

## PART 6: Planning Applications for Decision

## Item 6.1

**1 SUMMARY OF APPLICATION DETAILS**

Ref: 18/06069/FUL  
 Location: 4-20 Edridge Road, Croydon CR0 1EE  
 Ward: Fairfield  
 Description: The erection of a part 33 storey, part 11 storey building providing 230 residential units (Use Class C3)  
 Approved: See Appendix 1  
 Documents:  
 Applicant: Croydon Tower 1 Ltd  
 Agent: MRPP  
 Case Officer: Scott Schimanski

|                        | 1 bed      |    | 2 bed     |    | 3 bed     |    | Total      |
|------------------------|------------|----|-----------|----|-----------|----|------------|
|                        | 1p         | 2p | 3p        | 4p | 4p        | 5p |            |
| <b>Market Housing</b>  | 3          | 88 | 24        | 34 | 27        | 8  |            |
| <b>Affordable Rent</b> |            | 6  |           | 20 | 10        | 7  |            |
| <b>Intermediate</b>    |            | 3  |           |    |           |    |            |
| <b>All Tenures</b>     | <b>100</b> |    | <b>78</b> |    | <b>52</b> |    | <b>230</b> |

| <b>Number of car parking spaces</b>  | <b>Number of cycle parking spaces</b> |
|--------------------------------------|---------------------------------------|
| 7 Blue Badge / 1 Car Club- on street | 312 plus 10 short stay                |

- 1.1 This application is being reported to Planning Committee in accordance with the Committee consideration criteria as the scheme proposes more than 200 new residential dwellings.

**2 BACKGROUND**

- 2.1 An earlier iteration of this proposal was presented to the Planning Committee at pre-application stage on 19<sup>th</sup> July 2018. This proposed the erection of a part 36, part 9, part single storey building comprising approximately 233 dwellings with undercroft car parking and associated works.

- 2.2 The main issues raised were as follows:

- Harm was identified to the setting of Croydon Minster. Although different opinions were expressed regarding that harm (including cumulative harm with other developments), verified views were needed to fully explain the impacts, and the harm caused to be minimised and mitigated by the benefits of the scheme;
- The proposed affordable housing (25% of habitable rooms with a policy compliant tenure split) was noted, but there were impacts on heritage assets and the benefits of the scheme needed to include a “good proportion” of affordable homes (at least 30%);

- Concerns were raised about the overall amount of development proposed, whether the site could accommodate the scheme's impacts, and whether sufficient public realm was proposed;
- Whilst noting the need to unlock sites for development, it was suggested that the developer work with adjacent landowners to promote more comprehensive regeneration;
- The highway and public realm needed further consideration, both to the north of the site, and south along Edridge Road. Edridge Road was noted to be windy, and the building needed to avoid creating a wind tunnel;
- The safety of pedestrians crossing the flyover needed to be carefully considered, with a linked traffic light controlled crossing across the Croydon Flyover preferable to barriers;
- The limited parking provision was noted, although reductions in parking were generally supported in PTAL 6 areas;
- The architectural expression and materials were along the right lines, although further work was needed to ensure the proposal positively contributed to the way Croydon was developing. The proposed colonnade was felt to not work and should be reviewed to ensure more meaningful space;
- The "tectonic eyelids" were not supported as they detracted from the design of the building;
- The construction impact needed to be considered, alongside other developments in the town centre

2.3 The scheme was presented to the Place Review Panel (PRP) on 21 June 2018 at pre-application stage. The main issues raised by the Panel were as follows:

- The scheme should not breach the parapet line of the Grade I listed Croydon Minster in Rectory Grove views, as this would set a dangerous precedent which would substantially harm its significance and Croydon's character and skyline.
- The pavement on Edridge Road is too narrow, and the building's footprint should be reduced to allow increased public realm and avoid a cramped setting.
- The lower 3-6 storeys should be improved with a plinth or podium to improve the street relationship. The proposed colonnade may jar with the scale of the two storey houses on Edridge Road, and is too small to offer public realm benefits.
- The general approach to the massing across the site (subject to appropriate height), and framed elevational treatment was supported.
- Further work is required to resolve the heritage impacts, height, detailed design, and the quality of the public and communal amenity spaces.

- The development would enhance the need for a formal pedestrian crossing of the A232 to allow people safe access to central Croydon.

2.4 Since the Committee and presenting to the PRP, the proposal has been further developed in consultation with officers and the above comments (where possible) have been addressed in amendments and additional justification provided for 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 legal agreement to secure the following planning obligations:

- 1) 22.8% Affordable Housing provision (95% London Affordable Rent, 5% London Shared Ownership)
- 2) Affordable Housing review mechanism (early and late stage review) and nominations agreement
- 3) Air quality contribution of £23,000
- 4) Local employment and training strategy (construction) including a financial contribution of £154,000
- 5) Contribution of £20,000 towards child play space provision
- 6) Zero Carbon off-set contribution (currently £311,832, dependant on final energy strategy)
- 7) Future connection to planned district energy scheme
- 8) Sustainable transport contributions (£561,813)
- 9) Car parking permit free restriction for future residents
- 10) Travel Plan and monitoring
- 11) Provision of car club space and membership for new residents
- 12) Public realm and highway works
- 13) Green Travel Plan
- 14) Loss of revenue for removal of on-street parking bays
- 15) Retention of scheme architects (or suitably qualified alternative architect)
- 16) TV and digital mitigation
- 17) Monitoring fees and payment of legal fees
- 18) Any other planning obligation(s) considered necessary by the Director of Planning and Strategic Transport

3.2 That the Director of Planning and Strategic Transport has delegated authority to negotiate detailed terms 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) Commencement within three years (compliance)
- 2) Approved Plans (compliance)

- 3) SUDS and Flood Risk (prior to commencement)
- 4) Energy Strategy and carbon reduction (prior to commencement)
- 5) Construction and Environmental Management Plan (prior to commencement)
- 6) Archaeology (prior to commencement)
- 7) Contamination (prior to commencement)
- 8) Remediation Strategy (Prior to commencement)
- 9) Detailed Surface Water Drainage Scheme (prior to commencement)
- 10) Details of protection of water (Thames Water) infrastructure (prior to commencement)
- 11) Public art (prior to commencement)
- 12) Aviation warning lights, construction and on building (prior to commencement)
- 13) Typical façade materials/detailing – 1:20 details used to produce 1:1 mock-ups, with 1:5 details to confirm following approval (prior to superstructure)
- 14) External facing materials, including physical samples and detailed drawings of design elements – including interim wind break (prior to superstructure)
- 15) Sample panels on site (prior to superstructure)
- 16) Balcony design (prior to superstructure)
- 17) Outdoor seating (prior to occupation)
- 18) Flues and Ventilation (prior to occupation)
- 19) Hard Landscaping (prior to occupation)
- 20) Façade maintenance and cleaning strategy (prior to occupation)
- 21) Soft Landscaping (prior to occupation)
- 22) Landscape and public realm management plan (prior to occupation)
- 23) Biodiversity (prior to occupation)
- 24) Playspace (prior to occupation)
- 25) Public Realm and External Building Lighting (prior to occupation)
- 26) Delivery and Servicing (prior to occupation)
- 27) Car Park management plan (prior to occupation)
- 28) Refuse storage (prior to occupation)
- 29) Wind Mitigation (prior to occupation)
- 30) Thames Water – upgrade of water supply (prior to occupation)
- 31) External Noise Mitigation (prior to occupation)
- 32) Hard and Soft Landscaping details of Public Realm, Roof Top Amenity Spaces and Children's Play Spaces (prior to occupation)
- 33) Piling (prior to specific works)
- 34) Removal of interim windbreak (following completion of tower elements of Leon Quarter scheme)
- 35) Water use (compliance)
- 36) Use Classes (compliance)
- 37) Noise limits (plant) (compliance)
- 38) Secured by design (compliance)
- 39) Accessible Homes (M4) (compliance)
- 40) Lifts (compliance)
- 41) Electric charging (compliance)
- 42) Cycle Storage (compliance)
- 43) All features and materials must comply with Part B of the Building Regulations in relation to fire safety (compliance)
- 44) Submitted Air Quality assessment (compliance)
- 45) Any other planning condition(s) considered necessary by the Director of Planning and Strategic Transport, and

## Informatives

- 1) Community Infrastructure Levy
- 2) Subject to legal agreement
- 3) Construction Logistics Plans
- 4) Flood Risk
- 5) Thames Water
- 6) Site notice removal
- 7) Any other informative(s) considered necessary by the Director of Planning and Strategic Transport.

- 3.4 That the Planning Committee confirms that it has had special regard to the desirability of preserving the settings of (including views of) listed buildings and features of special architectural or historic interest as required by Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 3.5 That the Planning Committee confirms that it has paid special attention to the desirability of preserving or enhancing the character and appearance of the settings (including views of) of the Central Croydon Conservation Area, the Croydon Minster Conservation Area and the Chatsworth Road Conservation Area as required by Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the NPPF.
- 3.6 That, if by within 3 months of the planning committee meeting date, 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



*Image 1: Proposed Site Plan*

- 4.1 A residential development is proposed on land located on the western side of Edridge Road, near the junction with the A232. The 0.2051 hectare vacant site is located to

the south of Croydon town centre. The Croydon Local Plan 2018 (CLP) places the site within the Croydon Opportunity Area (COA) (CLP Policy DM38.1).

- 4.2 The scheme would comprise a 33 storey tower and lower 11 storey shoulder building, containing a total of 230 residential homes. The tower would contain 187 homes with 3 of them intermediate housing (London shared ownership), whilst the shoulder building would contain 43 homes, all of which would be London Affordable Rent. This equates to 46 affordable homes (22.7% by habitable room) on a split of 95:5 low cost rent: intermediate.
- 4.3 In design terms, the proposal would present a contemporary building with a distinctly residential appearance that would relate to the surrounding approved developments especially those with recent resolutions to grant on the adjacent Leon House site to the south. The material palette of pale brick and metal (bronze) cladding would result in a modern, contextual appearance. The site is suitable for tall buildings, but the proposal would have some impacts on the settings of the nearby heritage assets, as considered below in this report.
- 4.4 The development would be car-free except for blue badge spaces, with cycle and bin storage provided on-site. There would be 7 blue badge parking spaces on-site, with a loading bay and single car club bay on Edridge Road.
- 4.5 The proposal includes a tree lined area of paved public realm that incorporates the buildings colonnade to link the street with the buildings double height plate glass ground level entry lobbies and communal facilities. The public realm will be an open area that would provide a safe yet functional space for the users.
- 4.6 The proposal has been amended since it was originally submitted. Amendments included the removal of 2 floors of accommodation (12 units), alterations to the façade and the introduction of wind mitigation measures including an interim wind break on the first floor terrace. The alterations will result in a reduced impact upon heritage assets, give the building a more residential and high quality appearance and reduce the impacts of the development on adjoining residential properties.

### **Site and Surroundings**

- 4.7 The site is immediately surrounded by predominately commercial development with office blocks ranging in height from 8 to 21 storeys. To the north is Impact House, previously a 9-16 storey office building which has been converted to residential through prior approval. To the south is Leon House, a 21 storey building which also has also been converted to residential through prior approval, as well as a resolution to grant permission for a comprehensive redevelopment known as the Leon Quarter. The Leon Quarter includes the addition of three new buildings up to 31 storeys in height. The surface level Grosvenor House car park to the immediate south of the application site has the potential to come forward in the future for residential development. Further south on Edridge Road are two storey terraced dwellings.



*Image 2: Location Plan*

- 4.8 The surrounding area is very mixed in character. To the north along High Street is the southern end of the Town Centre's Main Retail Frontage, and further to the south is the Restaurant Quarter on South End. Edridge Road itself is a quieter residential street, with a mix of modest 2-storey houses and larger buildings to the northern end.
- 4.9 The site is in the Croydon Opportunity Area (COA) and the Croydon Metropolitan Centre, allocated for residential use by the Croydon Local Plan 2018, with an indicative number of homes of 180-220.
- 4.10 The COA Framework also describes its location as the "Southern and Old Town" area and the Croydon (Housing) Typologies Report (Maccleanor Lavington, 2010) identifies the site within the "Southern Gateway area" and potentially attractive to family dwellings.
- 4.11 The site's Public Transport Accessibility Level (PTAL) is 6a (Excellent on a scale of 0-6b, where 6b is the most accessible). The site is well served by public transport, within walking distance of George Street tram stop, South Croydon station, East Croydon station (with direct trains to central London, Brighton, and two international airports) and a number of bus routes. High Street and Edridge Road are both Classified Roads, and Edridge Road joins Park Lane (the flyover) which is part of the Transport for London (TFL) Strategic Road Network.
- 4.12 The site is not in a Conservation Area and there are no heritage assets on the site, nor directly adjoining, although Wrencote House (Grade II\* listed) is nearby to the west and friends church to the north east. A number of heritage assets are located in the wider vicinity.
- 4.13 A tall building on the site would potentially be visible from the setting of a number of heritage assets, including St. Andrew's Church (Grade II), Whitgift Hospital (Almshouses) on North End (Grade I), Croydon Minster (Grade I) and Wrencote House. Notably, the view of the Town Hall Clock Tower from North End is a designated view, and the view of Croydon Minster (Grade I) from Rectory Grove is identified in the Croydon Minster CAAMP SPD.

