

**PART 6: Planning Applications for Decision**

**Item 6.3**

**1 SUMMARY OF APPLICATION DETAILS**

Ref: 20/01524/FUL  
 Location: Atlanta Court, 65 Parchmore Road, Thornton Heath, CR7 8SH  
 Ward: Thornton Heath  
 Description: Demolition of existing garages and structures. Erection of four storey building providing 20 residential units with associated parking, amenity space, refuse and cycle storage.  
 Drawing Nos: 256-A-P-XX-001 Existing Location Plan, 256-A-P-XX-002 Existing Site Plan, 256-A-P-00-003 Existing Site Plan, 256-A-E-XX-015 Existing West Elevation, 256-A-E-XX-011 Existing West Elevational Section, 256-A-E-XX-013 Existing South Elevation, 256-A-E-XX-012 Existing North Elevation, 256-A-E-XX-014 Existing East Elevation, 256-A-E-XX-010 Existing East Elevation (Street), 256-A-E-XX-300 Proposed Street Elevation, 256-A-E-XX-301 R2 Proposed East Elevation, 256-A-E-XX-302 R2 Proposed North Elevation, 256-A-E-XX-303 R2 Proposed West Elevation, 256-A-E-XX-304 R2 Proposed South Elevation, 256-A-P-00-100 R7 Proposed Site Plan, 256-A-P-00-110 R7 Proposed Ground floor Plan, 256-A-P-00-115 R5 Proposed Ground floor Plan part 2, 256-A-P-01-111 R6 Proposed First floor Plan, 256-A-P-02-112 R6 Proposed Second Floor Plan, 256-A-P-03-113 R6 Proposed Third Floor Plan, 256-A-P-04-114 R6 Proposed Roof Plan  
 Applicant: Brick By Brick Croydon Limited  
 Agent: Mr Goode, Carter Jonas  
 Case Officer: Mr White

	<b>1 bed 2 person</b>	<b>2 bed 4 person</b>
<b>Existing</b>	0	0
<b>Flats</b>	14 (all Affordable rent)	6 (all Affordable rent)

<b>Number of car parking spaces</b>		<b>Number of cycle parking spaces</b>
Existing	Proposed	33 long stay 2 short stay
22 hard standing 16 garages	21 hardstanding	

1.1 This application is being reported to Planning Committee because objections above the threshold in the Committee Consideration Criteria have been received and the Vice-Chair of Planning Committee at the time of referral (Councillor Paul Scott) made representations in accordance with the Committee Consideration Criteria and requested committee consideration.

**2 RECOMMENDATION**

2.1 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:

- a) Delivery of all units as affordable housing (affordable rent)
- b) Restriction of parking permits for future occupiers if CPZ extended to cover area.
- c) Zero carbon off set payment of £9,660 (subject to review if the energy performance improves during the detailed design stages)
- d) Air Quality payment of £2,000
- e) Local Employment and Training Strategy
- f) Local Employment and Training Contributions – Construction £10,722
- g) Provision of off-site car club bay with an EVCP (prior to occupation) and 3 years membership for future occupants.
- h) Relevant monitoring fees
- i) Any other planning obligation(s) considered necessary by the Director of Planning and Strategic Transport

2.2 That the Director of Planning and Strategic Transport has delegated authority to negotiate the legal agreement indicated above.

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

### **Conditions**

#### Standard conditions

- 1) Commencement time limit
- 2) In accordance with drawings

#### Pre-commencement conditions

- 3) Demolition and Construction Logistics Plan
- 4) Details of access road and enter in Road Making Agreement
- 5) Piling method statement
- 6) SUDS

#### Pre-ground floor slab conditions

- 7) Submission of details of external facing materials, sections of windows and doors, junctions between external materials, balconies, roof structures, ventilation system and rainwater goods. Built in accordance with approved details (Condition informative - should afford a level of privacy to occupiers).
- 8) Noise assessment to ensure adequate sound mitigation
- 9) Cycle, refuse, gate and pedestrian access details to be submitted, approved and provided
- 10) Contamination - intrusive site investigation (post demolition)
- 11) No construction within 5m / diversion of water main

#### Prior to occupation conditions

- 12) Landscaping (planting, biodiversity enhancements, hard landscaping materials, boundary treatment, lighting and replacement drying line)
- 13) Play space details
- 14) Vehicle access, gate location, vehicle turning area and car parking spaces to be provided as indicated
- 15) Car park management plan
- 16) Electric Vehicle Charging points

#### Compliance conditions

- 17) Tree protection
- 18) Accessible/adaptable and wheelchair user dwellings
- 19) Carbon emission
- 20) Machinery noise restricted
- 21) Water consumption limit
- 22) Access for existing residents to communal amenity and play space in perpetuity
- 23) Any other planning condition(s) considered necessary by the Director of Planning and Strategic Transport, and

### **Informatives**

- 1) Community Infrastructure Levy
- 2) Site notice removal
- 3) Subject to Section 106 agreement
- 4) Croydon code of Construction
- 5) Information from Thames Water
- 6) Any other informative(s) considered necessary by the Director of Planning and Strategic Transport

2.4 That, if by 3 March 2021 the legal agreement has not been completed, the Director of Planning and Strategic Transport has delegated authority to refuse planning permission.

## **3 PROPOSAL AND LOCATION DETAILS**

### **Proposal**

3.1 The proposal includes the following:

- Demolition and clearance of existing structures;
- Clearance of all existing landscaping and hardstanding on the site;
- Construction of a four storey residential development, providing 20 new affordable homes (14 x 1b2p and 6 x 2b4p), with associated refuse storage;
- Proposed materials are red brickwork, gold coloured metal framed windows and doors and gold coloured metal balustrades
- Provision of 21 car parking spaces and 33 cycle parking spaces;
- Amenity and play space for the proposed development, which will open onto the existing amenity space, and be available for residents of both the proposed and existing blocks.

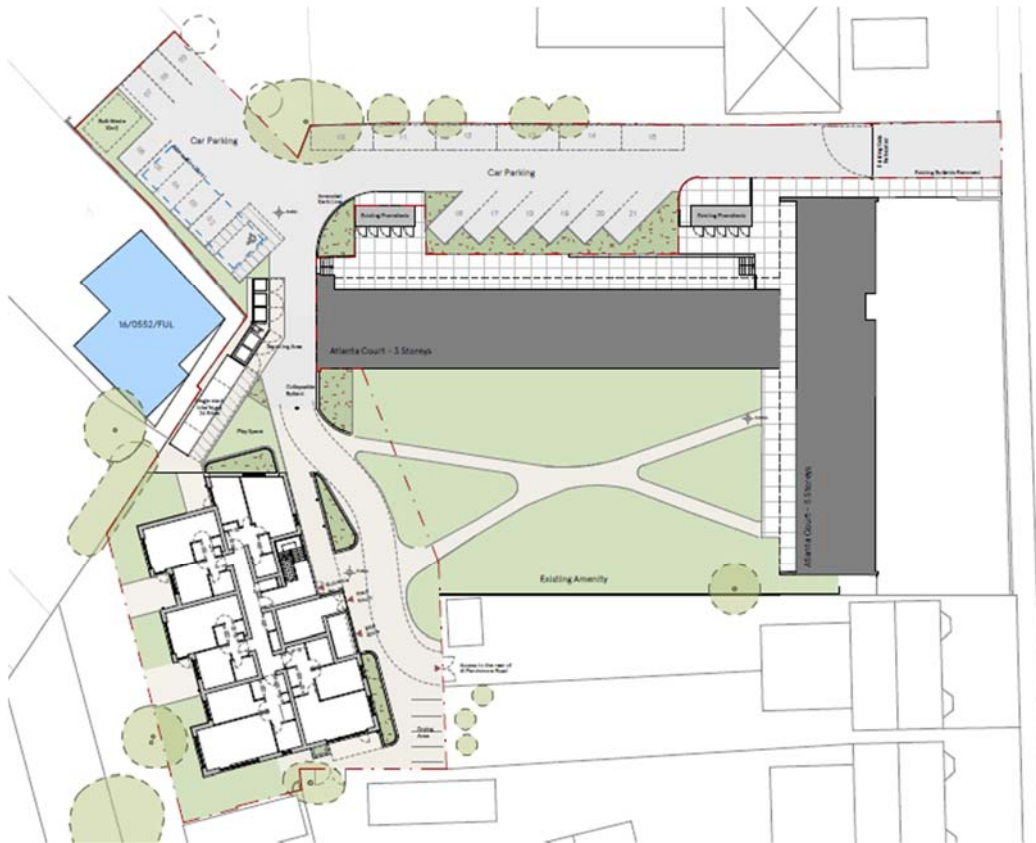


Fig 1: proposed site layout

3.2 The Council received amended drawings for the following (which did not necessitate re-consultation given their relatively minor nature):

