

PART 6: Planning Applications for Decision

Item 6.2

1 APPLICATION DETAILS

Ref: 22/00638/FUL
 Location: Hotel, 22 St Peter's Road, Croydon, CR0 1HD
 Ward: South Croydon
 Description: Conversion of existing hotel to 6no. residential units including internal reconfiguration and external alterations and changes to boundary treatment, and construction of a detached three storey dwellinghouse on the site, facing Aberdeen Road.
 Drawing Nos: 20E PL LOC 01, 20E PL EXT 01, 20E PL EXT 02, 20E PL EXT 03, 20E PL EXT 04, 20E PL EXT 05, 20E PL EXT 06, 20E PL EXT 07, 20E PL EXT 08, 206 PL PRO 101 rev B, 206 PL PRO 102, 206 PL PRO 103 rev A, 206 PL PRO 104 rev B, 20E PL 105, 206 PL PRO 106, 206 PL PRO 107, 206 PL PRO 108, 206 PL PRO 109 rev B, 206 PL PRO 110 and 206 PL PRO 111.
 Applicant: Nirmal Binning
 Agent: Oliver Lazarus
 Case Officer: Jeni Cowan

| Housing Mix | | | | | | |
|---|----------------------------|----------------------------|----------------------------|----------------------------|----------------------------|--------------|
| | 1 bed (1 person) | 1 bed (2 person) | 2 bed (3 person) | 2 bed (4 person) | 3 bed (5 person) | TOTAL |
| Existing | | | | | | 0 |
| Proposed (all market housing) | 3 | 1 | | | 3 | 7 |
| TOTAL | | | | | | 7 |

| Vehicle and Cycle Parking (London Plan Standards) | |
|--|-----------------|
| PTAL: 5 | |
| Car Parking maximum standard | Proposed |
| Car free | 0 |
| Long Stay Cycle Storage minimum | Proposed |
| 10.5 (rounded up to 11) | 15 |
| Short Stay Cycle Storage minimum | Proposed |
| 2 | 0 |

1.1 This application is being reported to committee because:

- The ward councillor (Cllr Michael Neal) made representations in accordance with the Committee Consideration Criteria and requested committee consideration.

2 RECOMMENDATION

2.1 That the Committee resolve to GRANT planning permission.

- 2.2 That the Director of Planning Sustainable Regeneration is delegated authority to issue the planning permission subject to:

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

- a) Sustainable transport contribution of £10,500
- b) Membership of car club for each unit for a minimum period of 3 years
- c) Removal of car parking permits for any future occupier
- d) Removal of dropped kerb (through Section 278 Agreement)
- e) Monitoring fees associated with the above
- f) Any other planning obligation(s) considered necessary by the Director of Planning and Sustainable Regeneration

- 2.3 That the Director of Planning and Sustainable Regeneration is delegated authority to negotiate the legal agreement indicated above.

- 2.4 That the Director of Planning and Sustainable Regeneration is delegated authority to issue the planning permission and impose conditions and informatives to secure the following matters:

Conditions

- 1) Commencement time limit of 3 years
- 2) Carried out in accordance with the approved drawings

Pre-commencement

- 3) Construction Logistics Plan

Prior to above ground floor slab level

- 4) External materials and detailing (proposed dwellinghouse)
- 5) Landscaping, hard standing, and boundary treatments
- 6) Biodiversity enhancement strategy
- 7) Final sustainable urban drainage details
- 8) Cycle and Refuse/Recycling final details

Compliance

- 9) Materials to match and making good (flatted development)
- 10) In accordance with arboricultural report
- 11) In accordance with fire safety strategy
- 12) Proposed dwellinghouse to be built to M4(2) accessibility standard
- 13) Water usage limitation
- 14) Removal of permitted development rights for proposed dwelling
- 15) Any other planning condition(s) considered necessary by the Director of Planning and Sustainable Regeneration

Informatives

- 1) Community Infrastructure Levy
- 2) Code of Practice for Construction Sites
- 3) Construction Logistics Informative
- 4) Any other informative(s) considered necessary by the Director of Planning and Sustainable Regeneration

2.5 That, if by 14 December 2023 (3 months) the legal agreement has not been completed, the Director of Planning and Sustainable Regeneration is delegated authority to refuse planning permission.

3 PROPOSAL AND LOCATION DETAILS

Proposal

3.1 The proposal would involve the conversion of the existing hotel (so change of use from C1 hotel to C3 residential) building into 6 flats and a new detached dwellinghouse where there is an existing car park.



Figure1: Streetscene image of proposal, existing converted property to right and new house to left with 9 Aberdeen Road far left

3.2 The proposed changes to the existing hotel to enable residential occupation are as follows:

- Reversing the bottom run stair on the northern and western elevations;
- Superfluous drainage removed on eastern elevation;
- Changes to the landscaping;
- Northern elevation changes:
 - Infilling an existing door at lower ground/basement level;
 - Superfluous drainage removed;
 - Door infilled at ground floor in brickwork to match;
 - New timber door at ground floor to match existing;
 - New fences (1.8m high timber);
 - Extraction duct removed.

3.3 The proposed house would be to located where the existing car park for the hotel currently sits, fronting Aberdeen Road.

Amendments

3.4 During the course of the application amendments were sought in relation to the roof form and materials of the proposed dwellinghouse and the waste/recycling and cycle store. As these are considered to be minor to the scheme, a re-consultation was not required.

Site and Surroundings

3.5 The site is located on the corner of St Peter's Road and Aberdeen Road, in South Croydon. The property comprises a hotel building, and associated car park and grounds.



