

1 SUMMARY OF APPLICATION DETAILS

Ref: [17/02696/FUL](#)
 Location: 28 – 30 Fairfield Road
 Ward: Fairfield
 Description: Demolition of existing buildings and the erection of part four/ part six storey building with basement comprising 11 one bedroom, 10 two bedroom 12 three bedroom and 1 studio flats: formation of vehicular access and provision of basement parking, provision of associated refuse and cycle storage (amended description)
 Drawing Nos: S101A ; S102A ; S103 ; P101F ; P102F ; P104F ; P105F ; P106F ; P110G ; P111F ; P112F ; P113F ; P114F ; P115F ; P116F ; P118A ; P120F ; P124A.
 Applicant: Montreaux Ltd
 Agent: OSP Architceture
 Case Officer: Dean Gibson

Type : Flats	Market	Affordable Housing		No. of Persons
		Affordable Rent	Shared Ownership	
Studio	1	0	0	1
1 bed/2 person	8	0	3	22
2 bed/3 person	5	0	1	18
2 bed/4 person	3	0	1	16
3 bed/5 person	10	0	2	60
TOTAL	27	0	7	117

Number of car parking spaces	Number of cycle parking spaces
13 (Includes 4 disabled spaces)	56

1.1 This application is being reported to Planning Committee because the total number of resident objections received exceeds the threshold of officer delegated authority and in accordance with the Committee Consideration Criteria it is therefore reported for Consideration by the Planning Committee.

2 RECOMMENDATION

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

- A. The prior completion of a S106 legal agreement to secure the following planning obligations:

- a) Affordable housing provision to include 7 residential units (20% of units / 20% of total habitable rooms) being shared ownership;
- b) Affordable housing review mechanism and nominations agreement (early and late stage review mechanisms in accordance with the Mayor of London Affordable Housing and Viability SPG 2017);
- c) Carbon off set financial contribution of £41,400
- d) Car club provision / monitoring
- e) Restriction on residential car parking permits (with exception of blue badge holders)
- f) Air quality financial contribution of £3,400
- g) Local Employment and Training Strategy and Employment and associated financial contribution of £18,750
- h) Tree works financial contribution of £7051 payable to Transport for London (for loss of tree from Fairfield Road)
- i) Highway works: S278 agreement with local planning authority required for highway works to rear.
- j) Highway works: S278 agreement with Transport for London for re-instatement of full kerbs in place of redundant dropped kerbs on Fairfield Road, public realm hard and soft landscaping works directly in front of the site on Fairfield Road. Provision for tree replacement, grass verge replacement, and highway surface works of making good.
- k) Monitoring fees (in accordance)

2.2 That the Director of Planning and Strategic Transport has delegated authority to negotiate the detailed term of the legal agreement, securing additional/amended obligations if necessary.

2.3 That the Director of Planning and Strategic Transport has delegated authority to issue the planning permission and impose conditions [and informatives] to secure the following matters:

Conditions

- 1) Time limit of 3 years
- 2) In accordance with approved plans
- 3) Full details of materials, including samples, and design detail
- 4) Typical façade details at 1:10
- 5) Details of hard and soft landscaping including children's play area
- 6) Submission to local planning authority of Tree Protection Plan/Method Statement for trees identified as T1, T8 and T12 (shown on drawing 17115/TCP/01 submitted in arboricultural report). Once approved, in and consultation with relevant highway

authority (Transport for London) for Fairfield Road with regard to trees T1 and T12, the Tree Protection Plan/Method Statement is to be implemented as specified for the duration of demolition and construction works associated to the development.

7) Submission to local planning authority for its written approval of a detailed Tree Planting Scheme in association with submitted arboricultural report. Once approved, in and consultation with relevant highway authority (Transport for London) for Fairfield Road, the new trees are to be planted prior to the first occupation of the new dwellings.

8) Proposal for the treatment of any gates proposed for the basement access

9) 10% of the dwellings shall be designed to be Category 3 'Wheelchair user dwellings'

10) 90% of the dwellings shall be designed to be Category 2 'Accessible and adaptable'

11) A Stage 1 / Stage 2 Road Safety Audit pertaining to means of vehicular access to the site to be submitted to local planning authority for its written approval prior to commencement of development.

12) Plans showing vehicle tracking movements and vehicle egress to and from the proposed vehicular access to the site serving Fairfield Road shall be submitted to the local planning authority for its written approval prior to the commencement of the development. The vehicular access is to be implemented as specified and approved before the first occupation of the new dwellings.

13) Prior to the commencement of the development the developer shall enter into Highway Agreement(s) with the relevant highway authority (Transport for London) to secure the removal of the redundant crossovers directly in front of the site on Fairfield Road and restore the dropped kerbs to full kerbs. The agreed works shall be only be implemented in accordance with such approved details prior to the first occupation of the new dwellings.

14) Prior to the commencement of the development the developer shall enter into Highway Agreement(s) with the relevant highway authority (Transport for London) to secure the necessary public realm hard and soft landscaping works directly in front of the site on Fairfield Road. The agreed works, including any tree replacement, and/or grass verge replacement, and/or highway surface works of making good shall only be implemented in accordance with such approved details prior to the first occupation of the new dwellings.

15) Submission for approval of visibility splays to vehicle entrance.

16) Provision of cycle parking and disabled resident parking prior to first occupation of new dwellings

17) Provision of electric and passive vehicle charging points

18) Submission of details of the car club

19) Details of refuse collection arrangements

20) Detailed Construction Logistics Plan (to include site waste management plan) and Construction Environment Management Plan

21) Submission of and compliance with detailed Travel Plan.

22) Submission of Delivery and Servicing Plan

23) Photovoltaic panel details to be submitted

24) Noise standard compliance for living rooms and bedrooms

25) Submission of air quality Low emission strategy

26) Secure by Design

27) Petrol and oil receptors provided in car park areas

28) Submission of biodiversity enhancements

- 29) Submission of sustainable urban drainage strategy (detailing any on and/or off site drainage works)
- 30) Water consumption
- 31) Any other planning condition(s) considered necessary by the Director of Planning and Strategic Transport

Informatives

- 1) Development is CIL liable
- 2) Construction site code of conduct
- 3) Thames Water informative
- 4) Subject to a legal agreement – S106
- 5) Subject to highway legal agreement/s – S278 Local Planning Authority
- 6) Subject to highway legal agreement/s – S278 Transport for London
- 7) Any other planning condition(s) considered necessary by the Director of Planning and Strategic Transport.

2.4 That, if by 8 May 2018 the S106 legal agreement has not been completed, the Director of Planning and Strategic Transport has delegated authority to refuse planning permission.

