

PART 6: Planning Applications for Decision

Item 6.1

1 APPLICATION DETAILS

Ref: 17/06297/FUL
 Location: Land at Lion Green Road Car Park, Coulsdon CR5 2NL
 Ward: Coulsdon West
 Description: Redevelopment of site to provide 5 x five, six and seven storey buildings providing 157 units (96 one bedroom, 42 two bedroom and 19 three bedroom flats): provision of vehicular access, residential and town centre car parking spaces, hard and soft landscaping works and new private and public amenity space.
 Drawing Nos: A238-A-(00)-000; A238-A-(00)-001; A238-A-(00)-002; A238-A-(00)-021; A238-A-(00)-022; A238-A-(01)-020; A238-A-(01)-021; A238-A-(01)-022; A238-A-(01)-023; A238-A-(01)-030; A238-A-(01)-031; A238-A-Z1-(01)-101; A238-A-Z1-(01)-102; A238-A-Z1-(01)-103; A238-A-Z2-(01)-101; A238-A-Z2-(01)-102; A238-A-Z2-(01)-103; A238-A-Z2-(01)-104; A238-A-Z2-(01)-105; A238-A-Z3-(01)-101; A238-A-Z3-(01)-102; A238-A-Z3-(01)-103; A238-A-Z3-(01)-104; A238-A-Z3-(01)-105; A238-A-Z4-(01)-101; A238-A-Z4-(01)-102; A238-A-Z4-(01)-103; A238-A-Z4-(01)-104; A238-A-Z4-(01)-105; A238-A-Z4-(01)-106; A238-A-Z5-(01)-101; A238-A-Z5-(01)-102; A238-A-Z5-(01)-103; A238-A-Z1-(01)-201; A238-A-Z1-(01)-202; A238-A-Z1-(01)-203; A238-A-Z1-(01)-204; A238-A-Z2-(01)-201; A238-A-Z2-(01)-202; A238-A-Z2-(01)-203; A238-A-Z2-(01)-204; A238-A-Z3-(01)-201; A238-A-Z3-(01)-202; A238-A-Z3-(01)-203; A238-A-Z3-(01)-204; A238-A-Z4-(01)-201; A238-A-Z4-(01)-202; A238-A-Z4-(01)-203; A238-A-Z4-(01)-204; A238-A-Z5-(01)-201; A238-A-Z5-(01)-202; A238-A-Z5-(01)-203; A238-A-Z5-(01)-204; A238-A-Z1-(01)-301; A238-A-Z1-(01)-302; A238-A-Z2-(01)-301; A238-A-Z2-(01)-302; A238-A-Z3-(01)-301; A238-A-Z3-(01)-302; A238-A-Z4-(01)-301; A238-A-Z4-(01)-302; A238-A-Z5-(01)-301; A238-A-Z5-(01)-302; A238-A-(01)-401; A238-A-(01)-402; A238-A-(01)-403; A238-A-(01)-404; A238-A-(01)-405; A238-A-(01)-406 and revised A238-A-(01)-001 received on 9th March 2018.
 Applicant: Minal Goswami – Brick by Brick
 Agent: Peter Twemlow – DP9
 Case Officer: Robert Naylor

	1B 2P	2B 3P	2B 4P	3B 5P	TOTAL	%
AFFORDABLE	17 (AR) 30 (SO)	5 (AR) 6 (SO)	6 (AR) 5 (SO)	5 (AR) 5 (SO)	33 46	21% 29%
PRIVATE	49	9	11	9	78	50%
TOTAL	96	20	22	19	157	
FAMILY UNITS	61%	13%	14%	12%		

Number of car parking spaces	Number of cycle parking spaces
116 public car parking spaces 45 residential car parking spaces	220 long stay spaces and 4 short term spaces per block

- 1.1 This application is being reported to Planning Committee as the Ward Councillor (Cllr Mario Creatura) made representations in accordance with the Committee Consideration Criteria and requested Planning Committee consideration. Furthermore, objections above the threshold in the Committee Consideration Criteria have been received.

