

**1. DETAILS OF THE DEVELOPMENT**

Ref: 21/02453/PRE  
Location: 121 Canterbury Road, Croydon, CR0 3HH  
Ward: Broad Green  
Description: Demolition of buildings and erection of a building with heights ranging between four and eight storeys to provide 93 residential units. Associated parking and landscaping, along with a public footway/cycle route through the site  
Applicant: Mr Nick Lawrence, Canterbury Road (121) LLP  
Agent: Icen Projects  
Case Officer: Mr White

**2. PROCEDURAL NOTE**

- 2.1 This proposed development is being reported to Planning Committee to enable Members to view it at pre-application stage and to comment upon it. The development does not constitute an application for planning permission and any comments made upon it are provisional, and subject to full consideration of any subsequent applications, including any comments received as a result of consultation, publicity and notification.
- 2.2 It should be noted that this report represents a snapshot in time, with negotiations and dialogue on-going. The plans and information provided to date are indicative only and as such the depth of analysis provided corresponds with the scope of information that has been made available to Council officers. Other issues may arise as more detail is provided and the depth of analysis expanded upon.
- 2.3 The report covers the following points:
- a. Executive summary
  - b. Site briefing
  - c. Place Review Panel feedback
  - d. Matters for consideration and officers' preliminary conclusions
  - e. Specific feedback requests
  - f. Procedural matters

**3. EXECUTIVE SUMMARY**

- 3.1 The scheme has so far been developed through a number of pre-application meetings with officers. It was considered by the Place Review Panel (PRP) in April 2021 and their views are covered in section 5.
- 3.2 Discussions so far have focused on the principle of the development, the distribution of scale/bulk/height across the site, the design approach and its visual relationship with surrounding buildings, impacts on neighbouring

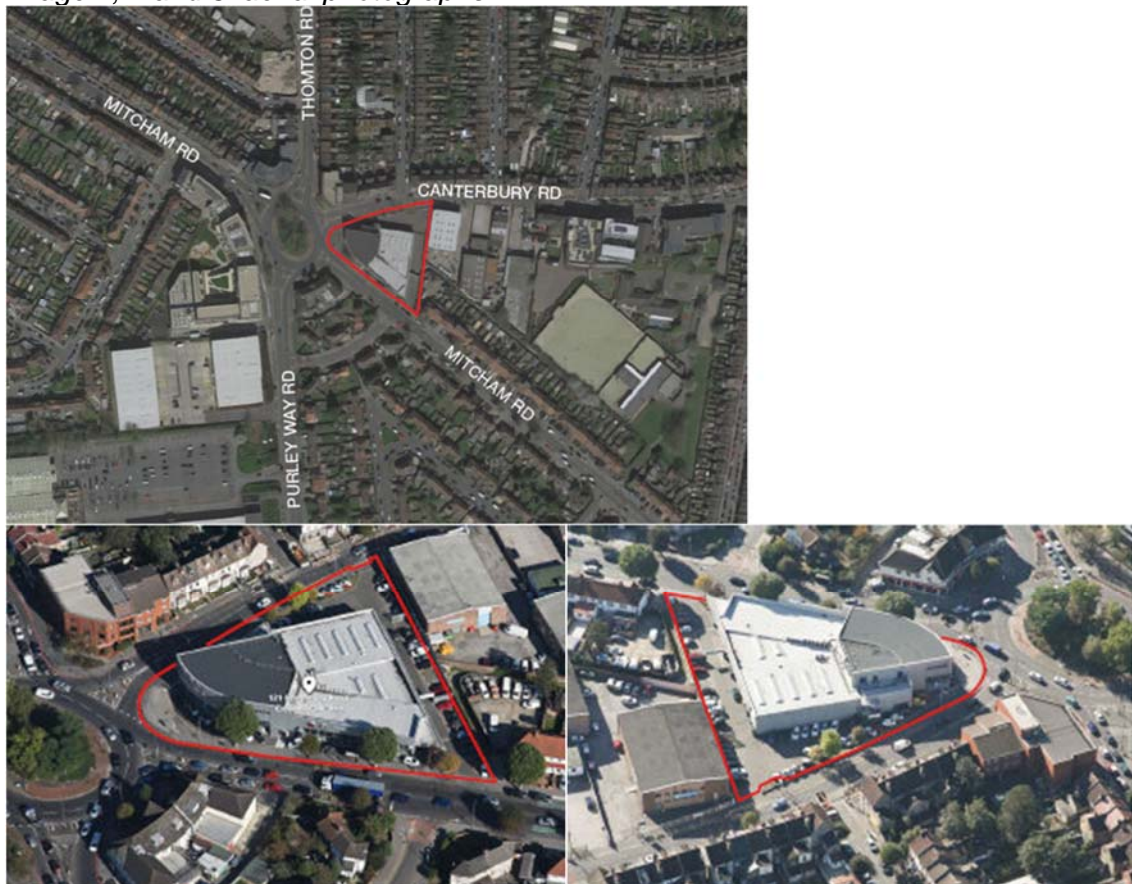
developments (in terms of light/outlook/privacy etc) and transportation matters, including the provision of a new public pedestrian / cycle link through the site.