3 PROPOSAL AND LOCATION DETAILS

Proposal

3.1 The application seeks permission for the following :

- Demolition of existing dwelling houses (No.'s 28 and 30 Fairfield Road and associated outbuildings).
- Erection of 4 to 6 storey building facing Fairfield Road and comprising 34 flats with associated landscaping and boundary treatment.
 - 12 x 3 bedroom flats
 - 10 x 2 bedroom flats
 - 11 x 1 bedroom flats
 - 1 x Studio flat
- Provision of basement parking for 13 cars (including 4 disabled spaces).
- Provision of cycle storage in basement (56 cycles).
- Provision of refuse storage to the rear (collection from The Avenue).

Site and Surroundings

3.2 The site comprises two adjacent detached two storey dwellings houses at 28 and 30 Fairfield Road respectively, which face north onto Fairfield Road. The house at No. 30 has an irregular plot shape and a flank elevation that faces east towards Park Hill Road. The southern and eastern boundaries of the application site are screened to an extent by mature trees and hedges. A Copper Beech tree on the

southern boundary of 28 Fairfield Road is protected by a Tree Preservation Order. To the south of both houses is a public footpath which connects between Park Hill Road to The Avenue. Both dwellings have rear gardens laid to lawn and have respective hard surface forecourts with informal off-street parking arrangements. Both forecourts are entered/exited from Fairfield Road.

- 3.3 The existing row of detached houses that comprise No's. 24 to 30 Fairfield Road have an Arts and Craft/Mock Tudor style. The dwelling at No. 24 has a recent back garden development granted in the form of two/three storey contemporary detached building comprising 6 flats and which fronts The Avenue. 28 Fairfield Road is bounded to the west by a two storey detached dwelling at 26 Fairfield Road.
- 3.4 In the wider area there are four storey late twentieth century blocks of flats evident on Park Hill Road, Chepstow Road, and The Avenue. Opposite the site Turnpike Link is a Wates style housing estate.
- 3.5 Fairfield Road has dual carriageways and is classified as a Red Route. The site is within an Archaeological Priority Zone and a designated area of High Density.

The Planning History

28-30 Fairfield Road

- Ref: 16/04891/Pre Pre-application enquiry – demolition of existing dwellings ; Erection of 4 to 6 storey block of flats comprising 36 flats and provision of basement parking.

30 Fairfield Road

- Ref: 15/05542/P for demolition of existing buildings and erection of three/four storey building containing 8 two bedroom and 1 three bedroom flats; formation of access; provision of associated parking, cycle storage and refuse storage. **Granted planning permission (not implemented) - 15/02/16**

24 Fairfield Road

- Ref: 15/00548/P for erection of a two/three storey building at rear (fronting The Avenue) to provide 5 x two bedroom and 1 x studio flats; construction of bin store/cycle store **Granted planning permission (under implementation) 18/05/15.**

26 Fairfield Road

- Ref: 16/03224/P - Erection of two/three storey building at rear comprising 6 one bedroom flats **Refused planning permission 07/11/16**
- Ref: 16/06484/FUL- Erection of three storey building at rear comprising 6 x one bedroom flats, with associated cycle and refuse storage and landscaping **Granted planning permission 22/05/17.**

4 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- 4.1 There is no objection in principle to the proposal. A residential development is appropriate given the existing use of the site as residential accommodation, the character of the surrounding area and the significant housing demand within the Borough.
- 4.2 It is considered that the development would contribute positively to the surrounding townscape and its design is visually pleasant, well thought through and the materials and details of high quality. The proposal would sit comfortably within the context of the surrounding built up area and within the street scene and would be in accordance with design policies.
- 4.3 The proposed density would be 532 habitable rooms per hectare. The proposed housing density is therefore well within the density range outlined as normally acceptable in the London Plan. Given the context of this site, close to Croydon Metropolitan Centre, the density is appropriate.
- 4.4 The proposal would provide an appropriate mix of London Plan compliant units (12x3 bedroom ; 10 x 2 bedroom ; 11 x 1 bedroom) to meet a variety of demands across the Borough in accordance with Policy 3.8 of the London Plan.
- 4.5 All of the proposed units would meet the National technical housing standards in terms of overall size and bedroom size. All of the units would also meet the requirements as outlined in the Housing SPG in relation to amenity space quantum and minimum dimensions and would provide a good standard of accommodation.
- 4.6 The proposal would provide 7 affordable units all as shared ownership units (20% of total units) comprising 3 x 1-bedroom, 2 x 2-bedrooms , and 2 x 3 bedroom units. This offer has been subject to extensive viability testing and is considered to be the maximum reasonable level of affordable housing, which still allows the scheme to be financial viable and deliverable. This is less than the Council's policy aim, which is for 50% of units to be affordable. The applicant has agreed to undertake early and late stage affordable housing reviews being included in the legal agreement (so that increased levels of affordable housing could be secured if the development economics of the scheme improve). Given this and the constraints of the site, the proposed tenure is considered acceptable.
- 4.7 The proposed development would meet all relevant residential space standards and makes adequate provision for private and communal amenity space and play space. Adequate levels of daylight would also be provided within the flats for future residents.
- 4.8 Given the proposed design and positioning of the proposed development and the separation distances between proposed residential units and with neighbouring residential properties in Fairfield Road, The Avenue, Chepstow Road, Park Hill Road, and Turnpike Link, the proposal would not result in any

undue loss of outlook or privacy to the existing occupiers of neighbouring residential properties and to future occupiers of the development.

- 4.9 With suitable conditions (which are recommended) to secure mitigation, the development is considered acceptable with regards to its environmental impacts, specifically in relation to internal noise conditions, air quality impacts and flood risk.
- 4.10 The highways impacts of the development would be acceptable. 13 parking spaces would be provided at basement level including 4 disabled spaces to serve wheelchair users who may occupy the development and 56 cycle parking spaces in accordance with the London Plan's cycle standards. The Council's Highways advisor has raised no objection to the proposals.
- 4.11 The building would have a sustainable construction, meeting all of the relevant sustainability standards.

5 CONSULTATION RESPONSE

5.1 Transport for London (TfL) were consulted as Fairfield Road is a part of the Transport for London Road Network (TLRN). They had no in principle objection to the proposed development subject to issues related to road safety and public realm landscaping works being secured by conditions and/or legal agreements as appropriate and necessary. The issues identified are summarised as :

- Road safety audit prior to commencement of development to be agreed by TfL
- Specific details of vehicle entry/exit / egress movements to be agreed by TfL
- S278 agreement with TfL (including costs undertaking) for any associated works to highway resulting from proposed vehicle access
- S106 agreement to secure financial contribution of £7051 payable to TfL for loss of street tree (from Fairfield Road).
- Provision for replacement street tree for loss of street tree – details to be specified and agreed with TfL
- Tree protection scheme/method statement to be secured for two street trees in front of site on Fairfield Road
- S278 agreement with TfL for securing public realm enhancement works, including any tree replacement, and/or grass verge replacement, and/or highway surface works of making good
- Site-related car club space;
- Electric vehicle charging points;
- Provision of 56 cycle parking spaces
- Restriction of residential parking permits
- Submission for approval of a construction logistics plan
- Submission for approval of a delivery & servicing plan

5.2 These issues would be secured by the proposed schedule of conditions and/or through associated legal agreements.

- 5.3 Historic England (Archaeology) were consulted and had no archaeological requirement for the proposed development.
- 5.4 The views of the Planning Service are expressed in the MATERIAL PLANNING CONSIDERATIONS section below.