2 BACKGROUND

- 2.1 This scheme was presented to Planning Committee on the 30th November 2017 as part of the pre application process. The following comments were raised by the Planning Committee during these presentations:

- Importance of mixed and balanced communities
- Landscaping – is it public or private
- Archaeological surveys needed
- Impacts on Scheduled Ancient Monument
- Parking a real concern
- Tree planting encouraged
- Children's play space required
- Potential for overlooking to Lion Green Road
- Soft landscaped edge interesting
- Welcomed the design
- 50% affordable support
- Challenge of residential vs parking
- Could more parking be provided on the site
- Lack of retail provision on the site
- Need for family units

- 2.2 The scheme was presented to the Place Review Panel on 27th October 2017. The PRP stated that the proposal was a fascinating scheme and it included beautifully formed buildings with high quality internal accommodation that could link Coulsdon District Centre to the greenbelt countryside nearby both visually and physically. However, the panel has several significant concerns about the scheme which mostly relate to the layout concept of placing pavilions within a publicly accessible landscape. These are summarised as follows:

- The landscape is likely to be expensive to maintain and this essential on-going cost needs to be planned for and maintainable in the long term
- The landscape might not be used by residents as anticipated by the applicant because of its publicly accessible nature and that it lacks clarity about what are semi-private or private spaces
- Given the site is publicly accessible, the landscape could attract anti-social behaviour which could add to the maintenance costs
- The landscape will require exquisite detailing and a commitment to long term care for the scheme to be a success. Both requirements will have real costs.
- The quantum of development is too large to achieve the desired intention of providing visual landscape permeability through the site and the panel is not convinced that there is space for all of the proposed trees to thrive
- The public car park is located too close to the residential blocks and landscaped spaces and requires a high quality boundary treatment between it and the residential development

- The development facing Lion Green Road should address the street and Coulsdon Town Centre more positively. In this location the pavilion forms should be adapted to a more urban form that would address the urban interface with the town. As a minimum, PRP considered that development addressing Lion Green Road should include more active uses at ground floor
- The ground-floors of the pavilions need to be carefully considered so as to integrate successfully in to the landscape, avoid producing poorly overlooked areas beneath the residential accommodation but provide an adequate sense of security for residents. It is recommended that a bespoke solution for each of the ground floors is required to situate each building successfully and to optimise the quality of the landscape spaces in between buildings.
- The rooftop design needs to be of a high quality as it will be visible from the surrounding hilltops
- Wheelchair and service access around the site should be shown on the plans
- Pedestrian access to the Cane Hill site and neighbouring countryside should be developed further and delivered as part of the scheme

3 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- 3.1 The proposal will provide residential use, re-provision of public car parking facilities to retain the vitality and viability of the District Centre and will provide further community use (potentially a NHS health centre) on a donor site and is acceptable in terms of use, given the Lion Green Road allocation.
- 3.2 The development would provide 50% affordable housing which is the maximum reasonable level of affordable housing the development can afford albeit with an early stage review mechanism. Although the tenure mix would not be fully policy compliant the quantum of affordable units would not be sufficient grounds to warrant refusal of planning permission and therefore acceptable in this instance.
- 3.3 In relation to heritage assets, there will be no loss of significance or substantial harm and the identified the public benefits of the scheme would outweigh the scale of harm caused.
- 3.4 The bulk, height, layout and massing are acceptable and architectural expression in design and townscape impacts are acceptable.
- 3.5 The development would not have a detrimental impact on highway safety and parking demand can be accommodated on the surrounding road network.
- 3.6 Any impacts on neighbouring amenity can be mitigated through the provision of suitable conditions and are acceptable.
- 3.7 The living conditions provided for future residents would be acceptable.
- 3.8 A robust landscaping maintenance and management scheme can be secured which would mitigate loss of tree and the replacements can be secured by condition.
- 3.9 The scheme is acceptable in terms of sustainability and environmental impact.
- 3.10 Subject to conditions the scheme has been designed so that it suitably mitigates surface water and groundwater flooding, as well as incorporating sustainable urban drainage features.