- Landscaping revised to allow for a small turning area opposite entrance to new block
- Adjustment to balconies on the south elevation to a rectangular shape from semi circular.
- The finish to the recesses on the western (rear) elevation is shown as render.

### Site and Surroundings

3.3 The application site for the development (red outline in the drawing below) wraps around the north, west and south areas of Atlanta Court (a block of 32-flats block) and currently consists of an access way, drying area, parking area, garages and a portion of the outdoor green space currently serving Atlanta Court. It is accessed via the western side of Parchmore Road and is located approximately 80 metres to the north of Fernham Road. There are currently 16 garages on site. In addition, there are 23 marked car parking spaces.

3.4 The current building, Atlanta Court, is a part 3-storey, part 5-storey block comprising 5 x 2-bed and 18 x 1-bed (32 in total) flats (blue outline). This lies outside of the application site (red outline), but within the same ownership. The site is adjoined by residential properties.

3.5 The site is within a PTAL area of 4 (good) at the front, 3 (moderate) at the rear, but also close to 5, with good access to public transport options and wider facilities. The site is not in a CPZ but is adjacent to one. The site is within Flood Zone 1 and is considered to be at 'very low' risk of surface water flooding.



Fig 2: Existing site layout



Fig 3: Aerial photograph of surrounding context

## Planning History

- 3.6 Between October and December 2019 officers engaged in pre-application discussions with the current applicant, initially proposing a scheme of 32 flats over five storeys that encroached the amenity area (LBC Ref 19/04909/PRE).
- 3.7 There is no relevant planning history for the subject site, but the following planning decisions / history are relevant to the application:

### Neighbouring site - Rear of 36 Beulah Road

16/05522/FUL – Demolition of existing buildings; Erection of a three storey building comprising 6 one bedroom, and 3 two bedroom flats; provision of associated parking, provision of refuse and cycle storage.  
Permission granted. 26.01.2017.

17/05399/FUL– Demolition of existing buildings; Erection of a three storey building comprising 6 one bedroom, and 3 two bedroom flats and a two bedroom detached house; provision of associated parking, provision of refuse and cycle storage.  
Permission granted. 24.07.2020.

The rear of 36 Beulah Road is currently a clear site with a number of trenches dug.

## 4 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The principle of intensified residential development is acceptable given the national and local need for housing.
- There is no objection to the loss of garaging particularly subject to an appropriate re-provision.
- The proposed housing density would be within that outlined as normally acceptable in the London Plan.
- The proposed unit mix includes 30% 2b4p units (justified in the viability statement) and therefore meets the strategic target of family housing. An individual site target of 40% is not achieved, but the scheme does provide the greatest housing mix need for affordable rent accommodation and is therefore accepted.
- The proposal would contribute positively to the supply of family housing and affordable housing.
- The scheme would provide high quality architecture and would appropriately respond to site context with suitable relationships to the form, mass and appearance of surrounding buildings.
- The living conditions enjoyed by neighbouring residential occupiers would not be overly harmed by the proposed development (in terms of daylight, sunlight, enclosure and privacy effects).
- The living standards of future occupiers would be satisfactory (in terms of overall residential quality) and would comply with the Nationally Described Space Standard (NDSS). Each family unit would enjoy private amenity spaces in accordance with adopted standards and the land to the front and side could be made available for play space.
- The level of parking and impact upon highway safety and efficiency would be acceptable. Officers are satisfied that the replacement parking provision is sufficient to cover the needs of the development and Atlanta Court alongside a commitment to provide an off-site car club space (with EVCP), future occupiers with a car club

membership (for 3 years) and a travel plan. A restriction on parking permits should the CPZ be extended would further protect the on-street capacity.

- There are no trees on site, so a landscaping scheme will improve biodiversity. Measures to protect trees on neighbouring land, beyond pruning, would be secured by condition.
- Sustainability aspects have been properly assessed and their delivery can be controlled through the use of planning conditions. On site sustainable drainage would be secured through the use of planning conditions.
- With suitable conditions and obligations (which are recommended) to secure mitigation, the development is considered acceptable with regards to its environmental impacts.

## **5 CONSULTATION RESPONSE**

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

5.2 The following were consulted regarding the application:

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

5.3 No objection, subject to condition [OFFICER COMMENT: a condition is recommended accordingly].

### **Thames Water (Consultee)**

5.4 Thames Water have not raised any objection to the proposal and requested that should planning permission be granted conditions and informatives are added covering the following;

- Piling method statement (condition)
- No construction within 5m / diversion of water main (condition)
- Groundwater Risk Management Permits (informative).
- Nearby asset guidance (informative).
- Advice on minimum water pressure provided (informative).

[OFFICER COMMENT: conditions/informatives are recommended accordingly].

### **London Fire Commission (Consultee)**

5.5 Access for fire appliances and adequate water supplied for firefighting purposes should be provided. [ OFFICER COMMENT: this is a matter for Building regulations ].

## **6 LOCAL REPRESENTATION**


6.1 The application has been publicised by way of 98 letters of notification to neighbouring properties in the vicinity of the application site. The application has also been publicised in the local press and through 2 site notices. The number of representations received from neighbours, local groups etc in response to notification and publicity of the application are as follows:

No of individual responses: 17      Objecting: 16      Supporting: 0      Comment: 1

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

<b>Summary of objections</b>	<b>Response</b>
<i>Townscape</i>	
<ul style="list-style-type: none"> <li>• Overdevelopment</li> <li>• Density concern</li> <li>• Obtrusive by design / Not in keeping / Too tall / Massing out of character / Materials out of keeping / Intrusive and incongruous</li> </ul>	<ul style="list-style-type: none"> <li>• Planning policy seeks to optimise the use of sites.</li> <li>• The scheme falls within the lower end of the appropriate density range.</li> <li>• The layout, massing and external appearance of the proposed development is addressed in paragraphs 8.14- 8.18</li> </ul>
<i>Amenity</i>	
<ul style="list-style-type: none"> <li>• Loss of light / over shadowing Loss of privacy / overlooking / Increased noise / Blight gardens and houses / Increased disturbance from people passing through to site. / Influx of people harmful to mental health</li> <li>• Disturbance from construction</li> <li>• Communal green space reduced</li> </ul>	<ul style="list-style-type: none"> <li>• Neighbour impacts are covered in paragraphs 8.20 – 8.34</li> <li>• Any disturbance from construction would be temporary and not sufficient to warrant a refusal reason.</li> <li>• Addressed in paragraph 8.47.</li> </ul>
<i>Transport</i>	
<ul style="list-style-type: none"> <li>• Move gate further back to prevent vehicles blocking road</li> <li>• Increased traffic</li> <li>• More street parking / Insufficient parking spaces (over provision for proposed development and under provision for existing) / Some parking not practical</li> <li>• Bollards need to restrict unauthorised parking</li> </ul>	<ul style="list-style-type: none"> <li>• This has been incorporated into the design.</li> <li>• Highway, parking and wider transportation issues are covered in paragraphs 8.49 - 8.58</li> <li>• This would be a matter for the management of the site, however, the entrance gate restricts the movement of cars into and out of the site and can be secured by condition. Nonetheless, it should be noted that the (white) bollards within the hatched area on the access road would be removed, but those on the footpath would remain.</li> </ul>