6 LOCAL REPRESENTATION

- 6.1 The application has been publicised by way of one or more site notices displayed in the vicinity of the application site. On the receipt of amended plans amendment site notices were also erected.
- 6.2 The number of representations received from neighbours, local groups etc in response to notification and publicity of the application were as follows:

No of individual responses: 16 Objecting: 16

- 6.3 The following issues were raised in representations. Those that are material to the determination of the application, are addressed in substance in the MATERIAL PLANNING CONSIDERATIONS section of this report:

Summary of objections	Response
Overdevelopment / Inappropriate Density	See paragraphs 8.4 to 8.10 below
Out of character with area / Too many flats in area	See paragraphs 8.26 to 8.33 below
Loss of light	See paragraphs 8.36 to 8.47 below
Loss of privacy	See paragraphs 8.48, and 8.58 and 8.59 below
Increased parking / traffic	See paragraphs 8.75 and 8.79 below
Road safety hazard	See paragraphs 8.76, and 8.78 to 8.80 below
Increased noise	See paragraph 8.66
Affect on trees	See paragraphs 8.71 and 8.72 below

7 RELEVANT PLANNING POLICIES AND GUIDANCE

- 7.1 In determining any planning application, the Council is required to have regard to the provisions of its Development Plan so far as is material to the application and to any other material considerations and the determination shall be made in accordance with the plan unless material considerations indicate otherwise. The Council's adopted Development Plan consists of the London Plan 2016

(consolidated with alterations since 2011), the Croydon Local Plan: Strategic Policies 2013 (CLP1), the Croydon Replacement Unitary Development Plan 2006 Saved Policies 2013 (UDP) and the South London Waste Plan 2012.

CLP1.1 & CLP2

- 7.2 The Partial Review of Croydon Local Plan: Strategic Policies (CLP1.1) and the Croydon Local Plan: Detailed Policies and Proposals (CLP2) was approved by Full Council on 5th December 2016 and was submitted to the Planning Inspectorate on behalf of the Secretary of State on 3rd February 2017. The examination in public took place between 16th May and 31st May 2017. Main modifications were received from the Planning Inspector and the Council consulted on these modifications during the autumn of 2017. The Planning Inspector concluded his examination in January 2018 and has found the Partial Review (CLP1.1) and the Detailed Policies and Proposals (CLP2) sound subject to a number of main modifications being made to them. The Council aims to adopt the Local Plan in early 2018.
- 7.3 Government Guidance is contained in the National Planning Policy Framework (NPPF), issued in March 2012. According to paragraph 216 of the NPPF, relevant policies in emerging plans may be accorded weight following publication, but with the weight to be given to them is dependent on, among other matters, their stage of preparation. Now that the Planning Inspector has concluded his examination of CLP1.1 and CLP2, there are certain policies contained within these plans that are not subject to any modifications and significant weight may be afforded. However, at this stage in the process no policies are considered to outweigh the adopted policies listed below to the extent that they would lead to a different recommendation.
- 7.4 The NPPF identifies a number of key issues for the delivery of sustainable development, those most relevant to this case are:
- Section 4: Promoting sustainable transport
 - Section 6: Delivering a wide choice of quality homes
 - Section 7: Requiring good design
 - Section 8: Promoting healthy communities
 - Section 10: Meeting the challenge of climate change, flooding and coastal change
- 7.5 The main policy considerations raised by the application that the Committee are required to consider are:
- 7.6 Consolidated London Plan 2016 (LP):
- 3.1 Equal Life Chances for All

- 3.3 Increasing Housing Supply
- 3.4 Optimising Housing Potential
- 3.5 Quality and Design of Housing Developments
- 3.6 Children's Play and Recreation Areas
- 3.8 Housing Choice
- 3.9 Mixed and Balanced Communities
- 3.10 to 3.13 Affordable Housing
- 5.1 Climate Change Mitigation
- 5.2 Minimising Carbon Dioxide Emissions
- 5.7 Renewable Energy
- 5.13 Sustainable Drainage
- 5.15 Water Use and Supplies
- 5.21 Contaminated Land
- 6.3 Transport Capacity
- 6.9 Cycling
- 6.13 Parking
- 7.2 An Inclusive Environment
- 7.3 Designing Out Crime
- 7.4 Local Character
- 7.5 Public Realm
- 7.6 Architecture
- 7.8 Archaeology
- 7.14 Improving Air Quality
- 7.15 Reducing and Managing Noise
- 7.19 Biodiversity
- 7.21 Trees and Woodland

7.7 Croydon Local Plan: Strategic Policies 2013 (CLP1) and Partial Review (CLP1.1) Proposed Submission 2016:

- SP2.1 Homes
- SP2.2 Quantities and Locations
- SP2.3 and SP2.4 Affordable Homes (and SP2.5 in CLP1.1)
- SP2.5 Mix of Homes by Size (SP2.7 in CLP1.1)
- SP2.6 Qualities and Standards (SP2.8 in CLP1.1)
- SP4.1 and SP4.2 Urban Design and Local Character
- SP4.7 Public Realm
- SP4.13 Archaeological Priority Zones
- SP6.2 Energy and Carbon Dioxide Reduction
- SP6.3 Sustainable Design and Construction
- SP6.4 Flooding and Water Management
- SP7.4 Biodiversity
- SP7.5 Productive Landscapes
- SP8.3 Pattern of Development and Accessibility
- SP8.6 Sustainable Travel Choice
- SP8.7 Cycle Provision
- SP8.12 Electric Vehicle Charging Points
- SP8.13 Car Clubs

- SP8.15 and SP8.16 Parking
- SP8.18 and SP8.19 Efficient and Clean Movement

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

- UD1 High Quality and Sustainable Design
- UD2 Layout and siting of new development
- UD3 Scale and Design of new buildings
- UD8 Protecting residential amenity
- UD13 Parking Design and Layout
- UD14 Landscaping
- UD15 Refuse and Recycling Storage
- UC5 Local Areas of Special Character
- EP1 – EP3 Pollution
- EP5 - EP7 Water – Flooding, Drainage and Conservation
- T2 Traffic Generation from Development
- T4 Cycling
- T8 Parking
- H2 Supply of new housing

7.9 Croydon Local Plan : Detailed Policies and Proposals Proposed Submission 2016 (CLP2)

- DM1 Housing Choice
- DM11 Design and Character
- DM14 Refuse and Recycling
- DM24 Sustainable Design and Construction
- DM25 Land Contamination
- DM26 Sustainable Drainage
- DM28 Protecting / Enhancing Biodiversity
- DM29 Trees
- DM30 Sustainable Travel
- DM31 Car and Cycle Parking
- DM37 Addiscombe

