

**1 DETAILS OF THE DEVELOPMENT**

Ref: 17/02680/FUL  
 Location: 28-30 Addiscombe Grove, Croydon, CR0 5LP  
 Ward: Fairfield  
 Description: Demolition of existing buildings including parking garage and redevelopment of the sites for a part 9, 20 and 21 storey building comprising 153 residential dwellings (Class C3) and a single storey sub-station; hard and soft landscaping, cycle and car parking facilities; plant areas and other ancillary works  
 Drawing Nos: 1623-MWS-ZZ-00-DR- A-101078-XX-S2 P01, 1623-MWS-ZZ-01-DR- A-101051-XX-S2 P01, 1623-MWS-ZZ-02-DR- A-101077-XX-S2 P01, 1623-MWS-ZZ-03-DR- A-101060-XX-S2 P01, 1623-MWS-ZZ-04-DR- A-101061-XX-S2 P01, 1623-MWS-ZZ-05-DR- A-101062-XX-S2 P01, 1623-MWS-ZZ-06-DR- A-101063-XX-S2 P01, 1623-MWS-ZZ-07-DR- A-101064-XX-S2 P01, 1623-MWS-ZZ-08-DR- A-101065-XX-S2 P01, 1623-MWS-ZZ-09-DR- A-101066-XX-S2, 1623-MWS-ZZ-10-DR- A-101067-XX-S2, 1623-MWS-ZZ-11-DR- A-101068-XX-S2, 1623-MWS-ZZ-12-DR- A-101069-XX-S2, 1623-MWS-ZZ-13-DR- A-101070-XX-S2, 1623-MWS-ZZ-14-DR- A-101071-XX-S2, 1623-MWS-ZZ-15-DR- A-101072-XX-S2, 1623-MWS-ZZ-16-DR- A-101073-XX-S2, 1623-MWS-ZZ-17-DR- A-101074-XX-S2, 1623-MWS-ZZ-18-DR- A-101075-XX-S2, 1623-MWS-ZZ-19-DR- A-101076-XX-S2, 1623-MWS-ZZ-20-DR- A-101055-XX-S2, 1623-MWS-ZZ-21-DR- A-101056-XX-S2, 1623-MWS-ZZ-22-DR- A-101077-XX-S2, 1623-MWS-ZZ-XX-DR- A-102001-XX-S2 P01, 1623-MWS-ZZ-22-DR- A-102002-XX-S2 P01, 1623-MWS-ZZ-22-DR- A-102003-XX-S2 P02, 1623-MWS-ZZ-22-DR- A-102004-XX-S2 P01, 1623-MWS-ZZ-22-DR- A-103001-XX-S2, 1623-MWS-ZZ-22-DR- A-103002-XX-S2, 1623-MWS-ZZ-00-DR- A-102005-XX-S2, 1623-MWS-ZZ-00-DR- A-102006-XX-S2  
 Applicant: Pocket Living Ltd  
 Agent: DP9  
 Case Officer: Katy Marks

	<b>1 bed</b>	<b>2 bed</b>	<b>3 bed</b>	<b>4 bed</b>
<b>Flats</b>	112	39	2	0

*The 1 bed flats would all be 'Pocket Living' intermediate affordable units. The 2 and 3 bed flats would be market units.*

<b>Number of car parking spaces</b>	<b>Number of cycle parking spaces</b>
4 (all disabled spaces)	201 (including 4 short stay spaces)

- 1.1 This application is being reported to Planning Committee as a major scheme which has previously been presented to committee at pre-application stage the Director of Planning and Strategic Transport considers Planning Committee consideration to be necessary

## **2 BACKGROUND**

2.1 The scheme was presented to planning committee during the pre-application process on 20 April 2017. The following comments were raised by committee:

- Income cap questioned - lower cap suggested and restriction or prioritisation of key workers
- Scale and massing acceptable subject to overshadowing of neighbours
- Support for some level of Pocket Living accommodation in the Borough to meet a niche need
- Mix view of design approach - should be exciting externally, materials important
- Café use or similar suggested to open up the ground floor and encourage activity
- Public living areas and Pocket Living's approach to social interaction between residents welcome
- Importance of capacity of amenity space, use and quality
- Low number of family units
- North facing single aspect units - quality of accommodation
- Parking permits - confirm that these would not be allowed
- Protect the development potential of the church site
- Cycle parking - need more creative ways of providing cycle storage, possibly via lockers that can be used for other storage purposes
- Site visit - request to view one of Pocket's older schemes

Councillor Helen Pollard spoke as ward Member for Fairfield and raised the following points:

- Support for the principle of the development - provision of affordable housing
- Concern about height and scale - impact of overshadowing to neighbours - especially within Garrick Crescent and Granville Close
- Parking permits - how this would be controlled
- Daylight for north facing units and quality of accommodation

## **3 RECOMMENDATION**

3.1 That the Planning Committee resolve to GRANT planning permission subject to:

- A. Any direction by the London Mayor pursuant to the Mayor of London Order
- B. The prior completion of a legal agreement to secure the following planning obligations:
  - a) Retention of scheme architects
  - b) Employment and training strategy
  - c) Restrictions on parking permits
  - e) Car club – 3 years membership
  - f) Contribution to TfL
  - g) Carbon offsetting payment and/or connection to future district energy network

- h) Air quality offsetting payment
  - i) Public realm improvements to the front of the site and shared access road
  - j) Affordable housing including clauses specific to the Pocket product and review mechanisms
  - k) Marketing Methods Plan
  - l) Any other planning obligation(s) considered necessary by the Director of Planning and Strategic Transport
- 3.2 That the Director of Planning and Strategic Transport has delegated authority to negotiate the legal agreement indicated above.
- 3.3 That the Director of Planning and Strategic Transport has delegated authority to issue the planning permission and impose conditions [and informatives] to secure the following matters:
- 1. Detailed Design: Prior to above ground works taking place, full details of the following shall be submitted to and approved by the Local Planning Authority:
    - a. External facing materials including sample boards of all facing materials and finishes;
    - b. Full scale (1:1) mock ups of:
      - A typical panel of principal elevation treatment including vertical format grey glazed tile and interface with finely textured very light grey GRC including mortar joints and showing tile bond
      - A typical bay of top of tower treatment including pleated panels of vertical format grey glazed tile with lighter recessed grey mortared joints
      - A typical panel of translucent Reglit
      - A typical panel of main entrance anodized aluminium in medium bronze
      - A typical panel of ribbed concrete
      - A typical balcony with balustrade in PPC aluminium in medium bronze and balcony edge and soffit in PPC aluminium in medium bronze
      - A typical doubled glazed window unit double glazed windows with frame in PPC composite in medium bronze and horizontal band in PPC aluminium in medium bronze
    - c. Detailed drawings in plan and section at 1:5 (unless otherwise noted below) through all typical external elements/details of the facades including all openings in external walls including doors, access to parking undercoft, bins and cycle stores, all window-types including reveals, heads and cills, all balcony types, all parapet types;
    - d. Details of junctions between external facing materials at 1:5;
    - e. Roof details in plan and section showing the detail of and relationship between roof terrace amenity spaces, solar arrays, plant, extracts and parapets;
    - f. Plans of ground-floor residential entrance lobbies at 1:20, elevations of residential entrance doors at 1:10 and details of entrance-door thresholds;

- g. Details of mechanical ventilation systems or other ducts or extracts (where they appear on any of the development's elevations)
  - h. Details of any rainwater goods
2. Prior to the first occupation, a landscape and public realm strategy to include full details of all hard and soft landscape works within the site shall be submitted to and approved in writing by the Local Planning Authority. Such details shall include, but not be limited to:
- a. Public realm design for: the area to the front of the scheme including the public footway up to the kerbline, the service road and external parking area and adjacent footway up to the kerbline and all roof terrace amenity spaces (including proposed seating, cycle storage and street furniture)
  - b. species, planting density and size of proposed new planting, including girth and clear stem dimensions of trees (including any trees and planting on roof terraces and including details of planters and means of securing trees)
  - c. hard landscaping materials (including samples which shall be permeable as appropriate), including dimensions, bonding and pointing.
  - d. details of junctions with other areas of public realm including drainage
  - e. all boundary treatments within and around the development.
  - f. Details at 1:5 in plan and section of all key hard landscape details including thresholds with buildings, tree pits and surrounds, street furniture, planters, kerbs, junctions between materials and adjacent surface treatments, junctions with any boundary treatments

All landscaping works shall be provided in accordance with the approved details on site before any part of the development is occupied or within such longer period or periods as the local planning authority may previously agree in writing. All planting shall be maintained for a period of five years from the date of planting; any planting which dies or is severely damaged or becomes seriously diseased or is removed within that period shall be replaced by planting of similar size and species to that originally provided.

