

PART 6: Planning Applications for Decision

Item 6.2

1.0 SUMMARY OF APPLICATION DETAILS

Ref: 20/01418/FUL
 Location: Land at the junction of Fairchildes Avenue and King Henry’s Drive, Croydon CR0 0AJ
 Ward: New Addington South
 Description: Erection of a six-storey building to provide 17 flats together with car parking, landscaping and other associated works.
 Drawing Nos: 19016-RA-M-00-DR-A-00_50 REV 03, 19016-RA-M-00-DR-A-00_150 REV 04, 19016-RA-M-00-DR-A-00_151 REV 02, 19016-RA-M-00-DR-A-00_152 REV 02, 19016-RA-M-00-DR-A-00_250 REV 03, 19016-RA-M-00-DR-A-00_350 REV 03, 19016-RA-M-00-DR-A-90_101 REV 04, 19016-RA-M-00-DR-A-90_102 REV 02.
 Applicant: Brick by Brick Croydon Limited
 Agent: Carter Jonas
 Case Officer: Scott Schimanski

	1B2P	2B3P	3B5P	Total
Existing				0
Market	0	0	0	0
Affordable Rent	5	1	11	17
Total	5	1	11	17

It is proposed that all of the proposed flats would be affordable rent.

Number of car parking spaces	Number of cycle parking spaces
5	32

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.

2.0 RECOMMENDATION

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

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

- a) Delivery of all units as affordable housing (affordable rent)
- b) £17,475 sustainable transport contribution (towards off-site car club provision, EVCP, car club membership and cycle infrastructure improvements)
- c) Section 278 agreement for highway works (to include, but not be limited to, existing survey, new crossover, new pavement and new route to school entrance)

- d) £11,546 Employment and Training contribution
- e) Local Employment and Training Strategy
- f) Carbon offset payment of £22,500 (to be reviewed if energy strategy is amended)
- g) Air quality contribution of £1,700
- h) Monitoring fees for all obligations
- 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 is 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. Time limit of 3 years
2. Development to be carried out in accordance with the approved drawings and reports except where specified by conditions

Pre-commencement conditions

3. Construction logistics plan
4. Details of connection to foul and/or surface water drainage system to be submitted including SUDS

Pre-ground floor slab conditions

5. Details and samples of materials to be submitted (including roof, window reveals, balustrade/privacy screen details)
6. Final refuse details and cycle stores
7. Details of external lighting
8. Details of public art
9. Details of playspace
10. Electric vehicle charging point details
11. Details of air source heat pump and associated plant
12. Archaeology Watching Brief
13. Confirmation of 'as built' CO2 reduction (with remainder to be off-set through the S106 contribution, in accordance with the energy strategy)

Prior to occupation conditions

14. Landscaping to be submitted (hard and soft landscaping, public realm, new trees, boundary treatment, doorstep playspace, surface treatment)
15. Biodiversity mitigation and enhancement measures
16. Travel plan

Compliance conditions

17. In accordance with tree protection plan
18. Car parking provided as specified
19. Inclusive access with one M4(3) and remainder to M4(2) standard
20. 110 litre Water usage
21. 35% CO2 Carbon Reduction

22. Unexpected contamination
23. Noise levels – internal to flats
24. Any other planning condition(s) considered necessary by the Director of Planning and Strategic Transport

Informatives

- 1) Granted subject to a Section 106 Agreement
- 2) Community Infrastructure Levy
- 3) Construction Logistics Plan
- 4) Light pollution
- 5) Requirement for ultra-low NOx boilers
- 6) Thames Water informatives regarding underground assets and public sewers
- 7) Site notice removal
- 8) Any other informative(s) considered necessary by the Director of Planning and Strategic Transport

2.4 That, if by 17th March 2021 the legal agreement has not been completed, the Director of Planning and Strategic Transport is delegated authority to refuse planning permission.

3.0 PROPOSAL AND LOCATION DETAILS

3.1 The proposal is for the following:

- Construction of a six storey building containing 5 x 1 bed/2 person flats, 1 x 2 bed/4 person (wheelchair accessible) flat and 11 x 3 bed/5 person flats.
- external cycle store, new crossover to King Henry Drive, an on-site parking area accommodating five vehicle spaces and associated landscaping.
- Proposed materials are a simple palette of predominantly red toned brick, with light and dark grey metalwork on the window frames, doors, and balustrades.
- Landscaping materials to be grey tones in the hardscape, new tree and shrub planting, high and low planters.
- A new 3 metre wide shared cycle/footpath along the northern site boundary.



Fig 1: Proposed site plan (ground floor layout)

- 3.2 The scheme proposes a single six storey block, with lift and staircase access to the upper floors. Refuse storage would be provided within the ground floor of the building and a separate cycle store would be located adjacent to the vehicle car park. The proposed block would be set in the northern corner immediately adjacent to the intersection of King Henrys Drive and Fairchildes Avenue. The entry to the building is located on the northern corner of the building and will address the street junction. The scheme would allow for five parking spaces for residents including a disabled space. Access to the parking area would be via a new crossover from King Henrys Drive.
- 3.3 Amenity space would be provided in the form of private balconies for the upper floors and elevated terrace/balconies for the ground floor flats. In addition to this, a communal amenity area that also incorporates child play space is proposed to the western and southern side of the building.



Fig 2: CGI – View of building frontage with parking area

- 3.4 The Council received amended drawings for the following (which did not necessitate re-consultation given their relatively minor nature):
- Landscaping amendments – primarily the removal of tree T158 and replacement within the site

Site and Surroundings

- 3.5 The site is located on the southern side of the junction of Fairchildes Avenue and King Henry's Drive and consists of a grassed roughly triangular parcel of land. It covers an area of 1,375m² and is open amenity land associated within the highway verge. Although the site is open grassland, mature trees and shrubs are positioned immediately adjacent to the southern perimeter, some of which overhang into the site. An existing footpath connecting Fairchildes Avenue to King Henry's Drive runs parallel with the southern boundary to the rear (and outside) of the site. Meridian High School and Green Belt land are located beyond to the south, with a pupil pedestrian access to the school to the western side.