- 4.14 The site is within an Archaeological Priority Area (APA), is within Flood Zone 1 and there is potential for groundwater at the surface and the whole borough is an Air Quality Management Area (AQMA).

### **Planning History**

- 4.15 Planning permission was **granted** in 2009 (ref: 07/05042/P), and was renewed in 2013 (ref: 12/01033/P) for the erection of a building of part 9 and 23 storeys with basement comprising offices on part ground and first floor level and 61 two bedroom, 60 one bedroom and 12 three bedroom flats; formation of vehicular access and provision of 27 parking spaces with ancillary cycle and refuse areas. This lapsed in 2016.

#### Leon House

- 4.16 Leon House was recently converted from office to residential use with the following planning history:

- Prior approval **granted** for use of floors 1-7 and 9-20 as 249 flats (applications 15/02926/GDPO, 15/02927/GDPO, and 15/02928/GDPO).
- Planning permission **granted** for alterations and use of floor 8 as 9 residential units (application 16/01467/P)
- Planning permission **granted** for change of use of the eighth floor of Leon House from Class D1 use to 14 no. residential units (17/04817/FUL)

- 4.17 A resolution to grant planning permission has been made for demolition of existing retail and office units and redevelopment of the site to provide a mixed use development within three buildings up to 31 storeys, providing up to 357 residential units (Use Class C3) and flexible units for retail, professional service and food and drink uses (Use Class A1-A5), creation of a new public square, landscaped communal gardens, and associated highway works; basement car parking; cycle parking; waste storage; and associated works (18/06140/FUL). This is with the GLA Stage 2.

#### Bauhaus / Centrillion Point, Mason's Avenue

- 4.18 Planning permission was **granted** for alterations and erection of extensions to provide a community/retail unit on part of ground floor, 100 two bedroom, 78 one bedroom, 6 three bedroom flats in the remainder of building and erection of 5 two bedroom mews houses; formation of vehicular access and provision of associated parking on 29 Sep 2005 (04/03575P) and has been implemented.

#### Impact House, 2 Edridge Road

- 4.19 Impact House has recently been converted to residential units, following applications 16/04750/FUL, 16/02182/P and 15/02723/GPDO which were **granted** for change of use from offices to residential units, and external alterations.

## **5 SUMMARY OF KEY REASONS FOR RECOMMENDATION**

- 5.1 The site is allocated in the Local Plan for residential development, and is in an area where tall buildings are acceptable. The proposed 230 new homes would make a significant contribution to housing delivery in a well-connected location, within the Croydon Metropolitan Centre and Croydon Opportunity Area.



- 5.2 22.7% of the proposed homes (by habitable room) would be affordable housing, of which 43 would be London Affordable Rent within the shoulder block. The remainder (3) would be intermediate London Shared Ownership within the tower.
- 5.3 The development is considered acceptable in design terms, subject to high quality materials and detailing which are to be secured by planning conditions. The heights of the proposed buildings would result in some harm to the surrounding heritage assets: Croydon Minster; Wrencote; Whitgift Almshouses, Queens Gardens, The Adult School Hall and Croydon Quaker Meeting House and the Central Croydon Conservation Area. The harm caused would be “less than substantial” and with regard to the relevant legislation, policies and guidance, the harm is considered to be accompanied by clear and convincing justification, and outweighed by the public benefits provided in the form of new housing and affordable housing.
- 5.4 The new dwellings would provide good quality accommodation. The impacts to neighbours would be limited, and the proposal would comply with the Council’s policies with regard to transport, environmental impacts and sustainability, subject to the recommended planning conditions and s.106 obligations.

## **6 CONSULTATION RESPONSES**

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

- 6.2 The following were consulted regarding the application:

### **Mayor of London (GLA) (Statutory Consultee)**

- 6.3 The GLA (referred due to the proposal being more than 30m high, including more than 150 flats, and having a total floorspace of more than 15,000 square metres) made the following comments:
- The general principle of the residential development is supported in strategic planning terms. Resolution of detailed matters is required for the proposal to comply with the London Plan and the draft London Plan.
  - Concerns were raised with the height of the proposal and its impact upon nearby heritage assets, particularly Croydon Minster and the Central Croydon Conservation Area. In order for the scale of development to be acceptable, the public benefits of the scheme must outweigh any harm the development would have on surround heritage.  
(OFFICER COMMENT: Subsequent to these comments, the height of the proposal has been reduced by 2 storeys thereby reducing the buildings presence within view corridors from the conservation area and the setting of the Croydon Minster. The impact of the proposal on surrounding heritage items is discussed in detail within the HERITAGE section of this report).
  - The scheme exceeds the guidance range with regards to density. In order for this to be considered acceptable, the impacts on the heritage and urban environment must be overcome.  
(OFFICER COMMENT: The scheme as amended reduced both the buildings height and density which results in lesser impacts upon the existing built environment including the nearby heritage assets. How the development achieves this is discussed within the HERITAGE and CHARACTER AND APPEARANCE sections of this report).

- The layout, accessibility, size and orientation of the proposed units and private open space (balconies) is supported. The overall proportion of family size accommodation as a whole and as a proportion of affordable units is supported.
- The level of play space together with the amount of communal amenity space is supported subject to a S106 agreement securing off-site play equipment for young people. All communal open space must be accessible to all.  
(OFFICER COMMENT: The applicant has agreed to make a contribution to the off-site provision of play equipment for young people).
- The quantum of affordable housing and the proposed tenure mix do not satisfy the 'threshold approach' to planning applications. Early and late stage review mechanisms are required.  
(OFFICER COMMENT: The financial viability information has been independently scrutinised, as explained in the AFFORDABLE HOUSING section of this report, and review mechanisms are required by the s.106 agreement.)
- The simple and refined architectural treatment is supported. However, given the split of tenure between the taller and lower elements of the building, the quality and appearance of building materials must be consistent between the affordable and private accommodation.  
(OFFICER COMMENT; Council staff have worked extensively with the project team to ensure that the entirety of the scheme is of the highest quality in terms of materials, external appearance and cohesiveness. How this is achieved is discussed within the DESIGN section of this report).
- The quality, layout and size of the public realm is generally supported, however some concern with the impact of the colonnades and tree planting on movement within this area is raised.  
(OFFICER COMMENT: The public realm including the design of colonnades and planting has been amended to create a more open area that would provide a safe yet functional space for the users. How this is achieved is discussed in details within the DESIGN section of this report).
- Further transport measures and additional cycle parking are required. The use of on street parking spaces for blue badge, car club and loading bays were also recommended. A contribution towards public transport infrastructure is required.  
(OFFICER COMMENT: Both loading bay and car club spaces are proposed to be provided on the highway adjacent to the site. These spaces together with contributions towards Public Transport improvements would be secured by way of S278 and S106 agreements. With regards to cycle storage, the proposal includes 1.35 spaces per dwelling. The acceptability of cycle storage is discussed within the TRANSPORT section of this report).

### **Historic England (Statutory Consultee)**

- 6.4 The height of the proposal will have impact upon the surrounding historic environment, particularly on the significance of the views of the Grade I listed Croydon Minster from Rectory Grove. The harm caused would be less than substantial to the significance of the Minster, which must be taken into consideration as part of the overall planning balance.

(OFFICER COMMENT: In response to these comments and those from the GLA, the scheme was revised resulting in the removal of two storeys from the building and the impacts on heritage assets are considered in full in the HERITAGE section of this report)

## **Transport for London (TFL) (Statutory Consultee)**

6.5 In general, the proposal is supported, however some concerns with the schemes ability to comply with transport policies of the London Plan were raised. The following issues were raised:

- A review of the existing pedestrian and cycle routes to key destinations to demonstrate compliance with the Healthy Streets indicators be undertaken.
- TFL request a contribution towards improvements to pedestrian access across the A232.
- Further, it must be demonstrate how additional demand for Blue Badge car parking (up to 10%) can be provided.
- Need to secure a Car Parking Management Plan by condition.
- Provide suitable justification to support the requirement for an on-street car club bay and consider a reconfiguration of the existing on-street car parking.
- Increase the amount of cycle parking in line with the minimum standards,
- Secure a contribution towards transport improvements in the area,
- Detailed Travel Plan must be secured through the Section 106 agreement,
- Delivery and Servicing Plan and Construction Logistics Plan secured by condition and discharged in consultation with TfL.

(OFFICER COMMENT: S.106 obligations and planning conditions are recommended to secure TFL's requirements, including contributions for Public Transport improvements and £200,000 towards the provision of a pedestrian improvements across the A232. The proposed number of cycle spaces would not meet London Plan (or Draft London Plan) standards, however it must be recognised that the number of spaces proposed (312) is significant and allows 1:1 per flat with a significant number of cycle spaces remaining for flats that have 2 cycles. The location of the site close to the town centre with a proposed new at grade pedestrian crossing allowing pedestrians to cross the flyover close to the site and access public transport more readily, would be a significant improvement in line with healthy streets which does not just advocate cycling. In light of this the number of cycle parking spaces proposed is considered acceptable).

## **Local Lead Flood Authority (LLFA) (Statutory Consultee)**

6.6 LLFA initially objected to the scheme, pending additional drainage details which have been provided (OFFICER COMMENT: The Council's Drainage Engineer subsequently confirmed that this information can be addressed by the recommended pre-commencement condition).

## **Designing Out Crime Officer**

6.7 No objection subject to Secured by Design accreditation (OFFICER COMMENT: A condition is recommended).

## **Thames Water**

6.8 No objection. Informative recommended (OFFICER COMMENT: The recommendation includes the Thames Water informative).

## **Natural England**

6.9 No comments regarding this proposal.

### **Environment Agency**

6.10 No objection subject to the inclusion of conditions relating contamination protection measures (OFFICER COMMENT: A condition is recommended).

### **Heathrow Airport**

6.11 No objection.

### **Gatwick Airport**

6.12 No objection.

## **7 LOCAL REPRESENTATION**

7.1 The application has been publicised by site notices, a local press notice, and letters to neighbours. 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: 3 Objecting: 3 Supporting: 0

7.2 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:

| <b>Summary of objections</b>   | <b>Response</b>   |
|--|---|
| Scale and massing  |   |
| The buildings would be an overdevelopment of the site.   | <p>The site is located in an area suitable for tall buildings.</p> <p>The proposal in terms of setbacks, scale and massing would be consistent with existing and approved buildings located within the southern section of the Croydon town centre.</p>   |
| Privacy, Daylight and sunlight   |   |
| The proposed building will overlook neighbouring buildings and result in loss of daylight and sunlight | A sunlight and daylight assessment was submitted which demonstrates acceptable impacts on properties that surround the site. A minimum separation of 18 metres is proposed between windows/balconies, a distance that is considered appropriate for such an urban environment. It is noted that overlooking of a commercial building is not a material consideration. |
| Noise  |   |
| The building works will be noisy and affect residents at Leon House.                                   | The building works will be temporary, and subject to conditions to limit inconvenience to neighbours and the highway network.   |

| Non-material issues  |  |
|--|--|
| <p>The development would result in a loss of income due to loss of light and potential interruption of access and parking.</p> | <p>The loss of income to a commercial building is not a material consideration. BRE daylight/sunlight guidance focusses attention on residential use, as well as some buildings where the occupants have a reasonable expectation of daylight; this is not usually the case for offices and in this particular circumstance the site is allocation with a previous planning permission for a tall building, so there is a reasonable expectation that a building of height will be delivered on site.</p> <p>The proposal does not include the right of way to the north of the site and therefore would not result in reduced access to the neighbouring property.</p> <p>The proposal is a complete redevelopment of the site and would result in the removal of the unsafe boundary wall.</p> |
| <p>Unsafe boundary wall.</p>   |  |

## 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 and any other material considerations. Details of the relevant policies and guidance notes are attached in Appendix 2.

### National Guidance

- 8.2 The National Planning Policy Framework 2019 (NPPF) and online Planning Practice Guidance (PPG) are material considerations which set out the Government's priorities for planning and a presumption in favour of sustainable development.
- 8.3 The following NPPF key issues are relevant to this case:

- Delivering a sufficient supply of homes
- Building a strong, competitive economy
- Ensuring the vitality of town centres
- Promoting healthy and safe communities
- Promoting sustainable transport
- Making effective use of land
- Achieving well-designed places
- Meeting the challenge of climate change, flooding and coastal change
- Conserving and enhancing the historic environment

### Development Plan

- 8.4 The Development Plan comprises the London Plan 2016 ("London Plan"), the Croydon Local Plan 2018 ("Local Plan"), and the South London Waste Plan 2012.
- 8.5 Whilst the emerging New London Plan is a material consideration, the weight afforded to it is down to the decision maker, linked to the stage a plan has reached in its

development. The Mayor's Intend to Publish version of the New London Plan was submitted to the Secretary of State who has now issued a direction and one awaits to hear how the London Mayor responds. The New London Plan remains at an advanced stage of preparation but full weight will not be realised until it has been formally adopted.

8.6 The relevant Development Plan policies are listed in Appendix 2.

Supplementary Planning Guidance (SPG) / Document (SPD)

8.7 The relevant SPGs and/or SPDs are listed in Appendix 2.

## **9 MATERIAL PLANNING CONSIDERATIONS**

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

- Principle of development
- Affordable housing
- Housing tenure, types and quality
- Character and appearance
- Heritage
- Impacts on neighbours
- Impacts on the surrounding environment
- Transport, parking and highways
- Sustainable design

### **Principle of development**

9.2 The Local Plan supports the delivery of new homes across the borough, and identifies that at least 10,760 additional homes will be delivered on allocated sites in the Croydon Opportunity Area by 2036. The site is allocated by the Local Plan (Site Allocations 32) for new housing, indicatively for 180 to 220 units.