- 3. Provision of full details of cycle parking, electric Vehicle Charging Points and disabled parking prior to occupation and to be installed prior to first occupation
- 4. Bin store details
- 5. Detailed internal amenity space strategy and internal layout of the ground floor amenity space prior to occupation.
- 6. Provision of detailed Construction Logistics and Environmental Management Plan prior to construction
- 7. Provision of a detailed delivery and serving plan prior to first occupation
- 8. Compliance with Energy Strategy to deliver 49% offsetting and incorporation of design features to make future connection to District Energy Heating
- 9. Water use not to exceed 110 litres per head per day
- 10. 10% of the flats to meet Building Regulations criteria M4(3) (Wheelchair user dwellings)

11. SUDS drainage strategy condition
12. Development to meet Secured by Design New Homes standards
13. Full details of wind mitigation planting, screening and balustrades in accordance with the mitigation requirements of the submitted Wind Microclimate Report and supported by further wind tunnel testing to be submitted prior to construction above ground level and installed/planted prior to first occupation. Mitigation measures to be maintained and retained for life of the development.
14. Details of plant equipment to be submitted
15. Development to be developed in accordance with the Acoustic Report
16. Development to be developed in accordance with the Air quality report
17. External lighting details
18. TV signal mitigation
19. In accordance with drawings and documents
20. Time limit for commencement - 3 years
21. Any other planning condition(s) considered necessary by the Director of Planning and Strategic Transport

#### Informatives

- 1) Informatives requested by Thames Water
  - 2) Removal of site notice
  - 3) CIL liability
  - 4) Subject to s.106
  - 5) Any [other] informative(s) considered necessary by the Director of Planning
- 3.4 That, if by 02/01/2018 the legal agreement has not been completed, the Director of Planning and Strategic Transport has delegated authority to refuse planning permission.

## **4 PROPOSAL AND LOCATION DETAILS**

### **Proposal**

- 4.1 The proposal is for the construction of a residential development comprising a part 9, part 20, part 21 storey building providing 153 flats.
- 4.2 112 of the flats would be 1b1p flats sold at a discounted market rate ('Pocket Living' units), 39 of the flats would be 2b3p flats and 2 of the flats would be 3b4p. These 41 larger flats would all be market units sold at full market rate ('Market' units).

- 4.3 All of the flats are designed in line with National Described Space Standards in terms of internal floorspace standards. 15 of the proposed flats would be wheelchair adaptable.
- 4.4 All of the proposed standard Market units would have private balconies. The Pocket Living units would not have private amenity space. A variety of shared indoor and outdoor amenity spaces would be accessible to all residents of the building. The amenity space proposed is as follows:
- Ground floor – Lobby, lounge, workshop space and circulation space to the front of the building
  - 1<sup>st</sup> to 8<sup>th</sup> floor – Each floor would have a small break out space towards the end of the circulation space
  - 9<sup>th</sup> floor – Large ‘social garden’ roof garden and small ‘roof lounge’ – this is envisaged as space with mixture of hard and soft landscaping, with seating and entertaining space
  - 20<sup>th</sup> floor – ‘Nordic garden’ roof terrace and pavilion – this is envisaged as a quieter space, it would be less protected and therefore more sparsely planted, with low level planting.
  - 21<sup>st</sup> floor – ‘Hidden garden’ roof garden – this would have tall walls enclosing the space with views over Croydon Central, it would provide a mixture of quiet seating spaces and a soft landscaped centre.
- 4.5 The proposals include 4 disabled parking spaces and a large cycle storage area at ground floor. 197 cycle parking spaces would be provided within the building for residents and would be accessible from the front and northern side of the building. 4 visitor spaces would be provided to the front of the building. The details of these would be secured by condition.
- 4.6 Improvements are proposed to the public realm to the front of the building and to the shared access way to the side of the building.

### **Site and Surroundings**

- 4.7 The application site is located on the eastern side of Addiscombe Grove and was until recently occupied by a pair of semi-detached buildings. These buildings have now been demolished (after prior approval for demolition was granted). The buildings were previously in use as offices and an education centre and were unoccupied prior to demolition. The site had private car parking towards the rear of the plot which is accessed via a shared driveway from Addiscombe Grove (immediately to the north of the site).
- 4.8 The surrounding area is mixed use in character. The site immediately to the south of the site is occupied by the United Reformed Church with residential development located further to the south. To the north is Alico House which is an 8 storey building in hotel use. To the east of Alico House is a 5 storey building, known locally as ‘Go-Ahead House’ which is currently in office use. Both of Alico House and Go-Ahead House are located on the opposite side of the shared access way. Further to the north-east, is a vacant development site (30-38 Addiscombe Road) which has permission for residential development up to 6 storeys in height. To the east, the site adjoins the rear part of the church car park. Beyond this is residential development within Garrick Crescent and along Park Hill Road which is between 2-4 storeys in height. The closest

properties along Garrick Crescent are orientated at 90° to the site. The site is located within the setting of the locally listed No.1 Croydon and is within walking distance of East Croydon station and associated bus and tram networks. The site has excellent public transport accessibility (PTAL rating 6b: most accessible rating).

4.9 The following designations apply:

- Croydon Opportunity Area
- Croydon Metropolitan Centre
- Area of High Density
- Addiscombe Grove is a Local Distributor Road

### **Planning History**

4.10 The following planning decisions are relevant to the application:

- 08/00887/P: Demolition of existing buildings and erection of a 7 storey building for use within Class B1 (offices) formation of vehicular access and provision of associated parking, cycle storage, refuse enclosure and electrical plant room- Granted with Legal Agreement (Not implemented; now expired)
- 11/03173/P: Demolition of the existing buildings; erection of a 7 storey building for use within Class B1 (offices); formation of vehicular access and provision of associated parking, cycle storage, refuse enclosure and electrical plant room (renewal of permission 08/00887/P) – Granted with Legal Agreement (Not implemented; now expired)
- 12/01733/P: Use of 28 Addiscombe Grove as an education centre – Granted and implemented. Building now vacant.
- 15/00276/P: Demolition of the existing buildings; erection of a 7 storey building for use within Class B1 (offices); formation of vehicular access and provision of associated parking, cycle storage, refuse enclosure and electrical plant room. Granted with Legal Agreement
- 15/04869/P: Demolition of the existing buildings and the construction of a part 12, part 8 storey building providing 74 flats and 106sqm of flexible floorspace (Use Class A2, B1, D1 or D2) on the ground floor; provision of access, parking and servicing arrangements and landscaping – Granted with Legal Agreement
- 16/05272/PRE: Pre-application engagement - The emerging scheme was considered by Planning Committee on 20 April 2017, at which point it proposed erection of a part 9, part 20-21 storey building providing 153 residential units.
- 17/03071/PAD: Demolition of existing building. Prior approval not required.

4.11 Adjacent sites:

- 30-38 Addiscombe Road:
  - 97/02323/P: Demolition of existing building and the erection of 1x 5 storey and 1x 4 storey buildings comprising 4x 3bed and 32x 2bed flats; erection of refuse enclosures and the formation of vehicular access off

Addiscombe Road leading to 44 on site car parking spaces – Granted and part implemented.

