

**1 SUMMARY OF APPLICATION DETAILS**

Ref: 20/02020/FUL  
 Location: 443A Brighton Road, South Croydon CR2 6EU  
 Ward: South Croydon  
 Description: Demolition of existing buildings and the redevelopment of the site to provide a residential led, mixed-use, development comprising of up to 79 residential units (C3), 398 sqm GIA flexible commercial space (B1b, B1c and D1), with building heights ranging between 4, 6 and 8 storeys, associated parking and landscaping, and all necessary ancillary and enabling works.  
 Approved Documents: See Appendix 1  
 Applicant: Brighton Road (443a) Ltd  
 Agent: Icen Projects  
 Case Officer: Scott Schimanski

	1 bed	2 bed	3 bed	Total
	2p	4p	4p	
<b>Market Housing</b>	19	28	7	54
<b>Affordable Rent</b>	7	4	2	13
<b>Intermediate</b>	6	6	0	12
<b>All Tenures</b>	<b>32</b>	<b>38</b>	<b>9</b>	<b>79</b>

Number of car parking spaces	Number of cycle parking spaces
25 car parking / 4 Blue Badge	144 plus 18 short stay

1.1 This application is being reported to Planning Committee in accordance with the Committee consideration criteria: Number of objections and referred to Planning Committee by a Ward Councillor.



## 2 BACKGROUND

2.1 An earlier iteration of this proposal was presented to the Planning Committee at pre-application stage on 6 November 2019. This proposed the redevelopment of the site to provide a residential led, mixed-use, development comprising 75 residential units (C3) and 338sqm GIA of flexible commercial space (B1b, B1c and D1), with building heights ranging between 4 and 7 storeys, associated parking and landscaping, and all necessary ancillary and enabling works.

2.2 The main issues raised by committee members were as follows:

- Height – A few Members supported an extra floor rising to 8 storeys on the corner to improve the appearance of the building particularly if this could improve the affordable offer on site. However other Members were not in favour of the extra increase in height.
- Design and Massing – Members were supportive for the greater use of materials to help break the massing of the facade. Some concern around the use of red brick.
- Parking – Members were undecided on whether the quantum of parking was enough. Though there was consensus that should there be more car parking space on the site, it should not compromise the design of the landscaping/communal garden. It should be demonstrated that vehicles can service the commercial units without affecting the flow of traffic on Brighton Road.
- Commercial Space – Members welcomed the commercial space which would create an active frontage but want to be assured that there would be a demand for it.
- Three bed units – Members felt that there should be more three bedroom units in the scheme and noted that none of the proposed three bed units are proposed to be affordable.
- Windows – Members would like to see improvements to the south west frontage windows by which they could be made larger. Members were also concerned about the overlooking of surrounding residents in relation to the design of balconies to be considered.
- Winter Gardens – Members welcomed the winter gardens but noted that the majority were accessed from bedrooms and it would be better if they were accessed from living areas.
- Air Quality – Members noted that the location did not have the best air quality and welcomed the winter gardens. Members would also like to see other design techniques which could be used to improve air quality for the occupants.
- Landscaping – Members highlighted the importance that the correct species were specified so they survive in the landscape court yard as some areas of the site do not get any daylight.
- Colonnades – Mixed views were expressed about whether the colonnade would create a security issue, with one Member voicing concerns on this issue.

2.3 The scheme was presented to the Place Review Panel (PRP) on 15<sup>th</sup> August 2019 at pre-application stage. The main issues raised by the Panel were as follows:

- The building line of the development should be set back to line up with the historic building line and give the important existing street trees the space they need to grow.
- The proposed height requires further townscape justification. Additional height may be acceptable.

- Public access into the development is not recommended.
- The colonnade at the front of the development is not acceptable.
- The stepping in of the south-western corner is not supported.
- There needs to be more certainty regarding the viability of the proposed commercial use of the ground floor. Maisonettes may be a more reliable way of ensuring active frontages.
- The development should be extended closer to the northern boundary.
- Exploration of relocating the car-parking along the northern frontage to the rear of the development.
- A continuous footway along Brighton Road is necessary.
- The entrances should be more prominent
- The landscape strategy requires further development
- The roof scape design requires development

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

- 1) 30% Affordable Housing provision (52% London Affordable Rent, 48% London Shared Ownership)
- 2) Affordable Housing review mechanism (early stage review) and nominations agreement
- 3) Air quality contribution of £8,000
- 4) Local employment and training strategy (construction) including a financial contribution of £60,415.64
- 5) Zero Carbon off-set contribution (currently £113,340 dependant on final energy strategy)
- 6) Future connection to planned district energy scheme
- 7) Sustainable transport contributions (£92,000)
- 8) Car parking permit free restriction for future residents and CPZ study
- 9) Travel Plan and monitoring
- 10) Provision of two on site car club spaces and membership for new residents
- 11) Electric Vehicle Charging Point provision
- 12) Public realm and highway works
- 13) Retention of scheme architects (or suitably qualified alternative architect)
- 14) Monitoring fees and payment of legal fees
- 15) 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) Demolition Logistics Plan (prior to commencement)
- 7) Construction Logistic Plan (prior to commencement)
- 8) A footways condition survey (prior to commencement)
- 9) Contamination (prior to commencement)
- 10) Detailed Surface Water Drainage Scheme (prior to commencement)
- 11) Details of protection of water (Thames Water) infrastructure (prior to commencement)
- 12) TV/Radio reception baseline survey (prior to commencement)
- 13) Public art (prior to commencement)
- 14) 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)
- 15) External facing materials, including physical samples and detailed drawings of design elements – including interim wind break (prior to superstructure)
- 16) Outdoor seating (prior to occupation)
- 17) Flues and Ventilation (prior to occupation)
- 18) Hard and soft Landscaping (prior to occupation)
- 19) Security features (CCTV, lighting, access controls)
- 20) Façade maintenance and cleaning strategy (prior to occupation)
- 21) Landscape management plan (prior to occupation)
- 22) Playspace (prior to occupation)
- 23) Public Realm and External Building Lighting (prior to occupation)
- 24) Delivery and Servicing Management Plan (prior to occupation)
- 25) Car Park management plan (prior to occupation)
- 26) Refuse storage (prior to occupation)
- 27) Hard and Soft Landscaping details of Public Realm, Green Roof and Children's Play Spaces (prior to occupation)
- 28) Piling (prior to specific works)
- 29) Water use (compliance)
- 30) Use Classes (compliance)
- 31) Noise limits (plant) (compliance)
- 32) Secured by design (compliance)
- 33) Accessible Homes (M4) (compliance)
- 34) Lifts (compliance)
- 35) Electric charging (compliance)
- 36) Cycle Storage (compliance)
- 37) Submitted Air Quality assessment (compliance)
- 38) 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, 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

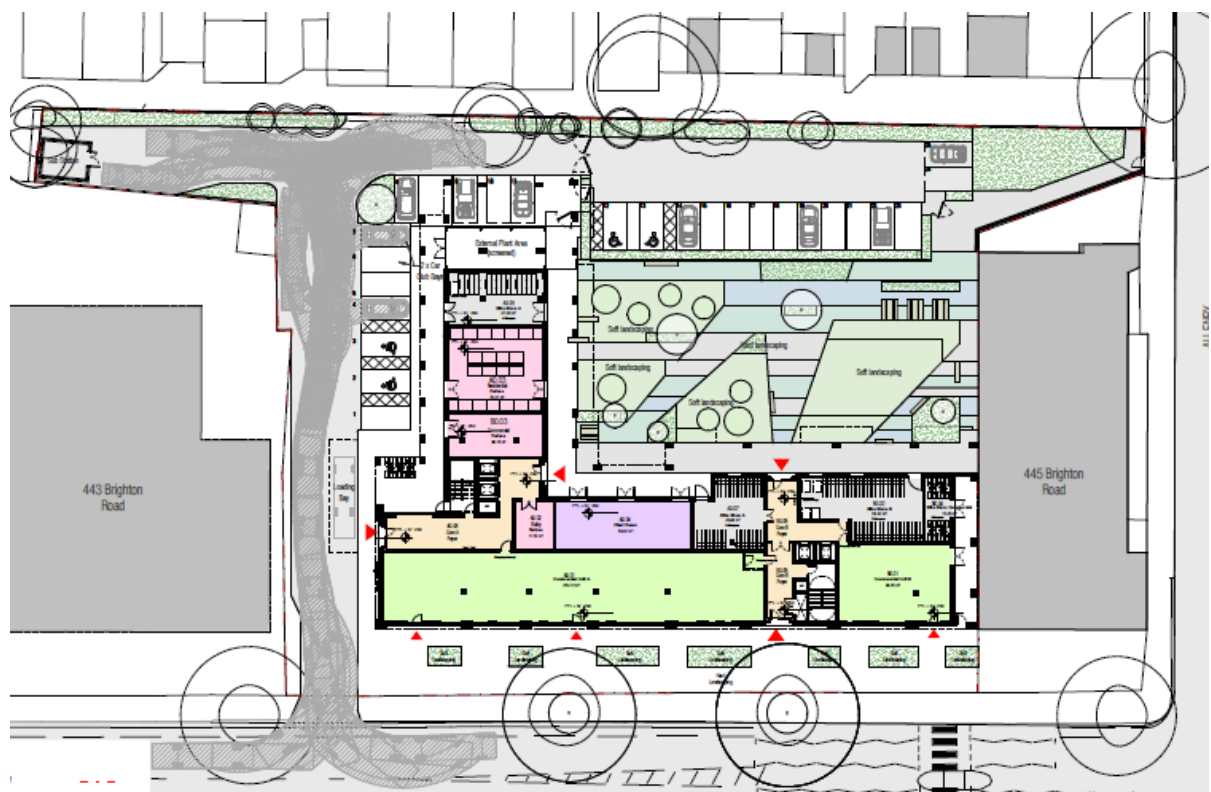


Image 1: Proposed Site Plan

4.1 A residential-led development is proposed on land located on the eastern side of Brighton Road (A235), near the junction with Allenby Avenue which would consist of the following:

- a single 'L' shaped part 4, 6 and 8 storey mixed used building containing a total of 79 residential homes and 398sqm of flexible commercial/educational floor space.
- A total of 25 Affordable units (30% by habitable room), consisting of 12 (48%) shared ownership (intermediate) units and 13 (52%) London Affordable Rent units, located across the building.
- The building would have two entrance cores, one with 30 residential units, the other with 49 units.



