

**1 DETAILS OF THE DEVELOPMENT**

Ref: 23/04171/PRE  
Location: Spurgeon's College, 189 South Norwood Hill, South Norwood, London, SE25 6DJ  
Ward: Thornton Heath  
Description: Mixed use development for redevelopment of the site to provide an extension to the locally listed building and new education building and basement to provide purpose built higher education facilities and extensions to the existing locally listed building and 42 family homes  
Applicant: Spurgeon's College and London Square  
Agent: Richard Quelch  
Case Officer: Katy Marks

**2 PROCEDURAL NOTE**

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

**3 EXECUTIVE SUMMARY**

- 3.1 The scheme currently proposes the redevelopment of the existing college site to allow the College to expand and update their facilities to support their expansion to university status with a wider educational offer. The College is seeking to enable this expansion through selling part of the site to their residential partner to develop 42 family homes.

- 3.2 The Council has been in pre-application discussions with the College since an initial pre-app discussion in 2019. A scheme for circa 115-150 flats was presented twice to Place Review Panel (June 2020 and July 2021). Pre-application discussions with the current development team (the College and their residential partner, London Square) began in December 2022. The initial proposals from the current team were also a flatted scheme, however due to significant concerns raised, the applicant has revised the scheme and submitted a housing scheme in autumn 2023. The current housing proposal has been subject to two pre-application meetings and was presented to the Council's Design Review Panel in November 2023.
- 3.3 Pre-application discussions have focused on appropriate height and massing, impact upon the locally listed building to the centre of the site, type and quality of accommodation, relationship with adjacent neighbours, impact upon the protected trees within the site and impact on transport and affordable housing.
- 3.4 Whilst the move to provide a housing scheme (as opposed to a flatted scheme) is a significant improvement from previous proposals, the current proposal has not yet evolved sufficiently to overcome all of the concerns raised by officers. The applicant and officers are continuing to work together to address the remaining concerns, however the applicant has also indicated that they wish to submit a planning application in early 2024. Members are advised that officers still have significant concerns with the current pre-application scheme, notably the lack of affordable housing and the scheme's impact upon protected trees. These and other areas of concern are outlined in the report below.

## **4 SITE BRIEFING**

### **Site and Surroundings**

- 4.1 The site is located behind the building line to the western side of South Norwood Hill and is accessed between the three blocks of flats at 177-189 South Norwood Hill and the semi-detached house at 191 South Norwood Hill (which is in the applicant's ownership and forms part of the site). The site comprises a Locally Listed Victorian villa (Walker House) and several smaller mid-20th Century buildings in use as a Christian Higher Education Theological College. In addition, there is some student accommodation on the site which is in poor condition and a small bungalow in use as the Principals house. The College currently has about 800 students, full and part-time, and has 92 ministers in training/placements in Baptist and non-Baptist churches and is supported by over 50 staff.



Figure 1: Site Plan

- 4.2 The access to the site is up a steep access road which is currently lined by trees on one side and with stepped access on the other. The access opens up onto an area of landscaping and two large car parks with views of the rear and side of the Walker House (main house). The principal elevations of the building appear to be side and rear elevations.



Figure 2: Photos of rear and side elevations

- 4.3 To the rear of the building is a large lawn, woodland (which also extends along the side boundaries of the site) and a disused tennis court. The woodland covers the majority of the open space on the site to the rear and sides of the site making up roughly a third of the site. The woodland, including the majority of trees to the sides of the site, is protected under a woodland TPO (no. 11 1970). The main part of the site is fairly level in terms of land levels, but land levels fall away on all four sides with the land level changes fairly significantly within the woodland to the rear of the site. Land levels for the site differ (in some places significantly) with land levels for adjacent properties, with the site sitting on an elevated position in comparison to neighbouring properties and gardens.

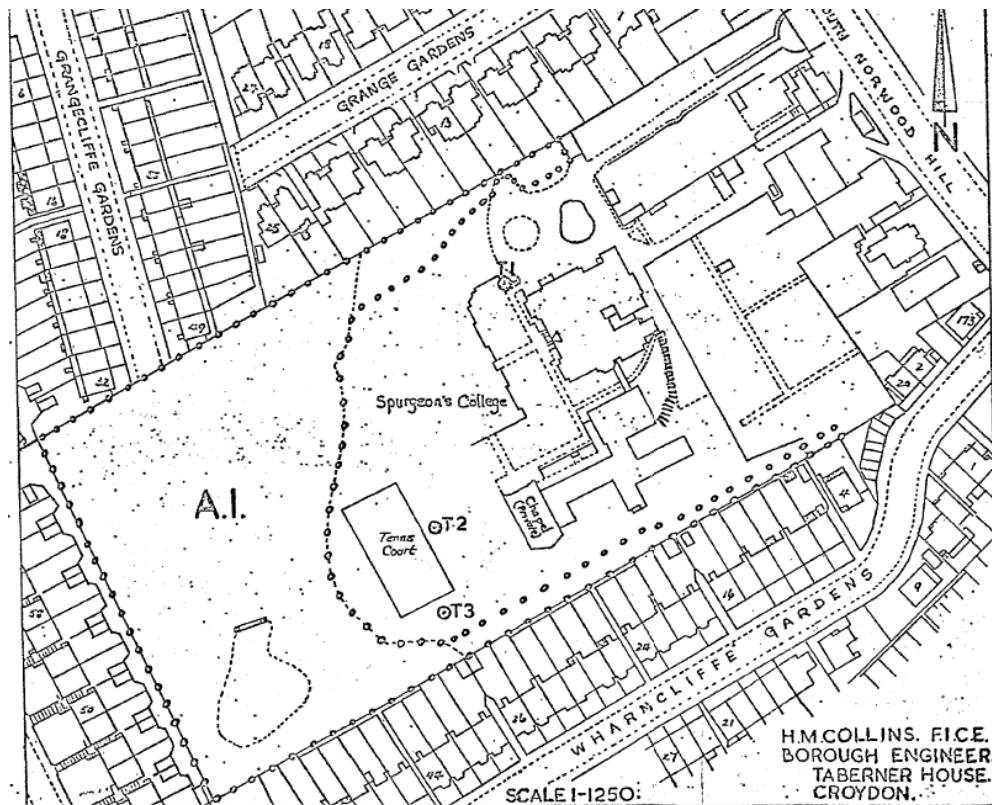


Figure 3: Tree Preservation Order

- 4.4 The surrounding area is generally residential in character with a mixture of terraced and semi-detached properties and flatted developments located along South Norwood Hill (mostly ranging from 2-4 storeys in height) The site is adjoined by modest terraced and semi-detached properties to the north, west and south. To the east it is adjoined by 3 four storey blocks of flats which back onto the site in close proximity to the boundary (the relationship is exaggerated by the land level changes). The site lies close to Grangewood Park (to the west) which is a protected green space, locally listed park and garden and site of nature conservation importance.
- 4.5 The Public Transport Accessibility Level (PTAL) of the site is 2-3, which is the low to medium, however South Norwood Hill provides several bus routes between South Norwood and Crystal Palace/West Norwood.
- 4.6 The site is located with Flood Risk Zone 1 and parts of the site have very low surface water flood risk. The site also sits within a Ground Water Source Protection Zone 2.

### Planning History

- 4.7 An application was approved in 2019 for temporary permission for the erection of two temporary modular buildings for use as an office and classrooms ancillary to the main education use of the College (D1). (ref: 18/03331/FUL). This included removal of several trees to a small area of green space to the entrance of the site. This permission does not appear to have been implemented and the trees have not been removed.



4.8 Prior to this, several older applications have been granted for alterations of the existing buildings on the site:

- 17/02508/FUL: Permission granted for alterations and conversion of The Lodge (the College Principal's accommodation) to form 1 three bedroom and 1 four bedroom dwellings and erection of single storey extensions
- 12/00914/P: Permission granted for demolition of link corridor between main building and library and construction of new wheelchair accessible ramp from main building to library with glazed canopy structure.

4.9 Relevant permissions for adjacent sites:

- 179-189 South Norwood Hill: ref: 06/01730/P – Permission allowed at appeal for the erection of 3 three/four storey buildings comprising a total of 11 three bedroom, 12 two bedroom and 13 one bedroom flats; formation of vehicular access and provision of associated parking.
- Land between 2A and 4 Wharncliffe Gardens: Permission granted for the erection of a block of 2 no. 2-bed apartments (Ref :18/05844/CONR and 18/03950/FUL)

## Proposal

4.10 The current proposal is for the demolition of the ancillary buildings on the site and the rear extension of Walker House and erection of education buildings and 42 houses.

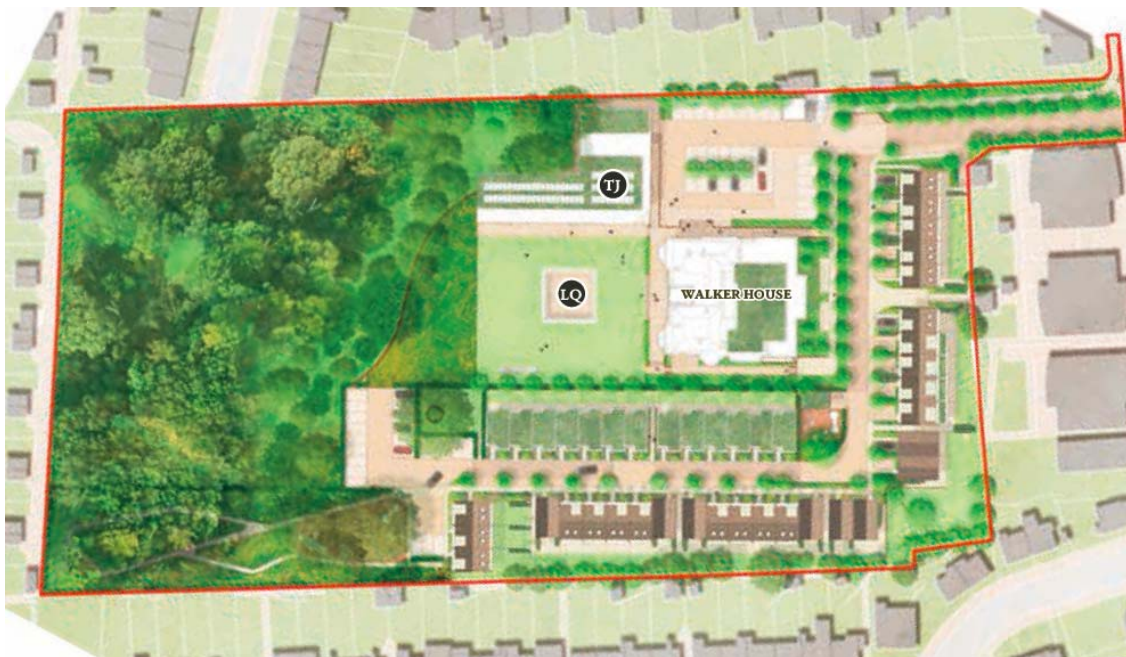


Figure 4: Proposed site plan

4.11 The proposals include the expansion of the education facilities through the following:

- Basement underneath the existing lawn with central lower ground floor courtyard to provide a new library, lecture theatre (with capacity for 120)

and café/break out space; providing basement level connection to Walker House and the Thomas Johnson Building

- Alterations to Walker House and replacement rear extension to adapt the existing facilities and provide new facilities to house 30 offices, 6 meeting rooms, reception, board room, staff room and kitchen and a new chapel (Capacity for 196).