- 16/02864/P: Erection of five/six storey building to provide 31 two bedroom, 14 one bedroom and 16 three bedroom flats; formation of vehicular access and provision of associated landscaping and car parking – Approved with legal agreement

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

- 5.1 The loss of commercial use at the site has previously been accepted and the principle of residential development is acceptable, subject to assessment of other related planning considerations.
- 5.2 The proposed development would contribute positively to the delivery of affordable housing;
- 5.3 The proposed development would be of an appropriate mass and height with a high quality appearance;
- 5.4 The layout of development ensures that the proposal would not have a detrimental impact on the amenity of the neighbouring residents;
- 5.5 The development would provide an acceptable standard of living for future residents of the development in terms of internal accommodation and external amenity space;

## **6 CONSULTATION RESPONSE**

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

- 6.2 The following external consultees were notified of the application:

### **Greater London Authority (Statutory Consultee)**

- 6.3 The application is referable to the GLA under the Mayor of London Order. The Mayoral Stage 1 Response raised the following issues/comments:
  - Affordable housing: 70% affordable housing provision is supported, however the affordability of the units should be addressed by the applicant with officers together with the application of both review mechanisms in accordance with the Draft Affordable Housing and Viability SPG.
  - Design: The current proposals do not represent exemplar residential/design quality to justify the density of the scheme. Further discussions and revisions are required to improve the residential quality, amenity, floor layouts and level of active frontage at ground floor level. These significant concerns need to be addressed before this proposal can be accepted.
  - Inclusive design: 10% wheelchair compliant units should be secured by condition.



- Climate change: Further information is required regarding overall energy performance in order to enable a full assessment against London Plan climate change policies. The drainage hierarchy should be considered before stage 2
- Transport: Various transport plans are required to be secured in the s106 agreement together with a s106 contribution towards projects identified in the Croydon DIFS is which will be determined once the trip generation has been revised.

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

#### 6.4 TfL have made the following comments:

- Pedestrian access: It has been proposed to provide an additional pedestrian access for disabled users adjacent to blue badge parking which will lead them to lifts which is welcomed.
- Trip generation: The proposed trip generation is too low especially when compared against rates used for the previous assessment and net increase in total person trips is being underestimated. The TRICs assessment should be updated. [*Officer comment: Updated information presented to TfL*]
- Parking: the draft Travel Plan states that residents will be excluded from applying for parking permits within the local CPZ which is welcome and should be secured through s106. One active electric vehicle charging point (EVCP) is welcomed but passive EVCP should also be provided. Car club spaces have been identified in the TP and free membership is welcomed and should be secured through s106.
- Cycle parking: 194 long stay and 4 short stay spaces are welcomed [Now 197 + 4]. It is understood that the long stay spaces will be provided within a bike storage facility on ground floor which will also provide a workshop for bike repair services. Although welcomed, the applicant should confirm how these spaces will be accessed.
- Pedestrian environment: TfL request a PERS (Pedestrian environment review survey) or similar survey be undertaken. A survey is requested on pedestrian links and routes to the nearest public transport and local amenities in each direction.
- Travel Planning: TfL welcomes the draft TP and has assessed it. It is understood that a baseline survey will be undertaken within 6 months of occupation and that surveys to monitor the TP will be conducted 1, 3 and 5 years post occupation. All surveys should be TRICS compliant. It is welcomed that a Travel Plan Co-ordinator (TPC) will be appointed but the responsibilities of the TPC should be made clear in the TP. The action plan in the TP is welcomed but the actions should also be set for short / medium / long term. A final version of the TP should be secured through s106.
- Delivery, Servicing and Construction: A draft DSP has been submitted. The estimated number of servicing trips is welcome. It is also welcome that all vehicles will be able to entre/exit the service road in forward gear. It is requested that the applicant commits to preventing delivery and servicing

related vehicular movement from being undertaken in the peak period (8-9am and 4.30-8pm). The use of banksmen is welcome. The CLP should have an indicative work programme with information on works to be undertaken and their timescales. A final version should be secured by condition.

- Contribution: The Croydon Development Infrastructure Funding Study (DIFS) identified a number of critical transport projects and concluded that there is a significant funding gap. Given TfL has identified a number of key tram projects in Croydon, TfL requests that s106 contributions are secured in order to help close the funding gap identified in the DIFS. Subject to the trip generation being revised, an appropriate level of contribution will be confirmed.

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

- 6.5 The LLFA commented that they do have no objection to the proposals provided that conditions are attached should consent be granted to deal with sustainable drainage.

### **London Borough of Croydon – Transportation**

- 6.6 The Council's Transport Planning Team made the following comments:
- The site is located in an area with the highest PTAL rating of 6b and therefore affords itself to a car free development subject to provision of disabled and cycle parking.
  - 4 parking spaces would be acceptable
  - Croydon expects 50% of Blue Badge bays to have an EVCP installed, since Motability users are early adopters of electric and plug-in hybrid vehicles. The CLP requires passive provision on all of these bays, ie sufficient power to be available and a clear, uninterrupted, ideally ducted, route for power so that more points can be installed as required.
  - Cycle storage is provided for 197 cycles in a storage area within the ground floor of the building and an additional 4 spaces are provided for visitor parking adjacent to the pedestrian access. This accords with the London Plan standards and is therefore acceptable.
  - Refuse storage is located adjacent to the access road and it has been demonstrated that both refuse and delivery vehicles are able to turn on-site so as to enter and leave in a forward gear.
  - The Transport assessment includes a parking beat survey, which indicates that there is some limited capacity for some on-street parking in the area. However the site is within a controlled parking zone and future occupiers should be restricted from applying for on-street parking permits. This is referred to in the Travel Plan and should be secured by s106.
  - Overall the Travel Plan attempts to encourage a continued shift towards more active travel, having established the site as being suitable for a car free development. The targets for increasing walking and cycling are good, and realistic.
  - The developer should provide funding for membership of a carplusUK approved car club, on request, for 3 years. This is to be offered in the marketing material for the site, available from first residential occupation of the site and to subsequent occupants of any given unit during the three year period. As ever, the lack of car club provision on site is a problem.

- The car club vehicles identified are not very close physically and in any case contracted for council staff only during officer hours. This means they are available evenings and weekends, but there will be several other major residential developments far closer to those vehicles so little weight can be given to their presence.
- Having 3 years membership will make it easier for the council to continue negotiating with parking services over the provision of a bay on Altyre Road or Hazledean Road or other location nearer to this site. A contribution will be needed to the costs, including for a public EVCP.
- Car club requirement: 2 car club bays required. Off-site car club contributions for each space: £2,050 for Traffic Management Order; £500 signing and lining; £2,500 contribution to EVCP; plus compensation for loss of income to be agreed with Parking Services.
- The Demolition/Construction Logistics Plan is considered acceptable as a framework document and a full DCLP should be secured by condition and an informative added that the applicant should consult the Network Management team on matters affecting the public highway at least 3 months prior to the commencement of works on site. It is noted that peak hour deliveries will not take place, which is welcomed.

## **London Borough of Croydon – Environmental Health**

6.7 The Council's Environmental Health team commented as follows:

- The applicant should follow the recommendations of the acoustic assessment by Vanguardia dated May 2017 (ref: VC-102363-EN-RP-0001)
- The applicant should follow the recommendations of the air quality assessment by Air Quality Assessments Ltd dated 10th May 2017 (ref: J0111/1/F1)
- The applicant should observe the Council's Code of Practice entitled 'Control of Pollution and Noise from Demolition and Construction Sites' as well as the Mayor of London's Best Practice Guidance 'The control of dust and emissions from construction and demolition'.
- The site will require an Air Quality Dust Risk Assessment (AQDRA). This should include a written statement of the commitment for the purposes of monitoring and enforcement.
- An environmental management plan (to include control of noise and dust from construction and demolition activities and a construction logistics plan (CLP)) must be submitted and approved. The plan must be submitted to this department at least 3 months prior to the commencement of the works for approval.
- In accordance with guidance from the Institute of Lighting Engineers, light from the proposed illuminations should not cause a nuisance to local residents. The applicant should comply with the most recent ILE Guidance Note (2005); in addition they should have regard to the following: Lighting the Environment – A Guide to Good Urban Lighting Chartered Institution of Building Services Engineers, (CIBSE) and Institution of Lighting Engineers (ILE) 1995.
- Because of the increasing relative contribution of non-road transport sources of emissions of air pollution to breaches of the air quality objectives and the exposure reduction target, the Council considers that development should play a greater role in improving air quality. As such the development would

be contrary to Policies EP1, the Council's Air Quality interim policy guidance and the Air Quality Action Plan (AQAP). The Council will impose conditions, or seek a planning obligation, to implement this policy. Therefore some form of mitigation on site, to be confirmed by the Pollution Team ( for example putting into operation a Low Emission Strategy for the site), or a contribution to an air quality fund which funds actions in the Council's AQAP should be secured by s106. A contribution of £15,300 should be secured through s106..