- 3.6 The site is located within New Addington, the centre of which is close by (15-minute walk) which offers numerous amenities and services. The surrounding residential uses are largely two storey red brick semi-detached dwellings, although there are some medium rise flatted blocks along Fairchildes Avenue in the near vicinity. School buildings are located to the south with a Gypsy and Traveller site to the east within the London Borough of Bromley.
- 3.7 The Public Transport Accessibility Level (PTAL) is 2 which demonstrates a poor level of accessibility. There is no rail station within the vicinity of the site, with the nearest tram stop located 1.4km away to the north of Central Parade. The nearest bus stop is located on King Henry's Drive which is 85m from the site and is served by two bus routes – the 64 and 464 which provide services to East and West Croydon, Croydon University Hospital and Addington Village.
- 3.8 In terms of specific development plan policy constraints related to the site, it sits within an Archaeological Priority Area and Flood Zone 1.



Fig 3: Aerial view highlighting the proposed site within the surrounding area

Planning History

- 3.9 In December 2019, officers provided pre-application advice (LBC ref 19/04914/PRE) for the current application on how to proceed. There is no other relevant planning history

4.0 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The principle of intensified residential development is acceptable given the national and local need for housing.
- The proposal would contribute positively to the supply of affordable housing.
- The loss of incidental amenity space is considered acceptable as the submission has demonstrated that the site is not required to service the needs of nearby residents with regards to open space. As such, the site to be built on is considered to be surplus to requirements.
- The scheme would provide high quality architecture and would appropriately respond to site context with suitable relationships to the form, mass and appearance of the existing nearby properties and green belt.
- The living conditions enjoyed by adjacent residential occupiers would not be detrimentally impacted upon 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).
- The level of parking and impact upon highway safety and efficiency would be acceptable subject to mitigation measures.
- The loss of trees is acceptable, subject to replanting and protection of trees to be retained.
- 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.

5.0 CONSULTATION RESPONSE

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

Lead Local Flood Authority (LLFA) (Non Statutory Consultee)

5.2 Following initial objection, additional information was provided and the LLFA commented that the submitted strategy and overall approach meet most of their requirements, and the additional information addressed a number of the queries. However, some clarifications and additional information are still required. Given the nature of the outstanding information, this could be reviewed as part of a planning condition, should the application be consented. The LLFA recommendation is no further objection subject to a suitable planning condition [OFFICER COMMENT: the condition is recommended].

Adjoining Borough – London Borough of Bromley

5.3 No Objection to the proposal.

6.0 LOCAL REPRESENTATION

6.1 The application has been publicised by way of 19 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 site notice. The number of representations received from neighbours in response to notification and publicity of the application are as follows:

No of individual responses: Objecting: 127 Supporting: 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:

Summary of Objection	Officer comment
<i>Principle of Development</i>	
New housing particularly units are not welcomed or needed in this area The proposal is contrary to Council policies SP2.2, DM15 a & e SP7 9.3, 9.22	The provision of new housing is in accordance with adopted policy.

and 11.6 it is also not in line with DM23 a 8.14 b.	
<i>Townscape and Design</i>	
Will be out of character with the area which generally consists of two storey brick houses.	The character of the building has been assessed in its context. Also see paragraphs 8.17-8.20.
<i>Scale of Development Density Issues</i>	
Will result in overcrowding of the site. Will be dominating and overbearing on surrounding properties and out of character with locality. Flats will be too small to live in.	See paragraphs 8.17-8.20, 8.29-8.29 and 8.30-8.35.
<i>Neighbour Impacts</i>	
Development will result in a loss of light to neighbouring properties. Development will create additional noise pollution Loss of privacy from new development. Overlooking of the adjacent school. Concerns with child safety. Impacts upon amenity in terms of noise and disturbance during construction Would result in an increase in anti-social behaviour (gangs and drug use)	See paragraphs 8.36-8.40.
<i>Highways, Traffic and Parking</i>	
Increase traffic on surrounding roads would result in further traffic safety issues. Increase safety concerns for pedestrians (particularly school children) Insufficient on-street parking within the local street network. The development would result in children playing in the street.	See paragraphs 8.50-8.62.

<p>Safety concerns from construction vehicles moving around the site particularly school children</p> <p>Poor public Transport</p> <p>Will make existing parking problems worse.</p>	
<p><i>Trees, landscaping and Biodiversity</i></p>	
<p>Impact upon wildlife including bats, foxes and badgers</p> <p>Loss of open space that is used as a children's play area and an area for community gatherings.</p> <p>Loss of green open space in the area.</p>	<p>See paragraph 8.47 - 8.49</p> <p>See paragraph 8.5 – 8.11</p>
<p><i>Other Issues</i></p>	
<p>Devaluation of property value.</p> <p>Impact upon local infrastructure and services.</p> <p>Provided misleading/incorrect information within the submitted documentation.</p> <p>Drug and alcohol taking by new residents and impact upon school children</p>	<p>This is not a material planning consideration.</p> <p>The application is CIL liable.</p> <p>The application has been assessed against the information received and against planning policy. Residents are able to comment on the application and make their views known.</p> <p>This is not a material planning consideration.</p>

6.3 One representation in support stated the following:

- Much needed housing, good use of under-utilised space

6.4 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.

