-GSC_HTA-A_2PO_C_Podium.

Applicant: Tide Construction Ltd

Agent: HTA

Case Officer: Michael Cassidy

	Studio	1 bed	2 bed	3 bed	Total
Market Rent	97	170	132	38	437
Discount Market Rent (Intermediate)	0	54	22	0	76
Discount Market Rent (London Living Rent)	0	23	10	0	33
Total	97	247	164	38	546

Type of floor space	Amount proposed
Residential (Class C3)	34,784.8sqm
Business (Class B1)	263.4sqm
Restaurants and Cafes (Class A3)	156.2sqm
Non-Residential Institutions (Class D1)	191.5sqm

Number of car parking spaces	Number of cycle parking spaces
28	786

1.1 This application is being reported to Planning Committee because the proposal is for a large scale major development.

2 BACKGROUND

2.1 An earlier iteration of this proposal was presented to the Planning Committee at the pre-application stage on 6th July 2017. This proposed the erection of two interlinked buildings of 30 and 40 storeys in height providing 490 residential units with ground floor commercial accommodation, an improved/expanded public realm and the provision of access off College Road and basement car parking.

2.2 Members made the following comments in relation to the above proposal:

- *“Comfortable with approach proposed;*
- *Like the overall direction and supportive of exploring proposals around delivering a greater number of more affordable units – including a mix of London Living Rents and rents set at 80% of open market rents;*
- *Nomination rights will be an important issue – the affordable housing should be for local people who need it;*
- *There is support for the winter garden at ground level, although this needed some detailed resolution;*
- *Interesting materials to be used;*
- *Ideally would have liked to see a non-residential building on this site, but acknowledged that the proposal has active frontages;*
- *Liked the mix of ground floor uses;*
- *Need to make sure there is proper provision for the needs of children”.*

2.3 Since the Committee presentation, the proposal has been further developed, in consultation with officers and the above comments have been taken into account in amendments made to the scheme.

3 RECOMMENDATION

3.1 That the Planning Committee resolve to GRANT planning permission subject to:

- A. Any direction by the London Mayor pursuant to the Mayor of London Order
- B. The prior completion of a S106 legal agreement to secure the following planning obligations:
 - a) Affordable housing provision to include 109 intermediate rent units (20% of total units or 21% by habitable room) with 76 units (11 x 1-bed, 1 person; 43 x

- 1-bed, 2 person; and 22 x 2-bed, 4 person) being at Discount Market Rent (discounted at 80% of market rent) and 33 units (5 x 1-bed, 1 person; 18 x 1-bed, 2 person; and 10 x 2-bed, 4 person) at London Living Rent);
- b) Affordable housing review mechanism and nominations agreement (early and late stage review and PRS claw back requirements in accordance with the Mayor of London Affordable Housing and Viability SPG 2017 as well as a plan to ensure affordable units are marketed/provided to Croydon residents first);
 - c) Air quality contribution of £54,600;
 - d) Local employment and training strategy and Skills Training and Employment (construction and operations) as well as a monetary contribution of £75,000;
 - e) Zero Carbon off-set contribution of £839,216 including connection and participation to a district energy scheme);
 - f) Connection to district energy scheme;
 - g) Public Transport contribution for TfL of £189,149 (index linked) towards improvements and upgrades to the local public transport network;
 - h) Public Realm Cycle Parking contribution of £30,000 (or a lesser sum should this be agreed with the Council) towards the relocation of the existing public cycle parking outside the site;
 - i) Removal of future residents applying for parking permits;
 - j) Travel Plan;
 - k) Car club;
 - l) TV signal mitigation;
 - m) Retention of scheme architects (or suitably qualified alternative architect);
 - n) Wind Mitigation Works;
 - o) Playspace contribution of £50,000 towards provision/capacity enhancements within local parks;
 - p) Off-site Highway works and wind mitigation - a S278 agreement to cover all associated highway works to facilitate the development, and any off site wind mitigation measures; and
 - q) Monitoring fees (in accordance with the LB Croydon S.106 Planning Obligations/CIL Review 2017).

3.2 That the Director of Planning and Strategic Transport has delegated authority to negotiate the detailed term of the legal agreement, securing additional/amended obligations if necessary.

3.3 That the Director of Planning and Strategic Transport has delegated authority to issue the planning permission and impose conditions [and informatives] to secure the following matters:

Conditions

- 1) Time limit of 3 years
- 2) In accordance with approved plans
- 3) Full details of materials, including samples, and design detail (including balconies)
- 4) Typical façade details at 1:1
- 5) Details of hard and soft landscaping, including green and brown roofs, including children's play area
- 6) Tree Planting Strategy
- 7) Tree Protection Plan
- 8) Landscaping and public realm management and maintenance strategy
- 9) Detailed information on the fenestration of the ground floor, including shop fronts, optimisation of transparent glazing, signage zones and coordination and enhancement of the public realm.
- 10) Use of ground floor as Class A3/B1/D2
- 11) Restriction on hours of use of non-residential uses
- 12) Proposal for the treatment of any gates proposed for the basement access
- 13) Gym facility for use by residents only unless with the express consent of the LPA
- 14) BREEAM excellent shall be achieved for the non-residential uses
- 15) 10% of the dwellings shall be designed to be Category 3 'Wheelchair user dwellings'
- 16) 90% of the dwellings shall be designed to be Category 2 'Accessible and adaptable'
- 17) Car park management plan to be submitted
- 18) Provision of cycle parking and disabled resident parking prior to first occupation
- 19) Provision of details of cycle spaces allocated to the non-residential units
- 20) Cycle parking strategy to be submitted
- 21) Provision of electric and passive vehicle charging points
- 22) Submission of details of the car club
- 23) Details of refuse collection arrangements
- 24) Extract systems for café premises (Class A3) to be submitted
- 25) Provision of dropped kerb to basement access prior to occupation
- 26) Detailed Construction Logistics Plan (to include site waste management plan) and Construction Environment Management Plan
- 27) Delivery and Servicing Plan
- 28) Wind mitigation measures compliance
- 29) Submission of and compliance with detailed Travel Plan for residential and non-residential uses.
- 30) Night-time external lighting strategy for both the buildings (to contribute to the skyline) and public realm
- 31) Incorporate design features to make future connection to District Energy Network possible
- 32) Public art strategy and meanwhile strategy to be submitted
- 33) Control of internal noise environment
- 34) Noise from air and plant units should not increase background noise
- 35) In accordance with noise assessment report
- 36) Details of Air handling units/Plant/Machinery and screening to be submitted
- 37) Photovoltaic panel details to be submitted

- 38) Submission of a window ventilation systems and sound insulation
- 39) Noise standard compliance for living rooms and bedrooms
- 40) Submission of land contamination assessment and carrying out of investigation
- 41) Provision of verification that remediation has taken place prior to occupation
- 42) The development shall stop if unexpected contamination found, and appropriate remediation agreed, carried out and verified
- 43) No surface water to infiltrate the ground unless prior approval has been given and it has been demonstrated that there will be no adverse impact on controlled waters.
- 44) Piling method statement to be submitted
- 45) Compliance with Air Quality Assessment and submission of air quality Low emission strategy
- 46) Secured by Design
- 47) Details of CCTV scheme to be submitted
- 48) Plans of access routes, details of signage indicating access for cyclists and cars
- 49) Petrol and oil receptors provided in car park areas
- 50) Submission of biodiversity enhancements
- 51) Incorporate design features to make future connection to District Energy Network possible
- 52) Submission of sustainable urban drainage strategy (detailing any on and/or off site drainage works)
- 53) Submission of impact study of the existing water supply infrastructure
- 54) Water consumption
- 55) Aviation warning lights (including construction)
- 56) Any other planning condition(s) considered necessary by the Director of Planning

Informatives

- 1) Development is CIL liable
- 2) Construction site code of conduct
- 3) Subject to a legal agreement
- 4) Thames Water informative regarding surface water drainage and advising of the presence of a main crossing the site which may need to be diverted at the developer's cost.
- 5) Network Rail informative relating to future maintenance, drainage, plant and materials, scaffolding, piling, fencing, lighting, noise and vibration and vehicle incursion and the need to contact them prior to works commencing.
- 6) Any other planning condition(s) considered necessary by the Director of Planning and Strategic Transport.

3.4 That, if by 30th February 2018 the legal agreement has not been completed, the Director of Planning and Strategic Transport has delegated authority to refuse planning permission.

4 PROPOSAL AND LOCATION DETAILS

Proposal

4.1 The application seeks permission for the following:

- The erection of a part 38 and part 44 storey building comprising 546 'Build to Rent' residential units (97 x studios; 247 x 1-bedroom; 164 x 2-bedroom and 38 x 3-bedroom) of which 109 would be affordable housing units (76 units at 80% of Discounted Market Rent and 33 units at Discounted Market London Living Rent)

(20% of the total) with all units either meeting or exceeding the nationally described space standards and 10% of the units (55 units) being designed to be easily adaptable for wheelchair use;

- A double-storey height ground floor to include 611.1sqm of non-residential use floor space including an art gallery (Class D1) of 191.5sqm, café (Class A3) of 156.2sqm and 263.4sqm of flexible business workspace for creative studios and tech-hub businesses (Class B1) together with residential support space incorporating a lobby, supporting office spaces, mail room and letting office;
- The provision of 28 blue badge disabled parking space (5% of the total number of units) at basement level 1, accessed from College Road to the rear of the site;
- The provision of 786 cycle parking spaces at basement level 2 accessed from College Road to the rear of the site with visitor spaces located at grade in the adjacent public realm;
- Amenity space areas including a public winter garden of 360sqm fronting George Street; a managed podium garden of 250sqm located at mezzanine level above the ground floor access ramp to the basement levels and servicing area facing College Road; and 435sqm of communal resident roof top garden amenity space at Floor 37 and Floor 43 of the 2 towers. A club room with dining spaces and gym areas are also proposed on both these floors. All of the 2 and 3 bedroom units (51% of the total) proposed would have a private glazed balcony space and the remaining 1-bedroom units would all benefit from Juliette balconies; and
- Provision of public realm improvements, including the provision of a new area of public realm to the east of the site fronting Mondial House and the formation of a new pedestrian and cycle link between the East Croydon transport interchange on George Street and College Green.

4.2 The applicant proposes to construct a modular building, meaning that each 'module' will be manufactured off site in a controlled manufacturing environment. The modular build method offers a wide array of unit types (about 40+ variations will be utilised for a variety of residential typologies) above podium level and incorporates a bespoke, contextual and crafted façade design. It would also allow the applicant to construct the building in 22 months, which is somewhat faster than a conventional concrete frame building of this scale (which would have a construction timeframe of at least three years).

Site and Surroundings

4.3 The site is a rectangular area of land approximately 0.22 hectares in area and is located on the southern side of George Street, opposite Ding wall Road and in close proximity to East Croydon Station. It has been vacant and surrounded by site hoardings for some years, having been previously occupied by an office building known as Essex House which was demolished in 1989. Access through the hoarding is on the southern boundary, with a crossover at this location. The land is roughly level within the site.

4.4 The surrounding area contains a mix of commercial, residential and educational uses. St Matthews House directly adjoins the site boundary to the west and comprises a three storey building with residential accommodation (including some principle habitable room windows looking out onto the application site) on the upper two floors. To the east is Mondial House (102 George Street) for which the Council has resolved to grant permission (LBC Ref. 16/00180/FUL) subject to a legal agreement for a large scale residential-led redevelopment comprising 220 flats and

Class A1 and B1 floorspace. To the immediate south is a subterranean parking area, upon which there is a consent for a mixed use development comprising of a hotel and residential flats, in a building of up to 37 storeys. To the west of that site is the main Croydon College building.

4.5 The following designations apply:

- Croydon Opportunity Area
- Croydon Metropolitan Centre
- Within the Fairfield Masterplan area
- Archaeological Priority Zone
- Area of High Density

Planning History

4.6 The following planning decisions are relevant to the application:

Application Site

- 17/03896/ENV – EIA Screening Opinion Issued on 18th August 2017 confirming that an EIA was not required for the erection of a part 38 part 44 storey mixed use building comprising commercial uses on lower floors and 546 residential units on the upper floors.
- 16/00944/P - Hybrid (outline and full) planning permission granted on 27th April 2017 for a wider redevelopment of the College Green site:
 - Outline planning permission for demolition and redevelopment to provide flexible class A1 (shops) and/or class A2 (financial and professional services) and/or class A3 (food and drink); class B1 (business); class C1 (hotel); class C3 (dwelling houses); class D1 (non-residential institutions); class D2 (assembly or leisure); public realm and landscaping; and associated car and cycle parking, servicing, and access arrangements (with all matters reserved)
 - Full planning permission for demolition including multi-storey car park and Barclay Road Annexe; extensions and alterations to Fairfield Halls including class A3 (food and drink); erection of buildings for flexible class A1 (shops) and/or class A2 (financial and professional services) and/or class A3 (food and drink) and/or class D1 (non-residential institutions) and/or class D2 (assembly and leisure) and class C3 (dwelling houses); change of use of basement car park (part) to class D1 (non-residential institutions); public realm and landscaping; and associated car and cycle parking, servicing, and access arrangements
- 14/01594/P – Planning permission granted on 28th September 2015 for the erection of two buildings of 17 and 32 storeys respectively, comprising 305 residential units, 4 commercial units and a gym; provision of public piazza and associated landscaping, parking and cycle and refuse storage. The development has not commenced, but the permission will remain extant until 28th September 2018.

- 11/00963/P – Planning permission granted for the erection of 17 storey building with basement parking area comprising a retail (use class A1) on ground floor and offices (use class B1) in remainder of building. Formation of vehicular access, landscaping, servicing and other associated works. This application was for renewal of an older consent and has expired.

Neighbouring Sites

Mondial House, 102 George Street

- 16/00180/P – Resolution to grant planning permission dated 20th October 2016 for demolition of the existing office building; erection of a part 11, part 13, part 35 storey building comprising plus basement, to provide 220 flats, 1,787 sq. metres B1 office space and 490 sq. metres of A1 retail floor space with associated works.

Land adjoining Croydon College (Croydon College East Site), College Road

- 14/01603/P – Planning permission granted on 4th September 2014 for the erection of a part 16/38 storey building (plus basement and mezzanine levels) comprising 159 residential units, 225 bedroom hotel and restaurant (within use class A3); provision of associated amenity areas, landscaping and car/cycle parking and alterations/partial enclosure of access ramp. The scheme has not been implemented.

5 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- 5.1 There is no objection in principle to the proposal. The proposed development will bring forwards the regeneration of a vacant (derelict) site and is aligned with the desire for growth within the Croydon Opportunity Area. A residential-led mixed use development is appropriate given the significant housing demand within the Borough. There is also an extant planning permission already granted for a similar form (albeit lesser scale) of development.
- 5.2 The proposed building arrangement within the site is considered to be an innovative architectural solution which will result in a distinctive landmark development within this prominent location, which is supported. The height and massing of the two towers of the building has been assessed in relation to its impact from a wide range of viewpoints and has been found to be satisfactory, including in relation to its impact on heritage assets. There is no objection to a tall building in this location, which has a very high public transport accessibility level.
- 5.3 The appearance and detailed façade treatment of the building is considered to be high quality, displaying an appropriate response to the surrounding character.
- 5.4 The outlook, sunlight and daylight levels within rooms within the building beyond the flank windows of the adjoining St. Matthews development would be adversely affected by the development. However, these impacts would not be to such an extent to cause an unacceptable degree of harm to existing occupiers and would be no greater than that that experienced from the development already approved under the extant permission (LBC Ref 14/01594/P).
- 5.5 The development would not hinder the future potential redevelopment of the St. Matthews House site in terms of light and outlook impacts and would not adversely

impact on the future occupiers of the residential units already approved by the Council on the neighbouring Mondial and Croydon College East sites.

- 5.6 The proposed housing density would be above that outlined as normally acceptable in the London Plan. However, it is noted that the density matrix should not be applied with rigidity. Given the context of this site, the higher density is appropriate (and it should be noted the scheme has been referred to the Mayor of London who raised no objection to the density).
- 5.7 The proposed unit mix includes 38 x 3 bed flats (7%) and does not meet the Council's aspiration within this area for 20% of units to have three or more bedrooms. This weighs against the scheme in the balance of considerations relevant to the determination of the scheme. It is recognised however, that the scheme would deliver a good proportion of larger two bedroom units (suitable for families).
- 5.8 The proposal would provide 109 affordable units (which is 20% of units or 21% by habitable room). Of the 109 affordable units, 76 would be provided at Discount Market Rent (discounted to be 80% of open market rents) and 33 of the affordable units would be provided at London Living Rent (set to the discount identified by the Mayor of London). This offer has been subject to extensive viability testing and is considered to be the maximum reasonable level of affordable housing, which still allows the scheme to be financial viable and deliverable. This is less than the Council's policy aim, which is for 50% of units to be affordable. The applicant has agreed to undertake early and late stage affordable housing review being included in the legal agreement (so that increased levels of affordable housing could be secured if the development economics of the scheme improve). Given this and the constraints of the site, the proposed tenure split is considered acceptable.
- 5.9 The proposed development would meet all relevant residential space standards and the provision for private and communal amenity space and play space proposed is considered to be acceptable. Adequate levels of daylight would also be provided within the flats for future residents.
- 5.10 There would be no overlooking between flats within the development site. While residential flats are proposed in the Mondial House scheme to the east of the site, these are across a road and the overlooking issue is no different to that found in the consented scheme (LBC Ref 14/01594/P). To the west are residential dwellings in the St Matthew's development and it is noted that the eastern elevation of the proposed building includes angled windows to prevent any direct overlooking/loss of privacy. Again, the overlooking issue is no different to that in the consented scheme. Given planning history and the urban context in which the site is set, no objection is made.
- 5.11 With suitable conditions (which are recommended) to secure mitigation, the development is considered acceptable with regards to its environmental impacts, specifically in relation to internal noise conditions, air quality impacts, land contamination, flood risk, electronic interference, aviation and wind.
- 5.12 The highways impacts of the development would be acceptable. 28 disabled parking spaces would be provided within the basement to serve wheelchair users who may occupy the development and 786 cycle parking spaces in accordance with the London Plan's cycle standards. The Council's Highways advisor and TfL have raised no objection to the proposals.

5.13 The building would have a sustainable construction, meeting all of the relevant sustainability standards.

6 CONSULTATION RESPONSES

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

6.2 The following organisations were consulted regarding the application:

The Greater London Authority (Statutory Consultee)

6.3 The GLA have made the following comments:

- Principle of development: The principle of the comprehensive redevelopment of this vacant site to provide 546 'Build to Rent' units, tech hub and an art gallery, is supported. The provision of the tech hub and gallery floorspace must be secured.
- Affordable housing: 20% affordable housing is unacceptable. The high-density residential-led redevelopment of a vacant low-value site must provide more affordable housing. The applicant's viability assessment will be rigorously scrutinised. Claw back, early and late stage review mechanisms must be secured in line with the Mayor's Affordable Housing and Viability SPG.
- Urban design: The innovative modular construction method is welcomed and has resulted in a high design standard. Given the scale of development, key details should be secured as part of any permission to ensure an exemplary build quality is delivered. The applicant should review the west facing windows to ensure they optimise sunlight penetration to predominantly north facing units. Further discussion regarding residential amenity is required.
- Heritage: Whilst the proposal would result in a greater presence of development above the roofline of the existing heritage assets, the scale and massing contributes to the narrative of the regeneration of Croydon. Officers conclude that it would cause less than substantial harm to the setting of heritage assets
- Climate change: G-values for overheating and Part L calculations must be clarified and the carbon savings shortfall must be off-set.
- Transport: Further discussion is required cycle parking and construction logistics. Conditions and s106 obligations and a £280,000 contribution to buses and trams are required.

Transport for London (TfL) (Statutory Consultee)

6.4 TfL requests the following points are addressed for the application to comply with the transport policies of the London Plan:

- The application should investigate the demand and options for providing a car club space and membership;
- Cycle parking should be provided in line with the standards for all land uses;
- £280,000 secured towards transport improvements within the vicinity of the site
- Further discussions should be held between TfL and the application / construction team, with a Construction Logistics Plan being secured by condition;
- The Delivery and Servicing Plan being secured by condition; and
- Travel Plan secured through a S106 legal agreement.

Environment Agency (Statutory Consultee)

- 6.5 The Environment Agency have confirmed that they have no comments to make on this application as it falls outside their remit as a statutory planning consultee.

Historic England - Archaeology

- 6.6 The archaeology team at Historic England have confirmed that no further assessment or conditions are necessary with regards to archaeology.

Historic England

- 6.7 Historic England have confirmed they do not wish to offer any comments on this occasion and have requested the application be determined in accordance with national and local policy guidance, and on the basis of the Council's specialist conservation advice.

Natural England

- 6.8 Natural England have raised no objection to the proposal.

The Health and Safety Executive (HSE)

- 6.9 HSE have confirmed they have no comments to make on the application as the proposed development does not lie within the consultation distance of a major hazard site or major accident hazard pipeline.

Network Rail

- 6.10 Network Rail have raised no objection to the proposal. Their generic comments relating to future maintenance, drainage, plant and materials, scaffolding, piling, fencing, lighting, noise and vibration and vehicle incursion and the need to contact them prior to works commencing would be attached as an informative to any planning permission granted.