### **London Borough of Croydon - Sustainability**

6.8 The Council's Sustainability Officer made the following comments:

- The submitted sustainability report is acceptable subject to a zero carbon offset to meet the London Plan 'Zero Carbon' standard
- The offset figure is £130,266 to be secured through s106.
- The development is also compatible with the planning development of a district network serving the town centre
- The s106 agreement should include a clause agreeing that the figure can be reduced in the event that the district heat network proceeds and the development connects to it. Any reduction would be based on the additional carbon reduction provided by connection.

### **London Borough of Croydon – Employment Brokerage Team**

6.9 The Employment team requested the following:

- 34% of construction jobs on site go to local residents
- 1 apprentice per £1mill worth on the development
- Work experience placements where possible
- Working through the Job Brokerage as the initial point of call
- A standard charge for training of £2,500 per £1 million of capital construction costs. From the viability assessment it would appear that this figure would be £86,000 based on £34.4m build costs.

## **7 LOCAL REPRESENTATION**

7.1 The application has been publicised by way of 3 site notices displayed in the vicinity of the application site. The number of representations received from neighbours, local groups etc in response to notification and publicity of the application were as follows:

No of individual responses: 5      Objecting: 0      Supporting: 5

7.2 They commented as follows:

- Support for provision of 112 affordable homes in area where there is huge demand;
- The restricted eligibility may help people into home ownership
- Housing is expensive in area which makes it difficult for local people to stay in the community

- First time buyers, ineligible for social housing suffer from unaffordable private housing sector are not heard in planning process
- Important to provide homes for people on moderate incomes to enable people to stay in the borough

## **8 RELEVANT PLANNING POLICIES AND GUIDANCE**

8.1 In determining any planning application, the Council is required to have regard to the provisions of its Development Plan 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: Strategic Policies 2013 (CLP1), the Croydon Replacement Unitary Development Plan 2006 Saved Policies 2013 (UDP) and the South London Waste Plan 2012.

8.2 Government Guidance is contained in the National Planning Policy Framework (NPPF), issued in March 2012. 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:

- Promoting sustainable transport;
- Delivering a wide choice of high quality homes;
- Requiring good design.

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

### 8.4 Consolidated London Plan 2015 (LP):

- 3.3 Increasing housing supply
- 3.4 Optimising housing potential
- 3.5 Quality and design of housing developments
- 3.7 Large residential developments
- 3.8 Housing choice
- 3.9 Mixed and balanced communities
- 3.10 Definition of affordable housing
- 3.12 Negotiating affordable housing
- 3.13 Affordable Housing thresholds
- 3.16 Protection and enhancement of social infrastructure
- 5.2 Minimising carbon dioxide emissions
- 5.3 Sustainable design and construction
- 5.5 Decentralised Energy Networks
- 5.6 Decentralised energy in development proposals
- 5.7 Renewable energy
- 5.9 Overheating and cooling
- 5.10 Urban greening
- 5.11 Green roofs and development site environs
- 5.13 Sustainable drainage
- 5.15 Water use and supplies

- 5.21 Contaminated land
- 6.3 Effects of development on transport capacity
- 6.9 Cycling
- 6.10 Walking
- 6.11 Smoothing traffic flow and tackling congestion
- 6.12 Road Network Capacity
- 6.13 Parking
- 7.1 Lifetime neighbourhoods
- 7.2 An inclusive environment
- 7.3 Designing out crime
- 7.4 Local character
- 7.5 Public realm
- 7.6 Architecture
- 7.7 Tall and large buildings
- 7.8 Heritage assets
- 7.14 Improving Air Quality
- 7.15 Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes
- 7.21 Trees and Woodland
- 8.2 Planning obligations
- 8.3 Community infrastructure levy

Croydon Local Plan: Strategic Policies 2013 (CLP1):

- SP1.1 Sustainable Development
- SP2.1 Homes
- SP2.2 Quantities and Locations
- SP2.3 Affordable Homes - Tenure
- SP2.4 Affordable Homes - Quantum
- SP2.5 Mix of homes by size
- SP2.6 Quality and Standard
- SP3.1 Employment
- SP3.2 Innovation, Investment & Enterprise
- SP4.1-4.3 Urban Design and Local Character
- SP4.5-4.6 Tall buildings
- SP4.7-4.10 Public Realm
- SP4.13 Character, Conservation and Heritage
- SP6.1 Environment and Climate Change
- SP6.2 Energy and CO2 Reduction
- SP6.3 Sustainable Design and Construction
- SP7.4 Enhance biodiversity
- SP8.3-8.4 Development and Accessibility
- SP8.6 Sustainable Travel Choice
- SP8.7(h) Cycle Parking
- SP8.13 Motor Vehicle Transportation
- SP8.15-16 Parking

Croydon Replacement Unitary Development Plan 2006 Saved Policies 2013 (UDP):

- UD1 High Quality and Sustainable Design

- UD2      Layout and siting of new development
- UD3      Scale and Design of new buildings
- UD6      Safety and Security and New Development
- UD7      New Development and Access for All
- UD8      Protecting residential amenity
- UD13     Parking Design and Layout
- UD14     Landscaping
- UD15     Refuse and Recycling Storage
- UD16     Public Art
- NC4      Woodland, Trees and Hedgerows
- EP1 - EP3   Pollution
- EP5 - EP7   Water - Flooding, Drainage and Conservation
- T2        Traffic Generation from Development
- T4        Cycling
- T8        Parking
- H2        Supply of new housing
- H3        Housing Sites
- H4        Dwelling mix on large sites

There is relevant Supplementary Planning Guidance as follows:

- London Housing SPG March 2016
- Play and Informal Recreation SPG
- Accessible London: Achieving an Inclusive Environment SPG
- Sustainable Design and Construction SPG
- Draft SPG - Affordable Housing & Viability (November 2016)
- Croydon Opportunity Area Planning Framework (adopted by the Mayor and Croydon)
- East Croydon Masterplan
- SPG Note 3 – Designing for Community Safety
- SPG Note 10 – Designing for Accessibility
- SPG Note 12 – Landscape Design
- SPG Note 15 – Renewable Energy
- SPG Note 17 – Sustainable Surface Water Drainage
- SPG Note 18 – Sustainable Water Usage

8.5 The Partial Review of Croydon Local Plan: Strategic Policies (CLP1.1) and the Croydon Local Plan: Detailed Policies and Proposals (CLP2) have been approved by Full Council on 5 December 2016 and was submitted to the Planning Inspectorate on behalf of the Secretary of State on 3 February 2017. Policies which have not been objected to can be given some weight in the decision making process. However at this stage in the process no policies are considered to outweigh the adopted policies listed here to the extent that they would lead to a different recommendation.