Relevant Supplementary Planning Guidance (SPG)

- SPG12 – Landscape Design
- SPG17 - Sustainable Surface Water Drainage
- London Plan Housing 2016
- London Plan Affordable Housing and Viability 2017

8 MATERIAL PLANNING CONSIDERATIONS

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

1. Principle of development

2. Density, housing unit mix and affordable housing
3. Townscape and visual impact
4. Impact on adjoining occupiers
5. Quality of living environment provided for future occupiers
6. Environmental impacts
7. Transportation, access and parking
8. Sustainability
9. Other planning Matters

Principle of development

- 8.2 At the heart of the National Planning Framework 2012 (NPPF) is a presumption in favour of sustainable development which meets social, economic and environmental needs.
- 8.3 Croydon Local Plan Strategic Policies (CLP1) Policy SP1.3 states that the Council will seek to encourage growth and sustainable development. The NPPF also attaches great importance to significantly boosting the supply of new housing. Policy 3.3 of the London Plan further seeks to increase housing supply across the Capital, with minimum housing targets being set out in Table 3.1. For Croydon, the London Plan sets a minimum target of 1,435 residential units per year in the borough over the period of 2015-2025.
- 8.4 The scheme would provide a net increase of 32 new units on a site, currently occupied by 2 dwelling houses. In principle, no objection is raised to the replacement of the existing houses with a flatted development. The core principles of the NPPF encourage the re-use of previously developed land. In light of the priority given to the delivery of a significant number of new dwellings the principle of the redevelopment of the site for a residential development is supported.

Density, housing unit mix and affordable housing

Density

- 8.5 Policy 3.4 of the London Plan states that taking into account local context and character, the design principles in Chapter 7 and public transport capacity, development should optimise housing output within the relevant density range shown in Table 3.2. Based on the public transport accessibility level (PTAL 6B) and the site's characteristics, the London Plan density matrix suggests a residential density of between 650 and 1100 habitable rooms per hectare.
- 8.6 The residential density of the proposal would be 532 habitable rooms per hectare which is below the indicative range within the London Plan for a central area.
- 8.7 The Mayor's Housing SPG, at paragraph 1.3.12, further states that the density ranges should be "*used as a guide and not an absolute rule, so as to also take proper account of other objectives*". It does not preclude developments with a density above the suggested ranges, but requires that they "*must be tested rigorously*" (para.1.3.14). This will include an examination of factors

relating to different aspect of “liveability” of a proposal (dwelling mix, design and quality of accommodation), access to services, impact on neighbours, management of communal areas and a scheme’s contribution to ‘place shaping’. The impact of massing, scale and character in relation to nearby uses will be particularly important.

- 8.8 The SPG also considers the opportunities and constraints with regards to density on small sites (para.1.3.39). Responding to existing streetscape, massing and design of the surrounding built environment should be given special attention – where existing density is high, for example, higher density can be justified. Paragraph 1.3.40 notes that small sites require little land for internal infrastructure, and as such, it is appropriate for density to reflect this. These factors are all relevant to the development of the application site.
- 8.9 It is considered that the proposed residential development has been designed to deliver new homes within buildings that respond to their local context, taking into account both the physical constraints of the site and its relationship with neighbouring properties and the nearby townscape.
- 8.10 The proposed development does not exceed the London Plan density range. It delivers on London Plan policy by optimising additional housing on an existing residential site in a highly accessible location. The density of the development is therefore considered to be acceptable.

Housing Unit Mix

- 8.11 CLP1 Policy SP2.5 seeks to secure the provision of family housing and states the Council’s aspiration for 60% of all new homes outside of the Croydon Opportunity Area having three or more bedrooms. It is important to highlight that emerging policy differs from the existing policy, whereby 2 bed (4 person) units are also considered to be family accommodation for the first 2 years of the plan.
- 8.12 The unit mix of the development is reproduced below for ease of reference:

Type : Flats	Market	Affordable Housing		No. of Persons
		Affordable Rent	Shared Ownership	
Studio	1	0	0	1
1 bed/2 person	8	0	3	22
2 bed/3 person	5	0	1	18
2 bed/4 person	3	0	1	16
3 bed/5 person	10	0	2	60
TOTAL	27	0	7	117

- 8.13 The proposal allows for 35% 3 bedroom units and 29% two bedroom units. With reference to emerging Local Plan Policy document CLP2 (see Section 5) two bedroom four person units (as are proposed) may be acceptable in lieu of larger family homes of three beds or more. Therefore when calculating the family housing provision on this basis, the proposed development will exceed

the above target within CLP1 and the proposed proportion of family housing is considered acceptable.

- 8.14 On balance, it is considered that the proposal would provide an appropriate mix of units 11 x 1-bedroom; 10 x 2-bedroom; 12 x 3-bedroom; 1 x studio to meet a variety of demands across the Borough in accordance with Policy 3.8 of the London Plan.

Affordable Housing – Regional Policy Context

- 8.15 Policies 3.8 to 3.13 of the London Plan relate to affordable housing. Policy 3.11 states that the Mayor will, and boroughs and other relevant agencies and partners should, seek to maximise affordable housing provision and ensure an average of at least 17,000 more affordable homes per year in London over the term of this Plan. In order to give impetus to a strong and diverse intermediate housing sector, 60% of the affordable housing provision should be for social and affordable rent and 40% for intermediate rent or sale. Priority should be accorded to provision of affordable family housing. Paragraph 173 of the NPPF imposes an obligation on Councils to ensure viability when setting requirements for affordable housing.
- 8.16 Policy 3.12 of the London Plan further seeks the maximum reasonable amount of affordable housing when negotiating on individual housing schemes but states that the objective is to encourage rather than restrain residential development.

Affordable Housing – Existing Local Policy Context

- 8.17 Policy SP2.4 of CLP1 seeks up to 50% affordable housing provision on sites such as this. Table 4.1 provides flexibility, requiring a minimum level of affordable housing on all sites. Following the end of the first three years of the plan, the minimum level was reviewed (from its previous minimum requirement of 15%) and this is currently set at 50%. The affordable housing should be provided at a ratio of 60:40 between affordable rented homes and intermediate housing. This policy is being reviewed through the partial review of CLP1 (CLP1.1). The Local Plan Inspector has introduced main modifications to the policy, but these do not alter the overall approach of the policy.

Affordable Housing – Emerging Local Policy Context

- 8.18 Taking account of the sites location, emerging policy SP2.4 of CLP1.1 seeks a minimum on site provision of 15% of units being provided as affordable housing, along with a review mechanism (which seeks to secure additional affordable housing to make up for any shortfall once actual costs and revenues are known).
- 8.19 Emerging policy retains the 60:40 (affordable rent and shared ownership) ratio but expands the types of intermediate products to include starter homes and intermediate rent products as well as low costs shared ownership homes.