*Figure 5: Basement and extension to Walker House*

- Erection of a part 2, part 3 storey purpose-built education building with connecting basement (Thomas Johnson Building – ‘TJ Building’) to provide a dining area, two lecture theatres (each with capacity for 80) and 13 smaller lecture/meeting rooms (each with capacity of about 30).



*Figure 6: TJ Building footprint*

4.12 The expansion of the education facilities is proposed to be funded through the sale of part of the site for residential development. The proposed residential development is for 42 family terraced and semi-detached houses (all 3- and 4-bedroom properties) arranged in an L-shaped row along the eastern and south eastern boundaries, and an inner row of houses flanking the southern side of Walker House and the central lawn. The houses would have a varied design with pitched roofs to the outer terraces and flat roof design to the inner terrace.



*Figure 7: Whole site massing including residential*

- 4.13 The development would require the removal of circa 80 trees including a significant number of Category B quality trees and would result in built form within close proximity to several category A quality trees.
- 4.14 The development would be supported by a public realm and landscaping scheme, providing a new pedestrian access ramp, new entrance square which would act as a parking quad for the education facilities (to provide 34 parking spaces) with parking for a mini-bus and two car club cars near the entrance of the site. A new road and footways would be built to follow the proposed residential building line, providing pedestrian and vehicle access into the site with 42 parking spaces for the houses either to the front of properties or within a parking area adjacent to the woodland. Communal cycle storage is proposed alongside playspace to the inner corner of residential street adjacent to the rear of Walker House, with landscaping and bin storage to the front of properties. Additional playspace and access would be provided to a small portion of the woodland to the rear.
- 4.15 Officers bring Member's attention to the fact that this scheme is a much-reduced scheme in comparison to previous schemes which included between 114-200 flats. However, whilst the residential element of the scheme has undergone a significant transformation, the quantum of educational floorspace has remained relatively unchanged (albeit that the current scheme has sunk a significant proportion of it below ground). The quantum of educational floorspace is being driven by the College's business plan aimed at securing University title and expanding to provide a range of university degrees beyond its original theology roots.

## **5 DESIGN REVIEW PANEL FEEDBACK**

- 5.1 An earlier version of the scheme was presented to the Council's Design Review Panel (DRP) in November 2023.





Figure 8: Images of the DRP scheme

## 5.2 The Panel's main feedback was as follows:

- The panel was generally comfortable with the amount of above ground massing and provision of family housing instead of flats
- They felt there was clarity on the zoning of the two uses (subject to access across the site for residents)
- However, they felt that the scheme needs a set of place-specific architecture and landscape design principles to celebrate the site's unique architecture and landscape character and to respond to the site's natural topography regarding building footprints and alignments.
- Strategic approach to location and usage of car parking is needed to ensure that it does not feel like a car-led scheme.
- Consideration of the 'journey' of individuals accessing the site needs consideration and clarification to understand the arrival experience and legibility of the site and amenity provided for the two uses
- Landscaping should have a narrative that highlights and enhances the site's distinct woodland character and draws upon the site's history. The whole site should be considered as a parkland. The panel was concerned with the quantum of tree loss.
- The Panel felt that the architectural strategy and manner of articulation required further resolution.



- They suggested that the Applicant should consider Walker House for a statutory listing review before submission of a planning application.
- The panel felt that a holistic approach to landscape and architectural sustainability must be development and embedded into the design development, including biodiversity net gain, urban greening, embodied carbon and passive design solutions.

5.3 Since DRP, the scheme has been updated to respond to some of the comments raised, including further design resolution has been undertaken which have resulted in small changes to the building footprints and layouts, building forms and architectural design, parking numbers and layouts. Officers are encouraging further pre-application discussions with the applicants and feel that further amendments to the scheme are required to overcome current concerns with regards to the impact to trees and affordable housing. Whilst Officers support the DRP comments, given the extent of officer's concerns with regards to loss of mature trees, officers do not consider the quantum of above ground massing is yet acceptable and is likely to require some reduction in the size of the education buildings and number of houses to fully overcome the tree concerns.

#### *Previous Flatted schemes*

5.4 It is worth noting that a previous flatted scheme was presented to DRP twice in summer 2020 and summer 2021. The 2021 scheme was for a very similar scale of development for the education facilities (extension to Walker House, TJ building and education facilities within the ground floor of the southern residential block) and two 5 storey blocks providing 114 flats (with only 30% family homes) including basement and forecourt parking and a Principals house.





*Figure 9: 2021 Flatted Scheme*

5.5 This previous scheme was not positively received by DRP or officers and critically, it also did not support any affordable housing and raised concerns with regards to the impact upon protected trees. DRP raised concerns about the following aspects:

- Concern about the heritage harm from demolition of the service wing of Walker House and quality of the proposed extension although they did not consider that the other buildings on the site had any heritage significance
- Concerns with regards to the prominence of Walker House and scale of the buildings on either side and lack of symmetry
- Concern that the residential buildings would be overbearing both in relation to Walker House and the neighbours along Warncliffe Gardens. Daylight sunlight assessment and consideration of mature trees was encouraged by the Panel.
- Concern with the quality of residential accommodation, particularly the number of single aspect units and the relationship between the two uses and creation of a welcoming public realm
- Need for further evidence with regards to parking levels to support the significant intensification of the site
- Need for further design development with regards to the wooded area and amenity spaces to ensure they are inclusive and welcoming to all users and residents.

5.6 It is worth noting that the flatted scheme raised significant concerns with regards to harm to the locally listed building, housing mix (lack of family homes), lack of affordable housing, poor quality of accommodation, harm to neighbours (due to heights and proximities), insufficient parking, harm to trees.

## **6 SUMMARY OF MATTERS FOR CONSIDERATION**

6.1 The main planning considerations are:

1. Principle of development (land use – education; residential – affordable housing and housing mix)
2. Townscape, heritage and visual impact
3. Housing Quality for future occupiers

4. Impact upon Neighbours
5. Trees, ecology and landscaping
6. Transport
7. Environmental Impact, Sustainability and Flooding
8. S106 obligations

### **Principle of Development**

- 6.2 The proposed development is a mixed-use education and residential development.
- 6.3 The development includes demolition of existing education facilities, but would expand the existing education floorspace on the site. There would be the loss of one house and some student accommodation. There is no policy protection for student accommodation and the College has indicated that the accommodation is not fit for purpose. It is also officers understanding that there is not likely to be demand created through the expansion of the university as the College's current students tend to live within the community and courses are being designed to attract local students who are unlikely to require student accommodation on site.
- 6.4 The Council is currently in the process of partially reviewing the Croydon Local Plan which is expected to be consulted on in early 2024. It should be noted that as was the case in the previously consulted on Regulation 19 version of the Croydon Local Plan Review, it is anticipated that this site will form part of a site allocation. The previous Regulation 19 site allocation was for higher education with residential (for up to 72 homes). The capacity testing for the site allocation under the previous Regulation 19 version was based upon significantly less education floorspace than that proposed in this scheme. The site allocation is being reviewed as part of the current Local Plan review and it is possible that the proposed allocation will change. Given the stage that the partial review is currently at, the site allocation at this point in time has very limited weight.

### *Education*

- 6.5 Croydon's Local Plan policy SP5 supports the growth and improvement of further and higher education in the borough and in particular seek to bring a university or 'multiversity' to Croydon introduction of a new University into the borough. However, this policy and the supporting text specifically identifies the need for a campus location at a suitable site with high public transport accessibility. Policy SP5.13 establishes the principle that university presence in Croydon should be in a form and in a place with space and opportunity for there to be adjoining centre(s) of innovation and the policy encourages the new university/multiversity to be a centre of innovation, enterprise and associated employment. The supporting text provides context, confirming that universities have a track record for innovation and technical developments, many of which have commercial applications. One purpose for establishing a university in Croydon is to provide the opportunity for direct application of new technologies in young and growing enterprises.
- 6.6 In addition, on a broader context, Local Plan policy DM19.2 supports community uses in sustainable locations which are accessible to local shopping facilities,

healthcare, other community services and public transport. It suggests that buildings should be flexible, adaptable and capable of multi-use and enable future expansion.

6.7 The site is currently occupied by an existing Christian Theological College providing specialised Higher Education facilities. Currently the focus of the College is providing theological courses however in 2022 the College was awarded Full Degree Awarding Powers by the Office of Students meaning it can award degrees to students for the first time. The College has therefore begun to expand its courses to include undergraduate and postgraduate courses in Theology and Counselling. The College is expecting to achieve the title of 'University' by 2025. The proposals would expand the existing education facilities on site, supporting the College's ambitions and plan to become a university, providing a wider range of courses and a significant increase in student numbers. The College is in conversations with officers in the Council's Employment, skills and Economic Department with regards to designing and developing undergraduate and postgraduate programmes to meet the educational and employment needs of the Borough. Indicative courses which may cater directly to the local education needs in Croydon include:

Sept 2024	Sept 2025	Sept 2026	Sept 2027	Sept 2028
Bsc (Hons) Integrative Counselling	LLB (Hons) Law  BA (Hons) Business and Public Administration  MA Leadership  MSc Integrative Counselling	BSc (hons) Psychology  BA (Hons) Sociology	BSc (Hons) Economics  BA (Hons) Politics and Public Service	BA (Hons) Education  BA (Hons) History  BA (Hons) English

6.8 The College have provided an indicative student population growth anticipated with their expansion plan. Based on current student admissions, the College expect to have 2,050 students on site on a weekly basis (of which it would be expected at least 550 would be online learning) by 2035/6. They also anticipate an increase in job creation to 128 jobs by 2035/6.