- The building would be distinctly residential with a contemporary appearance with a material palette of reddish and pale brick and metal feature work and balustrades
- 25 vehicle parking spaces, including 4 blue badge spaces and 2 car club spaces. A designated commercial loading bay and areas for residential deliveries are also proposed within the onsite vehicle access routes. Cycle and bin storage areas are proposed within the building at ground level.
- a large square of communal landscaped area to the rear that is directly accessed from the two entry cores, the parking spaces and also from a pedestrian access point proposed for the south-eastern corner of the site. To the front of the building will also be a new area of landscaped public realm located between the new commercial units and Brighton Road.



*Image 2 - Site and surrounds*

- 4.2 The proposal has been amended since it was originally submitted. Amendments related to the layout of the service and deliveries areas, the number of cycle spaces and number and location of on-site car club spaces. The alterations will result in a safer and more efficient access and service area within the site and improved access for residents and nearby residents of more sustainable transport options.

### **Site and Surroundings**

- 4.3 The 0.42 hectare site is located on Brighton Road midway between Croydon Metropolitan Centre and Purley and is currently used as a car showroom with ancillary service (workshop and offices) functions (Sui Generis) with vast amounts of hardstanding for the display of vehicles. Policy SP3 of the Croydon Local Plan 2018 (CLP) classifies the site as a 'scattered employment site' (Tier 4) and the site is also within an Area of Focussed Intensification. Directly to the north of the site is another car showroom and to the south a three-four storey building which accommodates a

church/community facility. To the east of the site are two storey terraced dwellings located on Grange Road, and the opposite side of Brighton Road is also characterised by two storey dwellings.



Image 3: Location Plan and photos of the existing buildings on site

- 4.4 The site's Public Transport Accessibility Level (PTAL) is 3 (moderate on a scale of 0-6b, where 6b is the most accessible). The site is well served by public transport, within walking distance of Purley Oaks station and a number of bus routes along Brighton Road a Classified Road.
- 4.5 The site is not in a Conservation Area and there are no heritage assets on the site, nor directly adjoining. The site is within an Archaeological Priority Area (APA), is within Flood Zone 3 and the whole borough is an Air Quality Management Area (AQMA).

### Planning History



- 4.6 In 1988 planning permission was **granted** for the use of the site as a car showroom and workshop (ref.88/01739/P).
- 4.7 Pre-application (ref. 19/02988/PRE) for proposed redevelopment of the site to provide a residential led, mixed-use, development comprising 75 residential units (C3) and 338sqm GIA of flexible commercial space (B1b, B1c and D1), with building heights ranging between 4 and 7 storeys, associated parking and landscaping, and all necessary ancillary and enabling works.



*Image 4: Front elevation of pre-application scheme*

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

- 5.1 The site is located within an area identified for intensification for both residential and commercial uses. The proposed 79 new homes would make a significant contribution to housing delivery in the borough.
- 5.2 30% of the proposed homes (by habitable room) would be affordable housing, of which 52% would be London Affordable Rent. The remainder 48% would be intermediate London Shared Ownership.
- 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 new dwellings would provide good quality accommodation. The height and appearance of the of the proposed building is not expected to result in harm to the surrounding character of the locality nor is the scheme in terms of siting and unit layout likely to have any unreasonable impact upon nearby residential properties in terms of outlook, privacy, noise or access to suitable levels of daylight and or sunlight. The scheme as proposed is considered to be compliant with relevant policy and any impacts associated with the scheme are considered to be outweighed by the public benefits provided in the form of new housing and affordable housing and also improvements to the appearance and character of the locality. 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:



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

No objection with regards to archaeological issues and no specific conditions are considered necessary.

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

6.3 TFL raised no objection to the proposal, however some minor concerns with the schemes ability to comply with transport policies of the London Plan were raised. The following issues were raised:

- A minimum of 25% of the parking spaces should have active provision of electric vehicle charging points with the remainder equipped with passive provision.
- Cycle parking should comply with guidance set out within the London Cycle Design Standard and all short stay spaces should be provided within the public realm and easily accessible to visitors while long stay spaces should be provide within a secure area.
- A Stage 1 Road Safety Audit should be submitted in line with the Mayors Vision Zero Target.
- A review of the existing pedestrian and cycle routes to key destinations to demonstrate compliance with the Healthy Streets indicators be undertaken.
- A full Construction Logistic Plan should be provided in accordance with TFL's published guidance.
- All delivery and servicing activity should be carried out on site. A full delivery and servicing plan should be secured by condition.

(OFFICER COMMENT: The proposal includes details demonstrating that quantum and location of cycle storage facilities accord with London Plan policy and also that 25% of vehicle parking spaces would have active provision of electric charging points. The location of the site close to the Purley Oaks station and access to a large number of bus routes along Brighton Road would provide opportunity for future residents to make more journeys on foot or by bicycle in line with healthy streets initiatives. A full Construction Logistic Plan, Stage 1 Road Safety Audit together with a Delivery and Servicing Plan would be conditioned)

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

6.4 LLFA raised no objection to the scheme subject to the implementation of suggested mitigation measures outlined within the flood assessment report.

### **Designing Out Crime Officer**

6.5 No objection received, however a Secured by Design accreditation would be recommended by way of condition.

### **Thames Water**

6.6 No objection with regards to waste water network, sewage treatment works or water network infrastructure. With regards to surface water drainage, subject to following the sequential approach no objection is raised. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water is required. In addition, informatives relating to protection of assets and discharges into public sewer are recommended. Further, the applicant is advised that their development boundary

falls within a Source Protection Zone for groundwater abstraction. These zones may be at particular risk from polluting activities on or below the land surface. The applicant is encouraged to rear the Environment Agency's approach to groundwater protection. (OFFICER COMMENT: The recommendation includes the Thames Water informative).

## 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: 143 Objecting: 143 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:

Summary of objections	Response
<i>Townscape and character - Scale and massing</i>	
The buildings would be an overdevelopment of the site.	The proposal in terms of setbacks, scale, massing and density would be consistent with the approach taken for sites located within an area of focussed intensification. Specific details of how the building would fit into its surroundings are discussed in detail within Section 9.38 to 9.47. Density is discussed within Sections 9.20 to 9.21.
The proposed building would be out of character with the locality	The acceptability of the proposal in terms of town scape and setting is discussed in detailed within Sections 9.38 to 9.47.
<i>Amenity Impacts - Privacy, Daylight and Sunlight</i>	
The proposed building will overlook neighbouring dwellings	A minimum separation of 29 metres is proposed between windows/balconies, a distance that is considered appropriate for such an urban environment. Amenity impacts are discussed in detailed within Sections 9.62 to 9.65.
The development would result in loss of daylight and sunlight to nearby dwellings	A sunlight and daylight assessment was submitted which demonstrates acceptable impacts on properties that surround the site. This is discussed in detail within Section 9.54 to 9.61.
Noise	
The building works will be noisy and affect nearby residents	The building works will be temporary, and subject to conditions to limit inconvenience to neighbours and the highway network.
<i>Traffic, Transport and Parking</i>	

Insufficient on-site parking has been provided and would result in additional pressure on on-street parking availability in the surrounding street network	The proposed on-site parking spaces accord with London Plan policy in terms of quantum and type. Vehicle parking and access is discussed in detailed within Sections 9.78 to 9.85.
Additional traffic movements would result in reduced traffic safety and pollution on surrounding road network	The impacts upon traffic congestion have been discussed within Sections 9.72 to 9.87.
Disruption during construction	
Other issues	
<p>Lack of consultation from developer/applicant</p> <p>Unsuitable land use. The area should be used for commercial activities not residential</p> <p>Impact upon infrastructure in area</p> <p>Poor quality of accommodation and Insufficient facilities for future residents</p> <p>Increase in waste and rubbish</p> <p>Inadequate landscaping and Impact upon trees</p>	<p>All neighbouring properties (93 in total) were consulted by letter about the proposed development. Site notices were also placed at the front of the site and a press notice was also issued in the local press.</p> <p>The principle of the proposed development including land uses have been discussed within Section 9.2 to 9.11.</p> <p>The proposal includes a number of sustainable transport methods to reduce car dependency and impacts upon road infrastructure and encourage the use of passive transport methods (cycling and walking) and public transport. If approved, the proposal would also be liable for a Community Infrastructure Levy. A levy to help fund infrastructure improvements within the wider community.</p> <p>The quality of accommodation (including on site facilities) has been discussed in detail within Section 9.22 to 9.36</p> <p>The proposed development includes waste facilities (refuse and recycling) for both the commercial and residential elements of the scheme. To ensure that meet with Council requirements, a condition requiring specific details and a waste management plan will be included on any consent issued for the site.</p> <p>The proposal includes extensive landscaping throughout the site. Tree removal on site is minimal and suitable tree replacement is proposed to mitigate the loss of trees on site.</p>

Decrease employment opportunities	The proposal includes 398sqm of employment generating floor space thereby maintaining employment floor space on the site.
Inadequate Housing mix and insufficient affordable housing Provision	The quantum of unit types and level of affordable Housing is discussed in detail within Section 9.12 to 9.18.
Inadequate Fire Safety measures	The application was referred to London Fire Brigade who raised no objection to the proposed scheme.
<u>Non-material planning considerations</u>	
Mental health and well-being of people residing in flats	The proposed development is expected to provide high quality residential accommodation that accords with relevant standards in terms of size and layout. The quality of accommodation is discussed in detail within Section 9.22 to 9.36.