## **9 MATERIAL PLANNING CONSIDERATIONS**

9.1 The main planning issues raised by the development that the committee should be aware of are:

1. Principle of the proposed development

2. Acceptability of proposed housing typology
3. Townscape and design
4. The impact on adjacent occupiers
5. The acceptability of the living conditions provided for future occupiers
6. The impact on highway and parking conditions in the locality
7. The environmental impact and sustainability of the development
8. Other planning matters

### **Principle of the proposed development**

- 9.2 The site is located within the Croydon Opportunity Area and Croydon Metropolitan Town Centre. The recent permission accepted the principle of the loss of educational use and office use on the site. It referred to an earlier study undertaken in 2015 with regards to the educational use which confirmed that there was no need for continued community related use of the site and there were no policy objections to the loss of existing offices. Whilst the previous scheme provided a commercial space at ground floor, this was only to be a small unit and was not complete replacement for the community and office space lost through demolition. The applicants have indicated that there is no market for a commercial unit at this location given the site's positioning away from the main arterial pedestrian routes to the station.
- 9.3 The proposed development is considered well designed to ensure that the ground floor provides an active frontage to Addiscombe Grove without the need of a commercial unit. The front will be glazed at ground floor with views through to a resident's lounge and a large open space for mixed use and cycle workshop.
- 9.4 A residential scheme on this town centre site is supported in general policy terms and should significantly contribute to meeting the borough's strategic housing targets and the overall town centre growth agenda.

### **Acceptability of Proposed Housing typology**

#### Housing Mix

- 9.5 The council seeks to secure the provision of family housing and has an aspiration for 20% of all new homes within the Croydon Opportunity Area to have three or more bedrooms. This site is located within the 'New Town and East Croydon' area where a minimum of 10% is sought.
- 9.6 The building would accommodate 73.2%, 25.5%, 1.3% of 1bed, 2bed and 3bed units respectively. This would not be policy compliant. However, 73% of the proposed units would be discounted market flats (affordable housing).
- 9.7 It is noted that the extant permission for this site was also not fully policy compliant providing 6.7% 3 bedroom units. In addition the extant permission provided significantly less affordable units than the proposed scheme.
- 9.8 The Applicant was asked to provide a viability appraisal to consider whether a policy compliant scheme in terms of mix would be viable. After exchange of information which was reviewed by independent viability consultant, it was confirmed that a policy complaint scheme would not be viable. It is accepted that in order to provide a high level of 1bed Pocket units (affordable units) the scheme cannot achieve a significant



number of 2 and 3 bedroom flats. Given the specific provider for this development, the site's location on a constrained urban site and the high level of affordable housing proposed, it is considered that the housing mix would be acceptable in this instance.

Affordable Housing

9.9 Given the anticipated forthcoming changes to policy in terms of affordable housing a brief comparison table of current and post adoption requirements within this area is useful and as follows:

<b>Current Policy Affordable housing</b>	<b>Post-adoption Local Plan Policy Affordable housing</b>
<p>Affordable: 50% on-site subject to viability (60:40 split between affordable rent and intermediate products unless we have agreement from a Registered Provider that this split is not practical in this location).</p> <p>Any provision less than 50% must be justified by a viability report which will be independently assessed at the cost of the applicant. There is a minimum requirement of 10% on site with the remainder up to 50% being provided either on a donor site, via a commuted sum, or through a review mechanism (in that order of preference).</p>	<p>Affordable: 50% on-site subject to viability (60:40 split between affordable rent and intermediate products unless we have agreement from a Registered Provider that this split is not practical in this location).</p> <p>Any provision less than 50% must be justified by a viability report which will be independently assessed at the cost of the applicant. There is a minimum requirement of affordable housing to be provided either as:</p> <p>30% affordable housing on the same site as the proposed development; or</p> <p>15% affordable housing on the same site as the proposed development if the site is in the Croydon Opportunity Area, plus the equivalent of 15% affordable housing on a donor site provided 30% on-site provision is not viable and the donor site is located within either the Croydon Opportunity Area or one of the neighbouring Places of Addiscombe, Broad Green &amp; Selhurst, South Croydon or Waddon; or</p> <p>15% affordable housing on the same site as the proposed development plus a Review Mechanism entered into for the remaining affordable housing (up to the equivalent of 50% overall provision through a commuted sum based on a review of actual sales values and build costs of completed units) provided 30% on-site provision is not viable, construction</p>

	<p>costs are not in the upper quartile<sup>1</sup> and there is no suitable donor site.</p> <p>Less than 15% - application will be refused.</p>
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9.10 The scheme provides 73% affordable units all of which would be discounted market housing flats. All of the 1 bedroom flats would be 'Pocket Living' units. Pocket Living units are for sale properties at a cost below market level. They would be subject to the following restrictions:

- Restricted Eligibility – Eligibility would be restricted by a maximum income level of £90,000 (GLA's Affordable housing income threshold); restricted to workers or residents of London Borough of Croydon and first time buyers.
- Provisions to Retain Properties at Affordable Price – the lease of Pocket Living units would include conditions to ensure that owners follow the same eligibility rules when selling their homes and this would be secured in a legal agreement (s106).
- Cost Below Open-Market Levels – The Pocket Living units would be sold at a minimum discount of 20% to open market value. The pricing would be agreed through the use of RICS Red Book valuations and this would be secured through s106

9.11 The NPPF defines affordable housing as 'social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provision to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision'. The NPPF goes on to define intermediate housing as 'homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the affordable housing definition...These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent but not affordable rented housing'. The proposed Pocket Living units would meet the definition as set out within the NPPF as an intermediate housing product which would be sold below market values and would be restricted to eligible persons living and working within the borough.

9.12 The scheme would therefore provide more than 50% affordable housing, but it would not be a policy compliant mix as the affordable housing would all be an intermediate product and no social or affordable rented properties would be provided. The previous scheme on the site (though of a much smaller scale), made provision for 17.8% on site affordable housing at a ratio of 60:40 in favour of affordable rent and it is felt that the significant increase in affordable housing in this scheme is beneficial to providing affordable housing in the borough.

9.13 A viability appraisal confirmed that a policy compliant scheme with compliant housing mix and 50% affordable housing with 60:40 split (affordable rent to intermediate

products) would not be viable and this has been appraised by an independent Consultant. With 112 affordable units, the planning application scheme would represent a significant level of affordable housing but it is also important to ensure that the units would be affordable to local residents.

- 9.14 At pre-application stage the applicant provided evidence which suggested that 1,590 people are eligible for Pocket Units in Croydon and 69 eligible people have already registered an interest in the current site. The average salary of other Pocket residents in London is £42,000 which is above the average salary for Croydon at £33,000. The applicant has sought to demonstrate that despite the high residential values of the site, the units would be affordable to local residents.
- 9.15 The GLA determines that in order to be affordable, occupiers should not spend more than 40% of their net income on housing (including service charge etc). The Independent Viability Consultants prepared a table which sets out the income spent. They made assumptions as to the purchase price (£275,000 with 20% discount); Help to Buy scheme assumed; interest rates of 2.7%, Mortgage term of 30 years and service charge of £120/month included. This is set out in Table 1:

Deposit	Monthly Payment	Service charge per month	Total per month	Total per annum
5%	786	120	906	10,872
10%	730	120	850	10,200
15%	675	120	795	9,540
20%	619	120	739	8,868

Table 1

- 9.16 This table confirms that with Help to Buy, the proposed flats would be affordable to local residents on an average salary of £33,000 with a deposit of 15% (the net pay is £24,315, and 40% of this is £9,726). Without Help to Buy, the flats would be affordable to those with a larger deposit or higher salary of over £41,000.
- 9.17 It would be preferable that the flats would be more affordable. However, it is clear from the Independent Viability Consultants report that it would be highly challenging for the Applicant to improve affordability by reducing the level of discount below 20% as this would further reduce their profit which at 10.98% is significantly below the usual 20% developer profit on costs target.
- 9.18 It is important to ensure, through s106 clauses, that the valuation of the Pocket Living units is based upon a hypothetical situation in which these units are sold at full market value to ensure that they truly reflect a 20% discount from full market value. A valuation should take place at the time of sale to determine the market value of the Pocket units and this would be agreed through the use of RICS Red Book valuations secured through 106.
- 9.19 The applicant has also agreed to limit marketing of the flats to restrict the eligibility of the flats for the first three months to a maximum salary of £60,000. In addition review mechanisms would be required to capture any uplift in viability.