7.0 RELEVANT PLANNING POLICIES AND GUIDANCE

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

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

Consolidated London Plan 2016

- 3.3 Increasing housing supply
- 3.4 Optimising housing potential
- 3.5 Quality and design of housing developments
- 3.8 Housing choice
- 3.9 Mixed and balanced communities
- 5.1 Climate change mitigation
- 5.2 Minimising carbon dioxide emissions
- 5.3 Sustainable design and construction
- 5.12 Flood risk management
- 5.13 Sustainable drainage
- 5.16 Waste net self sufficiency
- 6.3 Assessing effects of development on transport capacity
- 6.9 Cycling
- 6.13 Parking
- 7.2 An inclusive environment
- 7.3 Designing out crime
- 7.4 Local character
- 7.6 Architecture
- 7.8 Heritage Assets and Archaeology
- 7.14 Improving air quality
- 7.16 Green Belt
- 7.19 Biodiversity and access to nature

- 7.21 Woodlands and trees

Croydon Local Plan 2018

- SP2 Homes
- DM1 Housing choice for sustainable communities
- SP4 Urban Design and Local Character
- DM10 Design and character
- DM13 Refuse and recycling
- DM15 Tall Buildings
- DM16 Promoting healthy communities
- DM17 Views and Landmarks
- SP6 Environment and Climate Change
- DM23 Development and construction
- DM24 Land contamination
- DM25 Sustainable drainage systems and reducing flood risk
- SP7 Green Grid
- DM26 Metropolitan Green belt
- DM27 Biodiversity
- DM28 Trees
- SP8 Transport and communications
- 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):
- D1 London's form, character and capacity for growth
 - D2 Infrastructure requirements for sustainable densities
 - D3 Optimising site capacity (subject to SoS modification)

- D4 Delivering good design
- D5 Inclusive design
- D6 Housing quality and standards
- D7 Accessible housing
- D8 Public Realm
- 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)
- S1 Developing London's social infrastructure
- S4 Play and informal recreation
- E11 Skills and opportunities for all
- HC1 Heritage conservation and growth
- G1 Green infrastructure
- G4 Open space
- G5 Urban greening
- G6 Biodiversity and access to nature
- G7 Trees and woodlands
- SI1 Improving air quality
- SI2 Minimising greenhouse gas emissions
- SI3 Energy infrastructure
- SI5 Water 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 (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

8.0 MATERIAL PLANNING CONSIDERATIONS

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

1. Principle of development
2. Housing mix
3. Townscape, design and visual impact

4. Housing quality for future occupiers
5. Residential amenity for neighbours
6. Parking and highway safety
7. Trees, landscaping and biodiversity
8. Flood risk
9. Sustainability
10. Other planning matters

Principle of Development

- 8.2 This proposed development needs to be assessed against a backdrop of significant housing need, not only across Croydon but 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 LB 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 was an additional 44,149 new homes by 2036, but at the time, there was currently limited developable land available for residential development in the built up area and was considered 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.
- 8.3 The emerging New London Plan, which is moving towards adoption (although is the process of being further amended) proposed increased targets which need to be planned for across the Borough. 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.
- 8.4 This presumption includes places such as New Addington which is identified in the "Places of Croydon" as an area where sustainable development can occur and includes windfall and infill sites. The Croydon Suburban Design Guide (2019) was adopted last year, which set out how suburban intensification can realise high quality outcomes; thinking creatively about how housing can be provided on windfall sites. As is demonstrated above, the challenging targets will not be met without important windfall sites coming forward, in addition to the large developments within Central Croydon and on allocated sites.
- 8.5 Notwithstanding the above, the site has not been previously developed and is part of a large green strip (verge) that extends along the southern side of Fairchildes Avenue from Corbett Close to the junction with King Henrys Drive. This area of open amenity land has some clear associations with the development of the immediate suburban settlement adjacent to the Green Belt. As highlighted in the public submissions, this land is valued both visually and functionally by local residents. Whilst it was clear that some residents make use of the application site for amenity purposes (exercise, play and dog walking), it is noted that the majority of properties are houses that have access to relatively sizeable rear gardens. Further, it is acknowledged that the space provides an open and pleasant outlook for neighbouring residents, however the space to be built on has limited biodiversity value as a maintained grassland. The row of trees to the rear that forms a barrier between the urban environment and the school (with green

belt beyond) will remain. Subject to the quality of the new development, officers are of the opinion there is an opportunity to make more effective use of this space and in so doing, help address the need for more affordable homes

- 8.6 As the land currently comprises open grassed area that provides incidental green space and a visual break within the street-scene justification for its loss would need to be carried out in accordance with the provisions of paragraph 97 of the National Planning Policy Framework (NPPF).



Fig 4: Photograph looking south with the row of trees in the background

- 8.7 Paragraph 97 of the NPPF advises that existing open spaces should not be built on unless an assessment has been undertaken which clearly indicates that the open space is surplus to requirement or where the loss resulting from the proposed development would be replaced by equivalent or better provision elsewhere. It is noteworthy that the site is not designated or recognised as an open space by the Croydon Plan, although it is appreciated that the need to retain the space still needs to be assessed in accordance with the NPPF. The applicant has sought to justify the loss of this space, both from a visual and functional perspective.
- 8.8 The Council's Open Space Needs Assessment determines that New Addington is well served for different types of open space, including natural / semi-natural open space, parks, gardens and amenity space. The Statement of Community Involvement submitted with this application states that *"respondents were asked how they use the existing open space on site. 24% of residents used the site for play space, 23% for visual amenity, 18% for dog walking, 18% for sports, 15% for picnicking and 2% didn't use the site"*. There are a range of publically accessible and key green spaces within a 500m catchment area of the site. This includes Milne Park for formal and informal recreation and a playground, as well as more natural green spaces such as Hutchinson's Bank and Gushyshaw Bank within 10 minutes-walk for informal play and dog-walking.