4 RECOMMENDATION

- 4.1 That the Committee resolve to GRANT planning permission subject to:
- A. Any direction by the London Mayor pursuant to the Mayor of London Order
 - B. The prior completion of a legal agreement to secure the following planning obligations:
 - a) Early review of affordable housing if progress is not made within 2 years
 - b) Delivery of affordable housing in advance of private housing
 - c) Quantum and Tenure of Affordable Housing (50% - with a 44:56 tenure split in favour of shared ownership)
 - c) Improved links and signage to the Scheduled Ancient Monument
 - d) Tree reduction/removal on the Scheduled Ancient Monument
 - e) Retention of scheme architects
 - f) Provision of Travel Plan including monitoring
 - g) Local employment and training strategy
 - h) Car club spaces and membership
 - i) Restrictions on future residents obtaining parking permits
 - j) Air quality
 - k) Carbon offset payment
 - l) Landscape management and maintenance plan
 - m) Any other planning obligation(s) considered necessary by the Director of Planning and Strategic Transport
- 4.2 That the Director of Planning is delegated authority to negotiate the legal agreement indicated above.
- 4.3 That the Director of Planning is delegated authority to issue the planning permission and impose conditions [and informatives] to secure the following matters:
- 1) Development implemented in accordance with submitted drawings
 - 2) Details of materials to be submitted and approved
 - 3) The requirement to enter into Highways Agreement prior to commencement. With works completed prior to first occupation
 - 4) Detailed hard and soft landscaping maintenance/management plan
 - 5) Details of children's play space
 - 6) Details of lighting, CCTV and wayfinding
 - 7) Submission of Arb Method Statement
 - 8) Archaeological interest investigation
 - 9) Provision of SAM interpretation board within the site
 - 10) Accord with recommendations of Ecological Assessment
 - 11) EA Condition - Piling
 - 12) Details of Flood Risk Assessment and Drainage Strategy
 - 13) Water efficiency
 - 14) Sustainable development 35% carbon reduction
 - 15) Air Quality requirements
 - 16) Boilers/Energy/heating plant specifications
 - 17) Compliance with findings of Noise Assessment
 - 18) Noise standard for living rooms and bedrooms
 - 19) Noise from air handling units
 - 20) Details of mechanical ventilation equipment

- 21) Submission of low emissions strategy
- 22) Contamination - Site investigation - soil, water & gases
- 23) Car Parking Design and Management Plan (CPDMP)
- 24) Details submitted for ECVP; Disabled bays; Pedestrian routes; Cycle facilities; Refuse/Recycling; Sight lines;
- 25) Approval of sustainable travel strategy
- 26) Delivery and servicing management plan
- 27) Approval of Construction Logistics Plan
- 28) Development to commence within three years of the date of permission
- 29) Any other planning condition(s) considered necessary by the Director of Planning and Strategic Transport

Informatives

- 1) Requirement for Highway Licence and S.278 under the Highways Act
- 2) Code of Practice on Construction Sites – ‘Control of Pollution and Noise from Demolition and Construction Sites’ and ‘The Control of dust and emissions from construction and demolition’.
- 3) Historic England informatives
- 4) Thames Water informatives
- 5) Any [other] informative(s) considered necessary by the Director of Planning

- 4.4 That the Committee confirms that it has had special regard to the desirability of preserving the settings of listed buildings and features of special architectural or historic interest as required by Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 4.5 That the Committee confirms that adequate provision has been made, by the imposition of conditions, for the preservation or planting of trees as required by Section 197 of the Town and Country Planning Act 1990.

5 PROPOSAL AND LOCATION DETAILS

Proposal

- 5.1 The proposal is as follows:
- Demolition of Sovereign House the vacant hospital laundry building.
 - Replacement of the Lion Green Road car park with 116 public town centre car parking spaces
 - Erection of 5 pavilion buildings, making provision for 157 residential units
 - Block A – 7 storey containing 39 flats
 - Blocks B and D – 5 storey containing 27 and 25 flats respectively (52 across both blocks)
 - Blocks C and E – 6 storey containing 33 flats each (66 across both blocks)
 - 16 accessible units
 - Provision of 78 private and 79 affordable units (50% affordable housing)
 - 45 residential car parking spaces (including 16 disabled bays)
 - New vehicular access
 - Hard and soft landscaping works
 - New private and public amenity space