Figure 2: OS Map

Planning Designations and Constraints

3.6 The site is subject to the following formal planning constraints and designations:

- Croydon Opportunity Area
- PTAL: 5
- Flood Risk Zone: 1; low risk of surface water flooding
- Archaeological Priority Area – Central Croydon

3.7 The site sits within a Controlled Parking Zone (West Permit Zone).

Planning History

3.8 There are no relevant planning decisions made on the site.

Relevant Pre-Application History

3.9 20/06370/PRE - Conversion of hotel into 7no residential units, with a further 3 residential units with a new build development on the site.

4 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The existing hotel use is not protected by policy.
- The principle of residential conversion and an additional house is acceptable given the residential character of the surrounding area and the need for housing.
- The proposed development would be acceptable in terms of its design, with limited change to the existing building and a new house that seeks to pick up on design details from the existing building.

- Three family sized units would be created, and the scheme overall would provide a good standard of residential accommodation.
- The proposal would not have a detrimental impact on highway safety, subject to conditions and a section 106 agreement.
- The proposal would not result in unacceptable harm to neighbouring amenity.
- The impact on trees and biodiversity is acceptable, subject to conditions.
- All remaining sustainability aspects can be controlled by conditions.

4.1 The following sections of this report summarise the officer assessment and the reason for the recommendation.

5 CONSULTATION RESPONSE

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

5.2 The following were consulted regarding the application:

English Heritage – Greater London Archaeology Advisory Service (GLAAS)

5.3 No objection

Strategic Transport

5.4 Amendments have been made to respond to comments. Further detail is provided below.

Trees

5.5 No objection subject to conditions.

6 LOCAL REPRESENTATION

6.1 A total of 35 neighbouring properties were notified about the application and invited to comment. 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: 8 Objecting: 6 Supporting: 0 Comments: 2

6.2 The following Councillor made representations:

- Councillor Michael Neal

6.3 The following issues were raised in representations that are material to the determination of the application, and they are addressed in substance in the next section of this report:

| Objection | Officer comment |
|---|---|
| Character and design | |
| New building is out of character | These comments will be addressed in paragraphs 8.11 – 8.26. |
| The building appears too tall (Design and Access Statement, item 13); the building should be limited to 2 storeys | |
| The building line should be set back | |

| | |
|---|---|
| Overdevelopment | |
| Obtrusive by design | |
| Retention of existing commercial extraction chimney | |
| Neighbouring amenity | |
| Overshadowing/loss of light | These comments will be addressed in paragraphs 8.42 – 8.51 |
| Noise Levels | |
| Overlooking/loss of privacy | |
| Transport and Highways impacts | |
| Impacts on road safety | These comments will be addressed in paragraphs 8.57 – 8.70 |
| Restricts parking | |
| Restricts road access | |
| Disagree with the car-free housing policy; however, the policy should be reinforced with a clear exclusion of the right to local parking permits applied to all 7 dwellings | |
| Local streets are unsuited to travel by bicycle, with steep inclines and heavy loads of vehicles. There is a lot of on-street parking and no facility to separate cyclists from vehicles. The development would increase the number of delivery vehicles, which would be a dangerous obstruction to cyclists. | |
| Tress and ecology | |
| Trees currently overhang the pavement, causing a hazard; a specific condition to maintain these trees in such a way to avoid a hazard would be helpful. | These comments will be addressed in paragraphs 8.52 – 8.56 |
| Other planning matters | |
| Neighbours not consulted | The consultation process was undertaken correctly and within the statutory process. |
| Not material matters | |
| Who would have access to the flats; private tenants? | This is not a material consideration; the scheme is for use class C3. |
| Omission of contextual photographic evidence of No. 20 St Peter's Road. | This is not a requirement. |
| Planning permission should specifically allocate responsibility to the freeholders of the converted hotel and the new building for the provision and maintenance of boundary fences/walls with No. 20 St Peters. This maintains present responsibility. | As this is a party wall matter, this is not within the remit of planning. |
| Neutral Comments | Officer comment |
| Neutral to the change of use of the flats | This is noted |

6.4 Local Ward Councillor, Michael Neal, objected to the proposed development and referred the planning application to be considered by planning committee. The councillor raised the following concerns in relation to the proposed development:

- No parking provision on site with 7 homes being proposed;
- Only 10 parking spaces allocated in Aberdeen Road resulting in lack of parking from additional homes;
- Overdevelopment of the site, the detached home on the car parking means no parking provision, the car park should be maintained;

- Overlooking on number 4a St Peter's Road.

7 RELEVANT PLANNING POLICIES AND GUIDANCE

Development Plan

7.1 The Council's adopted Development Plan consists of the London Plan (2021), the Croydon Local Plan (2018) and the South London Waste Plan (2022). Although not an exhaustive list, the policies which are most relevant to the application are:

London Plan (2021)

- D1 London's form, character and capacity growth
- D3 Optimising site capacity through the design led approach
- D4 Delivering Good Design
- D5 Inclusive Design
- D6 Housing Quality and Standards
- D7 Accessible Housing
- D12 Fire Safety
- H1 Increasing Housing Supply
- H2 Small Sites
- G5 Urban Greening
- G6 Biodiversity and access to nature
- G7 Trees and Woodlands
- SI 2 Minimising Greenhouse Gas Emissions
- SI 8 Waste Capacity and Net Waste Self-Sufficiency
- SI 12 Flood Risk Management
- SI 13 Sustainable Drainage
- T4 Assessing and Mitigating Transport Impacts
- T5 Cycling
- T6 Car Parking
- T6.1 Residential Parking
- T7 Deliveries, Servicing, and Construction

Croydon Local Plan (2018)

- SP2 Homes
- SP4 Urban Design and Local Character
- SP6 Environment and Climate Change
- DM1 Housing Choice for Sustainable Communities
- DM10 Design and Character
- DM13 Refuse and Recycling
- DM16 Promoting Healthy Communities
- DM19 Promoting and Protecting Healthy Communities
- DM23 Development and Construction
- DM25 Sustainable Drainage Systems and Reducing Flood Risk
- DM27 Biodiversity
- DM28 Trees
- DM29 Promoting Sustainable Travel and Reducing Congestion
- DM30 Car and Cycle Parking in New Development
- DM46 South Croydon

- 7.2 The Development Plan should be read as a whole, and where policies conflict with each other, the conflict must be resolved in favour of the policy contained in the last document to be adopted, approved or published as part of the development plan, (in accordance with s38(5) of the Planning and Compulsory Purchase Act 2004).