9.3 The site is within the Croydon Opportunity Area ("Opportunity Area"). The Opportunity Area Planning Framework (2013) encourages new homes, the revival of the high street, and improved streets and amenity spaces.

9.4 The site is also within Croydon Metropolitan Centre, where Local Plan Policy SP3.10 sets out a flexible approach to office, housing and retail uses.

9.5 Local Plan Policy SP4.5 encourages tall buildings in the Opportunity Area, subject to compliance with the Local Plan's detailed policies and the Opportunity Area Planning Framework, which supports tall buildings on the site in principle subject to good design and any negative impacts being limited.

9.6 The site has good access to public transport, local shops and services within the town centre, and is therefore well placed for high density residential-led development.

9.7 The site is currently used as a private surface level 'commuter' car park with capacity for approximately 75 vehicles. There is no other use associated with the site. In terms of loss, Policy DM31 states that such car parks are not generally supported as they have the potential to undermine future car parking strategies for the borough. Such uses are also at odds with strategic transport, air quality and climate change

objectives outlined within both the London Plan and Croydon Local Plan. As such there are no provisions within the current planning framework that seeks to protect such land use. Furthermore, the principle of its loss has historically been accepted with approvals for the site.

- 9.8 The erection of a high density residential development, including tall buildings is acceptable in principle, subject to compliance with the other Local Plan policies.

### **Affordable Housing**

- 9.9 The Local Plan requires the Council to seek a minimum of 30% affordable housing, but negotiate to achieve up to 50% affordable housing (subject to viability), and seek a 60:40 split between affordable rented homes and intermediate homes.
- 9.10 From the outset the applicant proposed that 100% of the affordable component would consist of London Affordable Rent (LAR - a low cost form of affordable rent, supported by the Mayor of London) homes. The LAR homes would be located entirely within the 11 storey lower element of the building. This 'block' of the development would have its own lifts, service facilities and entry.
- 9.11 The original offer was to provide 43 LAR homes (out of a proposed 242 as originally submitted) within the lower standalone block of the scheme which equated to 20.7% affordable housing (by habitable room). This proposal was independently viability tested to ascertain the quantum of affordable homes.
- 9.12 Since then, officers negotiated amendments to the scheme, including a reduced height of the tower element which resulted in the loss of two storeys and a total of 12 units. Since the amendments resulted in a reduction in the number of proposed units, the subsequent Affordable Housing was amended and renegotiated following review. In order to maintain all affordable rent units within a single block, three shared ownership units were also secured within the main tower element. The final percentage to be secured is 22.7% (146) by habitable room, on a 95:5 split (affordable rent to shared ownership tenure mix).
- 9.13 As advised above, the scheme sought delivery of 43 LAR homes within the standalone element. To establish whether this was an acceptable offer two scenarios were run; one fixing the LAR to 43 homes (to establish if the scheme could deliver any more) and the second on a 30:70 split (to establish what the scheme could deliver on a London Plan policy compliant split). Scenario 1 showed there was a surplus, with Gerald Eve concluding that the scheme could potentially accommodate 184 private units, 43 affordable rent units and 3 shared ownership units equating to 20% by unit and 22.7% by habitable room. Scenario 2 showed that the maximum level of affordable housing the scheme could accommodate whilst using a 30:70 affordable rent to shared ownership tenure split is 25.2% by unit and 27% by habitable room.
- 9.14 Whilst the scenario testing showed Scenario 2 would deliver more affordable housing, it was a hypothetical exercise to establish what quantum could be delivered with a policy compliant split. It is important to be clear that the scheme was designed to deliver the entirety of the shoulder block as LAR, with its own entrance, management regime and an in principle agreement with a Registered Provider. To revert to 30:70 would result in the need to undertake significant amendments to the layout, as well as introducing RP management issues. Furthermore, we have seen a number of recent schemes providing a bias towards shared ownership to get the affordable

housing percentage up; there is a significant need for low cost rental homes. The independent review concluded that the 43 London Affordable Rent Units within a single standalone block plus the addition of 3 London Shared Ownership Units, which represents a 95% affordable rent and 5% shared ownership mix was the most appropriate. Whilst this is a divergence from policy, it is a mix that optimises a much needed form of affordable housing within Croydon. A Registered Provider has expressed an interest in the scheme, stating they are supportive of a mono-tenure LAR specific block with a range of 1, 2 and 3 bed units to allow for a sustainable mix.

- 9.15 The proposed affordable housing is therefore considered the maximum reasonable as no additional affordable housing could be viably provided, with early stage and late stage review mechanisms recommended in the s.106 agreement to capture any changes (for example, increases in house prices) which may result in increased affordable housing provision. This should target, assuming there is any uplift, provision of additional affordable housing on site.

### **Housing Tenure, Types and Quality**

#### Housing Mix

- 9.16 Policy DM1 requires appropriate housing choice for sustainable communities and within central areas of high public transport accessibility, states that at least 20% of units should have three or more bedrooms, although some of those homes can be provided as 2 bedroom 4 person homes during the first three years of the Local Plan subject to viability. The strategic borough wide target is 30% 3-bedroom units.
- 9.17 As outlined by the table below, 22.6% of units would have 3+ bedrooms which exceeds Policy DM1 requirements. The proposal exceeds the requirement of Policy DM1.1b. Furthermore, 41% of the London Affordable Rent would have 3B5P units in line with the priority needs for family sized homes and affordable rent units.

| 1 bedroom | 2 bedroom | 3 bedroom |
|-----------|-----------|-----------|
| 100       | 78        | 52        |
| 43.5%     | 33.9%     | 22.6%     |

#### Housing Density

- 9.18 London Plan Policy 3.2 states that development should optimise housing output for different types of location within the relevant density range shown in Table 3.2. Table 3.2 sets out an indicative 650–1,100 habitable rooms per hectare for sites in central settings with high Public Transport Accessibility Levels (acknowledging this should not be used mechanistically).
- 9.19 The proposed density is 1,150 units per hectare, which exceeds the guidance range and would make efficient use of an urban site. Sites of higher densities are subject to increased scrutiny to ensure that symptoms of overdevelopment are avoided and this has been fully assessed by both Council and GLA officers, finding the scheme acceptable. See the CHARACTER AND APPEARANCE and IMPACTS ON NEIGHBOURS sections later in this report for further detail.

#### Quality of Accommodation



- 9.20 Policy SP2.8 of the Croydon Local Plan 2018 indicates that housing should cater for residents' changing needs over their lifetime and contribute to creating sustainable communities. Individual units should meet the standards set out in the London Housing SPG and Nationally Described Space Standards.
- 9.21 The proposed building would have legible and well-designed entrances, with overlooked and attractive frontages. The building would have a generous high colonnade at the ground level fronting Edridge Road, with a double height entrance space which would be clearly visible from the street. Internally, the communal spaces would have sensible layouts, generous entrances, wide corridors, and spaces for internal letterboxes. No flat would be more than nine metres from the nearest lift. Both of the blocks would have no more than six units per corridor. Some natural light will be provided to the corridors of the upper levels of the taller tower and also the stair well of the lower level tower. There would be easy access for residents to bin stores, cycle storage gym and communal amenity areas.
- 9.22 All units would comply with the Nationally Described Space Standards, with sensible layouts, storage space and well-proportioned rooms. Many would be dual aspect. There would be some single aspect units, which would mostly be one-bedroom flats, and all of which would be no deeper than they are wide thereby allowing good access to natural light. No north facing single aspect units are proposed.
- 9.23 A daylighting assessment was undertaken demonstrating that 95% of all tested rooms met or exceeded the BRE guidelines for average daylight factor (ADF) requirements and that 94% met with the recommendations for no sky line NSL. In terms of sunlight, 84% of assessed rooms will receive levels of sunlight (APSH) that satisfy recommended targets throughout the year including during winter.
- 9.24 Given the good levels of internal daylight through the development and the recognised constraints for developments such as this in achieving high internal sunlight levels, the daylight and sunlight levels afforded to future occupiers of the development would be acceptable.
- 9.25 The A232 is located within 100 metres to the north of the site and is an obvious source of noise pollution. However, the site is largely buffered from this noise source by the 16 storey Impact House which is located immediately to the north. Notwithstanding this, to protect future residents from external noise impacts, all units include double glazing which is considered sufficient to avoid unacceptable internal noise from plant or traffic. The proposal also includes mechanical ventilation to ensure adequate air flow when openable windows are shut to reduce noise impacts. To ensure that a reasonable level of amenity for future residents is obtained throughout the year, the noise mitigation measures (double glazing and ventilation systems) will be secured by way of condition.
- 9.26 The proposed units would also experience good levels of privacy, with all windows being at least 20m from the directly opposite windows, and the closest distance between facing balconies and windows is 20m to Impact House to the north. Due to the orientation and layout all units would benefit from acceptable levels of privacy and outlook.

#### Accessible Housing

- 9.27 Level access from Edridge Road is proposed, with both parts of the building containing a lift which allows step free access to all homes.

- 9.28 25 (or 10.8%) of the proposed units are designed to be accessible 'wheelchair user' dwellings, which satisfies the Local Plan requirement for new homes to comply with Building Regulation Part M4(3) (Wheelchair User Dwellings). The remaining 89.2% of units would be accessible and adaptable M4(2) dwellings. Planning conditions are recommended to secure compliance with Parts M4(2) and M4(3) of the Building Regulations. The site offers level access routes to wheelchair accessible public transport (including buses, trams and trains), therefore wheelchair users would not be wholly car dependent. Seven accessible parking spaces are proposed at ground level with direct and uninterrupted access from both lobbies, which will be allocated to future occupiers who are blue badge permit holders.

#### Outdoor Amenity Space and Playspace

- 9.29 All units are required to have access to private and communal amenity space which meets the requirements of the London Housing SPG in terms of size.
- 9.30 All units have direct access to private balconies ranging from 5 to 9sqm and the building also includes three communal terraces on levels 1 (190sqm), 11 (129.3sqm) and 33 (324.2sqm).
- 9.31 The three terrace areas would provide a combined area of 643.2sqm of communal amenity space. The three areas are sited on the western side at first floor level and on the roof of both the lower and main tower. These areas allow opportunity for residents to access to areas of open space with direct sunlight throughout the day.
- 9.32 In terms of play space, the child yield calculator expects 75 children to reside in the building. The proposal includes 569sqm of play space and this combined with the shared landscape amenity areas and the private amenity spaces (balconies) is considered to meet with the minimum benchmarks for play space for 0-5 year olds. A financial contribution of £20,000 will be secured in lieu of the shortfall of on-site provision for older children based on the costs of equipping an area of approximately 181sqm with suitable equipment and including an allowance for future maintenance.
- 9.33 A sunlight test was carried out for all outdoor communal amenity spaces. All tested areas meet the BRE's Sun Hours on Ground test, which requires that more than 50% of each area receives at least two hours of direct sunlight on 21st March. During the summer months, when the areas are more likely to be utilised for open air activities, the vast majority of the space receives in excess of six hours of sunlight.

#### Housing Tenure, Types and Quality Summary

- 9.34 Overall, the proposed development would provide well-designed homes which would offer a sense of arrival and place of retreat, in line with the aspirations of the London Housing SPG. The homes themselves would offer each resident a combination of good outlook, privacy, sunlight and daylight, internal spaces (with over-sized units in some cases), private amenity spaces, and sensible internal layouts. There would also be well-designed communal landscaped gardens and playspace. Overall, the proposed units would all offer an acceptable standard of accommodation.

### **Character and Appearance**

#### Layout

- 9.35 The site is generally level allowing uninterrupted direct access to both lobbies and level public realm fronting Edridge Road. Given the relatively level nature of the site, the layout confirms to general practice with active frontage areas facing Edridge Road

to the east and plant and service equipment areas positioned the rear. The topography means that all areas would be step and ramp free from the highway.

- 9.36 As with the external appearance of the building, the double height ground floor consists of two distinct areas that service the two residential components above. The two areas are split by a driveway that provides access to the on-site parking spaces (blue badge), refuse and cycle storages areas. About two thirds of the ground floor would be utilised by the market component of the development, with the quarter to the north of the driveway servicing the affordable rent component.
- 9.37 Residential access to the taller tower that contains the market and shared ownership units is via a large lobby located immediately adjacent to Edridge Road and in the southern quarter of the site. From the lobby, residents access the lift core that consists of three lifts all of which are glazed to the street at ground level to provide activation and passive surveillance. This section of the building also includes a resident's lounge/workshop area and a small gym both present to the street. The refuse and cycle storage areas for the market component would be accessed from the lift lobby. The main staircase is located immediately behind the main lobby.