- 8.20 The Applicant's viability report has been independently assessed by the Council's viability consultant, who have confirmed the accuracy of the applicant's financial viability assessment. In this case the provision of the CLP1 target of 50% affordable housing is not achievable. The developer is proposing to achieve affordable housing on site through delivering 20% by habitable rooms within the development. This represents 7 shared ownership units comprising 3 x 1 bedroom, 2 x 2 bedroom and 2 x 3 bedroom flats. The 7 units would comprise the entire ground floor of the development.
- 8.21 The affordable housing offer makes provision for shared ownership only. This is proposed in order to maximise the overall quantum of affordable housing the scheme can viably support. The London Plan *Housing* Supplementary Planning Guidance acknowledges that there is a significant local need for smaller 1, 2 and 3 bedroom shared ownership homes due to the growing number of newly forming households who are unlikely to be eligible for social/affordable rented accommodation but who are unable to access private sale housing due large equity deposit and mortgage repayment requirements. The applicant has made a substantive case (as tested through the financial viability assessment) that it would not be viable to provide and manage two different affordable housing tenures in the building.
- 8.22 As the amount of affordable housing proposed is less than the minimum amount of 50% affordable housing required by planning policy, it is proposed that review mechanisms will be sought through the S106 Agreement. As the residential component of the scheme is likely to be delivered over a number of years review mechanisms will be required at appropriate milestones. The detail of this will be finalised as part of the S106 Agreement, details of which are still being negotiated. The maximum cap for the affordable housing review mechanism would be 50% quantum of affordable housing provision to comply with current policy. On balance, the affordable housing offer is considered to be appropriate, subject to the review mechanisms as described above.
- 8.23 Having regard to comments from the independent assessment of viability, the planning history and other material considerations, it is considered that the proposal (with regards to affordable housing) satisfactorily accords with the objectives of the London Plan and the Croydon Local Plan (adopted and emerging policy documents) .

Townscape and visual impact

- 8.24 The NPPF further attaches great importance to the design of the built environment. Paragraph 17 gives 17 core planning principles. One of these principles is '*always seeks to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings*'. It further states that '*The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people*'.

- 8.25 Policies 7.4 and 7.6 of the London Plan state that new development should be complementary to the established local character and that architecture should make a positive contribution and have a design which is appropriate to its context. CLP1 Policy SP4.1 states that developments should be of a high quality which respects and enhances local character. Policies UD2 and UD3 of the Croydon Replacement Unitary Development Plan (The Croydon Plan) 2006 Saved Policies require development to be of a high quality and visually appropriate design which respects the existing development pattern.
- 8.26 The application site is located in a predominantly residential area of East Croydon, facing north onto Fairfield Road near a roundabout junction serving Park Hill Road and Chepstow Road. Fairfield Road runs west towards Fairfield Halls and to the Croydon Metropolitan Centre. There is no predominant form of building in the locality. Residential buildings are generally two storey houses or flatted developments of 3 and 4 storeys in height. Altitude 25 to the west of the site is twenty-five storeys in height. Park Hill park is a short walk from the site and has extensive greenery, gardens and woods, several tennis courts, and the Water Tower.
- 8.27 The existing dwellings do not benefit from any heritage designation and the acceptability of their demolition has been established in part through the extant planning permission (Ref: 15/05542/P) for re-developing 30 Fairfield Road. Therefore, the principle of intensifying the site to include more residential accommodation is supported given the site's physical context – its large scale, the generous width of Fairfield Road and the adjacent roundabout to the site, the nearby four-storey flatted developments, its proximity of the site to East Croydon Station – and the need for housing in Croydon.
- 8.28 The proposed block would rise in height from 4 storeys at the west to 6 storeys to the east, adjacent to the roundabout. The main 6 storey height of the building would be set against that background of a large and spacious roundabout and a very wide highway into the Croydon Metropolitan Centre and would provide a strong focal point to enhance the gateway and would relate well to the more built up form of development that occurs on the route into the town centre. The 4 storey element would deliberately read as a subservient stepped form to the main 6 storey bulk of the building and there would be a significant separation distance of 6.24 metres between the western flank of the proposed building and the adjacent dwelling at 26 Fairfield Road. The proposed facade of the building would be set back sufficiently from the pavement of Fairfield Road to ensure the staggered building line would relate sensitively to adjacent dwellings and to prevent any overbearing effect upon the street scene. The distribution of height throughout the block would be well balanced and the space that would remain around the building would be successful.
- 8.29 The change in height between the western and eastern flanks of the building, the use of set backs, the glazed vertical curtain wall on the façade to signpost elevation nearest the roundabout would all assist in providing an active and interesting street frontage and would set a high quality precedent for any

future development on corner sites in the locality. The use of recessed windows would provide further interest and articulation to the building within the envelope of a simple composition and contemporary design. The proposed material palette would also reflect the simplicity and effectiveness of the design. It would be formed predominantly of yellow stock buff bricks and would have powder coated aluminium window frames and doors. There would be no competing or jarring elements within the composition and appearance of the building and it would have a very harmonious appearance. The full details of the proposed material palette would be secured by condition to ensure high quality and sustainable materials are used.

- 8.30 The proposed landscaping and low perimeter boundary treatment would open up views into and across the site, which are currently impeded by the high boundary treatment on Park Hill Road and The Avenue. Improving and lowering the boundary treatment adjacent to the rear footpath connecting Park Hill Road to The Avenue would increase natural surveillance along that route and make it feel significantly safer and more pleasant for pedestrians. It would provide a high quality landscape enhancing the green and leafy character of the area while providing significant visually improvement.
- 8.31 Overall, the development would contribute positively to the surrounding townscape. The design is visually pleasant, well thought through and the materials and details of high quality. The facades are well articulated and the fenestration rhythm is elegant and clear.
- 8.32 The elevational treatment and materials for the proposed development have been chosen to ensure simplicity throughout the design of the development and would be in keeping with the local context. The fenestration would be well proportioned, whilst the positioning of the balconies would create an active frontage. The regularity of the elevations would be evident on all sides and accentuates the rhythm and uniform nature of the design and the higher six storey element would provide the main focal point to the prominent corner adjacent to the roundabout on the eastern side, while the four storey element would drop down sympathetically to reference the built environment away from the roundabout.
- 8.33 Overall, the proposal would sit comfortably with neighbouring buildings and within the streetscene and would be in accordance with the design policies set out above.

Impact on adjoining occupiers

- 8.34 One of the core planning principles (paragraph 17) in the NPPF is that new development should “*always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings*”. London Plan Policy 7.1 states that in their neighbourhoods, people should have a good quality environment.

- 8.35 Croydon Local Plan: Strategic Policies SP4.1 and SP4.2 seek to respect and enhance character to create sustainable communities and enhance social cohesion and well-being. Croydon Plan Policy UD8 states that the residential amenity of adjoining occupiers should be protected. The compliance of the proposal with these policies is now considered below in relation to each impact.