Cllr Simon Hoar (Ward Councillor) objected to the proposal and referred the application to committee. Concerns raised by the Councillor were:

- Overdevelopment and over dominance of the proposed building.
- Loss of privacy.
- Out of keeping with the area in terms of height and design.
- Insufficient parking.

## **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
- 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 and other considerations

#### **Principle of development**

##### *Use of the site for residential purposes*

- 9.2 This application must be considered against a backdrop of significant housing need, not only across Croydon, but also across London and the south-east. All London Boroughs are required by the London Plan to deliver a number of residential units within a specified plan period. In the case of the London Borough of Croydon, there is a requirement to deliver a minimum of 32,890 new homes between 2016 and 2036 (Croydon’s actual need identified by the Croydon Strategic Housing Market Assessment would be an additional 44,149 new homes by 2036, but as there is limited developable land available for residential development in the built up area, it is only possible to plan for 32,890 homes). This requirement is set out in policy SP2.2 of the Croydon Local Plan (CLP) (2018), which separates this target into three relatively equal sub targets with 10,760 new homes to be delivered within the Croydon Opportunity Area, 6,970 new homes as identified by specific site allocations for areas located beyond the Croydon Opportunity Area boundary and 10,060 homes delivered across the Borough on windfall sites. The draft London Plan, which is

moving towards adoption (although in the process of being amended) proposes increased targets which need to be planned for across the Borough, but the windfall amount of housing is broadly similar (if slightly higher) than the Croydon Local Plan figures. In order to provide a choice of housing for people in socially-balanced and inclusive communities in Croydon, the Council will apply a presumption in favour of sustainable development of new homes.

- 9.3 The site is located within the Brighton Road (Sanderstead Road) Intensification Area, as outlined within Policy DM10.11 of the Croydon Local Plan (CLP) and Chapter 3 of the Suburban Design Guide (SDG) 2019.
- 9.4 Section 3.11 of the SDG outlines that redevelopment in the Intensification Area should deliver increased housing density, supported by an active and vibrant local centre of mixed uses and recreation areas in conjunction with the existing recreation ground. Section 3.14 further states that large, underutilised sites provide potential for the creation of mixed-use developments. These may include active frontages along Brighton Road, with associated public realm improvements. Development should seek to significantly intensify the area through the development of flats and increased heights. The height of new development should respond to the context and streetscene. Heights should therefore vary from 3 to 6 storeys. Development facing onto Brighton Road may seek to be up to 6 storeys tall.
- 9.5 Policy DM10.11 of The Local Plan 2018 further outlines that new development in areas of focussed intensification may be significantly larger than existing and should be double the predominant height of buildings in the area. Development should further take the form of one of three different character types; “Medium rise block with associated grounds”, “Large buildings with spacing”, or “Large buildings with Continuous frontage line”. The use of the site for residential purposes together with the overall height, long frontage to Brighton Road and overall layout of the development generally accords with policies relating to areas of focussed intensification and as such is an acceptable land use on the site.

#### *Commercial Floor Space*

- 9.6 The site is a Tier 4 site (Policy SP3 - Table 5.1 of CLP) and currently used as a Peugeot car showroom which, combined with the ancillary car repair works, is classified as a Sui Generis land use, a use that is not protected by Policy SP3 as it falls outside the scope of the constraints of the employment policy (not protected by Tier 4 status).
- 9.7 Within Tier 4 sites, permitted uses include Class B1 (excluding B1a office), B2 and B8 uses, employment generating sui-generis uses and Class D1 (Education and Community Facilities).
- 9.8 To preserve employment opportunities on the site, the proposed development includes 398sqm of flexible commercial floor space (B1b, B1c and D1) at ground level which would replace the 467sqm of Sui Generis floor space. It is expected that this level of commercial floor space that would front Brighton Road would create between 9 and 11 jobs. Although the units have not been designed to a specific occupier, they have been designed to be flexible in terms of future occupants. The applicant intends to retain these units and to encourage suitable tenants that would contribute to the economic wellbeing of the area, they intend to fit out the units including toilet and kitchen facilities, CCTV and phone & broadband service.

- 9.9 An Employment and Marketing Strategy formed part of the submission documents and outlines specific details of how the proposed commercial floor space would preserve the sites employment floor space and its contribution to overall economic development of the area.
- 9.10 Therefore, the principle of using the ground floor for B1b, B1c or D1 uses is acceptable as these uses are permitted land uses on Tier 4 sites and the amount of floorspace is appropriate being moderately below the existing floorspace level and with clear measures in place to ensure that the proposed units are attractive to future occupiers.
- 9.11 Overall, the erection of a medium density mixed use (commercial and residential development) is acceptable in principle, subject to compliance with the other Local Plan policies.

### **Affordable Housing**

- 9.12 The London Plan (Policies 3.10-3.13) requires Boroughs to seek to maximise affordable housing provision. The Croydon Local Plan (2018) sets out a minimum level of affordable housing on sites with ten or more dwellings, such as this scheme. The CLP (2018) states that the Council will negotiate to achieve up to 50% affordable housing, subject to viability and will seek a 60:40 ratio between affordable rent homes and intermediate (including shared ownership) homes unless there is an agreement with a Registered Provider that a different tenure split is justified. There is a minimum requirement of affordable housing (all subject to viability) to be provided either as:
- 30% affordable housing on the same site as the proposed development; or
  - 15% if the site is in the District Centre and 15% affordable housing on a donor site with prior planning permission within the same place as the District Centre; or
  - 15% affordable housing on the same site as the proposed development plus a Review Mechanism entered into for the remaining affordable housing (up to the equivalent of 50% overall provision through a commuted sum based on a review of actual sales values and build costs of completed units) provided 30% on-site provision is not viable, construction costs are not in the upper quartile and there is no suitable donor site.
  - The policy states that anything offered below any of these requirements would be refused.
- 9.13 This approach is supported by the Mayor's Affordable Housing and Viability Supplementary Planning Guidance (SPG) (2017), which contains guidance for LPAs assessing affordable housing offers and viability appraisals. Provision of affordable housing is of critical importance in Croydon borough, where, despite policy requirements, in reality around 91% of new homes need to be affordable for residents on lower incomes. Of particular importance within this is the provision of affordable rented homes, which is reflected in the wording of the policy.
- 9.14 The proposal is for 79 flats. As submitted, the application proposes 32% affordable housing based on units and 30% based on habitable rooms.

- 9.15 The proposed tenure split is 48% London Affordable Rent (LAR) and 52% shared ownership. Although this deviates significantly from Council's preferred 60:40 split, the applicant has stated that the higher proportion of shared ownership units is necessary to deliver a viable scheme. The mix and tenure split is also supported by the two Registered Providers (RPs) that were approached. Evidence supporting this has been provided within the submitted Viability Statement prepared by Turner Morum.
- 9.16 Notwithstanding the abovementioned offer of 30%, as the scheme does not propose 50% Affordable Housing, CLP Policy SP2.5 requires a viability report be submitted to demonstrate that such a provision is not possible. A Financial Viability Assessment (VFA) was submitted and independently reviewed. The review broadly agreed with the assessment figures provided within the FVA and concluded that a full policy compliant affordable housing provision is not possible and that the scheme could only provide a lower quantum of affordable housing than has been offered.
- 9.17 As it stands, the local planning authority is satisfied with the proposed offer of 30% Affordable Housing as the applicant has demonstrated that they have engaged with RPs in order to maximise the provision of affordable units on the site. The proposed mix meets with the needs of both RPs that were approached and it is a greater quantum of affordable housing than the scheme can viably provide. As such, taking all matters into account the application meets the policy requirements of Policies 3.10-3.13 of the London Plan and Policies SP2.4 and SP2.5 of the Croydon Local Plan (2018).

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

### Housing Mix

- 9.18 Policy SP2.7 seeks to ensure that a choice of homes is available to address the borough's need for homes of different sizes and that this will be achieved by setting a strategic target for 30% of all new homes up to 2036 to have three or more bedrooms. Policy DM1.1 requires a minimum provision of homes designed with 3 or more bedrooms on sites of 10 or more dwellings. In urban settings with PTALs of 3, the requirement is 60% 3+ bedroom units. The policy goes on to say that the only exceptions to this would be where there is an agreement with a Registered Provider that three bedroom dwellings are not viable or required as part of the affordable housing offer, or where viability demonstrates that larger homes would not be viable, two bedroom four person homes could be considered as family units (within three years of adoption of the CLP).
- 9.19 As outlined in the table at the beginning of this report, there are 9 x three bedroom units provided in the scheme, equating to 12% of units and 38 2-bedroom 4-person units, which equate to 60% on units overall. The unit mix has also been agreed with an RP who have stipulated their requirement for a mix of 1, 2 and 3 bedroom units to achieve a balanced and sustainable community. Although the mix does not provide 60% three bedroom units, overall it would result 60% of units being suitable for family accommodation and would also introduce much needed family size units on the site as desired by the sites location within the intensification zone.