6.9 The College is required to demonstrate financial security in terms of capital to ensure that any degree courses offered can be delivered over a number of future years to provide students with security and certainty of completing their respective degrees or courses. The College has indicated that the capital receipt from the land sale for proposed houses would provide a cross-subsidy to allow the College to reinvest in facilities and generate income from the site (from wider use of the buildings), ensuring a secure long-term future for the College.

6.10 The applicant has indicated that the expansion plan would provide a range of benefits, including increased quality and capacity of teaching facilities and supporting higher education in the borough, improved accessibility within the site and education buildings, new courses and students and jobs increase. In



addition, the College consider the expansion would enable increased community engagement and access including use of the multi-use accessible space outside of student uses allowing hire for individual, community and corporate activity across a range of rooms, halls, a new chapel and 3 lecture theatres. They anticipate that small scale community and church groups, conferences and graduations may take place on site together with opportunities for local schools to use it for informal and formal events. As part of their university title, the College are expected to engage further with local schools about the opportunities of Higher Education and they are currently in talks with Oasis Academy to provide access to the college for this purpose. Opportunities for use of the college for church events on Sundays is also being explored with potential for the site to be used for weddings and baptisms. The College is also exploring hosting a local forest school to use the campus to help local young people learn about nature, experiencing the benefits of outdoor classrooms. Access may also be provided for local groups such as youth scouts and cubs groups.

- 6.11 The site is not located in a sustainable location. It sits in a residential area, outside a town centre, is not close to other community facilities and the public transport accessibility is low (PTAL 2-3). Overall, officers feel that whilst a new education facility might not be considered appropriate in this location, the expansion of the existing facilities are supported in principle subject to other considerations. The proposed facilities would provide high quality education facilities with potential for wider use and engagement with the local community.
- 6.12 DRP raised concerns that the proposed development would not allow for continued expansion of the education facilities beyond the current plans as there is no opportunity on the site for further expansion. Officers have also queried whether this is the right location for this quantum of education provision or whether there is opportunity to provide facilities off campus, thus reducing the quantum of development required on the site. The College have confirmed that as part of their expansion plans, over the next 10 years, the College is seeking to become a 'collegiate university' which would mean that central administration would continue at the application site together with provision of courses but that there would be a number of 'constituent colleges' around the UK under the Spurgeon's University authority, effectively acting as satellite institutions across the UK and potentially internationally. The College have indicated that there is already one institution under the university authority and another is expected to be brought in from 2024 and there are further conversations taking place with yet another. This explanation goes some way in explaining how the university could continue to grow where it to outgrow the current expansion plans for the site but further integration is required as to the level of education facilities required on the site in the near future and whether it would be of benefit to explore off site education facilities in one of Croydon's District Centres.
- 6.13 The policy position which directs new university development to the Borough's District Centres and accessible locations is important to note, as it means that when considering the planning balance for the scheme as a whole, the benefits arising from the expansion of the education facilities must be weighed in the balance against other very important policy expectations for a development of this type and any harm caused by the scheme. As noted below, no affordable

housing is currently proposed and officers have significant concerns with regards to the impacts of the scheme on protected trees. Given this, officers do have significant concerns with the extent to which the scheme would fall short of meeting other policy expectations. Whilst the scheme would provide benefits to the local community, officers are of the view that these benefits would not currently outweigh the harm caused and further amendments (and/or reduction in the scheme) are required to address these concerns. Should an application be submitted which does not overcome officer's concerns, this would need to be carefully assessed and the balance weighed up after detailed consideration of the proposals.

*Residential – principle, housing mix and affordable housing*

- 6.14 The proposal includes 42 houses (all of which are intended for sale on the open market). The site is not currently allocated within the Local Plan, however the development would contribute to the Borough's strategic housing targets. The provision of housing on the site is therefore supported in principle subject to assessment of other material consideration. Local Plan policies SP2 and DM1 seek to secure the provision of family sized housing in the borough. Policy DM1 sets out a site specific target for 60% of the new homes in this area to be family accommodation (3 bedrooms or larger) and DM1.2 also seeks to ensure that there is no net loss of existing 3 bedroom properties or properties under 130sqm. It would appear that the 'Principal's house' falls into this category. All 42 of the proposed houses would be 3 or 4 bedroom family homes and there would be no net loss of family houses which is supported by officers as is a benefit of the housing scheme (in contrast to previous flatted schemes which struggled to provide more than 11% family accommodation).
- 6.15 Policies SP2.4 and SP2.5 of the Croydon Local Plan seek to negotiate up to 50% affordable housing, subject to viability with a tenure mix of 60/40 in favour of affordable rented homes to intermediate homes, and also require a minimum provision of affordable housing to be provided, preferably in the first instance as a minimum level of 30% affordable housing on-site. Policies H4, H5 and H6 in the more recently adopted London Plan set out a strategic target for 50% of all new homes to be genuinely affordable, set out a threshold approach for major development proposals, where schemes providing a minimum of 35% affordable housing can follow the 'Fast Track Route' whereby they are not required to submit viability information (subject to meeting a number of other specified criteria), and set out a tenure split requirement (within the affordable element of a proposal) which requires a minimum of 30% of said homes to be low-cost rented homes, a minimum of 30% of said homes to be intermediate products which meet the definition of genuinely affordable housing, with the remaining 40% of said homes to be determined by the borough as low-cost rented or intermediate products based on identified need.
- 6.16 The applicant has provided an initial viability appraisal for the scheme based upon roughly 4,800sqm of education floorspace and 42 houses. The viability appraisal has considered the scheme as a whole, based on provision of traditional market sale houses and concludes that the scheme would result in a deficit and it would therefore not be possible to provide affordable housing. The applicant has not yet provided a detailed breakdown of the viability position

including supporting evidence to justify the assumptions, inputs and details of the appraisal. The initial viability position has been independently reviewed and there are various areas within the appraisal that the independent viability consultant has flagged as needing more information and interrogation. Overall, the independent viability consultant's initial conclusion was that the scheme could provide a profit and therefore there was an opportunity to provide affordable housing.

- 6.17 In particular, questions have been raised with regards to the gross development values, construction costs and benchmark land value. These mean that there is a significant difference in the appraisal outcomes from that put forward by the developer and that suggested by the Council's independent assessor.
- 6.18 The Council's independent consultant has also undertaken sensitivity testing with regards to increasing and decreasing residential values and construction costs which still provide a surplus for the scheme, in contrast to the information submitted by the developer.
- 6.19 In addition, officers had requested that the applicant review how the viability is impacted by the construction of the below ground (basement) education space. The applicant has undertaken a review of the impact of delivering the same quantum of education floorspace all at grade (without a basement) which the applicant has indicated would result in the reduction in residential delivery to 21 homes. Whilst there is some disagreement as to the method the applicant has used, the independent consultant has run a high level appraisal based upon 21 residential units and above ground education floorspace, they agree with the applicant that this would have a detrimental impact upon the viability (albeit that it would still appear to result in a profit). This sensitivity testing requires more detailed analysis as it is dependent upon the value of the proposed education floorspace which is an area where the independent consultant has requested more evidence. In addition, this sensitivity testing may need to be expanded upon to review the viability impacts of the basement and development layout on protected trees and Biodiversity Net Gain (BNG). These other aspects of the scheme could have significant cost implications for the applicant. Delivery of off-site biodiversity net gain is expected to be significantly more than on-site delivery and replacement rather than retention of about 80 trees is also considered to be a potential cost to the scheme.
- 6.20 The independent consultant has also questioned whether there are other funding streams for delivery of the education facilities. The applicant has indicated that if they are not able to realise the residential development and education expansion plan they may have to consider leaving the site and possibly the borough to enable their expansion elsewhere.
- 6.21 Officers note that the review undertaken has not been underpinned by detailed analysis of the justification and evidence to support assumptions and inputs which has not yet been provided by the applicant team. This will need detailed review going forward but the initial review has suggested that the scheme would provide a surplus suggesting that the scheme could provide some affordable housing. As the scheme progresses, and as part of any future planning

application, officers will seek to secure the maximum level of affordable housing delivery on the scheme.

- 6.22 Given the interplay between the delivery of residential development to financially enable the provision of the education facilities, it is considered likely that the phasing and delivery of the expanded education facilities would need to be secured within a s106 agreement.

## Trees

- 6.23 Policy G7 of the London Plan sets out that development proposals should ensure that, wherever possible, existing trees of value are retained, and that where it is necessary to remove trees adequate replacements should be provided. Policies DM10 and DM28 of the Croydon Local Plan seek to retain existing trees and do not permit developments that result in the avoidable loss of preserved or retained trees where they make a contribution to the character of the area.

- 6.24 The site is partially covered by woodland to the rear portion of the site, and this woodland character extends along both the north west and south eastern boundaries of the site. This woodland character is a key character of the site and the trees along the boundaries provide the added benefit of providing a green outlook and buffer for neighbouring properties surrounding the site. Whilst the site is not highly visible from the streetscene, the tree line along the boundary with Wharncliffe Gardens and Grange Gardens is visible within each of these streetscenes and the initial approach from South Norwood Hill is tree lined, with the access road opening to a clump of mature trees to the centre of the car park. The trees on the site are a mixture of high-quality trees (with a large proportion of category A and B trees on the site). The majority of trees on the site are protected under a woodland Tree Preservation Order.

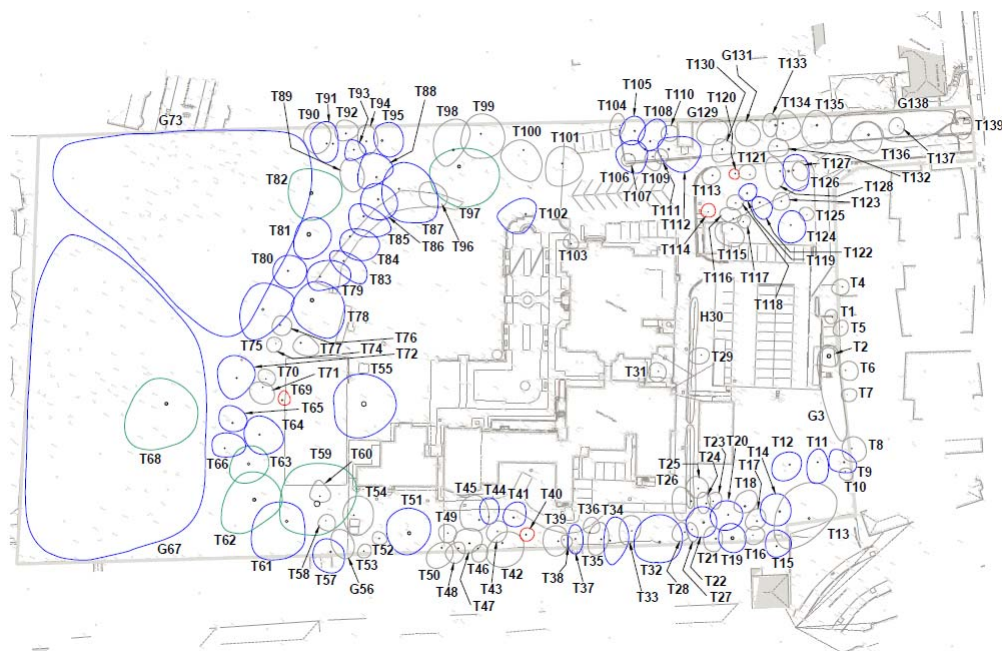


Figure 10: Existing Tree plan based on survey work from February 2023 (Category A trees in Green, category B trees in blue, category C trees in grey and category U trees in red).