Thames Water

- 6.11 Thames water have confirmed no objection to the proposal subject to conditions requiring details of any piling, a drainage strategy (detailing any on and/or off site drainage works) and an impact study of the existing water supply infrastructure to be submitted and agreed in consultation with them being attached to any planning permission granted together with informatives relating to surface water drainage and advising of the presence of a main crossing the site which may need to be diverted at the developer's cost.

Metropolitan Police Service – Designing Out Crime Officer

- 6.12 The Officer has confirmed no objection to the proposal subject to a 'Secured by Design' condition being attached to any permission granted.

Aviation safeguarding organisations – Gatwick Airport, Heathrow Airport and NATS Safeguarding

- 6.13 All of these organisations have confirmed that they hold no safeguarding objections to the proposal.

Defence Infrastructure Organisation (DIO)

6.14 The DIO have confirmed that as this application relates to a site outside of Ministry of Defence safeguarding areas, no safeguarding objections are raised to this proposal.

7 LOCAL REPRESENTATION

7.1 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: 01 Objecting: 01 Supporting: 00

No of petitions received: 00

7.2 The single representation received raises the following concerns:

- The quantum of residential provision achieved is at the expense of other important strategic and local policy requirements;
- The proposal will result in a marked increase in proposed height of the towers, from 17 and 32 storeys approved to 38 and 44 storeys proposed. This increase in height and bulk may fail to relate to neighbouring properties, impact upon the setting of heritage assets (including listed buildings and conservation areas) over a wider area and result in an overdevelopment of the site;
- The proposal fails to provide a suitable amount of family housing (i.e. 3+ bedroom units) to ensure an appropriate mix and balance of residential accommodation; and
- The proposal fails to provide a suitable level of affordable housing.

7.3 The above concerns that are material to the determination of the application, are addressed in substance in the 'MATERIAL PLANNING CONSIDERATIONS' section of this report, or by way of planning condition or planning obligation.

8 RELEVANT PLANNING POLICIES AND GUIDANCE

8.1 In determining any planning application, the Council is required to have regard to the provisions of its Development Plan so far as is material to the application and to any other material considerations and the determination shall be made in accordance with the plan unless material considerations indicate otherwise. The Council's adopted Development Plan consists of the Consolidated London Plan 2015, the Croydon Local Plan: Strategic Policies 2013 (CLP1), the Croydon Replacement Unitary Development Plan 2006 Saved Policies 2013 (UDP) and the South London Waste Plan 2012.

8.2 Government Guidance is contained in the National Planning Policy Framework (NPPF), issued in March 2012. 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:

- Promoting sustainable transport;

- Delivering a wide choice of high quality homes; and
- Requiring good design.

8.3 The main policy considerations raised by the application that the Committee are required to consider are:

8.4 London Plan 2017:

- 3.3 Increasing housing supply
- 3.4 Optimising housing potential
- 3.5 Quality and design of housing developments
- 3.6 Children and young people's play and informal recreation facilities
- 3.7 Large residential developments
- 3.8 Housing choice
- 3.9 Mixed and balanced communities
- 3.10 Definition of affordable housing
- 3.12 Negotiating affordable housing
- 3.13 Affordable Housing thresholds
- 4.6 Support for and enhancement of arts, culture, sport and entertainment
- 4.10 New and emerging economic sectors
- 5.2 Minimising carbon dioxide emissions
- 5.3 Sustainable design and construction
- 5.5 Decentralised Energy Networks
- 5.6 Decentralised energy in development proposals
- 5.7 Renewable energy
- 5.9 Overheating and cooling
- 5.10 Urban greening
- 5.11 Green roofs and development site environs
- 5.13 Sustainable drainage
- 5.15 Water use and supplies
- 5.21 Contaminated land
- 6.3 Effects of development on transport capacity
- 6.9 Cycling
- 6.10 Walking
- 6.11 Smoothing traffic flow and tackling congestion
- 6.12 Road Network Capacity
- 6.13 Parking
- 7.1 Lifetime neighbourhoods
- 7.2 An inclusive environment
- 7.3 Designing out crime
- 7.4 Local character
- 7.5 Public realm
- 7.6 Architecture
- 7.7 Tall and large buildings
- 7.8 Heritage assets
- 7.14 Improving Air Quality
- 7.15 Reducing and managing noise
- 7.21 Trees and Woodland
- 8.2 Planning obligations
- 8.3 Community infrastructure levy

8.5 Croydon Local Plan: Strategic Policies 2013 (CLP1):

- SP1.1 Sustainable Development
- SP2.1 Homes
- SP2.2 Quantities and Locations
- SP2.3 Affordable Homes - Tenure
- SP2.4 Affordable Homes - Quantum
- SP2.5 Mix of homes by size
- SP2.6 Quality and Standard
- SP3.1 Employment
- SP3.2 Innovation, Investment & Enterprise
- SP4.1-4.3 Urban Design and Local Character
- SP4.5-4.6 Tall buildings
- SP4.7-4.10 Public Realm
- SP4.13 Character, Conservation and Heritage
- SP6.1 Environment and Climate Change
- SP6.2 Energy and CO2 Reduction
- SP6.3 Sustainable Design and Construction
- SP7.4 Enhance biodiversity
- SP8.3-8.4 Development and Accessibility
- SP8.6 Sustainable Travel Choice
- SP8.7(h) Cycle Parking
- SP8.13 Motor Vehicle Transportation
- SP8.15-16 Parking

8.6 Croydon Replacement Unitary Development Plan 2006 Saved Policies 2013 (UDP):

- UD1 High Quality and Sustainable Design
- UD2 Layout and siting of new development
- UD3 Scale and Design of new buildings
- UD6 Safety and Security and New Development
- UD7 New Development and Access for All
- UD8 Protecting residential amenity
- UD13 Parking Design and Layout
- UD14 Landscaping
- UD15 Refuse and Recycling Storage
- EP1 – EP3 Pollution
- EP5 - EP7 Water – Flooding, Drainage and Conservation
- T2 Traffic Generation from Development
- T4 Cycling
- T8 Parking
- H2 Supply of new housing
- H3 Housing Sites
- H4 Dwelling mix on large sites

8.7 Emerging Policies CLP1.1

- SP2.2- Quantities and locations
- SP2.3-2.6- Affordable Homes
- SP2.8- Quality and standards

- SP3.13- Office floor space in the Croydon Metropolitan Centre
- SP3.14- Employment and training
- SP4.13- Character, conservation and heritage
- SP6.3- Sustainable design and construction
- SP6.4- Flooding, urban blue corridors and water management
- SP8.9- Sustainable travel choice

8.8 Emerging Policies CLP2

- DM1- Housing choice for sustainable communities
- DM5- Development in Croydon Metropolitan Centre
- DM5.1- Vitality and viability
- DM5.3- Mixed use developments
- DM9- Development in edge of centre and out of centre locations
- DM11- Design and character
- DM11.1- Quality and character
- DM11.2- Quality of public and private spaces
- DM11.4- Residential amenity space
- DM11.5- Communal residential amenity space
- DM11.6- Protecting residential amenity
- DM11.7- Design quality
- DM11.9- Landscaping
- DM11.10- Architectural lighting
- DM12- Shopfront design and security
- DM14- Refuse and recycling
- DM16- Tall and large buildings
- DM17.1- Promoting healthy communities
- DM19.1- Character, appearance and setting of heritage assets
- DM19.9- Archaeology
- DM24- Development and construction
- DM25- Land contamination
- DM26.2- Flood resilience
- DM26.3- Sustainable drainage systems
- DM28- Biodiversity
- DM29- Trees
- DM30- Promoting sustainable travel and reducing congestion
- DM31- Car and cycle parking in new development
- DM33- Facilitating rail and tram improvements
- DM36- Croydon Opportunity Area

8.9 The Partial Review of Croydon Local Plan: Strategic Policies (CLP1.1) and the Croydon Local Plan: Detailed Policies and Proposals (CLP2) was approved by Full Council on 5th December 2016 and was submitted to the Planning Inspectorate on behalf of the Secretary of State on 3rd February 2017. The examination in public took place between 16th May and 31st May 2017. Main modifications have been received from the Planning Inspector and the Council consulted on these modifications during the period 29th August – 10th October 2017.

8.10 According to paragraph 216 of the NPPF, relevant policies in emerging plans may be accorded weight following publication, but with the weight to be given to them is

dependent on, among other matters, their stage of preparation. Now that the main modifications to CLP1.1 and CLP2 have been published for consultation, there are certain policies contained within these plans that are not subject to any modifications and significant weight may be afforded to them on the basis that they will be unchanged when CLP1.1 and CLP2 are adopted.

8.11 There is relevant Supplementary Planning Guidance as follows:

- London Housing SPG, March 2016
- Homes for Londoners: Affordable Housing and Viability SPG, August 2017
- National Technical Housing Standards, 2015
- National Planning Practice Guidance, 2014
- Play and Informal Recreation SPG
- Accessible London: Achieving an Inclusive Environment SPG
- Sustainable Design and Construction SPG
- Draft Culture and Night Time Economy SPG
- Croydon Public Realm Design Guide, 2012
- Croydon Opportunity Area Planning Framework (adopted by the Mayor and Croydon), 2013
- Fair Field Masterplan, 2013
- SPG Note 3 – Designing for Community Safety
- SPG Note 10 – Designing for Accessibility
- SPG Note 12 – Landscape Design
- SPG Note 15 – Renewable Energy
- SPG Note 17 – Sustainable Surface Water Drainage
- SPG Note 18 – Sustainable Water Usage

9 MATERIAL PLANNING CONSIDERATIONS

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

1. Principle of development
2. Density, housing unit mix and affordable housing
3. Heritage, townscape and visual impact
4. Impact on adjoining occupiers
5. Quality of living environment provided for future occupiers
6. Environmental impacts
7. Transportation, access and parking
8. Sustainability
9. Other planning Matters

Principle of Development

9.2 At the heart of the National Planning Framework 2012 (NPPF) is a presumption in favour of sustainable development which meets social, economic and environmental needs.

9.3 Policy 2.13 of the London Plan 2017 identifies the centre of Croydon and its immediate surroundings as an Opportunity Area; an area which is capable of accommodating large scale development including significant amounts of employment and new housing. This is reiterated in Policies 4.1 and 4.5 which state

that Boroughs should promote and encourage the provision of a strong and diverse economy.

- 9.4 Croydon Local Plan Strategic Policies (CLP1) Policy SP1.3 states that the Council will seek to encourage growth and sustainable development, whilst Policy SP1.2 states that the Croydon Opportunity Area will be the primary location for growth.
- 9.5 The Croydon Opportunity Area Planning Framework (OAPF), which was adopted in 2013, sets out key strategic objectives for central Croydon. This is focussed around the renewal and regeneration of the retail core, the delivery of new homes and jobs in high quality new development, with commensurate social infrastructure, public transport and public realm/high street enhancements.
- 9.6 The NPPF also attaches great importance to significantly boosting the supply of new housing. Policy 3.3 of the London Plan further seeks to increase housing supply across the Capital, with minimum housing targets being set out in Table 3.1. For Croydon, the London Plan and OAPF set out an indicative employment capacity of 7,500 and at least 7,300 new homes. The London Plan sets a minimum target of 1,435 residential units per year in the borough over the period of 2015-2025.
- 9.7 The site is located within the Croydon Opportunity Area and Croydon Metropolitan Town Centre, where residential development is supported. The site is vacant (having previously been occupied by an office) and has an extant permission for a large scale residential development of 305 units. The use of the site for residential purposes has previously been accepted and the proposal would be in line with the objectives for the Fairfield area outlined in both the Fairfield Masterplan and the OAPF where no objection is raised in principle to the development. The proposal would deliver 546 residential units which would contribute to 38% of Croydon's annual target and approximately 7% of the indicative minimum housing target contained in the OAPF.
- 9.8 Policy 3.8 of the London Plan and the guidance within the Mayor's Housing SPG and Affordable Housing and Viability SPG identify 'Build to Rent' housing as addressing a distinct need and a method by which housing delivery might be accelerated. Given the site's location in the town centre within a very sustainable location (less than 100 metres from East Croydon Station with a 6b PTAL rating and within easy access to local services and amenities) it is suited to higher density, rented accommodation. The principle of 'Build to Rent' housing on this site is therefore supported.
- 9.9 The provision of an art gallery space in the development is also strongly supported in accordance with London Plan Policy 4.6 and the Mayor's draft Culture and Night Time Economy SPG. In addition, this space will provide a link to the cultural square identified for the adjacent Fair Field Masterplan area.
- 9.10 The development proposes the re-use of an existing underutilised site, in a highly sustainable location, with a building which meets the standards set out in Development Plan policy and guidance. This approach accords with the core principles of the NPPF, which encourages the reuse of previously developed land. In light of the priority given to the delivery of a significant number of new dwellings (particularly on underused brownfield sites), the principle of the redevelopment of the site with a residential-led mixed use development is supported and would fully comply with Council policy.

Density, Housing Unit Mix and Affordable Housing

Density

- 9.11 Policy 3.4 of the London Plan states that in taking into account local context and character, the design principles in Chapter 7 and public transport capacity, development should optimise housing output within the relevant density range shown in Table 3.2. Based on the public transport accessibility level (PTAL 6b) and the site's central characteristics, the London Plan density matrix suggests a residential density of between 650-1100 habitable rooms per hectare and 140-405 units per hectare for the application site.
- 9.12 The residential density of the proposal would be 6,175 habitable rooms per ha or 2,730 units per hectare which would far exceed the upper limit of the indicative range within the London Plan for a central area. Even so, the site is within the centre of the Opportunity Area, where significant growth is expected to be accommodated and the supporting text of Policy 3.4 of the London Plan confirms that the density matrix should not be applied mechanistically.
- 9.13 The Mayor's Housing SPG, at paragraph 1.3.12, further states that the density ranges should be "*used as a guide and not an absolute rule, so as to also take proper account of other objectives*". It does not preclude developments with a density above the suggested ranges, but requires that they "*must be tested rigorously*" (para.1.3.14). This will include an examination of factors relating to different aspect of "*liveability*" of a proposal (dwelling mix, design and quality of accommodation), access to services, impact on neighbours, management of communal areas and a scheme's contribution to '*place shaping*'. The impact of massing, scale and character in relation to nearby uses will be particularly important – and "*design should be exemplary*".
- 9.14 The SPG also considers the opportunities and constraints with regards to density on small sites (para.1.3.39). Responding to existing streetscape, massing and design of the surrounding built environment should be given special attention – where existing density is high, for example, higher density can be justified. Paragraph 1.3.40 notes that small sites require little land for internal infrastructure and as such, it is appropriate for density to reflect this. These factors are all relevant to the development of the application site. The SPG also notes that build to rent schemes can be particularly suited to higher density development within or on the edge of town centres or transport nodes (the site is literally across the road from East Croydon Station).
- 9.15 Taking account of the above, the proposed residential development as set out below has been designed to deliver new homes within a building that responds to its local context, taking into account both the physical constraints of the site and its relationship with neighbouring properties and the nearby townscape.
- 9.16 The proposed development exceeds the London density range. However, this is justified by the quality of the accommodation, the design and its response to context, and the rigour the applicant has applied to assessing the acceptability of the scheme within these parameters. It delivers on London Plan policy by optimising additional housing on an underutilised brownfield site in a highly accessible location.

9.17 Given the site's excellent PTAL rating, its location close to East Croydon Station as well as bus and tram links and nearby local amenities, it is considered that the density proposed is acceptable.

Housing Unit Mix

9.18 CLP1 Policy SP2.5 seeks to secure the provision of family housing and states the Council's aspiration for 20% of all new homes within the Croydon Opportunity Area having three or more bedrooms and 35% of all two bedroom homes having four bed-spaces.

9.19 The OAPF indicates that developments within the Fair Field Zone should aim to provide 20% of units with 3 bedrooms or more. The Masterplan also identifies the site as suitable for a mix of new homes, including family homes.

9.20 The unit mix of the development is reproduced below for ease of reference:

	Studio	1 bed	2 bed	3 bed	Total
Market Rent	97 (18%)	170 (31%)	132 (24%)	38 (7%)	437 (80%)
Discount Market Rent (Intermediate)	0 (0%)	54 (10%)	22 (4%)	0 (0%)	76 (14%)
Discount Market Rent (London Living Rent)	0 (0%)	23 (4%)	10 (2%)	0 (0%)	33 (6%)
Total	97 (18%)	247 (45%)	164 (30%)	38 (7%)	546

9.21 The proposal allows for 7% three bedroom units and 30% two bedroom units. The applicant has stated that current market demand is unlikely to enable them to provide more than the proposed level of three bedroom units and the proposed development is viability driven to a certain extent. On the basis that all of 2 bedroom units proposed would be suitable for 4 persons (thus significantly exceeding the 35% CLP1 target) and that the 20% three-bedroom OAPF requirement for this area can be made up of a mix of 2 bedroom 4 person and three plus bedroom properties for the first three years of the plan, the proposed proportion of family housing is considered acceptable.

9.22 The proposal would provide an appropriate mix of London Plan compliant units (97 x studios; 247 x 1-bedroom; 164 x 2-bedroom and 38 x 3-bedroom) to meet a variety of demands across the Borough in accordance with Policy 3.8 of the London Plan.

Affordable Housing

9.23 Policies 3.8 to 3.13 of the London Plan relate to affordable housing. Policy 3.11 states that the Mayor will, and boroughs and other relevant agencies and partners should, seek to maximise affordable housing provision and ensure an average of at least 17,000 more affordable homes per year in London over the plan period. In order to give impetus to a strong and diverse intermediate housing sector, 60% of the affordable housing provision should be for social and affordable rent and 40% for

intermediate rent or sale. Priority should be accorded to provision of affordable family housing. Paragraph 173 of the NPPF imposes an obligation on Councils to ensure viability when setting requirements for affordable housing.

- 9.24 Policy 3.12 of the London Plan further seeks the maximum reasonable amount of affordable housing when negotiating on individual housing schemes but states that the objective is to encourage rather than restrain residential development. To encourage the development of 'Build to Rent' housing, the London Plan recognises the distinct economics of the sector relative to the mainstream 'Build for Sale' market housing, which should be taken into account when considering planning applications for 'Build to Rent' schemes. Whilst the Mayor's Affordable Housing and Viability SPG does not currently establish a threshold approach to affordable housing for 'Build to Rent' schemes, the Mayor is clear that he expects significant increases in the delivery of affordable housing through planning and has set a long-term strategic aim for 50% affordable housing.
- 9.25 Policy SP2.4 of CLP1 seeks up to 50% affordable housing provision on sites such as this. Table 4.1 provides flexibility, requiring a minimum level of affordable housing on all sites. Following the end of the first three years of the plan, the minimum level was reviewed (from its previous minimum requirement of 15%) and this is currently set at 50%. In the Croydon Opportunity Area, a minimum of 10% affordable housing will need to be provided on-site with the remainder being provided either on-site, off-site (e.g. on a donor site) or through a commuted sum. The affordable housing should be provided at a ratio of 60:40 between affordable rented homes and intermediate housing. This policy is being reviewed through the partial review of CLP1 (CLP1.1). The Local Plan Inspector has introduced main modifications to the policy, which do not alter the policy approach but does mean that only moderate weight can be afforded to the emerging policy landscape.
- 9.26 Emerging policy SP2.4 of CLP1.1 prefers a minimum on site provision of 30% affordable housing, but also provides options for 15% onsite/15% on a donor site (located in the COA, Addiscombe, Broad Green, Selhurst, South Croydon or Waddon), or a minimum of 15% onsite plus a review mechanism for the remaining affordable housing (provided that 30% affordable housing is not viable, construction costs are not in the upper quartile and there is no suitable donor site).
- 9.27 Emerging policy retains the 60:40 ratio but expands the types of intermediate products to include starter homes and intermediate rent products as well as low costs shared ownership homes. The main modifications to the emerging policy include providing for PRS schemes (such as is proposed in this application). Consequently, the principle of a PRS approach would be acceptable in principle form a policy perspective.
- 9.28 The viability report has been independently assessed by the Council's viability consultant who have confirmed the validity of the applicant's financial viability assessment. In this case the provision of the CLP1 target of 50% affordable housing is not achievable. The developer is proposing to achieve affordable housing on site through delivering 20% by unit numbers (or 21% by habitable rooms) within the lower 38-storey tower. This includes 109 intermediate rent units (20% of total units or 21% by habitable room) of which 76 units would be at Discount Market Rent (discounted at 80% of market rent levels) and 33 units would be at London Living Rent (as set by the Mayor of London).