1 Milne Park



2 Milne Park Playground



3 Gushybank Shaw



4 Hutchingson's Bank

Fig 5: Images of nearby open amenity and recreation space

- 8.9 In view of the overall level of open space provision within the immediate area, officers are satisfied (on balance) that the loss of this small area of incidental open space (both from an functional and visual perspective) would be acceptable and in accordance with the NPPF can be considered surplus to requirements, especially when viewed against the need to deliver more homes and specifically affordable rented homes.
- 8.10 The scheme is approximately 120m from the Metropolitan Green Belt boundary, with significant trees and the school buildings in between. Consequently the scheme would not compromise the openness of the Green Belt.
- 8.11 The site is located within an existing residential area and for the reasons outlined above, providing that the proposal accords will all other relevant material planning considerations, the principle of development can be supported.

Housing Mix

- 8.12 CLP 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 suburban settings with low PTALs, the requirement is 70% 3+ bedroom units. That said, Policy DM1.1 also advises that within the first three years of the CLP, the requirement for 3 bedroom homes can be substituted by 2 bed 4 person homes.
- 8.13 The scheme as proposed, would provide 65% 3 bedroom units, however when including the 1 x 2 bedroom/4 person unit (as allowed by current policy), the

development would provide the required 70% provision of family sized units. The housing mix is considered appropriate.

Affordable Housing

- 8.14 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.
- 8.15 The scheme proposes to deliver all 17 flats as affordable rented accommodation for which there is significant lack of across the borough. The delivery of 100% affordable housing represents a benefit of the scheme which should also be considered and balanced against other aspects. A viability report was submitted that tested an alternative 'policy compliant' scenario (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. Whilst the 100% affordable rent provision is a divergence from policy (60:40 split), it is a mix that optimises a much needed form of affordable housing within Croydon. In addition, the delivery of a range of 1, 2 and 3 bedroom flats will meet an identified need for residents living in New Addington South that are currently on the Council's waiting list.
- 8.16 These affordable homes as part of a subsequent planning permission will be secured via an associated S.106 Agreement. The scheme would positively contribute to the delivery of new homes (including affordable homes).

Townscape, Design and Visual Impact

Scale and Massing

- 8.17 CLP Policy DM10.1 states that proposals should achieve a minimum height of 3 storeys whilst respecting a) the development pattern, layout and siting; b) the scale, height, massing and density; c) the appearance, existing materials and built and natural features of the surrounding area. Approaches to scale and mass are further outlined in the Suburban Design Guide (SDG). In the context of the site and surrounding building heights, under CLP Policy DM15, the development is also considered a tall building. DM10 and the remainder of DM15 require schemes to be exceptional quality, demonstrate a sensitive approach, relate positively to nearby heritage assets, be well integrated with the local area and provide active ground floor and inclusive public realm.
- 8.18 It is important to note that policy DM15 states that tall buildings will be permitted in areas identified for such buildings (which the site is not) and in areas with a minimum PTAL 4 (the site has a PTAL of 2). Members must consider the scheme in the context of this policy transgression. However, it does not follow that a six storey building is completely unacceptable in principle; material considerations may tip the balance in favour of approval, as officers consider the case here, on its own merits.
- 8.19 Officers acknowledge that the housing stock in the immediate area is generally two stories in height. There are a number of taller buildings, particularly on junctions between roads in this section of New Addington, notably a four storey flat roof block to the other end of Fairchildes with Corbett Close as well as the junction between Homestead Way and Thorpe Close and a 4 storey pitched roof block at the junction

between King Henry's Drive and Arnhem Drive. As outlined within the SDG, buildings on corner plots should seek to accommodate additional height as marker points within the townscape. Therefore the principle of a taller building is encouraged. Although higher than its neighbours, the 'island' nature of the site and subsequent separation distance of more than 18 metres means that it would not dominate or be overbearing to its neighbours. It is also important to note that there are no sensitive heritage assets in the vicinity of the site. The proposed building has a modest footprint and a successful proportion as a result. The ground floor provides a legible and active entrance as well as improvements to the public realm. Officers consider the building to be well designed including the use of high quality, durable materials that will ensure it maintains its appearance into the future. The building will stand alone from its nearest neighbours on a corner plot and includes generous areas of open amenity space on each flank.



Figure 74: View 01 - Approach from west of Fairchildes Avenue



Figure 76: View 02 - Approach from east of Fairchildes Avenue

Fig 6: massing model of proposal

8.20 The overall quality of the building, limited colour palette and its simple architectural design means that it is expected to sit comfortably within its context and contribute positively to the character and appearance of the locality. In terms of height and overall scale, officers are of the view that the proposed building satisfies the primary objectives of CLP Policies DM10 and DM15.

Site Layout

8.21 Although an open grassed area, the layout of the site has largely been determined by physical and infrastructure restrictions around the perimeter. The siting of the building has also been influenced by how it will relate to the surrounding build environment in terms of scale and appearance. In particular, utility services are located along the eastern and southern boundaries and a significant number of noteworthy mature trees are located in the vicinity of the southern boundary, all of which must be preserved. Further, the site is located adjacent to the entry to a school with the western portion being an informal pedestrian access for students.

8.22 The position of the building in the northern corner allows for the retention of important vegetation along the southern boundary, provides a suitable area for vehicle parking, cycle storage and also provides opportunity to enhance the pedestrian link through the site to the school and extend the pavement along the Fairchildes Avenue frontage. The entrance to the building on the corner is legible and refuse stores have been integrated within the building. The parking is integrated within the landscaping with scope for additional planting.

8.23 Overall, it is considered that the layout of the site is appropriate and has been set out in a way to minimise the impact on neighbouring properties and the environment. The suitability of specific elements of the design such as amenity spaces, parking and refuse are all discussed separately below.



Fig 7: Site layout Drawing

Architectural Expression

8.24 To respect and complement the surround built environment, a simple design and material pallet in a modern re-interpretation style has been selected. The building facades would have a simple composition, which is reflective of the other standalone flatted buildings in the wider area.