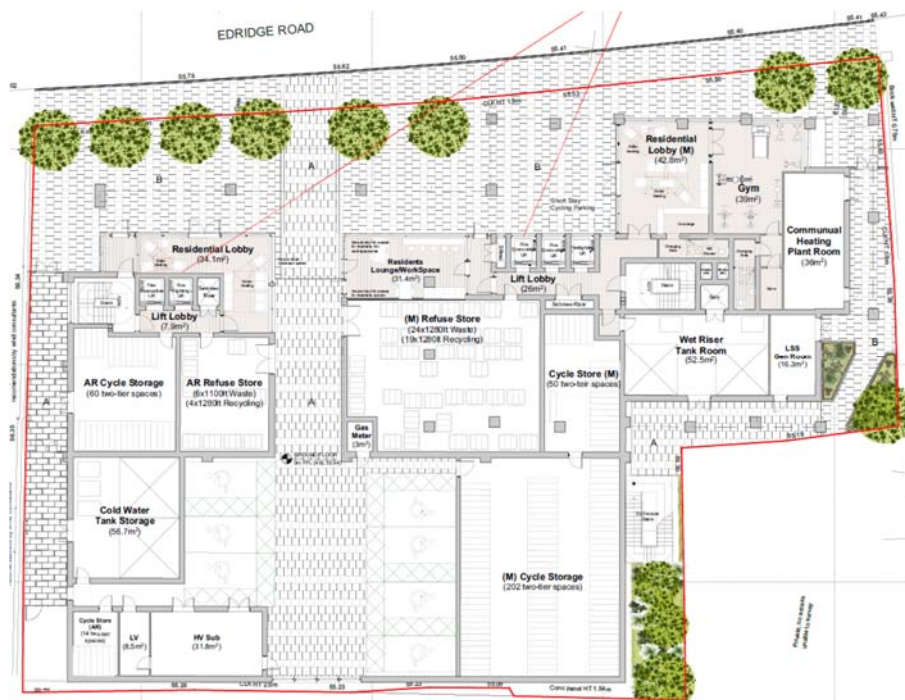


Image 3: Ground floor layout

- 9.38 The affordable rent units are accessed from a smaller lobby area in the north eastern corner of the site. The lobby provides direct access to a lift core containing three lifts and also access to the stairwell, refuse and cycle storage areas.

#### Height, Scale and Massing

- 9.39 The site is in the 'Edge Area' of the Croydon Opportunity Area, where Local Plan Policy DM38 allows tall buildings as long as negative impacts on sensitive locations are limited, and they are of high quality form, height, and design.
- 9.40 The proposed tower would form part of a cluster of tall buildings located at the southern end of the Croydon Centre. Planning permission has been granted for buildings up to 35 storeys at the former Taberner House site, and 25 storeys at Wandle Road Car Park (which are both under construction). The Council has also

made a resolution to grant the Leon Quarter development that includes three additional towers rising to a maximum of 31 storeys. The image below shows the height of the proposal (red) compared to existing (grey) and approved (cream) buildings in the immediate vicinity of the site.



*Image 4: Massing of the proposed blocks*

- 9.41 In 2008 the Council allowed a 23 storey mixed use development thereby establishing the acceptance of a tall building. At 33 storeys, the proposal is higher than the previous approval. Officers have assessed the scheme and considered the height of other consented schemes in the immediate vicinity, and conclude that the overall height of the building is acceptable.
- 9.42 Although a tall building on the site is a reasonable expectation, the overall acceptability of this particular tall building is determined by how well it fits into its surroundings when viewed from both near and from a distance. To establish this, a number of verified views were submitted from various important vantage points. These views demonstrated how the height, mass and design of the scheme would contribute positively to the skyline.
- 9.43 The heights of the buildings were also informed by the heritage impacts (discussed further in the HERITAGE section of this report). In terms of the townscape and public realm impacts, the proposed height, scale and massing would successfully introduce a high density residential development to the site, contributing positively to the overall skyline and respecting the site's varied surroundings.

#### Articulation, Materials and Detailing

- 9.44 The building has been designed with a carefully limited material pallet consisting of a light cream toned multi-stock brickwork with bronze feature work. The materials combined with the gridded division of the elevations helps to create a residential scale and appearance to the building. The two distinct massing elements sit above a two storey colonnade entrance that faces the public realm adjacent to Edridge Road. The Edridge Road elevation of a taller tower is dominated by a generally regular two storey high grid pattern formed by brick columns and horizontals and recessed balconies. A secondary recessed bronze grid is featured between the larger brick grid form with a varying off-set to create visual variation, depth and complexity to the elevations. The top two floors would be enclosed by double height bronze columns with the glazing recessed further back from the façade to create depth. Balustrades

have been included in each bay of the penthouse levels which would reinforce the residential character of the building. These have been designed with the verticals at an angle to provide visual privacy from the most exposed lines of sight.



*Image 5: Proposed eastern (Edridge Road) Elevation*

- 9.45 The Edridge Road elevation of the lower element is differentiated through the introduction of more substantial brick piers that provide the basis of a thicker grid pattern set over four level repeats. This helps to differentiate the two forms and gives the lower building a more solid and robust character, in contrast with the slender proportions of the taller tower. The two top floors of this section would be a bronze podium structure setback from the brick framing below. Grey louvers have also been introduced within this section to give the impression of a more slender roof slab edge



*Image 6: Upper level material detail*



9.46 The northern elevation of the building would be the most prominent as it will be caught in view corridors from the town centre to the north. The key design feature of the building will dominate this façade and consists of a four level brick grid pattern with faceted bronze panels, referred to as ‘gills’, inserted within the grid. The ‘gills’ play a functional role, forming part of the ventilation system. These gills are arranged in two sets and feature on both the taller and lower building elements. These gills spring from the centre of each tower element to create a unique and easily identifiable feature which provides a dynamic rhythm to the façade. They are of a sufficient scale appropriate to the building and which can be read within distant views from which the proposal will be visible. The gills are proposed as single sheets of aluminium with a bronze, matt anodised finish. The diagonals of the gills would be highlighted with a shadow gap along the edges with the air intakes made from dark grey powder coated aluminium louvres with a light green back section.



Visualisation of proposed residential development looking south down Edridge Road from A232

Image 7: Proposed view looking south down Edridge Road from A232

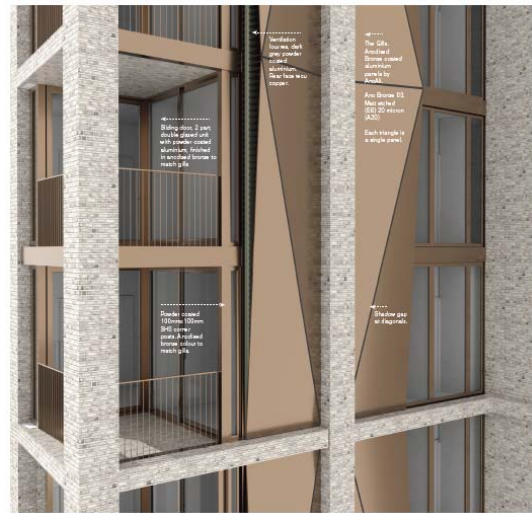


Image 8: Details of bronze cladding/gills

9.47 The window frames will be power coated in an anodised bronze to match the gills and provide a subtle measure of visual consistency. Balustrades will consist of angled metal uprights. The uprights would be angled at 30 degrees which would result in varying views when moving around the building. The angled uprights would enhance privacy to the units and also create visual interest to the building.



*Image 9: Details of Balustrades*

- 9.48 The articulation, materials and detailing of the proposed building would successfully mediate between the varied heights and typologies of the surrounding buildings. The uniform appearance of the design would ensure that the building sits comfortably within the cluster of buildings located in this section of the Croydon Town Centre whilst preserving its own unique identity.



*Image 10: Public Realm and entry details - Edridge Road*

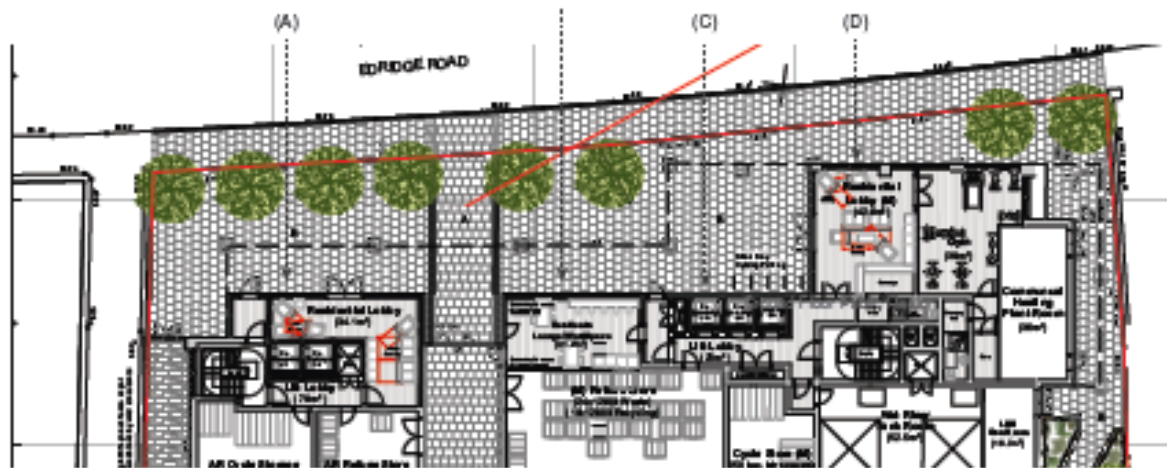
### Designing Out Crime

- 9.49 The proposal was considered by the Metropolitan Police Service's Designing Out Crime Officer who advised that the site is in a high crime area, and identified potential concerns which will require additional detail to be provided (for example, CCTV), which could be addressed through planning conditions. In order to ensure a safe, inclusive and accessible development where crime and disorder, and the fear of crime, do not undermine the quality of life, Secured by Design accreditation is recommended to be secured by a planning condition.

### Public Realm and Landscaping

- 9.50 Due to the relatively small size of the site, there is only limited scope for areas of public realm. The size and location of public realm was discussed at length during

the pre-application stage and was considered a key way of achieving a suitable form of development in terms of siting and street scene. The proposal provides a usable single area of public realm fronting Edridge Road. This space is located to the eastern side of the building, ranging in depth from 2m to almost 6m, extending into a 5m high colonnade with the tower element set back from the highway. This area of public realm has been assessed to have access to reasonable levels of sunlight. Further, the wind assessment demonstrates that this area would allow the public to sit and enjoy the space without undue impacts from high winds. In terms of safety the public realm has been designed to create layers of physical components that provide a safe yet welcoming environment.



*Image 11: Public Realm and Landscaping*

- 9.51 The landscape proposals are in principle supported, however they do require detailed design development. A condition is recommended to ensure that the details of the public realm and landscaping (planting species, planting densities, sections showing build-ups, junctions and technical details, materials, furniture, lighting etc.) are high quality.
- 9.52 The hard standing is proposed to be in line with the Public Realm Design Guide. A tonal change is proposed for the access road to denote it while maintaining a level threshold without a step to ensure pedestrian priority, which is supported.
- 9.53 No existing trees are located on the site at present, but new trees and soft landscaping are proposed which would result in an improvement to biodiversity. These are within the site boundary so will need to be maintained by the applicant and not the Council. However, the roof-top private amenity areas could be enhanced in terms of their biodiversity offer. This will be secured by condition and should ensure a variety of soft landscaping species supportive of pollinators, natural grass to replace artificial grass and, addition of biodiversity features such as bug-hotels and bird boxes which could form part of the play provision via a nature trail.
- 9.54 The play provision is addressed earlier in the report, but the final details will be determined at condition stage. The precedents shown have a positive sculptural approach which is supported. The applicant is encouraged to consider where possible that play equipment/ features be created through natural features and materials which could also further enhance the biodiversity of the site. This allows a wider variety of use within the amenity area beyond play by younger residents.



### Public Art

- 9.55 Local Plan Policy DM14 requires the inclusion of public art, which is to be secured by a planning condition. Although no specific form of public art has been proposed, the applicant has committed to the provision of design elements within both the public realm and the building itself that will contribute to the aesthetic quality of the locality. The use of elements such as bespoke street furniture, unique paving design, decorative lighting and decorative gates within and adjacent to the public realm have been identified as ways to achieve this. The condition will include review of the public art strategy, brief and final designs and include physical samples and proofs of concept where appropriate.

### **Heritage**

- 9.56 The Planning (Listed Buildings and Conservation Areas) Act 1990 requires (at section 66) with respect to listed buildings, that special regard is paid to the desirability of preserving or enhancing the building or its setting or any features of special architectural or historic interest which it possesses. With regard to conservation areas (at section 72), it requires special attention to be paid to the desirability of preserving or enhancing their character or appearance.
- 9.57 The NPPF places strong emphasis on the desirability of sustaining and enhancing the significance of heritage assets and their settings, and affords great weight to the asset's conservation. At paragraph 193 it states that:
- “great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be)... irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm”*
- 9.58 Any harm to a designated heritage asset, including from development within its setting requires “clear and convincing justification” (paragraph 194), with less than substantial harm weighed against the public benefits delivered by the proposed development (paragraph 196).
- 9.59 Policy DM18 of the Local Plan permits development affecting heritage assets where the significance of the asset is preserved or enhanced. Policy SP4 requires developments to respect and enhance heritage assets, and Policy DM15 permits tall buildings which relate positively to nearby heritage assets.
- 9.60 The setting of a building is defined in the glossary to the NPPF as ‘the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surrounding evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral’. The site is not within a Conservation Area and there are no designated heritage assets either on or immediately adjacent to the site. However, due to its height, design and prominence, it would interact with the setting and views of a number of heritage assets.
- 9.61 A number of views have been assessed throughout the course of the application, including verified views, dynamic fly-throughs and computer modelled views. A heritage assessment has also been submitted. The proposal has been considered by the Council's Conservation Officer and Historic England, who have identified harmful impacts to heritage assets.