- 9.29 The Council considers that 20% on-site affordable housing should be the minimum amount to be provided on site and early and late review mechanisms are required. In addition robust covenants and clawbacks, in accordance with the Mayor's Affordable Housing and Viability SPG are to be secured in the legal agreement. The proportion of Discount Market Rent (DMR) and London Living Rent (LLR) units, the mix of unit sizes, the level of discount, the detail of the terms and protections for tenants and the eligibility criteria would be secured by way of a S106 legal agreement.
- 9.30 The Mayor's Affordable Housing SPG and the Government's Housing White Paper recognise DMR and LLR housing provision as being capable of meeting the need for intermediate level affordable homes. This is reflected in CLP1.1 which widens the definition of intermediate affordable housing to include these products.
- 9.31 As the amount of affordable housing proposed is less than the minimum amount of 50% affordable housing required by planning policy, it is proposed that review mechanisms will be sought through the S106 Agreement. As the residential component of the scheme is likely to be delivered over a number of years, review mechanisms will be required at appropriate milestones. The detail of this will be finalised as part of the S106 Agreement, details of which are still being negotiated. The maximum cap for the affordable housing review mechanism would be 50% to ensure policy compliance. On balance, the affordable housing offer is considered to be appropriate, subject to the review mechanisms, covenants and clawbacks as described above.
- 9.32 Under the 2015 extant permission (LBC Ref 14/01594/P) the applicant's offered a provision of 10% of all habitable rooms as affordable, in a shared ownership (intermediate) tenure, with a "cash-in-lieu" commuted sum totalling £1.33million, which would equate to financial outlay towards affordable housing, equivalent to providing 15% of all habitable rooms within the development as affordable intermediate tenure. The current offer is 20% on site (21% on a habitable room basis), increasing the affordable housing offer. This reflects the change in Croydon's planning policy framework as well as the increased quantum of development proposed.
- 9.33 Having regard to comments from the GLA, representations, the independent assessment of viability, the planning history, the extant consent and other material considerations, it is considered that the proposal (with regards to affordable housing) satisfactorily accords with the objectives of the London Plan, emerging London Plan Housing SPG, CLP1, Croydon OAPF, UDP Saved Policies 2013 and national policies.

Heritage, Townscape and Visual Impact

- 9.34 The NPPF attaches great importance to the design of the built environment. Paragraph 17 gives 17 core planning principles. One of these principles is '*always seeks to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings*'. Paragraph 56 states that '*The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people*'.

- 9.35 Paragraph 58 identifies 6 points that decisions should aim to ensure in all development. These include, adding to the overall quality of the area, establishing a strong sense of place, responding to local character and being visually attractive. Paragraph 59 states that local planning authorities should consider using design codes where they could help deliver high quality outcomes. Paragraph 61 highlights the importance of the visual appearance and architecture but also addresses the importance of connections between people and places and the natural, built and historic environment.
- 9.36 Paragraph 63 places weight on outstanding or innovative design. Paragraph 69 seeks to promote safe and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas.
- 9.37 The NPPF also refers to heritage assets in paragraph 133 which states that where a development will lead to substantial harm to a heritage asset it should be refused unless it can be demonstrated that the substantial harm is necessary to achieve substantial public benefits which outweigh that harm or loss. Paragraph 134 states that a less than substantial harm to the significance of heritage assets should be weighed against the public benefits of the proposal.
- 9.38 Policies 7.4 and 7.6 of the London Plan state that new development should be complementary to the established local character and that architecture should make a positive contribution and have a design which is appropriate to its context. CLP1 Policy SP4.1 states that developments should be of a high quality which respects and enhances local character. Policies UD2 and UD3 of the Croydon Replacement Unitary Development Plan (The Croydon Plan) 2006 Saved Policies require development to be of a high quality and visually appropriate design which respects the existing development pattern.
- 9.39 The Fair Field Masterplan (which is a material planning consideration, but does not have the same weight as Development Plan policy) shows a block height of 30m for a building in this site. The proposal is considerably higher than this and as such, the impact of the proposal with regards to bulk, height and massing and facade design has been rigorously tested.

Bulk, Height and Massing

- 9.40 The shape of the building and its arrangement on site is underwritten by a very strong architectural concept which provides a massing response that is unique to the characteristics of the site. The site, which is regular and roughly square, is equally large in both dimensions. These dimensions make the planning of residential development complex in terms of creating acceptable residential floorplate depths, separation distances, the need to maintain privacy and the desire to minimise single aspect north facing units. Most standard massing approaches would therefore not use the available land efficiently.
- 9.41 The scheme's architectural team have developed a massing concept that creates two towers that are related but subtly different, through proportion, material and pattern. This gives each part its own identity and avoids the mass merging into one, particularly when viewed from distance. This is particularly clear in the elevation to George Street where the narrower frontage of the lower 38-storey tower (Tower B) enables it to maintain a proportion and elegance in front of the taller 44-storey tower

(Tower A). This is considered to be an innovative approach to the massing which results in a development that is highly distinctive and would have a landmark quality. This is fully supported and appropriate for this highly prominent site, opposite East Croydon Station, which is one of the key gateways into the Borough.

- 9.42 The two towers are related with the lower 38 storey (Tower B) being expressed in single storeys bays, whilst the taller 44 storey (Tower A) features 'giant order' double storey bays. Tower A would have a parapet height of 193.9m (AOD) which is 0.5m taller than the approved Croydon College Site (193.4m AOD) building and 15m taller than the approved Mondial House (178.8m AOD) building. The two towers would sit within a medium to tall cluster at a gateway location into the cultural quarter and the height and mass of the blocks are considered appropriate for this setting.
- 9.43 Given the dynamic form of the proposed buildings, from many viewpoints the slenderness of the building's towers would be fully expressed, although the north south axis would remain relatively large. The relative slenderness of the building has been assessed from a series of viewpoints examined within the Accurate Visual Representation (AVR) verified views submitted with the application. The massing is acceptable from all views and the building would appear sufficiently slender. The height of the building also appears appropriate within these views. During the pre-application stage, studies including viewpoints within Dingwall Road were produced to determine the overall height of the towers in the context of the emerging Fair Field cluster of tall buildings (i.e. the College East and Mondial proposals). This concluded that a 38-storey and 44-storey tower combination was appropriate in the location.
- 9.44 Although there are no designated heritage assets in the immediate vicinity of the site, as tall buildings, the proposals have potential to impact upon the setting of heritage assets (including listed buildings and conservation areas) over a wider area. The heritage implications of the proposed bulk and height have therefore also been assessed with reference to the views contained within the AVR. The existing view from the Queens Gardens is framed by the characterful backdrop of Segas House (Grade II Listed Building) and the NLA Tower, Croydon College and the Fairfield Halls (all Locally Listed Buildings). The proposed towers would have some impact on the setting of the Queens Gardens within the Central Croydon Conservation Area, but this is mitigated through the high quality design and it reads as a backdrop building rather than dominating the view. It is noted that the special interest of Queens Gardens would not be eroded as a result of this proposal.
- 9.45 When viewed from the Chatsworth Road Conservation Area, the building has a more demonstrable impact on the suburban feel of the conservation area (CA). However it is acknowledged in the Conservation Area Appraisal and Management Plan that the CA is located in close proximity to the town centre with existing and proposed tall buildings visible in the longer views and this forms the setting of the CA. The proposed form of the building appears slender in this location and the design is of a high quality to mitigate the impact.
- 9.46 The scheme will be visible in views of the Grade I Listed Croydon Minster. However only a slither of the towers will be visible near to the north aisle of the church, and whilst it will affect the skyline and setting of the church, this will be a momentary glimpse of the building and will be a less than substantial harm which is outweighed by the public benefits provided by the scheme, in particular the regeneration of a derelict site, provision of improved public realm and the provision of a large quantum of housing in a very sustainable location.

Appearance

- 9.47 The overall façade design creates a distinctive high quality development which reflects the pre-application consultation discussions to date. Given the prominent location of the site and the proposed tall building, it is essential that excellent design quality is delivered. The principle of the architectural expression has been formulated following a thorough character analysis of the local context which is supported.
- 9.48 The purpose of the Fair Field Masterplan is to rediscover the area's role as the cultural destination in Croydon and South London. Key buildings and institutions which contribute positively to the character and identity of the Masterplan area are Croydon College and Fairfield Halls. These public buildings both feature light coloured stone or precast concrete framed elevations which form the most public facing parts of the buildings. The College is predominately a brick building, with the ground floor and façade onto Park Lane clad in stone. Likewise, the principle elevation of Fairfield Halls is expressed with a four bay precast frame at five storeys tall, clearly articulating the public areas and circulation spaces of the building
- 9.49 The site sits as a prominent landmark and acts as a gateway to the Masterplan area from East Croydon Station and George Street. As one of the principle routes into the Metropolitan Centre, George Street carries high levels of footfall to and from East Croydon Station. George Street forms the southern boundary of the New Town area, and as such the architectural style of the street varies from the fine grain two-four storey brick and stone buildings with strong vertical articulation and variation in the roof line and the broad shouldered modernist buildings of the 1950's-80s.
- 9.50 The unique, crafted façade design has been developed through research and analysis of the local characteristics and Croydon's mid-century buildings with faceted geometry. The result is a bespoke, crafted fabric with both towers having a unique but complimentary aesthetic. As shown by the model views and visualisation from the station submitted with the application, the differences between the two tower elements, the crown of the building and the continuous base are all used to generate two forms that are distinct whilst being related to one another. Terracotta has been selected as the primary façade cladding.
- 9.51 At ground floor level, the winter garden fronting George Street continues the colonnade that wraps the rest of the building. It uses a glass roof with a tessellated form that echoes the triangulation of the facade elements in its design and scale.
- 9.52 The colonnade around the winter garden is clad in a perforated anodised metal panel that allows lighting to be integrated and can accommodate the structure supporting the roof. The colonnade scale and form matches the form of the base of the rest of Tower B. The folded forms are subdivided by a series of ribs that radiate, introducing a set of details that reduce the scale while emphasising the way the building catches the light.
- 9.53 The internal space of the winter garden would feature low level planting and some trees that offer a degree of screening to George Street. The paving and organisation of the winter garden is designed to encourage connections into the space while the planting is designed to ensure good site lines which avoid the potential for antisocial behaviour. The bays that sit at the base of the tower are clad in small glazed terracotta tiles which are 3 dimensional and are a miniaturised version of the cladding panels in the main tower. The glass roof is a flattened pyramid. It will be visible from

the upper floor flats so the design is intended to form an attractive and well composed 'third elevation'. The roof omits some panels in the north-east corner over areas of planting. This will maximise light and water through to the winter garden in this area while allowing some pressure release to control the quality of the microclimate. The roof is proposed to be a series of overlapping scales that allow some passage of air to permeate through the roof to avoid the space becoming too hot.

- 9.54 The winter garden colonnade stretches to a height of 7.5m with the apex of the pyramid exceeding 9m internally. Each colonnade bay broadly forms a square with a typical bay spanning 7.5m. The cantilevered corner spans in excess of 7.5m in each direction and will form a dramatic entrance to the winter garden. It is an integral part of the building that establishes a strong rhythm of frontage bays to George Street.
- 9.55 Each bay within the façade is composed of two elements - a metal framing element and a terracotta facade panel. The two elements will be modulated differently to respond to daylight, sunlight and views. This has the advantage of creating a facade which varies with orientation and has a subtly different character from each view. On Tower A, the double height bays feature a more vertical emphasis with folded and ridged form of the terracotta tiles to be used creating a series of vertical shadow lines up the facade. The ridged form creates an interesting effect in the terracotta with pools of the glaze forming over the low points and exaggerating the variation in colour and reflectance that naturally occurs over a panel. The balconies at intermediate floors would be glass to reinforce the rhythm of double height bays.
- 9.56 The facade panels to Tower B would use a folded triangulated panel chamfered into 4 different directions that echoes the mid-century modern examples from around Croydon and beyond. This will be done using a glazed terracotta that when combined with the angled plan form and faceted panel design will ensure a rich play of light and reflections from every angle. The use of exceptional quality, moulded terracotta tiles is supported and these are intended to be of a crafted bespoke quality.
- 9.57 At the crown of the building the geometry of the building's plan changes from angled to orthogonal and this is combined with the omission of the framing elements. The effect is to create a distinctive finale to the building, which gives a strong termination and distinct identity on the skyline (signalling its upward extent).
- 9.58 The design approach taken provides a strong framework in which the residential units sit, and creates a civic appearance that is appropriate to the character of the Fair Field Area. The proposed palette of materials are considered to provide a complementary transition from the red and yellow bricks of the buildings found along George Street and towards Croydon College. Details of the façade/design detailing and materials (including balcony details, glazing, moulded terracotta details, public realm materials, etc.) to be used would be secured by condition.
- 9.59 The proposal would therefore sit comfortably with neighbouring buildings and within the streetscene and would be in accordance with the design, conservation and heritage policies set out above.

Public Realm

- 9.60 The public realm design focusses around part of the Station Link set out in the Fair Field Masterplan to the east of the site. The design that is being proposed

pedestrianizes the area between George Street and College Road and creates a characterful space which starts the sequence of a new level route towards College Green. The scheme is based on a simple banded pattern in the paving which responds to the scale and spacing of the colonnade to the building. The intention is to provide a meandering route through for pedestrians and cyclists.

- 9.61 In order to address potential concerns regarding the visual and physical permeability of this space, given the number of trees that are required as part of the wind mitigation strategy, the large number of wide seating elements and the need to coordinate the development with the approved Mondial and Croydon College site proposals it is recommended that the more detailed feature elements of the landscaping proposal are agreed by condition with those areas outside the applicant's red line boundary being delivered by the applicant through a S106 legal agreement.

Impact on adjoining occupiers

- 9.62 One of the core planning principles (paragraph 17) in the NPPF is that decisions should "*always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings*". London Plan Policy 7.1 states that in their neighbourhoods, people should have a good quality environment.
- 9.63 Croydon Local Plan: Strategic Policies SP4.1 and SP4.2 seek to respect and enhance character to create sustainable communities and enhance social cohesion and well-being. Croydon Plan Policy UD8 states that the residential amenity of adjoining occupiers should be protected. The compliance of the proposal with these policies is now considered below in relation to each impact.

Sunlight and daylight – policy context

- 9.64 The OAPF (paragraphs 6.21-6.25) states that it is important to ensure that any adverse effects from loss of sunlight and daylight to residential occupiers is minimised. The document goes on to state 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*".
- 9.65 Emerging Policy DM11.6 also requires new development proposals to protect or improve the amenity of the occupiers of adjoining residential and commercial buildings, to ensure that "*the amenity of the occupiers of adjoining buildings are protected*" (part a) and that "*they do not result in direct overlooking at close range or habitable rooms*" (part b). Criteria d and e confirm the developments should d) "*Provide adequate sunlight and daylight to potential future occupants*"; and e) "*They do not result in significant loss of existing sunlight or daylight levels of adjoining occupiers.*"
- 9.66 Immediately to the west of the application site is St Matthews House, a low rise building containing some residential accommodation. The building has windows in its eastern flank wall facing the proposed development. The office permission granted in

2011 on the application site proposed a building of 17 storeys sited 7.5m from the boundary. The 2015 extant permission reconfigured the proposed building improving on the relationship with St. Matthews House by setting the proposed building 8 to 9.5m away. The current proposal is similarly separated from St. Matthews House.

9.67 The current application is accompanied by an independent Daylight/Sunlight report produced by Malcolm Hollis Chartered Surveyors which provides an assessment of the potential impact of the development on sunlight, daylight and overshadowing to neighbouring residential properties based on the approach set out in the Building Research Establishment's (BRE) 'Site Layout Planning for Daylight and Sunlight: A Good Practice Guide'. This includes an assessment of impacts on the site's residential neighbours and also considers the effect of the proposed development on two nearby approved schemes, namely Mondial House and the Croydon College sites.

9.68 Daylight has been assessed in terms of Vertical Sky Component (VSC) and sunlight has been assessed in terms of Annual Probable Sunlight Hours (APSH) and overshadowing has been assessed against the above BRE guidelines. The BRE Guidelines provide numerical guidelines, but these are not mandatory, should not be seen as an instrument of planning policy and as numerical guidelines, are to be interpreted flexibly.

9.69 Daylight: the BRE Guidelines stipulate that there should be no real noticeable loss of daylight provided that either:

The Vertical Sky Component (VSC) as measured at the centre point of a window is greater than 27%; or the VSC is not reduced by greater than 20% of its original value. (Skylight); or

The daylight distribution, as measured by the No Sky Line (NSL) test where the percentage of floor area receiving light is measured, is not reduced by greater than 20% of its original value.

9.70 Sunlight: the BRE Guidelines confirm that windows that do not enjoy an orientation within 90 degrees of due south do not warrant assessment for sunlight losses. For those windows that do warrant assessment it is considered that there would be no real noticeable loss of sunlight where:

In 1 year the centre point of the assessed window receives more than 1 quarter (25%) of annual probable sunlight hours (APSH), including at least 5% of Annual Winter Probable Sunlight Hours (WSPH) between 21 Sept and 21 March – being winter; and less than 0.8 of its former hours during either period; and In cases where these requirements are breached there will still be no real noticeable loss of sunlight where the reduction in sunlight received over the whole year is no greater than 4% of annual probable sunlight hours.

Sunlight and daylight – assessment

9.71 The Applicant's assessment considers the impact on the existing residential units at 71-79 George Street to the north west of the site on the opposite side of the street and St Matthews House directly to east. The assessment concludes that with the proposed development in place the majority of the windows to the existing buildings

surrounding the site will continue to receive adequate daylight as defined by the BRE guidance.

71-79 George Street

- 9.72 Of the 42 windows tested at 71-79 George Street as part of the daylight (VSC) analysis undertaken, 32 windows would fully comply with the BRE guidelines. The 10 affected windows are all bay windows where the other sections of the bay continue to receive adequate light and the rooms as a whole will remain adequately lit.
- 9.73 Of the 40 windows tested as part of the sunlight (APSH) analysis undertaken, 34 windows would fully comply with the BRE guidelines. As with daylight above, the 6 affected windows are sections within bays where the other main sections receive BRE compliant daylight results. Therefore, the rooms as a whole will continue to meet the BRE guidelines.

St Matthews House

- 9.74 Of the 45 windows tested at St Mathews House as part of the daylight (VSC) analysis undertaken, 24 windows would fully comply with the BRE guidelines. Whilst the windows within the eastern elevation to St Matthews House would be affected, it is noted that the corner rooms have windows on the main front and rear elevations which are unaffected by the development. Therefore these rooms will continue to remain adequately lit.
- 9.75 Of the 20 windows tested as part of the sunlight (APSH) analysis undertaken, all 20 windows would fully comply with the BRE guidelines.
- 9.76 No gardens or amenity spaces, as defined in the BRE guide, are located close enough to the proposed development to be adversely affected by overshadowing.
- 9.77 When compared with the 2015 extant permission scheme, the proposal would have no greater impact in terms of sunlight and daylight and it is quite possible that the redevelopment of St Mathews House may come forward in the near future and therefore the new development can account for the other nearby proposals in terms of daylight design. The effects of the proposal would therefore be largely mitigated.

Mondial House and Croydon College Sites

- 9.78 The Applicant's sunlight/daylight consultant has also undertaken an additional daylight and sunlight assessments of a future scenario if Mondial House and the Croydon College site are both developed. These two proposed buildings are tall residential towers of circa 179m and 184m above ordnance datum and so are a similar height to the application proposal.
- 9.79 All of the windows within the Croydon College site will be fully BRE compliant with respect to sunlight and daylight. However, a number of windows proposed within Mondial House (6% of the total) will receive lower levels. The higher floors will receive better daylight distribution than the lower floors, due to the reduction in obstructions from the nearby consented developments. Whilst there will be some impact on these upper level windows, the impact would not be significantly greater than that of the 2015 extant scheme and taking into account this central urban location, the effects would not be such as to warrant a reason for refusal of planning permission.

Outlook and privacy

- 9.80 The western-most proposed building would be set back from the western boundary of the site adjoining St. Matthews House by 7.44m. This is comparable to the 2015 extant permission which indicated an 8 metre setback. Whilst the separation would be narrower than would normally be expected in other parts of the Borough, given that St. Matthews House lies within an otherwise very high density commercial area and has windows immediately next to a boundary looking over another site, this protection cannot be reasonably afforded. The 2015 permission and earlier permissions before it, accepted the principle of several windows facing towards the existing St. Matthews House in relative close proximity. The current proposal includes angled windows in the western elevation. These oriel windows direct views to the southwest and northwest (and prevent overlooking of habitable room windows in the St. Matthews development). Within this context the impact of the proposal on outlook and privacy from St. Matthews House is therefore acceptable. There are no other immediately adjoining residencies which would suffer loss of outlook or privacy.
- 9.81 With respect to the developments approved at the Mondial House and Croydon College sites to the east and south, the proposed building would be located 19.1m to 20.6m from Mondial House and 18.4m from the Croydon College sites thereby ensuring no undue loss of outlook or privacy to the future occupiers of these developments.

Quality of Living Environment Provided for Future Residents

Residential Space Standards

- 9.82 Policy 3.5 of the London Plan states that new residential units should provide the highest quality internal environments for their future residents and should have minimum floor areas in accordance with the Government's technical housing standards set out in Table 3.3 and recognises that a genuine choice of homes should be provided in terms of both tenure and size. Detailed residential standards are also contained within the Mayor's London Housing SPG.
- 9.83 Policy 3.8 of the London Plan further states that 10% of new residencies within a development should be wheelchair accessible or easily adaptable for residents who are wheelchair users. Provision should also be made for affordable family housing, wheelchair accessible housing and ensure all new housing meets parts M4 (2) and (3) of the Building Regulations. Policy UD8 of the Croydon Plan further states that external amenity space should be provided to serve new residential units at a level which is commensurate with that provided in the surrounding area.
- 9.84 The London Housing SPG provides further details in relation to housing standards, including in relation to the provision of dual aspect units and private amenity space. Housing SPG standard 4.10.1 states that 5m² of private amenity space should be provided for each one bedroom unit, with a further 1m² provided for each additional occupant. Standard 4.10.3 states that the minimum length and depth of areas of private amenity space should be 1.5m and standard states that developments should avoid single aspect units which are north facing, have three or more bedrooms, or are exposed to a particularly poor external noise environment.
- 9.85 Within the proposed development, the units would have GIA's of between 38.4sq.m for the smallest 1-bedroom 1 person unit and 100.3sq.m for the largest 3-bedroom 5

person unit. All of the proposed units would meet the National Technical Housing Standards in terms of overall size and bedroom size. All of the units would also meet the requirements outlined in the Housing SPG in relation to amenity space quantum and minimum dimensions. The number of dwellings accessed from a single core does not exceed seven and all units would achieve a minimum 2.5 metre floor to ceiling heights.