#### Density of Development

- 9.20 The site is within a central location with excellent public transport accessibility and should be able to accommodate between 650–1100 hr/ha habitable rooms per hectare

(hrph) and up to 405 units per hectare. The guidance states that it is not appropriate to apply the density matrix mechanistically. The density of the proposed scheme is significantly above the ranges within the London Plan matrix table, but the site is located within the Metropolitan Centre and has excellent public transport accessibility. The London Plan and Housing SPG state that residential densities should be optimised in appropriate area. The proposed density is considered acceptable in the area subject to suitable living conditions for future occupants being achieved.

### **Townscape and Design**

- 9.21 The proposed design is considered to be an appropriate scale and massing for the location and context. It is suitably subservient to No.1 Croydon, would appear in keeping with the character of the surrounding character and other towers approved in the vicinity of No.1 Croydon and East Croydon station.
- 9.22 At pre-application stage concerns were raised with regards to the ground floor layout and north facing single aspect units, it was also felt that the amenity space provision required further development to ensure that it provides high quality amenity space for occupiers. Whilst improvements were made to the scheme at application stage, the GLA raised concerns with the number of north facing single aspect units, number of flats per core to the lower levels and ground floor layout. Amendments have been provided significantly improving the ground floor layout, reducing the number of north facing units and providing more details of the amenity spaces.

### Massing and Height

- 9.23 The site sits within the 'Edge Area' boundary in the OAPF, though to the east of the site, the context is more suburban/low-rise. A tower is considered acceptable given the context of the Opportunity Area and the site's proximity to East Croydon station and bus and tramline.
- 9.24 A study of the surrounding context has been undertaken as part of the design and access statement and several key views of the proposed development have been provided. It is considered that these demonstrate that tower demonstrates sufficient subservience to no.1 Croydon which is a locally listed building and landmark and that the height and that of the lower plinth would not appear out of keeping with the surrounding context despite the lower density development to the east and south of the site.
- 9.25 The development would form a significantly lower mass to the majority of the site, with the tower contained towards the western end of the site. This is supported as it promotes a clean plinth and tower diagram. The lower mass of the proposed building would represent a small increase in height from the extant permission but would be built tighter to the southern boundary. The simplicity of the southern elevation is supported. The articulation of the façade helps to break down the scale of the elevation and provide interest to the long elevations.

### Layout

- 9.26 The proposed layout at ground floor would provide communal space in the form of a residents' lounge, cycle workshop, circulation space and cycle storage. Previously concerns were raised that the layout at ground floor resulted in the amenity space

appearing squeezed and insufficient for the number of proposed occupiers and a basement was recommended for cycle storage and plant equipment. The applicant has advised that a basement would not be viable. However, improvements have been made in response to officer's comments and the GLA's stage 1 responses. This has included increasing the size and improving the details of the lounge area and pushing the cycle storage back from the front of the building to provide a significantly enlarged shared internal amenity space the entire width of the building.

- 9.27 The use and layout of the ground floor is important to ensure that the building does not present a non-active frontage to the street scene. The amenity space now spans the entire width of the building frontage and allows some active frontage to the sides of the building also. The front and sides abutting the amenity spaces would be clear floor to ceiling glazing and it is therefore important to ensure the layout and design gives the sense of activity when viewed from the street scene whilst maintaining some privacy for the a lounge area. The provision of columns break up the glazing which is pulled back slightly from the frontage and the layout would afford some privacy for resident's using the space without leaving an under active frontage to the street scene. Further details are considered necessary to ensure that this space would be of high quality. A strategy for the use of this space and details the internal layout of any walls, divisions, privacy screens and podium spaces would be secured by condition.
- 9.28 At pre-application stage, further details were requested as to the layout and use of the shared amenity spaces (internal and external). Further information has been provided which provides an indication of the level of hard and soft landscaping. A wind microclimate analysis has confirmed that the external amenity spaces would provide useable spaces for occupants with mitigation measures such as balustrades, screens and soft planting. Further detail is required to ensure that the amenity spaces are all landscaped to a high quality, with sufficient soft landscaping and spaces for future resident's to use and suitable mitigation for wind conditions are provided. These can be secured by condition and should be implemented prior to first occupation of the flats and maintained for the lifetime of the development. This will ensure that there is high quality amenity space available for future occupants of the site.
- 9.29 The number of north facing single aspect units was raised as a concern at pre-application stage. The number of these units was reduced through the pre-application process but was raised again as a concern by the GLA in their stage 1 response as the development fails to meet policy requirements. At the time of submission, 32 flats were north facing single aspect units. A daylight sunlight report suggested that despite this, all of the flats would receive adequate levels of daylight. However it was still felt that the layout needed to be improved as the 1st-8th floors all had four north facing single aspect units. Amendments to the scheme proposed notches in the building to introduce corner windows to improve the outlook and daylight to half of these flats. The resulting layout has reduced the number of single aspect units to no more than 10.4% (16 flats). This is a significant improvement and does not detract from the design of the building. The improved layout is considered acceptable.

#### Façade/Detailed Design

- 9.30 The design approach seeks to reflect the post-war architecture of Croydon focussing on having singular key or strong architectural moves within a building.

The move to use a textured tile is very positive; this will aid in breaking down the mass of the building to a human scale and reflects the context of the locally listed building, No.1 Croydon.

- 9.31 The articulation of the southern elevation is important to break down the massing of this prominent elevation. Samples of materials have been submitted and the application drawings have been updated to reflect agreed materials. The main façade treatment would be a mix of white and grey glazed tiles which would reflect the character of the nearby Locally Listed building (No.1 Croydon). The elevations would be broken up with horizontal bands in light grey GRC (glassfibre reinforced concrete). The metal work, including entrance, windows, balconies and pavilions, would stand out as medium bronze aluminium which adds distinctiveness to the design.
- 9.32 At ground floor the materiality ensures that the front and sides of the building would provide an active frontage, with the entrance highlighted by the use of bronze framing and double height glazing to the front elevation. To the sides and rear a ribbed concrete treatment, medium bronze aluminium and translucent Reglit would add texture and variation to the elevations. The Reglit would provide a sense of activity when viewed from the street scene whilst protecting the privacy of the cycle store.
- 9.33 It is considered that the materials provide an appropriate response to the context and area and would represent a high quality design. Details of materials are listed on the main elevation drawings and would be secured by condition together with the submission of further detailed drawings and details and the scheme architects would be retained through s106 agreement to ensure that the quality of the design is secured.

#### **The impact on adjacent occupiers**

- 9.34 To the north of the application site, the neighbouring properties are a hotel building (Alico House – Easy Hotel) and office building (Go-Ahead House). The distance between windows in these buildings and the application site is between 14-18m. This is considered acceptable and there would be no habitable rooms effected.
- 9.35 Towards the rear of the site, the development site at 30-38 Addiscombe Road has permission for a 5-6 storey residential development. Whilst this development is not yet built, it is important to ensure that the future amenity of residents would not be unduly compromised. The scheme has several flats which would overlook the rear part of the proposed development and would be separated by about 14m. The proposed flats at no.30-38 Addiscombe Road would have tall privacy screening to balconies overlooking the application site to protect the amenity of both their occupiers and those of the application site.
- 9.36 The Vertical Sky Component (VSC) assessment of daylight to existing nearby residential properties highlighted confirms that 70% of the windows tested meet or surpass the standard BRE Vertical Sky Component (VSC) target. Alternative tests confirm that this figure rises to 86% for Daylight Diffusion tests which ensure that 80% (or 0.8 times the previous daylight amenity) is retained for each habitable room. The tests confirm that the transgressions are limited to bedrooms facing the application site. The report also suggest that 90% of flats would comply with Average Daylight Factor tests and 75% of the south facing flats would also meet

BRE guidelines for sunlight (for Annual Probable Sunlight Hours). The direct sunlight hours targets stated in the BRE guide are only intended to be applied to main living room windows. Where shortfalls exist, these are largely to bedroom windows and only three appear to be to living room/dining rooms. It should also be noted that the majority of transgressions occur to the rooms and windows directly overlooking the application site where the baseline VSC and sunlight are already restricted due to the extant permission at the application site and several windows will be obstructed by balconies and privacy screens. The BRE guidance acknowledges that existing windows with balconies above them typically receive less daylight as the balcony cuts out light from the top part of the sky and that even a modest obstruction opposite may result in a large relative impact on the VSC. In these circumstances it is impractical to avoid transgression of the BRE numerical targets. Given the layout and proximity of these flats to the boundary of the site, it is considered that the level of compliance is consistent with and appropriate with this urban location and surrounding context of the town centre.