### Croydon Minster

- 9.62 The Minster is a Grade I listed building of extremely high historic and architectural interest and community value, being the medieval parish church for Croydon. It marks the historic core of the old town and has strong associations with the Archbishop of Canterbury and George Gilbert Scott who was responsible for its extensive rebuilding after a fire in the late 19<sup>th</sup> century. The Minster is prominent in its locality, and in key long views. There are two main views where the full elevation of the tower can be appreciated. One is from Rectory Grove which is a residential street laid out specifically to align with the Minster and forms an important part of the Minster's setting. The view along Rectory Grove allows the full tower elevation and an uninterrupted silhouette to be appreciated. The view is identified as a key view in the Conservation Area Appraisal and contributes to the setting of the listed building.
- 9.63 The proposal is situated behind the Minster when viewed from Rectory Grove and impacts the silhouette of the listed building from certain points, and its prominence. The initial proposal rose above the height of the tower and could be viewed between the pinnacles. Whilst officers acknowledge the presence of existing and consented development within this view, no other development interrupts the pinnacles of the Minster. Historic England, the GLA and the Council's Conservation Officer raised concern with this harm to the setting of the listed building. As a result, the scheme has been reduced by two storeys to ensure it does not rise above the height of the tower element of the Minster. This minimises the level of harm caused to the Minster, with a relatively minor change to the development resulting in a considerable difference in impact by allowing the 'crown' of the building to remain uninterrupted. In other views the development remains visible to the side of the Minster, again disrupting the silhouette of the building. Whilst it is still visible to the side of the Minster and rises to the full height of the tower, this is from a relatively small section of Rectory Grove.



*Image 12: View of Croydon Minster along Rectory Grove with position of proposed building*

- 9.64 The proposal would cause less than substantial harm to the setting of Croydon Minster.

### Central Croydon Conservation Area and Croydon Town Hall Clocktower

- 9.65 Central Croydon Conservation Area is the commercial and civic heart of Croydon. Its street layout is largely medieval in origin and it retains much of its plan form and historic fabric. Surrey Street forms an important market street with buildings from the 17<sup>th</sup>, 18<sup>th</sup>, 19<sup>th</sup> and 20<sup>th</sup> centuries. North End and the High Street form part of an historic route with Roman origins. Key views are identified along its length including a designated view of the Town Hall clocktower (Grade II listed and local landmark).
- 9.66 The proposed building would be evident at the south terminus of dynamic views along North End. More generally it will be viewed in relation to a number of other tall buildings in this location, but will also rise up behind and above the Clocktower in some views including the designated viewpoint on North End. Due to its height and specific location, this is a different relationship to other development in the vicinity, although was a similar (but now taller) relationship to the previous (now lapsed) consent. The Clocktower will still be visible in front of the proposed development, but its prominence and silhouette will be affected.
- 9.67 It is acknowledged that the proposed has been designed to present a slim tower form in views from this direction, and that there are trees along North End which currently limit visibility of the development from the designated viewpoint. The presence of these trees however cannot be relied upon (and is reduced in winter) and the tall tower form will still be apparent in association with the Clocktower. The development will also be visible in views from Surrey Street (a key street in the conservation area), and in glimpsed views from Queens Gardens (locally listed historic park and garden).
- 9.68 The proposed is considered to cause less than substantial harm to the setting of the Central Croydon Conservation Area, and to the prominence and landmark status of the Grade II listed Clocktower.



*Image 13: Verified views south along High Street showing the proposed development*

### Whitgift Almshouse

- 9.69 The Whitgift Almshouse (Grade I listed) are a 16<sup>th</sup> century complex of Almshouses. They are of historic and architectural interest, to which the scale of the building, its fabric and the roofscape contribute greatly. The site is located some 400 metres from the Almshouses, and the development would be visible in views along North End and the High Street in conjunction with the Almshouses. Here, the development rises

above 3-4 storey Victorian buildings fronting the High Street. It has been designed to present a slim tower form in these views. The proposal is considered to cause less than substantial harm to the setting of the Almshouse.

#### The Chatsworth Road Conservation Area

- 9.70 Chatsworth Road Conservation Area contains a substantial grouping of late Victorian and Edwardian houses, many of which are of high architectural quality and fifteen of which are Locally Listed. The proposal will be visible from a number of points within the northern section of the conservation area, above the roofline of buildings in the conservation area. The Chatsworth Road Conservation Area Appraisal and Management Plan (CAAMP) acknowledges that the CA is located in close proximity to the town centre with existing and proposed tall buildings visible in the longer views, which forms part of the setting of the CA. The development would result in less than substantial harm to the conservation area.

#### Wrencote

- 9.71 Wrencote is a Grade II\* listed building on the High Street in close proximity to the site. The building retains its integrity and displays high quality architecture. It is one of few buildings from the 18<sup>th</sup> century surviving in the borough, and its relationship with the historic north-south route survives, however its historic context has been largely lost. It is now largely surrounded by modern development of much greater scale, which provides a context that emphasises the townscape evolution of the area.
- 9.72 The proposed tower would rise above this listed building, and would further emphasise the townscape that has evolved around the listed building. It would however be of greater height than existing development and visible directly behind the main elevation; in a location which is currently clear sky (admittedly affected by the previous (now lapsed) consent). The design and colour palette of external materials would contrast with that of the listed building to ensure that the historic building and later development remain clearly legible, whilst being of a high quality to reflect the sensitivity of its setting. The scale of the building would nevertheless increase the dominance of modern development on the setting of the listed building.
- 9.73 The proposed is considered to cause less than substantial harm to the setting of Wrencote.

#### The Adult School Hall and Croydon Quaker Meeting House

- 9.74 The proposal is located to the south-west of these Grade II listed buildings. They are of a domestic scale. The construction of the Adult School Hall is of particular significance due to its use of timber framing resulting in an interior reminiscent of a medieval barn and it is therefore the interior where the main interest lies. The Croydon Quaker Meeting House is a distinguished work by a prolific Quaker architect Hubert Lidbetter of both architectural and historic interest. The buildings are surrounded by larger scale buildings that dominate its setting. The existing 8-9 storey buildings that sit between the site and these heritage assets, reduce the overall impact of the additional development such that their setting is preserved.

#### Harm and Public Benefits

- 9.75 No direct harm to the fabric of any heritage assets would occur as a result of the proposal, however it would cause harm to the settings of key heritage assets as set out above.

- 9.76 The scheme has been reduced in height by two storeys to minimise the level of harm caused, particularly on views of the Minster. The resultant scheme has been identified to cause less than substantial harm.
- 9.77 A much smaller development (or no development) would avoid harm to heritage assets, but that would not deliver the scheme's benefits in terms of housing, and specifically, affordable housing. Officers are of the view that the benefits of the proposal could not be achieved, without that level of harm. Those benefits, accompanied by the minimisation of the accompanying harm, offer clear and convincing justification for the harm to heritage assets identified above.
- 9.78 Having concluded that the scheme gives rise to "less than substantial harm", and that there is clear and convincing justification for that harm, it is necessary to weigh that harm against the public benefits. The public benefits weighed against the scheme are as follows:
- the delivery of a significant quantum of housing, exceeding the site allocation and contributing positively to the borough's housing stock; and
  - a significant proportion of affordable housing, including 43 units at London Affordable Rent and 3 at London Shared Ownership; and
  - the opportunity to make use of land which is currently underutilised; and
  - the delivery of improved public realm along Edridge Road.
- 9.79 Officers are of the view that those public benefits would outweigh the harm caused to the various heritage assets. Officers are satisfied that the approach adopted by the applicant in terms of design, heritage and townscape is sound and can be supported.
- 9.80 As the site lies within the Central Croydon Archaeological Priority Area, a Archaeological Assessment was undertaken. The findings of the assessment revealed that there is a low to moderate potential for prehistoric to medieval material and a high potential for post-medieval and modern material. Although no basement is proposed, the potential extent of foundations is likely to impact upon any unknown archaeology. To safeguard any archaeology, a planning condition is recommended requiring a written scheme of investigation to safeguard the archaeological interest.
- 9.81 Subject to the recommended conditions, the proposed buildings would result in a high quality design which contributes positively to the skyline and surrounding townscape, provides a set of high quality environments, reflects the materiality and richness of detailing within its local context, and successfully balance intensification with high quality active frontages and pedestrian design features. The development would therefore result in a high quality environment which contribute positively to the character and appearance of its setting.

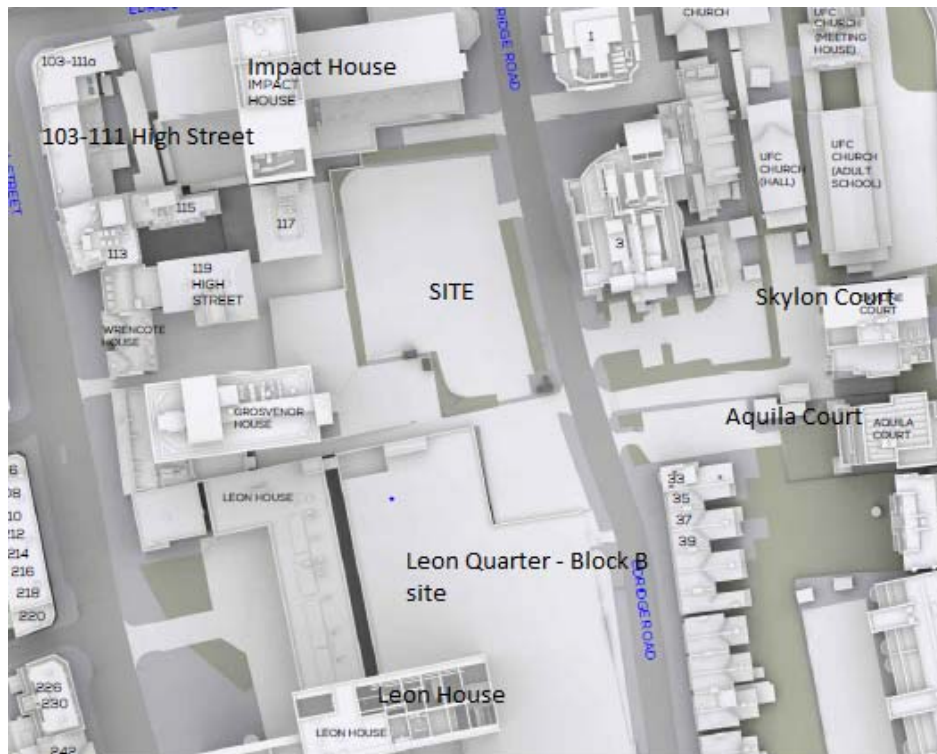
### **Impacts on Neighbours: Daylight and Sunlight Impacts**

- 9.82 A sunlight and daylight assessment was submitted with the application. It considers the impacts of the proposed development on the adjacent residential neighbours in accordance with the 2011 Building Research Establishment (BRE) guidelines. The neighbouring residential properties facing the site were tested for daylight impacts. Those residential windows which were also within 90 degrees of south (i.e. those receiving sunlight) were also tested for sunlight impacts. See Appendix 3 for BRE Guidance terms.



### Applying the BRE Guidance

- 9.83 The following diagram identifies the neighbouring properties tested for sunlight and daylight.



*Image 14: Diagram showing locations of neighbouring properties*

- 9.84 The BRE guidelines state that the “planning authority may wish to use different target values. For example, in a historic city centre, or in an area with modern high rise buildings, a higher degree of obstruction may be unavoidable.”
- 9.85 Based on occupation and distance 30 neighbouring properties were assessed for daylight/sunlight. A total of 21 properties will comply with BRE baseline criteria for both daylight and sunlight. Although BRE compliance would result in no adverse impact, limited impacts to neighbours may still be acceptable if they maintain acceptable living conditions overall. The impacts on the remaining nine properties are the focus of the assessment.
- 9.86 The daylight and sunlight assessment is based on the current vacant site and has not been compared against the previous permission granted for a 23 storey tower. The assessment also applied two methods of determining impacts upon surrounding buildings. The conventional BRE guidance criteria (with 27% VSC target) was used for all sites. However, for the reasons outlined below, a ‘mirror massing’ approach has also been used to provide a more contextual assessment of the impacts upon Impact House. This approach is accepted.
- 9.87 The vacant nature of the site allows an abnormally high level of daylight to reach the neighbouring residential properties, particularly Impact House to the immediate north. As such, any building constructed on the site with a similar mass and height to surrounding buildings would have a more noticeable impact upon daylight and sunlight to neighbouring buildings. The BRE Guidelines acknowledge the burden a vacant site places on a developer and provides an additional assessment for this. To ensure developments on vacant sites are able to match the height and proportions of

surround existing buildings, the BRE Guidelines allows the VSC and APSH targets for these windows to be set to those which 'mirror image' buildings of the same height and size, an equal distance away on the other side of the boundary. Only Impact House was assessed against a mirror massing alternative baseline.