### Housing Density



- 9.20 The site has an urban setting with a PTAL rating of 3 and as such, Table 3.2 of the London Plan indicates that the density levels ranges of 200 - 450 habitable rooms per hectare (hr/ha) with an expectation of no more than 170 units per/hectare. Treating the combined living/kitchen/dining areas as a single habitable room, the proposed density of development would equate to around 510 habitable rooms per hectare and 188 units per hectare.
- 9.21 As Members will be aware, the London Plan indicates that it is not appropriate to apply these ranges mechanistically, as the density ranges are broad, to enable account to be taken of other factors relevant to optimising potential – such as local context, design and transport capacity. As such, it is of relevance that the site is located within an area identified for intensification midway between Purley and Croydon centres, is located within 100 metres of PTAL 4 and is also within easy walking distance (200m) to the Purley Oaks train station. Because of these factors, it is not unreasonable to expect the site capable of accommodating density's somewhat more consistent with that of an urban site with a higher PTAL rating (200 to 700 hr/ha or up to 260 units/ha). Based on this scenario, the proposed density level is not in itself unreasonable.

#### Quality of Accommodation

- 9.22 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.
- 9.23 The proposed building would have two legible and well-designed entrances (cores) for residents, with overlooked and attractive frontages. Both entries are located to the front of the site and would be clearly visible from the street. Internally, the communal spaces would have sensible layouts, generous entrances, wide corridors, and spaces for internal letterboxes.
- 9.24 On upper levels, the layout is efficient and practical for future residents. With the exception of 4 units per floors 1 -3, all units are accessed from cores with no more than 7 units per floor. The 4 units per floor where this guidance is exceeded are in the north-west section of the building, where the units are accessed by deck-access. Whilst this is greater than the London Housing SPG recommends in guidance, the addition of a core just to serve these units is unfeasible and the detriment to the units due to their distance from the access is off-set by the opportunity for dual aspect and good daylight and ventilation by their being deck access. Officers are of the opinion that this layout does not give rise to an unsatisfactory living environment.
- 9.25 Some natural light will be provided to the corridors within the southern core, allowing an outlook to Brighton Road. There would be easy access for residents to cycle storage areas that are located directly off the ground floor entrances. The refuse area is to be located at ground level within the north-eastern wing. The refuse area is conveniently located for the north lift core and although somewhat further way from the southern lift core, the refuse area is still considered to be positioned in an appropriate location with safe and covered access.
- 9.26 All units would comply with the Nationally Described Space Standards, with sensible layouts, storage space and well-proportioned rooms. Most units (59%) would be dual aspect and no single aspect units are located on the northern elevation.



*Image 5 - Typical floor layout*

- 9.27 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 98% met with the recommendations for no sky line (NSL). The rooms that do not meet the recommended NSL guidelines of 80% just fall short at 74.5%. In terms of sunlight, 82% (41 rooms) of assessed rooms will receive levels of sunlight (APSH) that satisfy recommended targets (25%) throughout the year including during winter. Of the remaining nine rooms, five will achieve between 20 and 25% APSH. Only four rooms (8%) of the 50 rooms tested would have APSH less than 20%. Given the urban environment the level of compliance with APSH is considered acceptable.
- 9.28 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.
- 9.29 In terms of privacy between units, the scheme has been designed to ensure that windows to habitable rooms are appropriately located to ensure no overlooking occurs. Although some balconies, particularly within the rear corner 'elbow' of the development are located perpendicular to each other and within 10 metres of each other and windows to neighbouring units, any potential overlooking can be prevented by the inclusion of privacy screens. Potential privacy impacts could also arise from the external corridor of the north-western wing, however, planter boxes are proposed to provide some separation between the access way and windows to habitable rooms. The details of how suitable levels of privacy would be achieved would be conditioned if consent was granted. Subject to conditions, privacy within the scheme is considered acceptable for such a development.
- 9.30 In terms of noise, the site is located on Brighton Road, a busy and noisy highway. To demonstrate how the proposal addresses this issue a noise assessment was submitted. The assessment highlighted that noise levels would exceed acceptable levels as set out in guidance and included mitigation measures to overcome any potential impacts. The use of winter gardens to properties in line of sight to Brighton

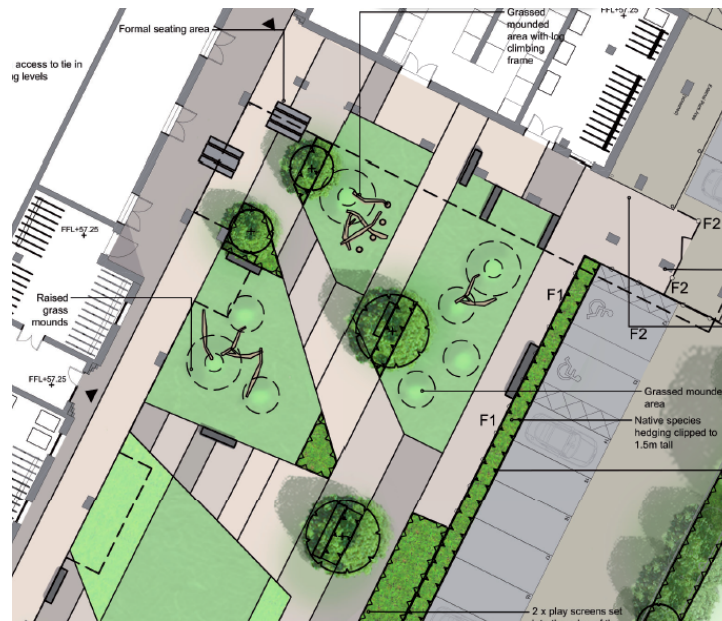
Road has been identified as the primary way to reduce noise to those most affected units. The winter gardens would achieve between 10dBA to 15dBA reduction to balconies. The noise assessment has been reviewed by Council's Environmental Health officer, who are satisfied that the proposed mitigation measures are sufficient to protect future residents from unacceptable noise levels arising from the sites position adjacent to a busy road.

#### Accessible Housing

- 9.31 Level access from Brighton Road is proposed, with both parts of the building containing a lift which allows step free access to all homes and the commercial units.
- 9.32 Each dwelling has been designated to meet the minimum space standards set out within Corydon Local Plan and the Mayor of London's Housing SPG, with 90% of the new build housing meeting Building Regulation requirement M4 (2) 'accessible and adaptable dwellings' with the remaining 10% meeting Building Regulation requirement M4 (3) 'wheelchair user dwellings' (designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users). 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 and trains), therefore wheelchair users would not be wholly car dependent. Four 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

- 9.33 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.
- 9.34 All units have direct access to private balconies (or winter gardens) ranging from 5 to 9sqm and the development also includes a large 727sqm communal area at ground level which has direct and level access from the two residential cores. This area allow opportunity for residents to access areas of open space that consist of grassed areas and formal seating as well as play space for children in an area with direct sunlight throughout a good part of the day. A condition is recommended to ensure that all units (regardless of tenure) have access to the amenity space.
- 9.35 In terms of play space, the child yield calculator expects 20 children to reside in the building. The proposal includes 280sqm 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 children's play space which in accordance within the London Plan is 200sqm. As outlined by image 6 below, the children's play space would be integrated into the communal space and would include raised grass mounds, log climbing frames and play screens located into the edge of the planting. It is expected that the play area would be of a high quality using natural materials that would be integrated into the communal area as a whole. By doing this, the communal area is a space that can be enjoyed by all residents of the building.



*Image 6 - Details of Child Play Space*

9.36 A sunlight test was carried out for the communal amenity space. The results of the analysis demonstrated that 93% of the area would receive at least two hours of direct sunlight on 21st March, which is considered acceptable.

### Housing Tenure, Types and Quality Summary

9.37 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, 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

9.38 The site is generally level allowing uninterrupted direct step and ramp free access to both lobbies and level public realm fronting Brighton Road. Given the relatively level nature of the site, the layout conforms to general practice for mixed used developments with an active commercial frontage facing the highway (Brighton Road) to the west with plant and service areas positioned within the building at ground level to the rear of the site.



- 9.39 The 'L' shape layout of the building adjacent to the western and northern boundary allows for a large communal amenity area to the rear of the site as shown by image 7 below. The building has also been stepped back 5 to 6 metres from the front site boundary thereby providing a generous area of new public realm. The topography means that all areas would be step and ramp free from the highway.
- 9.40 Vehicle access to the site would be from a new service road located on the northern side of the site and would provide access to on-site loading and service bays, parking spaces located in the north-east corner and along the eastern rear boundary of the site.