3.3 It is anticipated that a single full planning application will be submitted to cover the whole site.

#### 4. SITE BRIEFING

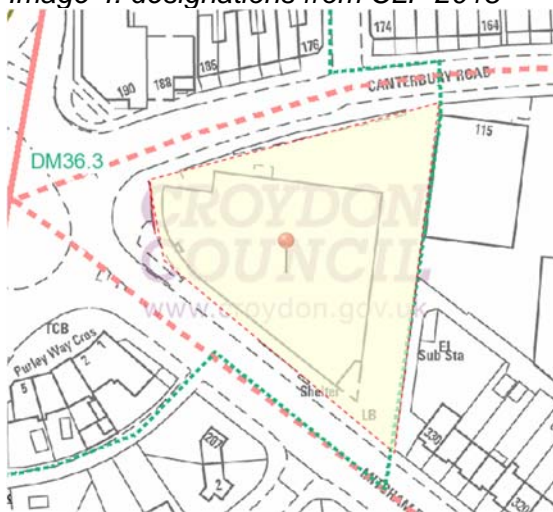
- The site has an area of 0.37 ha and was previously occupied by Motor Village, a dealerships offering Fiat, Alfa Romeo, Abarth and Jeep vehicles. It is understood The Motor Village is now permanently closed.
- The subject site comprises a large single/two-storey building (albeit with high floor to ceiling heights) on the corner of Mitcham Road and Canterbury Road.
- Prior to its closure on the ground floor there was a large showroom on the Mitcham Road frontage, with offices, workshop, parts department, MOT and valeting bay having access via a rear yard onto Canterbury Road.
- The first floor part of the building is located on the western side and was previously occupied by offices, store and plant rooms.
- The rear part of the site is used for car parking.
- The building is finished with a mixture of glazing and metal cladding.
- There are two vehicle entrances serving the site – in the north east and south east corners.

*Image 1, 2 and 3: aerial photographs*



## Designations

- Place specific Policy DM36 – Broad Green and Selhurst  
*Image 4: designations from CLP 2018*



- Surface water flood risk (Low/Medium)  
*Image 5: Surface water Flood Map (Gov.uk)*



- Mitcham Road (eastern side of the roundabout) and Canterbury Road are classified roads

## Surrounding Areas

- The surrounding area contains a mixture of generally two-storey residential terraced properties and larger mixed use buildings centred around the roundabout.
- There are some commercial uses located to the rear of the subject site, along Canterbury Road.
- The roundabout and parts of the surrounding roads form part of the TLRN with TfL as the Highway Authority for these roads.
- Canterbury Road is subject to a Controlled Parking Zone.
- There is a bus stop (route 264) on the south west side of the site.
- There are a number of street trees on both Mitcham Road and Canterbury Road.

## **Relevant Planning History**

- 4.1 96/01993/P Demolition of existing buildings, erection of building comprising basement, mezzanine and roof parking accommodation to provide a car

showroom, vehicle repair workshop and associated spare parts sales with external sales area; formation of vehicular accesses to Mitcham and Canterbury Road; provision of 36 external car parking spaces. Permission Granted 06.03.1997.

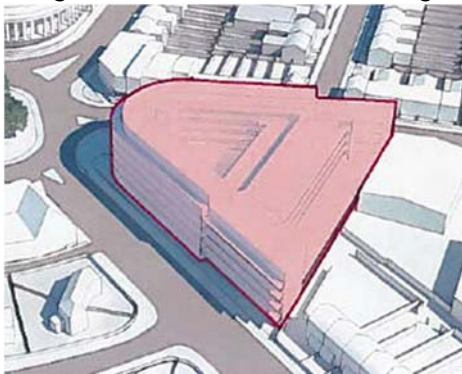
- 4.2 07/00103/P - Use as MOT testing station. Permission Granted. 26.03.2007.
- 4.3 10/03769/P - Alterations to elevations to include over cladding and increase in height of parapet; replacement of doors/windows to the south-west/south-east elevations. Permission Granted 10.01.2011.
- 4.4 18/05648/LE - Existing use of premises as Sui Generis car show room. Lawful Development Certificate granted on 16.01.2019.

*Pre-application discussions*

- 4.5 The first pre-application made by the current applicant was under reference 20/06632/PRE and submitted on the 18 Jan 2021. However, there have also been a number of pre-applications over the last few years (17/02276/PRE, 18/03315/PRE and 19/00780/PRE), which have informed the evolution of the site.

17/02276/PRE

*Image 6: 17/02276/PRE massing*



18/03315/PRE

*Image 7: 18/03315/PRE massing*



19/00780/PRE

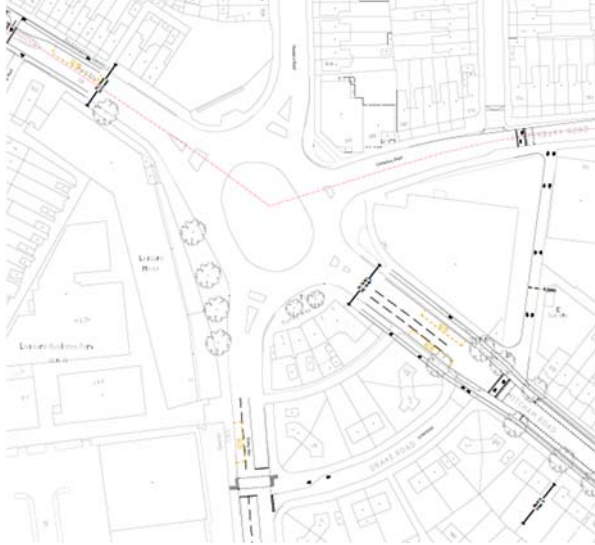
*Images 8 & 9: 19/00780/PRE CGI's*



- 4.6 It should be noted that none of the above iterations allowed for the possibility of a cycle route through 121 Canterbury Road. The aim behind this is to form a

network of quiet routes around Lombard Roundabout, similar to that shown in the map below, which has a very high rate of accidents for cyclists.