6.25 The scheme would result in the loss of roughly 80 trees from the site including high quality category B, protected trees. In addition to the loss of a high number of trees, the development is also considered to result in a poor relationship with retained trees which would result in post development pressure (as a result of large trees in small proposed gardens), loss of habitats, loss of privacy screening and dismantling of woodland structure. The scheme overall is currently considered to have a negative impact upon the existing trees which would be contrary to the planning policies which requires retention of trees which make a positive contribution to the character of the area.

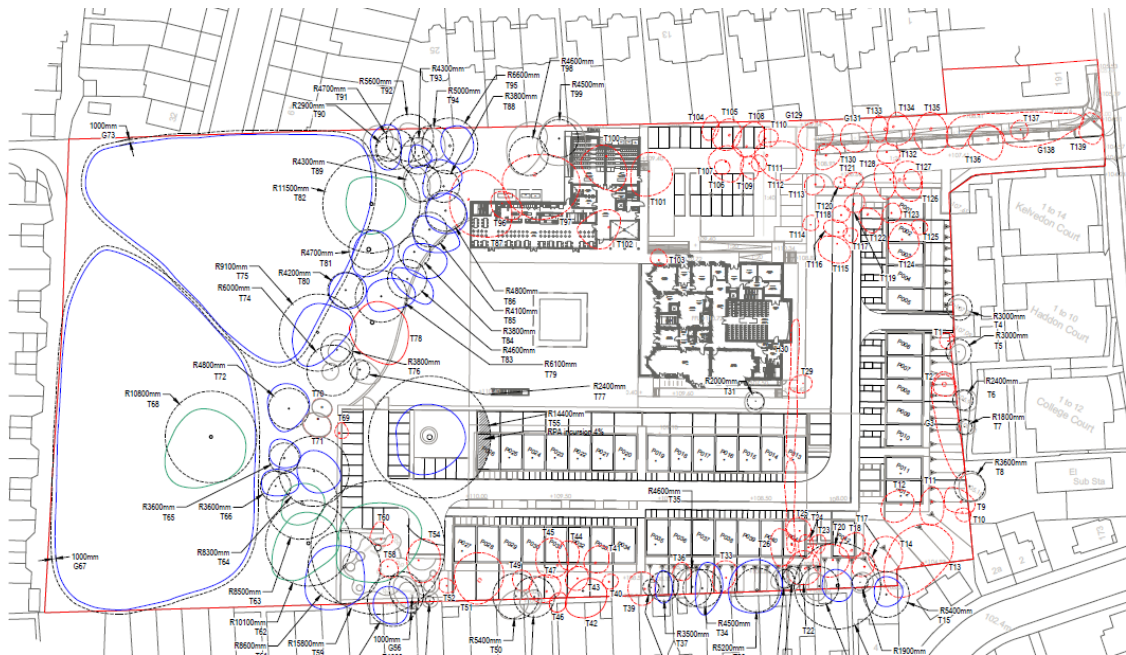


Figure 11: Tree removal plan (based on scheme from Oct 2023) showing removal of 80 trees.

6.26 Officers have an overarching concern with regards to the number of trees to be removed; in addition specific concerns with various parts of the proposal which have been broken down to the different aspects of the scheme: a) tree loss along the access road and car park, b) tree loss and harm caused by the TJ building, c) impact of development upon two of the most prominent high quality trees on the site (a category A Oak Tre (T59) and Horse Chestnut (T55), d) loss of trees and harm to trees along the south-eastern boundary.

#### Access Road and car park tree loss

6.27 The applicant has indicated that the removal of trees to the access road and car park area is required to facilitate disabled (DDA compliant) pedestrian access into the site and across the arrival area. The access arrangements would be delivered through removal of the steps along the access road and provision of a ramped entrance from land that currently forms the curtilage of the adjacent house. The introduction of a new ramp would require removal of all of the trees along the access road and at the top of the ramp, the two groups of trees in the existing car park would be removed to facilitate the delivery of a new road to the residential development, houses and the lowering of land levels in the car park to provide level access and vehicle circulation (land levels appear to be dropping

by about 1m). The key concern in this area is the removal of a high quality group of category B trees within the main car park (trees T104 – T112). The trees are in good condition and form a cohesive group and should be considered for retention within the proposed scheme. Whilst officers support the delivery of disabled and high-quality pedestrian access into and across the site, the current approach would result in significant engineering operations to alter the existing land levels, lowering the existing car park outside the main entrance of Walker House by roughly a 1m. The applicant is encouraged to test alternative layouts and arrangements to achieving pedestrian and disabled access into the site and provide further detailed justification for the final design. The existing trees here and to the access road are also considered to provide a visual and noise buffer for neighbours which will also be lost with their removal although replacement planting is now proposed within the car park along this boundary. Overall, the quantum of trees proposed to be removed in this area is considered excessive and contributes a large number of trees to the total number of trees to be removed as part of this scheme.



Figure 12: plan of trees T104-112 to be removed

### *Thomas Johnson Building*

- 6.28 The proposed footprint of the Thomas Johnson building would require removal of a number of high quality TPO trees and would impact upon others. The trees in this location (T96 – T102) are considered to be of high value, particularly a large Oak tree (T97) which is a category A tree. In various versions of the scheme, this tree (located to the inner corner of the 'L' shaped building) is shown to be removed, but the applicant is seeking to retain the tree (without making significant alterations to the footprint of the building). It is anticipated that TPO tree roots extend beyond, and into the area for the proposed footprint, therefore the applicant is undertaking soil investigation to determine root presence.

However, if roots are discovered it will indicate the unsuitability of the position and footprint of the TJ building. It is also noted that the existing tree line in this area forms an extension of the woodland structure, and the loss of trees would deplete the woodland and reduce its historic value and biodiverse habitat and would remove trees which currently provide screening for neighbouring residents.



Figure 13: relationship between TJ building and adjacent trees

#### *Impact on prominent Horse Chestnut and Oak (T55 and T59)*

- 6.29 The construction requirements for the proposed parking (in the southern most corner of the development) and play areas beneath the trees are generally considered acceptable. The removal of the old tennis court would need to be undertaken sympathetically with arboricultural supervision. The provision of protection measures such as root bridges or cellular confinement systems is recommended by officers and no excavation below existing land levels in this area would be supported. Whilst there is a 4% incursion into the tree protection area of the Horse Chestnut tree (T55), officers consider that this level of incursion could be accepted subject to arboricultural supervision. Officers have also recommended that the root area for the trees should be modified to better reflect the obstruction from the existing dwelling in proximity to the trees.





*Figure 14: Horse Chestnut with Oak tree in background*

### *South Eastern Boundary*

- 6.30 The location of the proposed houses along the south eastern boundary results in the need to undertake excessive tree removal to facilitate the quantity of units. A small number of existing trees would be retained, however, at a recent site visit, officers noted a historic mound which runs parallel to the south eastern boundary which if requires levelling for the gardens would require excavation within the root protection areas of the TPO trees which could lead to detrimental health impacts to the quality of the trees if tree roots are present. Moreover the very close proximity of trees within the compact rear gardens are considered to dominate any reasonable enjoyment of the available garden space, dominating natural sunlight. It is therefore considered that the retained trees are likely to come under significant post-development pressure. Finally, the trees along this boundary provide a useful screening for residents backing onto the site along Wharncliffe Gardens and without this screening the proposed development will appear more overbearing upon these neighbours. It is worth noting that the recent site visit noted a large tree (T14) in very poor structural condition which officers have recommended be removed immediately and removal of a partially failed tree and it is expected that this work will take place imminently.



*Figures 15: showing the prominence of the tree line along the south eastern boundary*

- 6.31 Officers have significant concerns with regards to the loss of trees to facilitate the proposed development. The concerns have several layers including:



- the high number of good quality trees to be removed to facilitate development is considered to be contrary to the London Plan and Local Plan policies.
- Several highly visible category A and B would be impacted by the development, through incursions into their root protection areas and development in close proximity.
- the position of the proposed development is considered likely to give rise to significant post development pressure on the remaining trees particularly to the south eastern boundary of the site.
- Loss of visual screening along boundaries of the site

6.32 Officers consider that design changes and potential reduction in the scale of development is required to deal more sensitively with the tree constraints on the site. The applicant has suggested that in order to retain all or more trees along the south-eastern boundary, they would have to move the residential building line approximately 10m further north which would reduce the housing scheme by around 15-16 houses which would not be viable. Officers acknowledge the viability position, but suggest that this or alternatives should be tested further given the positive benefits of retaining trees (and other potential benefits of an alternative approach such as moving some of the education facilities to grade level which might reduce build costs and balance out the viability impact of a reduced number of homes).