- 9.37 To the north east of the site along Park Hill Road, Park Hill Mansions and St Nicholas House are both 4 storey residential blocks that have windows overlooking the site. The Vertical Sky Component (VSC) and Annual Probable Sunlight Hours (APSH) have been tested for the habitable rooms facing the application site for both buildings. These would all fully comply with the BRE guidelines and it is not considered that the development would harm the living conditions of these flats.
- 9.38 To the east of the site, no 36 Garrick Crescent is a two storey house. This is the closest house on Garrick Crescent and the only one which was considered at risk of loss of daylight or sunlight. The orientation of this house means that it would have a limited oblique view of the proposal from the rear windows of the house. VSC analysis confirmed that the windows would maintain full compliance with the BRE guidelines and the development would not result harm to the daylight of this property. Given that the windows overlooking the site are orientated to a northerly direction, the development would not have any impact upon sunlight.
- 9.39 To the south the single aspect units would have an outlook onto the neighbouring church site. This site is in community use and therefore the overlooking windows would not give rise to any overlooking issues currently. However, it is important to ensure that the development would not prejudice the development potential of this neighbouring site in the future. The applicant has provided an outline indicative scheme for the church site which suggests that development on this neighbouring site could be undertaken without being significantly compromised despite the overlooking windows. Though it should be noted that given the units overlook this neighbouring site, any development of the church site may result in some loss of daylight and sunlight to the proposed flats.
- 9.40 Although separated by the church site, there is further residential development to the south of the site which could be effected by the proposed development. 22 Addiscombe Grove is a four storey building with flats at each level. The property is orientated east to west and full VSC and APSH tests have been undertaken which confirm that the flats would meet BRE guidelines and would not result in significant loss of daylight or sunlight to these flats.
- 9.41 To the west of the site on the opposite side of the road, the three storey block of flats at Carnoustie Court (17 Addiscombe Grove) and beyond that the three storey block flats at 1- 57 Harrington Court, Altyre Road have been assessed. The

windows are not south facing and therefore sunlight has not been assessed. The majority of flats at Harrington Court would maintain suitable daylight (VSC), with only 4 habitable room windows falling short. Those which fall short would just fall short of standards and it is considered that the daylight would not result in significant harm to the living conditions of these flats. For Carnoustie Court, 9 of the habitable room windows facing the site would fall short of full BRE compliance for retained daylight. However, where transgressions occur, it does not automatically follow that daylight will be adversely affected. None of the flats would have less than 0.72 times the previous daylight and the majority of rooms effected would be bedrooms. It is considered that the reduction in light would be limited. Accordingly, while there would be some loss of daylight and sunlight to surrounding residential properties this needs to be seen in the urban context of the site and its surroundings.

- 9.42 The BRE guidance states “In a historic city centre, or in an area with modern high rise buildings, a higher degree of obstruction may be unavoidable if new developments are to match the height and proportions of existing buildings.’ Furthermore, the London Plan Housing Supplementary Planning Guidance 2015 states that ‘An appropriate degree of flexibility needs to be applied when using BRE guidelines to assess the daylight and sunlight impacts of new development on surrounding properties, as well as within new developments themselves. Guidelines should be applied sensitively to higher density development, especially in opportunity areas, town centres, large sites and accessible locations, where BRE advice suggests considering the use of alternative targets. This should take into account local circumstances; the need to optimise housing capacity; and scope for the character and form of an area to change over time’. The distances between the proposed building and surrounding buildings, as cited above, would be acceptable within the urban context of the site and would not result in adverse loss of light to adjacent or nearby residential occupiers. In this case, the loss of light to surrounding residential property with reference to the BRE guidelines and London Plan Housing Supplementary Planning Guidance 2015, would not be so adverse as to warrant a reason for refusal.

#### **The acceptability of the living conditions provided for future occupier**

- 9.43 The Technical Housing Standards – Nationally Described Space Standard provides minimum floor area specifications for all new dwellings. The development has been designed to meet these standards in terms of overall internal floorspace for flats, bedroom sizes, good circulation and storage. All flats would have good floor to ceiling heights and floor to ceiling windows. The scheme would also provide 10% of units as wheelchair user accessible/easily adaptable in line with policy which is supported.
- 9.44 The London Housing Supplementary Planning Guidance (SPG) provides minimum standards which should be met with regards to amenity space. The Market units (2b and 3b units) would all have private balconies and are being designed to meet these standards. The Pocket Living units would not have private amenity space (minimum standards require 5sqm balconies) which would be contrary to policy.
- 9.45 However, the scheme proposed a variety of indoor and outdoor shared amenity spaces which would be accessible for all residents. Together, the internal and external amenity space would provide in excess of the required quantity of amenity space in lieu of private amenity space. A wind microclimate study confirms that the



external spaces would be suitably sheltered to provide useable spaces for sitting and strolling with appropriate wind mitigation.

- 9.46 The proposed layout would result in 66 single aspect units (43% of total units) of which 16 would be north facing. The layout within floors 1-8 aims to maximise the number of Pocket Living units which can be accommodated within the site but it results in 12 units per core which exceeds the London Plan guidance for 8 flats per core. Despite this, the circulation and core is well designed, with light from both ends of the corridor. As set out above, the number of north facing and south facing single aspect units has been reduced through pre-application discussions and during the course of the application in response to the GLA stage 1 comments.
- 9.47 Through discussions with officers the applicant has explored the potential of providing a second core however due to the linear nature of this site, a second core could only be provided to the rear of the site and would need to be accessed off the shared service road which would not be ideal. It is most likely that people would enter from the front of the site through the shared communal space which it is important to activate.
- 9.48 The outlook for the north facing single aspect units would be constrained with a minimum distance of 14m to neighbouring properties. Given the orientation, there was concern at pre-application stage that they would receive limited daylight especially at the lower floors. The submitted daylight sunlight report confirms that the north facing single aspect units would have suitable daylight within the flats due to their limited depth, high quality design and floor to ceiling windows. 96% rooms would meet ADF target values and 93% would additionally have good quality daylight distribution in line with BRE guidelines. This is considered to be a high level of compliance given the constraints of the site and its urban context. 59% of all rooms within the development (including north facing rooms) would have a good degree of sunlight. However, it should be noted that sunlight factor tests do not normally apply to north facing rooms and the compliance figure rises to 97% when omitting north facing windows. Again this is considered to be a high level of compliance with the BRE guidance.
- 9.49 The standard of accommodation for future occupiers is considered acceptable.