*Image 10: feasibility design for emerging cycle scheme (produced by the Council 2019)*



- 4.7 Although the maximum height has increased to 8 storeys (on the corner) the current applicant has included a cycle/pedestrian route within the proposals and retains a stepping up in height towards the corner.

20/06632/PRE (previous pre-app by same applicants)

*Images 11 & 12: CGI of scheme and ground floor plan*



## Proposal

- 4.8 Following feedback from the PRP, the applicant has revised the scheme. This proposal now involves the following;

- Demolition of the buildings on site
- Erection of buildings ranging in height from 4-8 storeys
- Provision of 93 flats (3 less than PRP)
- 23 car parking spaces (including 4 blue badge spaces)
- Outdoor space on decking and rooftops
- Indoor communal spaces
- Public pedestrian / cycle route through the site

4.9 The current unit mix would be as follows;

Occupancy	Units	% Mix
1 bed 2 person	24	25.8%
2 bed 4 person	38	40.8%
3 bed 4 person	10	10.8%
3 bed 5 person	21	22.6%
Total units	93	100%

*Images 13 & 14: visual of current scheme*



## 5. PLACE REVIEW PANEL FEEDBACK

5.1 An earlier iteration of the current designs were presented to the Council's Place Review Panel on 1 April 2021, see images and plans below.

Images 15, 16 & 17: Visual and ground floor plan



### 1. Site Analysis

The Panel was concerned that the architectural massing and heights were too complicated and lacked confidence due to the product of designing from constraints, rather than the opportunities.

It was observed that the rationale behind materiality (grey bricks for the urban, Mitcham Road, side and red bricks for the terracing found along Canterbury Road) has led to an overly complicated scheme which lacks identity and fails to integrate into its surroundings.

The Panel recommended using the adjacent Lombard House as precedent for how a building sympathetically merges a curved building into its context.

### 2. Character Areas

The Panel acknowledged the site has not been earmarked for commercial use, however The Panel recommended creating a building which represents its future community, and creating a building with an identity with appropriate ground floor uses, keeping in mind community uses.

### 3. Architectural Analysis

The Panel highly recommended to go back to an opportunities-led and landscape-led approach, instead of a constraints-led approach which is resulting in a scheme with poor quality architectural, landscape and public realm solutions. The focus should be placed on delivering a high quality accommodation and enhancing the proposed cycle/pedestrian public realm – a unique feature to be celebrated character of the site.

#### 4. Architecture and landscape

The Panel recommended the architecture and landscape work together to step up from the street to create ecological pieces which relate to the public realm, the podium courtyard, amenity spaces and roof gardens.

In general, the Panel encouraged the Applicant to take advantage of the corner to create something that is special by thinking about community, identity and ownership from the future community, regardless of age group.

The Applicant should also consider this area of Croydon which, with the Purley Way Masterplan, will improve over the years, so thinking about a new, post-Covid approach to design in regards to more people will be home-working, creche's, ecology and landscape is required.

#### 5. Massing

The Panel agreed the 7-storeys height in the corner element is acceptable with the sides at a lower height, but more work is required to design a confident 'gateway' building, considering what a contemporary 'Croydon' building could look like.

The Panel were concerned about the relationship between the wings of the building and the awkward corner element and the corresponding relationship to the podium courtyard and roof garden spaces. The heights, architectural form and articulation of the wings, specifically, were felt to be too complicated and created poor quality spaces with regards to overlooking (from the walkway), room layouts and relationships to the cores.

The Panel also felt that any development over 65-units should have at least 2 large cores; these cores need to be able to easily accommodate a number of residents at the same time and provide generous space which is legible on the ground floor. The Panel recommended that if more people are to be working from home, the internal spaces needs to be more generous, with play spaces are created for different ages.

#### 6. Quality of Accommodation

The Panel were concerned the internal layouts were too deep and poorly laid out, creating awkward relationships between bedrooms, dining, kitchen and living room areas and bedrooms overlooked from the walkway. The Panel felt that the flats are not well-planned and feel rushed. The Panel strongly recommended the team take on board the comments in this report and create a proposal that is less dense, less complicated and less high (on the wings) in order to create better quality accommodation.

The Panel pointed out that the ground floor units, being single-aspect, and accompanying private outdoor amenity space along a busy street frontage does not create high-quality units.

Landscape - Upon review, the panel felt the sunlight studies highlighted that the podium courtyard would be in shade much of the day/year which is not appropriate for this scale of development and its aspiration of creating high-quality community spaces. This should be addressed alongside the architectural massing of the wings in order to create better relationships between the internal spaces and the outdoor amenity space.

The panel recommended an intergenerational and integrated approach to play and garden design on the podium courtyard, creating a space for all to use and enjoy and avoiding segregation of spaces.



## 7. Street frontage

The Panel pointed out that the ground floor doesn't work, having single-aspect units and private outdoor amenity space along a busy street frontage is not appropriate.

The suggestion is to enhance this public realm, try to amplify it, introduce integrated public art into play/lighting and high-quality planting and trees and propose an appealing landscape treatment.

The Panel queries the ground floor frontages and asked if they could be activated. It was felt that there are opportunities for a generosity of space for different age groups, such as: teenagers, highspeed internet hot-desking, crèche, cycle storage and space for elders groups for example, in these areas.

- 5.2 In general, the Panel encouraged the Applicant to review and reconsider the height (of the wings), massing, the relationship to the street and the podium courtyard, quality of accommodation and public realm in order to improve its condition.