- 9.88 This is particularly relevant given that this is a high density town centre brownfield site which CLP and the emerging London Plan seeks to optimise (in terms of its overall development potential). The NPPF and London Plan both state that an appropriate degree of flexibility needs to be applied when using BRE guidelines to assess daylight and sunlight impacts of new development on surrounding properties. The London Plan Housing SPG suggests that the guidelines should be applied flexibly to higher density development, especially in opportunity areas, town centres, large sites and accessible locations, where the BRE advice suggests considering the use of alternative targets. It goes on to state that to fully optimise housing potential on large sites, it may be necessary to depart from standard practice, whilst still achieving satisfactory levels of residential amenity and avoiding unacceptable harm.
- 9.89 Overall, when assessed against the Vertical Sky Component ("VSC") the proposal achieved a VSC compliance rate of 86.8%. When assessed against the No Sky Line ("NSL"), the scheme returns an NSL compliance rate of 96.6%. In terms of sunlight, the scheme returns a 93.5% compliance rate against the Annual Probable Sunlight Hours ("APSH") methodology.

#### Impact House

- 9.90 Impact House is a former office building located to the north of the site that has been converted to residential providing over 260 units. A total of 322 windows serving 217 rooms were assessed.
- 9.91 In terms of VSC, a conventional BRE assessment revealed that 53.1% (171 windows) meet BRE base guidance. With respect to the remaining windows, 27 will experience between a 20-29.9% minor adverse reductions, 87 would have a 30-39.9% moderate adverse reduction and 37 would experience a major adverse reduction of more than 40%. When assessed under a 'mirror massing' approach, the results showed only a marginal improvement (53.7%) in the total number of windows meeting the BRE base guidelines, however there was a noticeable improvement in the number of windows having a 40% or more reduction (37 to 0) and also the number of windows with a 30-39.9% reduction (87 down to 40).
- 9.92 210 rooms (96.7%) will comply with the BRE baseline guidelines for the NSL criteria. Of the seven rooms which fall below BRE baseline criteria for NSL the worst being a 34.4% moderate adverse reduction. All except two of the windows are located within the corner of the projecting wing of the property. This projecting wing flanks the windows/rooms to one side, meaning they are architecturally limited in receiving as high levels of daylight than those not positioned as close to this corner. It is understood that the remaining two rooms serve bedrooms, which have a lesser expectation of daylight in comparison to other habitable rooms. When the mirror massing assessment is undertaken, 99.1% of rooms would comply with NSL criteria.
- 9.93 In terms of sunlight, 171 windows were assessed. With the proposal in place, 162 windows (95%) will comply with the BRE baseline criteria for APSH. All the nine non-compliant windows would enjoy annual sun hours of between 19 and 27%, against a BRE recommended 25%. In relation to winter sun, these nine windows will continue

to enjoy between 3-5% of annual probable sunlight hours against a BRE recommended 5%.

- 9.94 It is noted that a 205sqm roof terrace is located on the ninth floor of Impact House. Concerns that the proposal would impact upon this area has been raised by residents of Impact House. In response to this concern, members are informed that this terrace is located above the north-west wing of Impact house and is subsequently overshadowed by the central 16 storeys element of Impact House. The proposed building is not expected to significantly further reduce this terrace of direct sunlight during the day.

#### Taberner House

- 9.95 80 windows serving 60 rooms have been assessed in relation to daylight (VSC and NSL). All 60 rooms comply with NSL and of the 80 windows, 75 (94%) meet BRE baseline guidance for VSC. All five windows that failed to meet the guidelines are set behind a recessed balcony which restricts daylight reaching them. As a result these windows already have VSC levels below 8% VSC, against a BRE recommended 27%. The absolute VSC loss to these windows is between only 1.4% to 1.6%.
- 9.96 In terms of sunlight, all 80 (100%) will comply with the BRE criteria for APSH.

#### Skylon Court

- 9.97 This building is located approximately 57 metres to the east of the site with 55 windows serving 40 rooms that were subject to daylight and sunlight assessment. 33 windows would experience a VSC moderate adverse reduction of between 20 and 39.9% with 19 windows having a VSC level below 15% level (the worst being 6.8%). Notwithstanding this, all of these windows are located beneath projecting balconies which limit the amount of sky visibility. In terms of NSL, 20% of rooms would experience a minor adverse reduction of between 20 and 29.9%, however all rooms would continue to have between 64.8 and 77.5 % of the room area with direct sky visibility.
- 9.98 In terms of sunlight, 3 windows (6%) would receive less than the recommended 25% of annual sun (the worst receiving 15%), however all of these windows will receive in excess of the BRE recommendation for winter sun of 5%(receiving between 7-10%). It is also noted that these windows are positioned beneath projecting balconies.

#### Aquilia Court

- 9.99 This residential building is located to the east of the site and fronts Park Lane. 55 windows to 39 rooms were assessed in relation to daylight and sunlight. 11 windows would see a reduction in VSC of between 20 and 39.9% (moderate adverse) and 2 would experience a reduction of more than 40% (major adverse). In perspective, these windows are either located adjacent to deep flank elevations or located beneath projecting balconies. In terms of NSL, only 10% of rooms would see a reduced level of between 20.5 and 22.9% (minor adverse) which is only slightly greater than the recommended 20% change and each of these rooms would still maintain between 60.4% and 68.1% of the room area with direct sky visibility.
- 9.100 In terms of sunlight, 6 (14%) of windows would fail to receive suitable sunlight hours during the year. However, these windows are all located in a section of the building that is flanked heavily on one side and at present only receive less than 11% of annual sunlight hours and 0% in winter.



#### Leon House

- 9.101 A 22 storey converted office building located to the south-west of the site. 99.8% of windows assessed would meet BRE guidelines of 27% with only 2 windows having an overall VSC reduction greater than 20% (20.6% and 20.9%) which is minor adverse. The VSC values for these two windows would remain acceptable at 18.6 and 19.3% respectively. All rooms within Leon House would comply with BRE guidelines for NSL. As this building is located to the south of the site, a sunlight assessment was not undertaken.

#### Leon Quarter Development (18/06140/FUL)

- 9.102 This scheme, with a resolution to grant planning permission, is located immediately to the south of the subject site and was designed to consider the presence of a tall building on the subject site. The closest adjoining building is known as 'Block B' and all units located on the northern side of this building are dual aspect to ensure that suitable levels of daylight and sunlight are received throughout the day. The impact of the proposal on Block B of the Leon Quarter Development was considered and the findings concluded that the proposal would not cause a materially greater (cumulative) impact.

#### 103 – 111A High Street

- 9.103 A three storey mixed use building located to the north west of the site. The use and layout of rooms is not known. Three windows would see a reduction in VSC of slightly more than 20%, however no more than 29.9% (minor adverse). The existing VSC of these windows is already low (between 7.2 and 11.6%) and therefore the absolute loss of VSC is only 2.4%. In terms of NSL, 6 rooms will also experience a reduction of between 21.6 and 36.7%. As with the VSC assessment, these windows currently have low NSL levels meaning that the reduction in percentage terms is disproportionate. In terms of sunlight, given the orientation of windows together with the presence of neighbouring tall buildings (Leon and Impact House), no sunlight assessment was undertaken.

#### Centrillion Point

- 9.104 A 12 storey converted office building located to the south of the site. Only a single window of the 182 tested would see a VSC moderate adverse reduction of greater than 20% (31.2%). The use of the room that this window serves is unknown, however it is located at the ground level and beneath an overhang. It currently only has a VSC of 1.6% so the reduction is unlikely to be noticeable to the human eye. In terms of NSL, all 82 rooms assessed will comply the BRE guidelines.
- 9.105 In terms of sunlight, as the site is located to the south of the site, the proposal will not result in any impact.

#### 33 Edridge Road

- 9.106 A two storey dwelling house with unknown floor plan. 10 of the 13 (77%) windows tested meet BRE guidelines. The three windows that would fall short would have a reduced VSC of between 20 and 39.9% (moderate adverse). Looking to the retained VSC levels to the three windows which fall below BRE baseline guidance, they will continue to enjoy between 17.6% to 23.6% VSC with the proposal in place and this is considered acceptable given the built up urban character of the site. In terms of NSL, all rooms will comply with BRE guidelines.
- 9.107 In terms of sunlight, of the eight rooms assessed 100% will comply with the BRE criteria for APSH.

### 35 Edridge Road

- 9.108 A two storey terrace property with 4 windows serving two rooms. One window falls below BRE recommendations with a major adverse VSC reduction of 60% (8% down to 3.2%), however this is one of two windows that service a single room. The other window serving this room would see a minor VSC reduction from 28.9 to 23.9 which given the built up urban nature of the site is considered a reasonable level. In terms of NSL, each of the two rooms complied with the BRE baseline guidelines. In terms of sunlight, all windows assessed complied with BRE criteria for APSH.

### Daylight and sunlight conclusions

- 9.109 Whilst the proposed development would result in some daylight and sunlight impacts for surrounding properties, in the vast majority of instances where impacts beyond BRE guidelines occur, these are only minor in nature and where these impacts occur, good levels of daylight and sunlight are generally still maintained, especially considering the central location of the affected properties. It should be noted that daylight and sunlight impacts for surrounding properties beyond BRE guidelines are inevitable in a situation where the existing baseline is a cleared site which is an anomalous in an urban context such as this. As such the daylight and sunlight implications of the proposed development for surrounding properties are acceptable.

### **Impacts on Neighbours: Privacy, Outlook, Noise and Disturbance**

- 9.110 The proposed development would be located on the opposite side of a road from its nearest residential neighbours across Edridge Road. These properties are in excess of 14 metres from the site and views across towards those neighbouring properties are therefore available from public areas. The next closest neighbouring habitable windows are those located on the southern side of Impact House to the north. These windows are 20 metres from the northern side of the building and are not expected to result in any additional overlooking than that of the previous approval on the site or have unreasonable privacy levels given the built up character of the locality. With a distance of more than 20 metres, the proposal would not result in unacceptable loss of privacy.
- 9.111 As with privacy, in terms of outlook the distance between the proposed building and its nearest residential neighbours is considered reasonable given its urban setting and being a site designated for high density residential use with a previous planning permission for a tall building. Notwithstanding this, the north-south orientation of the building maintains (even with the inclusion of the wind mitigation screen – as discussed in the MICO CLIMATE section of this report) an open outlook from many residential units within Impact House located to the north.
- 9.112 The primary access points for residents would be directly from the street frontage and would not introduce a noise source close to windows to habitable rooms on adjoining sites, particularly to Impact House to the north. In addition, no non-residential uses are proposed thereby eliminating the opportunity for unreasonable noise generation during the evening/night. Once constructed, the residential building is not expected to generate unreasonable levels of noise and general disturbance.



*Image 15: Site Plan showing distances between buildings*

## **Impact on the Surrounding Environment**

### Microclimate

9.113 The wind conditions around the scheme were assessed through wind tunnel testing of a scale model of the Proposed Development in context of the existing and the cumulative surrounding buildings. The measurements covered ground locations along the building façades and at corners, thoroughfares, within open amenity spaces at ground and terrace levels; and on pedestrian routes within and around the site. The focus was on the windiest season results (winter) and those for the summer season, when pedestrian activity generally requires 'calmer' wind condition.

9.114 Four configurations of the wind tunnel model were tested, as follows:

- Configuration 1: Existing Site with Existing Surrounding Buildings;
- Configuration 2: Proposed Development with Existing Surrounding Buildings;
- Configuration 3: Proposed Development with Existing Surrounding Buildings and Mitigation; and
- Configuration 3: Proposed Development with Cumulative Surrounding Buildings and Mitigation.

9.115 The findings of the testing identified that without mitigation, in periods of strong wind, the development would prevent the ability of people to be able to stand/sit comfortably on most parts of the 11th floor terrace during both the windiest season (winter) and also summer months. The tests also indicated that the scheme would result in excessive wind speeds at the ground level during the winter months and that these winds would directly impact upon Impact House located immediately to the north of the site. The results indicated that these conditions would make it more difficult and possibly more dangerous for residents of Impact House opening and closing windows on the southern elevation. The impact of wind during the summer months is less significant with regards to Impact House residents.

9.116 To overcome these impacts, the following mitigation measures were tested in the wind tunnel.

At ground level

- A 3-metre-high 50% porous fence along the North boundary of the Proposed Development.
- A 3-metre-high, 3m wide 50% porous gate limiting pedestrian access to the cold water tank storage.
- An 8m high 50% porous screen along the whole length of the Northern edge on the 1st floor terrace element.
- A 50% porous pergola (3m high, 15m long, 2m wide) along the Western edge. Shrubs and planters ranging from at least 1m to 2m height and 1m width along the perimeter.

On the 11th floor Lower Element

- Shrubs and planters ranging from at least 1m to 2m in height, and 1m in width, around the perimeter.
- Additional planting (shrubs 1-2m height, 1m width) around the perimeter of the maintenance area.
- A 3-metre-high solid screen along the northern edge of the private terrace to the South of probe location 78.

On the Roof Terrace

- Shrubs and planters ranging from at least 1m to 2m in height, and 1m in width, around the perimeter.

9.117 When tested, these mitigation measures sufficiently improved wind conditions to allow the spaces to be used as intended - sitting (green), standing (blue) and strolling (yellow). In terms of public realm and as shown by the green points on Image 16, the mitigation measures would ensure that the area of public realm fronting Edridge Road would be suitable for sitting even in the windiest time of the year. Similarly, the mitigation measures also demonstrate that all three areas of communal open space will have wind conditions calm enough for them to be used by residents throughout the year.



Image 16: Wind Conditions at ground level in the windiest (winter) season

9.118 With the exception of the 8m high 50% porous screen on the 1st floor terrace, the mitigation measures are generally contained within the form of the building as originally designed and would not result in any noteworthy changes to the appearance of the building.