#### **The impact on highway and parking conditions in the locality**

- 9.50 The site is located in an excellent location with the highest PTAL of 6b, being located in close proximity to the East Croydon transport Interchange and within the Croydon Metropolitan Town Centre. The proposed scheme would be car free except for 4 disabled parking spaces to the ground floor of the building (2.6%).
- 9.51 Given the extremely good accessibility, the site affords itself to a car free development subject to provision of disabled and cycle parking. The application is supported by a Transport Assessment, which includes a Travel Plan, Delivery and Servicing Plan, and Demolition and Construction Logistics Plan. Provision will be made for 4 disabled parking spaces. Given the constraints of the site is considered acceptable.
- 9.52 50% of disabled parking bays should have an EVCP installed, since Motability users are early adopters of electric and plug-in hybrid vehicles. The remaining bays

- should have passive provision. It is considered that this could be secured by condition.
- 9.53 Cycle storage is proposed for 197 cycles in a storage area within the ground floor of the building and an additional 4 spaces are provided for visitor parking adjacent to the pedestrian access. This exceeds the London Plan standards and is therefore acceptable. The layout of the proposed internal cycle storage space has been improved and would be accessible from the front and northern side of the building. The cycle stands would provide three tier stands, the details of these would be secured by condition together with further details to ensure that the layout the stands would allow further security (such as cages) within the storage space. 4 visitor spaces would be provided to the front of the building. The details of these would be secured by condition.
- 9.54 The Transport assessment includes a parking beat survey, which indicates that there is some limited capacity for some on-street parking in the area. However the site is within a controlled parking zone and future occupiers should be restricted from applying for on-street parking permits. This is referred to in the Travel Plan and should be secured by s106.
- 9.55 The Travel Plan also identifies the availability of Car Club vehicles in the area. The applicant has committed to funding membership of a carplusUK approved car club for residents for 3 year. This is to be offered in the marketing material for the site, available from first residential occupation of the site and to subsequent occupants of any given unit during the three year period. As ever, the lack of car club provision on site is a problem and the car club vehicles identified in the transport assessment are not very close physically to the site. Three year membership will assist in providing a bay on Altyre Road or Hazledean Road or other location nearer this site. A contribution is requested to cover the costs of two car club spaces including public EVCP, plus loss of income to be agreed with Parking Services. This contribution would be secured through s106.
- 9.56 Overall the Travel Plan attempts to encourage a continued shift towards more active travel, having established the site as being suitable for a car free development. The targets for increasing walking and cycling are good, and realistic. The Travel Plan would be secured through s106.
- 9.57 Refuse storage is located adjacent to the access road and it has been demonstrated in the submitted Transport assessment that both refuse and delivery vehicles are able to turn on-site so as to enter and leave in a forward gear. The bin stores and access to them should be completed prior to first occupation of the proposed flats and this would be secured by condition.
- 9.58 The Demolition/Construction Logistics Plan is considered acceptable as a framework document and a full DCLP should be secured by condition and an informative added that the applicant should consult the Network Management team on matters affecting the public highway at least 3 months prior to the commencement of works on site. It is noted that peak hour deliveries will not take place, which is welcomed.
- 9.59 In addition to the above, TfL have commented on the application and requested further information with regards to trip generation and pedestrian surveys as well as minor amendments to several of the submitted documents. It is considered that the

final versions of these documents can be secured by condition or secured through s106 clauses.

- 9.60 TfL have also requested a contribution towards the DIFS fund which will be based on the updated trip generation. Details have been sent to TfL to address their comments and their further feedback is awaited.

### **Impact on Trees**

- 9.61 Trees of value should be retained and where loss is unavoidable, they should be replaced with high quality trees in the correct location. Moreover, the loss of trees of value should only be accepted where a development will bring significant regenerative benefits.
- 9.62 As with the extant permission, the existing trees alongside the Addiscombe Grove road frontage would be removed as part of the proposals. However these are not protected and are not of a quality to warrant a tree protection order.
- 9.63 There is limited opportunity to provide new landscaping at ground level, though some planting is proposed to the front of the building. These will improve the quality of the street scene and provide wind mitigation. Improvements are also proposed to the public realm to the front and side of the building (the pavement along Addiscombe Grove to the front of the building and the access road to the side of the building). Along Addiscombe Grove the public realm landscaping is expected to meet the requirements of the Public Realm Design Guide. The improvements to the public realm would be secured through s106 agreement and condition.
- 9.64 Further soft landscaping will also be provided to the roof terraces, with a variety of soft and hard landscaping providing different types of spaces for occupants to use. The details for trees planting and landscaping will be controlled through the use of planning conditions.

### **The environmental impact and sustainability of the development**

#### *Energy*

- 9.65 New development should make the fullest contribution to minimising carbon dioxide emissions and should incorporate on site renewable energy generation. Zero carbon is sought for the 2016-2031 period. A detailed Energy and Sustainability Strategy report has been submitted which confirms that the development has been designed in accordance with the London Plan hierarchy – ‘Be Lean, Be Clean, Be Green’ to maximise the reduction of carbon dioxide emissions of the development. Passive design measures and energy efficient equipment have been incorporated into the design together with the efficient supply of energy and incorporation of renewable technology. Altogether the report suggests that the development could provide a 49% reduction in carbon dioxide emissions on site which exceeds the 35% policy requirement. A contribution will be secured through s106 to offset the remaining carbon emissions to meet the Zero Carbon standard. The development has also been designed to ensure that it could connect to a future district network serving the town centre. Overall, the proposals are considered acceptable subject to provision of offset contribution secured through s106 agreement and a condition ensuring that the development is built in accordance with the Energy and Sustainability Strategy Report.

### *Overheating*

- 9.66 An overheating assessment has been undertaken specifically to consider the south facing single aspect units which could be at risk of overheating. Whilst the analysis suggests that the proposed flats could be at risk of some overheating, mitigation measures are proposed in the form of glazing, blinds and potential cooling/heating systems. It is recommended that the development is in accordance with the recommendations set out in the Energy and Sustainability Strategy Report.

### *Air quality*

- 9.67 The site lies within the Air Quality Management Area declared by the London Borough of Croydon. An air quality assessment has been submitted which confirms that the impacts of operational impacts due to emissions would be negligible and the impact of the development on the local air quality is judged to be insignificant. The impacts of local traffic on the air quality for residents living in the proposed development would be acceptable. The report concludes that the construction phase will have the potential to create dust and it will be necessary to implement mitigation measures to minimise dust emissions. However, with mitigation in place it does not expect residential effects to be significant. It is recommended that the development be built in accordance with the Air Quality Assessment and this would be secured by condition.
- 9.68 Due to the increasing relative contribution of non road transport sources of emissions of air pollution to breaches of the air quality objectives and the exposure reduction target, the development should play a greater role in improving air quality. In order to contribute towards improved air quality in the local area, it is proposed that a s106 contribution will be secured towards an air quality fund which funds actions in Croydon's AQAP or provision of some form of mitigation on site (to be confirmed by the Pollution Team) such as putting into operation a Low Emissions Strategy for the site.

### *Noise*

- 9.69 An acoustic report has been submitted which demonstrates that the site is suitable for the proposed residential development subject to the installation of mitigation measures to the façade in the form of glazing and attenuated ventilation which should be maintained and retained for the life of the development. The report sets out recommendations for the appropriate level of glazing. It confirms that whilst some of the balcony areas on the north-west corner would have noise levels higher than recommendations for amenity spaces according to the World Health Organisation, the shared amenity space would have appropriate noise conditions. The acoustic environment and mitigation measures are considered acceptable subject to conditions that the development should be built in accordance with the Acoustic report and for the submission of details plant noise.

### *Wind mitigation*

- 9.70 A wind microclimate assessment has been submitted which concludes that the scale of the development should not have a significant effect on the immediate locality. It states that all thoroughfares and entrances to the proposed development are suitable for the intended use during the windiest seasons and do not require mitigation measures. It suggests that whilst several locations would have conditions

slightly windier than desired during the windiest environments, mitigation measures could be provided in the form of suitable planting such as to the front of the site. The report also concludes that the proposed amenity spaces, including shared terraces and balconies would provide suitable wind environments for their intended use with mitigation measures including balustrades, screens and soft landscaping including shrub and small tree planting. This approach is considered acceptable and the details of the mitigation measures can be incorporated as part of the detailed design and secured through condition.

#### *External lighting*

- 9.71 Details of external lighting have not been provided, however it is considered that lighting to the shared access road, front elevation and roof terraces is not considered likely to have a significant impact upon the surrounding environment. The details of any external lighting should be secured by condition to ensure that they would not harm the living conditions of neighbours or occupants of the proposed scheme.

#### **Other Planning Matters**

- 9.72 Consideration will need to be given as to the requirement for any planning obligations required to mitigate the impact of the development.