## 6. SUMMARY OF MATTERS FOR CONSIDERATION

- 6.2 The main matters for consideration in a future submission are as follows:

- Principle of Development
- Design and Townscape
- Impact on Adjoining Occupiers Living Conditions
- Mix and Quality of Accommodation Provided
- Highways
- Environment
- Other matters
- Mitigation

### **Principle of Development**

#### **Loss of existing use**

- 6.3 London Plan Policy E7, Industrial intensification, co-location and substitution, supports residential development proposals on Non-Designated Industrial Sites and Croydon Local Plan policy SP3 has a 4 tier approach to retention/protection of industrial/employment activity
- 6.4 Although the site could be termed as an employment site, there are not industrial and warehousing activities on the site. The (vacant) car show room is classified as a Sui Generis use and is therefore not currently protected by Croydon Local plan industrial / employment policies. As there are no typical industrial activities taking place it is also not considered to be an industrial site for the purposes of the London Plan policy E7 and as such there is no objection in principle to the loss of the car show room.
- 6.5 Although the document is still currently in draft form the Draft Purley Way Masterplan does not seek to retain the current use. This will need to be reviewed depending on when any future planning application is submitted.

### Introduction of residential

- 6.6 London Plan 2021 policy H1 has a 10 year housing target for Croydon of 20,790 units. 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/neighbouring businesses/amenity etc. Residential use in this location is acceptable, subject to satisfying the criteria of other relevant policies.

### Draft Purley Way Masterplan

- 6.7 The site is within the Purley Way Masterplan area, but just outside of the boundary for Valley Park Centre. Guidance about how this particular site should come forward is included on some of the detailed pages (including ground floor uses, active frontages and movement etc.) The proposed guidance suggests 65 units, with some 'town centre (retail/community/leisure)' uses at ground floor level.
- 6.8 This is currently a draft document and therefore given 'limited' weight. However, the closer it gets to adoption the greater the weight that can be afforded to it. That being said, without this document being adopted any commercial use on the ground floor would be 'out of town', which would go against the Local and national policies that aim to direct such uses to town centres.

## **Design, Townscape & Heritage**

### General

- 6.9 Croydon Local Plan 2018 states that a tall building is a building that is 6-storeys (25 metres) or which is significantly taller than its surrounding buildings.
- 6.10 The development plan contains a plan-led approach to guiding the location of new tall buildings, which in the case of Croydon would be within the Opportunity Area Planning Framework (OAPF), central or edge area. Strictly speaking as the proposed development, which includes a taller corner element, would be a departure from the plan as it sits outside the OAPF and its tall building zones. Place Specific Policy DM36.3a also states that developments should be between 3-6 storeys. However, given the scale of the other blocks around the Lombard Roundabout the additional height, above 6 storeys, at a similar scale could be deemed acceptable (subject to satisfying other relevant matters like micro-climate and daylight/sunlight).

### Massing

- 6.11 The height to the corner remains at 8 stories, one more than the advice of the Place Review Panel. This also contravenes the Place Specific Policy DM36.3a which states that developments should be between 3-6 storeys.
- 6.12 However, the principle of having a taller massing to address the corner is acceptable, provided it is well-resolved and material considerations outweigh the strict policy departure. Since the PRP a townscape, heritage and visual impact assessment with a number of views has been submitted. Townscape views have now been provided, which is welcome and four are copied below.

*Image 18: view from Mitcham Rd, junction with Ockley Rd*



*Image 19: view from Boston Rd, junction with Lancing Rd*



*Image 20: view from Canterbury Rd, outside 150 Canterbury Rd*



*Image 21: view from Mitcham Rd, junction with Fairmead Rd*



6.13 Whilst the building would be visible from a number of viewpoints officers are comforted that the massing is appearing acceptable in townscape terms, and that the development works as a marker for the Lombard roundabout, which will effectively become the northern gateway to the Purley Way Masterplan area (although in draft). However, more information (including contextual sections) will be required to further demonstrate the relationship to the existing, predominantly low rise context.

6.14 It should be noted whilst the Place Policy seeks to facilitate growth by stating proposals should complement the existing predominant building heights up to a

maximum of 6 storeys, the applicant has refrained from using this height across the whole of the site. The 'wings' have reduced by one storey from the PRP scheme, and are now at 6 storeys, stepping down to 4 to mediate between contextual terraces. This is an improvement along with the footprint of the wings being rationalized.

6.15 Whilst it is appreciated that the corner element is higher than 6 storeys the scheme has been developed without building on the widest part of the site, which is given over to a pedestrian / cycle route, part of the design that is very much welcomed. In addition the grouping over 2 floors works well in terms of the architectural expression, and this goes some way to justify 8 rather than 7 storey on the corner.

6.16 The articulation of corner balconies, setbacks and top floor 'dormers' appears successful, particularly in views up from Mitcham Road.

*Image 22: drawing to show 2 floor expression*



*Image 23: view from Mitcham Road*



### Layout

6.17 As above indicated above offsetting the mass from the eastern boundary to provide a new cycle / pedestrian route through the site is strongly supported, as it would help facilitate and provide a key link in the Council's planned network of a quiet route around Lombard Roundabout.

6.18 The building footprint has been also been rationalized and now creates a strong building line with a positive relationship to the Lombard Roundabout. Although it is not entirely clear from the documents whether the pavement around the site will become wider as some land is given over from the site. This will provide greater breathing space for pedestrians, particularly around the bus stop and street trees so is also welcomed.

6.19 A significant and positive change from previous designs is the introduction of two large ground floor communal areas for residents (see Image 25 below – shown in green). These also have the added benefit of providing a double height active frontage to the corner facing Lombard Roundabout and a natural surveillance to the cycle and pedestrian route. Both these communal spaces also have direct access to the building cores. It is suggested that to make the most of these spaces the applicant should start to define a brief for what use these spaces may be. Generally the amount of inactive frontage has been reduced in response to previous comments and welcomed by officers.