- 9.119 The proposed 8 metre 50% porous screen has been proposed to be located along the northern side of the 1st floor terrace. The introduction of this screen reduced the velocity of wind directed at Impact House immediately to the north, thereby preserving a generally calm environment for residents of Impact House to safely open and close doors and windows on their southern elevation. The study showed that such a screen would only be required until the Leon Quarter development further to the south and west was constructed. Once constructed the Leon Quarter buildings would reduce the speed of wind from the south sufficiently to no longer require the screen. The design team propose a patterned metal mesh wall as a windbreak. As outlined, the windbreak would be 50% solid and the intention is for it to be removed once the Leon Quarter development is constructed. As there are no guarantee that the Leon Quarter development will be built out, the introduction of the wind break must be assessed as through it is permanent feature of the building.
- 9.120 The reduced scheme (as amended) was not re-tested through the wind tunnel as the consultant advised the reduced height would provide a beneficial effect as it would reduce wind speeds down the tower and locally around the tower at ground level. The other design amendments are not expected to change the wind microclimate around the site and therefore officers are comfortable the original wind assessment can be relied upon.
- 9.121 In conclusion, with wind mitigation secured by condition, the impacts are acceptable.

#### Contamination

- 9.122 The submitted contaminated land report concluded that the previous land uses on the site had low to moderate risk in terms of contamination potential and impact from past and present adjacent land uses is moderate. A desk study undertaken did not identify any issues that would preclude the site being used for residential purposes (and permission was granted previously for residential use). However, it is recommended that an investigation (Phase two) of geological conditions be undertaken with regards to the presence of radon, archaeology, asbestos and unexploded ordnance. A condition is recommended to ensure appropriate investigation, management and remediation.

#### Air Quality

- 9.123 The site is in an Air Quality Management Area (AQMA). The submitted air quality assessment demonstrates that there would be no exceedances of either short term objectives for NO<sub>2</sub> or particulate matter and that the development would be neutral in terms of construction and transport impacts. The air quality assessment found that there is no requirement for mitigation measures such as mechanical ventilation. Notwithstanding this, in addition to openable windows and balcony doors, units can be ventilated via a ducted ventilation system. A contribution of £23,000 towards air quality improvements to mitigate against non-road transport emissions will be secured via the S.106 agreement, and a condition is recommended to ensure that the construction impacts on air pollution are mitigated.

#### Flood Risk and Sustainable Drainage

- 9.124 The Flood Risk Statement concluded that the site has a low risk of flooding from all sources. Initial concerns were raised by LLFA regarding details on proposed mitigation measures within the building, particularly with regard to details of surface water drainage. To overcome concerns raised, LLFA requests a pre-commencement condition that requests this information be provided and approved prior to works commencing on site. Thames Water also requested conditions concerning discharge

of surface water, the SuDS proposed include rainwater harvesting, garden beds and permeable paving. The site would also be capable of storing water volume for a 1/100 year rain event plus a climate change 360-minute storm. The proposed measures are expected to have a positive impact to flood risk in the area and accord with the NPPF and Policy 5.12 of the London Plan. Subject to the recommended condition, the proposal would be acceptable in terms of drainage and flood risk.

#### Construction Impacts

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

#### Light Pollution

- 9.126 To avoid excessive light pollution, a condition is recommended requiring details of external lighting, including details of how it would minimise light pollution.

### **Transport, Parking and Highways**

- 9.127 The site has a Public Transport Accessibility Level (PTAL) of 6a and 6b (excellent) (on a scale of 0-6b, where 6b is the most accessible). The site is well served by public transport, and the PTAL reports show it within walking distance of George Street tram stop, South Croydon station, East Croydon station (with direct trains to central London, Brighton, and two international airports) and 18 bus routes. High Street and Edridge Road are both Classified Roads, and Edridge Road joins Park Lane (the flyover) which is part of the Transport for London (TFL) Strategic Road Network.

#### Parking

- 9.128 Policy DM30 requires that the impacts of car parking are reduced and the Opportunity Area Planning Framework also seeks to manage a reduction in the number of parking spaces. The only on-site parking spaces proposed are 7 blue badge spaces located to the rear of the site at grade level. The blue badge provision exceeds the 3% requirement as outlined within both the adopted and draft London Plans.
- 9.129 The site is within a Controlled Parking Zone. To provide suitable access to the site and the provision of a loading bay, 19 metres of on-street parking spaces need to be relocated further to the south on Edridge Road. Following the overall reduction in parking spaces immediately adjacent to the site, and in light of the site's good access to public transport and the provision of car club bays, the proposed development would be car free, with residents' eligibility for parking permits restricted by the s.106 agreement.
- 9.130 A single car club spaces is to be provided. It is intended that this space will be provided on-street opposite the site on Edridge Road for a minimum of 5 years. This space would be secured (and funded by the applicant) through the s.106 agreement subject to monitoring of uptake and demand through the travel plan. Membership of future residents to the car club operator for at least 3 years will also be secured through the s.106 agreement.
- 9.131 It is proposed that each of the seven internal blue badge spaces would include electric charging infrastructure. In addition, the single car club parking bay will also have electric charging infrastructure. This will be secured through the s.106 agreement.

- 9.132 No objection was raised by Transport for London or the council's Planning and Strategic Transport officer to the overall approach to parking, subject to the recommended conditions and s.106 obligations.

#### Cycle Parking

- 9.133 312 long stay cycle parking spaces and 10 short stay cycle parking spaces are proposed for the residential development. Each residential block would have its own cycle storage. Internal access to both cycle storage area is directly from the lobby/lift core areas of the building. Access to/from the street is either via a wide access way located to the north of the affordable rent lobby or via the central access way. The proposed cycle parking provides 1.35 spaces per unit and falls short of the current (360 plus 6 short stay) and draft New London Plan requirement. Notwithstanding this, given the sites location within the town centre, its high PTAL rating and the relatively small site area, Council staff are satisfied that on balance, the number of cycle spaces proposed are reasonable and that the provision of a larger cycle storage area would result in the undesirable loss of other facilities such as on-site blue badge parking and communal recreational facilities such as the gym and lounge area.

#### Deliveries and Servicing

- 9.134 Delivery and Servicing are proposed to take place from the street. A loading bay is proposed immediately at the front of the site adjacent to the 'market' lobby, which the applicant will fund delivery of through a highways agreement. This results in the loss of on-street parking bays, the revenue of which the applicant will need to cover, secured through the s.106 agreement.

#### Bin Storage

- 9.135 The proposal includes two specific bin storage areas to the rear of the site at ground level. A refuse area is provide for each of the two residential cores. Collection of refuse would be from the central access way off Edridge Road. The proposed arrangements would provide sufficient capacity for food, mixed dry recycling and landfill waste. Each of the two refuse areas are within 15 metres of the kerb and would be accessible for easy collection.

#### Hostile Vehicle Mitigation

- 9.136 The site is located on a relatively narrow one way street with on-street parking located on both sites. The existing character of the street therefore limits opportunity for hostile vehicles to gain speed to potentially access the site. Notwithstanding this, the public realm at the front of the site has been designed to create layers of physical components that provide a safe yet welcoming environment. These include level changes between the carriageway and footpath, landscaping including tree planting along the front boundary and the colonnade consisting of six columns positioned in front of the building entries

#### Sustainable Transport

- 9.137 Given that the development would be car-free, increased walking, cycling and public transport use is expected. The impact of additional development within the Croydon Opportunity Area, including the proposed development, is expected to require upgrades to existing services and therefore a sustainable transport contribution is to be secured in the s.106 agreement to mitigate the impacts of the development and secure improvements to include highway, tram or bus infrastructure.
- 9.138 Potential highway safety risks arising from informal crossing activity at the junction of Edridge Road and the Flyover have been raised by both officers and TFL. To address

this a financial contribution to prioritise the creation of a crossing on the A232 or other highway improvements that improve pedestrian safety has been suggested and subsequently welcomed and agreed by TFL. This will prioritise the delivery of the crossing, improvements to the existing crossing, prioritising footway works and highway safety measures.

- 9.139 In order to ensure that the identified modal shift is adequately supported, and barriers to uptake of more sustainable transport modes can be addressed, a Travel Plan and monitoring for three years is to be secured through the s.106 agreement.

## **Sustainable Design**

### Carbon Emissions

- 9.140 Policy SP6.2 requires new development to minimise carbon dioxide emissions, including that new dwellings (in major development proposals) must be zero carbon. As a minimum a 35% reduction in regulated carbon emissions over Part L 2013 is required, with the remaining CO<sub>2</sub> emissions to be offset through a financial contribution.
- 9.141 The policy also requires the development to incorporate a site wide communal heating system and to be enabled for district energy connection.
- 9.142 The scheme is expected to achieve at least a 37.14% reduction in on-site regulated emissions and up to 35.4% through a combination of energy demand reduction measures and the heat network. The remaining regulated CO<sub>2</sub> emissions shortfall would be covered by a carbon offset payment which would be secured through the S.106 agreement.
- 9.143 Whilst no existing district heating networks currently exist, the site is within an area where one is planned. The use of a CHP (Combined Heat and Power) was discouraged by the GLA in favour of alternative low carbon heating methods, such as an air source heat pump. However, such a system would not be compatible with a District Heating System, and as the Council is currently undertaking the business case work on the heat network, the preference of officers is for the building to be able to connect to the planned network. Space has been allowed in the plant room for the incoming pipe services from a future District Heating System and the proposed use of plate heat exchangers would allow future connection. A s.106 obligation is also recommended requiring connection to the District Heating System, or a feasibility into connection to a future system on first replacement of the heating plant. On that basis, as the proposal complies with the above requirements regarding carbon reduction and a CO<sub>2</sub> offset payment, subject to a condition requiring an updated energy strategy, the proposal is considered acceptable.
- 9.144 Policy SP6.3 requires a high standard of sustainable design and construction. The sustainability statement outlines a range of measures, such as fitting water efficient fittings, choosing materials with lower environmental impacts (Green Guide ratings of between A+ and D), the implantation of a waste minimisation strategy (including a take back scheme from supplies) and additional planting to enhance ecology on the site.
- 9.145 In order to ensure that the above measures are secured conditions are recommended. In addition S.106 obligations, in the form of a carbon offsetting



payment and the requirement to connect in the future to the planned district heating network shall also be secured.

#### Water Use

- 9.146 A planning condition is recommended to secure compliance with the domestic water consumption target of 105 litre/person/day, to ensure sustainable use of resources.

#### **Other Planning Issues**

- 9.147 The Health Impact Assessment outlines how elements of the building both promote and contribute to a healthier life style for both future residents and the wider community. The car free approach, provision of substantial cycle facilities, the use of environmentally friendly techniques together with comparatively high level of open space (both communal and private) within its urban context results in a development that promotes and contributes to a more healthy lifestyle.
- 9.148 A fire safety assessment was submitted as required by Policy D11 of the Draft London Plan. It identified how the scheme has been designed to ensure that appropriate fire safety measures have been incorporated into the building to minimise the risk of fire spread, ensure appropriate means of escape for residents and provided suitable and compliant access for firefighting equipment. This has been reviewed by our Building Control colleagues who have confirmed it is fit for purpose in the context of the emerging London Plan policy.
- 9.149 An initial TV and Radio signal impact assessment was submitted which identified that the proposal is unlikely to cause any interference to the reception of digital terrestrial television services or digital satellite television services. The assessment also concluded that as existing radio broadcast coverage is good in the area, the development is not expected to encode and or decode radio signals. Notwithstanding this and given the height and location of the proposed building, it is important to confirm these findings once the building is constructed. This will be secured via a s.106 obligation.
- 9.150 In order to ensure that the benefits of the proposed development (including those required to mitigate the harm caused) reach local residents who may be impacted indirectly or directly by the proposal's impacts, a skills, training and employment strategy (for the construction phase) and a contribution towards training are to be secured by s.106 obligations.
- 9.151 The development is liable for a Community Infrastructure Levy (CIL) payment to ensure that development contributes to meeting the need for physical and social infrastructure, including educational and healthcare facilities.

## **10 CONCLUSIONS**

- 10.1 The proposed development would introduce a significant amount of new housing, including a mix of unit sizes and genuinely affordable housing in the way of a significant number of London Affordable Rent units, as well as London Shared Ownership. The proposed development is of a high quality design and would ensure a good standard of accommodation for new residents and their neighbours. There would be harm to heritage assets, but that harm is considered to be minimised and necessary to deliver the development's benefits (and therefore is justified), and the harm caused would be outweighed by the development's public benefits. The

development would be a car-free, environmentally sustainable development and would comply with the aspirations of the Development Plan. The residual planning impacts would be adequately mitigated by the recommended s.106 obligations and planning conditions.

- 10.2 All other relevant policies and considerations, including equalities, have been taken into account.
- 10.3 It is recommended that planning permission is granted in line with the officer recommendation for the reasons summarised in this report.