Planning Guidance

National Planning Policy Framework (NPPF)

- 7.3 Government Guidance is contained in the NPPF, updated on 20 July 2021, and accompanied by the online Planning Practice Guidance (PPG). The NPPF sets out a presumption in favour of sustainable development, requiring that development which accords with an up-to-date local plan should be approved without delay. The NPPF identifies a number of key issues for the delivery of sustainable development, those most relevant to this case are:

- Delivering a Sufficient Supply of Homes
- Promoting Sustainable Transport
- Achieving Well Designed Places

SPDs and SPGs

- 7.4 There are also several Supplementary Planning Documents (SPD) and Supplementary Planning Guidance (SPG) documents which are material considerations. Although not an exhaustive list, the most relevant to the application are:

- Croydon Opportunity Area Planning Framework (January 2013)
- Section 106 Planning Obligations in Croydon and their relationship to the Community Infrastructure Levy (2019)
- London Housing SPG (March 2016)
- Technical Housing Standards: Nationally Described Space Standard (2015)
- London Mayoral Affordable Housing SPG: Homes for Londoners (August 2017)
- National Design Guide (2021)

8 MATERIAL PLANNING CONSIDERATIONS

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

1. Land use principle
2. Design and impact on character of the area
3. Quality of residential accommodation
4. Impact on neighbouring residential amenity
5. Trees, landscaping and biodiversity
6. Access, parking and highway impacts
7. Flood risk and energy efficiency
8. Archaeology
9. Fire safety
10. Other planning issues
11. Conclusions

Land use principle

Loss of Hotel Use

- 8.2 The application site falls within the policy designation for the Croydon Opportunity Area (COA). The Croydon Local Plan 2018 (CLP) outlines the relevant policies and the overarching vision for the area over the plan period; it states that within the COA, the council will adopt a flexible approach to leisure and visitor accommodation and will focus this within the Croydon Metropolitan Centre.
- 8.3 The application site does not fall within the Croydon Metropolitan Centre, instead falling within the outer area (southern and old town region), bordered by the boundaries of South Croydon. In this instance, the loss of the hotel can be supported by planning policy.

Introducing Residential Use

- 8.4 The CLP sets out a housing target of 32,890 homes over a 20-year period from 2016-2036 (1,645 homes per year). The London Plan 2021 (LP) requires 20,790 of those homes to be delivered within a shorter 10-year period (2019-2029), resulting in a higher target of 2,079 homes per year.
- 8.5 The CLP also sets out a target for development on Windfall sites of 10,060 homes (approximately 503 per year). The LP requires 6,410 net completions on small sites (below 0.25 hectares in size) over 10 years, with a small sites housing target of 641 per year.
- 8.6 LP policy H1 outlines that boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites, especially the following sources of capacity: a) sites with existing or planned PTALs of 3-6 or which are located within 800m distance of a station or town centre boundary.
- 8.7 The site has a PTAL of 5 and it is within approx. 300m of South Croydon train station; therefore, the property is considered to be suitable for residential use.

Unit Mix

- 8.8 CLP Policy SP2.7 sets a strategic target for 30% of all new homes over the plan period to have 3 or more bedrooms to meet the borough's need for family sized units and ensure that a choice of homes is available in the borough.
- 8.9 The proposal includes the following provision: 3x1bed/1person units; 1x1bed/2person units; and 3x3bed/5person units. This would be a provision of 43%, which exceeds the policy requirement.

Principle conclusion

- 8.10 The loss of a hotel use and seeking to optimise housing delivery on this site, as well as the unit mix are considered to be acceptable.

Design and impact on character of the area

- 8.11 CLP policy SP4.1 states that the council will require development of a high quality, which respects and enhances Croydon's varied local character and contributes positively to public realm, landscape and townscape to create sustainable communities.

- 8.12 CLP policy DM10.1 has a presumption in favour of 3 storey dwellings, which should respect the development pattern, layout; siting, the scale, height, massing, and density; and the appearance, existing materials, and built and natural features of the surrounding area.
- 8.13 CLP policy DM10.1 (a) requires the development pattern, layout and siting to respect that of the surrounding area. CLP policy DM10.1 (c) requires proposals to respect the appearance, existing materials and built and natural features of the surrounding area.
- 8.14 CLP policy DM10.7 requires developments to incorporate high quality materials that respond to the local character in terms of other things durability, attractiveness, sustainability, texture and colour. This policy also requires roof forms to positively contribute to the character of the local and wider area with proposals being sympathetic with its local context.
- 8.15 LP policy D3 states that a design-led approach should be pursued and that proposals should enhance local context by delivering buildings and spaces that positively respond to local distinctiveness.

New Dwellinghouse

- 8.16 The proposed dwellinghouse located in the western part of the site would be 2 storey (plus loft) and would be separate from the flatted development physically by a new brick wall.
- 8.17 The scale of the dwellinghouse is considered to be appropriate to the surrounding area; between the existing building onsite and the neighbouring building at No. 9 Aberdeen Road, the height and massing would be a 'stepping stone'. The image below demonstrates the proposed streetscene.