Site and Surroundings

- 5.2 The Lion Green Road site is situated to the south west side of Lion Green Road. The site is currently occupied by a Council owned public car park and Sovereign House. There are several trees within the site and there is a significant change of land levels. The PTAL is rates as 3 (moderate).
- 5.3 The site has been designated within the Croydon Local Plan for a mix of uses, including leisure, car parking and community facilities (No: 372).
- 5.4 To the north-east are two storey terrace houses, a car repair garage and a recent flatted development on the opposite side of Lion Green Road, at the corner of Brighton Road. Further to the north-east is Coulsdon Town Centre. To the south is an access road to Coulsdon Farm and a residential flatted block (Gilbert Court). Further south is the recent development at Cane Hill which is currently under construction (up to 677 units, with Phases 1 – 6 being built out). To the west is an earth embankment that once formed part of the Surrey Iron Railway, designated a Scheduled Ancient Monument.
- 5.5 Richmond Hall Scout Hut abuts the north-west corner of the site, along with an access road to the two storey properties fronting Chipstead Valley Road. Next to Richmond Hall to the west is Smitham Primary School. On the corner of Chipstead Valley Road is a post office and depot. Well Cottages are situated in Fourth Drive.
- 5.6 The site adjoins Metropolitan Green Belt which also covers the Surrey Iron Railway-Scheduled Ancient Monument. Smitham Primary School Playing Fields adjoins the scout hut building. Well Cottages are located within the Chipstead Valley Road Local Area of Special Character. The site is located within an Archaeological Priority Zone and is affected by two Local Views (LV3 of Cane Hill from Brighton Road and LV5 Portnalls Road to St Andrews Church). Lion Green Road is a Local Distributor Road. The site is also located within Flood Risk Zones 2 and 3 and within a surface water critical drainage area.
- 5.7 A Tree Preservation Order (TPO), 17 of 1972 covers Sovereign House, Lion Green Road and TPO 25 of 1993 covers trees adjoining the site relating to the Cane Hill site.

Planning History

- 5.8 Planning permission (LBC Ref 13/02178/P) was granted in July 2014 for the demolition of existing buildings and redevelopment of the site to provide a supermarket and health facility along with a new scout hut storage facility. The consent was never implemented and the permission expired in July 2017.
- 5.9 The scheme is more than 150 units, so an EIA screening opinion was undertaken. (LBC Ref 17/05542/ENVS) which confirmed that an Environmental Impact Assessment was not required.
- 5.10 Cane Hill (LBC Ref 13/02527/P) was granted for residential and commercial purposes and is under construction on site following approval of various reserved matters.

6 CONSULTATION RESPONSE

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

6.2 The following were consulted regarding the application:

6.3 **Greater London Authority/London Mayor Stage 1:** The GLA has indicated that the scheme does not comply with the London Plan and draft London Plan, suggesting that the following changes should be incorporated into the scheme:

- Land use principle: The proposed redevelopment of the site for residential use and an element of replacement town centre parking in Coulsdon District Centre is supported in line with London Plan policies but the quantum of town centre parking must be reduced.

[OFFICER COMMENT: It is considered that following wider feedback from local residents, businesses and a clear steer from Planning Committee (at pre application stage) that there is a level of demand for town centre car parking and whilst the level of retained car parking is kept to a minimum (124 spaces down to 116) the land take and organisation of the car park is designed to be as efficient as possible. The level of car parking is considered appropriate, balancing a high degree of retention but making the layout more efficient and being designed to sit comfortably yet distinctly separate to the wider residential portion of the site.]

- Affordable housing: 50% affordable housing on public land is strongly supported. The provision should be secured through a legal agreement, including an early review if an agreed level of progress is not made within 2 years.

[OFFICER COMMENT: This can be secured through a future legal agreement]

- Urban design: There are concerns with the unconventional design, specifically the long-term maintenance and management to ensure its success; a management plan must therefore be secured. Outstanding concerns regarding enhancing the sense of ownership, relationship between units and the car parking and awkward internal layouts.

[OFFICER COMMENT: The unconventional design has been reviewed by the applicants following the comments as regards the desire for more openings at the ground floor level. This suggestion was discounted given that it would be unable to provide level access given the topography with the units at ground floor providing the accessible units. Encouraging extensive private areas would have also acted against the design ethos of the landscape-first environment. A Maintenance/Management Plan will be secured via planning condition and potential legal agreement. This has always been the intent of the applicant and is seen as important to the success of the scheme. The relationship between the residential units, landscaping and car parking has been carefully designed.]

- Inclusive design: The proportion of accessible bays within the replacement town centre car park should be increased in line with London Plan.

[OFFICER COMMENT: This will form part of the Car Parking Design and Management Plan (CPDMP) which has been conditioned]

- Climate change: In order to meet the zero-carbon target for residential development, the applicant should maximise on-site carbon reductions before any remaining regulated CO2 emissions are met through a contribution to the borough's offset fund which should be secured through legal agreement.

[OFFICER COMMENT: This can be secured through a future legal agreement]

- Transport: The number of car parking spaces must be reduced. EVCPs and Blue-badge spaces should be confirmed and secured. The CPZ restrictions, car club space and membership should be secured through the s106 agreement along with

the final Travel Plan. The car parking layout and design should be revised with a car parking design and management plan secured by condition along with a construction logistics plan and delivery and servicing plan for the application to be in accordance with the transport policies of the London Plan.