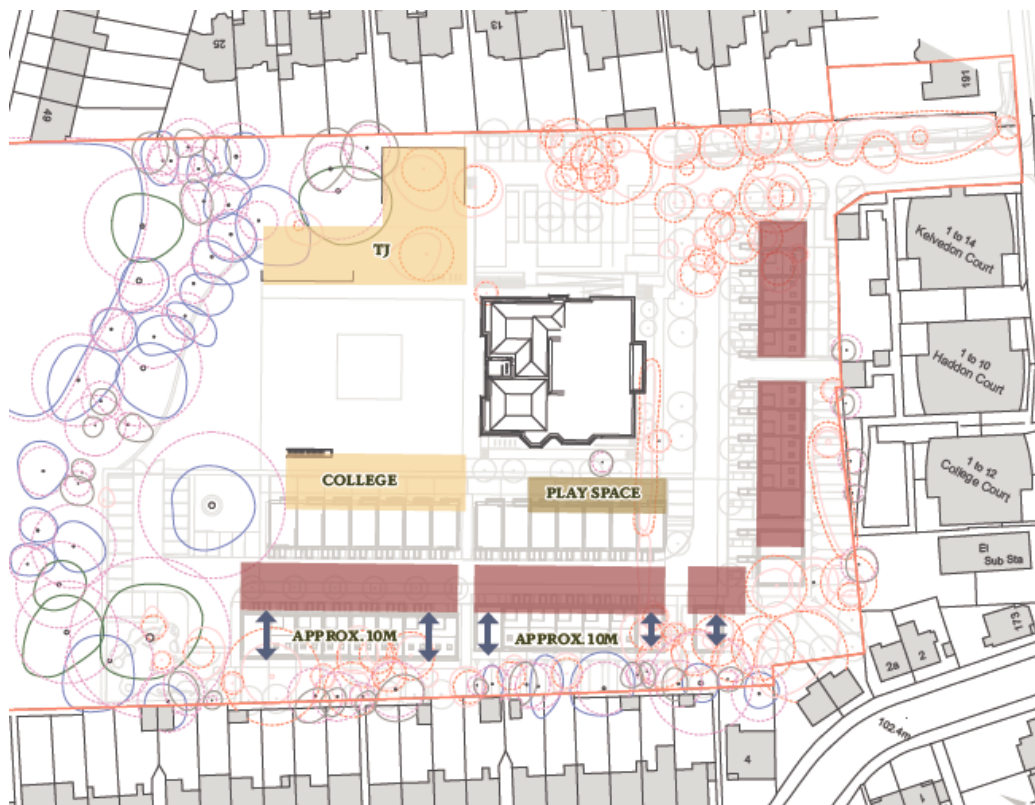


Figure 16: sketch of layout to improve the relationship with trees along the boundary

6.33 The applicant has proposed to replace the removed trees with roughly 110 new trees. Limited information has been provided with regards to this tree replacement strategy. New trees are proposed to the entrance route, within the

car park for the College, along the south eastern boundary and within the street scene along the rear of Walker House and in front of the new residential properties. There are concerns about the species, their location (in terms of the rigidity of their layout) and the quantum which need further resolution. The proposals are not considered sufficient to overcome the loss such a significant number of trees. Officers would welcome members views on this aspect of the scheme.

### **Townscape and Visual Impact**

6.34 Policies D1, D2, D3, D4 and D8 of the London Plan seek to ensure that development makes the best use of land by following a design-led approach that optimises the capacity of sites, enhances local context by delivering buildings and spaces that positively respond to local distinctiveness, are of a high design quality, and ensure that new public realm is well-designed, safe, accessible, inclusive, attractive, well-connected, related to the historic context, and easy to service and maintain. Further to the above policies HC1 and HC3 of the London Plan outline that development proposals affecting heritage assets, and their settings, should conserve their significance. Policies SP4 and DM10 of the Croydon Local Plan require development to be 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, respect the development pattern, scale, massing and appearance of the surrounding area, have high quality architectural detailing and provide landscaped spaces which are visually attractive, easily accessible and safe for all users. Policy DM14 of the Croydon Local Plan requires all major schemes to include public art. Policy DM18 of the Croydon Local Plan requires development to preserve and enhance the character, appearance and setting of heritage assets within the borough.

6.35 Throughout the previous pre-application discussions for a flatted scheme there were significant concerns with regards to design of the development, in terms of scale and layout, architectural design, landscaping and heritage. The proposed housing development in the current design is considered to be more sensitive and sympathetic to the surrounding context/suburban grain due to a reduction in scale and height, which is welcomed. The current scheme has overcome a large number of the previous concerns. However, officers do have outstanding concerns that the current scheme still results in some harm to the locally listed building and the design has not been refined to sufficient quality, to ensure that the new education buildings would create a legible, civic environment for students, nor provide a landscape-led residential development for residents.

### *Heritage*

6.36 The site formed part of the former Falkland Park. The main building of Spurgeon's College known as Walker House first appears on 1890 OS Map and is locally listed. The mass of the extension on the north-eastern section of Walker House also appears on 1890 OS Map. The remaining buildings on site consist of a Library, a Chapel and connecting buildings plus a Principal's house varying from 1 to 3 storeys in height. Walker House retains at least two architecturally significant elevations and a significant roofscape. Other elements are also of

historic interest in how the building has developed and been used over time. The landscape setting of the building and its relationship to the woodland on the site is important to its historic significance. DRP noted that the whole site should be considered as a parkland setting. It is acknowledged that later phases of building (which on the information provided do not appear to be of interest) have eroded some of its special interest and setting, nevertheless important aspects of architectural, historic and landscape interest remain.

- 6.37 Whilst the chapel and library are not statutorily or locally listed, they positively contribute to the setting of Walker House in terms of their mass and scale therefore, their loss should be justified with a high quality and characterful design that enhances the setting of the heritage asset. Given the scale, design and proximity of the proposed TJ building and residential buildings, the current scheme is still considered to result in some heritage harm although officers acknowledge that this scheme has less impact than previous schemes which were significantly larger and more dominant. Officers are working with the applicant to overcome the remaining areas of concern and have recommended that the footprint of the TJ building be amended to provide a large sky gap between it and the corner of Walker House and further design resolution to ensure that the buildings and extensions respond sensitively to the locally listed building, this is discussed in more detail below. Officers have also advised that details of the proposed demolition and construction (particularly the basement and rear extension) are required in order to record any uncovered historic features and ensure that the construction methods would not undermine the stability of the locally listed building.

#### *Site Layout & Landscaping*

- 6.38 The principle of the proposed landscape narrative set out by the applicant of 'homes among trees' is supported and aligns with the DPR feedback. This needs to be further emphasised in the site layout and landscaping design. Officers would encourage much more diversity of planting specification and landscaping across the site to help distinguish the two zoned uses and defined character areas. For example, a more informal natural landscaping could be utilised in the residential areas whilst the university area could have a more formal landscaped character. Given the concerns raised about trees, officers suggest that the woodland character needs to be more celebrated as part of the landscaping specification and design especially to the south eastern boundary of the site with less orthogonal, natural forms and planting bringing the woodland character through the 'perimeter mews'. Officers suggest that this should be achieved not just through trees, but clustering in more natural formations rather than the current uniform spacing of buildings and planting. The most recent iteration of the plans has started to address this better, in terms of providing a less rigid footprint which better relates to the topography of the site but officers would like to see this pushed further, and more detail is required to understand what benefits in terms of tree retention this design provides.
- 6.39 DRP felt very strongly that the scheme appeared 'car-led' in terms of public realm and suggested that this needed to be re-considered. Officers acknowledge that 1-1 parking is required on the site, therefore it is not possible to reduce parking to improve the public realm. However, further detailed design is required

for the landscaping proposals to ensure that the landscaping and planting to the front of homes is of suitable quantity, quality and variety, supporting the principle of 'homes amongst trees' rather than dominated by the parking layout.

- 6.40 The provision of play to the centre of the residential part of the site is positive and welcomed by officers, ensuring accessible doorstep play. Additional playspace and access to part of the woodland is also supported. Further details of the extent of access to the woodland and any boundary treatment between the two uses is required. Boundary treatment across the site needs to be carefully considered as part of integrated landscaping and public realm design, given the amount and scale of boundary fencing proposed. Soft landscaped boundary treatments are encouraged.
- 6.41 Improvements to the accessibility and legibility of the site is welcomed by officers, although further detail of the required excavation and land level changes are required and significant excavation or build up of land should be limited where possible particularly if it would enable more trees to be retained. Further details and testing is needed with regards to the entrance ramp design but improvements to the access route are welcomed by officers. Officers have encouraged the applicant to consider accessibility across the site in as much detail and consideration, and suggest further testing site layout, access, pathways and landscaping approaches through considering the experience of a child, especially in the residential area of the site, and the experience of a student as mentioned in the DRP.
- 6.42 With regards to the arrival experience, officers do have significant concerns with the elevated walkways to the front of the Walker House extension, Walker house and the TJ building. These currently contribute to an unwelcoming arrival experience by creating a visual barrier with steps, ramps and railings, separating the arrival space from Walker House, thus disrupting the legibility of the setting, and practical usability of entrances. The applicant has sought to improve the arrival experience through provision of landscaping, but this could be further improved and enhanced through a more integrated landscape design in the style of an amphitheatre steps to the corner of the arrival square. This approach would not only improve the setting of Walker House, visual appeal and legibility of entrances, but also provide students with a welcoming, civic space.
- 6.43 The site is set back from the road and the buildings are mostly not visible within the street scene of Wharncliffe Gardens, South Norwood Hill and Grange Gardens although the existing trees, particularly those along the south eastern boundary are highly visible between building gaps. The massing of the proposed houses in close proximity to the boundaries, together with tree removals mean that the development would be visible from the surrounding street scene in the gaps between houses. However, the scale and mass of the buildings is such that it would not appear dominant or out of keeping within the street scene.





Figure 17: View from South Norwood Hill (development highlighted in red)

### *Architectural design - Residential Blocks*

6.44 The residential development needs to mediate between the locally listed Walker House and surrounding suburban context. As part of this, the scale of massing of the development should also be informed by the surrounding suburban grain/plot sizes to ensure the proposals successfully reflect and enhance the prevalent suburban character of South Norwood. The design of the residential terraces has been split into two zones, College Green and Perimeter Mews with different designs for each. This is supported and recent design changes have given the two different zones a more defined character in terms of materiality and form. The form of the Perimeter Mews, with pitched roofs a less rigid form is more reflective of the surrounding suburban layout and design and is supported in principle subject to further design development. Further testing of this layout is needed to fully understand how the form and layout could bring further benefits of retaining trees and providing high quality amenity spaces.





*Figure 18: Residential terraces, detailed design*

- 6.45 The proposed flat roofs and a more formal design to the College Mews is supported but officers feel that the roof line for these terraces should follow the datum line set by Walker House and have a more formal quality to reflect their relationship with the locally listed building and TJ building in framing the lawn. Further design resolution is required to the elevational treatment and design to address this relationship, including detailed approach to the boundary treatment proposed between the rear gardens of the College Mews, and College Lawn.
- 6.46 Officers support the design approach to the treatment of the side elevation of the corner house at the entrance of the site and recommend that this approach be considered for other side elevations across the site, including the side elevation facing onto the play area. The woodland facing mews block could be supported but further detail is required to understand the prominence of the side and rear elevation from the new street scene and how suitable boundary treatment is designed.