Figure 3: Streetscene image of proposal

- 8.18 The proposal respects the development pattern and the spaciousness of this section of Aberdeen Road and the surrounding streets. The proposed dwellinghouse would not create an overly dense appearance of the area, and it respects the building line of Aberdeen Road, mediating between the existing hotel building and the neighbouring No. 9 Aberdeen Road. The scale and massing is considered to be appropriate for the area, and the siting of the proposal within the plot is comfortable.
- 8.19 The proportions of the new dwelling are designed to match that of the existing property; this is evident with the steep pitched roof, which is the same angle as that pitched roof focal point of the hotel building. Additionally, the side elevation of the existing hotel building has a double roof; although this consists of a gable end roof and a hipped roof, the principle of the double pitch is relevant.



Figure 4: Existing flank elevations of hotel building

8.20 In terms of the wider area, there are more examples of this roof type. Specifically, No. 14 St Peter's Road (approved under 19/03716/FUL) is of a similar style to the proposed dwellinghouse (albeit on a much larger scale), with the double pitched roof with steep angles. It is evident from this example in the vicinity of the site that this design works well with the surrounding area and provides a modern design which is sympathetic and complementary to the existing built environment. The image below is taken from St Peter's Road, looking south; this illustrates the roof pitch style of the area.



Figure 5: Picture taken from St Peter's Road illustrating roof forms

8.21 The materials for the proposed dwelling consist of ibstock brick funton old Chelsea stock, which is similar in colour to that of the hotel building, and it has a variance to the brick which offers depth to the elevations. The roof tiles would be eternity slate tiles, which would match the existing slate roof of the hotel building, and this also ties in with the recent development at No. 14 St Peters Road.

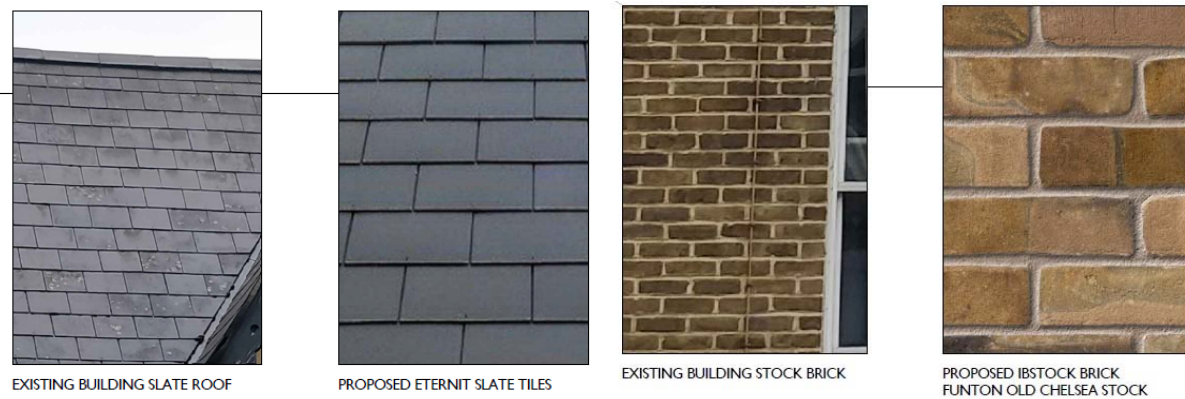


Figure 6: Proposed Materials

Flatted Development

- 8.22 There are minimal changes to the existing building externally; the proposed changes would involve materials to match the existing building and making good the building fabric. This aspect will be secured via condition. The fenestration changes proposed on the northern elevation would not have a detrimental impact on the appearance of the building. The alteration of the external stair, in terms of reversing the bottom stair run to face north, rather than south (as existing), is acceptable.
- 8.23 The changes to the elevations of the existing hotel building would match; the brickwork used to remove windows and doors would match the bricks of the elevations, and the new door would be timber. The windows would be metal, and there would be a painted metal canopy above the front entrance door.
- 8.24 The proposed refuse/recycling and cycle store would have brickwork walls, timber doors, and a metal roof. Final details of this will be secured via condition.

Landscaping

- 8.25 The grounds within the site consist of grass, trees, and hedging. The proposed site plan demonstrated that this would be retained and further developed upon. The existing grounds of the site consists of landscaping around the borders and paving around the hotel building up to the boundary wall. The existing car park is tarmacked, with some trees along the western boundary.
- 8.26 The proposal demonstrates that the paving would be replaced with grass and landscaping, to include hedging around the windows of habitable rooms to create defensible space and hedging for screening the refuse/recycling and cycling store. The plans include indicative detail for the soft landscaping, which is supported. Officers would seek final details of these and for the hardstanding also; these aspects would be secured via condition.

Quality of residential accommodation

- 8.27 LP policy D6 states that housing developments should be of a high quality and provide adequately sized rooms with comfortable and functional layouts. It sets out minimum Gross Internal Area (GIA) standards for new residential developments. CLP policy SP2.8 also deals with quality and standards.
- 8.28 The table below demonstrates the GIAs of each residential dwelling:

| Unit | Size (bedroom/person) | GIA (sqm) proposed | Min. GIA (sqm) | Amenity Space (sqm) | Min. Amenity Space (sqm) | Built in storage space (sqm) | Min. built in storage space (sqm) |
|-------|-----------------------|--------------------|----------------|---------------------|--------------------------|------------------------------|-----------------------------------|
| 1 | 1b/1p | 37.1 | 37 | 6.1 | 5 | 0 | 1 |
| 2 | 1b/1p | 37.6 | 37 | 6.2 | 5 | 0 | 1 |
| 3 | 3b/5p | 106.7 | 93 | 24.5 | 8 | 1.7 | 2.5 |
| 4 | 1b/2p | 63.7 | 50 | 0 | 5 | 0.4 | 1.5 |
| 5 | 1b/1p | 42.5 | 37 | 0 | 5 | 0.2 | 1 |
| 6 | 3b/5p | 98.8 | 93 | 0 | 8 | 1.0 | 2.5 |
| House | 3b/5p | 109.0 | 99 | 32.5 | 8 | 4.1 | 2.5 |

Table 1: scheme considered against London Plan Policy D6 and Table 3.1

8.29 All units meet and exceed the internal space standards in terms of unit sizes and bedroom sizes. The flats would be at least dual aspect and have good layouts and circulation space.