- 9.86 The submitted wind study also indicates that all of the balconies would achieve wind conditions that are suitable for their intended external amenity use. All of the proposed three bedroom units would have dual aspect and therefore, there are no single aspect units which are north facing, have three or more bedrooms, or are exposed to a particularly poor external noise environment. 55 of the units (10% of the total) would be wheelchair adapted or capable of easy adaptation for wheelchair users. The Policy and Housing SPG requirements outlined above are therefore met.

Private/Communal Amenity Space and Child Play Space Provision

- 9.87 Policy DM11 of Croydon's Local Plan: Detailed Policies and Proposals (Main Modifications) confirms support for new development which includes private amenity space that is of high quality design that enhances and respects the local character of the surrounding area.
- 9.88 The design of the scheme has developed a number of amenity space strategies which are considered appropriate for the height of the building, its proposed management and tenure, and the location in central Croydon. Due to the height of the building, private amenity spaces in the form of conventional exposed balconies were considered to have a challenging micro climate and therefore alternative spaces have been provided. Instead of external balconies, all the 2 and 3 bedroom flats (51% of the total) are provided with a glazed internal balcony space (winter gardens). The 1 bed homes all benefit from Juliette balconies to the living room with the majority enjoying Juliette balconies to bedrooms as well with 49% of these incorporating an additional 5sqm+ of internal floor space in lieu of external private amenity space.
- 9.89 The development also includes 3 communal amenity spaces reserved for residents. There is a managed podium garden on the mezzanine offering a total of 250sqm of amenity space; and at floors 37 and 43 there will be resident roof gardens, providing 430sqm space with views across the city. In terms of other spaces, the development also provides the woodland winter garden amenity area of 360sqm fronting onto George Street and the new pedestrian link between College Road and George Street providing a further 310sqm of public realm. The development will also deliver of public realm improvements to the east of the site fronting Mondial House in excess of 700sqm. Overall, the provision and quality of private and communal amenity space is considered to be good and of a high standard.
- 9.90 Policy 3.6 of the London Plan states that housing development proposals should make a provision for play and informal recreation for children and young people. According to Housing SPG standard 1.2.2, the development is required to make appropriate play provisions in accordance with a GLA formula and calculation tool, whereby 10sqm of play space should be provided per child, with under-5 child play space provided on-site as a minimum, in accordance with the London Plan 'Shaping Neighbourhoods: Play & Informal Recreation SPG'.

9.91 Based on the current unit breakdown and as per the SPG, the child yield is expected to be 33 children, with 19 under the age of five, requiring 330sqm of play-space including 190sqm of doorstep play. Due to the established planning history with regards to building coverage and scheme viability and deliverability and the constraints of the site, the development only proposes to provide 40sqm of informal doorstep play within the podium garden. Given that the child yield in 'Build to Rent' projects is generally lower than 'Build to Purchase' schemes and the podium garden provides 250sqm of amenity space, it is acceptable that the SPG requirements can be applied flexibly in this instance. The applicant has stated that the remainder of the required play-space would be provided off site within Croydon Town Centre. There are a number of open spaces very near to the site, such as Queen Square Gardens located approximately 400m to the south, Waddle Park to the west and Park Hill Park to the west of the application site. Given the 290sqm shortfall in play-space, a financial contribution towards providing improved play space at Queens Square Gardens (or a suitable alternative location) would be secured by S106 legal agreement.

Privacy

9.92 Standard 5.1.1 states that habitable rooms should be provided with suitable privacy. 18-21m is indicated as a suitable minimum distance between facing habitable rooms, although the standard notes that "*adhering rigidly to these measures can limit the variety of urban spaces and housing types in the city and can sometimes unnecessarily restrict density.*"

9.93 Given the orientation of the windows within the two tower blocks and the use of recessed angled facade panels, mutual overlooking within both the development site and with St Matthews House would be avoided and in the latter's case would be no worse than the extant permission already granted.

Daylight and sunlight conditions for future residents

9.94 The development should also seek to ensure that adequate sunlight and daylight is provided to individual flats. The internal daylight/sunlight assessment prepared by Malcolm Hollis confirms that the residential units will comply with BRE guidance in terms of daylight and sunlight amenity for proposed residents and makes the following conclusions.

Internal Daylight

9.95 Of the sample of 408 rooms within the proposed development tested for daylight (ADF), 305 (75%) will meet the target values as set out in the BRE guidelines. This would be a similar level to the 2015 extant permission. Although the results indicate that the majority of the rooms tested in the proposed development will meet the ADF target criteria as defined by the BRE guidance, a number did not and they comment as follows:

- The sample of tests undertaken was for the lowest 12 floors. The higher floors will receive incrementally more daylight due to the reduction in obstructions from the consented developments adjacent. Therefore the overall compliance rate would increase.

- It would be possible to optimise the interior daylight levels by using light coloured internal finishes. This would potentially increase the ADF readings and result in better daylight distribution through inter-reflection.

9.96 Of the sample of 408 rooms tested for daylight distribution, 220 (54%) will meet the target criterion as set out in the BRE guidelines. The level of daylight received to the lowest 12 floors of the building will be comparable to the 2015 extant permission and the results overall indicate that the majority of the rooms in the proposed development will receive excellent daylight distribution as defined by the BRE guidance. A number, however, will receive lower levels and they comment as follows:

- As with ADF above, the sample of tests undertaken was for the lowest 12 floors. The higher floors will receive incrementally better daylight distribution, due to the reduction in obstructions from the consented developments adjacent. Therefore the overall compliance rate would increase.
- The BRE guide suggests that the DD target principally applies to living rooms and is less important in kitchens and bedrooms. The vast majority of areas in the proposal where the DD levels are lower are within the bedrooms or the kitchen areas of the living/dining/kitchen rooms, where task lighting will be used. Therefore, in general, the living rooms meet the BRE criterion.

Internal Sunlight

9.97 The BRE guide contains specific guidance for sunlight to blocks of flats, because it is accepted that some units will unavoidably have a northerly facing prospect. The guidance states that the aim should be for each unit to have a main room which receives a 'reasonable amount' of sunlight. In total all but 48 of the living rooms tested fully meet the BRE criteria. The living rooms that do not fully meet the criteria do all receive some levels of sunlight to varying degrees. Therefore, on balance, the proposals do accord with the BRE guidance on sunlight to flats.

9.98 The assessments undertaken demonstrate that the proposed development largely accords with the BRE guidance. Where it does not, there are material mitigating factors which are cited in the daylight/sunlight assessment report submitted. The BRE guide is intended to be used flexibly, particularly where urban locations and tall buildings are concerned. Given the urban nature of the site and the emerging densities, arising from the consented tall buildings and the future adjacent proposals, we consider the proposed building to be appropriate from a natural light perspective. Furthermore, the results correlate with the 2015 consented scheme for the site (LBC Ref 14/01594/P) which further demonstrates that it is appropriate for the location.

Environmental Impacts

Contamination

9.99 Chapter 13 of the NPPF relates to facilitating the sustainable use of minerals and seeks to (in part) ensure that permitted operations do not have unacceptable adverse impact on migration of contamination from the site.

9.100 Policy 5.21 of the London Plan supports the remediation of contaminated sites and that the development of brownfield sites does not result in significant harm to human health or the environment and to bring contaminated land to beneficial use.

- 9.101 Croydon Local Plan: Strategic Policies 6.3 requires development to positively contribute to improving air, land, and noise and water quality by minimising pollution. UDP Saved Policies 2013 EP2 and EP3 seek to ensure that the land is suitable for the proposed use and require that an investigation into the extent of any possible contamination with any remedial measures is provided before any application can be determined. Policy EP3 allows for remediation to be secured via an appropriate planning condition or planning obligation if appropriate.
- 9.102 A geo-environmental desk study has been submitted with the application which indicates that there may be potential soil contamination risks mainly associated with the sites former use as railway land. The report recommends that an intrusive site investigation is carried out. It is considered that a condition related to contaminated land is appropriate.

Air pollution, noise and vibration

- 9.103 Policy 7.14 of the London Plan states that the Mayor will work with strategic partners to ensure that the spatial, climate change, transport and design policies of his plan support the implementation of his Air Quality Strategy to achieve reductions in pollutant emissions and public exposure to pollution. It also states that development should be 'air quality neutral' and not lead to further deterioration of existing poor air quality (such as areas designated as Air Quality Management Areas). The whole of Croydon Borough has been designated as an Air Quality Management Area – AQMA.
- 9.104 Chapter 11 of the NPPF also requires planning policies and decisions to avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development; mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from noise from new development; and to recognise that development will often create some noise. Chapter 13 states that when determining planning applications, local planning authorities should ensure that any unavoidable noise, dust and particle emissions and any blasting vibrations are controlled, mitigated or removed at source.
- 9.105 Policy 7.15 of the London Plan states that development proposals should seek to minimise the existing and potential adverse impacts of noise on, from, within or in the vicinity of development proposals. Croydon Local Plan: Strategic Policies 6.3 requires development to positively contribute to improving air, land, and noise and water quality by minimising pollution. Policy EP1 of the UDP Saved Policies 2013 refers to the pollution of water, air or soil or pollution through noise, dust, vibration, light heat or radiation.
- 9.106 The effects on air quality associated with the completed development would result from the significant change of use of the site former commercial use to a predominately residential development. Whilst the submitted Air Quality Impact Assessment indicates that the proposed building would result in negligible air quality impacts, the authority requires that the proposed building should be air quality neutral. The developers would be required to complete the Croydon Development Emission Tool (CDET) which is an Excel based building modelling tool. CDET focuses on quantifying the levels of the air pollutants from homes, commercial buildings and other non-industrial buildings. This could be secured through a condition requiring the submission of a Low Emission Strategy.

- 9.107 Given the central location of the development in an area of high human exposure there is a requirement for this development to incorporate a S106 contribution for air quality. As such a S106 air quality contribution is required to ensure air quality benefits are realised.
- 9.108 The application is accompanied by a noise assessment which indicates that the internal noise conditions for future residents will be acceptable provided that appropriate noise mitigation is put in place. It is recommended that compliance with the measures identified in the report and details of any plant and machinery be secured by condition.
- 9.109 As a large scale development, the construction phase would involve very large scale operations and is likely to be elongated. As the potential for significant adverse environmental effects during this phase is large, a Construction Logistics Plan and an Environmental Management Plan should therefore be secured by condition.

Water resources and flood risk

- 9.110 Policy 5.12 states that development proposals must meet flood risk assessment and management requirements. CLP1 Policy SP6.4 states that the Council will seek to reduce flood risk and protect groundwater and aquifers.
- 9.111 The London Plan SPG states new development should incorporate Sustainable Urban Drainage Systems and green roofs where practical with the aim of maximising all opportunities to achieve a Greenfield run-off rate, increasing biodiversity and improving water quality. Greenfield runoff rates are defined as the runoff rates from a site, in its natural state, prior to any development. Typically this is between 2 and 8 litres per second per hectare. Surface water run-off is to be managed as close to source as possible.
- 9.112 A Flood Risk Assessment has been submitted and whilst information has been submitted that assesses flooding and drainage matters associated with the development and indicating that the development is not likely to result in an increased flood risk, additional information will need to be submitted. Conditions are recommended to ensure a detailed drainage scheme that incorporates SuDS as requested by the Lead Local Flood Authority (LLFA) is delivered.
- 9.113 The LLFA are satisfied that drainage can be addressed through the imposition of suitable planning conditions (which are recommended). As such the impact of the development on water resources and flood risk is considered to be acceptable and in accordance with the provisions of local and national policy.

Wind microclimate

- 9.114 Policy 7.7 of the London Plan states that tall buildings should not have an unacceptable harmful impact on their surroundings and should not adversely affect microclimate or wind turbulence. CLP1 Policy SP4.6 states that tall buildings will be required to minimise their environmental impacts. Paragraph 6.71 states that tall buildings will need to demonstrate how their designs do not have a negative impact on environmental conditions, including wind.
- 9.115 The wind microclimate impact is considered in relation to both adjoining occupiers and users of the adjoining highway. The boundary layer wind tunnel study allows

the pedestrian level wind environment at the site to be quantified and classified in terms of suitability for current and planned usage, based on the industry standard Lawson criteria for pedestrian comfort and safety. The study combines measured pedestrian level wind speeds at key areas in and around the site with long-term wind frequency statistics to determine the probability of local wind speeds exceeding comfort and safety thresholds for a range of common pedestrian activities based on the industry standard Lawson criteria. This defines the type of activities for which the wind conditions would be safe and comfortable.

- 9.116 The study takes into account the recent developments approved at Mondial House and the Croydon College sites and concludes that wind conditions throughout the highways surrounding the site would be acceptable, provided that trees are installed within the landscaping as specified in order to mitigate the potential wind tunnel effect. The following wind mitigation measures are proposed (and would be secured by way of planning conditions and obligations):
- 9.117 In relation to wind conditions at the entrances to St. Matthews House, it is noted that they sit upwind of the development for the critical / key wind directions – and are therefore unlikely to be affected by the development. The wind conditions would be suitable for entrance use at these locations with the development (and associated recommended mitigation measures) in place.

Transportation, Access and Parking

- 9.118 Chapter 4 of the NPPF seeks to promote sustainable transport. London Plan Policies 6.3 and 6.13 and Croydon Plan Policies T2 and T8 require that development is not permitted if it would result in significant traffic generation which cannot be accommodated on surrounding roads. They also require that acceptable levels of parking are provided. Disabled parking spaces are required by Policy 6.13 of the London Plan and the accompanying Housing SPG.
- 9.119 Policy 6.9 of the London Plan states that secure, integrated and accessible cycle parking should be provided by new development in line with minimum standards. These are 1 space for each 1 bedroom unit and 2 spaces for 2 bedroom + units.
- 9.120 The site is in an area with a Public Transport Accessibility (PTAL) rating of 6b (on a scale of 1a - 6b, where 6b is the most accessible), as indicated on maps produced by TfL. The site is therefore considered to have an excellent level of accessibility to public transport links. The proposal is predominantly car-free with the exception of 28 dedicated disabled bays proposed within the basement, which the applicant has provided at significant expense to the scheme in response to pre-application discussions. These spaces form the extent of the total parking provision for the development. This level of provision (5% of the total) is considered to be acceptable by both the Council's Transportation Section and TfL and would provide a satisfactory level of car parking for the wheelchair accessible or easily adaptable units proposed. Further provision (taking overall provision to 10%) on such a tight site, would require the provision of a further sub-basement, which would eat into existing scheme viability and will have a negative impact on the quantum of affordable housing being delivered as part of these proposals.
- 9.121 786 cycle parking spaces are also proposed to be located predominantly within the basement with the remainder short term visitor spaces for the commercial uses provided at ground floor level next to the intended public realm area. This provision

meets the London Plan requirements for the site and is supported. The proposed service arrangements along College Road, layout of the proposed parking and proposed ramp access are also acceptable. It is important to restrict access to resident's car parking permits – which will be managed through the S.106 Agreement.

- 9.122 The Transport Assessment submitted with the application indicates that the scheme will generate additional trip generation. Transport for London have commented that this should be mitigated by a financial contribution towards buses and trams in the locality of the site. The proposal will involve the relocation of the existing public cycle parking stands close to the eastern boundary of the site. A Public Realm Cycle Parking contribution towards the relocation of the existing public cycle parking outside the site would therefore be required (the Applicant has agreed to meet this).
- 9.123 Given the scale of the development, it is considered that conditions requiring the submission of a detailed Travel Plan, Construction Logistics Plan and Delivery and Servicing plan are warranted in order to ensure that both the construction phase of the development and the operation phase of the development (once occupied) do not result in undue impacts upon the surrounding highway network. TfL is currently working with the applicant and Council to agree the construction methodology which will feed into the construction and logistics to be secured by condition.

Sustainability

- 9.124 At the heart of the NPPF is a presumption in favour of sustainable development. It states: *'Planning plays a key role in shaping places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impact of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure'*.
- 9.125 The NPPF actively promotes developments which reduce greenhouse gas emissions (para 95). In determining planning applications it states that local planning authorities should expect development to comply with local policies and expect that layout of development in a manner that would reduce energy consumption through building orientation, massing and landscape (para 96).
- 9.126 Policies 5.2 and 5.3 of the London Plan state that development proposals should minimise carbon dioxide emissions and exhibit the highest standards of sustainable design and construction, whilst policy 5.7 states that they should provide on-site renewable energy generation. London Plan policy 5.5 states that Boroughs should seek to create decentralised energy networks, whilst Policy 5.6 requires development proposals to connect to an existing heating network as a first preference if one is available.
- 9.127 Policy SP6.2 from the borough's Local Plan Strategic Policies sets out the Council's expectations in relation to energy and CO2 reduction, in accordance with the London Plan. It states that it would be expected that high density residential development would (a) incorporate site wide communal heating systems, and (b) that major development will be enabled for district energy connection unless demonstrated not to be feasible or financially viable to do so.
- 9.128 The Sustainability and Energy Assessment submitted with the application demonstrate that the proposal has been prepared in accordance with relevant

strategic and local planning policies to provide a high quality and sustainable building in this key central location.

- 9.129 The fundamental principle on which the sustainability policies are based is an expectation that development will follow the energy hierarchy: be lean (use less energy), be clean (supply energy efficiently), and be green (use renewable energy).
- 9.130 The energy strategy is based on a two-steps strategy, where a connection to a future heat network for the site will be available as confirmed by Croydon Council. Initially, the building is provided with a communal gas fired boiler system that will provide the towers' energy needs and the capability of connecting to the future external heat network.
- 9.131 The development will be built to a high specification prioritising a passive 'fabric first' approach with the contribution of high fabric efficiency, good air tightness levels, efficient building services and renewable energy generation. On-site renewable energy generation will be provided through the use of roof mounted photovoltaic panels that will contribute to the CO2 reductions in accordance with London Plan Policies 5.2 and 5.7.
- 9.132 In addition to the high energy efficiency and fabric performance, the dwellings will also reduce the use of potable water below 105 litres/person/day using water efficiency fittings.
- 9.133 The proposed development will incorporate a range of energy efficiency measures including levels of insulation exceeding current Building Regulations requirement, the installation of high performance glazing, energy efficient lighting, and natural ventilation in all habitable spaces. The implementation of these measures would potentially reduce regulated CO2 emissions by 14.69%, when compared to a notional built to current Part L Building Regulations (2013).
- 9.134 The Council's policy requires zero carbon and also requires non-residential parts of a scheme to be constructed to BREEAM "Excellent" standards. The carbon dioxide savings proposed fall short of the policy requirement. The Council would accept a cash in lieu payment to be secured through a S106 legal agreement and the applicant has accepted this.
- 9.135 To future proof the development provision would need to be made for connections and space within the buildings to allow connection to any future Croydon District Heating Network, should such a network come forward. This provision would be secured through an appropriate clause in the S106 legal agreement and by conditions to secure all relevant pipe work from the buildings to the edge of the site (to allow easy connection).

Other Planning Issues

Employment and training

- 9.136 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 and an employment and skills strategy.

Designing Out Crime

- 9.137 For a building of this nature, the main considerations would relate to counter terrorism, access to the building and the areas of public realm around the building.
- 9.138 Discussions have taken place with the Designing out Crime Officer and the proposed development would incorporate principles of Secured by Design. Conditions requiring CCTV, delivery and servicing plan, public realm management plan and a car park management plan will ensure that the proposed development provides a safe and secure environment.