<ul style="list-style-type: none"> <li>Automated gate system should be included</li> <li>How will temporary parking for on-site residents be managed during construction</li> <li>How will the parking be managed / allocated</li> <li>Lack of electric charging infrastructure</li> </ul>	 <ul style="list-style-type: none"> <li>The gate across the vehicle access would be moved further back into the site to an acceptable position without being automated. Whether an automated gate is provided in the future would be a matter for the management of the site.</li> <li>This would be managed through the Construction Logistics plan.</li> <li>Whilst this is not a planning matter the applicant has confirmed that the spaces are leased separately by the Council's housing team to a car/number plate which has to be registered as being kept at Atlanta Court.</li> <li>Electric vehicle charging points will be secured by condition</li> </ul>
<i>Environment</i>	
<ul style="list-style-type: none"> <li>Detrimental Impact on trees</li> <li>Harm to wildlife</li> <li>Increase vermin (e.g. rats/mice) from potential over spilling of rubbish bins.</li> <li>Further contamination investigation needed</li> </ul>	<ul style="list-style-type: none"> <li>Addressed in Sections 8.71 and 8.72</li> <li>The majority of the site is made up of garages and hard landscaping, with no real opportunities for wildlife habitats. The landscaping scheme would improve the biodiversity of the site.</li> <li>The amount of refuse storage proposed is in line with the Councils requirements for a development of 20 flats of this unit.</li> <li>Further studies will be secured by condition.</li> </ul>
<i>Non-material issues</i>	
<ul style="list-style-type: none"> <li>Vehicle right of way to parking area at the rear of the plot serving 57 Parchmore Road via the side of and to the rear of Atlanta Court (used by cars/minibuses/larger vehicles). Proposed development makes</li> </ul>	<ul style="list-style-type: none"> <li>The applicants have confirmed that there is no legally prescribed Right of Way to the rear of this property. Nonetheless, this is a private matter and not taken into account as part of the planning consideration.</li> </ul>

no or inadequate provision for ongoing use. There is no alternative means to access this area. Frontage off-street and on street parking is insufficient to cater for needs.	
<ul style="list-style-type: none"> <li>• Development will have a detrimental impact on property prices in the locality.</li> </ul>	<ul style="list-style-type: none"> <li>• This is not a material planning consideration.</li> </ul>

6.3 Cllr Paul Scott (Planning Committee Vice-Chair at the time of the referral) referred this and all applications submitted by Brick by Brick during the COVID-19 pandemic to Planning Committee for the following reasons:

- Public scrutiny of applications made by the Council and its wholly owned subsidiary.
- Openness and transparency during the Covid-19 crisis when stakeholders are likely to be distracted.
- Potential to provide new homes in response to the housing crisis in accordance with National, Regional and Local Planning Policy.

## 7 RELEVANT PLANNING POLICIES AND GUIDANCE

7.1 In determining any planning application, the Council is required to have regard to the provisions of its Development Plan so far as is material to the application and to any other material considerations and the determination shall be made in accordance with the plan unless material considerations indicate otherwise. The Council's adopted Development Plan consists of the Consolidated London Plan 2015, the Croydon Local Plan 2018 and the South London Waste Plan 2012.

7.2 Government Guidance is contained in the National Planning Policy Framework (NPPF), issued in February 2019. The NPPF sets out a presumption in favour of sustainable development, requiring that development which accords with an up-to-date local plan should be approved without delay. The NPPF identifies a number of key issues for the delivery of sustainable development, those most relevant to this case are:

- Delivering a sufficient supply of homes
- Promoting sustainable transport;
- Achieving well designed places.

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

### Consolidated London Plan 2016 (LP):

- 3.4 Optimising housing potential
- 3.5 Quality and design of housing developments
- 3.6 Play and informal recreation facilities
- 3.8 Housing choice
- 3.10 Definition of affordable housing
- 3.12 Negotiating affordable housing

- 3.13 Affordable Housing thresholds
- 5.2 Minimising carbon dioxide emissions
- 5.3 Sustainable design and construction
- 5.6 Decentralised energy in development proposals
- 5.7 Renewable energy
- 5.9 Overheating and cooling
- 5.10 Urban greening
- 5.11 Green roofs and development site environs
- 5.12 Flood Risk Management
- 5.13 Sustainable drainage
- 5.15 Water use and supplies
- 5.21 Contaminated land
- 6.3 Effects of development on transport capacity
- 6.9 Cycling
- 6.10 Walking
- 6.12 Road Network Capacity
- 6.13 Parking
- 7.1 Lifetime neighbourhoods
- 7.2 An inclusive environment
- 7.3 Designing out crime
- 7.4 Local character
- 7.5 Public realm
- 7.6 Architecture
- 7.14 Improving Air Quality
- 7.15 Reducing and managing noise
- 7.21 Trees and Woodland
- 8.2 Planning obligations
- 8.3 Community infrastructure levy

### Croydon Local Plan 2018

- SP1.1 Sustainable Development
- SP1.2 Place making
- SP1.3/SP1.4 Growth
- SP2.2 Quantities and locations
- SP2.3-2.6 Affordable Homes
- SP2.7 Mix of Homes by Size
- SP2.8 Quality and standards
- DM1.1 Provision of 3 or more beds
- SP4.1-4.2 Urban Design and Local Character
- DM10 Design and Character
- DM13 Refuse and recycling
- DM14 Public art
- DM16.1 Promoting healthy communities
- SP6.1 Environment and Climate Change
- SP6.2 Energy and CO2 Reduction
- SP6.3 Sustainable Design and Construction
- SP6.4 Flooding
- DM23 Development and construction
- DM24 Land contamination

- DM25.2 Flood resilience
- DM25.3 Sustainable drainage systems
- SP7.4 Biodiversity
- DM27 Protecting and enhancing our biodiversity
- DM28 Trees
- SP8.3-8.4 Development and Accessibility
- SP8.6 Sustainable Travel Choice – pedestrians
- SP8.7 Sustainable Travel Choice – cycle
- SP8.12-SP8.13 Motor Vehicle Transportation
- SP8.16/17 Parking
- DM29 Promoting sustainable travel and reducing congestion
- DM30 Car and cycle parking in new development

### Emerging New London Plan

- 7.4 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 New London Plan remains at an advanced stage of preparation but full weight will not be realised until it has been formally adopted. Despite this, in accordance with paragraph 48 of the NPPF substantial weight can be applied to those policies to which the Secretary of State has not directed modifications to be made.
- 7.5 The Mayor in his Intend to Publish New London Plan has accepted a reduced Croydon's overall 10 year net housing figures from 29,490 to 20,790 homes, with the "small sites" reduced from 15,110 to 6,470 homes. Crucially, the lower windfall housing target for Croydon (641 homes a year) is not dissimilar to but slightly larger the current adopted 2018 Croydon Local Plan target of 592 homes on windfall sites each year.
- 7.6 It is important to note, should the Secretary of State support the Intend to Publish New London Plan, that the overall housing target in the New London Plan would be 2,079 new homes per annum (2019 – 2029) compared with 1,645 in the Croydon Local Plan 2018. Therefore, even with the possible reduction in the overall New London Plan housing targets, assuming it is adopted, Croydon will be required to deliver more new homes than our current Croydon Local Plan 2018 and current London Plan (incorporating alterations 2016) targets.
- 7.7 The policies of most relevance to this application are as follows (policies subject to SoS modifications are highlighted):
- GG1 Building strong and inclusive communities
  - GG2 Making the best use of land
  - GG3 Creating a healthy city
  - GG4 Delivering the homes Londoners need
  - GG5 Growing a good economy
  - GG6 Increasing efficiency and resilience
  - D2 Infrastructure requirements for sustainable densities
  - D3 Optimising site capacity through the design-led approach (subject to SoS modification)
  - D4 Delivering good design
  - D5 Inclusive design
  - D6 Housing quality and standards