#### *Architectural design - University buildings*

- 6.47 The proposal for below ground educational use is supported in principle as it reduces the above ground massing and would allow the opportunity for the educational buildings to be all connected. Further information is required with regards to the treatment of courtyard lightwell and balustrade treatments and environmental impacts of the basement.
- 6.48 As set out above, officers have significant concerns with regards to the massing and footprint of the TJ building in relation to its impact upon protected trees. In addition, there is some heritage concern that the proximity of the building to Walker House reduces the prominence of Walker House, thus it would not enhance the setting of the locally listed building. This is also a concern from a legibility perspective from the entrance courtyard, as the slender gap together with the railings and ramps limits permeability and views through to the woodland and green space and does not create a high-quality civic space on arrival at the entrance of the College. This entrance arrival is also undermined due to the design of the TJ building. Whilst the design has improved in the more recent iterations, officers consider the elevation of the TJ building facing onto the entrance courtyard (car park) still reads as a side elevation and does not positively frame the entrance space, providing a strong civic arrival space to the site. This was also highlighted by DRP. The applicant has tested introducing a chamfered corner to the building to widen the gap slightly. Officers are not convinced by this as it introduces a further angle to the building which is at odds with the rest of the design. Officers are also not convinced by the rationale that further setbacks are not possible based on current plans and internal space arrangement. Officers also note that the TJ building height appears to have

increased and no longer follows the datum line of Walker House which adds to its dominance against the locally listed building.



Figure 19: Images of Education extension to Walker House and TJ building

- 6.49 Officers suggest that further design resolution is required for the TJ building. The principal of a high-quality contemporary design could be supported, but the proportions of the building particularly in terms of irregularity of the vertical fin design and window fenestration currently lacks rationale and requires further testing. Officers feel that the spacing needs more proportional rhythm and it is unclear why the window positions have consistent spacing on some floors where others feature irregularity which lacks coherence. Officers have asked for precedents to understand and assess the proposed use of GRC cladding.
- 6.50 As it stands, the proposed rear extension to Walker House appears to correspond to the main house in terms of its mass and scale and proportions, therefore the design intent focusing on simplicity and subservience is supported which would allow Walker House to be prominent and appreciated at the arrival point. However, there are some areas that require further detailed design resolution. The testing of brick tones is positive, but the materials proposed for the set back link and roof extension (metal standing seam) are considered too industrial and solid and would be out of keeping with the design of the locally listed building. Officers have raised concerns with the window alignment at roof level and lower levels, particularly on the eastern elevation where they detract from the central cross feature. This central cross feature creates a focal point on the eastern elevation which enhances the visual amenity of residential units providing a front of house appearance to the elevation which is supported

however the window positioning disrupts the legibility of the cross as a focus feature. The applicant has sought to demonstrate that the windows at roof level would not be highly visible from the streetscene within the site, however, the misalignment would be read from the upper floors of the adjacent properties and wider streetscape. Officers note that the South eastern elevations for the extension have not been submitted to date. These have been requested to understand the visual impact of the extension upon the proposed College Mews houses. Officers have raised concerns that the two new university buildings – the TJ building and the Walker House extension, currently lack relationship to each other and have requested that there is some shared architectural language to ensure the university ‘campus’ overall reads as a cohesive collection of buildings.

### *Conclusion*

- 6.51 In principle the architectural approach to the development could be supported, however the architectural approach and quality does not overcome or outweigh the harm to protected trees and the impact on the locally listed Walker House is still to be resolved. Officers consider that the footprint and layout of both the education and residential buildings requires further consideration to improve the relationship with trees. Further resolution of the landscape and public realm design is also required. The residential building design is significantly improved since the initial submission but would benefit from further refinement. Officers consider that there is still further resolution required for the education buildings to ensure that these provide a high quality civic appearance which enhance the setting of the locally listed building.

### **Housing Quality for Future Occupiers**

- 6.52 Policy D6 of the London Plan states that housing development should be of high quality design and sets out a range of quantitative and qualitative aspects that new housing should comply with, including minimum internal space standards which are reflective of the Nationally Described Space Standards (NDSS) as well as minimum private external space standards. Policy S4 of the London Plan states that residential developments should incorporate good-quality, accessible play provision for all ages of at least 10sqm per child. Policies DM10.4 and DM10.5 of the Croydon Local Plan require new residential development to provide private amenity space that is of high-quality design, a minimum of 10sqm per child of new play space, as well as high quality communal outdoor amenity space that is designed to be flexible, multifunctional, accessible and inclusive. Furthermore, policy DM10.6 (d) of the Croydon Local Plan requires proposals for development to ensure that they provide adequate sunlight and daylight to potential future occupants.
- 6.53 Officers understand that all the proposed houses would either meet or exceed the National Technical Space Standards and are all being designed with outdoor amenity space in the form of private gardens. The internal layouts of the houses provide high quality spaces, and all of the houses would have dual aspect. As highlighted in the section above on Trees, officers do have some concerns about the useability and quality of some of the garden spaces, with the shortest gardens measuring 7m from the boundary with large trees either retained or proposed



within this small garden space. Officers have yet to be convinced that the gardens would provide high quality private amenity space.

- 6.54 Given the education use of the majority of the site, the applicant has confirmed that the residents of the new homes would not be able to have unfettered access to the education land, including the 'College Lawn' and wider woodland. A small section of woodland is expected to be provided for playspace and the College has indicated that there may be the possibility of limited access to the lawn outside of term times.
- 6.55 Officers have some reservations with regards to the living conditions for residents of the terrace backing onto the College 'lawn'. The properties will have 5m deep rear gardens with land levels sunken below the level of the College lawn. Further evidence is required to demonstrate how privacy would be maintained for residents, appropriate boundary treatment and how the two uses would interact successfully, especially given the outlook for residents over the 'College Lawn' to which they would not have daily access.

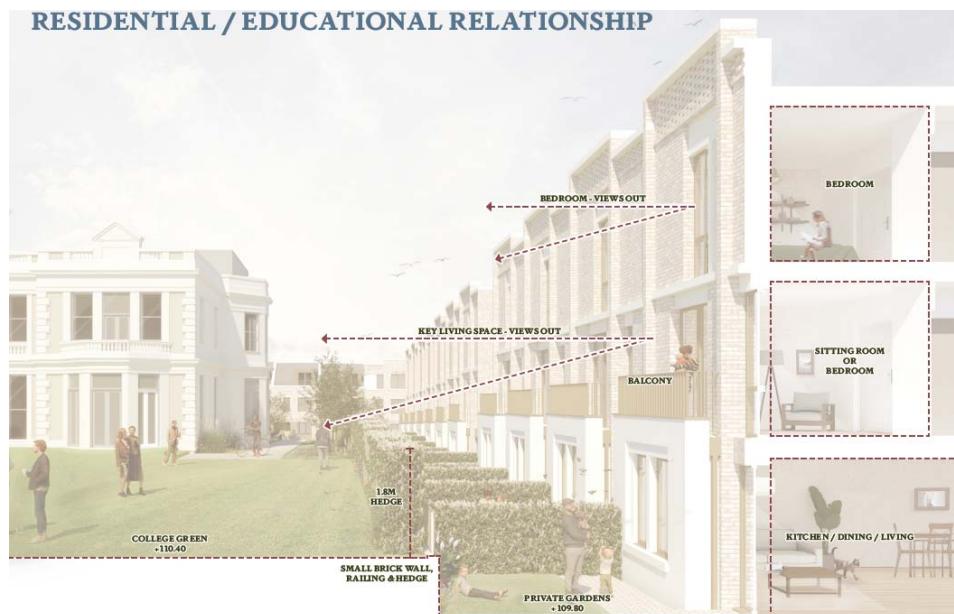


Figure 20: Relationship between houses and College

- 6.56 The properties adjacent to Walker House would be located a minimum of 10m from office windows within Walker House. The Local Plan sets out a rule of thumb guidance that suggests window to window distances of 18-21m should be a starting point between habitable room windows. The Walker House windows are not habitable room windows, as the rooms will be used as offices and meeting rooms. However, given the size of the windows, including large bay windows and the proximity of the two uses, officers are concerned that residents would not have sufficient privacy even with tree planting and land level differences.



Figure 21: relationship between Walker House and houses

6.57 In addition, a recent change to the plans have introduced a small row of terraces close to the woodland entrance. These would sit at right angles to the remainder of the houses. Local Plan policy DM10.6c states that in order to protect amenity of adjoining occupiers, development should not result in direct overlooking of private outdoor space within 10m perpendicular to the rear elevation of a dwelling. The end property on the terrace would overlook the rear garden of the end property on the main terrace and whilst the garden has been increased from 5m to 7m in depth, the relationship is still considered to give rise to concerns with regards to overlooking.

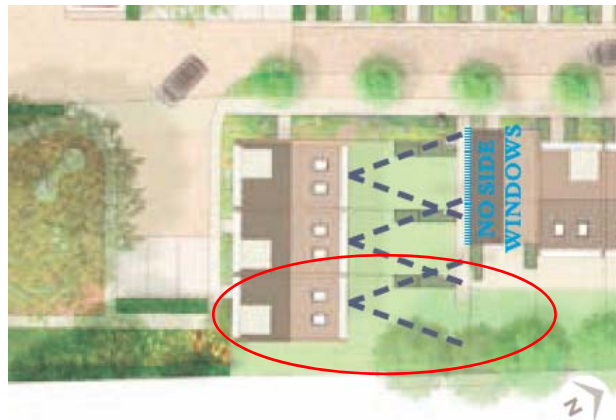


Figure 22: showing overlooking of garden

6.58 In line with the Local Plan policy DM10.5, the scheme provides on-site playspace in the form of a small play area to the centre of the residential street and additional playspace within the wooded area adjacent to the car park. For the current scheme (31x3bedroom and 11x4 bedroom homes) at least 224sqm is required and the site offers over 300sqm of playspace therefore the quantum of space is considered acceptable subject to high quality design. Officers are very keen to see high quality doorstep play for younger children at the centre of the scheme and the current location for this is supported subject to detailed design, layout and accessibility. The additional playspace within the woodland must also be designed with care given its location within the root protection zones of multiple high quality trees and limited natural surveillance.

- 6.59 Policy D7 of the London Plan states that at least 10% of new dwellings shall meet Building Regulation requirement M4(3) 'wheelchair user dwellings', with all remaining new dwellings meeting Building Regulation requirement M4(2) 'accessible and adaptable dwellings. It is clear from the floorplans of the houses that the design is considering Part M of the Building Regulations, however further detail is required to ensure that the designs are fully compliant and the M4(2) properties are accessible and adaptable. This level of detail is expected to be submitted as part of a planning application.
- 6.60 As stated above, officers support the DPR comments about reducing car dominance within the site and ensuring that the scheme is more landscape led. Further detailed design and information is required to demonstrate that the routes through the site for residents are legible and safe and provide a clear sequence of spaces. The current scheme provides a much better demarcation and understanding of education and residential spaces and shared spaces (between the residential development and university space). However, as noted in the DPR comments, one of the benefits of living on the site would be the 'parkland' setting and therefore officers feel that access arrangements for residents on university land need to be agreed and secured through a planning permission.