Sunlight and daylight – policy context

- 8.36 Emerging Policy DM11.6 also requires new development proposals to protect or improve the amenity of the occupiers of adjoining residential and commercial buildings, to ensure that “*the amenity of the occupiers of adjoining buildings are protected*” (part a) and that “*they do not result in direct overlooking at close range or habitable rooms*” (part b). Criteria d and e confirm the developments should d) “*Provide adequate sunlight and daylight to potential future occupants*”; and e) “*They do not result in significant loss of existing sunlight or daylight levels of adjoining occupiers.*”
- 8.37 The nearest neighbouring residential property to the application site is 26 Fairfield Road (a two storey residential property), which also has an extant planning permission (Ref: 16/06484/FUL) for a back garden residential development comprising a three storey detached building with 6 one bedroom flats.
- 8.38 The current application is accompanied by an independent Daylight/Sunlight report produced by Herrington Consulting Ltd which provides an assessment of the potential impact of the development on sunlight, daylight and overshadowing to neighbouring residential properties based on the approach set out in the Building Research Establishment’s (BRE) ‘Site Layout Planning for Daylight and Sunlight: A Good Practice Guide’.
- 8.39 Daylight has been assessed in terms of Vertical Sky Component (VSC) and sunlight has been assessed in terms of Annual Probable Sunlight Hours (APSH) and overshadowing has been assessed against the above BRE guidelines. The BRE Guidelines provide numerical guidelines, but these are not mandatory should not be seen as an instrument of planning policy, these (numerical guidelines) are to be interpreted flexibly since natural lighting is only one of many factors in site layout design.
- 8.40 Daylight: the BRE Guidelines stipulate that there should be no real noticeable loss of daylight provided that either:
The Vertical Sky Component (VSC) as measured at the centre point of a window is greater than 27%; or the VSC is not reduced by greater than 20% of its original value. (Skylight); or The daylight distribution, as measured by the No Sky Line (NSL) test where the percentage of floor area receiving light is measured, is not reduced by greater than 20% of its original value.
- 8.41 It should be noted that the London Plan guidance is that in London accepting VSC reductions exceeding 20% is acceptable in view of its urban context.

8.42 Sunlight: the BRE Guidelines confirm that windows that do not enjoy an orientation within 90 degrees of due south do not warrant assessment for sunlight losses. For those windows that do warrant assessment it is considered that there would be no real noticeable loss of sunlight where:

In 1 year the centre point of the assessed window receives more than 1 quarter (25%) of annual probable sunlight hours (APSH), including at least 5% of Annual Winter Probable Sunlight Hours (WSPH) between 21 Sept and 21 March – being winter; and less than 0.8 of its former hours during either period; and In cases where these requirements are breached there will still be no real noticeable loss of sunlight where the reduction in sunlight received over the whole year is no greater than 4% of annual probable sunlight hours.

Daylight – assessment

8.43 A total of 74 windows from 9 sites adjacent to or in the locality of the site were tested. This included windows on the potential block of flats in the rear garden of 26 Fairfield Road if the planning permission (Ref: 16/06484/FUL) is implemented.

- Vertical Sky Component and Annual Daylight Figure

Inspection of the results of this test show that all of the windows either retain a VSC value greater than 27% post development, or have a ratio of change that is 0.8 or above and therefore are fully compliant, with the exception of one window on the existing dwelling at 26 Fairfield Road. Surveys indicate that the window presenting the transgression is a smaller secondary ground floor flank window to a room served by a larger main window. Consequently, the results of the VSC analysis for this one window in isolation are not necessarily indicative of the impact of the daylighting levels within the room itself. In addition, the Annual Daylight Figure (ADF) results show that the room in question, a living room, retains 1.58% ADF with the proposed development in place, which is above the minimum 1.50% required by the BRE for this type of room. Therefore, it can be concluded that the rooms retains good levels of daylight with the proposed development in place.

8.44 Overall, the development is not anticipated to have any notable adverse impact on the daylight received by neighbouring and nearby properties.

Sunlight - assessment

8.45 A total of 25 windows from 7 sites adjacent to or in the locality of the site were tested. Again, this included the block of flats proposed in the rear garden of 26 Fairfield Road.

8.46 To conclude that a new development has no adverse impact, it is required to pass one of three Annual Percentage Sunlight Hours tests is passed. In this instance the results of the assessment show that all windows pass at least two of the three sunlight tests. Consequently, it has been demonstrated that the proposed scheme would have a negligible impact on neighbouring buildings.

- 8.47 Therefore, the proposed development would not have any notable adverse impact on sunlight access to windows of neighbouring and nearby properties.

Outlook and privacy

- 8.48 The separation distance of the proposed development to the adjacent dwelling at 26 Fairfield Road is 6.24 metres and to the potential development in the rear garden of 26 Fairfield Road is 16.72 metres. It is not considered that the windows in flats in the rear of 24 Fairfield Road or windows to any other nearby properties would be adversely effected in terms of loss of outlook or privacy. While the garden area of 26 Fairfield Road would be overlooked, it is already overlooked to a degree by the existing adjacent dwellings, therefore no adverse loss of privacy to the garden of 26 Fairfield Road would occur.

Quality of living environment provided for future residents

Residential space standards

- 8.49 Policy 3.5 of the London Plan states that new residential units should provide the highest quality internal environments for their future residents and should have minimum floor areas in accordance with the Government's technical housing standards set out in Table 3.3 and recognises that a genuine choice of homes should be provided in terms of both tenure and size. Detailed residential standards are also contained within the Mayor's London Housing SPG.
- 8.50 Policy 3.8 of the London Plan further states that 10% of new residencies within a development should be wheelchair accessible or easily adaptable for residents who are wheelchair users. Provision should also be made for affordable family housing, wheelchair accessible housing and ensure all new housing meets parts M4 (2) and (3) of the Building Regulations. Policy UD8 of the Croydon Plan further states that external amenity space should be provided to serve new residential units at a level which is commensurate with that provided in the surrounding area.
- 8.51 The London Housing SPG provides further details in relation to housing standards, including in relation to the provision of dual aspect units and private amenity space. Housing SPG standard 4.10.1 states that 5m² of private amenity space should be provided for each one bedroom unit, with a further 1m² provided for each additional occupant. Standard 4.10.3 states that the minimum length and depth of areas of private amenity space should be 1.5m and standard states that developments should avoid single aspect units which are north facing, have three or more bedrooms, or are exposed to a particularly poor external noise environment.
- 8.52 All of the proposed units would meet the National technical housing standards in terms of overall size and bedroom size. All of the units would also meet the requirements outlined in the GLA's Housing SPG in relation to amenity space quantum and minimum dimensions and all units would achieve a minimum 2.5 metre floor to ceiling height.