- D7 Accessible housing
- D11 Safety, security and resilience to emergency
- D12 Fire Safety
- D14 Noise
- H1 Increasing housing supply (subject to SoS modification)
- H2 Small Sites (subject to SoS modification)
- H4 Delivering Affordable Housing
- H5 Threshold approach to applications
- H6 Affordable housing tenure
- H10 Housing size mix (subject to SoS modification)
- S4 Play and informal recreation
- E11 Skills and opportunities for all
- G1 Green infrastructure
- G5 Urban greening
- G6 Biodiversity and access to nature
- G7 Trees and woodlands
- SI1 Improving air quality
- SI2 Minimising greenhouse gas emissions
- SI3 Energy infrastructure
- SI4 Managing heat risk
- SI5 Water infrastructure
- SI12 Flood risk management
- SI13 Sustainable drainage
- T1 Strategic approach to transport
- T2 Healthy streets
- T4 Assessing and mitigating transport impacts
- T5 Cycling
- T6 Car parking
- T6.1 Residential parking (table 10.3 subject to SoS modification)
- T7 Deliveries, servicing and construction
- T9 Funding transport infrastructure through planning
- DF1 Delivery of the plan and planning obligations

7.8 There is relevant Supplementary Planning Guidance as follows:

- London Housing SPG March 2016
- Croydon Suburban Design Guide Supplementary Planning Document April 2019

## **8 MATERIAL PLANNING CONSIDERATIONS**

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

1. Principle of development
2. Density, Housing Mix and Affordable Housing
3. Townscape, Design and Visual Impact
4. Impact on adjoining occupiers
5. Quality of living environment provided for future residents
6. Parking and highway safety
7. The environmental performance of the proposed building

8. Environment
9. Other planning matters

### **Principle of development**

- 8.2 The site consists of garages and a parking area and the site is not offered any specific protection from a land use policy perspective. Subject to a satisfactory re-provision there is no objection to the loss of parking spaces. The Council's housing policies seek to maximise the re-use of previously developed land and buildings. However, they also require a balance to be struck between developing land for more efficient housing use and protecting character/heritage/residential amenity etc. Subject to meeting the objectives of other relevant criteria and policies as set out below, a residential use in this location is acceptable.

### **Density, Housing Mix and Affordable Housing**

#### Density

- 8.3 Policy 3.4 of the London Plan states that in taking into account local context and character, the design principles in Chapter 7 and public transport capacity, development should optimise housing output within the relevant density range shown in Table 3.2. Based on the public transport accessibility level (PTAL 4) and the site's urban characteristics, the London Plan density matrix suggests a residential density of between 200-700 habitable rooms per hectare and 45-260 units per hectare for the application site. The residential density of the proposal would be 649 habitable rooms per ha or 236 units per hectare, so within the thresholds.

- 8.4 Both the calculations fall within the prescribed ranges identified above. Nonetheless, it should be noted that the Mayor's Housing SPG, at paragraph 1.3.8, states that the density ranges should be "*used as a guide and not an absolute rule, so as to also take proper account of other objectives*". The SPG (1.3.51) does not preclude developments with a density above or below the suggested ranges, but requires that they are tested against factors relating to different aspects of a proposal (design principles; location to social and public transport, high quality design in terms of liveability, contribution to place making, dwelling mix an type, management and design of waste/cycle parking facilities and whether proposals are in the types of accessible locations the London Plan considers appropriate for higher density development (eg. opportunity areas)). Such elements are assessed elsewhere in this report.

#### Housing Mix

- 8.5 Croydon Local Plan 2018 policy SP2.7 sets a strategic target for 30% of all new homes up to 2036 to have three or more bedrooms. Policy DM1.1 allows for setting preferred mixes on individual sites via table 4.1. Applying table 4.1 to this site (urban setting with a PTAL of 4, 5, 6a or 6b) shows a requirement of 40% 3+ bedrooms units unless there is agreement from an affordable housing provider (that these are not viable or needed)

or within the first 3 years of the plan where a viability assessment demonstrates that larger homes would not be viable, an element may be substituted by two bedroomed, four person homes.

- 8.6 The proposed mix for the development is 14 x 1b2p (70%) and 6 x 2b4p (30%). Zero 3+beds would be provided which is well below the minimum requirement. When factoring in the 2 bedroom 4 person units, of which there are 6, the percentage rises to 30% and therefore the proposed proportion of family housing meets the strategic target. A viability report submitted in support of the application also demonstrates that a policy-compliant unit mix providing 40% of the homes as 3B5P cannot be viably supported and this position is accepted. It is acknowledged that the individual site target of 40% is not achieved, however, the scheme proposes 100% affordable housing and given the pressing need for affordable accommodation it is considered that the housing mix is acceptable on balance and would not warrant a reason for refusal.

#### Affordable Housing

- 8.7 The CLP (2018) states that to deliver affordable housing in the Borough on sites of ten or more dwellings, the Council will negotiate to achieve up to 50% affordable housing, subject to viability and will seek a 60:40 ratio between affordable rents homes and intermediate (including shared ownership) homes unless there is an agreement with a Registered Provider that a different tenure split is justified.
- 8.8 The application proposes 100% affordable housing and all to be affordable rented units. A viability report was submitted that tested a number of alternative 'policy compliant' scenarios (40% of the homes as 3B5P or as 2B4Ps, as well as providing a 60:40 tenure split) and demonstrated the negative viability impact of providing these was greater than the proposed mix. This document has been reviewed and accepted.

It is acknowledged that the housing split is weighted to 1 bedroom units, however, there is not a lack of demand for these homes. Whilst single occupancy units do tend to have higher support needs and help to manage their tenancies this is not strictly a planning matter.

- 8.9 Overall, it is considered that the scheme would provide an acceptable range of homes and would positively contribute to the delivery of new affordable homes. The affordable housing offer would be secured through a S106 planning obligation.

### **Townscape, Design and Visual Impact**

#### Massing

- 8.10 The site currently consists of single storey garage block to the west and hardstanding and green space to the south and east. The existing building, Atlanta Court, has a 5 storey street facing element with a 3 storey wing to the east. It is proposed that the site would be redeveloped through the erection of a flat roofed building four storeys in height. An 1100mm parapet has been included to help screen roof top PV's. Whilst this adds some extra height to the development it provides a cleaner roof level appearance and is supported. Overall the massing of the building would be acceptable in principle, particularly given the existence of Atlanta Court.

#### Site Layout

- 8.11 The proposed site layout retains existing accesses to the rear of the site. This area will have locked bollards to prevent other cars from accessing it. Generally, it is positive

that parking has been consolidated. The building sits well in the rear of the site not appearing overly dominant within the plot or surrounds.

8.12 Pedestrians will have access around and through Atlanta Court. The dashed orange line in the figure below shows the possible routes to the front door of the proposed building from Parchmore Road.



Fig 4: Pedestrian routes to the proposed development

8.13 Some of the cycle storage has been integrated within the main building envelope which is supported. Ideally all of the refuse and cycle stores would be integrated, however, there is a significant amount to be accommodated and to achieve this would likely jeopardise the quality of the design. The location of the external bicycle and refuse stores works well for occupiers and the latter for collection purposes.