[OFFICER COMMENT: This can be secured conditions and a future legal agreement]

6.4 **Transport for London:** TfL have made the following comments:

- The trip generation is acceptable and unlikely to have a significant impact on the strategic road network.
- Levels of public car parking these should be reduced in line with the London Plan policy that seeks more sustainable travel, given that there is spare capacity in the surrounding area and considers that the peak period visits to Coulsdon could be made by more sustainable means.

[OFFICER COMMENT: There is a reduction in the number of car parking spaces from the current 124 to 116. The London Plan has no parking standards for public car parks, so levels of parking should be based on the TA in conjunction with paragraph 39 of the NPPF. The parking survey demonstrates the existing car park operates near to capacity from 10:00 to 15:00 across all survey days, reaching full capacity on both the Thursday and Sunday surveys at 12:00. Policy DM30d of the Croydon Local Plan 2018 only allows the loss of existing car parking spaces where it can be demonstrated there is no need for them by reference to occupancy rates at peak times. The TA demonstrates that there is need, which combined with the aspects raised above, confirms the level of public car parking (and loss of 8 spaces) is acceptable.]

- Residential car parking is acceptable subject to provision of disabled bays and Electric Vehicle Charging Points in accordance with London Plan
[OFFICER COMMENT: This has been included as a condition]
- Car Parking Design and Management Plan (CPDMP) should be provided as part of the scheme.
[OFFICER COMMENT: This has been included as a condition]
- Car club and restrictions on future residents obtaining parking permits should be incorporated in the S106 agreement.
[OFFICER COMMENT: This can be secured through the legal agreement]
- Increase in cycle parking [OFFICER COMMENT: The scheme has been revised to accommodate cycle parking internally within the ground floor of each Block, and further provision would impact on the overall design. Furthermore the provision is in excess of the London Plan Standards and is acceptable]
- Pedestrian Environment Review Survey (PERS) and Cycling Level of Service (CLoS) should be undertaken – Any improvements identified should be secured through s106/s278 agreements
[OFFICER COMMENT: The applicant has undertaken the PERS and CLoS and recommendations can be secured through legal agreement]
- Bus Stop Assessment should also be undertaken and any improvements identified secured through s106/s278 agreements:
[OFFICER COMMENT: This can be secured through the legal agreement]
- Construction Logistics Plan
[OFFICER COMMENT: This has been included as a condition]

- 6.5 **Environment Agency:** Have identified the site is located in an area of high sensitivity with respect to Controlled Waters. The EA have raised no objection to the proposed development subject to conditions.
[OFFICER COMMENT: These requirements can be captured through use of planning conditions]
- 6.6 **East Surrey Badger Protection Society:** Recommends that a badger survey is carried out.
[OFFICER COMMENT: These requirements can be captured through use of planning conditions]
- 5.5 **Lead Local Flood Authority:** Have raised no objection to the scheme subject to a suitable condition.
[OFFICER COMMENT: These requirements can be captured through use of planning conditions]
- 5.6 **Thames Water:** No objection subject to informative relating surface water drainage and connections to sewage.
[OFFICER COMMENT: These requirements can be captured through use of planning conditions]
- 5.7 **Historic England:** Indicated that the new development impacts the Scheduled Ancient Monument as a result of the increased height and overbearing nature of the new buildings reducing visibility from Lion Green Road and would dominate the embankment. Nevertheless Historic England supports the proposals, subject to securing heritage benefits to counter the harm caused to the setting of the Scheduled Monument by the new buildings, by increasing access to and understanding of the Surrey Iron Railway embankment.
[OFFICER COMMENT: These can be secured through a combination of conditions and the future legal agreement]
- 5.8 **GLAAS:** No objection subject to conditions. Previous trench evaluation was undertaken identified burial locations. The archaeological interest should therefore be conserved by attaching a condition providing a Written Scheme of Investigation.
[OFFICER COMMENT: These requirements can be captured through use of planning conditions]
- 5.9 **Reigate & Banstead Borough Council:** No objection raised however request that Surrey County Council as Highway Authority are consulted in order that the impact on the road network can be fully considered.
- 5.10 **Surrey County Council:** No comments raised

7 LOCAL REPRESENTATION

- 7.1 A total of 101 neighbouring properties were notified about the application and invited to comment. The application has been publicised by way of one or more site notices displayed in the vicinity of the application site. The application has also been publicised in the local press. 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: 274 Objecting: 254 Supporting: 17 Comment: 3