6.20 The position of the two cores (one in the inside of the corner and the other on the southern wing) is broadly the same as before. Officers previously raised concern about the (small) size, the cores appearing quite close together and that on some floors there were more than 8 units served by a core (e.g. 11 units are served by 1 core below, which is above the design standard of 8). Since the previous comments (and those made by the PRP) the generosity and capacity of both cores has increased, however, some floors still have more than 8 units served by a core. The applicants have since explained that this core layout is being led by the tenure and affordable housing provision. In this case officers would expect a supporting statement from a registered provider(s) to explain why this layout is required. It is appreciated that the offsetting of the built form does limit the space on the site.

*Image 24: typical floor plan*



*Image 25: ground floor plan*



#### Landscaping and Public Realm

6.21 Vehicle access is from Canterbury Road, and the rest of the route will be a soft landscaped public space, with pedestrian/cyclists priority. Covered car parking with a decked amenity area on top is supported, subject to the decking being of a sufficient depth to accommodate the soft landscaping and making sure that appropriate hardstanding is used for the cycle lane.

6.22 The inclusion of an additional accessible roof terrace has improved the communal amenity offer from previous iterations and the general landscaping strategy now seems much better resolved.

#### Design

6.23 The ground floor duplexes have been made wider to achieve better internal daylighting. This is welcome, however the internal layouts are still problematic in terms of fire separation and access through kitchens, which will need to be resolved. It is however, positive that the duplexes now have a direct link out onto the podium garden, with an additional private amenity area at the first floor level.

6.24 The deck access has been split into the distinct parts, each served by one core. This could be acceptable as it has an integral defensible planted zone in front of habitable room windows to protect future occupier's privacy.

Image 26 & 27: deck access visual and section



6.25 It is noted that the Ruskin development for deck access (as recommended by PRP), and 433A Brighton Road are successful examples of integrating planting into deck access.

6.26 The addition of a roof garden to both wings (since PRP) is welcome and supplements the main deck area and internal communal spaces. Further information is needed to understand which residents can access each amenity space and it will need to be demonstrated that the roof terraces would not create any overlooking issues with neighbouring gardens.

Image 28: plan of landscaping areas



6.27 The majority of units are now dual aspect, and all the single aspect north facing units have been removed, which is a vast improvement on previous iterations. However, acceptable internal lighting to the units will still need to be demonstrated.

#### Architectural Expression

6.28 The architectural expression has simplified and improved since the last iteration. The taller massing is expressed in a contrasting concrete frame, with the floors grouped over two levels. Officers recommend that the fenestration should be grouped over 2 floors to strengthen this narrative. In some bay study drawings, window proportions appeared to be grouped over 3 floors, which muddles this narrative somewhat.

- 6.29 The chamfered façade within the frame is an interesting feature which responds positively to the junction and helps give depth to the façade. The design and materiality of the screening between these feature balconies will be critical.
- 6.30 The vertical fins get skinnier as you move up the building, which helps the top floor feel more lightweight. The details of soldier coursing window head/cills all appear well resolved. It is however, imperative that sufficient depths to windows reveals of at least 225mm are included within the design which will give relief to the façade. Slim profile aluminium frames would ideally be specified.
- 6.31 The wings are expressed in 2 brick tones, which is supported in principle. However, officers would like to have more information on how the different brick tones turn the corner. It is also suggested that pigmented concrete is preferable to painted concrete as it is more robust and easier to maintain.
- 6.32 As stated above officers welcome the expression of double height residential amenity spaces and communal lobbies on the elevation.
- 6.33 A public art strategy will need to be formed as part of any submission and the earlier that this is considered the more successful it will be.

#### **Impact on Adjoining Occupiers Living Conditions**

- 6.34 Separation distances to residential properties to the north and south of the subject site are sufficient to avoid unacceptable levels of overlooking/loss of privacy. In terms of daylight/sunlight, early information submitted to officers suggests that there will be some impact upon the surrounding context, in terms of daylight, but where transgressions occur they are in-line with those typically achieved in urban areas. Annual sunlight levels would comply with BRE guidance, although significant reductions in winter-sun are likely to occur to some of the Canterbury Road terraces (to the north), but at least 1 habitable room window per property would meet the guidance. Officers would need to see the full report to further understand and assess the overall impact of the massing on adjoining owner's daylight/sunlight (particularly those on Canterbury Road).
- 6.35 The use of No.330 Mitcham Road is not entirely clear as although the building presents as a house, there is no garden and the rear and side of the plot is entirely covered in hardstanding and used for parking a large number of vehicles. This neighbour has no flank windows. There are a few proposed windows (1<sup>st</sup>, 2<sup>nd</sup> and 3<sup>rd</sup> floor), located on the angled part of the flank elevation that would have views towards this neighbouring property, albeit towards the mid and rear of the rear outdoor space. Although further understanding of this property is required, it is noted that the proposed windows are secondary so could either be obscured or further angled away from the rear space (the latter is officers preference). Notwithstanding this would be prudent to not prejudice the development potential of the neighbouring site.
- 6.36 The building is separated from 115 Canterbury Road, which also has no flank windows, so it is not envisaged that there would be any harmful impact on outlook and light to this property. There are some proposed windows that face towards these properties, but given the combination of the current adjacent use (commercial) and the separation, it is not envisaged that there would be any harmful overlooking or a loss of privacy from the building.