- 8.53 All of the proposed 3 bedroom flats would have dual aspects. Four of the 2 bedroom flats sited in the north-western corner, at ground to third floors, would be single aspect and north facing. In mitigation those units would have staggered layouts and access to private amenity spaces with outlook onto landscaped areas. This would be acceptable
- 8.54 A total of 4 (12%) of the proposed flats would be wheelchair adapted or capable of easy adaptation for wheelchair users. The Policy and Housing SPG requirements outlined above are therefore met.

Private/Communal amenity space and child play space provision

- 8.55 Policy DM11 of Croydon's Local Plan: Detailed Policies and Proposals (Main Modifications) confirms support for new development which includes private amenity space that is of high quality design that enhances and respects the local character of the surrounding area.
- 8.56 Policy 3.6 of the London Plan states that housing development proposals should make a provision for play and informal recreation for children and young people. According to Housing SPG standard 1.2.2, the development is required to make appropriate play provisions in accordance with a GLA formula and calculation tool, whereby 10sqm of play space should be provided per child, with under-5 child play space provided on-site as a minimum, in accordance with the London Plan 'Shaping Neighbourhoods: Play & Informal Recreation SPG'.
- 8.57 Amenity space areas including private balconies and a communal rear garden amenity space for the future residents are proposed. A soft landscaped area is to be provided on the frontage onto Fairfield Road / Park Hill Road. Overall, the provision and quality of private and communal amenity space, is considered to be acceptable and provision within the communal garden could be made for children's play space. The site is also within a one minute walk of Park Hill Park.

Privacy

- 8.58 Standard 5.1.1 in the GLA's Housing SPG states that habitable rooms should be provided with suitable privacy. 18-21m is indicated as a suitable minimum distance between facing habitable rooms, although the standard notes that *"adhering rigidly to these measures can limit the variety of urban spaces and housing types in the city and can sometimes unnecessarily restrict density."*
- 8.59 Given the orientation and positioning of the proposed windows within the building and the separation distances (as detailed in paragraph 8.48 above) between these and existing neighbouring residential buildings (and potential development in the rear of 26 Fairfield Road), the proposal would not result in any undue overlooking or loss of privacy to the detriment of existing neighbouring and future occupiers of the development.
- 8.60 Overall, the proposed development is therefore considered to provide a good quality of accommodation to the future occupants.

Environmental Impacts

Air pollution, noise and vibration

- 8.61 Policy 7.14 of the London Plan states that the Mayor will work with strategic partners to ensure that the spatial, climate change, transport and design policies of his plan support the implementation of his Air Quality Strategy to achieve reductions in pollutant emissions and public exposure to pollution. It also states that development should be 'air quality neutral' and not lead to further deterioration of existing poor air quality (such as areas designated as Air Quality Management Areas). The whole of Croydon Borough has been designated as an Air Quality Management Area – AQMA.
- 8.62 Chapter 11 of the NPPF also requires planning policies and decisions to avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development; mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from noise from new development; and to recognise that development will often create some noise. Chapter 13 states that when determining planning applications, local planning authorities should ensure that any unavoidable noise, dust and particle emissions and any blasting vibrations are controlled, mitigated or removed at source.
- 8.63 Policy 7.15 of the London Plan states that development proposals should seek to minimise the existing and potential adverse impacts of noise on, from, within or in the vicinity of development proposals. Croydon Local Plan: Strategic Policies 6.3 requires development to positively contribute to improving air, land, noise and water quality by minimising pollution. Policy EP1 of the UDP Saved Policies 2013 refers to the pollution of water, air or soil or pollution through noise, dust, vibration, light heat or radiation.
- 8.64 The developers would be required to complete the Croydon Development Emission Tool (CDET) which is an Excel based building modelling tool. CDET focuses on quantifying the levels of the air pollutants from homes, commercial buildings and other non-industrial buildings. This could be secured through a condition requiring the submission of a Low Emission Strategy.
- 8.65 There is also a requirement for this development to incorporate a S106 contribution for air quality. As such a S106 air quality contribution is required to ensure air quality benefits are realised.
- 8.66 As a major development, the construction phase would involve very large scale operations and is likely to be elongated. As the potential for significant adverse environmental effects during this phase is large, a Construction Logistics Plan and an Environmental Management Plan should therefore be secured by condition. This would assist in minimising noise, disturbance, and disruption from demolition and construction works.

Water resources and flood risk

- 8.67 Policy 5.12 states that development proposals must meet flood risk assessment and management requirements. CLP1 Policy SP6.4 states that the Council will seek to reduce flood risk and protect groundwater and aquifers.
- 8.68 The London Plan SPG states new development should incorporate Sustainable Urban Drainage Systems and green roofs where practical with the aim of maximising all opportunities to achieve a Greenfield run-off rate, increasing bio-diversity and improving water quality. Greenfield runoff rates are defined as the runoff rates from a site, in its natural state, prior to any development. Typically this is between 2 and 8 litres per second per hectare. Surface water run-off is to be managed as close to source as possible.
- 8.69 A Flood Risk Assessment has been submitted and whilst information has been submitted that assesses flooding and drainage matters associated with the development and indicating that the development is not likely to result in an increased flood risk, additional information would need to be submitted. A condition is recommended to ensure an updated drainage scheme that incorporates SuDs, as requested by the Lead Local Flood Authority (LLFA), is delivered. As such the impact of the development on water resources and flood risk is considered to be acceptable and in accordance with the provisions of local and national policy.

Impact on trees

- 8.70 Section 11 of the NPPF seeks to conserve and enhance the natural environment London Plan Policy 7.21 states that trees and woodlands should be protected, maintained and enhanced. Croydon Plan 2006 (Saved Policies 2013) policy NC4 requires that valued trees especially those designated by Tree Preservation Orders are protected. Croydon Local Plan: Strategic Policy SP7.4 seeks to enhance biodiversity across the borough.
- 8.71 There are a number of prominent trees along the pavement/grass verge of Fairfield Road and a number of tree within the grounds of the application site itself, including a Copper Beech tree in the rear garden of 28 Fairfield Road which is protected by a Tree Preservation Order. The Copper Beech tree would be retained, however in total 8 trees would be removed to facilitate the development, this includes one street tree on Fairfield Road. The applicant has reached agreement in principle with TfL (who are the appropriate highway authority for Fairfield Road) for the loss of the street tree on the basis that a replacement tree of comparable status would be planted nearby on the highway. This matters relating to the loss of trees and replacement trees would be secured by condition and appropriate legal agreements.
- 8.72 An arboricultural assessment has been submitted with the application which provides full details of the trees to be retained and removed. Those retained would have tree protection measures put into place during demolition / construction works. The quality of the trees to be removed is mediocre and

no objection has been raised by the Council's Tree Section to their removal. Full details of landscaping, including replacement tree planting, together with details of tree protection for those to be retained would be secured by condition.