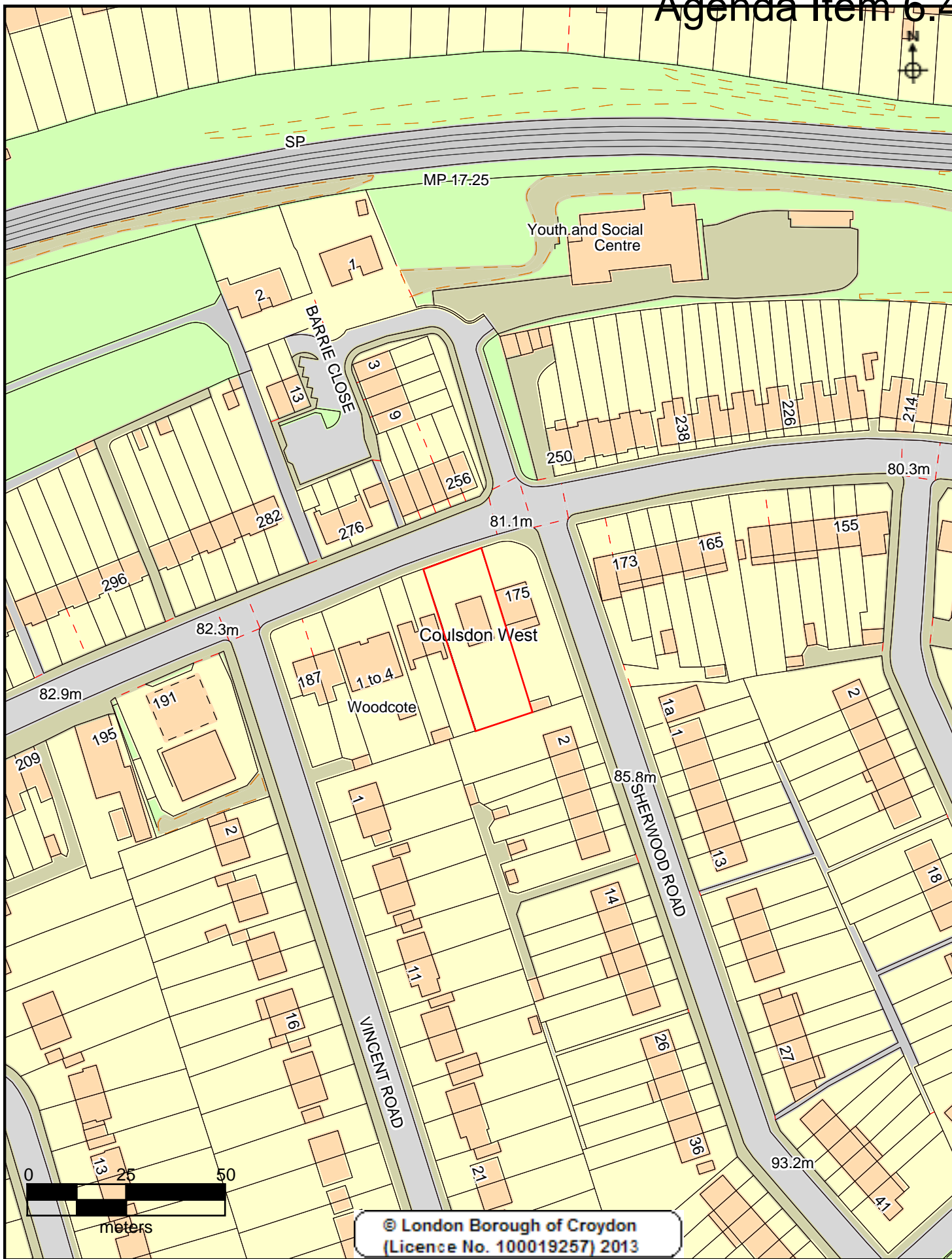
Telecommunications and aircraft

- 9.139 As tall buildings are proposed, the development has the potential to create electronic interference within surrounding buildings. However, a section 106 legal agreement clause is recommended to ensure that any potential adverse impact is mitigated at the applicant cost.
- 9.140 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 and the development is therefore considered acceptable in this regard.

Conclusions

- 9.141 All other relevant policies and considerations, including equalities, have been taken into account. Planning permission should be granted for the reasons set out above. The details of the decision are set out in the RECOMMENDATION.

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PART 6: Planning Applications for Decision

Item 6.4

1.0 SUMMARY OF APPLICATION DETAILS

Ref: [17/03851/FUL](#) (*Link to associated documents on Planning Register*)
 Location: 177 Chipstead Valley Road, Coulsdon, CR5 3BR
 Ward: Coulsdon West
 Description: Demolition of the existing bungalow; erection of a two storey development with roof accommodation comprising 3x2 bedroom, 2x1 bedroom and 1x3 bedroom flats; provision of 3 parking spaces; cycle parking and refuse storage; and external amenity space.
 Drawing Nos: P001, P004 P4-A, P400 P2-A, P401 P2, P402 P2-A, P403 Rev A, P501Rev A, P502 Rev A, P504 Rev A, P506 Rev A, P507 Rev A
 Applicant: Mr A Howell
 Agent: Mr S Grainger
 Case Officer: Georgina Betts

	1 bed	2 bed	3 bed
Flats	2 (2 persons)	3 (2x3 persons & 1x 4 person)	1 (5 person)

Number of car parking spaces	Number of cycle parking spaces
3	6

1.1 This application is being reported to Planning Committee because objections above the threshold in the Committee Consideration Criteria have been received.

2.0 RECOMMENDATION

- 2.1 That the Planning Committee resolve to GRANT planning permission.
- 2.2 That the Director of Planning and Strategic Transport has delegated authority to issue the planning permission and impose conditions and informatives to secure the following matters:

Conditions

- 1. In accordance with the approved plans
- 2. Details of parking arrangements, visibility splays, garden and communal areas and refuse stores to be provided as specified within the application
- 3. Details of the security/external lighting and cycle store to be submitted to and approved.
- 4. Window restrictions in eastern and western elevations other than as specified
- 5. Samples of the external facing materials to be approved
- 6. Hard and soft landscaping details to be approved (to include SUDS)

7. Water usage and Carbon Dioxide emission reduction
8. In accordance with Sections 6.0 and 7.0 of the Flood Risk Assessment
9. Works to commence within 3 years
10. Any other planning condition(s) considered necessary by the Director of Planning and Strategic Transport

Informatives

- 1) Site notice removal
- 2) Community Infrastructure Levy
- 3) Code of practise for construction sites
- 4) Any other informative(s) considered necessary by the Director of Planning and Strategic Transport

3.0 PROPOSAL AND LOCATION DETAILS

Proposal

3.1 The applicant seeks full planning permission for the following:

- Demolition of the existing bungalow
- Erection of a two storey building with accommodation in roof-space comprising 1x3 bed, 2x1 bed and 3x2 bed apartments
- Provision of 3 car parking space and 6 cycle spaces
- Provision of refuse and cycle stores
- Associated hard and soft landscaping

3.2 The main differences between this scheme and the 2016 scheme which was previously refused planning permission (LBC Ref 16/04962/FUL) are as follows:

- The loss of the bungalow has been overcome by the provision of a three bedroom 5 person dwelling with appropriate parking and amenity space
- The building mass has been reduced and re-designed to limit its impact upon 175 Chipstead Valley Road.
- The building has been re-designed.
- The forecourt parking areas utilises the existing access providing a well-designed and safe parking area.
- Sufficient information has been submitted as part of this application to satisfy officers that potential ecological issues have been assessed and satisfied.

3.3 Amended plans were received during the course of the application which lowered the proposed eaves height of the main roof slope to maintain consistency with eaves details associated with the prominent gable features. The amendment now before Committee is considered to better respect the character of the surrounding area while providing an appropriate design solution.

Site and Surroundings

- 3.4 The application site lies on the southern side of Chipstead Valley Road and is currently occupied by a single storey detached bungalow sited approximately 11 metres from the adjacent highway.
- 3.5 The surrounding area is residential in character and comprises of a mix of single/two storey detached, semi-detached and terraced properties with a recently completed flatted scheme nearby.
- 3.6 The application site lies within an area at risk of surface water and critical drainage flooding as identified by the Croydon Flood Maps while Chipstead Valley Road is classified as a Local Distributor Road. The site is not subject to a Tree Preservation Order.

Planning History

- 3.7 The following planning decisions are relevant to the application:
- 3.8 Planning permission was refused on the 5th May 2016 for the demolition of an existing bungalow; erection of two storey building with accommodation in roof-space comprising 4x2 bedroom and 2x1 bedroom flats; formation of vehicular access and provision of associated parking (LBC Ref 16/01158/P) on the following grounds,
 - 1. The proposed development would result in the loss of a small family house.
 - 2. The development would be detrimental to the residential amenities of the occupiers of the adjoining property by reason of visual intrusion and loss of outlook.
 - 3. The development could harm ecological interests on site.
 - 4. The development would be detrimental to the visual amenity of the street scene by reason of its design and appearance.
 - 5. The design and layout of the parking area and access would not be safe, secure, efficient and well designed.
- 3.9 Planning permission was refused on the 23rd November 2016 for the erection of two-storey building with accommodation in roof-space comprising 3x1 bedroom, 2x2 bedroom and 1x3 bedroom flats. Formation of vehicular access and provision of associated parking - all following the demolition of the existing dwelling (LBC Ref 16/04962/FUL) on the following grounds:
 - 1. The proposed development would result in the loss of a small family house.
 - 2. The development would be detrimental to the residential amenities of the occupiers of the adjoining property by reason of visual intrusion and loss of outlook.
 - 3. The development would be detrimental to the visual amenity of the street scene by reason of its design and appearance.
 - 4. The design and layout of the parking area and access would not be safe, secure, efficient and well designed.

4.0 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The previous grounds for refusal have been suitably overcome
- The principle of the development is acceptable given the residential character of this part of Coulsdon.
- The design and appearance of the development is appropriate given the context of surrounding area.
- The living conditions of adjoining occupiers would be protected from undue harm
- The living standards of future occupiers are satisfactory and meet the National Housing Space Standards
- The highway impact is considered acceptable
- Sustainability and flooding aspects can be controlled by condition

5.0 CONSULTATION RESPONSE

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

6.0 LOCAL REPRESENTATION

6.1 The application has been publicised by way of one or more site notices displayed in the vicinity of the application site. 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: 24 Objecting: 24 Supporting: 0

6.2 The following issues were raised in representations. Those that are material to the determination of the application, are addressed in substance in the MATERIAL PLANNING CONSIDERATIONS section of this report:

Objections:

- Lack of parking provision
- Over development
- Lack of affordable housing
- Pressure on local school places
- Over crowding
- Danger to highway safety

7.0 RELEVANT PLANNING POLICIES AND GUIDANCE

7.1 In determining any planning application, the Council is required to have regard to the provisions of its Development Plan so far as is material to the application and to any other material considerations and the determination shall be made in accordance with the plan unless material considerations indicate otherwise. The Council's adopted Development Plan consists of the Consolidated London Plan 2015, the Croydon Local Plan: Strategic Policies 2013 (CLP1), the Croydon

Replacement Unitary Development Plan 2006 Saved Policies 2013 (UDP) and the South London Waste Plan 2012.

7.2 Government Guidance is contained in the National Planning Policy Framework (NPPF), issued in March 2012. 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:

- Promoting sustainable transport;
- Delivering a wide choice of high quality homes;
- Requiring good design.

7.3 The main policy considerations raised by the application that the Committee are required to consider are:

- 3.3 Increasing housing supply
- 3.4 Optimising housing potential
- 3.5 Quality and design of housing developments
- 3.8 Housing choice
- 5.1 Climate change mitigation
- 5.2 Minimising carbon dioxide emissions
- 5.3 Sustainable design and construction
- 5.12 Flood risk management
- 5.13 Sustainable drainage
- 5.16 Waste net self sufficiency
- 6.3 Assessing effects of development on transport capacity
- 6.9 Cycling
- 6.13 Parking
- 7.2 An inclusive environment
- 7.3 Designing out crime
- 7.4 Local character
- 7.6 Architecture
- 7.21 Woodlands and trees

7.4 Croydon Local Plan: Strategic Policies 2013 (CLP1):

- SP1.1 Sustainable development
- SP1.2 Place making
- SP2.1 Homes
- SP2.2 Quantities and location
- SP2.6 Quality and standards
- SP4.1 and SP4.2 Urban design and local character
- SP4.11 regarding character
- SP6.1 Environment and climate change
- SP6.2 Energy and carbon dioxide reduction
- SP6.3 Sustainable design and construction

- SP6.4 Flooding, urban blue corridors and water management
- SP8.6 and SP8.7 Sustainable travel choice
- SP8.12 Motor vehicle transportation
- SP8.17 Parking

7.5 Croydon Replacement Unitary Development Plan 2006 Saved Policies 2013 (UDP):

- UD2 Layout and siting of new development
- UD3 Scale and design of new buildings
- UD6 Safety and security
- UD7 Inclusive design
- UD8 Protecting residential amenity
- UD13 Parking design and layout
- UD14 Landscape design
- UD15 Refuse and recycling storage
- NC4 Woodlands, trees and hedgerows
- T2 Traffic generation from development
- T4 Cycling
- T8 parking
- H2 Supply of new housing

7.6 Supplementary Planning Guidance

- London Housing SPG March 2016

7.7 The Partial Review of Croydon Local Plan: Strategic Policies (CLP1.1) and the Croydon Local Plan: Detailed Policies and Proposals (CLP2) have been approved by Full Council on 5 December 2016 and was submitted to the Planning Inspectorate on behalf of the Secretary of State on 3 February 2017. The examination took place between 18th May and 31st May 2017. Policies which have not been objected to can be given some weight in the decision making process. Policies which have not been objected to can be given some weight in the decision making process. However at this stage in the process no policies are considered to outweigh the adopted policies listed here to the extent that they would lead to a different recommendation.

8.0 MATERIAL PLANNING CONSIDERATIONS

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

- Principle of development
- Townscape and visual impact
- Housing quality for future occupiers
- Residential amenity for neighbours
- Transport
- Sustainability
- Trees

- Ecology
- Flood Risk

Principle of development

- 8.2 The application site lies within an established residential area which comprises a mix of flatted and single dwelling development. The principle of the development is therefore considered acceptable subject to further considerations listed below.

Townscape and visual impact

- 8.3 The two storey massing (with accommodation in roof space) seeks to respect the street scene by ensuring continuity of the established ridge line with the proportions and architectural detailing respecting neighbouring buildings. The building would sit comfortably within its plot with adequate spacing to both side boundaries with generous communal space provided to the rear.
- 8.4 The design of the building picks up on local distinctiveness such as timber and brick detailing with elements of white render. Whilst the design of the building would not take cues from its immediate neighbours, it would be similar to a development at 193-195 Chipstead Valley Road. The architectural detail would provide visual interest within the street scene while acting as a catalyst for quality regeneration within the Coulsdon area. This side of Chipstead Valley Road is characterised by parking in the frontage and the proposal provides a suitable balance of hard and soft landscaping.
- 8.5 The overall scale, massing and design is considered appropriate in respect of the above policies and is considered to be in keeping with the character and appearance of the surrounding area.

Housing quality for future occupiers

- 8.6 The layout, including the outlook from each unit would be acceptable. There would be a communal amenity area to the rear of the flats. Furthermore, the ground and first floor flats would have access to private amenity space in the form of a patio or balcony. Adequate provision has been made for communal and private amenity space along with suitable flat and room sizes which are all dual aspect and should meet the needs of future residential occupiers and as such would comply with the above policies.

Residential amenity for neighbours

- 8.7 The depth of the building is considered acceptable in respect of the relationship to the neighbouring properties at 175 and 179 Chipstead Valley Road given the presence of neighbouring extensions, the modest rearward projection and central mass together with associated separation distances. There are no habitable room windows in the eastern flank of 179 Chipstead Valley Road.

- 8.8 In the previous application, concerns were raised about the proximity of the development to a neighbouring window at 175 Chipstead Valley Road. From the Council's planning records, planning permission was granted on the 17th June 1999 for the retention of alterations to the roof of this neighbouring property. This consent included the enlargement of the existing dormer windows at 175 Chipstead Valley Road, which included the provision of a sole habitable room window, serving a first floor bedroom on the western roof slope directly facing onto 177 Chipstead Valley Road. The outlook from this habitable room window would face directly onto the development and was an issue to be addressed as part of this application.
- 8.9 The latest proposal has stepped the development approximately 0.6 metres further away from 175 Chipstead Valley Road with a staggered flank wall from the previous application, while the eaves height has been reduced. Given these changes, it is considered that the applicant has sought to secure a good level of outlook from this side facing window. It should also be noted that the eastern flank wall at first floor and above is shown to be finished in white render to aid reflective light towards the side window to 175 Chipstead Valley Road. For the reasons given above the development is not considered to result in demonstrable harm to the amenities of 175 Chipstead Valley Road. The development would have an acceptable relationship with 179 Chipstead Valley Road while the window in the first floor of the eastern flank of this neighbouring property serves a stairway/landing.

Transport

- 8.10 The subject site is in an area with a PTAL accessibility rating of 2 (on a scale of 1a - 6b, where 6b is the most accessible), as indicated on maps produced by TfL. The site is therefore considered to have poor access to public transport links.
- 8.11 Provision has been made for 3 on-site parking spaces which includes one disabled bay and a bay designated for the 3 bedroom 5 person unit. Provision is also made for on site for cycle storage – whilst it is appreciated that provision would fall slightly below London Plan standards. However, provision could be dealt with by way of a planning condition securing 10 on-site cycle spaces.
- 8.12 The applicant has undertaken a parking stress survey in accordance with the Lambeth Methodology but has also included surveys throughout the day (between 07:30 hours and 19:30 hours). The parking stress surveys were carried out on Wednesday 5th July and Thursday the 6th July 2017. In accordance with the Lambeth Methodology the survey included streets that were generally within a 200 metre walk distance of the site. In summary, the results of the parking stress survey indicate average levels of 'overnight' parking stress of 57%. When scrutinising the overnight surveys it is apparent that 6–7 on-street parking spaces were available within Sherwood Road and 15–17 spaces were available within Vincent Road. Sherwood Road and Vincent Road are the two streets that are adjacent to the site and are perhaps the most likely to be subject to any overspill parking impacts as a result of the development proposals. On the basis of the survey it is apparent that sufficient on-street parking capacity exists within the neighbouring streets to accommodate any overspill parking impacts.

- 8.13 Given the type of accommodation proposed, the result of the survey and the need to encourage sustainable transport choice the level of parking proposed is considered acceptable.
- 8.14 Saved Policy UD13 of the Croydon Plan (2006) Saved Policies 2013 requires car parking and access arrangements to be safe, secure, efficient and well designed. The applicant has demonstrated through the provision of pedestrian visibility splays and a swept path analysis that the proposed access and parking area would be safe and efficient.
- 8.15 Refuse collection would be via Chipstead Valley Road as other neighbouring developments and would be sited within 20 metres of the highway. This arrangement is acceptable on highway grounds.

Sustainability

- 8.16 CLP: SP Policy SP6.3 (Sustainable design and construction) requires all new build housing to achieve Code for Sustainable Homes Level 4 *or equivalent*. As such it is recommended that a condition is attached requiring the applicant to achieve a 19% reduction in CO2 emissions while ensuring that water consumption does not exceed 110L per head per day.

Trees

- 8.17 No trees of merit would be removed to accommodate the development and the site is capable of providing a meaningful landscaping scheme. As such it is recommended that such matters are secured via condition.

Ecology

- 8.18 Following the previous refusal, matters surrounding ecology have been adequately addressed and the proposal is not considered to harm any protected species within the site or surrounding areas.

Flood Risk

- 8.19 The site lies within an area at risk of surface water and critical drainage flooding. The submitted Flood Risk Assessment specifies mitigation and options which can be controlled by condition.

Affordable Housing

- 8.20 The threshold for affordable housing is set at 10 units and therefore at 6 units, the scheme is not required under current policy to provide any on site affordable housing.

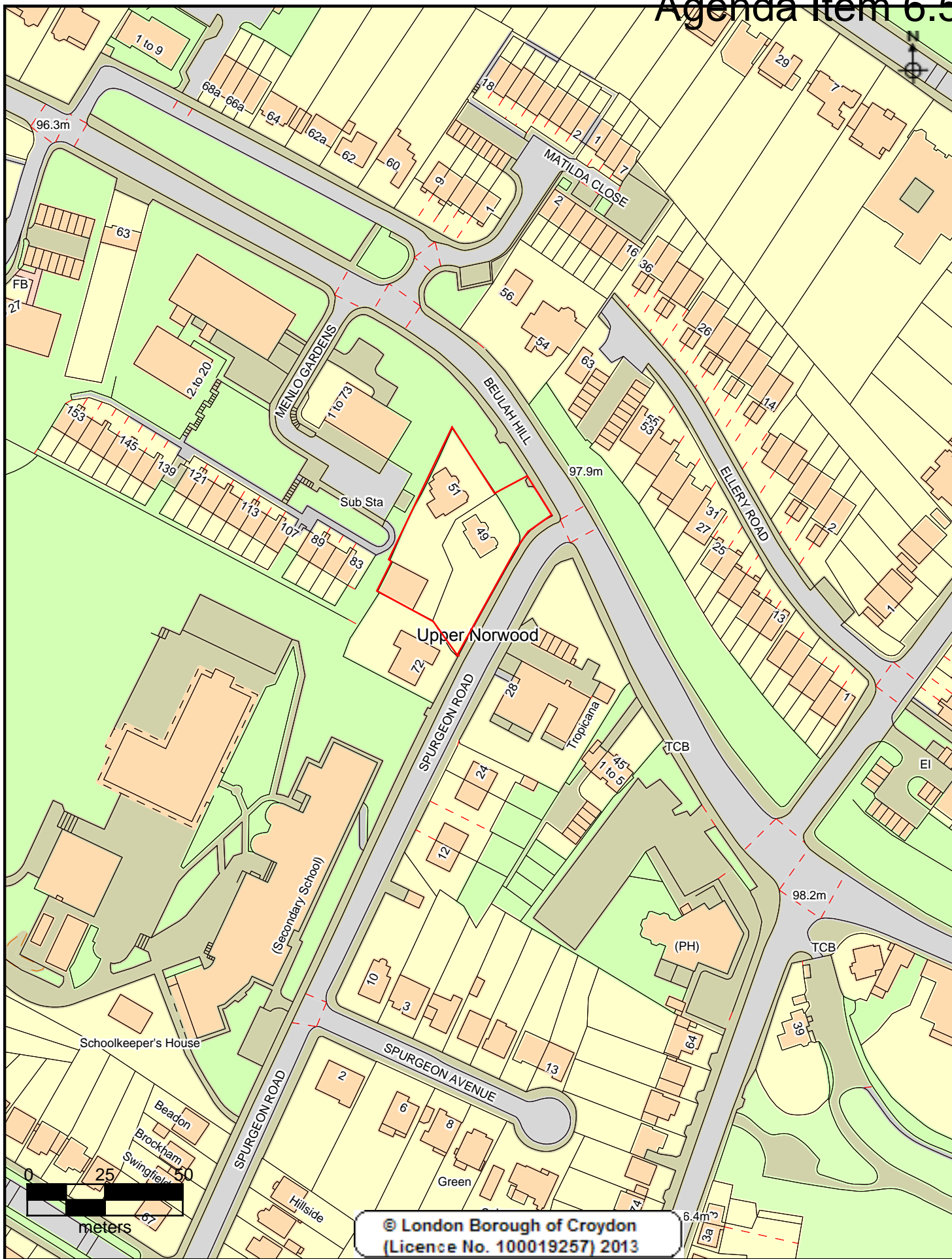
Pressure on School Places

- 8.21 Representations have raised concerns that the development would put pressure on local school places. As part of the planning process, certain types of development are liable for a Community Infrastructure Levy which is charged against new floor space. This development would be liable for CIL payments for the Council's CIL and Mayoral CIL. The payment would contribute to maintaining local services such as education facilities, health care facilities, public open space, sports and leisure and community facilities as well as transport links through the Mayoral CIL.