Image 29 & 30: existing aerial view of site and extract from 2<sup>nd</sup>/3<sup>rd</sup> floor plan



Image 31: No.115 Canterbury Road

Image 32: 330 Mitcham Road



- 6.37 Due to the presence of the amenity deck and roof terraces careful thought will be needed to make sure there is no overlooking from these outdoor areas to the neighbouring properties, whilst not creating any light/townscape issues from possible screening.
- 6.38 Careful thought / selection of screening of outdoor play/amenity spaces and the cycle/pedestrian route is required so that any noise and general disturbance is minimised.
- 6.39 Given the 8 storey element of the buildings and the proximity to residential properties an early indication of the wind impact is important. This is yet to be received due to the applicant seeking to ratify the massing from a townscape perspective. The outcome from such a report needs to be known (alongside other aspects e.g. daylight / views etc) to establish the acceptability, or not, of the taller element.



## **Mix and Quality of Accommodation Provided**

- 6.40 The proposal aims to provide 93 homes. The current drawings show all the ground floor units as duplexes and then all other flats at first floor and above are single level. All the duplex units have their own ground floor front entrance and there are two main entrances through the shared communal space areas. There is associated vehicle entrance off Canterbury Road, which leads to the undercroft parking. The floor plans form part of a design pack and are not scalable (not unusual at this stage) so limited assessment can be made on the quality of the proposed units or the developments compliance with accessibility standards.
- 6.41 Croydon Local Plan 2018 (adopted February 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 0, 1a, 1b, 2 or 3) shows a requirement of 60% 3+ bedroom units unless there is agreement from an affordable housing provider (that these are not viable or needed).
- 6.42 The proposed development would provide 31 x 3 bedroom units, which equates to 33%, which has increased from previous iterations, but still falls below the required 60%. This will need to be increased.
- 6.43 It has been made clear that minimum floor areas (London Plan and National Standards) must be complied with and the private amenity space must meet the minimum required relevant to the unit size. The current floor plans show that all the duplexes have been redesigned and widened creating a much better layout.
- 6.44 London Plan standards are clear that developments should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. Previously there was strong concern regarding the amount of single aspect north facing units, however, these have all been removed. The exact number of dual aspect units is not known, but the majority of the units appear to be dual aspect, which is welcomed, but again acceptable internal lighting will need to be demonstrated. Regardless of the final layout, daylight adequacy analysis must be submitted to illustrate that all habitable rooms within the development proposals will achieve the minimum target ADF values set by BRE Guidance.
- 6.45 Schemes should avoid having no more than 8 units to a core per floor, which appears not to have been achieved on some floors. This is addressed above and officers welcome any further evidence on this matter.
- 6.46 Preliminary landscaping plans have been provided demonstrating that communal amenity space and playspace would be provided primarily on the deck level, and supplemented by roof terraces, which is accepted. Defensible space at first floor to the residential units have increased from the previous iteration and helps to improve privacy for these occupiers.
- 6.47 Calculations of playspace have not been carried out, although this is not expected at this stage as they are based on the potential child yield of the final submission. However, it is noted that from the design pack that over 5's play will

be made via off site contributions. In the first instance play space for all the children should be provided on site. Given the number of outdoor spaces and possible creative use of the large communal spaces the full quota of play space should be accommodated on site.

- 6.48 The main entrances to the building, on the corner and midway along the new route are well situated and clearly visible from the street. The number of entrances and larger communal spaces provide a good level of activity, especially considering the constraint of a busy road network.
- 6.49 The applicant is aware that housing should cater for residents' changing needs over their lifetime and that 10% of units would need to be wheelchair accessible and 90% adaptable. It is noted that four lifts are included, 2 to each core, which is supported. The applicant should note D5 of the London Plan in relation to the need for a fire evacuation lift per core, and a fire statement will be required as part of any formal submission (D12 of the London Plan); this should be developed as part of the pre-application alongside our Building Control team.
- 6.50 The impact of noise and air quality on residential amenity will need to be considered, especially as the surrounding roads make up a busy part of the road network. The applicant will need to demonstrate how internal areas and balconies achieve an acceptable standard, accordingly noise and air quality assessments are expected with any future application.

#### Affordable Housing

- 6.51 Prior to the PRP comments it was understood that the applicants aim was to achieve 30% provision with Registered Provider (RP) interest, however some of the changes that have been made post PRP could impact on viability. At the time of writing, no formal details have been provided in regards to this, or an update on the affordable housing offer in general.
- 6.52 The Council would aim for 50% provision (with an expectation of at least 30% by habitable room), with a 60/40 split in favour of Affordable Rented homes as set out by Policy SP2 of CLP 2018.
- 6.53 It is appreciated that the provision of a public cycle / pedestrian route has an impact on the development footprint, which has a knock on impact on the scheme including viability.

#### Highways

- 6.54 The site fronts Canterbury Road, Mitcham Road and the roundabout on the A23, known locally as Lombard Roundabout. Transport for London will need to be consulted as Highway Authority for the A23. The A23 is a Red Route and the side road parking restrictions extend some distance into Canterbury Road and Mitcham Road. Canterbury Road has double red line and double yellow line parking restrictions extending beyond the site frontage. The site frontage to Mitcham Road has double red line parking restrictions and an off-peak Red Route loading bay. The site has vehicle access points in Canterbury Road and Mitcham Road.

6.55 The PTAL level is 2 (on a scale of 1 to 6b), which is considered to be a low/poor level of public transport accessibility. There are bus stops outside, 170m and 210m away and a tram stop around 210m away. Canterbury Road is in a CPZ which is operational 7 days a week, 8am-8pm.

Trip generation

6.56 The site was previously utilised as a car show room with a workshop area for servicing and as such had a significant number of vehicular trips associated with it. The proposed development reduces the amount of vehicle trips to and from the site, including peak hours. Overall the impact on the local highway network would be acceptable.