### Architectural Expression



Fig 5: CGI of the front of the scheme



- 8.14 Atlanta Court has a horizontal emphasis and is composed of a white fixed panel system. The fenestration alternates across floors. The proposed building makes some reference to the existing building in its design. It also references the wider context through arched window head detailing and the overall effect is that the appearance is of a high quality.
- 8.15 The use of red brick as a primary facing material is acceptable. Projecting headers will add architectural interest to the elevations. The use of gold tone metalwork to balconies, windows, doors and brise soleil is supported, as is the metal cladding to ground floor level. The subtle use of this adds visual interest across the building. Added depth and relief to the façade can be achieved through generous window reveals and slim profile frames. There is some render to the recesses on the rear of the building, which given the location, is acceptable in this instance.

#### Landscaping

- 8.16 The overall landscaping strategy, including lighting, has been developed well; the precedents for hard and soft landscaping are acceptable. Detailed landscape design would be secured by condition.

#### **Impact on adjoining occupiers**

- 8.17 Given the rear location of the development a number of adjoining occupiers would potentially be affected by the development. Croydon's Suburban Design Guide SPD states that a minimum separation distance of 18 metres is required between facing habitable room windows of the proposed building and all other surrounding properties. In addition, the first 10 metres of the rear gardens perpendicular to the proposed building would need to be protected. These requirements are met and expanded on below.



*Fig 6: Aerial photograph looking south*

#### Outlook & Privacy

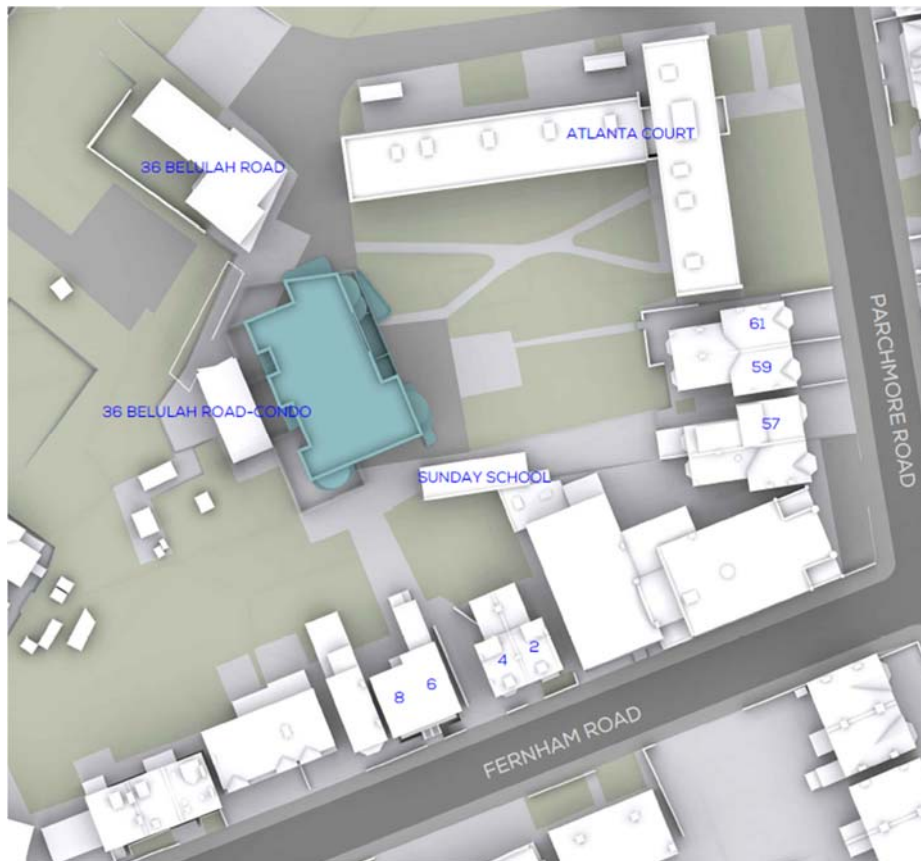


Fig 7: Plan showing adjoining occupiers

*Atlanta Court*

8.18 The building is 10m away from western spine of Atlanta Court at its nearest point (corner to corner), but is sited at an angle and mainly perpendicular so that there is no direct overlooking of the nearest parts of the building. Whilst there may be some overlooking, including from the balconies, this would be at an angle, and as such the orientation and distance is sufficient to prevent any harmful loss of privacy or outlook to the occupiers of Atlanta court sufficient to warrant a refusal. The eastern spine is 44m away at its closest point which is acceptable. Some overlooking and similar relationships between buildings are not uncommon in built up urban areas and the perpendicular relationship (albeit without the balconies) is evident on Atlanta Court itself.

*57, 59 & 61 Parchmore Road*

8.19 Although there are windows on all levels facing towards these two properties, the proposed building is 7m from the end of the rear garden boundary and 37m from No. 59 and No.61 respectively. Whilst there would be some overlooking, it would be mainly over the end of the gardens. The more private outdoor space to the rear of the houses and the houses themselves are sufficiently removed for there to be no harmful loss of privacy or outlook. 57 Parchmore Road is not directly overlooked and also sufficiently separated, by 38m, for the occupiers not to suffer a material harm to the amenities.

*Methodist Church Fernham Road*

8.20 The building is in close proximity to the rear of the church, however, given the neighbouring uses no harmful loss of privacy is envisaged.

*2-8 Fernham Road*

8.21 Whilst there are windows facing towards these neighbours, the proposed building is approximately 25m and 30m from the rear of No.s 2/4 and 8 Fernham Road

respectively. No.6 does have a deeper element, but would still be sited 22m away, furthermore, the rear elevation at this point is only served by a door. These distances are sufficiently to preclude any harmful loss of privacy or outlook to the occupiers.

#### *10 Fernham Road*

- 8.22 This residential property is deeper than the neighbours so the separation distance is around 20m from the rear of the proposed building, although it is not in direct alignment. The west elevation of the proposed scheme would be close to, and overlook, the end part of the rear garden. Given the positioning and distance, no harmful loss of outlook or privacy is envisaged to this neighbouring house and private space to the rear. The overlooking of the back part is regrettable, however, given this property benefits from a long rear garden and the first 10m area protected, this in itself is not sufficient to warrant a refusal reason.

#### *No.12-16 Fernham Road*

- 8.23 The closest of these is at least 31m so no harmful overlooking or loss of outlook would occur. There would be some overlooking of the back part of the rear gardens, but, similarly to No.10, these properties also benefit from long rear gardens and any loss of privacy to this area would not warrant a refusal reason.

#### *Beulah Road*

- 8.24 Properties on Beulah Road are significantly separated as all the properties close to the proposed building benefit from long rear gardens. The nearest point of the closest neighbouring building, No.28, is 47m away, which is more than adequate to preserve outlook and privacy to the occupiers.

#### *Consented application at the rear of 36 Beulah Hill*

- 8.25 Whilst the proposed development would be within 7.5m (at its nearest point) of the northern block of the approved scheme it has been designed so that there is no direct overlooking (see image below), and as such no harmful loss of privacy is envisaged. The orientation of these two blocks in relation to each other also means that a sense of openness will remain and outlook for the occupiers of rear of 36 Beulah Hill would not be significantly harmed.



*Fig 8: consented development at 36 Beulah Hill*

- 8.26 There is also a single unit on land further to the south, which abuts the boundary with the subject development. There are 4 flank windows facing the site, however, these serve the entrance area, staircase and bathroom area, whereas the main outlook for the habitable rooms is not towards the subject site, as such there would be no loss of outlook. The neighbouring single unit building would have 3 rooflights (on a curved roof). Some overlooking could occur to this property, however, these roof lights do not face towards the proposed development and the curved nature of the roof would further limit any loss of privacy. There would also be views into the garden, but given the built up area this would not warrant a refusal reason.

Overall the impact on this neighbouring scheme (should it be constructed) would be acceptable.