Conclusions

- 8.22 The proposal would result in the redevelopment of the site which would provide 5 additional homes in the borough. The development would be in keeping with the character of the area and would not have a significant impact on the amenities of adjoining occupiers. Landscaping, parking, energy systems and sustainable drainage are all acceptable in principle and can be secured by condition.
- 8.23 All other relevant policies and considerations, including equalities, have been taken into account.

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PART 6: Planning Applications for Decision

Item 6.5

1 SUMMARY OF APPLICATION DETAILS

Ref: [17/03208/FUL](#) (Link to associated documents on Planning Register)
 Location: 49-51 Beulah Hill, Upper Norwood, SE19 3DS
 Ward: Upper Norwood
 Description: Demolition of two existing buildings: erection of a part 6, part 7 storey building (Block A) and part 4, part 5 and part 6 storey building (Block B) comprising a total of 30 flats (5 x 1-bedroom; 17 x 2-bedroom; 6 x 3-bedroom; and 2 x 4-bedroom flats) and a 2-storey building (Block C) comprising 3 x 3-bedroom townhouses with the provision of 17 car parking spaces (including wheelchair accessible parking), 60 cycle parking spaces, refuse and recycling area, associated landscaped communal amenity areas and formation of vehicular access
 Drawing Nos: 16002(PL)099B-EXISTING_; 16002(PL)101C-PROPOSED PLAN_BASEMENT; 16002(PL)102D-PROPOSED PLAN_LOWER GROUND; 16002(PL)103E-PROPOSED PLAN_GROUND; 16002(PL)104C-PROPOSED PLAN_FIRST; 16002(PL)105C-PROPOSED PLAN_SECOND; 16002(PL)106C-PROPOSED PLAN_THIRD; 16002(PL)107B-PROPOSED PLAN_FOURTH; 16002(PL)108B-PROPOSED PLAN_FIFTH; 16002(PL)110-PROPOSED PLAN_SIXTH; 16002(PL)109B-PROPOSED PLAN_ROOF; 16002(PL)110B-PROPOSED ELEVATIONS AA BB; 16002(PL)111B-PROPOSED ELEVATION CC; 16002(PL)112A-PROPOSED ELEVATIONS DD EE; 16002(PL)113B-PROPOSED ELEVATIONS FF GG HH; 16002(PL)127B-Proposed Block C; 16002(PL)128-Proposed Block A&B; 16002(PL)129-Proposed Block A&B; 16002(PL)130-Proposed Block A&B; 16002(PL)131-Proposed Block A&B; 16002(PL)132-Proposed Block A&B; 16002(PL)133-Proposed Block A&B; 16002(PL)134-Proposed Block A&B; 16002(PL)135-Proposed Block A&B; 16002(PL)136-Proposed Block A&B; and 16002-BR-171010 Addendum rev_B.compressed.
 Applicant: Regent Land & Development Ltd
 Agent: GVA
 Case Officer: Michael Cassidy

	1 bed	2 bed	3 bed	4 bed	Total
Market Rent	4	11	9	2	26
Shared Ownership (Intermediate)	1	6	0	0	7
Total	5	17	9	2	33

Number of car parking spaces	Number of cycle parking spaces
17 (4 disabled)	60

- 1.1 This application is being reported to Planning Committee because the proposal is for a small scale major development and the Chair of the Planning Committee has requested that it be referred.

2 RECOMMENDATION

- 2.1 That the Planning Committee resolve to GRANT planning permission subject to:

- A. The prior completion of a S106 legal agreement to secure the following planning obligations:
- a) Affordable housing provision to include 7 residential units (21% of total) within Block A with all units (1 x 1-bed; and 6 x 2-bed units) being shared ownership;
 - b) Affordable housing review mechanism and nominations agreement(early and late stage review mechanisms in accordance with the Mayor of London Affordable Housing and Viability SPG 2017);
 - c) Carbon off set contribution of £64,200
 - d) Travel Plan
 - e) Car club
 - f) Restriction on parking permits
 - g) Air quality contribution of £3,300
 - h) Local Employment and Training Strategy and Employment Contribution of £19,865
 - i) TV signal mitigation
 - j) Retention of scheme architects (or a suitably qualified alternative architect)
 - k) Highway works - a S278 agreement to cover reinstatement of footway following removal of crossovers and any other associated highway works to facilitate the development
 - l) Monitoring fees (in accordance with the LB Croydon S.106 Planning Obligations/CIL Review 2017).

- 2.2 That the Director of Planning and Strategic Transport has delegated authority to negotiate the detailed term of the legal agreement, securing additional/amended obligations if necessary.

- 2.3 That the Director of Planning and Strategic Transport has delegated authority to issue the planning permission and impose conditions [and informatives] to secure the following matters:

Conditions

- 1) Time limit of 3 years
- 2) In accordance with approved plans

- 3) Full details of materials, including samples, and design detail
- 4) Typical façade details at 1:1
- 5) Details of hard and soft landscaping, including green and brown roofs, including children's play area
- 6) Tree Planting Strategy
- 7) Tree Protection Plan
- 8) Landscaping and public realm management and maintenance strategy
- 9) Proposal for the treatment of any gates proposed for the basement access
- 10) 10% of the dwellings shall be designed to be Category 3 'Wheelchair user dwellings'
- 11) 90% of the dwellings shall be designed to be Category 2 'Accessible and adaptable'
- 12) Provision of cycle parking and disabled resident parking prior to first occupation
- 13) Provision of electric and passive vehicle charging points
- 14) Submission of details of the car club
- 15) Details of refuse collection arrangements
- 16) Detailed Construction Logistics Plan (to include site waste management plan) and Construction Environment Management Plan
- 17) Submission of and compliance with detailed Travel Plan.
- 18) Details of Air handling units/Plant/Machinery and screening to be submitted
- 19) Photovoltaic panel details to be submitted
- 20) Noise standard compliance for living rooms and bedrooms
- 21) Piling method statement to be submitted
- 22) Compliance with Air Quality Assessment and submission of air quality Low emission strategy
- 23) Secured by Design
- 24) Petrol and oil receptors provided in car park areas
- 25) Submission of biodiversity enhancements
- 26) Submission of sustainable urban drainage strategy (detailing any on and/or off site drainage works)
- 27) Water consumption
- 28) Any other planning condition(s) considered necessary by the Director of Planning

Informatives

- 1) Development is CIL liable
- 2) Construction site code of conduct
- 3) Thames Water informative
- 4) Subject to a legal agreement
- 5) Any other planning condition(s) considered necessary by the Director of Planning and Strategic Transport.

2.4 That, if by 30th February 2018 the legal agreement has not been completed, the Director of Planning and Strategic Transport has delegated authority to refuse planning permission.

3 PROPOSAL AND LOCATION DETAILS

Proposal

3.1 The application seeks permission for the following:

- Demolition of two existing houses (Nos 49 and 51 Beulah Hill) and associated outbuildings;

- Erection of a part 6, part 7 storey building (Block A) and part 4, part 5 and part 6 storey building (Block B) comprising a total of 30 flats (5 x 1-bedroom; 17 x 2-bedroom; 6 x 3-bedroom; and 2 x 4-bedroom flats) and a 2-storey building (Block C) comprising 3 x 3-bedroom townhouses;
- The provision of 17 car parking spaces (including 4 disabled and 2 visitor parking spaces at basement level accessed from Spurgeon Road);
- The provision of 60 cycle parking spaces at basement and lower ground floor levels accessed from Spurgeon Road and within the building; and
- Amenity space areas including private balconies and rooftop amenity space for the future residents of Blocks A and B and private front and rear gardens for the townhouses (Block C). The development proposes a total of 174sqm of communal amenity area at lower ground level which equates to 5sqm per residential unit, in addition to private amenity space including, balconies, terraces and private gardens of which every unit benefits from at least one of these. A soft landscaped area is to be provided on the north east frontage onto Beulah Hill with the portion of Council owned open land being shown with indicative landscaping to illustrate how this area could be designed to complement the wider development.

3.2 Since its original submission, the proposal has been redesigned to retain the existing TPO Copper Beech Tree (T2) at the front of the application site. The following main amendments have been made:

- Unit Mix - a change in the mix of units, whereby the total number (33) of units has remained the same, but the number of family-sized units has been increased from 27% (41% in habitable rooms) to 33%;
- Layout - the original site layout of the frontage blocks was set in parallel with Beulah Hill and Spurgeon Road. The current building form along Spurgeon Road remains largely the same but the Beulah Hill facades have been significantly set back to accommodate the retention of the existing TPO Copper Beech tree (T2);
- Scale – the heights of the blocks was revised during the application process, this was driven mainly to ensure the building layout didn't affect protected trees, leading to layout changes and revisions to massing.
- Car Parking - 17 secured and covered car spaces are proposed; and
- Landscaping – 174sqm ground floor communal amenity space is proposed, and this allows an increase in the landscaped area fronting Beulah Hill to retain the existing TPO Copper Beech tree.

3.3 The following table provides a comparison between the 2 previously refused schemes and current proposal:

	Refused Scheme 2014	Refused Scheme 2015	Current Scheme
No of Units	62	38	33
No of Car Parking Spaces	61 (no disabled parking proposed & no electric vehicle charging points)	39 (including disabled) deemed excessive, manoeuvring space substandard & no vehicle electric charging points.	17 (including 4 disabled) & electric vehicle charging points
Car Parking Ratio	1.0	1.0	0.5
No. of disabled parking spaces	0	5	4 (& 2 visitor)
No. of cycle spaces	Lack of detail & none for affordable units	1 space per unit & lack of detail	60
Vehicular Access	Access off Beulah Hill & Spurgeon Road	Two accesses off Beulah Hill	Southeast of site from Spurgeon Road
General Design	<ul style="list-style-type: none"> • Arch shape building footprint (wall of development); • Overly dominant appearance & out of keeping with context; • Visually imposing & intrusion onto properties at Spurgeon Road & Menlo Gardens; • Need for simplification of elevations; and • Too many materials proposed/ visually chaotic. 	<ul style="list-style-type: none"> • Three Buildings – 4-6 storeys; • Lack of design cohesion; • Boundary treatment poorly defined; • Block C unacceptable height & imposing on No 72 Spurgeon Road; • Site Frontage dominated by car parking & hard surfacing; and • No sense of arrival to development. 	<ul style="list-style-type: none"> • Simplification of elevational treatment & materials used; • Balconies creating activation of street frontage onto Sturgeon Road; • Reduction of massing at upper storeys; • Reduction in height of Block C down to 2 storeys to relate positively to No 72 Spurgeon Road; • Retention of trees, vegetation & soft landscaping to front of site; and • Pedestrian entranceway between Blocks A & B creates sense of arrival.

Site and Surroundings

- 3.4 The site (which is 0.19 hectares in area) is located on the southern side of Beulah Hill, on the corner adjacent to the junction with Spurgeon Road (on the north-west side of Spurgeon Road).
- 3.5 Beulah Hill (the A215) is a London Distributor Road and Spurgeon Road is a Local Distributor Road. To the west of the site is the Beulah Hill Conservation Area and the Harris Academy Upper Norwood lies to the south of the site and is designated as Educational Open Space.
- 3.6 To the immediate south lies 72 Spurgeon Road, which is a bungalow, but also has a basement level. To the immediate north-west of the site is a 6 storey block of flats, which has two additional basement levels to the rear. To the west are two storey dwellings in Menlo Gardens. These properties are located at a much lower level than the application site. To the south-west is a block of flats on the corner of Beulah Hill and Spurgeon Road, which is 5 storeys in height on the Beulah Hill frontage, but steps down to 2 storeys at the rear. On the opposite side of Beulah Hill are a mix of housing types, with 2-3 storey houses and flats. Number 54 Beulah Hill (opposite) is a 3 storey building with rooms in the roof that has been converted to flats and is Grade II Listed. Properties in Spurgeon Road are generally 2 storeys in height.
- 3.7 The site is occupied by 2 a 2 storey houses, it is noted that number 51 also has a basement. These properties are set in large plots. There are various outbuildings in the rear gardens of these properties.
- 3.8 There are significant land level changes, both within the site and in the surrounding area. The land level falls away sharply to the south of Beulah Hill and also falls to the west. Therefore, the 2 storey properties in Menlo Gardens are at a significantly lower level, with the roofs of these properties at a level below that of Beulah Hill.
- 3.9 There are a number of prominent trees along the boundary with Spurgeon Road and within the existing front gardens of the existing properties fronting Beulah Hill. An Oak tree (T1) and Copper Beech tree (T2) are protected by Tree Preservation Order 42, 2014.

Planning History

- 3.10 The following planning decisions are relevant to the application:

Application Site

- 15/03518/P - Planning permission was refused on 21st September 2015 for the demolition of two existing dwellings; and construction of three buildings up to 6 storeys with basement parking comprising a total of 38 flats; formation of vehicular access and provision of associated car parking.

The Application was refused for similar reasons to those set out under the 2014 refused planning application below.

The current application is materially different from the appeal scheme, and as such has been the subject of a separate planning assessment, in addition to a consideration as to whether the scheme overcomes previous reasons for refusal.

- 14/03518/P – Planning permission was refused on 19th December 2014 for the demolition of two existing dwellings; erection of six storey building with basement comprising 62 flats; formation vehicular access and provision of 61 car parking spaces. The application was refused for the following reasons:
 1. The proposal would result in overdevelopment of the site and would therefore be out of keeping with the character of the area and detrimental to the appearance of the street scene, by way of the building's density, scale, bulk, height and massing;
 2. The development would include an insufficient level of provision for affordable housing and no viability statement was submitted to justify why a greater provision would not be viable;
 3. The development would be detrimental to the visual amenity of the street scene by way of its scale, height, massing, design and use of materials;
 4. The development would be detrimental to the amenities of the occupiers of the adjoining property by reason of its size and siting, resulting in overbearing impact, loss of light, overlooking and loss of privacy, and visual intrusion;
 5. The development would result in a poor quality of accommodation for future occupiers, by reason of high proportion of single aspect flats, unsatisfactory amenity space and an insufficient number of wheelchair accessible/ easily adaptable dwellings;
 6. The development would create hazard to pedestrians and vehicular traffic on the existing highway due to inadequate visibility splays and location of an access in close proximity to the junction of Beulah Hill and Spurgeon Road;
 7. Inadequate provision of information demonstrating that the development would not impact negatively on traffic generation on the surrounding highway network and does not promote sustainable transport;
 8. Development likely to give rise to a worsening of on street parking problems and would reduce the flow and safety of traffic on adjoining highways;
 9. Development would result in the loss of valued trees along the boundary of Spurgeon Road and in the front gardens of 49-51 Beulah hill;
 10. Development fails to demonstrate that future occupiers of the site would not be adversely affected by noise and disturbance from traffic along Beulah Hill as no noise survey was submitted in support of the planning application;
 11. No demonstration of the capability to minimise CO2 emissions in accordance with the energy hierarchy set out by the Council and no demonstration of the development achieving a 40% improvement on the 2010 Building Regulations and absence of a submitted energy statement and details of sustainable design standards.

A planning appeal was subsequently lodged (Ref: APP/L5240/W/15/3038264) which was dismissed in October 2015, with the Inspector citing the following main reasons for dismissing the appeal:

- The impact on the character and appearance of the area;
- The proposal does not make adequate provision for affordable housing;
- The impact on the living conditions of neighbouring residents and of future occupants of the proposed flats;
- The impact on highway safety, sustainable transport and the adequacy of the parking provision; and
- Whether the proposal adopts sustainable design standards.

4 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- 4.1 There is no objection in principle to the proposal. A residential development is appropriate given the existing use of the site as residential accommodation, the character of the surrounding area and the significant housing demand within the Borough.
- 4.2 It is considered that the development would contribute positively to the surrounding townscape and its design is visually pleasant, well thought through and the materials and details of high quality. The proposal would sit comfortably with neighbouring buildings in Beulah Hill and Spurgeon Road and within the streetscene and would be in accordance with design, conservation and heritage policies.
- 4.3 The proposed housing density is above that outlined as normally acceptable in the London Plan. However, it is noted that the density matrix should not be applied with rigidity. Given the context of this site, the higher density is appropriate.
- 4.4 The proposal would provide an appropriate mix of London Plan complaint units (5 x 1-bedroom; 17 x 2-bedroom; 9 x 3-bedroom; and 2 x 4-bedroom) to meet a variety of demands across the Borough in accordance with Policy 3.8 of the London Plan.
- 4.5 All of the proposed units would meet the National technical housing standards in terms of overall size and bedroom size. All of the units would also meet the requirements outlined in the Housing SPG in relation to amenity space quantum and minimum dimensions and would provide a good standard of accommodation.
- 4.6 The proposal would provide 7 affordable units all as shared ownership units (21% of total units) comprising 1 x 1-bedroom and 6 x 2-bedrooms units. This offer has been subject to extensive viability testing and is considered to be the maximum reasonable level of affordable housing, which still allows the scheme to be financial viable and deliverable. This is less than the Council's policy aim, which is for 50% of units to be affordable. The applicant has agreed to undertake early and late stage affordable housing review being included in the legal agreement (so that increased levels of affordable housing could be secured if the development economics of the scheme improve). Given this and the constraints of the site, the proposed tenure split is considered acceptable.
- 4.7 The proposed development would meet all relevant residential space standards and makes adequate provision for private and communal amenity space and play space. Adequate levels of daylight would also be provided within the flats for future residents.
- 4.8 Given the proposed design and positioning of the proposed development and the separation distances between proposed residential units and with neighbouring residential properties in Beulah Hill and Spurgeon Road, the proposal would not

result in any undue loss of outlook or privacy to the existing occupiers of neighbouring residential properties and to future occupiers of the development.

- 4.9 With suitable conditions (which are recommended) to secure mitigation, the development is considered acceptable with regards to its environmental impacts, specifically in relation to internal noise conditions, air quality impacts and flood risk.
- 4.10 The highways impacts of the development would be acceptable. 17 parking spaces would be provided at basement and lower ground floor levels including 4 disabled spaces to serve wheelchair users who may occupy the development and 60 cycle parking spaces in accordance with the London Plan's cycle standards. The Council's Highways advisor has raised no objection to the proposals.
- 4.11 The building would have a sustainable construction, meeting all of the relevant sustainability standards.

5 CONSULTATION RESPONSES

- 5.1 The views of the Planning Service are expressed in the 'MATERIAL PLANNING CONSIDERATIONS' section below.
- 5.2 The following organisations were consulted regarding the application:

Thames Water

- 5.3 Thames water have confirmed no objection to the proposal subject to a condition requiring details of any piling being attached to any planning permission granted together with informatives relating to surface water drainage, groundwater discharge, water pressure and advising of the presence of a main crossing the site which may need to be diverted at the developer's cost.

6 LOCAL REPRESENTATION

- 6.1 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: 20 Objecting: 20 Supporting: 00

No of petitions received: 00

- 6.2 The following Councillor and Member of Parliament made representations were received:

Councillor Scott (Chair of the Planning Committee) has referred the application to Committee to allow further consideration and given the following issues:

- Potential to meet housing need through the provision of new homes, responding to the governments National Planning Policy Framework and the Mayor for London's housing targets;
- Massing and design of the proposed building in relation to the character of the area;
- Parking provision;
- Affordable housing provision;

- Mix of residential units; and
- Extent to which the previous reasons for refusal have been addressed.

6.3 The 20 representations received raised the following concerns:

- Overdevelopment of the site;
- Out of keeping with the existing density and character of the area;
- Visually overbearing and intrusive design;
- Detrimental impact on trees;
- Loss of light;
- Noise and disturbance;
- Overlooking and loss of privacy;
- Increase in traffic;
- Lack of car parking provision; and
- Prejudicial to pedestrian and highway safety.

6.4 The above concerns that are material to the determination of the application, are addressed in substance in the 'MATERIAL PLANNING CONSIDERATIONS' section of this report, or by way of planning condition or planning obligation.

7 RELEVANT PLANNING POLICIES AND GUIDANCE

7.1 In determining any planning application, the Council is required to have regard to the provisions of its Development Plan so far as is material to the application and to any other material considerations and the determination shall be made in accordance with the plan unless material considerations indicate otherwise. The Council's adopted Development Plan consists of the Consolidated London Plan 2015, the Croydon Local Plan: Strategic Policies 2013 (CLP1), the Croydon Replacement Unitary Development Plan 2006 Saved Policies 2013 (UDP) and the South London Waste Plan 2012.