Transportation, access and parking

- 8.73 Chapter 4 of the NPPF seeks to promote sustainable transport. London Plan Policies 6.3 and 6.13 and Croydon Plan Policies T2 and T8 require that development is not permitted if it would result in significant traffic generation which cannot be accommodated on surrounding roads. They also require that acceptable levels of parking are provided. Disabled parking spaces are required by Policy 6.13 of the London Plan and the accompanying Housing SPG.
- 8.74 Policy 6.9 of the London Plan states that secure, integrated and accessible cycle parking should be provided by new development in line with minimum standards.
- 8.75 The site is located in an area with the highest PTAL of 6b, being well located for the East Croydon Transport Interchange and Croydon Town centre. Fairfield Road forms part of the Transport for London Road Network (TLRN) The proposal is to provide 13 car parking spaces in a basement parking area with 4 of these being designated for disabled use. The quantum of off-street parking works out at less than 1 space per 2 dwellings and TfL have agreed it as acceptable. The applicant has also agreed to make provision for a site-related car club space (with minimum 3 years free membership for residents) and to prohibit residential parking permits for future residents. These matters would be secured as part of the S106 legal agreement. Electric vehicle charging points be provided for the off-street parking while cycle parking would be provided in accordance with the standards set out in the London Plan and is acceptable. The proposed amount of off-street parking together with the proposed car club provision and restriction of residential parking permits would all assist to alleviate additional on-street parking stress in the vicinity, which is a concern that has been raised in residential objections to the scheme. Given the accessibility of the site and the measures that would be put into place to promote sustainable travel choice the amount of off-street parking is considered acceptable. The measures set out in the Travel Plan submitted with the application, would be secured by condition, as would the requirement for a Delivery and Servicing Plan, and a Demolition/Construction Logistics Plan.
- 8.76 The vehicle access is to be improved and be widened to 4.5m and moved further from the roundabout junction with Park Hill Road. This is considered acceptable. The proposed access location will require the removal of a small tree and re-siting of a lamp column. Given that this is part of the TLRN this will need to be undertaken with agreement of TfL. The applicant advises that upon completion of the proposed site access, the existing vehicle accesses shall be permanently closed and the full height kerbs and verge reinstated. The applicant also advises that any highway tree removed to facilitate access to the

site would be replaced by a suitable specimen in a location, as agreed in principle with TfL. All of these measures would be secured by condition or through an appropriate legal agreement.

- 8.77 The refuse store is located to the rear of the site and it is proposed that refuse and other deliveries and servicing will take place from The Avenue. This is considered acceptable.
- 8.78 In terms of road safety TfL has requested that a Road Safety Audit (RSA) with regards to the vehicle access and egress is undertaken prior to the commencement of the development. The applicant has agreed to submit an RSA as a condition of planning permission and address and implement any remedial measures that it identifies, and do so in consultation/agreement with TfL.
- 8.79 In summary, the applicant has agreed to the following in order to promote sustainable travel choice :
- Site-related car club space;
 - Electric vehicle charging points;
 - Provision of 56 cycle parking spaces
 - Restriction of residential parking permits
 - Submission for approval of a construction logistics plan
 - Submission for approval of a delivery & servicing plan
 - Submission for approval of TfL of a road safety audit
 - Re-instatement of full-kerbs to redundant dropped kerbs
 - Planting of replacement highway tree and grass verge and works of making good to the highway (on Fairfield Road)
- 8.80 The works within the public highway to deliver the improved site access will require the developer to enter into a S278 Agreement with TfL. This will require the developer to submit, and TfL to agree, detailed construction drawings and method statement prior to commencement on site. TfL has agreed in principle to this course of action.

Sustainability

- 8.81 At the heart of the NPPF is a presumption in favour of sustainable development. It states: '*Planning plays a key role in shaping places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impact of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure*'.
- 8.82 The NPPF actively promotes developments which reduce greenhouse gas emissions (para 95). In determining planning applications it states that local planning authorities should expect development to comply with local policies and expect that layout of development in a manner that would reduce energy consumption through building orientation, massing and landscape (para 96).
- 8.83 Policies 5.2 and 5.3 of the London Plan state that development proposals should minimise carbon dioxide emissions and exhibit the highest standards

of sustainable design and construction, whilst policy 5.7 states that they should provide on-site renewable energy generation. London Plan policy 5.5 states that Boroughs should seek to create decentralised energy networks, whilst Policy 5.6 requires development proposals to connect to an existing heating network as a first preference if one is available.

- 8.84 Policy SP6.2 from the borough's Local Plan Strategic Policies sets out the Council's expectations in relation to energy and CO2 reduction, in accordance with the London Plan. It states that it would be expected that high density residential development would (a) incorporate site wide communal heating systems, and (b) that major development will be enabled for district energy connection unless demonstrated not to be feasible or financially viable to do so.
- 8.85 The Sustainability and Energy Assessment submitted with the application demonstrate that the proposal has been prepared in accordance with relevant strategic and local planning policies to provide a high quality and sustainable building in this key central location.
- 8.86 The fundamental principle on which the sustainability policies are based is an expectation that development will follow the energy hierarchy: be lean (use less energy), be clean (supply energy efficiently), and be green (use renewable energy).
- 8.87 The proposed development incorporates the following key sustainability features:
- The re-use of previously developed land;
 - Effective site layout in response to the neighbouring context;
 - Efficient design of the proposed massing, openings and internal layouts so that habitable spaces across the site benefit from abundant daylight and sunlight levels, whilst impacts to neighbouring buildings are kept to a minimum;
 - Significant carbon emissions' savings on-site (35.37%) through energy efficiency measures and the uptake of renewables;
 - The specification of water efficient fittings to limit water consumption to less than 105 litres per person per day for domestic uses;
 - The protection of natural features of ecological value, especially the TPO Copper Beech Tree at the rear of the proposal site, and the improvement of biodiversity on site through soft landscaping;
 - Effective pollution management and control: the development is not expected to have any significant adverse effects to air, noise, land or watercourses.
- 8.88 The proposal would achieve CO2 savings on site of 35.37% against Part L 2013 and renewable energy generation offsets using photovoltaic panels of 11.38% of CO2 emissions in excess of the 10% target under Policy EP16 of Croydon's adopted Local Plan policy.
- 8.89 London Plan policy now requires zero carbon. The carbon dioxide savings

proposed fall short of the policy requirement. The Council would accept a cash in lieu payment to be secured through a S106 legal agreement and the applicant has accepted this.

Other Planning Issues

Employment and training

- 8.90 Planning policy including the adopted Section 106 Planning Obligations in Croydon and their Relationship to the Community Infrastructure Levy—Review 2017 sets out the Councils' approach to delivering local employment for development proposal. The applicant has agreed to a contribution and an employment and skills strategy.

Designing Out Crime

- 8.91 For a building of this nature, the main considerations would relate to access to the building and the areas of public realm around the building.
- 8.92 The proposed development would incorporate principles of Secured by Design. This would be secured by condition to ensure that the proposed development provides a safe and secure environment.

Conclusions

- 8.93 All other relevant policies and considerations, including equalities, have been taken into account. Planning permission should be GRANTED for the reasons outlined in this report.