8.30 LP policy D6 part 8 states that the minimum floor to ceiling height must be 2.5m for at least 75% of the GIA of each dwelling. The proposed dwellinghouse would have a floor to ceiling height of 2.5m at ground and first floor, and 2.27m at loft level. This would equate to approximately 23% of the total GIA, therefore this is compliant with LP policy.

8.31 The flats would have varied floor to ceiling heights, between 2.41m and 2.77m. Flats 1, 2, 4, and 5 would consistently have more than 2.5m floor to ceiling height. Flat 3 would have a floor to ceiling height of more than 2.5m for 77% of the total GIA, therefore, this is policy compliant. Flat 6 would have a 2.5m floor to ceiling height for 38.95% of the total GIA. While this is not policy compliant, the floor to ceiling height of the top floor of the building (first floor of unit 6) has a floor to ceiling height of 2.41m, which is a marginal shortfall from the LP policy requirement. Furthermore, the Nationally Described Space Standards 2015 requires the minimum floor to ceiling height to be 2.3m. Additionally, while the floor to ceiling height is not compliant, this aspect is dictated by the existing building envelope. Taking these aspects into account, Officers apply a balance judgment and consider this acceptable. Therefore, while there is a shortfall from the LP policy standards, the floor to ceiling height would not have a significant adverse impact on the living conditions of the unit as a whole.

8.32 It is noted that units 1 to 6 do not meet the minimum built in storage, so they do not comply with policy. However, weight is given to the fact this is a conversion scheme as opposed to a new build scheme.

Amenity Space

8.33 CLP policy DM10.4c states: All proposals for new residential development will need to provide private amenity space that provides a minimum amount of private amenity space of 5m² per 1–2-person unit and an extra 1m² per extra occupant thereafter.

8.34 CLP policy DM10.4d requires the provision of child play space. CLP policy DM10.5 outlines the requirement for high quality communal outdoor amenity space that is designed to be flexible, multifunctional, accessible and inclusive.

8.35 In terms of private amenity space, unit 3 and the new house significant exceed policy requirements. Three units would not have private amenity space, namely units 4, 5 and 6. CLP paragraph 6.76 states: *In exceptional circumstances where site constraints make it impossible to provide private outdoor space for all dwellings, indoor private*

amenity space may help to meet policy requirements. The area provided should be equivalent to the private outdoor amenity space requirement and this area added to the minimum Gross Internal Area. Given the conversion nature of this scheme, and the desire to avoid external additions given the quality of the building, officers consider the exception above is appropriate. The internal floor areas of units 4 and 5 have an uplift to compensate for the lack of external space. It is noted that unit 6 does not make the full provision internally, with a shortfall of just over 2sqm. Balancing the fact this is a conversion alongside the overall provision of communal amenity and child play space within the site, no objection is raised.

- 8.36 The private amenity space for units 1 and 2 does not have the required width (1.5m), however, this space is dictated by the existing building and site layout. Therefore, while this should be large, these courtyards serve as a cycle parking for the individual units and provide some form of private amenity space. Additionally, these units have access to the wider landscaped area and the provided communal amenity space. Given that these are 1b/1p units, this would be considered acceptable.
- 8.37 The surrounding in-curtilage space within the site would serve as general communal amenity space, however, there is a designated communal amenity and child play space area to the north-centre of the site. The minimum requirement for child playspace is 9.5sqm; the proposal would provide 12sqm of designated child playspace and so exceeds the policy requirement.

Accessibility

- 8.38 LP policy D7 outlines that in order to provide suitable housing and genuine choice for London's diverse population (incl. disabled people, older people and families with young children), residential development must ensure that at least ten percent (10%) of dwellings are compliant with Building Regulation M4(3) and all remaining dwellings are compliant with Building Regulation M4(2).
- 8.39 The proposed house would appear to be M4(2), in that it would be adaptable, which would be secured by condition and fully considered through Building Regulations.
- 8.40 The hotel building currently has steps to the main front door and to the rear via the staircases. The proposed conversion does not propose to change this arrangement, meaning all the flats would be M4(1). LP supplementary paragraphs to D7 state in exceptional circumstances lift provision to dwelling entrances may not be achievable such as small-scale infill developments, and generally in blocks of four stories or less, and to H2 state homes on the ground floor should be M4(2), whilst homes not on the ground floor can comply with the M4(1) standard, where provision of step-free access would be unfeasible. In this instance, the proposal is for conversion of an existing three-storey block where the current ground floor is not accessible step-free. The lowering of the ground floor level or inclusion of ramps (particularly the access to flats 3 and 4) is considered unfeasible and therefore officers raise no objection to the converted units being to M4(1) only.
- 8.41 In conclusion, the new house would meet all policy requirements in terms of quality of accommodation. Whilst there are some policy conflicts with the converted homes identified above (head heights, storage space, private amenity and accessibility), weight is given to the fact this is a conversion where there are more limitations than for a new build scheme, and therefore on balance no objection is raised as the homes would still be considered of good quality.

Impact on neighbouring residential amenity

8.42 CLP policy DM10.6 states that the Council will ensure proposals protect the amenity of occupiers of adjoining buildings and will not result in direct overlooking into their habitable rooms or private outdoor space and not result in significant loss of existing sunlight or daylight levels. CLP policy DM10.6(c) outlines that proposals for development should not result in direct overlooking of private outdoor space (with the exception of communal open space) within 10m perpendicular to the rear elevation of a dwelling.