### **Impact upon Neighbours**

- 6.61 Policy DM10.6 of the Croydon Local Plan states that proposals for development will need to ensure that the amenity of the occupiers of adjoining buildings are protected; and that they do not result in direct overlooking of neighbouring properties nor result in significant loss of existing sunlight or daylight levels for adjoining occupiers. The Local Plan sets out the useful yardstick for achieving visual separation between dwellings by setting a minimum distance of 18-21m between facing homes.

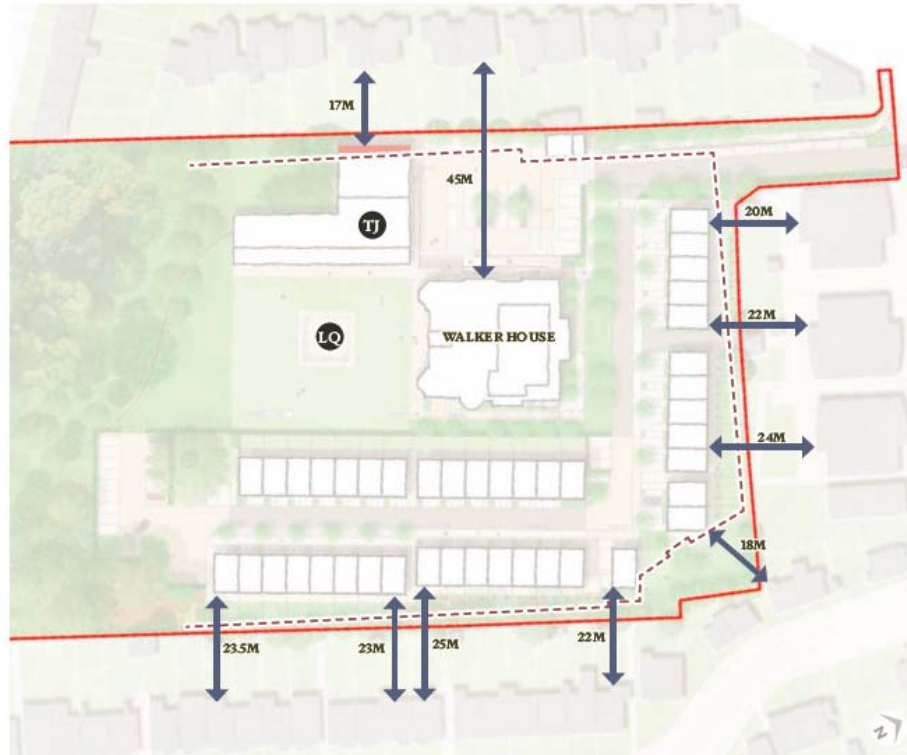


Figure 23: Distances between development and neighbours

- 6.62 The layout of the development means that it will introduce massing in close proximity to the boundaries of the site with South Norwood Hill, Wharncliffe Gardens and Grange Gardens. Figure 23 provides window to window distances for properties surrounding the site. The properties are 2-3 storey in height and the set on a higher land level. Generally speaking, the distances between the houses and the neighbouring properties is between 18-25m which is generally considered to protect residential amenity of neighbours subject to further details in terms of sections and daylight sunlight analysis. However, the existing tree line along the boundary with Wharncliffe Gardens provides screening for the residential properties and would continue to play an important role given that the footprint of the new houses close to the boundaries of the site. The removal of trees along this boundary (and potential for post-development pressure on remaining trees) is not supported as it would reduce the privacy for these neighbours.
- 6.63 The Thomas Johnson building would step down from 3 storeys at the front down to 2 storeys but the rear elevation would sit in close proximity to the boundary with no. 15 and 17 Grange Gardens. The proposed building would not have any windows in the rear elevation which would protect the privacy of these neighbours. The rear elevation would be roughly 17m from the rear windows of these properties at the closest, however due to land level changes, it would appear as a large blank elevation close to the boundary. The loss of trees in this location and the lower height of neighbouring properties would further affect the residential amenity of neighbours in this location, which is a concern. Further information is required to understand this relationship and design options should be explored to improve the relationship with neighbours in Grange Gardens.



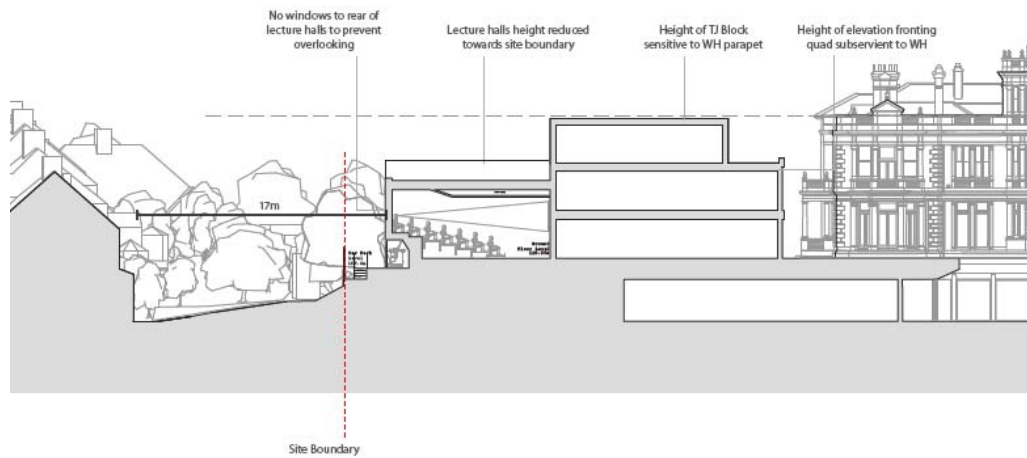


Figure 24: showing the relationship between the TJ building and properties on Grange Gardens

6.64 It is worth noting that previous development proposals for the site included large blocks of flats which whilst located further from the boundaries of the site with Wharncliffe Gardens, were 4-6 storeys in height. Officers had significant concerns with regards to these larger schemes in terms of overlooking, loss of privacy and loss of daylight and sunlight. In that respect, the current scheme is a significant improvement upon these past proposals.



Figures 25 : Examples of relationships between flatted scheme and neighbours

## Ecology and Biodiversity

6.65 Policy G6 of the London Plan states that development should manage impacts on biodiversity and aim to secure net biodiversity gain, whilst policies SP7 and

DM27 of the Croydon Local Plan seek development to incorporate biodiversity measures such as green roofs and green walls which enhance local flora and fauna and aid pollination locally. Finally, policy G5 of the London Plan states that major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design.

- 6.66 A planning application will need to be supported by adequate and up to date ecological surveys and assessments to enable officers to determine that the proposals submitted are in line with national and local policy and statutory duties. This will include likely impacts on designated sites (international, national and local), protected species and Priority habitats and species - not just significant ones. All surveys must be undertaken by suitably qualified ecologists at the appropriate time of year using standard methodologies. Effective and robust measures, in line with the mitigation hierarchy, must be also proposed which have a high degree of certainty for their deliverability in the long term. If there are residual impacts, these will need to be compensated for on site or offset and appropriate enhancements included to ensure that a Biodiversity Net Gain is demonstrated from the development. A preliminary ecological survey has been reviewed by the Council's ecology consultants who have recommended that an updated ecological report will be required for any future planning application as the original site walkover and bat survey were undertaken in summer and autumn 2022 with the results no longer valid after October 2023.
- 6.67 The site is not located within close proximity to any statutory designated sites and is therefore not within any Zone of Influence for these sites. The ecology report has identified that there are a number of Sites of Importance for Nature Conservation (SINCs) within two kilometres of the site. Two of which are in close proximity to the site. (Grangewood Park and Beaulieu Heights). Whilst the ecological survey confirms that the woodland on the site is to be retained, it does not address the fact the roughly 80 trees are proposed to be removed from the edges of the woodland and what the impact of this might have upon the non-statutory designated sites. Further consideration is therefore required as to the impacts and the ecological survey will need to be updated.
- 6.68 With regards to European protected species, the applicant has concluded that the site does not provide suitable habitat for Great Crested Newts (GCNs). It is recommended that this is reassessed as part of the updated assessment. Surveys were submitted with regards to bats, however these are out of date and the surveys themselves were constrained. The ecological report should update the Preliminary Roost Assessments of the existing buildings and the Ground Level Tree Assessment (GLTA) of the trees. Any updated ecological assessments should determine if updated surveys are required and if not clearly detailing the reasons why they are not required. Further clarity regarding why the buildings are not suitable for roosting bats will be required. It is indicated that the ecological assessment must include a GLTA of any trees which are proposed to be removed or modified on the site, to determine the likelihood of bats being present and affected. This assessment categorises the roosting habitats present and determines whether further surveys are required to determine the presence/likely absence of bats or to categorise a roost site. If further bat surveys are required, the results with mitigation will be required prior to the determination

of any planning application to allow officers to have certainty of the likely impacts on European Protected Species. In addition, if any external artificial lighting is proposed, a Wildlife Lighting Design Scheme may be required, in line with best practice guidance from Bat Conservation Trust and Institute of Lighting Professionals.

- 6.69 Further consideration and updated surveys are required with regards to UK protected species, to review badger activity on the site and potential reptile habitat on the site. Consideration must be given to nesting birds. With regards to priority species, hedgehogs have been observed on the site and suitable precautionary mitigation measures have been suggested. If priority habitat (such as woodland) is affected then appropriate considerations, in line with the mitigation hierarchy must be provided. Further details and clarifications should be provided as part of the updated ecology assessment and this should cross-reference the arboriculture reports to fully understand whether any of the trees, particularly the ones to be removed, are considered to be priority habitat.