7.2 The following local groups/societies made representations:

- Chipstead Residents Association (Objecting)
- Hooley Residents Associations (Objecting)
- Old Coulsdon Residents Association (Objecting)
- East Coulsdon Residents Association (Supporting)
- Hartley & District Residents Association (Supporting)

6.3 The following made representations:

- Councillor Mario Creatura [objecting]

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

Objections

- Lack of public parking
- Pressure on the local junctions
- Will cause grid lock
- School and rat running issues
- Loss of public parking
- Layout of the parking is not adequate
- TA assessment is inadequate
- Increasing congestion
- Underground car parking should be considered
- Lack of residential parking
- Public transport issues
- Overdevelopment – too dense
- Too tall
- Too many developments in the area e.g. Cane Hill
- Negative impact on the local businesses and economy
- Pressure on local services
- Wrong development in this area
- Loss of light, overlooking/loss of privacy
- Impact on flooding
- Impact on drainage and sewage
- Not in keeping with the Local Heritage (St Dunstons Cottages and Well Cottages)
- Impact on the SAM
- Loss of trees
- Lack of medical facilities (Doctors surgery's and dental practices)
- No gym or health facilities in Coulsdon
- Not sustainable
- Removes land from Scout Hut and Electricity substation and parking spaces
- Trains are already over crammed

Supporting comments

- Positive proposals
- High quality architectural design
- Optimising the use land

- Providing much needed affordable housing stock
- Providing the local community with a nearby medical centre
- Revitalisation of community centre/theatre.
- Improve the economy of the town centre
- Encourage the use of public transport.
- Opening up the Scheduled Ancient Monument
- Increasing access from Cane Hill

7.4 The following issues were raised in representations, but they are not material to the determination of the application:

- Right to light issue for neighbouring buildings
[OFFICER COMMENT: This is a civil matter and not a material planning consideration]
- Desire for a double decked car park
[OFFICER COMMENT: this is not part of the application so is not for consideration. Notwithstanding, this is not something officers would support]

7.5 The following procedural issues were raised in representations, and are addressed below:

- No site notices
[OFFICER COMMENT: The application was advertised by direct neighbour notification, site notice and newspaper advert]
- Underhand tactic/Submission date/Lack of time to respond
[OFFICER COMMENT: The deadline for responses was extended by a further week given the submission at during the festive season]

8 MATERIAL PLANNING CONSIDERATIONS

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

1. Principle of the proposed development
2. Housing (affordable, tenure & mix)
3. Townscape, design and heritage
4. Transport, parking and highways
5. Impact on adjoining occupiers
6. Quality of living environment provided for future residents
7. Impact on environmental conditions
8. Sustainability
9. Other planning matters

Principle of the Proposed Development

8.5 Policy SP1.1 of the Croydon Local Plan 2018 states when considering development proposals, the Council will adopt a positive approach that reflects a presumption in favour of sustainable development. SP1.3 and SP1.4 encourage growth in homes, jobs and services in sustainable places. Policy SP2.1 states the Council will apply a presumption in favour of development of new homes provided applications meet the

requirements of policy. The Plan seeks to deliver 32,890 homes over the plan period (2016-2036).

- 8.6 Policy DM37 of the Croydon Local Plan 2018 allocates the Lion Green Road car park site for mixed use development comprising leisure, community facilities and retention of car parking spaces. Policy DM19 of the Croydon Local Plan 2018 states that the Council will permit the loss of existing community facilities where it can be demonstrated that there is no need for the existing premises or land for a community use and that it no longer has the ability to serve the needs of the community.
- 8.7 The scheme proposes the erection of five residential pavilions and the retention of public car parking facilities. As such and as a standalone application, the proposal is contrary to these policies as there are no community uses proposed on the site.
- 8.8 The scheme forms part of a range of BxB proposals within Coulsdon which are reliant on each other in terms of the range of uses. Item 6.2 for development of a D1 facility (intended to be a new health centre) on land west of 41 Malcolm Road (LBC Ref 17/06218/OUT) makes provision for the communities facilities identified within the Lion Green Road allocation.
- 8.9 Whilst the site allocation also included a leisure element, given the limited capacity of the site to deliver a reasonable level of new housing (with high levels of affordable housing) as well as retaining a reasonable level of public car-parking for the centre and providing enhanced health facilities, officers are satisfied that the site is not in a position to accommodate all identified uses. It is worth noting however that the proposed extensions to the former CALAT Centre are intended to accommodate badminton and other related indoor sporting opportunities.