Figure 64: Typical material treatment and fenestration to mid-rise blocks near to Fairchildes Avenue

North Elevation

Fig 8: Nearby flat buildings and proposed north elevation of building

8.25 In terms of materials, a red brick cladding has been chosen as the primary facing material as it will tie the building in with its surroundings whilst also being robust and long lasting. To add interest to the building, various bonding techniques will be used for different proportional elements, which also helps to break up the mass. Further to this, and to present a building of quality, the façade also includes brickwork detailing around the windows with deep reveals and subtle brick lintels and cills. To complement the detail of the brickwork around opening, frames to windows and external unit doors will be of simple power-coated metal in a pale grey. A darker power-coated metal will be used for balustrades and entry doors.

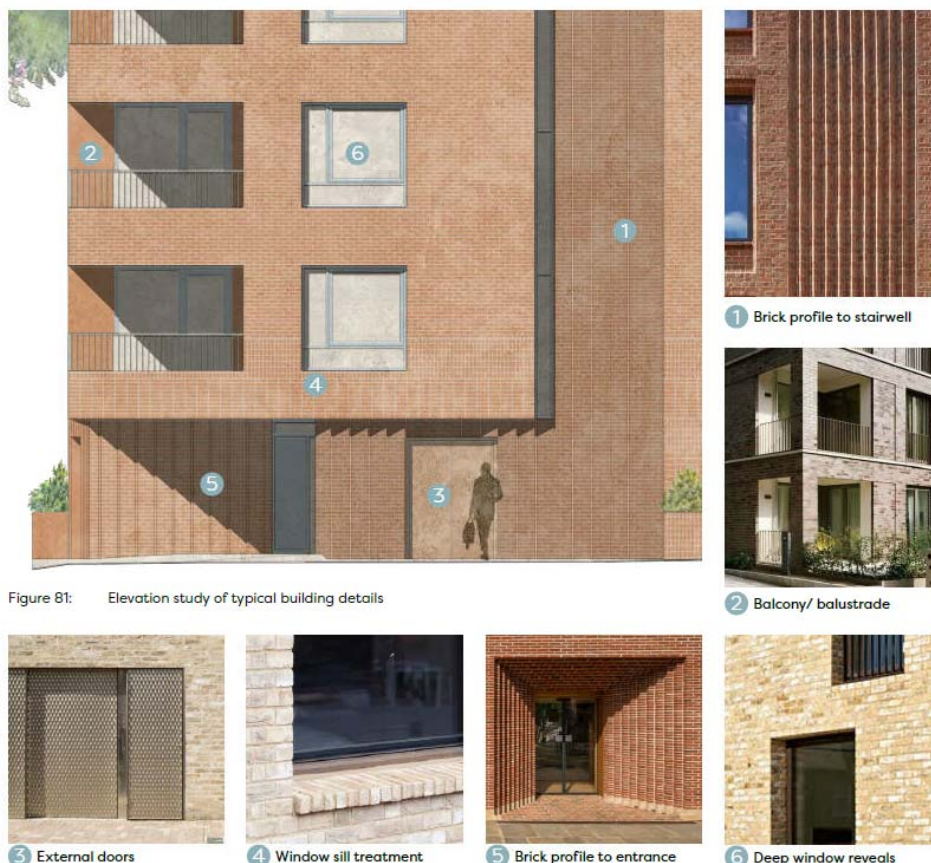


Figure 81: Elevation study of typical building details

Fig 9: Details of external materials and finishes

8.26 In terms of street elevation, the uniform placement of windows and balconies have been designed to reflect the pattern in other nearby buildings. In addition to the use of various bonding techniques for brick work to create interest and break up the façade, the design also includes a sculptured articulation of the brickwork around the corner entrance. This element wraps around from both frontages and will also help to make the buildings entry more legible when approaching from either direction.

8.27 Overall, officers consider the design of these proposals to be well considered and appropriately deals with the challenges of the site in a sensitive and innovative manner, suitably optimising the development potential in line with CLP policy and the Suburban Design Guide SPD. Specifics of the details of materials, bonding and window reveal depth can be controlled by planning condition.

Density of Development

8.28 The site has a suburban setting with a PTAL rating of 2 and as such, the London Plan indicates that the density levels ranges of 150-250 habitable rooms per hectare (hr/ha). It also advises that where there is an average of 3.1-3.7 habitable rooms per unit, a

scheme should normally expect to achieve 40-80 units per hectare. Treating the combined living/kitchen/dining areas as a single habitable room, the proposed density of development would equate to around 228 habitable rooms per hectare and 76 units per hectare for the red line application site.

8.29 Although the density is at the upper limit of the range, 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. The acceptability of the development in terms of scale, mass, layout and appearance was discussed earlier in this report which represents an important dimension when determining the acceptability of a particular density. This project has emerged out of a design-led response and its various relationship challenge and is considered appropriate.

Housing Quality for Future Occupiers

8.30 All of the proposed new units would comply with or exceed the internal dimensions required by the Nationally Described Space Standards (NDSS) and would be dual aspect.

8.31 As regards external amenity space, the London Housing SPG states that a minimum of 5 square metres of private outdoor space should be provided for 1-2 person dwellings and an extra 1 square metres for each additional occupant. Private amenity space has been provided for the upper floor flats of no less than 5sqm, which is in accordance with the requirements. An area of communal amenity area, including playspace is also proposed and will complement the private amenity areas.

8.32 In terms of play space, the London plan requires no less than 216m² of play space for the unit mix. The proposed play areas exceed this requirement with the overall landscaping incorporating interactive play equipment throughout the entire site. The space will be made up of gently undulating grass mounds to promote their use for play. They will be well-drained and designed so that they are safe to use for all ages.