## Appendix 1: Approved documents

### Plans:

| Drawing No | Plan Title                        | Revision |
|------------|-----------------------------------|----------|
| 077_PS_003 | Existing site location plan       |          |
| 077_PS_001 | Proposed Site Location Plan       | B        |
| 077_PS_002 | Proposed block plan               | B        |
| 077_PS_103 | Proposed ground Floor Plan        | E        |
| 077_PS_104 | Proposed first floor plan         | D        |
| 077_PS_105 | Proposed second floor plan        | D        |
| 077_PS_106 | Proposed third floor plan         | D        |
| 077_PS_107 | Proposed fourth floor plan        | C        |
| 077_PS_108 | Proposed fifth floor plan         | C        |
| 077_PS_109 | Proposed sixth floor plan         | C        |
| 077_PS_110 | Proposed seventh floor plan       | C        |
| 077_PS_111 | Proposed eighth floor plan        | C        |
| 077_PS_112 | Proposed ninth floor plan         | C        |
| 077_PS_113 | Proposed tenth floorplan          | C        |
| 077_PS_114 | Proposed eleventh floor plan      | B        |
| 077_PS_115 | Proposed twelfth floor plan       | C        |
| 077_PS_116 | Proposed thirteenth floor plan    | C        |
| 077_PS_117 | Proposed fourteenth floor plan    | C        |
| 077_PS_118 | Proposed fifteenth floor plan     | C        |
| 077_PS_119 | Proposed sixteenth floor plan     | C        |
| 077_PS_120 | Proposed seventeenth floor plan   | C        |
| 077_PS_121 | Proposed eighteenth floor plan    | C        |
| 077_PS_122 | Proposed nineteenth floor plan    | C        |
| 077_PS_123 | Proposed twentieth floor plan     | C        |
| 077_PS_124 | Proposed twenty-first floor plan  | C        |
| 077_PS_125 | Proposed twenty-second floor plan | C        |
| 077_PS_126 | Proposed twenty-third floor plan  | D        |
| 077_PS_127 | Proposed twenty-fourth floor plan | D        |
| 077_PS_128 | Proposed twenty-fifth floor plan  | D        |
| 077_PS_129 | Proposed twenty-sixth floor plan  | D        |
| 077_PS_130 | Proposed twenty-seventh floorplan | D        |
| 077_PS_131 | Proposed twenty-eighth floor plan | D        |
| 077_PS_132 | Proposed twenty-ninth floor plan  | D        |
| 077_PS_133 | Proposed thirtieth floor plan     | D        |
| 077_PS_134 | Proposed thirty first floor plan  | D        |
| 077_PS_135 | Proposed thirty second floor plan | D        |
| 077_PS_136 | Proposed thirty third floor plan  | D        |
| 077_PS_137 | Proposed thirty-fourth floor plan | D        |
| 077_PS_138 | Proposed roof terrace plan        | D        |
| 077_PS_200 | East elevation                    | F        |
| 077_PS_201 | North elevation                   | F        |
| 077_PS_202 | West elevation                    | E        |
| 077_PS_203 | South elevation                   | E        |

### Documents:

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|--|
| Air quality Assessment (Dated 11/12/2018 Version 3)                    |
| Archaeological Desk Based Assessment (Dated December 2018 Ref: R13423) |
| Contaminated Land Assessment (Dated December 2018 Ref: RPT-001)        |
| Construction Logistics Plan (Dated: November 2018)                     |

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| Daylight and Sunlight Internal (Dated: 28/11/2018 Ref: 13275)   |
| Daylight and Sunlight Neighbour (Dated 04/12/2018 Ref: 13275)   |
| Daylight and Sunlight Addendum letter (Dated 22/07/2019)  |
| Design and Access Statement (Dated December 2018)   |
| Design and Access Statement Addendum (Dated 28/01/2020)   |
| Design and Access Statement Addendum (Dated 27/02/2020)   |
| Delivery and Servicing Management (Dated December 2018)   |
| Drainage Strategy (Dated December 2018, Ref 0625 P2)  |
| Energy and Sustainability Statement V3 (Dated 11/12/2018)   |
| Energy and Sustainability Statement Addendum (Dated 31/01/2020)   |
| Fire Strategy Comments (Dated 28/11/2018)   |
| Flood risk assessment (Dated December 2018, Ref 0625 P2)  |
| Flood Risk addendum (Dated April 2019)  |
| Foul Sewage and Utilities Statement (Dated November 2018)   |
| Heritage Statement (Dated December 2018)  |
| Health Impact Assessment (Dated 15/04/2020)   |
| Hostile Vehicle Mitigation Strategy (Dated 19/02/2020)  |
| Paper on the impact of the interim windbreak on the amenity of residential units within Impact House (dated 27/02/2020) |
| Planning Statement (Dated December 2018)  |
| Planning Statement Addendum (Dated January 2020)  |
| Residential Travel Plan (Dated December 2018)   |
| TV and Radio Reception Impact Assessment (Dated 12/12/2018 Issue 1.0)   |
| Transport Statement (Dated December 2018)   |
| Wind Microclimate Assessment (Dated 10/12/2018)   |
| Wind – Pedestrian Level Wind Microclimate Assessment (Dated 27/03/2019)   |
| Wind – Follow up letter (Dated 24/01/2020)  |
| Updated Economic Viability Appraisal Report (Dated December 2018)   |
| ULL – Letter (Dated 29/08/2019)   |
| Gerald Eve FRA Addendum Response (Dated 24/10/2019)   |

## **Appendix 2: Planning Policies and Guidance**

The following lists set out the most relevant policies and guidance, although they are not exhaustive and the provisions of the whole Development Plan apply (in addition to further material considerations).

### **London Plan (2016)**

- Policy 1.1 Delivering the strategic vision and objectives for London
- Policy 2.1 London in its global, European and United Kingdom context
- Policy 2.2 London and the wider metropolitan area
- Policy 2.3 Growth areas and co-ordination corridors
- Policy 2.6 Outer London: vision and strategy
- Policy 2.7 Outer London: economy
- Policy 2.8 Outer London: transport
- Policy 2.15 Town centres
- Policy 2.18 Green Infrastructure
- Policy 3.1 Ensuring equal life chances for all
- Policy 3.2 Improving health and addressing health inequalities
- Policy 3.3 Increasing housing supply
- Policy 3.4 Optimising housing potential
- Policy 3.5 Quality and design of housing developments
- Policy 3.6 Children and young people's play and informal recreation facilities
- Policy 3.7 Large residential developments
- Policy 3.8 Housing choice
- Policy 3.9 Mixed and balanced communities
- Policy 3.10 Definition of affordable housing
- Policy 3.11 Affordable housing targets
- Policy 3.12 Negotiating affordable housing on individual private residential and mixed use schemes
- Policy 3.13 Affordable housing thresholds
- Policy 3.15 Co-ordination of housing development and investment
- Policy 4.1 Developing London's economy
- Policy 4.7 Retail and town centre development
- Policy 4.8 Supporting a successful and diverse retail sector and related facilities and services
- Policy 4.12 Improving opportunities for all
- Policy 5.1 Climate change mitigation
- Policy 5.2 Minimising emissions
- Policy 5.3 Sustainable design & construction
- Policy 5.7 Renewable energy
- Policy 5.8 Innovative energy technologies
- Policy 5.9 Overheating and cooling
- Policy 5.10 Urban greening
- Policy 5.11 Green roofs and development site environs
- Policy 5.12 Flood risk management
- Policy 5.13 Sustainable drainage
- Policy 5.14 Water quality and wastewater infrastructure
- Policy 5.15 Water use and supplies
- Policy 5.16 Waste net self-sufficiency
- Policy 5.17 Waste capacity
- Policy 5.18 Construction, excavation and demolition waste
- Policy 5.21 Contaminated land
- Policy 6.1 Strategic approach

- Policy 6.2 Providing public transport capacity and safeguarding land for transport
- Policy 6.3 Assessing effects of development on transport capacity
- Policy 6.4 Enhancing connectivity
- Policy 6.5 Funding Crossrail and other strategically important transport infrastructure
- Policy 6.7 Better streets and surface transport
- Policy 6.9 Cycling
- Policy 6.10 Walking
- Policy 6.11 Smoothing traffic flow and tackling congestion
- Policy 6.12 Road network capacity
- Policy 6.13 Parking
- Policy 7.1 Lifetime neighbourhoods
- Policy 7.2 An inclusive environment
- Policy 7.3 Designing out crime
- Policy 7.4 Local character
- Policy 7.5 Public realm
- Policy 7.6 Architecture
- Policy 7.13 Safety, security and resilience to emergency
- Policy 7.14 Improving air quality
- Policy 7.15 Reducing noise and enhancing soundscapes
- Policy 7.19 Biodiversity and access to nature
- Policy 7.21 Trees and woodlands
- Policy 8.1 Implementation
- Policy 8.2 Planning obligations
- Policy 8.3 Community infrastructure levy

## **Emerging New London Plan**

- SD1 Opportunity areas
- SD6 Town centres and high streets
- SD7 Town centres: development principles and development plan documents
- SD10 Strategic and local regeneration
- D1 London's form, character and capacity for growth
- D2 Infrastructure requirements for sustainable densities
- D3 Optimising site capacity through the design-led approach
- D4 Delivering good design
- D5 Inclusive design
- D6 Housing quality and standards
- D7 Accessible housing
- D8 Public realm
- D9 Tall buildings
- D11 Safety, security and resilience to emergency
- D12 Fire safety
- D13 Agents of change
- D14 Noise
- H1 Increasing housing supply
- H4 Delivering affordable housing
- H5 Threshold approach to applications
- H6 Affordable housing tenure
- H10 Housing size mix
- S1 Developing London's social infrastructure
- S4 Play and informal recreation
- E11 Skills and opportunities for all
- HC1 Heritage conservation and growth

- G1 Green infrastructure
- G4 Open space
- G5 Urban greening
- G6 Biodiversity and access to nature
- G7 Trees and woodlands
- SI1 Improving air quality
- SI2 Minimising greenhouse gas emissions
- SI3 Energy infrastructure
- SI4 Managing heat risk
- SI5 Water infrastructure
- SI6 Digital connectivity infrastructure
- SI7 Reducing waste and supporting the circular economy
- SI12 Flood risk management
- SI13 Sustainable drainage
- T1 Strategic approach to transport
- T2 Healthy streets
- T3 Transport capacity, connectivity and safeguarding
- T4 Assessing and mitigating transport impacts
- T5 Cycling
- T6 Car parking
- T6.1 Residential parking
- T6.3 Retail parking
- T7 Deliveries, servicing and construction
- T9 Funding transport infrastructure through planning
- DF1 Delivery of the plan and planning obligations

## **Croydon Local Plan (2018)**

### Strategic Policies

- Policy SP1: The Places of Croydon
- Policy SP2: Homes
- Policy SP3: Employment
- Policy SP4: Urban Design and Local Character
- Policy SP6: Environment and Climate Change
- Policy SP7: Green Grid
- Policy SP8: Transport and Communication

### Development Management Policies

- Policy DM1: Housing choice for sustainable communities
- Policy DM4: Development in Croydon Metropolitan Centre, District and Local Centres
- Policy DM8: Development in edge of centre and out of centre locations
- Policy DM10: Design and character
- Policy DM11: Shop front design and security
- Policy DM13: Refuse and recycling
- Policy DM14: Public Art
- Policy DM15: Tall and Large Buildings
- Policy DM16: Promoting Healthy Communities
- Policy DM17: Views and Landmarks
- Policy DM18: Heritage assets and conservation
- Policy DM23: Development and construction
- Policy DM24: Land contamination

- Policy DM25: Sustainable Drainage Systems and Reducing Flood Risk
- Policy DM27: Protecting and enhancing our biodiversity
- Policy DM28: Trees
- Policy DM29: Promoting sustainable travel and reducing congestion
- Policy DM30: Car and cycle parking in new development
- Policy DM33: Telecommunications

#### Place-specific policies

- Policy DM38: Croydon Opportunity Area

### **Supplementary Planning Guidance (SPG) / and Documents (SPD)**

#### London

- Culture and Night-Time Economy (November 2017)
- Affordable Housing & Viability (August 2017)
- Crossrail Funding (March 2016)
- Housing (March 2016)
- Accessible London: Achieving an Inclusive Environment (October 2014)
- The control of dust and emissions during construction and demolition (July 2014)
- Town Centres (July 2014)
- Character and Context (June 2014)
- London Planning Statement (May 2014)
- Sustainable Design and Construction (April 2014)
- Play and Informal Recreation (September 2012)
- All London Green Grid (March 2012)
- London View Management Framework (March 2012)
- London's Foundations (March 2012)
- Planning for Equality and Diversity in London (October 2007)

#### Croydon

- Croydon Opportunity Area Planning Framework 2013 (adopted by the Mayor and Croydon)
- Designing for community safety SPD
- SPG 12: Landscape design
- Public Realm Design Guide 2019
- Section 106 Planning Obligations in Croydon and their Relationship to the Community Infrastructure Levy– Review 201



## **Appendix 3: BRE Guidance Terms**

### Daylight to existing buildings

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

- the vertical sky component (VSC) measured at the centre of an existing main window is less than 27%, and less than 0.8 times its former value (or reduced by more than 20%) known as “the VSC test” or
- the area of the working plane in a room which can receive direct skylight is reduced to less than 0.8 times its former value known as the “daylight distribution” (DD) test.

### Sunlight to existing buildings

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

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

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

### Daylight to new buildings: Average Daylight Factor (ADF)

The ADF test calculates the average illuminance within a room as a proportion of the illuminance available to an unobstructed point outdoors, under a sky of known illuminance and luminance distribution.

The BRE Guidelines stipulate that kitchens should attain at least 2% ADF, living and dining rooms at least 1.5% ADF and bedrooms at least 1% ADF.

### Sunlight to gardens and outdoor spaces

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