7.2 Government Guidance is contained in the National Planning Policy Framework (NPPF), issued in March 2012. 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:

- Promoting sustainable transport;
- Delivering a wide choice of high quality homes; and
- Requiring good design.

7.3 The main policy considerations raised by the application that the Committee are required to consider are:

7.4 London Plan 2017:

- 3.3 Increasing housing supply
- 3.4 Optimising housing potential
- 3.5 Quality and design of housing developments
- 3.6 Children and young people's play and informal recreation facilities
- 3.7 Large residential developments

- 3.8 Housing choice
- 3.9 Mixed and balanced communities
- 3.10 Definition of affordable housing
- 3.12 Negotiating affordable housing
- 3.13 Affordable Housing thresholds
- 4.10 New and emerging economic sectors
- 5.2 Minimising carbon dioxide emissions
- 5.3 Sustainable design and construction
- 5.7 Renewable energy
- 5.9 Overheating and cooling
- 5.10 Urban greening
- 5.11 Green roofs and development site environs
- 5.13 Sustainable drainage
- 5.15 Water use and supplies
- 6.3 Effects of development on transport capacity
- 6.9 Cycling
- 6.10 Walking
- 6.11 Smoothing traffic flow and tackling congestion
- 6.12 Road Network Capacity
- 6.13 Parking
- 7.1 Lifetime neighbourhoods
- 7.2 An inclusive environment
- 7.3 Designing out crime
- 7.4 Local character
- 7.5 Public realm
- 7.6 Architecture
- 7.7 Tall and large buildings
- 7.14 Improving Air Quality
- 7.15 Reducing and managing noise
- 7.21 Trees and Woodland
- 8.2 Planning obligations
- 8.3 Community infrastructure levy

7.5 Croydon Local Plan: Strategic Policies 2013 (CLP1):

- SP1.1 Sustainable Development
- SP2.1 Homes
- SP2.2 Quantities and Locations
- SP2.3 Affordable Homes - Tenure
- SP2.4 Affordable Homes - Quantum
- SP2.5 Mix of homes by size
- SP2.6 Quality and Standard
- SP4.1-4.3 Urban Design and Local Character
- SP4.7-4.10 Public Realm
- SP4.13 Character, Conservation and Heritage
- SP6.1 Environment and Climate Change
- SP6.2 Energy and CO2 Reduction
- SP6.3 Sustainable Design and Construction
- SP7.4 Enhance biodiversity
- SP8.3-8.4 Development and Accessibility

- SP8.6 Sustainable Travel Choice
- SP8.7(h) Cycle Parking
- SP8.13 Motor Vehicle Transportation
- SP8.15-16 Parking

7.6 Croydon Replacement Unitary Development Plan 2006 Saved Policies 2013 (UDP):

- UD1 High Quality and Sustainable Design
- UD2 Layout and siting of new development
- UD3 Scale and Design of new buildings
- UD6 Safety and Security and New Development
- UD7 New Development and Access for All
- UD8 Protecting residential amenity
- UD13 Parking Design and Layout
- UD14 Landscaping
- UD15 Refuse and Recycling Storage
- EP1 – EP3 Pollution
- EP5 - EP7 Water – Flooding, Drainage and Conservation
- T2 Traffic Generation from Development
- T4 Cycling
- T8 Parking
- H2 Supply of new housing
- H3 Housing Sites
- H4 Dwelling mix on large sites

7.7 Emerging Policies CLP1.1

- SP2.2- Quantities and locations
- SP2.3-2.6- Affordable Homes
- SP2.8- Quality and standards
- SP3.14- Employment and training
- SP4.13- Character, conservation and heritage
- SP6.3- Sustainable design and construction
- SP6.4- Flooding, urban blue corridors and water management
- SP8.9- Sustainable travel choice

7.8 Emerging Policies CLP2

- DM1- Housing choice for sustainable communities
- DM11- Design and character
- DM11.1- Quality and character
- DM11.2- Quality of public and private spaces
- DM11.4- Residential amenity space
- DM11.5- Communal residential amenity space
- DM11.6- Protecting residential amenity
- DM11.7- Design quality
- DM11.9- Landscaping
- DM11.10- Architectural lighting
- DM14- Refuse and recycling
- DM19.1- Character, appearance and setting of heritage assets
- DM19.9- Archaeology

- DM24- Development and construction
- DM25- Land contamination
- DM26.2- Flood resilience
- DM26.3- Sustainable drainage systems
- DM28- Biodiversity
- DM29- Trees
- DM30- Promoting sustainable travel and reducing congestion
- DM31- Car and cycle parking in new development

7.9 The Partial Review of Croydon Local Plan: Strategic Policies (CLP1.1) and the Croydon Local Plan: Detailed Policies and Proposals (CLP2) was approved by Full Council on 5th December 2016 and was submitted to the Planning Inspectorate on behalf of the Secretary of State on 3rd February 2017. The examination in public took place between 16th May and 31st May 2017. Main modifications have been received from the Planning Inspector and the Council consulted on these modifications during the period 29th August – 10th October 2017.

7.10 According to paragraph 216 of the NPPF, relevant policies in emerging plans may be accorded weight following publication, but with the weight to be given to them is dependent on, among other matters, their stage of preparation. Now that the main modifications to CLP1.1 and CLP2 have been published for consultation, there are certain policies contained within these plans that are not subject to any modifications and significant weight may be afforded to them on the basis that they will be unchanged when CLP1.1 and CLP2 are adopted.

7.11 There is relevant Supplementary Planning Guidance as follows:

- London Housing SPG, March 2016
- Homes for Londoners: Affordable Housing and Viability SPG, August 2017
- National Technical Housing Standards, 2015
- National Planning Practice Guidance, 2014
- Play and Informal Recreation SPG
- Accessible London: Achieving an Inclusive Environment SPG
- Sustainable Design and Construction SPG
- SPG Note 3 – Designing for Community Safety
- SPG Note 10 – Designing for Accessibility
- SPG Note 12 – Landscape Design
- SPG Note 15 – Renewable Energy
- SPG Note 17 – Sustainable Surface Water Drainage
- SPG Note 18 – Sustainable Water Usage

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. Density, housing unit mix and affordable housing
3. Heritage, townscape and visual impact
4. Impact on adjoining occupiers
5. Quality of living environment provided for future occupiers

6. Environmental impacts
7. Transportation, access and parking
8. Sustainability
9. Other planning Matters

Principle of development

- 8.2 At the heart of the National Planning Framework 2012 (NPPF) is a presumption in favour of sustainable development which meets social, economic and environmental needs.
- 8.3 Croydon Local Plan Strategic Policies (CLP1) Policy SP1.3 states that the Council will seek to encourage growth and sustainable development. The NPPF also attaches great importance to significantly boosting the supply of new housing. Policy 3.3 of the London Plan further seeks to increase housing supply across the Capital, with minimum housing targets being set out in Table 3.1. For Croydon, the London Plan sets a minimum target of 1,435 residential units per year in the borough over the period of 2015-2025.
- 8.4 The scheme would provide a total of 33 new units on a site, currently occupied by 2 dwelling houses. In principle, no objection was raised by the Inspector in the 2015 appeal decision (ref. 14/03518/P) to the replacement of the existing houses with a flatted development. The core principles of the NPPF encourage the reuse of previously developed land. In light of the priority given to the delivery of a significant number of new dwellings the principle of the redevelopment of the site for a residential development is supported.

Density, housing unit mix and affordable housing

Density

- 8.5 Policy 3.4 of the London Plan states that taking into account local context and character, the design principles in Chapter 7 and public transport capacity, development should optimise housing output within the relevant density range shown in Table 3.2. Based on the public transport accessibility level (PTAL 2) and the site's suburban characteristics, the London Plan density matrix suggests a residential density of between 200 and 450 habitable rooms per hectare.
- 8.6 The residential density of the proposal would be 585 habitable rooms per hectare which exceeds the upper limit of the indicative range within the London Plan for a central area. However it is noted that the supporting text to Policy 3.4 of the London Plan confirms that the density matrix should not be applied mechanistically.
- 8.7 The Mayor's Housing SPG, at paragraph 1.3.12, further states that the density ranges should be "*used as a guide and not an absolute rule, so as to also take proper account of other objectives*". It does not preclude developments with a density above the suggested ranges, but requires that they "*must be tested rigorously*" (para.1.3.14). This will include an examination of factors relating to different aspect of "*liveability*" of a proposal (dwelling mix, design and quality of accommodation), access to services, impact on neighbours, management of communal areas and a scheme's contribution to '*place shaping*'. The impact of massing, scale and character in relation to nearby uses will be particularly important.

- 8.8 The SPG also considers the opportunities and constraints with regards to density on small sites (para.1.3.39). Responding to existing streetscape, massing and design of the surrounding built environment should be given special attention – where existing density is high, for example, higher density can be justified. Paragraph 1.3.40 notes that small sites require little land for internal infrastructure, and as such, it is appropriate for density to reflect this. These factors are all relevant to the development of the application site.
- 8.9 It is considered that the proposed residential development has been designed to deliver new homes within buildings that respond to their local context, taking into account both the physical constraints of the site and its relationship with neighbouring properties and the nearby townscape.
- 8.10 The proposed development exceeds the London density range. This is, however, justified by the quality of the accommodation, the design and its response to context, and the rigour the applicant has applied to assessing the acceptability of the scheme within these parameters. It delivers on London Plan policy by optimising additional housing on an underutilised brownfield site in a highly accessible location. The density of the development is therefore considered to be acceptable.

Housing Unit Mix

- 8.11 CLP1 Policy SP2.5 seeks to secure the provision of family housing and states the Council’s aspiration for 60% of all new homes outside of the Croydon Opportunity Area having three or more bedrooms. It is important to highlight that emerging policy differs from the existing policy, whereby 2 bed (4 person) units are also considered to be family accommodation.
- 8.12 The unit mix of the development is reproduced below for ease of reference:

	1 bed	2 bed	3 bed	4 bed	Total
Market Rent	4 (12%)	11 (33%)	9 (27 %)	2 (7%)	26 (79%)
Shared Ownership	1 (3%)	6 (18%)	0 (0%)	0 (0%)	7 (21%)
Total	5 (15%)	17 (51%)	9 (27%)	2 (7%)	33

- 8.13 The proposal allows for 34% three/four bedroom units and 51% two bedroom units. With reference to emerging Local Plan Policy document CLP2 (see Section 5) two bedroom four person units (as are proposed) may be acceptable in lieu of larger family homes of three beds or more. Therefore when calculating the family housing provision on this basis, the proposed development will exceed the above target within CLP1 and the proposed proportion of family housing is considered acceptable.
- 8.14 On balance, it is considered that the proposal would provide an appropriate mix of units (5 x 1-bedroom; 17 x 2-bedroom; 9 x 3-bedroom; and 2 x 4-bedroom) to meet a variety of demands across the Borough in accordance with Policy 3.8 of the London Plan.

Affordable Housing – Regional Policy Context

- 8.15 Policies 3.8 to 3.13 of the London Plan relate to affordable housing. Policy 3.11 states that the Mayor will, and boroughs and other relevant agencies and partners

should, seek to maximise affordable housing provision and ensure an average of at least 17,000 more affordable homes per year in London over the term of this Plan. In order to give impetus to a strong and diverse intermediate housing sector, 60% of the affordable housing provision should be for social and affordable rent and 40% for intermediate rent or sale. Priority should be accorded to provision of affordable family housing. Paragraph 173 of the NPPF imposes an obligation on Councils to ensure viability when setting requirements for affordable housing.

- 8.16 Policy 3.12 of the London Plan further seeks the maximum reasonable amount of affordable housing when negotiating on individual housing schemes but states that the objective is to encourage rather than restrain residential development.

Affordable Housing – Existing Local Policy Context

- 8.17 Policy SP2.4 of CLP1 seeks up to 50% affordable housing provision on sites such as this. Table 4.1 provides flexibility, requiring a minimum level of affordable housing on all sites. Following the end of the first three years of the plan, the minimum level was reviewed (from its previous minimum requirement of 15%) and this is currently set at 50%. The affordable housing should be provided at a ratio of 60:40 between affordable rented homes and intermediate housing. This policy is being reviewed through the partial review of CLP1 (CLP1.1). The Local Plan Inspector has introduced main modifications to the policy, but these do not alter the overall approach of the policy.

Affordable Housing – Emerging Local Policy Context

- 8.18 Taking account of the sites location, emerging policy SP2.4 of CLP1.1 seeks a minimum on site provision of 15% of units being provided as affordable housing, along with a review mechanism (which seeks to secure additional affordable housing to make up for any shortfall once actual costs and revenues are known)
- 8.19 Emerging policy retains the 60:40 (affordable rent and shared ownership) ratio but expands the types of intermediate products to include starter homes and intermediate rent products as well as low costs shared ownership homes.
- 8.20 The Applicant's viability report has been independently assessed by the Council's viability consultant, who have confirmed the accuracy of the applicant's financial viability assessment. In this case the provision of the CLP1 target of 50% affordable housing is not achievable. The developer is proposing to achieve affordable housing on site through delivering 21% by unit numbers within Block A. This represents 7 shared ownership units comprising 1 x 1-bedroom and 6 x 2-bedrooms units.
- 8.21 The affordable housing offer doesn't provide for affordable rented housing, and as such the Applicant was required to justify the position. The Applicant provided evidence from a Registered Housing Provider (Moat), which states that in this case, given the limited number of affordable units (7) able to be provided (as tested through the financial viability assessment) it wouldn't be viable for the RP to manage 2 different tenures in the building.
- 8.22 As the amount of affordable housing proposed is less than the minimum amount of 50% affordable housing required by planning policy, it is proposed that review mechanisms will be sought through the S106 Agreement. As the residential component of the scheme is likely to be delivered over a number of years review

mechanisms will be required at appropriate milestones. The detail of this will be finalised as part of the S106 Agreement, details of which are still being negotiated. The maximum cap for the affordable housing review mechanism would be 50% quantum of affordable housing provision to comply with current policy. On balance, the affordable housing offer is considered to be appropriate, subject to the review mechanisms as described above.

- 8.23 Having regard to comments from the independent assessment of viability, the planning history and other material considerations, it is considered that the proposal (with regards to affordable housing) satisfactorily accords with the objectives of the London Plan, emerging London Plan Housing SPG, CLP1, UDP Saved Policies 2013 and national policies.

Heritage, Townscape and visual impact

- 8.24 Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 places a statutory obligation on Local Planning Authorities, as decision maker, to have special regard, equivalent to considerable importance and weight, to the desirability of preserving a listed building and its setting, or any features of special architectural or historic interest which it possesses. Preservation in this context means causing no harm to the special interest of heritage assets. Section 72 requires that special attention be paid to the desirability of preserving or enhancing the character or appearance of a conservation area.
- 8.25 The NPPF also refers to heritage assets in paragraph 133 which states that where a development will lead to substantial harm to a heritage asset it should be refused unless it can be demonstrated that the substantial harm is necessary to achieve substantial public benefits which outweigh that harm or loss. Paragraph 134 states that a less than substantial harm to the significance of heritage assets should be weighed against the public benefits of the proposal.
- 8.26 Policy SP1.2 of CLP1 states that *'Development proposals should respond to and enhance local character, the heritage assets and identity of the Places of Croydon'*. Similarly, emerging Policy DM19.1 of CLP2 requires development proposals to *'preserve and enhance the character, appearance and setting of heritage assets within the borough'*. Furthermore Policy DM19.2 states that development proposals must demonstrate that attention has been paid to 'scale, height, massing' and that the proposal is of high quality design which integrates and makes a positive contribution to the historic setting of the heritage asset.
- 8.27 The NPPF further attaches great importance to the design of the built environment. Paragraph 17 gives 17 core planning principles. One of these principles is *'always seeks to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings'*. Paragraph 56 states that *'The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people'*.
- 8.28 Paragraph 58 identifies 6 points that decisions should aim to ensure in all development. These include, adding to the overall quality of the area, establishing a strong sense of place, responding to local character and being visually attractive. Paragraph 59 states that local planning authorities should consider using design codes where they could help deliver high quality outcomes. Paragraph 61 highlights

the importance of the visual appearance and architecture but also addresses the importance of connections between people and places and the natural, built and historic environment.

- 8.29 Paragraph 63 places weight on outstanding or innovative design. Paragraph 69 seeks to promote safe and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas.
- 8.30 Policies 7.4 and 7.6 of the London Plan state that new development should be complementary to the established local character and that architecture should make a positive contribution and have a design which is appropriate to its context. CLP1 Policy SP4.1 states that developments should be of a high quality which respects and enhances local character. Policies UD2 and UD3 of the Croydon Replacement Unitary Development Plan (The Croydon Plan) 2006 Saved Policies require development to be of a high quality and visually appropriate design which respects the existing development pattern.
- 8.31 The application site is located in a predominantly residential area of Upper Norwood, fronting the south western side of Beulah Hill at its junction with Spurgeon Road. The majority of dwellings in the locality are of 2/3 storey height, albeit that there is a 6 storey block of flats adjoining the site to the north west (1-73 (odd) Menlo Gardens) and a 5 storey block of flats on the south eastern side of Spurgeon Road. The site currently contains 2 detached houses facing, and at a slightly lower level than, Beulah Hill. The rear of the site falls very steeply down to the south western boundary, beyond which is a detached bungalow, No.72 Spurgeon Road.
- 8.32 The proposed scheme reflects a contemporary style and comprises 3 building blocks. Block A, the tallest of the group (part 6 and part 7 storeys above street level) is positioned at the northwest of the site adjacent to Menlo Gardens, which is a 6-storey tall (above street level) flatted block with an additional set back storey to the rear. The proposed massing then gradually climbs down to Block B (part 4, part 5, part 6 storeys above street level) on the north-eastern corner, respecting the neighbouring Tropicana Building (No.28 Spurgeon Road) in terms of its height and its stepped form as it falls away along Spurgeon Road. Taking into account the change in street levels and the housing typologies (flatted blocks to semi-detached houses), the proposed development relates satisfactorily to lower scale neighbouring properties with a modest 2-storey (above street level) townhouses form of Block C.
- 8.33 The development is sufficiently set back from Beulah Hill and Spurgeon Road to ensure the building line relates sensibly to surrounding development, and to prevent an overbearing impact upon the streetscene. The proposed height is comparable to the surrounding properties which ranges up to six storeys and is further justified by the location at the corner Beulah Hill and Spurgeon Road from which a significant drop in level starts. The change in scale between the building blocks and active frontage approach, with features such as front entrance doors, gates & landscaping, works well together to complete this one of many key corner sites along Beulah Hill.
- 8.34 Careful consideration has also been given to the design and massing of the residential town houses (Block C) on the southern portion of the application site. The height of the massing has been lowered from the previously refused (2015) planning application and now sits at two storeys (lower ground to rear) to create a positive relationship with number 72 Spurgeon Road opposite. The distribution of height and

massing throughout the three blocks is well balanced and the separation between the two main apartment blocks and the terraced housing on Spurgeon Road successful.

- 8.35 The application Site is located in proximity to Statutory Listed (Grade II) building known as St Valery (54 Beulah Hill). The proposed development has been designed with careful consideration also given to this heritage asset by way of simplification of proposed materials and elevational treatment to contribute positively to the surrounding townscape. No concerns were raised in relation to previous proposals in terms of impact on the heritage asset. Taking account of the scale of the development proposed, the orientation of the proposal in relation to views to and from the heritage asset, it is not considered that the proposal would cause harm to the setting of listed building.
- 8.36 Overall, the development would contribute positively to the surrounding townscape when comparing the design to the previous refused schemes. The design is visually pleasant, well thought through and the materials and details of high quality. The facades are well articulated and the fenestration rhythm is elegant and clear.
- 8.37 The elevational treatment and materials for the proposed development have been chosen to ensure simplicity throughout the design of the development and to be in keeping with the local context. The fenestration is well proportioned, whilst the positioning of the balconies creates an active frontage. The regularity of the elevations fronting Beulah Hill accentuates the verticality and uniform nature of the design, creating a taller and more elegant appearance whilst the rear of the development drops down to relate sympathetically to neighbouring buildings.
- 8.38 The proposed re-design of the original proposal was driven by the need to preserve the TPO protected Copper Beech tree, and this has resulted in a more interesting frontage articulation and a more inviting and generous courtyard and entrance. Retaining the Oak and the Copper Beech provides a high quality landscape along Beulah Hill enhancing the green and leafy character of the area while providing significant visually improvement.
- 8.39 Overall, the proposal would sit comfortably with neighbouring buildings and within the streetscene and would be in accordance with the design, conservation and heritage policies set out above.

Impact on adjoining occupiers

- 8.40 One of the core planning principles (paragraph 17) in the NPPF is that decisions should “*always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings*”. London Plan Policy 7.1 states that in their neighbourhoods, people should have a good quality environment.
- 8.41 Croydon Local Plan: Strategic Policies SP4.1 and SP4.2 seek to respect and enhance character to create sustainable communities and enhance social cohesion and well-being. Croydon Plan Policy UD8 states that the residential amenity of adjoining occupiers should be protected. The compliance of the proposal with these policies is now considered below in relation to each impact.