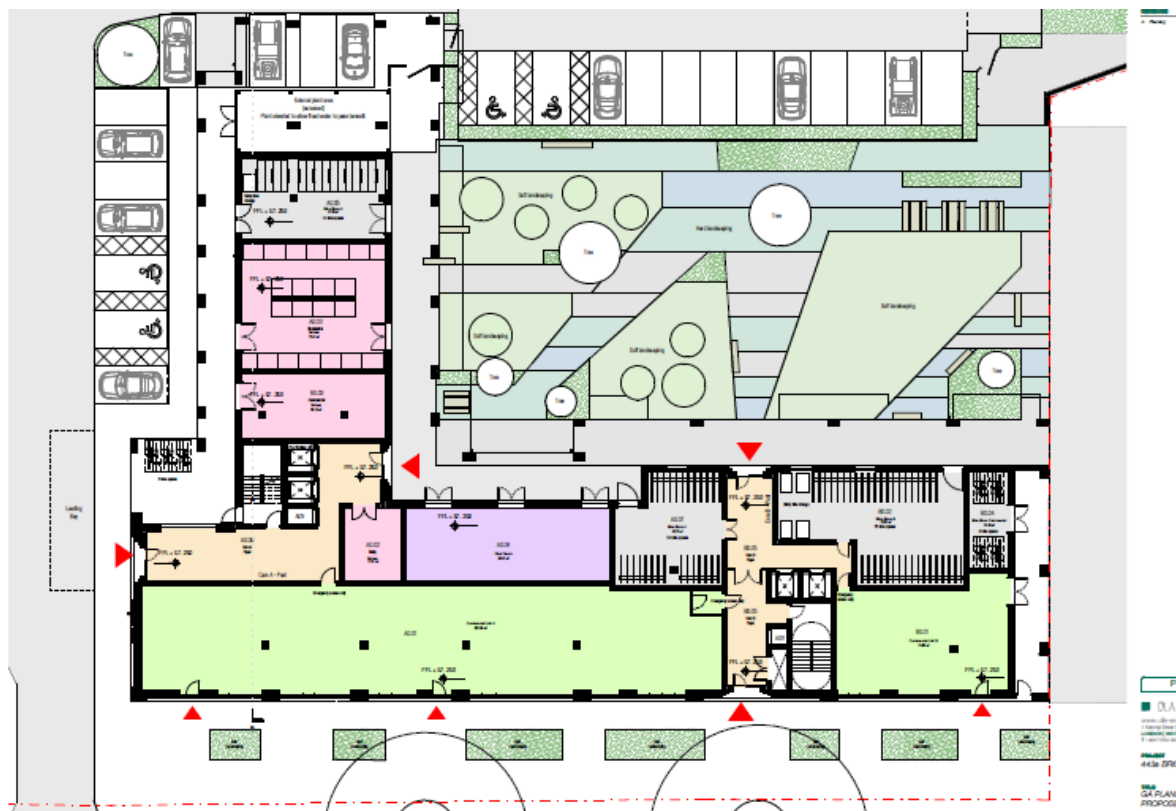


Image 7 – Proposed site layout

- 9.41 Residential access to the building would be via two entry lobbies, one located towards the southern end of the building fronting Brighton Road, the other located at the northern end of the main building immediately adjacent to the proposed new service road. Both lobbies provide direct access to lifts and stairwells serving the upper levels. The lobbies also provide access to the communal amenity space, cycle storage and refuse areas. The northern lobby contains three lifts to service 49 units and the southern lobby has two for serve 30 units. The two commercial units are separated by the southern residential lobby and both have single aspect frontage to Brighton Road.
- 9.42 A new pedestrian access point to the site would also be located at the south-eastern corner. This gated access would will provide a more direct, convenient and more pleasant route for residents to access Purley Oaks Station which is located

approximately 200 metres to the east of the site. Internal access to the building entry points is via level access through the communal amenity space. *Image 14* is an artist impression of the entry and also illustrates possible public art that could be installed in the vicinity of the entry point.



*Image 8: Details of the new residential entry points*

### Height, Scale and Massing

9.43 The site is located within an area defined by policy DM10.11 as an area of focussed intensification. The Suburban Design Guide states that new buildings in this area should be up to six storeys in height. The majority of the building accords with this, however it would rise to eight storeys in the north west corner fronting Brighton Road and the northern service way. The additional height was generally encouraged by some committee members and the Place Review Panel when the scheme was presented at pre-application stage. Although the height exceeds that suggested in the SDG, officers are of the view that the additional height helps improve both the visual appearance of the building by adding interest to the street scape in this part of Brighton Road and providing some variation to the building's height, which breaks down its massing. It is also noted that there are two four storey buildings immediately to the South of the site. In addition to the additional floor space improving the appearance of the building, it also allows greater opportunity for additional accommodation (including affordable units) without having unreasonable impacts on the amenity of nearby residential properties. Therefore whilst the tallest part of the building is taller than guidance suggests for the area, it is appropriate given the existing buildings to the South, follows good design practice and the policy approach set out in DM10.1 of securing high quality design.

9.44 As illustrated below, the height of the north-western wing of the building steps down from eight storeys to six then four floors as it approaches the eastern boundary and nearby residential properties. Despite the fact that the building is substantially larger in terms of height and mass to its neighbours, the buildings setback from the eastern and northern boundaries together with the stepped nature of the north-western wing results in a building mass that it expected to fit in well with its surroundings when viewed from both near and from a distance.



*Image 9: Massing of the proposed blocks*

#### Articulation, Materials and Detailing

- 9.45 The western elevation of the building would be the most prominent as it will be visible when travelling along Brighton Road between Croydon and Purley centres. This elevation presents an uncomplicated somewhat simple and uniform façade to the highway. The primary facing material is a rustic multi-toned red brick grid that is contrasted with areas of cream brick panels. The uniformity of the façade is further emphasised by position of windows and winter gardens/recessed terraces. Although simple in design, the recessed soldier courses to window surrounds and entrances together with the bronze finish to the balustrades and windows give the design more character and richness. Overall, the building is restrained, elegant and well-proportioned. To ensure that detailed design elements are well executed, specific details are required and would be conditions if consent is granted. As suggested at pre-application stage, the commercial ground floor windows have been modified to differentiate them from the residential elements of the building thereby clearly distinguishing the two uses on site.





*Image 10: Proposed Brighton Road Elevation*

- 9.46 The application form states that the balustrades, privacy screens, winter garden soffits, windows and doors will be fabricated from bronze anodised aluminium, however some drawing call outs mention PPC (polyester powder coated) aluminium. In this instance, a PPC finish would not be acceptable as it lacks colour variance and reflectance. The use of bronze anodised aluminium for these elements of the building would provide a subtle measure of visual interest in the street scene and would enhance the overall finish of the building. Notwithstanding this, to ensure that specific details of the finish are appropriate, specific details of the window reveals, soffits and privacy screens would be required by way of condition.



*Image 11: Details of balconies and winter gardens*

9.47 In terms of street scene, officers are of the view that the articulation, materials and detailing of the proposed building would successfully mediate between the low rise residential dwellings opposite and adjacent commercial buildings that currently make up the street scene and also the expected height, mass and layout of buildings which are likely to be built in this area of focused intensification.

## MATERIALS & BRICK DETAILS



Image 12: Details of external material pallet

### Designing Out Crime

- 9.48 With regards to safety and security, overall the scheme has been designed to minimise area where people can conceal themselves or access the building undetected. Often colonnade areas provide such opportunities, however in this instance, the colonnade located on the north side of the building and around the communal area are open in design with generous spacing between columns to ensure adequate levels of surveillance. 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. Further, to ensure that the communal and access areas of the scheme are adequately lit, details of external lighting and CCTV are also recommended to be secured by planning condition.

### Public Realm and Landscaping, Tree Removal and Ecology

- 9.49 Due to the relatively generous front setback, a substantial area of new public realm is proposed adjacent to Brighton Road. This area would extend the entire length of the site and consist of a new six metre wide paved foot path and large planter boxes. This is considered to be a significant benefit of the scheme and, whilst following the front elevation of the adjacent building, establishes a generous footway width for the development of schemes in this part of the intensification area which is beneficial given the busyness of Brighton Road. The overall design is simple, however would create a space that provides safe and convenient pedestrian access to both the ground floor commercial unit and residential entry points. In addition, the open nature of the space also allows for the continued growth of the street trees that are planted along this section of Brighton Road. In terms of safety the public realm has been designed to create layers of physical components that provide a safe yet welcoming



environment with good visual sightlines to and from the highway. As the site is located within a flood zone, the hard standing should be permeable and also be in line with the Public Realm Design Guide.

- 9.50 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, maintenance etc.) are high quality.
- 9.51 Three trees are proposed to be removed from the site along the eastern (rear) boundary, with a further seven required to be pruned in order to allow access to the site. No street trees are proposed to be removed to the front of the site. An arborist report was submitted as part of the application and stated that of the three trees to be removed, two (Hawthorn and Sycamore) are considered category C trees and one (Sycamore) a category B. The removal of the two Category C trees is necessary to make way for areas of hard stand and to facilitate the installation of the new substation. Both trees are considered low value and their removal can be mitigated by the planting of medium sized trees within the extensive new landscaped areas around the site. The removal of the category B tree is necessary as it is also located at the site of the new substation. To mitigate the loss of this tree it is suggested that a replacement tree be replanted within the vicinity of the substation, and further replacement trees within the landscaped area to the rear. With regards to the trees that would require pruning, these trees will need to be lightly pruned to the edge of the existing hard standing to enable the installation of tree protection fencing, with the exception of one tree (T8) which will be crown lifted to enable improved vehicular access beneath the crown. Overall, the arborist report concluded that the loss of these trees is not expected to have a significant detrimental impact on the surrounding landscape, particularly as the proposed layout includes a significant landscape area in the centre of the site. Council officers concur with the arborists conclusions and subject to appropriate tree replacement, are satisfied that the loss of these trees when weighed against the wider benefits of the scheme is acceptable. A landscape plan including details of proposed replacement trees would be required by way of condition if consent is granted.
- 9.52 In terms of impacts upon ecology, an ecological assessment was undertaken and concluded that habitats on site are of poor value and that buildings are unlikely to be suitable for bats. The proposed landscaping and tree planting on site is likely to enhance ecology on the site. Further, to ensure ecology on the site is improved, the proposal would also include such things as a biodiverse green roof, nest boxes for house sparrows and living walls and planters with nectar-rich climbers. The proposal was referred to Councils ecology officer which agreed with the findings of the ecology report and raised no objection subject to securing biodiversity mitigation and enhancement measures, which can be secured by condition.



Image 13: Landscaping Plan

## Public Art

- 9.53 Local Plan Policy DM14 requires the inclusion of public art, which is to be secured by a planning condition. The submission identifies that the applicant has committed to the provision of design elements within the scheme, specifically at the pedestrian entry located at the south-eastern corner of the site or alternatively, at the north-western corner of the building adjacent to the main vehicle entrance. Although no specific art work has been identified, the indicative images below illustrates how some sort of public art can be incorporated into the development. The condition will include review of the public art strategy, brief, working with local artists or groups and final designs and include physical samples and proofs of concept where appropriate.