#### *Biodiversity net gain*

- 6.70 Biodiversity Net Gain is development that leaves biodiversity in a better state than before (CIEEM, 2016). It is also an approach where developers work with local governments, wildlife groups, landowners and other stakeholders in order to support their priorities for nature conservation. The National Planning Policy Framework sets out that projects should provide biodiversity net gains, under paragraphs 180 [d] and 186 and London Plan G6 also aims at achieving a biodiversity net gain. Officers expect development will contain the provision of biodiversity enhancement measures and expect that the development should contain a range of enhancements, such as integrated bird and bat boxes, Hedgehog homes, Hedgehog friendly fencing and native, species rich hedgerow and tree planting.
- 6.71 This is a major residential development and therefore it will need to be supported by a Biodiversity Net Gain Assessment to demonstrate how it would achieve the Mandatory 10% Biodiversity Net Gain if a planning application were to be submitted on or after 12<sup>th</sup> February 2024.
- 6.72 The Biodiversity Net Gain Assessment should inform the soft landscape proposals. The applicant has provided an initial calculation of the Biodiversity Net Gain. The applicant's initial report suggests that they do not feel it is possible to provide 10% biodiversity net gain on site due to site constraints and they are therefore considering an off-site approach. Should the scheme seek to provide an off-site biodiversity net gain, it should be noted that whilst this would be secured through a legal agreement, it is highly likely that the scheme through which the net gain is achieved would not be in the area local to the site and possibly not within the Borough boundaries. Our ecology consultant has advised that in the first instance BNG should be sought onsite as much as possible through habitat enhancement and or creation. After which, if required then off-site compensation should be sought and secured by legal agreement.

#### **Transport**

- 6.73 Policies T1, T2, T3 and T4 of the London Plan seek to ensure that development proposals facilitate the delivery of the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041 and deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling, support capacity, connectivity and other improvements to the bus network, and ensure that impacts on the capacity of the transport network, including cumulative impacts of development, are fully assessed with mitigations through improvements or financial contributions. Policies T5, T6, T6.1, T6.3 and T6.5 of the London Plan seek to ensure that a suitable quantum and quality of car and cycle parking provision is provided within developments, including suitable provision of disabled persons parking. Policy T7 of the London Plan seeks to ensure that development proposals facilitate safe, clean and efficient deliveries and servicing and provide adequate space for deliveries and servicing off-street. Policy T9 of the London Plan sets out that planning obligations, including financial contributions, will be sought to mitigate impacts from development.
- 6.74 Policies SP8, DM29 and DM30 of the Croydon Local Plan require redeveloped sites to increase permeability, connectivity and legibility and require development to contribute towards the provision of electric vehicle charging infrastructure, car clubs and car sharing schemes, promote measures to increase the use of public transport, cycling and walking, have a positive impact and must not have a detrimental impact on highway safety and do not result in a severe impact on the transport network local to the site, as well as providing a sufficient level of car and cycle parking.
- 6.75 Should a full application be made it would need to be supported by a Transport Assessment including an ATZ to incorporate active travel improvements, Travel Plan, Delivery Service Plan, Waste Management Plan and Demolition/Construction Logistics Plan.

#### *Car parking*

- 6.76 The applicant has undertaken parking stress surveys in the surrounding streets both during the daytime and overnight. The surveys confirm that whilst there is some evidence of parking stress on South Norwood Hill, there was also found to be capacity on the surrounding streets for some overspill parking off site (roughly 20 spaces). A parking survey for the existing College car park confirmed that the existing parking provision was underutilised on the day of the survey (only 19 members of staff were noted).
- 6.77 For the residential element of the scheme, the London Plan maximum parking provision is 1:1 parking. The applicant has proposed to deliver the maximum number of parking spaces on site which is supported by officers, with some parking located to the front of properties and the rest within a parking area to the end of the access road. The M4(3) blue badge bays to the front of the houses requires some further design resolution to ensure that they meet standards but otherwise parking layouts are generally acceptable from a highways perspective. In addition, it is expected that a financial contribution would be sought per dwelling towards sustainable transport improvements in the area.

- 6.78 For the education facilities 31 parking spaces are proposed to the main entrance quad which would be a reduction in spaces (from 76 spaces) despite the education use expanding on the site. The applicant has indicated that these will be provided for staff and disabled parking only, with students expected to travel to the site by public transport. To support this, the College is proposing to run a mini-bus shuttle from the main public transport hubs to the site. The principle of this is considered acceptable, however details would need to be secured by s106 agreement. Further evidence is required to demonstrate how the parking demand from the increase in student and staff numbers would be managed to ensure that it would not result in significant overspill parking in the local area. Further details of the parking requirements for large scale non-educational uses, such as conferences, community uses, weddings, baptisms and church events is required to understand the highway implication of these uses. Officers consider that in addition to the mini-bus, funding should be secured towards consulting on and implementing a controlled parking zone in the roads surrounding the site. Two car club spaces are also proposed located along the entrance road to the site. These will help to mitigate any highway impacts from the development.

*Access and delivery and servicing (and bins)*

- 6.79 The regrading and changes to the access road need further clarification. However, the road access across the site is generally considered acceptable. However, the road has been narrowed in the latest iteration, which is positive in that it allows more movement in the building line and deeper gardens to the south eastern boundary. However, there are now concerns about access for refuse vehicles. The road would need to be a suitable width for bin collections and emergency services. For emergency vehicles, including fire appliances, the minimum road width should be 3.7m which the road has been narrowed too. The Council's waste management team prefer wider roads that allow vehicles to pass each other (which would require the wider road of 4.8m/5m). The waste management for the site would be individual kerb-side bins although officers have encouraged the applicant to consider communal bins to reduce vehicle movements. There are also two bin stores for the adjacent flats on South Norwood Hill which back onto the current car park and access and servicing of these would need to be retained as part of the scheme. Further discussions are required with the applicant and waste management team to ensure that the narrower road width would be suitable for collections.
- 6.80 The anticipated delivery and servicing needs of the College have not yet been provided but it is expected that the waste management for the College would be operated by a private contractor. Further details will need to be submitted with regards to other delivery and servicing needs and to ensure that suitable facilities can be provided, such as loading bays where necessary to ensure that parking spaces and soft landscaping is not fettered by lorries/vans parking where they should not and to ensure that vehicles can safely manoeuvre into and within the site.

*Cycle parking*

- 6.81 Cycle parking must be provided in accordance with London Plan requirements for both residential and education provision. Cycle parking is generally provided



to the front of properties which would together with the bins result in some clutter. Provision of shared cycle storage has been recommended by officers to allow more space for planting to the front of properties and to ensure that parking for wider/adaptive bicycles can be provided. The current iterations of the plans provides a small communal store for 6 wider / adaptive bicycles but it is not clear whether this space is fully accessible. Cycle storage needs to be sheltered, secure, accessible, and attractive to use and should be designed in line with the TfL Cycle Design Guide. Visitor cycle storage for the residential element will be required to London Plan standards.

### **Environmental Impact, Sustainability & Flooding**

- 6.82 Policies SI 2, SI 3 and SI 4 of the London Plan require development to be net zero-carbon in accordance with the London Plan energy hierarchy with at least a 35% on-site reduction in carbon dioxide emissions beyond Building Regulation requirements with any remaining shortfall to be provided through a cash in lieu payment alongside considering whole life-cycle carbon emissions. Major development proposals should demonstrate through an energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the cooling hierarchy. Policy SI 5 of the London Plan requires development through the use of planning conditions to minimise the use of mains water, achieving mains water consumption of 105 litres or less per head per day, and policy SI 7 of the London Plan requires development to promote circular economy outcomes and aim to be net zero-waste. Policy SP6 of the Croydon Local Plan requires development to make the fullest contribution to minimising carbon dioxide emissions, and requires new build non-residential development of 500sqm and above to achieve a minimum of BREEAM Excellent.
- 6.83 The applicant is aware of the above requirements and has indicated that a range of sustainability measures are being incorporated into the development including passive design measures, energy efficient energy and heating generation as well as the provision of Air Source Heat Pumps (ASHP) and Photovoltaic Panels (PVs). As part of any future planning application a suite a necessary documents covering and demonstrating compliance with the above policies will be required.

#### *Flooding*

- 6.84 Policies SI 12 and SI 13 of the London Plan state that development should ensure that flood risk is minimised and mitigated, with any residual risk being addressed, and should also aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible through following the London Plan drainage hierarchy. Policies SP6 and DM25 of the Croydon Local Plan require development to be accompanied by a site specific Flood Risk Assessment, to utilise sustainable drainage systems to reduce surface water run-off and provide water treatment on site, and where relevant account for possible groundwater contamination in Source Protection Zones 1 and 2.
- 6.85 The site is located in Flood Zone 1 meaning that it is at a very low risk of flooding from rivers and the sea, and has very low surface water flood risk. Overall the

risks across the site as a whole are relatively low. It is expected that the proposed development will incorporate suitable Sustainable Drainage Systems (SUDs) and as part of any future application a detailed Flood Risk Assessment and Sustainable Drainage Strategy will be expected to be submitted and will be reviewed by the Lead Local Flood Authority (LLFA).

- 6.86 The rear of the site is located within a Source Protection Zone 2 (SPZ). The Environment Agency has defined SPZs, for groundwater sources such as wells, boreholes and springs used for public drinking water supply. These zones show the risk of contamination from any activities that might cause pollution in the area. The closer the activity, the greater the risk. The majority of development appears to be located outside of the source protection area but the applicant has been advised to consider the risk of possible groundwater contamination from the construction period and expanded use. Details of this are expected to be submitted and reviewed by the Environment Agency.

### **S106 Obligations**

- 6.87 At this stage it is envisaged that planning obligations will be required to mitigate the impacts. Discussions have not yet taken place in relation to the heads of terms, but it is anticipated that these would include the following:

- Affordable housing (on site and including early and late stage reviews) – subject to the above.
- Agree a linked phasing to ensure that the residential development cannot be occupied without delivery of the education facilities
- Employment (end user) and Construction training (contributions and obligations)
- Air Quality improvements and contributions
- Zero carbon off-set contribution
- On site car club provision and membership
- Travel Plan
- Sustainable transport contributions
- Mini-bus transportation from transport hub for students to be secured
- Financial contribution towards implementation of a CPZ in the surrounding roads
- Tree specifications and planting plan (including costing)
- Biodiversity net gain (at least 10%)
- Access arrangements for residents to be agreed
- Public access and use programme to be secured

## **7 SPECIFIC FEEDBACK REQUESTED**

- 7.1 In view of the above, it is suggested that members focus on the following issues:
1. Whether the quantum of development is appropriate particularly in the context of loss of trees and impact upon remaining high quality trees, the impact of the massing on the locally listed building and residential quality of accommodation and neighbours.

2. The approach to significant expansion of the education facilities and impacts of this on the viability and provision of affordable housing
3. Biodiversity Net Gain: Provision of off-site (possible out of borough) contribution to biodiversity net gain and loss of 79 trees
4. Design approach and elevation treatment, including materiality and public realm, particularly for the education buildings and the entrance arrival and experience of both students and residents on the site
5. Relationship between the residential and education facilities and access arrangements for residents across the site.
6. Transport arrangements, whether the approach to education parking, provision of mini-bus and other transport improvements is suitable for this location