### Daylight and Sunlight

- 8.27 A Daylight and Sunlight assessment has been submitted with application. This shows that all the adjacent residential premises would retain sufficient natural light to comply with BRE guidance or would suffer moderate adverse impacts (Atlanta Court and unimplemented scheme at rear of 36 Beulah Road).

#### *Atlanta Court*

- 8.28 In terms of daylight all windows passed the No Sky Line (NSL) method and 247 (96%) of 256 windows tested on Atlanta Court using the Vertical Sky Component method (VSC) passed. Of the 9 windows that fall short (outlined red in the image below) 1 window would have a minor adverse 20-30% reduction (closest to the flank wall) and 8 would have a moderate adverse 30-40% reduction.



*Fig 9: western face of Atlanta Court VSC window failures*

- 8.29 All these windows are on the frontage part of Atlanta Court, at ground floor level and positioned directly beneath an overhang meaning that they have existing low levels to start with (e.g. below 6%). Therefore the impacts, although high in terms of a percentage, would be less noticeable in reality. In addition the 9 windows are spread across different flats and there is not one flat that has all its windows fail. Moreover, all the flats are dual aspect with the opposing side unaffected by the proposed development. Whilst a loss of light would occur, which is regrettable, it is not so significant to warrant a refusal reason, particularly given the impact overall is moderate and the NPPF direction on having a flexible approach in applying policies or guidance relating to daylight and sunlight when schemes make an efficient use of land, which this development would. In terms of sunlight all windows will remain compliant with BRE targets for annual and winter sunlight.

- 8.30 There is a negligible lighting impact on the large outdoor amenity area serving Atlanta Court.

#### *Scheme to the rear of 36 Beulah Road*

- 8.31 In terms of daylight (average daylight factor) to the block of 9 flats there is only a minor shortfall within two of the living/kitchen/dining rooms, both located on the ground floor. However, this is a minor shortfall. In terms of sunlight this block would receive levels compliant with BRE guidelines.

- 8.32 The scheme at 36 Beulah Road also includes a single unit two-bedroom detached house immediately abutting the western boundary of the site. In terms of daylight impacts, only the living/kitchen room on the ground floor falls short of the target achieving 1.3%, however, this room is already below the standard without the proposal in place achieving by 1.6% (against the target of 2%). Although the proposal would create a negative impact, this is a moderate adverse impact and to one room and as such is not considered to warrant a refusal. The side facing windows which serve this unit are not within 90-degrees of due south and are not therefore relevant for sunlight assessment, nonetheless these windows do not serve habitable room. Sunlight to the outdoor space of this property meets the BRE targets.
- 8.33 All other surrounding residential buildings comply with BRE daylight and sunlight guidance.

#### Noise and disturbance

- 8.34 There would be a greater level of activity, both around and through the existing site, but given the residential nature would be in keeping with the surroundings, it is not considered that this would be out of character of unneighbourly or unreasonably harmful to neighbouring occupiers.
- 8.35 Residential windows would face towards the rear part of the neighbouring Methodist Church to the south, however, it is not uncommon for such uses to be in close proximity within urban areas and it is not considered that they are incompatible with regard to noise and disturbance.
- 8.36 Refuse and cycle storage would be located to the rear of No.36 Beulah Road and the end of Atlanta Court. It is envisaged that the boundary screening (between No.36), separation (with Atlanta Court) and infrequent use of these structures would prevent any harmful noise and disturbance to the neighbour occupiers.

#### Other matters

- 8.37 It is likely that some of the play space will need to be accommodated on the existing shared amenity area to the rear of Atlanta Court (expanded on below). Provided the play facilities are suitably removed from windows then there would be no significant harm from this aspect of the scheme. The play facilities would be secured by condition.
- 8.38 The application involves the re-location of washing lines to accommodate car parking. Although shown in the southern corner, the design and access statement states that this will be agreed with residents going forward. The replacement washing lines can be secured by way of a condition.

#### **Quality of living environment provided for future residents**

- 8.39 Policy 3.5 of the London Plan states that new residential units should provide the highest quality internal environments for their future residents and should have minimum floor areas in accordance with the Government's technical housing standards set out in Table 3.3 and recognises that a genuine choice of homes should be provided in terms of both tenure and size. Detailed residential standards are also contained within the Mayor's London Housing SPG.
- 8.40 Policy 3.8 of the London Plan further states that 10% of new residencies within a development should be wheelchair accessible or easily adaptable for residents who

are wheelchair users. Provision should also be made for affordable family housing, wheelchair accessible housing and ensure all new housing meets parts M4 (2) and (3) of the Building Regulations.

- 8.41 Croydon Local Plan policy DM10.4 has a number of requirements in relation to providing private amenity space for new residential development. The relevant policy points seek a high quality design; a functional space, a minimum amount (5sq m per 1-2 person unit and extra 1m<sup>2</sup> per person after that), minimum of 10m<sup>2</sup> per child of new play space and encouraged adherence with SPD 3 Designing for Community Safety.
- 8.42 The London Housing SPG provides further details in relation to housing standards, including in relation to the provision of dual aspect units. Housing SPG standard 29 states that developments should avoid single aspect units which are north facing, have three or more bedrooms, or are exposed to a particularly poor external noise environment. Standard 12 states that generally each core should be served by no more than 8 dwellings per floor.
- 8.43 All of the proposed units would meet the National Technical Housing Standards in terms of size, are no more than 5 dwellings on a floor and all have adequate private outdoor space, either via a garden or balcony area. Two units on each floor are not dual aspect, however, these all face south west, which make them acceptable. A daylight and sunlight assessment for future occupiers demonstrated that all bar one room (out of 46) would receive good levels of daylight. The room that fell short was a kitchen/living room, and only by 0.5%. Overall the units would have a very good level of daylight. In terms of sunlight 23 rooms would receive the target level for sunlight. 23 rooms do not, however, 18 of these are bedrooms, which are acknowledged as less important for sunlight. The other 5 rooms serve kitchen/living rooms. Whilst this is not ideal, the scheme has been designed to minimise north facing units. Overall, particularly given the high daylight levels to all rooms, future users would receive adequate levels of light especially when a flexible approach is required by national guidance when development makes efficient use of the land.
- 8.44 Two of the five private outdoor spaces meet the recommendations within the BRE Guidelines for overshadowing of outdoor spaces. The remaining three gardens will fall short due the orientation of the proposal, proposed neighbouring scheme and boundary treatment, which restricts direct sunlight. The communal outdoor space, would however, achieve good levels of lighting in accordance with BRE.
- 8.45 The layout has been designed in such a way that there would be no inter-overlooking. Flats 1 and 5, located on the ground floor, are the two units which face towards the access way and centre of the estate. Flat 1 has a rear garden that is not overlooked and a defensible area of landscaping to living/kitchen rooms so that there is no harmful loss of privacy. Flat 5 also has a defensible area of landscaping protecting the living/kitchen room and bedroom from loss of privacy and an amenity area in a less prominent position.
- 8.46 A lift has not been provided within the block and justified by the viability assessment that concludes that the cost of including a lift would be unsustainable for the viability of this scheme. The assessment concludes that the provision of a lift would impact the delivery of the development as whole and place financial maintenance implications on future affordable housing and would reduce the floor area internally, which is, on balance, accepted.

8.47 10% (two units - 4 and 5) would meet Building Regulation requirement M4(3) 'wheelchair user dwellings', which meets the 10% target and all the other ground floor units are accessible and adaptable dwellings in accordance with M4(2). The Policy and Housing SPG requirements outlined above are not met in relation to M4(2), but given M4(3) is met and the negative viability consequences of making all units M4(2), the access provision is acceptable on balance.