No. 9 Aberdeen Road

8.43 This neighbouring property is a detached dwellinghouse to the west of the application site. It accommodates a detached garage on the eastern boundary (close to the party line shared with the application site), and the detached dwelling house is set back from this boundary by approximately 7.8m. The main garden area for No. 9 Aberdeen Road is to the west of the dwellinghouse.



Figure 7: Proposed floor plan and elevation of No. 9 Aberdeen Road and the proposed dwellinghouse

8.44 Given the distance of the buildings to one another (9.2m), the scale of the proposed dwellinghouse, and the orientation of the site in relation to No. 9 Aberdeen Road, it is unlikely this would result in a loss of light or overshadowing. The dwellings would be spaced sufficiently apart, and the proposed dwelling is appropriately scaled to ensure this would not result in a sense of enclosure for neighbouring occupants.

8.45 The proposed dwellinghouse does not have any side windows; coupled with the orientation of windows on the front and rear, this aspect of the development would not result in loss of privacy or overlooking.

8.46 The flatted development is situated a significant distance from this neighbouring property (24.5m), and there are minor changes proposed to this building, therefore, this would not create adverse impacts for No. 9 Aberdeen Road. The conversion to residential is noted, but given the separation, existing uses as a hotel and giving weight to the existing car parking area in this location currently, the scheme is acceptable.

No. 20 St Peter's Road

8.47 The neighbouring property to the north (No. 20 St Peter's Road) is a two/three storey detached building which contains 4no. flats. The rear garden is approximately 25m and has been subdivided lengthways. The proposed dwellinghouse would be built adjacent to the rearmost part of the garden associated with this neighbouring property. There are minimal changes to the existing hotel building facing No. 20 St Peter's Road, none

of which include extension to the existing building, although a change of use is proposed.

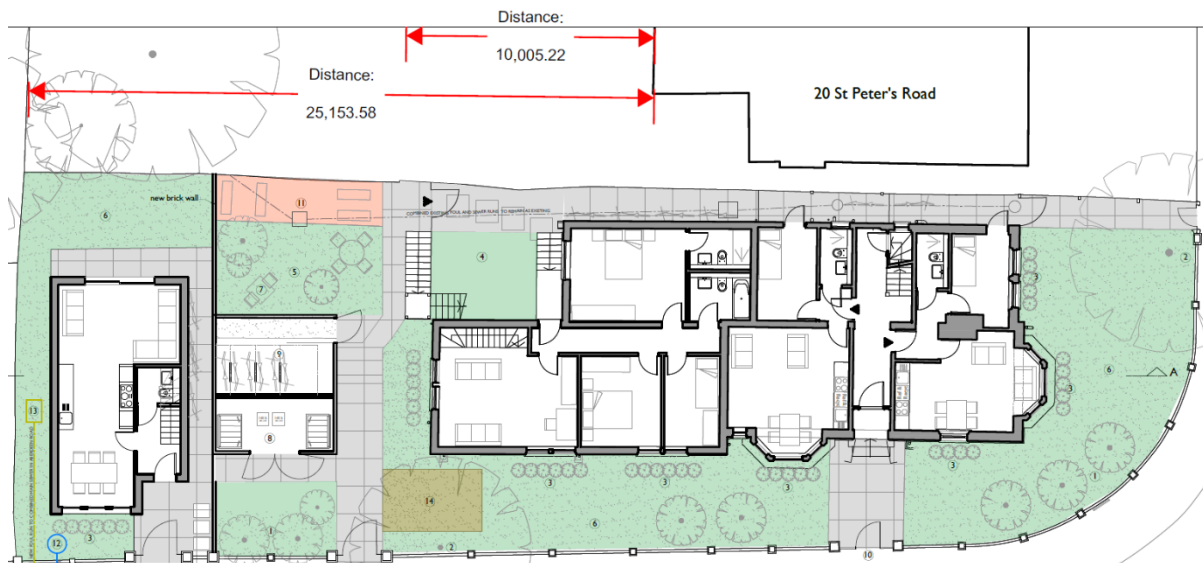


Figure 8: Proposed floor plan of the development and No. 20 St Peter's Road

- 8.48 The plan above demonstrates the 10m depth of the garden from the rear building line; this illustrates the relationship of the proposed dwellinghouse to the neighbouring property. It is evident that the proposed dwellinghouse is situated at a sufficient distance to mitigate any adverse impacts such as loss of light and overshadowing, loss of privacy and overlooking of the residential units, and creating a sense of enclosure.
- 8.49 In terms of overlooking of the rear garden associated with No. 20 St Peter's Road, the first 10m of the garden would not be overlooked given the separation and orientation. The rear portion of the neighbouring garden adjacent to the proposed dwellinghouse would not be overlooked to an adverse degree, above and beyond a standard amount for an urban location.
- 8.50 The site would be in residential use, therefore noise levels are not anticipated to exceed standard domestic levels. Given that this is an area with predominantly residential spaces, the proposal would not be out of character in this regard to result in an unacceptable impact on amenity.
- 8.51 Overall, the proposal would not have an unacceptable impact on residential amenity.

Trees, landscaping and biodiversity

- 8.52 LP Policy G7 and CLP policy DM10.8 and DM28 seek to retain existing trees and vegetation. CLP policy DM10.8 requires proposals to incorporate hard and soft landscaping.
- 8.53 The application is accompanied by an Arboricultural Implications Assessment. A total of 11 trees were inspected, concentrated to the western portion of the site. 5 are within the application site and 6 beyond the red line of the application but considered given their proximity. A total of 3 trees are proposed to be removed: T2 (U grade), T3 (C grade) and T4 (C grade). T2 (a Horse Chestnut) leans east and has extensive decay so requires felling on safety grounds.