8.33 The application was accompanied by a daylight and sunlight assessment which identified that whilst most rooms complied with average daylight factor (ADF) requirements, two living rooms (combined kitchen/living/dining) fall marginally below (1.7% and 1.8%) the 2% target for kitchens. However, the rooms do meet the 1.5% requirement for living rooms. Officers are of the view that as this deviation is relatively minor and given the function and size of the room, it is unlikely to have a detrimental impact upon the amenity of future residents. In terms of NSL, all rooms within the development meet with BRE guideline targets. In terms of sunlight, all applicable rooms will meet the APSH targets. Officers agree with the conclusion of the assessment that all units will achieve adequate levels of both daylight and sunlight to ensure a high level of amenity for future residents.

8.34 Any noise issues associated with noise from outside the site would be able to be mitigated through standard noise insulation measures and planning conditions have been recommended to ensure that external noise effects are minimised.

8.35 Level access would be provided to the building and internally a lift would provide level access to all flats to ensure the development would comply with part M4(2) of the

Building Regulations. One accessible flat is proposed on the ground floor and will comply with the requirements of part M4(3) of the Building Regulations. Level access is also provided to all communal areas of the development. These aspects will be secured by condition to trigger the Building Regulations requirement.

Residential Amenity for Neighbours

Neighbour Impacts

- 8.36 The site does not immediately abut and is well separated from residential properties and as such, its impact upon the amenity of nearby residential properties in terms of overlooking, outlook and loss of daylight/sunlight is minimal.
- 8.37 There is a distance of more than 18 metres between the proposed and existing properties opposite which is in compliance with the requirements of the Suburban Design Guide (2019) to avoid overlooking and is acceptable. Given that the proposed block sits on a parcel of land separate from other residential properties, it will not impede on the 45 degree line taken from the centre of the nearest ground floor windows. As the development is across a road from the nearest neighbours, outlook from these properties is also considered acceptable.

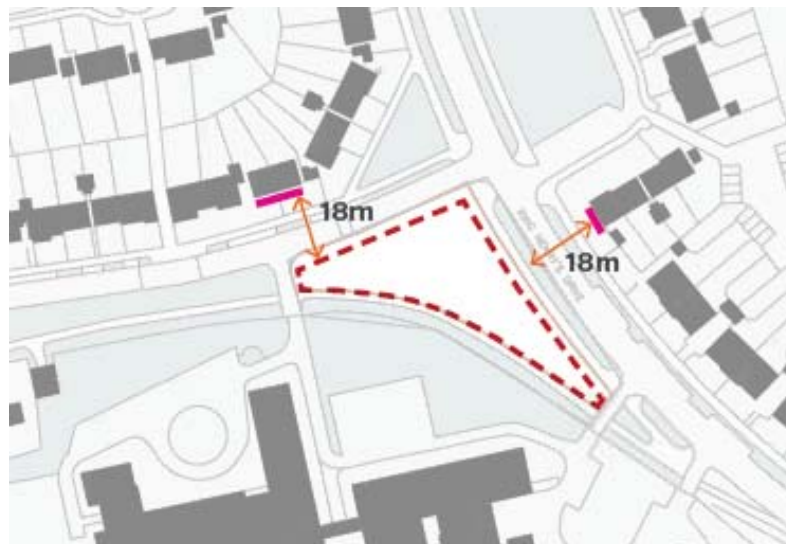


Fig 10: Separation distances between site and nearest neighbouring properties

Daylight and Sunlight Effects

- 8.38 A Daylight and Sunlight report was prepared and assessed the impact of the dwelling on four nearby properties (2, 4 and 6 Fairchildes Avenue and 493 King Henrys Drive). In terms of vertical sky component (VSC), two window panes of a bay window of the nearest property (4 Fairchildes Avenue) will experience loss of daylight in excess of suggested BRE guideline targets. The most notable loss is to a side windowpane which is located immediately adjacent to a porch structure and currently has very limited daylight/sunlight exposure with poor outlook and light (an existing VSC of 5.9 reducing to 1.4).
- 8.39 BRE guidelines suggest that the main front facing window of a bay window can be taken as the primary window when assessing VSC impacts. In this instance, the primary window of this bay window would also experience a reduction in VSC. However, at 26.6% VSC with a 20.8% reduction, there is only a very minor technical deviation from the suggested 27% and 20% targets set out in the BRE guidelines. Notwithstanding this minor departure from recommended guidelines, all rooms within

these properties would remain compliant with respect to NSL and APSH targets. Further, no private amenity space (back gardens) of nearby properties would be overshadowed as a result of the development and the open space to the north (in front of 2 and 4 Fairchildes Avenue) would also meet BRE guidance in terms of sunlight. Overall, officers concur with the findings of the daylight/sunlight report that the development would not result in an unreasonable impact upon neighbouring properties and that these properties would continue to enjoy good levels of daylight and sunlight.

8.40 Having considered all of the above against the backdrop of housing need, officers are satisfied that the scheme proposes an acceptable impact on the occupiers of neighbouring properties.