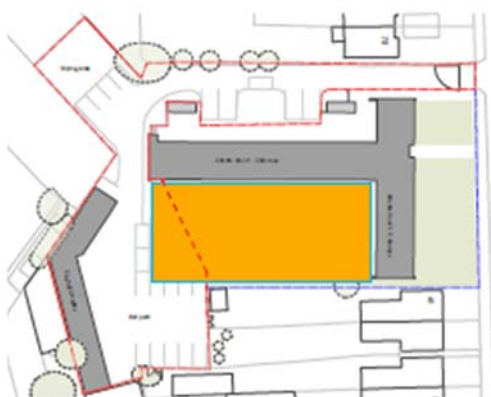
8.48 Overall, on balance, the development would provide acceptable living accommodation to the future occupants.

#### Private/Communal Amenity Space and Child Play Space Provision

8.49 Policy 3.6 of the London Plan states that housing development proposals should make a provision for play and informal recreation for children and young people. The development is required to make appropriate play provisions in accordance with a GLA formula and calculation tool, whereby 10sqm of play space should be provided per child.

8.50 Based on the current unit breakdown and as per the SPG, the child yield is expected to be 8.7 children requiring 86.5sqm of play-space (The Croydon Local Plan 2018 requires a minimum play space of 59.8sq m). Whilst there is currently 877 sq m of shared green amenity space within the whole estate (red and blue areas) the proposal only increases this by 38 sq m (to 915 sq m), which is an under provision of 48.5 sq m, and in most circumstances would not provide adequate play space.

*Fig 10: Existing grassed amenity space*



*Proposed outdoor amenity space*



8.51 However, the policy is for the provision of play space and not for new landscaping. As such, the part of play space that cannot be accommodated within the application area could be provided within the land that is outside of the application site, but within the same ownership (blue area) and secured by condition. Section 72(1) of the 1990 Town and Country Planning Act provides the power to impose conditions on land within the red and blue line land areas.

8.52 On this basis there is sufficient space within the blue edge area to accommodate the remaining 48.5 sq m requirement of play space. This can also be achieved without compromising the outdoor space for the existing residents of Atlanta Court. If assessed against current policy (and calculator) the child yield for Atlanta Court (based on 2 x studios (1 beds), 25 x 2 beds, 4 x 3 beds and 1 x 4bedroom units) is 34.1 children and would require 341.3 sq m of play space.

8.53 The outdoor space could accommodate the play space requirements for both the existing residents of Atlanta Court and future residents of the proposed scheme, whilst still retaining space for other outdoor activities. Moreover, the site would benefit from new play space facilities dramatically improving upon the existing space. Any matters relating to servicing and management from the encroachment into the blue area would be for the respective land owners.

## **Parking and highway safety**

### Car parking

- 8.54 The planning application was supported by a Transport Statement (TS), which used the Lambeth methodology for the parking surveys. It states that the existing site has 22 hard standing car parking spaces and 16 garages. In terms of usage 10 cars were observed as parking in the hardstanding parking bays across surveys undertaken. 10 of the garages are let (6 void), two of which are leased to residents in the existing block. The two garages used by existing occupiers and the 10 hardstanding spaces will be re-provided as part of the development, totalling 12 spaces. In terms of the proposed development and applying census data 9 parking spaces would be required. This creates a total requirement of 21 car parking bays proposed on-site, including one disabled bay. A condition will be applied to secure the disabled parking bay and electric vehicle charging points for them.
- 8.55 The parking surveys in the TS show that on street parking is at 94% in the unrestricted parking areas. Given that Croydon Council's assessment of a 'high stress area' is at 85%, the site is at high parking stress and there is very limited capacity for additional on-street parking. The site is located close to a controlled parking zone (Thornton Heath permit zone) where parking is restricted to permit holders only.
- 8.56 Car parking has been provided on-site to a sufficient level to ensure that the demand for car parking from the existing and future residents is catered for based on census data. There is some concern that the census data is nearly 10 years, however, given the PTAL rating of 4 (good) and that the applicants have committed to provide a nearby off site car club space with EVCP (the equivalent financial contribution would be £14,675), will fund future residents to have membership of a car club (for 3 years) and together with the objectives of a Travel Plan (which would promote sustainable travel) alleviates concerns related to any possible parking overspill. The S106 will also have a clause that restricts future residents from applying for parking permits if the CPZ was to be extended and this site fell within it. The Council highway team have confirmed that this CPZ has the potential to be extended (but the decision making for this falls outside of the planning remit).
- 8.57 A Car Park Management Plan for the effective operation of the car park would be secured by condition and is considered appropriate so that existing and future residents are clear on the parking arrangements and do not inconvenience each other. Swept paths have been submitted to show that car parking spaces can be suitably manoeuvred into and out of.

### Cycle and Refuse Storage

- 8.58 Space for cycle parking (designed to accommodate 110 cycles) would be provided which would accord with the emerging New London Plan standards. Details would need to be approved as part of a planning conditions discharge process. With regards to refuse, sufficient space has been proposed, including for bulky goods storage, for the development. Specific details can be secured by planning condition. Swept paths



show that a refuse truck can enter, turn and exit safely. Given that the location of the refuse stores is beyond 20m from the highway the drive leading to the bin store needs to be up to highway standard, this can be secured by condition.

#### Other Highway Impacts

- 8.59 Access arrangements to the application site would remain unaffected other than the white bollards on the access road are required to be removed and the gate relocated for safety reasons, conditions would secure appropriate details.
- 8.60 Pedestrian access can be achieved through either the side path or through the front element of Atlanta Court and then across the existing outdoor space, which avoids the main access road, the final details can be secured by condition.
- 8.61 Swept path drawings show that a fire truck can also enter the site and gain access to the proposed development.
- 8.62 Given the location of the site next to Atlanta Court it would be prudent to condition a Demolition and Construction Logistics Plan to be submitted, which can include a commitment to surveying the condition of the public highway prior to any works commencing on site.
- 8.63 Although not a planning matter suitable vehicular access arrangements have been to the rear of No.61 Parchmore Road.

#### **The environmental performance of the proposed building**

- 8.64 Policies 5.2 and 5.3 of the London Plan state that development proposals should minimise carbon dioxide emissions and exhibit the highest standards of sustainable design and construction, whilst policy 5.7 states that they should provide on-site renewable energy generation. London Plan policy 5.5 states that Boroughs should seek to create decentralised energy networks, whilst Policy 5.6 requires development proposals to connect to an existing heating network as a first preference if one is available. London Plan policy 5.9 overheating seeks to reduce potential overheating and reliance on air conditioning in. Mayors Housing SPG, residential developments should seek to achieve zero carbon. The Housing SPG defines 'Zero Carbon' homes, as homes forming part of Major development applications where the residential element of the application achieves at least a 35% reduction in regulated carbon dioxide emissions (beyond Part L 2013) on site.
- 8.65 Croydon Local Plan 2018 policy SP6.2 expects that high density residential development of 20 units or more would (a) incorporate site wide communal heating systems, and (b) that major development will be enabled for district energy connection unless demonstrated not to be feasible or financially viable to do so.
- 8.66 Croydon Local Plan 2018 policy SP6.3 seek high standards of sustainable design and construction from new development to assist in meeting local and national CO2 reduction targets. This will be achieved by (only relevant criterion listed in relation to performance of the building):
- b) Requiring new-build residential development of 10 units or more to achieve the London Plan requirements or National Technical Standards (2015) for energy performance, whichever the higher standard;
  - c) Requiring all new-build residential development to meet a minimum water efficiency standard of 110 litres/person/day as set out in Building Regulations Part G;

h) Positively contribute to improving air, land, noise, and water quality by minimising pollution.

8.67 A communal heating system has not been included as it is not financial viable for a scheme of 20 units and there is limited space for a suitable plant room. Accordingly each flat will be serviced by an individual air source heat pump (ASHP) to provide heating and hot water. Given this the scheme would not be able to connect to a district heating system, however, it is also appreciated that the site is not close to the Croydon Metropolitan Centre, where district heating is achievable in the future. On-site renewable energy generation will be provided through the use of roof mounted photovoltaic panels and ASHP's that will contribute to the CO2 reductions.