6.57 Trip generation does show that there would be a high percentage of bus, rail and walking trips and as such a sustainable travel contribution would be required. TfL would also provide further input into these matters, and are likely to also ask for a contribution.

Residential Parking

6.58 The London Plan 2021 has maximum parking standards for a scheme in this area is as follows;

*Image 33: Car parking standards*

Outer London PTAL 2 – 3	1 – 2	Up to 0.75 spaces per dwelling
Outer London PTAL 2 – 3	3+	Up to 1 space per dwelling

6.59 The currently proposed accommodation schedule would create a maximum parking requirement of 77.5 spaces or 0.83 per unit (with the current housing mix). 23 car parking spaces are proposed (0.25 per unit), 21 within the undercroft and 2 outside (near to the Canterbury road entrance). Four of these are accessible parking spaces shown close to the core/lifts.

6.60 Whilst 23 spaces is within the maximum allowance, the under provision will need to be worked through and any associated impact or potential overspill understood. On this basis parking stress surveys were requested and have been undertaken on surrounding roads.

6.61 The headlines of the parking survey are:

- Overall parking stress within the survey area was recorded as:  
 Tuesday - 77% on unrestricted roads, 93% in CPZ; and  
 Wednesday – 75% on unrestricted roads, 93% in CPZ.
- This equates to remaining free car parking spaces in the order of:  
 Tuesday – 35 spaces on unrestricted, 12 in CPZ; and  
 Wednesday – 37 spaces unrestricted, 12 in CPZ.

6.62 In terms of parking stress 85% is considered as being at capacity, so the surrounding roads, outside of a CPZ, are below this allowing for some overspill. However, it would not be acceptable for this development alone to overspill onto the public highway and take up all the available spaces up to the threshold.

6.63 In addition to utilising some of the surrounding road space there is the potential for further mitigation by the provision of car club spaces, which can be used to offset required car parking spaces, which is accepted by officers. In Croydon, as an outer London Borough, 10 cars could be replaced by 1 car club space. In addition as the site is in a Controlled Parking Zone it is expected that resident parking permits will be removed via a legal agreement.

6.64 With regard to disabled parking provision, the London Plan requires a minimum of 3% of the overall provision to be provided for disabled users from the outset with a further 7% identified as larger spaces to be converted if demand requires. Therefore at least 3 dedicated disabled parking spaces would be required on the site from the outset and officers would expect the additional 7% to be identified prior to any planning permission being granted. 4 disabled parking spaces are shown, but do not have access hatching both sides and the top two are not appropriately aligned. Further work is required on this matter, but should be solvable.

Image 34: Disabled car parking spaces



Cycle parking

6.65 London Plan minimum cycle parking standards are as follows;

Image 35: Cycle parking standards

Use Class		Long-stay (e.g. for residents or employees)	Short-stay (e.g. for visitors or customers)
C3-C4	dwellings (all)	<ul style="list-style-type: none"> <li>• 1 space per studio or 1 person 1 bedroom dwelling</li> <li>• 1.5 spaces per 2 person 1 bedroom dwelling</li> <li>• 2 spaces per all other dwellings</li> </ul>	<ul style="list-style-type: none"> <li>• 5 to 40 dwellings: 2 spaces</li> <li>• Thereafter: 1 space per 40 dwellings</li> </ul>

6.66 A number of built in cycle storage spaces have been shown spread around the ground floor of the development, which is supported. At this stage the storage capacity is not known, but the applicants have been made aware of the above requirements. There is plenty of space for visitor cycle spaces around the site

frontage, especially near the indoor communal spaces, which would be a sensible place for location.

#### Pedestrian / Cycle route

- 6.67 A proposed 4m wide pedestrian / cycle link runs along the eastern boundary set within a landscape outdoor space. In principle this is supported by officers as an integral part of the Councils plan to re-direct cyclist from the Lombard roundabout to a quieter surrounding route. The more technical aspects e.g. transition to the highway, materials and construction require submission and review by the Councils transport officers, but no major issues are anticipated. It is expected that the ownership of the link route would remain with the applicant along with the responsibility for the future maintenance. In addition the route would be constructed to appropriate standards and remain open to the general public at all times. All of this would need to be secured within the legal agreement.




#### Access / Deliveries

- 6.68 In terms of cars, the drawings show an access to the car park from Canterbury Road and the current Mitcham Road crossover being closed, meaning the lowered kerb will need to be re-instated. This arrangement is acceptable and will stop any possible rat running through the site.
- 6.69 It is proposed that servicing and deliveries, for smaller vehicles, are to be accommodated on site, but details of a dedicated loading area are not clear and further understanding of this is required. The most recent iteration also shows a much smaller turning area, so it needs to be re-demonstrated that this is a suitable space for loading and turning. When an acceptable space is achieved careful management, via a servicing management plan, will be needed.

*Image 36: Loading/turning area*



- 6.70 It is proposed that less regular deliveries undertaken by larger vehicles (including refuse collection) can utilise the existing loading bay on Mitcham Road to the south of the site. In terms of the Canterbury Road side there are four potential options for servicing, which are either;

<p>Using the existing red route cage loading area on the northern side of Canterbury Road</p>	<p><i>Image 37: View of Canterbury Road</i></p> 
<p>Moving this loading area to the southern side of the carriageway</p>	<p>As above put with red cage on right hand side</p>
<p>A new loading bay adjacent the site access on Canterbury Road could be provided.</p>	<p><i>Image 38: Extract of a plan showing a new loading bay</i></p> 
<p>Servicing from the double yellow lines</p>	<p><i>Image 39: Plan showing use of double yellow lines for deliveries</i></p> 

6.71 The Council preference is option 4, subject to acceptable tracking being displayed and a review by TfL, as double yellows prevent parking, but not loading. A waste management plan will be required for the site as a whole.