Trees, Landscaping and Biodiversity

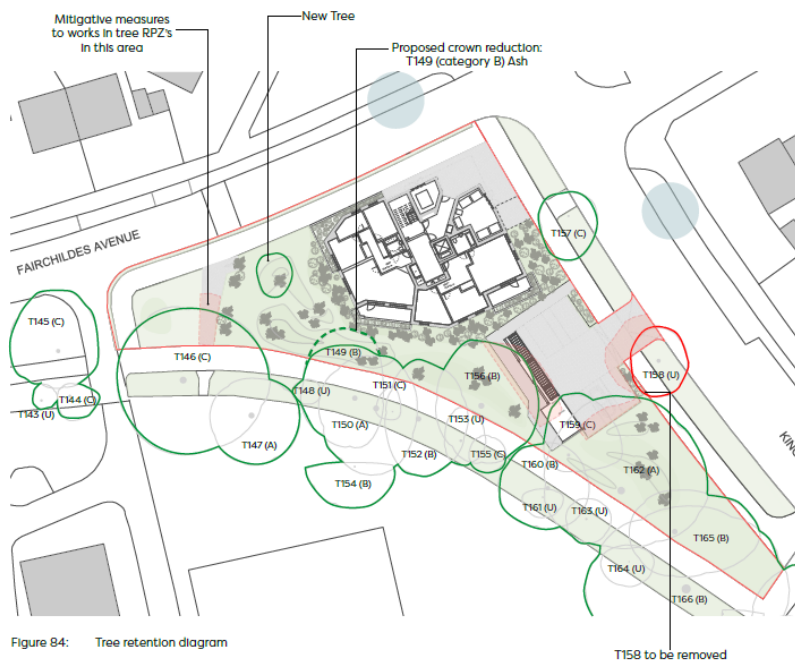


Fig 11: Tree retention and loss

Trees

8.41 The submitted Arboriculture Assessment assessed the impact on 27 trees (4 on site and 23 primarily to the south), three of which are Category A, eight Category B, nine Category C and seven Category U. One Category C tree (Wild Cherry) and all of the Category U trees (Hawthorn, Plum or Ash) are proposed to be removed as a result of the development with the crown of one Category B tree (Ash) to be reduced. Protocols suggest that Category C trees have limited life expectancy and that Category U trees should be removed as they are deemed unsuitable due to poor form and condition. In addition to the removal of the abovementioned trees, the root protection area around five trees may also be impacted upon by the construction of the new footpath and car parking area.

8.42 The trees to be removed are either smaller trees located under the canopies of larger trees or, in the case of the C grade tree, in a position that would compromise the vehicular access. It should be noted that this tree does have advanced basal decay. In terms of root protection, if mitigation measures were not implemented then three trees could be adversely impacted upon. To protect these trees, a no-dig surface design has been specified and tree and root protection methods would be used during construction to ensure trees are suitably protected. A condition is recommended

requiring tree protection to be done in accordance with those recommended in the Arboricultural assessment.

- 8.43 The landscaping includes the replacement of the Category C. Overall, the landscaping plan proposes to incorporate lower level planting including native and wildlife friendly shrub and understorey species to compliment the extensive and dominant expanse of trees located adjacent to the southern boundary. The provision of small planting is appropriate as it would enhance the biodiversity in the area and the sites ability to support a diverse range of wildlife.
- 8.44 A landscape plan has been submitted that outlines the general principles of planting, paving and play spaces. The plan illustrate an open landscaped area that incorporates sustainable drainage measures and appropriate child play space facilities. The landscaping has been designed to blend in with, and contribute to the biodiversity of the group of trees along the southern boundary.
- 8.45 Given the open character of the site and the presence of footpaths/cycle ways located around all sides of the building, it is paramount that the landscaping protects the privacy and amenity of future occupants whilst maintain an open feel to the site. To do this raised planter beds have been provided around the perimeter of the building to ensure a suitable/defensible separation between the communal open areas and windows/private amenity areas of the proposed units.
- 8.46 New hard landscaping is predominantly limited to the northern corner adjacent to the main entry, a pathway that will link the cycle store and parking area to the front of the building, a new pathway to the Fairchildes Avenue frontage and also a new pedestrian path at the western fringe that will provide access to the adjacent school. Areas of paving have been designed to promote a pedestrian priority surface that blends into the surrounding soft landscaping.

Ecology/biodiversity

- 8.47 In terms of ecology, the grassland nature of the site generally limits on-site habitats to the strip of scattered trees and dense scrub along the boundary with the submitted ecology report suggesting the site has a modest (negligible) ecological value. Notwithstanding this, the site has potential to support protected species, although no invasive species were identified on the site.
- 8.48 The proposed tree removal and new building is not expected to have an impact upon habitats for protected species. However the following mitigation measures are recommended to safeguard protected species:
- Bat boxes on remaining trees or on the new building
 - Minimisation of lighting spillage
 - Removal of C grade tree outside nesting season
 - Provision of bird boxes
 - Planting of wildlife friendly species
- 8.49 The area of the site where the key ecological features are found (along the southern boundary) is the area of the site that is least impacted. Subject to the planting identified above, details of landscaping to be controlled by condition, and the provision of ecological mitigation and enhancement measures as outlined within the ecology report, the proposed development is considered to be acceptable in ecological terms.

Parking and Highway Safety

8.50 The application is supported by a Transport Statement, dealing with the various transport impacts and associated mitigation measures. The site is located in an area with a poor PTAL of 2 at the junction with Fairchildes Avenue close to two schools. Two bus routes (64 and 464) service the area with bus stops located approximately 85 metres from the site. Average frequency in peak hour are between 3 and 10 minutes and services provide access to Croydon town centre and New Addington Tram Stop (Tatsfield Village).

Car Parking

8.51 Numerous residents have raised concern with the impacts that the scheme will have upon traffic in the surrounding road network and also on available on-street parking.

8.52 Census data (Ward Level) suggests that 40% of residents of flats in New Addington own a car. The applicant's transport consultant has predicted (based on this Census analysis) that the proposed development would be expected to generate demand for 9 car parking spaces (0.5 spaces per unit).

8.53 The adopted London Plan sets out maximum car parking standards for residential developments based on public transport accessibility levels and local character. For a site with a PTAL of 2, there should be up to 1.5 space per unit. As these are maximum parking standards, a lower provision can be accepted if overspill does not place unacceptable pressure on on-street parking within the surrounding road network. In addition, adequate parking spaces for disabled people must be provided on-site.

8.54 The proposal includes five on-site parking spaces within a designated parking area accessed from King Henry's Drive. These spaces include a disabled parking space. To assess the impact of the development on on-street parking, the applicant's transport consultant carried out a car parking beat survey (utilising the Lambeth Methodology) to determine the level of on street car parking capacity and whether the likely car parking demand could be suitably accommodated in neighbouring streets (within 200 metres of the application site). Both night time and daytime surveys were carried out.