Housing (Affordable Housing, Tenure and Mix)

- 8.10 The Croydon Local Plan 2018 Policy SP2.4 states that to deliver affordable housing on sites able to deliver ten or more dwellings, the Council will negotiate to achieve up to 50% affordable housing, subject to viability and seek a 60:40 ratio between affordable rented homes and intermediate (including starter homes). The policy goes on to say (Policy SP2.5) that the Council will require a minimum of 30% affordable housing on the same site as the proposed development or through other means (off site or via review mechanisms) if on site provision is not viable. Policy SP2.6 advises that the Council will only accept commuted sums in lieu of affordable housing in exceptional circumstances.
- 8.11 In terms of affordable housing, the scheme proposes 50% affordable housing (by habitable room) at a ratio of 44-56 shared ownership and affordable rent (in favour of shared ownership). Whilst it is acknowledged that the site does not achieve the required tenure split, the scheme proposes affordable housing in excess of the policy minimum, with affordable housing and private sale housing being delivered on the same site. Similarly, in view of the overall level of affordable housing offered, officers consider the tenure mix to be acceptable, especially as a policy compliant tenure split would have been deliverable (with the 30% minimum requirement) and the 50% offer would deliver more affordable rented units (numerically) compared to a 30% level (delivered at 60-40). A change in tenure split will also have implications for the overall viability of the scheme and the deliverability of affordable housing and the various S.106 obligations.

- 8.12 The viability has been assessed by an independent viability advisor who has indicated that the amount of affordable housing being proposed constitutes the maximum reasonable level as the scheme will need to assist in the funding for the off-site community uses (Item 6.3 and 6.4) planning obligation requirements which are generated by both the proposed development and also the Lion Green Road Car Park site.
- 8.13 The layout of the blocks ensures that the management of the affordable rented units and shared ownership units (Blocks B, D & E) can be maintained by registered providers and can be flexible to take account of changing market. The scheme is providing 50% affordable housing which is the maximum sought at development sites, as such in delivering a significantly higher quantum of affordable housing (albeit and a slightly different mix) this represents a sound affordable housing offer in line and secures an appropriate balance between quantum of affordable housing and overall levels of affordability.
- 8.14 The GLA strongly support delivery of 50% affordable housing. The proposed tenure split at 44:56 (by habitable room) affordable rent to intermediate shared ownership meets their 30:30:40 split within the SPG London Plan which seeks at least 30% low cost rent, at least 30% intermediate provision, with the remaining 40% to be determined by the LPA. The proposed tenure split is supported by the GLA subject to an early stage review within two years of any permission being granted. This is to be secured in a future legal agreement.
- 8.15 The tranche (in terms of affordable housing delivery) seeks to deliver a policy compliant 50% affordable housing figure and the financial viability assessment has indicated that the amount of affordable housing being proposed constitutes the maximum reasonable level given that the tranche of the Coulsdon schemes are required to assist in the relocation or provision of community and health related facilities within the area.
- 8.16 Policy seeks to secure the provision of family housing and has an aspiration for 60% of all new homes outside the Croydon Opportunity Area to have three or more bedrooms. It also allows for a proportion of those three bedroom homes to be provided as 2B4P dwellings in the first 3 years of the Plan. The proposal is offering 12% of the units as 3 bedroom (or larger) homes. A further 14% of the units are 2B4P homes. This equates to 26% which is less than the 60% policy requirement in an urban location. Nevertheless, on balance officers are satisfied that considering all of the viability issues as a whole, with the delivery of 50% affordable housing at the site, the under provision of 3 bedroom units is acceptable in this case.

Townscape, Design and Heritage

- 8.17 Policy SP4 of the Croydon Local Plan requires 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.
- 8.18 The 157 units will be distributed in five individual pavilions within a verdant landscape. The project is a landscape first approach, with the five pavilion buildings designed to respond to the site's sloping topography, with each building rotated to manage the proximity between residents and to maximise views over the surrounding landscape.