*Image 14: Indicative Public Art located at the south-eastern corner entry to the site or on the north-western corner of the building.*

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

9.54 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. All neighbouring residential properties facing the site were tested for daylight impacts. Surrounding properties most likely to be affected are those residential units located on Brighton Road and also Grange road (to the rear). See Appendix 3 for BRE Guidance terms.





Image 15: Diagram showing locations of neighbouring properties

### Grange Road

Given the proposed position of the building on the site and separation distance to windows of almost 29 metres (as illustrated by Image 16), the proposal is not expected to have any unreasonable impacts upon properties facing Grange Road, as a line taken at 25% from typical ground floor window locations is not breached. As a result, the daylight/sunlight assessment has assessed impacts only on residential properties located along Brighton Road as shown in figure 16.

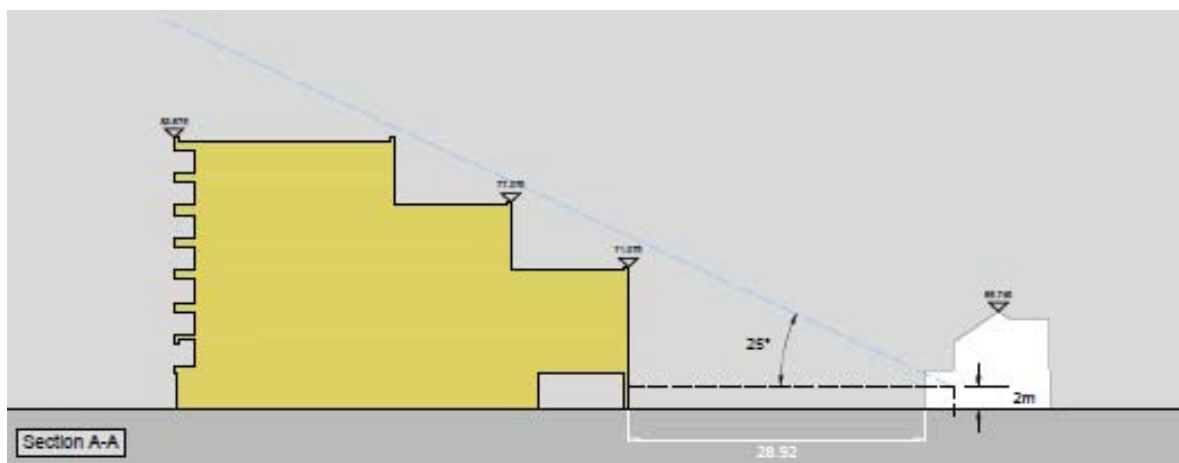


Image 16: Separation between site and properties facing Grange Road

### Brighton Road

- 9.55 22 neighbouring properties along Brighton Road were assessed for daylight/sunlight. A total of 35 rooms were tested against Vertical Sky Component (VSC), No Sky Line (NSL) and Average Daylight Factor (ADF) criteria. These properties are generally on the opposite side of Brighton Road, over 30m from the proposed building.

- 9.56 Overall, when assessed against the Vertical Sky Component (“VSC”) the proposal achieved a VSC compliance rate of 66% (23 rooms). When assessed against the No Sky Line (“NSL”), the scheme returns an NSL compliance rate of 66% (23 rooms) and in terms of daylight (ADF), the scheme returns a 94% (33 rooms) compliance rate. With respect to sunlight, a total of 68 windows were tested with a total of 93% (63 windows) expected to experience impacts beyond APSH guidelines.
- 9.57 23 windows met the VSC test with 12 windows in 6 properties failing it, showing that there is likely to be some impact on light and visibility of the sky. Of the 12, 10 would experience between a 20-29.9% minor reductions with the remaining two experiencing moderate effects of between 30-39.9% reductions. It is noted that the average reduction for the 6 properties is 25% which is not considered to be an unreasonable impact.
- 9.58 12 rooms fall below the NSL baseline criteria. Of these, six experience only a small reduction, which is generally considered to be minimal. The six remaining window’s all passed an ADF assessment, which demonstrates that whilst there would be reductions in light, sufficient light to these rooms is retained.
- 9.59 In terms of sunlight (APSH), the five windows with impacts are to side windows located in a 3-bay window serving a ground floor reception room. In each case, the other two windows of the bay achieving very good levels of APSH sunlight. As a result whilst there are some very isolated infringements to single windows, all neighbouring habitable rooms will comfortably achieve the BRE Guidelines in terms of APSH and will retain very good levels of sunlight.
- 9.60 In terms of sunlight to gardens, the assessment demonstrated that all neighbouring gardens and or amenity spaces would also satisfy the BRE guidelines for sun on ground criteria.

#### Daylight and sunlight conclusions

- 9.61 The proposal would not have a significant impact on properties to the rear and those to the side are in non-residential uses. There would be some impact on residential properties on Brighton Road, primarily those opposite. The BRE standards on daylight are not met for a small number of properties, with the reductions generally being minor. This impact needs to be taken in to consideration when assessing the scheme but needs to be considered in the context of the designation of the site as part of an area of focussed intensification where developments of this nature are encouraged and that it is not a policy requirement that BRE standards are met. Overall, these impacts are considered to be minor and more than outweighed by the above factors.

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

- 9.62 CLP Policy DM10.6 requires that the privacy of neighbouring properties must be preserved to reasonable levels. The proposed development would be located on the opposite side of Brighton Road from residential neighbours. These properties are in excess of 30 metres from the site and views towards those neighbouring properties are therefore available from public areas. It is acknowledged that given the height of the proposed development, the location of windows and balconies at the upper levels may give the perception of overlooking, however given the separation distance, together with the site’s location within an area of focused intensification, overlooking

is not expected to be unreasonable or detrimental to the amenity of adjacent properties fronting Brighton Road.

- 9.63 The closest neighbouring properties fronting Grange Road to the east are located approximately 29 metres away from windows and balconies positioned on the eastern elevation of the north-eastern wing of the proposed building. These windows and openings would face both the rear gardens and windows to habitable rooms of the neighbouring properties. The Suburban Design Guide suggests, in a suburban context, that separation distances of 18m are appropriate between new schemes and existing properties. The proposal, being larger, requires a greater separation distance and officers are of the opinion that the separation distance of 29m is more than adequate to prevent overlooking into neighbouring habitable rooms. The remaining windows and balconies located on the eastern side of the development are located up to 50 metres from the properties to the east. With respect to overlooking of the rear gardens, officers acknowledge that future residents of the development would have views towards the rear gardens of a number of these properties, however given the separation distance combined with the urban nature of the site, it is not expected that the proposal would prevent occupiers of these properties from enjoying their gardens in relative privacy.
- 9.64 As with privacy, in terms of outlook the distance between the proposed building and its nearest residential neighbours is considered good given its urban setting and being a site designated for higher residential densities.
- 9.65 The primary access points for residents would be directly from either the street frontage or north-west corner of the site. The position of the entry points would not introduce a noise source close to windows to habitable rooms on adjoining sites. Once constructed, the residential units are not expected to generate unreasonable levels of noise and general disturbance. Subject to conditioned hours of operation, the new commercial floor space fronting Brighton Road is not expected to result in any additional noise over and above that of the existing car showroom. In addition, the width and traffic volume along Brighton Road is also likely to negate any noise generated by the comings and goings of customers to the commercial units or any mechanical plant equipment. Notwithstanding this, details of any proposed mechanical plant equipment will be conditioned to ensure noise levels are no greater than background noise levels from the nearest residential property. With regards to servicing, all deliveries will occur via a loading bay located on the northern side of the site away from any nearby residential properties. The parking spaces to the rear are unlikely to result in a significant impact on properties on Grange Road given the nature of the existing use on the site. Overall, the scheme is not expected to result in any unreasonable impacts upon the amenity of nearby residential properties in terms of noise and disturbance.

## **Impact on the Surrounding Environment**

### Microclimate

- 9.66 A high level review of the wind conditions around the scheme was carried out to assess the potential effects of the proposed development on pedestrian level wind environment in and around the site. The review concluded that given the relatively minor scale of the scheme together with the building's orientation would result in a scheme that limits potential for downdraughts that would reach pedestrian level. The proposed development is not expected to have any significant impact upon on the



suitability of wind conditions for existing activities within the surrounding area, nor is it likely to result in unsuitable wind conditions for intended activities within the communal areas of the development itself.

### Contamination

- 9.67 A contaminated land report was submitted and included a Phase 1 Desk Study/ Preliminary Risk Assessment Report. The report was reviewed by Councils contamination consultant who considered the report to be satisfactory and accepted the findings of the Phase 1 assessment. However, with regards to future phases of contamination management, a condition is recommended to ensure appropriate investigation, management and remediation.

### Air Quality

- 9.68 The site is in an Air Quality Management Area (AQMA). The submitted air quality assessment demonstrates that the proposal would have a negligible impact upon air quality. With regards to transport emissions it is noted that the scheme would also result in negligible impacts upon existing baseline conditions. In terms of predicted concentrations of NO<sub>2</sub> and PM<sub>10</sub>, the assessment predicts that all concentrations would fall within recommended guidelines and no specific mitigation is required. The air quality assessment found that subject to the implementation of suggested mitigation measures, the effects of construction dust and emissions from the demolition and construction activities will be temporary and not significant. A contribution of £8,000 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

- 9.69 The site is located in Flood Zone 3 and is vulnerable to flooding as such a sequential and exception tests were required and subsequently undertaken. A Flood Risk Statement accompanied the application. With regards to surface water flood risk the site is shown to be at a predominantly 'low' surface water flood risk with Brighton Road associated with a 'high' risk. There is a small area of the site noted as being within a 'medium' risk of surface water flooding. As the site is located within Flood Zone 3, no residential floor space is proposed at ground level and at 61.3mAOD the finished floor level of the commercial units would be above the residual flood level. In terms of drainage, due to the strict requirements set out by the Environment Agency, and considering the site constraints, infiltration is deemed unfeasible for the site. SuDS would be in the form of living roofs, permeable paving, a geocellular attenuation tank and a proprietary SuDS feature in the form of a flow control device, prior to discharge into the Thames Water sewer. The LLFA has reviewed the findings of the Flood Risk Assessment and support their findings and raised no objection to the proposed SuDS approach. Subject to the recommended condition, the proposal would be acceptable in terms of drainage and flood risk.