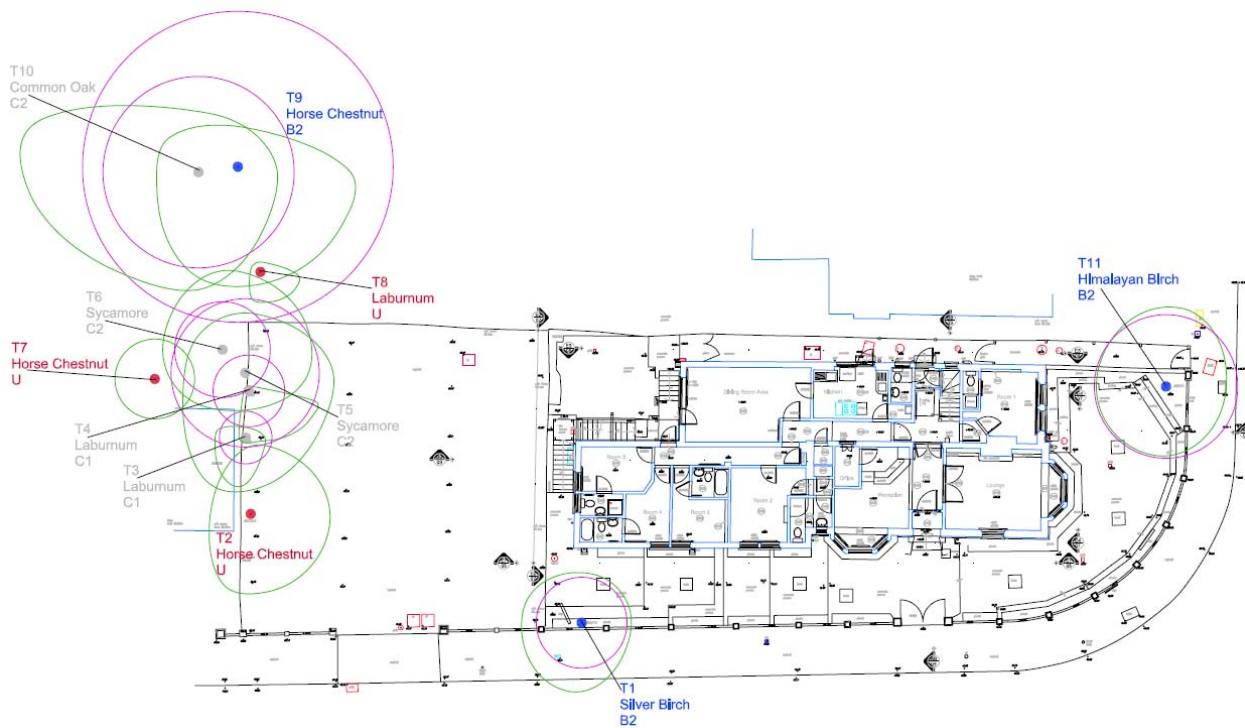


Figure 9: Existing Tree Plan

- 8.54 The proposal was reviewed by the tree officers who consider this information acceptable, subject to a condition to ensure compliance with the arboricultural document submitted.
- 8.55 New trees are proposed on the southern elevation to screen the refuse/recycling and cycling store; this is demonstrated on the proposed site plan. A condition will be included to ensure that replacement trees are planted to mitigate the loss of the trees.
- 8.56 Comparing the existing situation with the proposed site plan, there would be a significant increase of greenspace, which is a biodiversity enhancement. A condition will ensure biodiversity enhancements are brought forward.

Access, parking and highway impacts

- 8.57 LP Policies T4, T5, and T6 (and Table 10.3) set out parking standards for proposed development. CLP Policies SP8.17, DM29 and DM30 provide further guidance with respect to parking within new developments and state that development should not adversely impact upon the safety of the highway network.
- 8.58 CLP policy DM13 sets out refuse and recycling policy requirements. Additionally, Waste and Recycling in Planning Policy Document August 2015 (Edited October 2018) sets out more detailed guidance in this regard.
- 8.59 The site has a PTAL of 5, which is very good (on a scale where 0 is the worst and 6 is the best). The site has a vehicle access point on Aberdeen Road, and it is located within Controlled Parking Zone West, which is operational Monday-Saturday between 9am-5pm. St Peter's Road is a classified road (B274). Beyond this CPZ to the east lies the South Parking Zone.
- 8.60 The application includes the removal of the existing onsite car parking serving the hotel; no on-site car parking is proposed for this scheme. The LP policy T6.1 states

that development in areas of PTAL 5 or above (as is the case here) schemes should be car free (with the exception of blue badge spaces, see below). Therefore a car free scheme is supported by policy and is acceptable.

- 8.61 The surrounding area is part of the Controlled Parking Zone West and Controlled Parking Zone South. To reduce the potential for on-street parking stress, Officers consider it necessary to restrict future occupants of the development from gaining car parking permits for the CPZ and contracts in council run car parks; this will be secured by way of a Section 106 Agreement. It is also recommended that each residential unit would have car club membership for a period of 3 years; this would also be secured via the Section 106 Agreement.
- 8.62 Given the removal of on-site car parking, the existing crossover is redundant and therefore this should be removed via Section 278 agreement. A small section of dropped kerb should be retained for refuse/recycling bin collections. This will be secured via Section 106 Agreement.
- 8.63 No disabled parking bays are to be provided within the site; however, the proposal is not a major development and there are no Part M4(3) compliant dwellings being proposed under this submission. It is considered that this arrangement would be considered acceptable.
- 8.64 A financial contribution of £10,500 will be secured via Section 106 Agreement to contribute towards sustainable transport initiatives in the local area in line with CLP policies SP8.12 and SP8.13. These include matters such as the delivery of electric vehicle charging infrastructure and car club spaces to support sustainable transport in the borough (as required by CLP Policy SP8.13).
- 8.65 The proposal includes cycle parking provision, consisting of a communal cycle store with 6no. parking spaces, and provision for a larger adaptable bike. Flats 1, 2, and 3, and also the proposed dwellinghouse would have cycle parking spaces in each of their amenity spaces but would not be located within a secure and lockable stores. The plans show the indicative cycle parking layouts; therefore, it would be considered acceptable to secure the final details via condition.
- 8.66 Short-stay cycle parking is required to provide 2no. spaces for the development, in accordance with LP policy T5. This is not shown on the plans, however, there is ample space within the development for this provision. The requirement to provide this will form part of the condition requiring final details on cycle parking as above.
- 8.67 The proposal includes a refuse store for the flats located in a combined unit with the cycle parking, which although housed in the same detached building are internally segregated. There are 4no. bins shown in the unit, however, it has not been specified what the capacity amount would be in order to ensure an adequate provision. Given that a generous refuse/recycling store is provided with indicative capacity, there is sufficient comfort for further details to be secured via condition.
- 8.68 The communal bin store is within 20m of the street for the operators (7.5m) and located 29.5m from the front entrance of the building; future occupants would be required to leave the site to re-enter, in order to access the bin store, however, this is within acceptable distances. Additionally, given that this is a conversion scheme, and the bin store is located in the most appropriate location within the site, this is considered to be acceptable.