Mitigation

6.72 Contributions (starting point being £1,500 per unit) towards extension to the CPZ and/or improvements to Croydon sustainable transport will be required, along with restriction of access to parking permits if CPZ extended in the future, car club provision / membership and securing the pedestrian / cycle link, as outlined

above. Highway agreements will be required for all changes to the public highway and the adoption of widened footways. TfL may have further requirements and financial obligation requests.

## **Environment**

### **Building performance**

- 6.73 All major development (both residential and commercial), such as this, should be net zero-carbon in accordance with the London Plan energy hierarchy of Be Lean; Be Clean; Be Green and Be Seen. A minimum on-site reduction of at least 35 per cent beyond Building Regulations is required and if zero carbon is not met a cash in lieu contribution is required. Major development proposals should calculate and minimise carbon emissions from any other part of the development, including plant or equipment, that are not covered by Building Regulations, i.e. unregulated emissions. As this scheme will be referable to the Mayor the whole life-cycle carbon emissions should be calculated through a nationally recognised Whole Life-Cycle Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions. Heat Risk needs to be managed and water consumption restricted.
- 6.74 Given that work is mainly still on going in relation to the townscape and transportation matters the majority of these elements are still being developed and further detail will be known when the scheme is advanced. The scheme should be able to meet the requirements.

### **Flooding**

- 6.75 The site is located within Flood Zone 1 and is identified as being an area at critical risk of surface water flooding resulting from heavy rainfall and surface water runoff.
- 6.76 All Major developments in Flood Zone 1 are required to provide a site specific Flood Risk Assessments proportionate with the degree of flood risk posed to and by the development, taking account of the advice and recommendations within the Council's Strategic Flood Risk Assessment and Surface Water Management Plan. A Sequential Test is also required for this development as although it is in Flood Zone 1 the site has been identified at risk from other sources of flooding and is not an 'allocated site' within the development plan.
- 6.77 Subject to satisfying the above requirements and priority given to the provision of Sustainable Drainage Systems (SuDS) unless demonstrated to be inappropriate, the principle of residential development would be acceptable.
- 6.78 The applicants have been advised to undertake separate pre-application consultation with the Lead Local Flood Authority (LLFA).

### **Air**

- 6.79 The whole of Croydon Borough has been designated as an Air Quality Management Area (AQMA). As indicated above an air quality report will need to be submitted with an application. This must include how the ground floor residential units, amenity decks and balconies fronting the adjoining roads are

suitable from an air quality perspective. Should the development increase air pollution or be located in an area subject to breaches then mitigation and/or contributions would be sought.

#### Microclimate

- 6.80 A wind mitigation note or report is yet to be received, ideally received this would be received prior to submission, but would at least be expected to support any planning application.

#### Trees

- 6.81 There are a three trees in the site on the Canterbury Road side and one on the Mitcham Road boundary. It appears from the design pack that these would be removed, which may be acceptable subject to understanding their categorisation and if acceptable suitable replacements and a high quality landscaping scheme that also results in a net gain in terms of biodiversity.
- 6.82 It is understood why an 'Urban Greening Score' has not been produced at this stage, but evidence will be required showing how a future scheme meets the Urban Greening Factor minimum target to 0.4.
- 6.83 There are three street trees within close proximity to the building, although potentially further away than the existing. Dialogue with the TfL (as they are situated on a red route) would be required in relation to this matter. The addition of new street trees to improve biodiversity would be encouraged.

#### **Other Matters**

#### Security

- 6.84 Both the NPPF and London Plan Policy seeks to create safe, secure and appropriately accessible environments where crime, disorder and fear of crime do not undermine the quality of environment. Any future application should be mindful of Secured by Design principles and improve natural surveillance / lighting of the area, particularly related to the public route through the site.

#### **Mitigation**

- 6.85 At this stage it is envisaged that planning obligations will be required to mitigate the impacts. Discussions are forthcoming in relation to the Heads of Terms, but it is anticipated that these would include the following (this is not an exhaustive list):
- Affordable Housing (on-site)
  - Affordable housing review mechanisms (early and late stage)
  - Employment and training (contributions and obligations)
  - Air Quality contribution
  - Zero carbon offset (if required)
  - Future connect to District Heating Network
  - Car parking permit restrictions
  - Car club provision and membership (3 years free)
  - Transport for London contributions
  - Sustainable transport contributions (to include cycling enhancements)
  - Public realm delivery and maintenance



- Highway works
- Securing of cycle / pedestrian route through the site.
- Retention of scheme architects
- Relevant monitoring fees

## **7 SPECIFIC FEEDBACK REQUESTED**

7.1 In view of the above, it is suggested Members focus on the following issues:

1. The acceptability of residential redevelopment of the site.
2. The amount and distribution of scale/bulk/height across the site, particularly when balanced alongside the cycle / pedestrian link.
3. Design approach to the development and elevational details including materiality.
4. Potential impacts on neighbouring residential amenities in terms of light, outlook and privacy.
5. The mix (number of 3 beds) and standard of the accommodation provided.
6. Affordable housing provision and the balance of a reduced footprint / development potential due to the cycle / pedestrian link.
7. Whether the amount of car parking is acceptable if a car club space is provided and contributions to sustainable transport made

## **8 PROCEDURAL MATTERS**

8.1 The applicant has submitted a pre-application to TfL for an opinion on the proposals. A response has not yet been received so officers have not had sight of TfL feedback.