### Construction Impacts

- 9.70 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

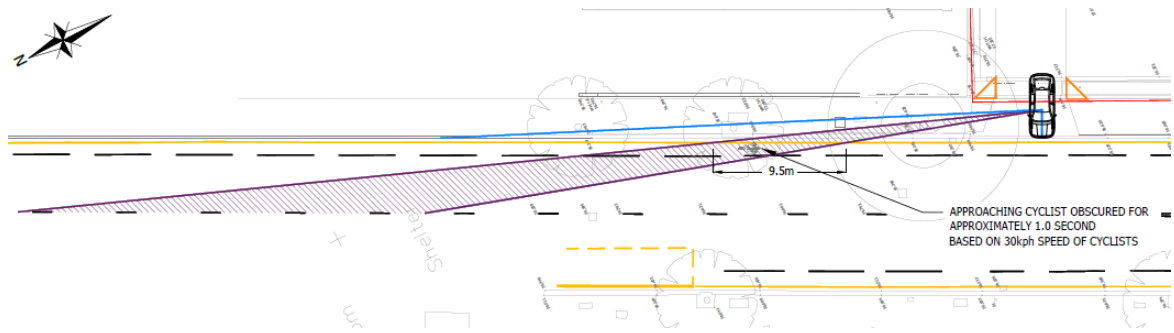
- 9.71 To avoid excessive light pollution, a condition is recommended requiring details of external lighting, including details of how it would minimise light pollution.

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

- 9.72 The site has a Public Transport Accessibility Level (PTAL) of 3 (moderate) (on a scale of 0-6b, where 6b is the most accessible). Although the PTAL rating is moderate, the site is located within 100 metres of PTAL 4 and is generally well served by public transport with many bus routes along Brighton Road and Purley Oaks Station located within 200 metres of the site.
- 9.73 Vehicle access to the site would be off Brighton Road using an existing but not used crossover. A new access road located along the northern boundary will provide access to the parking area located to the eastern side of the site and also a loading bay and service bays as illustrated by image 17 below.

### Access

- 9.74 The access is located towards the northern boundary of the site, making use of an altered and enlarged access location. Brighton Road at this point is a designated A-road and forms part of the strategic road network. A cycle route is also present on this part of Brighton Road. Accesses need to be carefully considered to ensure that there is no detrimental impact in terms of highway safety or traffic flows.
- 9.75 The use of an existing access is beneficial but it would serve a different use, generating different levels of vehicle movement and would also be enlarged. Transport for London (TfL) are a consultee on the strategic road network and they raised no objection to the access. The amount of trips considered likely to be generated are not so significant as to have an impact on the operation of the highway.
- 9.76 Amended drawings have been received to provide an enlarged access to the highway with easier manoeuvring and a wider access route so that vehicles can more easily pass a service vehicle and so prevent the likelihood of queuing on the highway.
- 9.77 A street tree is located to the north of the access point which would have an impact on a driver's visibility of the highway leaving the site. The likelihood of a motor vehicle being entirely hidden behind the tree is minimal but it would be possible for a cyclist to be momentarily hidden (for about a second) behind the tree due to the length of a bike and its speed. The point at which a bicycle is not visible is at some distance from where a vehicle would be entering the highway and as a vehicle approaches the highway this area would move. Vehicles entering the highway are also likely to be moving slowly or cautiously and so officers are satisfied that the impact of the access on the safety of the highway is satisfactory.



*Image 17 – Cyclist visibility splay*

## Parking

- 9.78 In terms of parking requirements, the Croydon Local plan adopts the London Plan's parking requirements (Table 6.2) which set a maxima and. In accordance with Table 6.2 of the London Plan, a maximum of 1 space per unit is suggested.
- 9.79 Both the Croydon Local Plans and London Plan encourage the use of more sustainable transport methods such as park clubs, public transport, cycling and walking in order to encourage sustainable travel in general. Availability of parking should therefore be below maximum levels apart from in areas where the impact of overflow parking on street would be unacceptable.
- 9.80 Although somewhat dated, the 2011 census data for car ownership in the Purley ward indicted that 50.5% of households had a vehicle. Based on this information, the submitted Transport Statement (TS) estimates that car ownership in the scheme would generate 48 vehicles.
- 9.81 The proposal includes 25 on-site parking spaces, 4 would be blue badge spaces and a further two would be allocated to a car club. A total of 21 spaces would be made available to the remainder of the 79 units. Based on this information, there is potential for up to 25 additional vehicles parking within the surrounding streets.
- 9.82 To establish if this would create an unacceptable impact upon parking and therefore traffic conflicts within the surrounding streets, a parking stress survey was undertaken. The survey results indicated that on average, around 67 spaces were available within 400 metres of the site, and therefore the expected overflow of 25 vehicles can be accommodated on street leaving 42 spaces.
- 9.83 To mitigate any likely impact of the development on parking stress within the surrounding network and to encourage more sustainable transport methods, the applicant has proposed a number of strategies.
- 9.84 In accordance within Table 10.1 of the CLP, two car club spaces are proposed to be located on site, each of which generally provide the equivalent of up to 8 parking spaces. Membership to the car clubs would be made available to residents of the development thereby providing safe and convenient access to a vehicle. The proposal also includes a loading bay and two service bays that can be used for deliveries of food and other domestic services. These bays would therefore provide excellent service facilities that would encourage residents to get items delivered rather than collecting items themselves.

- 9.85 Furthermore, it is proposed that a study of the potential to enlarge or introduce car parking restrictions is carried out, with future residents being prevented from applying for parking permits. The applicant has agreed to these requirements including funding of a CPZ study scheme.
- 9.86 Overall, in this location, in an area designated for growth and with the mitigation measures proposed, it is considered appropriate for significantly less than 1:1 parking to be provided on site. With the above measures to encourage sustainable modes of transport, discourage on street parking and with residents being restricted from applying for future permits, the proposed number of parking spaces and impact on on-street parking is considered to be acceptable.
- 9.87 20% of all vehicle spaces (including car club and blue badge spaces would be required to have active electric vehicle charging points with all other spaces requiring opportunity for future connection. This will be secured through the s.106 agreement.

#### Cycle Parking

- 9.88 144 long stay cycle parking spaces and 6 short stay cycle parking spaces are proposed for the residential development. Each residential block would have its own cycle storage located at ground level with easy access to entrance lobbies. Access to/from the street can be from a number of points around the site. However, the primary way would likely be via the service way located to the northern side of the building or via a pedestrian/cycle access way located at the southern end of the building fronting Brighton Road. Alternative ways are via the access way located in the south-eastern corner of the site and through the southern entrance lobby. The proposed cycle parking provides 1.82 spaces per unit and accords with the draft New London Plan requirement. Further, 9.7% of the overall cycle spaces are wider spaced Sheffield stands and 8 spaces have also been provided for the commercial units. Council staff are satisfied that on balance, the number and location of cycle spaces proposed are reasonable.

#### Deliveries and Servicing

- 9.89 Delivery and Servicing of the commercial units and refuse facilities are proposed to take place from a loading bay located along the northern side of the building within the vehicle access. The loading bay is located on-site in a convenient location and would ensure that no vehicles servicing the site have reason to stop on Brighton Road and interfere with traffic movements along this busy road. In addition to the loading bay, specific bays have also been provided for delivery vehicles servicing the residential units. These areas are located on the northern side of the service road and adjacent to the substation in the north-east corner of the site. Officers are of the opinion that these additional service bays would further enhance the safe and efficient servicing of the site and are located in positions that are both convenient for their intended purpose and would not obstruct on-site parking spaces or vehicle movements throughout the site. Notwithstanding this, a Delivery and Servicing Plan and Car Parking Management Plan should be provided to ensure that these facilities are appropriately managed which are recommended by condition.