- 8.69 A bulky waste storage area has been incorporated, which is 10sqm and located beside one of the site entrances on Aberdeen Road. This is a demarcated area, the location and size of which is considered to be acceptable.
- 8.70 A condition will be attached to require submission of a Construction Logistics Plan (CLP) and a condition survey of the surrounding footways and carriageway prior to commencement of works on site.

Flood Risk

- 8.71 CLP Policy SP6 sets out the Council's approach to flooding. The policy requires: Flood Risk Assessments to be submitted for major developments, with proposals in Flood Zones 2 and 3 providing site-specific information proportionate to the degree of flood risk posed to and by the development; and all development to utilise sustainable drainage to reduce surface water run-off.
- 8.72 The site is within flood zone 1 and it is of low risk in terms of surface water flooding. The application is accompanied by a Flood Risk Assessment and SuDS Strategy. The submitted document sets out the recommended resilience measures which can be incorporated to utilize flood resilient techniques recommended. It also recommends that detailed drainage designs, together with detailed landscaping details should be confirmed as part of the landscape and ecology design and management plan. This information is indicative of further works, therefore, to build on this, a condition will be included to ensure full details of SuDS are submitted. This is considered acceptable for a conversion scheme with one additional house proposed.

Archaeology

- 8.73 LP policy HC1 part D outlines that development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes. The protection of undesignated heritage assets of archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets.
- 8.74 CLP policy DM18.9 outlines that in consultation with the Greater London Archaeological Advisory Service (GLAAS), or equivalent authority, the Council will require the necessary level of investigation and recording for development proposals that affect or have the potential to affect Croydon's archaeological heritage. Remains of archaeological importance, whether scheduled or not, should be protected in situ or, if this is not possible, excavated and removed as directed by the Greater London Archaeological Advisory Service or equivalent authority.
- 8.75 The application site is located on a site of archaeological interest. The scheme has been reviewed by GLAAS, and they have concluded that the proposal is unlikely to have a significant effect on heritage assets of archaeological interest, and that no further assessment or conditions are therefore necessary.

Fire safety

- 8.76 LP policy D12 part A requires all development proposals to achieve the highest standards of fire safety and ensure that they identify suitably positioned unobstructed outside space. They should include an evacuation assembly point, appropriate

features which reduce the risk to life and serious injury in the event of a fire; appropriate fire alarm systems and fire safety measures, must minimise the risk of fire spread, provide suitable and convenient means of escape and a robust strategy for evacuation as well as provision of suitable access and equipment for firefighting.

8.77 The application is accompanied by a Planning Fire Safety Strategy; the level of detail that is appropriate and reasonable to the scale of development. The statement indicates that fire appliances can access the site and sets out that there is adequate space for an appliance to park to access the development. There are appropriate evacuation assembly points for the dwellinghouse and flats onto Aberdeen Road. All proposed units would have a fire detection and alarm system. There is a suitable evacuation plan and access and equipment for firefighting. Compliance with the submitted information will be secured via condition.

Water Usage

8.78 The proposed dwellings should ensure that a minimum water efficiency standard of 110 litres/person/day as set out in Building Regulations Part G is met. Compliance with this would be secured by planning condition.

Other Planning Issues

8.79 The development would be liable for a charge under the Community Infrastructure Levy (CIL).

Conclusions

8.80 The proposed provision of 7 new residential units (6 flats and 1 dwellinghouse) in this location is acceptable in principle, with no protection afforded to hotels. The proposed dwellinghouse would be of a high-quality design and high-quality materials have been specified, with very minor alterations to the existing hotel building to facilitate conversion. The quality of accommodation is on balance acceptable, noting the transgressions in terms of head heights, storage space, private amenity and accessibility, and the quantity of cycle parking and access arrangements are acceptable. Tree losses would be mitigated by replacement planting and landscaping.

8.81 It would not result in unacceptable impacts in terms of highways, amenity, or environmental impacts, and would result in a sustainable form of development. In addition, subject to the legal agreement and appropriate conditions, the development would be acceptable.

8.82 All material considerations have been addressed, including responses to public consultation. Given the consistency of the scheme with the development plan, and weighing this against all other material planning considerations, the proposal is considered acceptable in planning policy terms.

8.83 All other relevant policies and considerations, including the statutory duties set out in the Equalities Act 2010, the Human Rights Act, the Planning and Compulsory Purchase Act, and the Town and Country Planning Act, have been taken into account. Given the consistency of the scheme with the Development Plan and weighing this against all other material planning considerations, the proposal is considered to be acceptable in planning terms subject to the detailed recommendation set out in section 2 (RECOMMENDATION).