Sunlight and daylight – policy context

- 8.42 Emerging Policy DM11.6 also requires new development proposals to protect or improve the amenity of the occupiers of adjoining residential and commercial

buildings, to ensure that “*the amenity of the occupiers of adjoining buildings are protected*” (part a) and that “*they do not result in direct overlooking at close range or habitable rooms*” (part b). Criteria d and e confirm the developments should d) “*Provide adequate sunlight and daylight to potential future occupants*”; and e) “*They do not result in significant loss of existing sunlight or daylight levels of adjoining occupiers.*”

8.43 The nearest neighbouring residential properties to the application site are Nos. 54 (a five storey residential property) and 63 Beulah Hill (a two storey detached house) located to the north east on the opposite side of the road; No. 28 Spurgeon Road (a five storey apartment block known as Tropicana) to the south east; No.72 Spurgeon Road (a two storey detached house) to the south west and Nos. 1-73 (a seven storey apartment block), 83 and 85 (a three storey apartment block) Menlo Gardens to the north west and south west of the application site.

8.44 The current application is accompanied by an independent Daylight/Sunlight report produced by XCO2 which provides an assessment of the potential impact of the development on sunlight, daylight and overshadowing to neighbouring residential properties based on the approach set out in the Building Research Establishment’s (BRE) ‘Site Layout Planning for Daylight and Sunlight: A Good Practice Guide’.

8.45 Daylight has been assessed in terms of Vertical Sky Component (VSC) and sunlight has been assessed in terms of Annual Probable Sunlight Hours (APSH) and overshadowing has been assessed against the above BRE guidelines. The BRE Guidelines provide numerical guidelines, but these are not mandatory should not be seen as an instrument of planning policy, these (numerical guidelines) are to be interpreted flexibly since natural lighting is only one of many factors in site layout design.

8.46 Daylight: the BRE Guidelines stipulate that there should be no real noticeable loss of daylight provided that either:

The Vertical Sky Component (VSC) as measured at the centre point of a window is greater than 27%; or the VSC is not reduced by greater than 20% of its original value. (Skylight); or

The daylight distribution, as measured by the No Sky Line (NSL) test where the percentage of floor area receiving light is measured, is not reduced by greater than 20% of its original value.

8.47 It should be noted that the London Plan guidance is that in London accepting VSC reductions exceeding 20% is acceptable in view of its urban context.

8.48 Sunlight: the BRE Guidelines confirm that windows that do not enjoy an orientation within 90 degrees of due south do not warrant assessment for sunlight losses. For those windows that do warrant assessment it is considered that there would be no real noticeable loss of sunlight where:

In 1 year the centre point of the assessed window receives more than 1 quarter (25%) of annual probable sunlight hours (APSH), including at least 5% of Annual Winter Probable Sunlight Hours (WSPH) between 21 Sept and 21 March – being winter; and less than 0.8 of its former hours during either period; and In cases where these requirements are breached there will still be no real noticeable loss of sunlight

where the reduction in sunlight received over the whole year is no greater than 4% of annual probable sunlight hours.

Daylight – assessment

- 8.49 A total of 72 windows from buildings surrounding the site (31 windows at No.54 Beulah Hill; 4 windows at No.63 Beulah Hill; 19 windows at Nos.1-73 Menlo Gardens; 9 windows at Nos.83 and 85 Menlo Gardens; 7 windows at No. 28 Spurgeon Road; and 2 windows from No. 72 Spurgeon Road) were highlighted as being in close proximity to, and facing the proposed development. Daylighting levels for potentially affected windows of surrounding developments by the proposed development were found to be acceptable.
- 8.50 In summary,
- 46 out of 72 windows passed the 25-degree line test;
 - 13 of the remaining 26 windows achieved VSCs greater than 27%; and
 - 7 windows achieved relative VSCs over 80% of their former values.
- 8.51 The remaining 6 windows (3 windows at Nos.1-73 Menlo Gardens; 2 windows at Nos.83 and 85 Menlo Gardens; and 1 window from No. 72 Spurgeon Road) fall marginally below the BRE target for relative VSC of 80% the former value (but all retain at least 70% of their original value, which is a minor transgression). In addition, 3 of the 6 windows are attached to the seven storey residential block at Menlo Gardens which is of a similar scale to the adjacent part of the proposed development and therefore the GLA's guidance on accepting VSC's exceeding 20% is considered pertinent in their case.
- 8.52 Overall, the development is not anticipated to have any notable impact on the daylight received by neighbouring properties.

Sunlight - assessment

- 8.53 A total of 54 windows from buildings surrounding the site (belonging to No.54 Beulah Hill; No.63 Beulah Hill; and Nos. 1-73 Menlo Gardens) were assessed for sunlight access. The analysis indicated that 35 windows passed the 25-degree line test. All of the remaining 19 windows satisfied the BRE criteria for annual probable sunlight hours (APSH) and winter probable sunlight hours (WPSH).
- 8.54 Therefore, the proposed development is not considered to have any notable impact on sunlight access to windows of surrounding developments.

Outlook and privacy

- 8.55 The refused planning applications and appeal refusal decision highlighted the overbearing relationship of those earlier proposals with No.72 Spurgeon Road and concern with overlooking. The height of Block C nearest to the rear boundary with this neighbouring property has been lowered so that it now sits at two storeys (lower ground to rear). No habitable rooms windows facing the northern flank of No.72.
- 8.56 Furthermore, the proposal retains the separation from the boundary by provision of a vehicular access ramp and landscaping strip. It is therefore considered that the previous concerns relating to the impact on the neighbouring occupiers of No.72 Spurgeon Road have been adequately addressed.

- 8.57 Concern was also raised in the 2014 refusal and referenced by the Inspector in relation to the overbearing relationship of the proposed development with No.83-89 Menlo Gardens. The development now proposed would be located approximately 15.4 to 16m from Nos. 1-73 Menlo Gardens to the northwest and 15.5 to 15.9m from Nos. 83 and 85 Menlo Gardens to the northwest at its closest point to the rear amenity space of Blocks A and C and in excess of 20m from the nearest habitable window.
- 8.58 Given the proposed design and positioning of the proposed development and the separation distances with neighbouring residential properties in Beulah Hill and Spurgeon Road, the proposal would not result in any undue loss of outlook or privacy to the existing occupiers of neighbouring residential properties.

Quality of living environment provided for future residents

Residential space standards

- 8.59 Policy 3.5 of the London Plan states that new residential units should provide the highest quality internal environments for their future residents and should have minimum floor areas in accordance with the Government's technical housing standards set out in Table 3.3 and recognises that a genuine choice of homes should be provided in terms of both tenure and size. Detailed residential standards are also contained within the Mayor's London Housing SPG.
- 8.60 Policy 3.8 of the London Plan further states that 10% of new residencies within a development should be wheelchair accessible or easily adaptable for residents who are wheelchair users. Provision should also be made for affordable family housing, wheelchair accessible housing and ensure all new housing meets parts M4 (2) and (3) of the Building Regulations. Policy UD8 of the Croydon Plan further states that external amenity space should be provided to serve new residential units at a level which is commensurate with that provided in the surrounding area.
- 8.61 The London Housing SPG provides further details in relation to housing standards, including in relation to the provision of dual aspect units and private amenity space. Housing SPG standard 4.10.1 states that 5m² of private amenity space should be provided for each one bedroom unit, with a further 1m² provided for each additional occupant. Standard 4.10.3 states that the minimum length and depth of areas of private amenity space should be 1.5m and standard states that developments should avoid single aspect units which are north facing, have three or more bedrooms, or are exposed to a particularly poor external noise environment.
- 8.62 All of the proposed units would meet the National technical housing standards in terms of overall size and bedroom size. All of the units would also meet the requirements outlined in the GLA's Housing SPG in relation to amenity space quantum and minimum dimensions and all units would achieve a minimum 2.5 metre floor to ceiling height.
- 8.63 All of the proposed three and four bedroom units have dual aspect and therefore, there are no single aspect units which are north facing. 4 of the units (12% of the total) would be wheelchair adapted or capable of easy adaptation for wheelchair users. The Policy and Housing SPG requirements outlined above are therefore met.

Private/Communal amenity space and child play space provision

- 8.64 Policy DM11 of Croydon's Local Plan: Detailed Policies and Proposals (Main Modifications) confirms support for new development which includes private amenity space that is of high quality design that enhances and respects the local character of the surrounding area.
- 8.65 Policy 3.6 of the London Plan states that housing development proposals should make a provision for play and informal recreation for children and young people. According to Housing SPG standard 1.2.2, the development is required to make appropriate play provisions in accordance with a GLA formula and calculation tool, whereby 10sqm of play space should be provided per child, with under-5 child play space provided on-site as a minimum, in accordance with the London Plan 'Shaping Neighbourhoods: Play & Informal Recreation SPG'.
- 8.66 Amenity space areas including private balconies and rooftop amenity space for the future residents of Blocks A and B and private front and rear gardens for the townhouses (Block C) are proposed. The development proposes a total of 174sqm of communal amenity area at lower ground level which equates to 5sqm per residential unit, in addition to private amenity space including, balconies, terraces and private gardens of which every unit benefits from at least one of these. A soft landscaped area is to be provided on the north east frontage onto Beulah Hill with the portion of Council owned open land being shown with indicative landscaping to illustrate how this area could be designed to complement the wider development. Overall, the provision and quality of private and communal amenity space, including child play space, is considered to be acceptable.

Privacy

- 8.67 Standard 5.1.1 in the GLA's Housing SPG states that habitable rooms should be provided with suitable privacy. 18-21m is indicated as a suitable minimum distance between facing habitable rooms, although the standard notes that "*adhering rigidly to these measures can limit the variety of urban spaces and housing types in the city and can sometimes unnecessarily restrict density.*"
- 8.68 Given the orientation and positioning of the proposed windows within the 3 blocks and the separation distances between these and existing neighbouring residential buildings as set out above, the proposal would not result in any undue overlooking or loss of privacy to the detriment of existing neighbouring and future occupiers of the development.

Daylight and sunlight conditions for future residents

- 8.69 The development should also seek to ensure that adequate sunlight and daylight is provided to individual flats. The internal daylight/sunlight assessment prepared by XC02 confirms that the residential units will comply with BRE guidance in terms of daylight and sunlight amenity for proposed residents and makes the following conclusions.
- 8.70 The assessment was carried out for all 33 dwellings. A total of 111 habitable rooms within these dwellings have been included in the assessment. The results indicated that 110 out of 111 habitable spaces satisfy the recommendations set out by the BRE's "Site Layout Planning for Daylight and Sunlight, A Guide to Good Practice" by PJ Littlefair (2011), which is accepted as good practice by Planning Authorities. All kitchens, living rooms and bedrooms meet the BRE criteria for this room type;

8.71 Overall, the proposed development is therefore considered to provide a good quality of accommodation to the future occupants in terms of daylight.

Environmental Impacts

Air pollution, noise and vibration

- 8.72 Policy 7.14 of the London Plan states that the Mayor will work with strategic partners to ensure that the spatial, climate change, transport and design policies of his plan support the implementation of his Air Quality Strategy to achieve reductions in pollutant emissions and public exposure to pollution. It also states that development should be 'air quality neutral' and not lead to further deterioration of existing poor air quality (such as areas designated as Air Quality Management Areas). The whole of Croydon Borough has been designated as an Air Quality Management Area – AQMA.
- 8.73 Chapter 11 of the NPPF also requires planning policies and decisions to avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development; mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from noise from new development; and to recognise that development will often create some noise. Chapter 13 states that when determining planning applications, local planning authorities should ensure that any unavoidable noise, dust and particle emissions and any blasting vibrations are controlled, mitigated or removed at source.
- 8.74 Policy 7.15 of the London Plan states that development proposals should seek to minimise the existing and potential adverse impacts of noise on, from, within or in the vicinity of development proposals. Croydon Local Plan: Strategic Policies 6.3 requires development to positively contribute to improving air, land, noise and water quality by minimising pollution. Policy EP1 of the UDP Saved Policies 2013 refers to the pollution of water, air or soil or pollution through noise, dust, vibration, light heat or radiation.
- 8.75 The effects on air quality associated with the completed development would result from the significant change of use of the site former commercial use to a predominately residential development. Whilst the submitted Air Quality Impact Assessment indicates that the proposed building would result in negligible air quality impacts, the authority requires that the proposed building should be air quality neutral. The developers would be required to complete the Croydon Development Emission Tool (CDET) which is an Excel based building modelling tool. CDET focuses on quantifying the levels of the air pollutants from homes, commercial buildings and other non-industrial buildings. This could be secured through a condition requiring the submission of a Low Emission Strategy.
- 8.76 Given the location of the development in an area of high human exposure there is a requirement for this development to incorporate a S106 contribution for air quality. As such a S106 air quality contribution is required to ensure air quality benefits are realised.
- 8.77 The Suitability Statement submitted with this application confirms that issues relating to internal and external noise and disturbance are not predicted on site. Noise level from any air handling units, mechanical plant, or other fixed external machinery should not increase the background noise level when measured at the nearest sensitive residential premises. In effect, this means the noise level from any new

units should be at least 10Db below existing background noise levels. This would be controlled by condition.

- 8.78 As a major development, the construction phase would involve very large scale operations and is likely to be elongated. As the potential for significant adverse environmental effects during this phase is large, a Construction Logistics Plan and an Environmental Management Plan should therefore be secured by condition.

Water resources and flood risk

- 8.79 Policy 5.12 states that development proposals must meet flood risk assessment and management requirements. CLP1 Policy SP6.4 states that the Council will seek to reduce flood risk and protect groundwater and aquifers.
- 8.80 The London Plan SPG states new development should incorporate Sustainable Urban Drainage Systems and green roofs where practical with the aim of maximising all opportunities to achieve a Greenfield run-off rate, increasing bio-diversity and improving water quality. Greenfield runoff rates are defined as the runoff rates from a site, in its natural state, prior to any development. Typically this is between 2 and 8 litres per second per hectare. Surface water run-off is to be managed as close to source as possible.
- 8.81 A Flood Risk Assessment has been submitted and whilst information has been submitted that assesses flooding and drainage matters associated with the development and indicating that the development is not likely to result in an increased flood risk, additional information will need to be submitted. Conditions are recommended to ensure a detailed drainage scheme that incorporates SuDs, as requested by the Lead Local Flood Authority (LLFA), is delivered.
- 8.82 The LLFA are satisfied that drainage can be addressed through the imposition of suitable planning conditions (which are recommended). As such the impact of the development on water resources and flood risk is considered to be acceptable and in accordance with the provisions of local and national policy.

Impact on trees

- 8.83 Section 11 of the NPPF seeks to conserve and enhance the natural environment London Plan Policy 7.21 states that trees and woodlands should be protected, maintained and enhanced. Croydon Plan 2006 (Saved Policies 2013) policy NC4 requires that valued trees especially those designated by Tree Preservation Orders are protected. Croydon Local Plan: Strategic Policy SP7.4 seeks to enhance biodiversity across the borough.
- 8.84 There are a number of prominent trees along the boundary with Spurgeon Road and within the existing front gardens of the existing properties fronting Beulah Hill. An Oak tree (T1) and Copper Beech tree (T2) fronting Beulah Hill are protected by Tree Preservation Order 42, 2014. The scheme has been re-designed to now retain both these protected trees.
- 8.85 An arboricultural assessment has been submitted with the application which provides details of a number of trees including a pair of Cypress trees and a Cherry tree which are to be replaced with new trees and shrubs to be planted in locations which offer public amenity for the future. The remaining trees would be retained. The quality of these existing trees to be removed is mediocre and no objection has been raised by

the Council's Tree Section to their removal and their replacement with new tree species, such as Norway Maple and Swedish Whitebeam which have been suggested for the location. Full details of hard and soft landscaping, including replacement tree planting, together with details of tree protection for those to be retained are to be secured by condition.

Transportation, access and parking

- 8.86 Chapter 4 of the NPPF seeks to promote sustainable transport. London Plan Policies 6.3 and 6.13 and Croydon Plan Policies T2 and T8 require that development is not permitted if it would result in significant traffic generation which cannot be accommodated on surrounding roads. They also require that acceptable levels of parking are provided. Disabled parking spaces are required by Policy 6.13 of the London Plan and the accompanying Housing SPG.
- 8.87 Policy 6.9 of the London Plan states that secure, integrated and accessible cycle parking should be provided by new development in line with minimum standards. These are 1 space for each 1 bedroom unit and 2 spaces for 2 bedroom + units.
- 8.88 The site is in an area with a Public Transport Accessibility (PTAL) rating level of 2 which is poor, although it is adjacent to a level 3 area and has good access to a number of bus routes and railway stations. Given the accessibility rating level of the site, the overall level of car parking provision of 17 spaces proposed is considered to be acceptable and an on-street parking survey has been undertaken that indicates that there are plenty of available on-street spaces in Spurgeon Road should there be any overflow parking. The proposal includes 4 disabled parking spaces. This would provide a satisfactory level of car parking for the 4 wheelchair accessible or easily adaptable units proposed
- 8.89 The Council's highway officer has advised that the layout of the basement parking area is acceptable. Electric Vehicle Charging Points are provided in accordance with the standards set out in the London Plan. A condition would be attached to any permission granted to secure that at least 50% of the disabled car parking spaces have EVCP's.
- 8.90 Reference is made in the Transport Statement submitted to the availability of Car Club spaces nearby. A provision for future occupiers to be provided with 3 years membership of a car club scheme would be secured via the Travel Plan and by S106 legal agreement.
- 8.91 60 cycle parking spaces are also proposed to be located at basement and lower ground floor levels. This provision meets the London Plan requirements for the site and is supported.
- 8.92 The proposal provides a single vehicle access to basement parking off Spurgeon Road. The access road is single lane width with passing spaces at the top and bottom of the ramp, and is to be controlled by a traffic signal system that gives priority to vehicles entering the site. This is considered acceptable.
- 8.93 Details of vehicle sight lines and pedestrian visibility splays have been provided and are acceptable. There are a number of existing vehicle crossovers onto Beulah Hill and Spurgeon Road that will no longer be required and these will need to be

reinstated to footway at the applicant's expense. Such works to the public highway would be secured by S106 legal agreement.

- 8.94 Given the scale of the development, it is considered that conditions requiring the submission of a detailed Travel Plan and Demolition and Construction Logistics Plan are warranted in order to ensure that both the construction phase of the development do not result in undue impacts upon the surrounding highway network. These would be secured by condition.

Sustainability

- 8.95 At the heart of the NPPF is a presumption in favour of sustainable development. It states: *'Planning plays a key role in shaping places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impact of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure'*.
- 8.96 The NPPF actively promotes developments which reduce greenhouse gas emissions (para 95). In determining planning applications it states that local planning authorities should expect development to comply with local policies and expect that layout of development in a manner that would reduce energy consumption through building orientation, massing and landscape (para 96).
- 8.97 Policies 5.2 and 5.3 of the London Plan state that development proposals should minimise carbon dioxide emissions and exhibit the highest standards of sustainable design and construction, whilst policy 5.7 states that they should provide on-site renewable energy generation. London Plan policy 5.5 states that Boroughs should seek to create decentralised energy networks, whilst Policy 5.6 requires development proposals to connect to an existing heating network as a first preference if one is available.
- 8.98 Policy SP6.2 from the borough's Local Plan Strategic Policies sets out the Council's expectations in relation to energy and CO2 reduction, in accordance with the London Plan. It states that it would be expected that high density residential development would (a) incorporate site wide communal heating systems, and (b) that major development will be enabled for district energy connection unless demonstrated not to be feasible or financially viable to do so.
- 8.99 The Sustainability and Energy Assessment submitted with the application demonstrate that the proposal has been prepared in accordance with relevant strategic and local planning policies to provide a high quality and sustainable building in this key central location.
- 8.100 The fundamental principle on which the sustainability policies are based is an expectation that development will follow the energy hierarchy: be lean (use less energy), be clean (supply energy efficiently), and be green (use renewable energy).
- 8.101 The proposed development incorporates the following key sustainability features:
- The re-use of previously developed land;
 - Effective site layout in response to the neighbouring context;
 - Efficient design of the proposed massing, openings and internal layouts so that habitable spaces across the site benefit from abundant daylight and sunlight levels, whilst impacts to neighbouring buildings are kept to a minimum;

- Significant carbon emissions' savings on-site (22.5%) through energy efficiency measures and the uptake of renewables;
- The specification of water efficient fittings to limit water consumption to less than 105 litres per person per day for domestic uses;
- The protection of natural features of ecological value, especially the Copper Beech Tree at the front of the proposal site, and the improvement of biodiversity on site through soft landscaping and green roofs on the townhouses;
- The incorporation of SuDS in the form of underground storage, blue roofs and permeable paving; and
- Effective pollution management and control: the development is not expected to have any significant adverse effects to air, noise, land or watercourses.

8.102 The proposal would achieve CO2 savings on site of 22.5% against Part L 2013 and renewable energy generation offsets using photovoltaic panels of 19.3% of CO2 emissions in excess of the 10% target under Policy EP16 of Croydon's adopted Local Plan policy.

8.103 The Council's policy now requires zero carbon. The carbon dioxide savings proposed fall short of the policy requirement. The Council would accept a cash in lieu payment to be secured through a S106 legal agreement and the applicant has accepted this.

Other Planning Issues

Employment and training

8.104 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 and an employment and skills strategy.

Designing Out Crime

8.105 For a building of this nature, the main considerations would relate to access to the building and the areas of public realm around the building.

8.106 Discussions have taken place with the Designing Out Crime Officer and the proposed development would incorporate principles of Secured by Design. This would be secured by condition to ensure that the proposed development provides a safe and secure environment.

Conclusions

8.107 All other relevant policies and considerations, including equalities, have been taken into account. Planning permission should be granted for the reasons set out above. The details of the decision are set out in the RECOMMENDATION.

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