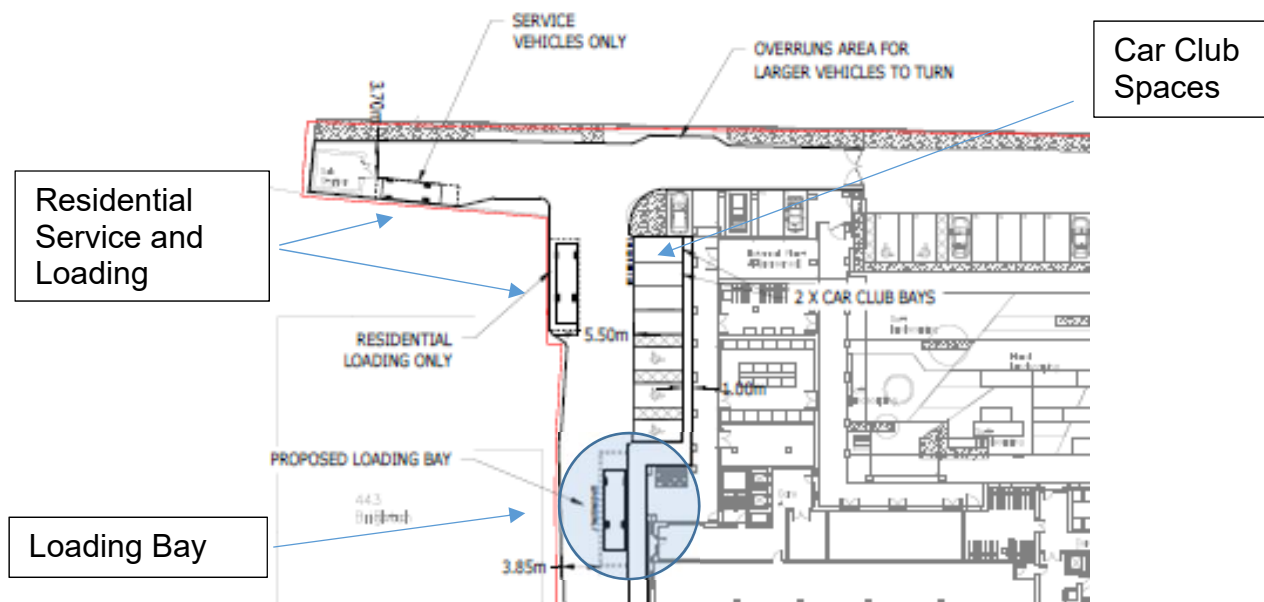


Image 17: Location of primary loading, service areas and car club spaces

### Bin Storage

9.90 The proposal includes two specific bin storage areas located at ground level under the north-east wing of the building and within 30 metres of each residential core. A separate refuse area is provided for both the residential units and commercial component. Collection of refuse would be from the vehicle access way located along the northern boundary of the site and accessed from Brighton Road. The proposed arrangements would provide sufficient capacity for food, mixed dry recycling and landfill waste. Each of the two refuse areas are within 11 metres of the kerb and would be accessible for easy collection from refuse vehicles from the designated loading bay. The space in the collection area has been designed in accordance with the Waste and Recycling Planning Policy Document 2018 produced by the LBC Waste Management Team. Notwithstanding this, a waste management plan is to be conditioned.

### Sustainable Travel

9.91 Given the nature of the development, increased walking, cycling and public transport use is expected. The impact of additional development within this area of intensification, including the proposed development, is expected to require upgrades to existing services. Further, given the site's moderate PTAL rating and number of on-site parking spaces, two on-site car club spaces and associated membership for future residents have been provided to further help the scheme be more sustainable with respect to transport. Notwithstanding this, to further offset the impacts of the development and secure improvements to transport infrastructure, a sustainable transport contribution is to be secured in the s.106 agreement.

9.92 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

- 9.93 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.
- 9.94 The scheme is expected to achieve at least a 35.18% reduction in Part L for the residential areas and 20% for the commercial for on-site regulated emissions. The use of PV on the roof will service the residential units contributing to the reduction levels. Although the commercial units fall short of the 35% target, the energy report states that all attempts have been made to improve their energy efficiency. Notwithstanding this, given the small floor area of units, their contribution towards CO<sub>2</sub> emissions is minimal over the whole scheme. An offset payment for this shortfall and 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.
- 9.95 Policy SP6.3 requires a high standard of sustainable design and construction. The submission outlines a range of measures, such as energy efficient building fabric (wall insulation and efficient glazing) and PV panels, fitting water efficient fittings, choosing materials with lower environmental impacts (steel with 95% recycled content, FSC or equivalent timber, non-toxic materials), the implantation of a waste minimisation strategy (including reuse of waste on site where possible) and additional planting to enhance ecology on the site.
- 9.96 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 shall also be secured.

### Water Use

- 9.97 A planning condition is recommended to secure compliance with the domestic water consumption target of 110 litre/person/day, to ensure sustainable use of resources.

### **Other Planning Issues**

- 9.98 A Healthy street indicator overview has been submitted as part of the application. The review outlines how the scheme would promote and provide increased opportunity for a healthier life style for both future residents and the wider community. The provision of substantial cycle facilities, the sites proximity to rail and bus services, proposed improvements to footpaths, the use of environmentally friendly techniques, together with high quality areas of public realm and communal open space within its urban context results in a development that promotes and contributes to a more healthy lifestyle.
- 9.99 The site is located within an Archaeological Priority Area. The submitted archaeology report determined that the site has a low to moderate archaeological potential for the roman period and a low archaeological potential for all other periods of human occupation. The report concluded that based on this, no further archaeological



mitigation is considered necessary. The application was referred to Historic England (archaeology) who raised no objection to the findings of the assessment.

- 9.100 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. Comments received from the London Fire Brigade raised no objection to the proposal, however stated that the access for fire appliances should be in accordance with the relevant building regulations and also that adequate water supplies for firefighting be provided.
- 9.101 An initial TV and Radio signal impact (desk top) 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 report recommended mitigation options to overcome any reported television or radio interference that is identified at post-construction stage. To appropriately identify any impacts then a baseline reception survey should be undertaken. Given the height, mass and location of the proposed building, it is important to mitigate any impacts once the building is constructed. This will be secured via condition on any consent granted.
- 9.102 In order to ensure that the benefits of the proposed development 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.
- 9.103 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 quantum of new residential accommodation that would enhance the type of accommodation available for the people of the area. The proposal would provide genuinely affordable housing in the form of London Affordable Rent units, as well as a good number of 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. The loss of the existing Sui Generis use on the site would be suitably compensated by the introduction of new commercial floor space that has the opportunity for employment generation. The development minimises on-site parking spaces that would encourage residents to use more sustainably transport methods resulting in a more environmentally sustainable development thereby complying 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:**

<b>Existing Drawings</b>	<b>Drawing Reference</b>	<b>Scale</b>
Site Location Plan	2018-045_0050	1:1250 @ A1
Existing Site Plan	2018-045_0100	1: 200 @ A1
Existing West Elevation	2018-045_0130	1:100 @ A1 / 1:200 @ A1
Existing North Elevation	2018-045_0131	1:100 @ A1 / 1:200 @ A1
Existing East Elevation	2018-045_0132	1:100 @ A1 / 1:200 @ A1
Existing South Elevation	2018-045_0133	1:100 @ A1 / 1:200 @ A1
<b>Proposed Floor Plans</b>	<b>Drawing Reference</b>	<b>Scale</b>
Proposed Site Plan	2018-045_0200	1:200 @ A1
Proposed Ground Floor Plan	2018-045_0210	1:100 @ A1
Proposed First Floor Plan	2018-045_0211	1:100 @ A1
Proposed Second Floor Plan	2018-045_0212	1:100 @ A1
Proposed Third Floor Plan	2018-045_0213	1:100 @ A1
Proposed Fourth Floor Plan	2018-045_0214	1:100 @ A1
Proposed Fifth Floor Plan	2018-045_0215	1:100 @ A1
Proposed Sixth Floor Plan	2018-045_0216	1:100 @ A1
Proposed Seventh Floor Plan	2018-045_0217	1:100 @ A1
Proposed Roof Plan	2018-045_0217	1:100 @ A1
<b>Proposed Elevation Plans</b>	<b>Drawing Reference</b>	<b>Scale</b>
Proposed West Elevation	2018-045_0230	1:100 @ A1 / 1:200 @ A1
Proposed North Elevation	2018-045_0231	1:100 @ A1 / 1:200 @ A1
Proposed East Elevation	2018-045_0232	1:100 @ A1 / 1:200 @ A1
Proposed South Elevation	2018-045_0233	1:100 @ A1 / 1:200 @ A1
<b>Proposed Section Plans</b>	<b>Drawing Reference</b>	<b>Scale</b>
Section 01	2018-045_0220	1:100 @ A1 / 1:200 @ A1
Section 02	2018-045_0221	1:100 @ A1 / 1:200 @ A1

**Documents:**

<b>Technical Documents</b>	<b>Consultant</b>
<b>Air Quality Impact Assessment</b>	Ardent

<b>Technical Documents</b>	<b>Consultant</b>
<b>Arboriculture Survey, Arboriculture Impact Assessment &amp; Arboriculture Method Statement</b>	PJC Consultancy
<b>Archaeological Desk Based Assessment</b>	CgMS
<b>Daylight/Sunlight Assessment</b>	Delva Patman Redler
<b>Energy &amp; Sustainability Assessment</b>	JAW
<b>Employment and Marketing Strategy</b>	Aitch Group
<b>Flood Risk Assessment &amp; Critical Drainage Strategy (incl. Appendices A - K) (including SUDs strategy)</b>	Ardent
<b>Foul Sewage &amp; Utilities Assessment</b>	Ardent
<b>Land Contamination – Desk Study / Preliminary Risk Assessment Report (incl. Appendices)</b>	Jomas
<b>Landscape Plan &amp; Strategy</b>	Nigel Cowlin Limited
<b>Preliminary Ecological Appraisal (including Phase 1 Habitat Survey)</b>	Ecology Partnership
<b>Noise &amp; Vibration Assessment</b>	Ardent
<b>Transport Statement (incl. Draft Servicing Strategy, Framework Travel Plan, Draft Construction Traffic and Waste Management Plans)</b>	Ardent
<b>TV/Radio Reception Impact Assessment</b>	Pager Power
<b>Viability Statement</b>	Turner Moram
<b>Wind Microclimate Assessment</b>	Urban Microclimate

<b>Revised Documents Post Submission</b>	<b>Reference</b>
Designer's Response- Stage 1 Road Safety Audit	Report Ref. 186590-06
Delivery and Servicing Vehicle Routing Strategy	Drawing No. 186590-SK01
Highways Comments Response	Iceni Projects issued 15 <sup>th</sup> July 2020
Amended Proposed Ground Floor Plan	2018-045_0210
Amended Proposed Site Plan	2018-045_0200
Public Art Proposal	Drawing No. 0240
Sustainability Statement (July 2020)	
Healthy Streets Statement (July 2020)	

## **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
- S11 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.