8.68 The energy efficient measures create a total carbon dioxide savings of 72%. These savings fall short of the residential policy requirement of zero. The Council would accept a cash in lieu payment to be secured through a S106 legal agreement. Whilst the building would not connect to a district heating system, it achieves excellent carbon dioxide savings and on balance is acceptable.

8.69 In addition to the prevention of overheating, high energy efficiency and fabric performance, the dwellings will also have a water consumption limit of 110 litres/person/day using water efficiency fittings and secured by condition.

## **Environment**

### Surface Water, Drainage and Flooding

8.70 London Plan Policy 5.3 states that development proposals should demonstrate that sustainable design standards are integral to the proposal and that major developments meet the minimum standards within the Mayor's SPG. This aims to achieve a variety of measures including minimising urban runoff and avoid impacts from natural hazards (including flooding). Policy 5.12 states that development proposals must meet flood risk assessment and management requirements. London Plan Policy 5.13 states that development should utilise SUDS, aiming to achieve greenfield run off rates and that surface water run-off is managed as close to its source as possible, in line with a drainage hierarchy.

8.71 The London Plan Sustainable Design and Construction Supplementary Planning Guidance (2014) supports that developers will be expected to clearly demonstrate how all opportunities to minimise final site runoff, as close to greenfield rate as practical, have been taken. The minimum expectation for development proposals is to achieve at least 50% attenuation of the site's (prior to re-development) surface water runoff at peak times.

8.72 Croydon Local Plan policy SP6.4 seeks to reduce flood risk, protect groundwater and aquifers and minimise all forms of flooding. Policy DM25.1 seeks to reduce flood risk and minimises the impact of flooding. Policy DM25.3 requires sustainable drainage systems in all development.

8.73 The risk from flooding is generally low, albeit, there is a medium risk from surface and ground water flooding. A flood risk assessment, drainage statement and ground investigation have been submitted with the application and reviewed by the Lead Local Flood Authority. The Lead Local Flood Authority have considered the information and found it to be acceptable subject to the inclusion of pre-commencement conditions which require the submission of detailed drainage information. Thames Water have

also not objected to the scheme and suggest conditions and informatives, all of which have been include in the recommendation.

#### Nature Conservation and Trees

- 8.74 London Plan Policy 7.19 states that development proposals should, where possible, make a positive contribution to the protection, enhancement, creation and management of biodiversity. London Plan Policy 7.21 states that existing trees of value should be retained and any loss as the result of development should be replaced following the principle of 'right place, right tree'. Wherever appropriate, the planting of additional trees should be included in new developments, particularly large-canopied species.
- 8.75 Croydon Local Plan policy SP7.4 states that the Council will seek to enhance biodiversity across the borough. Policy DM27 seeks to enhance biodiversity across the borough and improve access to nature. Policy DM28 states that the Council will seek to protect and enhance the borough's woodlands, trees and hedgerows by: a) Ensuring that all development proposals accord with the recommendations of BS5837 2012 (Trees in relation to design, demolition and construction) or equivalent; b) Not permitting development that results in the avoidable loss or the excessive pruning of preserved trees or retained trees where they make a contribution to the character of the area; c) Not permitting development that could result in the future avoidable loss or excessive pruning of preserved trees or trees that make a contribution to the character of the area; and d) Not permitting development resulting in the avoidable loss or deterioration of irreplaceable habitats, including ancient woodland, hedgerows and veteran trees; and e) Producing a tree strategy outlining how the local authority will manage its tree stock and influence the management of those trees subject to a Tree Preservation Order.
- 8.76 There are a number of trees located offsite along the site boundaries that may be affected by the development, although none of these are Category A trees. No trees are to be removed as part of the development, but some require minor pruning, which could be carried out in accordance with common law rights and is accepted.
- 8.77 There are no tree related objections to the scheme, subject to the proposed tree protection plan being adopted which can be secured by condition.
- 8.78 There is limited space for soft landscaping, but planting to borders and the fronts of the existing and proposed buildings, facing the shared space, will provide an attractive setting, especially alongside the improvement to the visual appearance of the hard standing (block paving). The details of both the soft and hard landscaping will be secured by condition.

#### Noise, Light and Air

- 8.79 The Councils Environment Consultant has raised no objection to this aspect of the proposals. Subject to a condition restricting any air handling units/plant/machinery to 10dB below existing background noise levels and acoustic design standards to the living and bedrooms then noise impacts would be acceptable.
- 8.80 Given the site is located close to the Methodist Church and associated buildings it is important that the development takes responsibility for mitigating impacts from existing noise-generating activities or uses, in accordance with the agent of change philosophy. A robust noise assessment is recommended to ensure adequate sound mitigation to the new development.

- 8.81 External lighting is proposed, mainly, to car parking, entrance and bike/refuse storage. Whilst the principle of this is acceptable light from the proposed illuminations can cause a nuisance to local residents and as such the final details can be secured by condition.
- 8.82 The whole of Croydon Borough has been designated as an Air Quality Management Area and therefore a contribution is required towards local initiatives and projects in the air quality action plan which will improve air quality targets helping to improve air quality concentrations for existing and proposed sensitive receptors.
- 8.83 As a major development, the construction phase would involve large scale operations and is likely to be elongated, there is the potential for adverse environmental effects, including noise. A construction environment management plan and Construction logistics plan to be agreed prior to development.

#### Ground Conditions and Contamination

- 8.84 London Plan Policy 5.21 states that appropriate measures should be taken to ensure that development on previously contaminated land does not activate or spread contamination.
- 8.85 Croydon Local Plan 2018 SP6.3 criterion h) requires development to positively contribute to improving air, land, noise and water quality by minimising pollution.
- 8.86 Policies DM24.1-DM24.3 relate to land contamination and development proposals located on or near potentially contaminated sites. Such sites need to be subjected to assessments and any issues of contamination discovered should be addressed appropriately e.g. through conditions.
- 8.87 Desktop and ground investigation studies have been carried out, with the former satisfactory, but the scope for intrusive investigation works is insufficient. However, a further intrusive site investigation report into contamination can be secured by condition prior to development.

#### **Other planning matters**

- 8.88 Croydon Local Plan policy SP3.14 and the planning policy including the adopted Section 106 Planning Obligations in Croydon and their Relationship to the Community Infrastructure Levy – Review 2017 sets out the Councils' approach to delivering local employment for development proposal. The applicant has agreed to a contribution and an employment and skills strategy.
- 8.89 A fire statement has been submitted which demonstrates how the proposed scheme can achieve compliance with Building Regulations.
- 8.90 The scheme would ensure the creation of a healthy community with access to open space, promote cycling and walking and improving a portion of the site for child playspace and community interaction for existing and future occupiers.
- 8.91 The development will be liable for a charge under the Community Infrastructure Levy (CIL). This payment will contribute to delivering infrastructure to support the development of the area, such as local schools.

## Conclusions

- 8.92 Whilst it is accepted that the scheme would result in the loss of existing garaging, there is no justification to retain such uses especially in view of the urgent need to deliver more homes and specifically affordable homes. The scheme will deliver family homes, contributing to the 30% strategic target, albeit not the local target of 40%.
- 8.93 The design of the proposals has been well considered in terms of layout, scale, mass, external appearance and landscaping. The flats would all comply with internal space standards, many dual aspect and would provide a high standard of accommodation overall. The impact of the development on immediate neighbours is acceptable mainly due to appropriate separation distances and the orientation of the scheme. Sufficient parking spaces have been provided alongside a commitment to improving sustainable transport measures. Any environmental impacts can be suitably mitigated.
- 8.94 All other relevant policies and considerations, including equalities, have been taken into account.

## **Appendix 1: 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 21<sup>st</sup> 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 21<sup>st</sup> March.