8.55 The survey considered the impact of an overspill of 4 spaces resulting from expected vehicle numbers. However, given the age of Census data (2011) and the number of larger family size units within the scheme, officers queried the accuracy of expected car ownership and as such also requested that the survey considered a scenario of a 1:1 car ownership (each unit having a vehicle), thereby considering a potential overspill of 12 vehicles.

8.56 The beat survey suggests that on average a total of 102 spaces are available in the surrounding street during the night, equating to 46% parking stress. In the event of the 1:1 vehicle ownership scenario, the overspill of 12 spaces results in a parking stress of 53% which indicates that there is sufficient capacity (90 spaces available). Based on this higher car ownership scenario, officers are satisfied that the proposed development would not result in an unacceptable impact upon on-street parking within the surrounding road network.

8.57 Notwithstanding the surrounding streets ability to accommodate additional on-street parking, officers are of the view that as the development is within a low PTAL area and includes a large number of three bedroom units it would likely generate journeys that

are not necessarily convenient to be undertaken by walking, cycling or by bus. As such, and in order to promote more sustainable transport methods, a contribution towards a car club space in the vicinity of the site together with car club membership and EVCP are considered appropriate, as well as a contribution towards improving cycle infrastructure in New Addington.

- 8.58 It is important that certain highway works are implemented as part of this planning permission to manage car parking in and around neighbouring streets to ensure that on-street car parking associated with this development can operate safely (with proper consideration for highway safety). This would be secured through a condition requiring s38 and s278 highways agreement to be entered into and works delivered in advance of occupation of the units and would include (but not limited to) delivery of suitable pedestrian footpaths and potentially the relocation of a traffic island to maintain road safety, as well as making good any damage and adoptable standards.
- 8.59 Overall, officers are satisfied that with the mitigation measures identified (including contributions), the car parking implications of the development are acceptable.

Cycle Storage

- 8.60 Cycle parking is shown to be located within a secure storage area located adjacent to the parking area. This area includes sufficient space for 32 cycles including Sheffield stand for adapted bikes. A visitor cycle parking space is proposed to the front of the building. This level of provision is acceptable and the details provided as part of this submission are adequate to determine the suitability of cycle storage on site.

Refuse Storage

- 8.61 The proposed refuse storage area would be included within the ground floor of the building and is of a sufficient size. The refuse storage area is located directly off the main lobby of the building which is convenient for future residents. Additionally, access is also provided directly from the front of the building within easy access of the highway and collection point. Further, a bulky goods area is also located adjacent to the King Henry's Drive frontage and is considered sufficient. Specific details of refuses can be conditioned within a waste strategy and it is considered that this approach is acceptable.

Other Highway Impacts

- 8.62 A draft Construction Logistics Plan has been submitted and final details can be secured by a planning condition.

Flood Risk

- 8.63 The site has a low risk of fluvial flooding (Flood Zone 1), surface water and reservoir flooding. The application proposes that runoff from site will be attenuated through the use of SuDS elements including, green roofs for the external cycle store, filter strips/drains, small swales and attenuation tanks. The attenuation tank will be connected to the Thames Water network via a 2l/s flow control and the total storage capacity of the element of the drainage system is 50m³. The proposed runoff strategy has been reviewed by LLFA and are satisfied that the strategy is appropriate. The implementation of the strategy can be controlled by planning condition.

Sustainability

- 8.64 The submitted Energy statement states that the adoption of photovoltaics (64sqm) on the roof, air source heat pumps for hot water and heating together with the use of high efficiency lamps, insulation, and improved building techniques would ensure the scheme creates a total carbon dioxide savings of 47%. 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 good carbon dioxide savings and is on balance acceptable.
- 8.65 Subject to a condition requiring the minimum on-site reduction to be 35% CO2 emissions (with the balance to zero secured through the s106) together with a condition to ensure that the development achieves 110 litres water per head per day, the scheme is acceptable in this regard.

Contamination

- 8.66 A Phase 1 Desk Survey has been submitted in relation to contaminated land matters and as the site has been undeveloped since 1955, it has little potentially contaminative history. Further, the chemical analyses undertaken as part of the ground investigation do not indicate any contamination. The submitted report concludes that no further remedial measures would be required. Notwithstanding this, to ensure future residents are protected from any potential or unknown contamination is recommended that a planning condition is imposed to ensure appropriate mitigation measures are implemented.

Archaeology

- 8.67 The site is located in the vicinity of the London to Lewes Roman Road and is therefore within an area of high archaeological potential. An Archaeological Assessment was undertaken and report submitted. The report concluded that the site may hold evidence of past human activity worthy of an expert investigation, however any remains uncovered are unlikely to be of national significance. Notwithstanding this and to ensure the preservation of any potential archaeology on site it is considered prudent to require an archaeological watching brief be put in place.

Healthy Streets/communities

- 8.68 The scheme would ensure the creation of a healthy community with access to open space, promote cycling and walking and safeguarding a portion of the site for social interaction and community engagement.

Fire Safety

- 8.69 A fire Statement was submitted as part of the application package. The statement outlines access and facilities for the fire service and more generally how the proposed design can achieve compliance with Schedule 1 Part B of the Building Regulations. This is acceptable.

Community Infrastructure

- 8.70 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

Conclusion

- 8.71 Whilst it is accepted that the scheme would result in the loss of incidental open space/amenity land which contributes to the character of the immediate area, the value

of the site (on balance) is outweighed by the provision of new homes and specifically affordable homes.

8.72 Whilst acknowledging the transgression with policy DM15, the design of the proposals has been well considered in terms of layout, scale, mass, external appearance and landscaping. The accommodation would comply with internal space standards, with all units being dual aspect and would provide a high standard of accommodation overall. The impact of the development on immediate neighbours would be minimal, there is capacity on street to accommodate overspill car parking demand and mitigation would help provide alternative sustainable transport options.

8.73 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 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.