All units would be dual aspect, across all tenures. The landscape first approach seeks to create quality shared amenity space surrounding the proposed residential buildings

- 8.19 The proposed scheme of five brick-detailed sculptural pavilions, set in conceptually open public landscape, is compelling in terms of concept, architectural design and representation. The scheme should be built and maintained to the standard and appearance indicated in the submitted plans, which would result in buildings and landscape of unique character and material and experiential quality, thereby creating a positive response to Coulsdon District Centre.
- 8.20 Some concerns have been raised about how the proposed scheme would present itself, in terms of urban design, planning and function throughout its lifetime. The pavilion-in-landscape approach, whilst compelling and creating a number of benefits (retention of trees, creation of flowing public landscape, interesting architectural forms, etc.) also creates some substantial challenges as follows
- how the intervening landscape is managed and maintained;
 - definition of public and private space;
 - definition of edges;
 - definition and provision of high quality public routes through the site toward the SAM and up to Cane Hill;
 - provision of active ground floors and natural surveillance and how to sensitively and unobtrusively integrate parking (including the required quantum of town centre parking), access roads and other servicing and infrastructure.
- 8.21 These challenges have been addressed to a degree through design changes at pre application stage. However concerns remain and will need to be mitigated through use of detailed conditions and specific elements with the future legal agreement; for instance requiring a detailed landscape management and maintenance plan and detailed conditions covering architectural and landscape materials and detailing.

Layout

- 8.22 The scheme provides an opportunity to create a more prominent development that would contribute to enhancing the character and functionality of Coulsdon District Centre and to facilitate regeneration. The arrangement on the site has been informed by the relatively open Lion Green Road frontage, the desire to retain the public car park and to retain views of the Scheduled Monument to the rear of the site – along with routes to and from this heritage asset.
- 8.23 The ‘pavilions-in-landscape’ concept enables publically accessible landscape to flow between buildings creating visual and physical connections up to Cane Hill; enables deployment of a repeatable building diagram (albeit each one adjusted in terms of orientation, height and details); creates opportunities for interesting outlook from and views between buildings; creates opportunities for distinctive architectural forms and unit types and creates a relatively simple method for retaining existing trees and dealing with the site’s specific typology.
- 8.24 The proposed pavilions have been arranged to focus main residential entrances towards the District Centre/Lion Green Road frontage; to keep residential uses away from Lion Green Road providing opportunities to provide generous areas of public realm; to retain a separation distance from the SAM; create opportunities for natural

surveillance of landscape; retain existing trees and create routes, spaces and permeability between blocks.

- 8.25 The public car park (116 spaces) is immediately adjacent to the main residential development and proposed landscape. It is important that the boundary between these two areas is carefully managed – to give separation as well as a soft landscaped treatment. The residential vehicle access would meander through the landscaped area with discreet areas of car parking contained within.
- 8.26 It is important that this scheme provides visual and physical access to the SAM and up to Cane Hill by way of high quality pedestrian routes. There is some concern that one of the main pedestrian access routes to the SAM from Lion Green Road would be via the proposed public car park and the perimeter road. The surface treatment of the car park and perimeter road and the design of their layout would need to be of a sufficiently high quality to accommodate a pedestrian route to the SAM and create an appropriate setting to the heritage asset. Details of this can be secured by condition.

Townscape, scale, height and massing

- 8.27 The proposed scale, height and massing is on balance supported. These aspects need to be balanced against the impacts on the SAM as well as the way that the built form might coalesce and potentially block views and appreciation of the SAM (when viewed from Lion Green Road). The arrangement of the blocks, having been positioned to provide glimpses towards the SAM.
- 8.28 The submitted verified view indicates that the proposed development would rise above existing roof-lines and would obscure some views of surrounding trees and topography when viewed from Brighton Road. This will change the character of the District Centre and the way that it is appreciated in its context (views of wooded hillsides above characteristic rooflines). However, given the limited degree of this impact, the high quality architectural design, forms and materials proposed and the inevitable evolution in character of the District Centre, it is considered acceptable on balance.

Appearance, Architecture and Materials

- 8.29 The proposed sculptural pavilion forms and the associated architectural forms and considered interesting and compelling. If delivered to the quality currently envisaged, officers are satisfied that they should make a positive contribution in terms of their form, visual interest, detailing and materiality. The use of different tones of brickwork across the pavilions is supported, as is the proposed use of brick bonds, courses and brick detailing to add texture and interest to individual buildings.
- 8.30 Apart from the now demolished Cane Hill Hospital buildings, it is relatively uncharacteristic of Coulsdon District Centre to have a number of relatively large buildings of a similar design and materiality in close proximity laid out as pavilions in a landscape. The use of brick is however characteristic of Coulsdon and the landscape-first principle enables appreciation of and enhancement of the topographical and landscape character of Coulsdon. As such an extensive set of conditions covering materials and architectural details will be required as part of any approval.

Landscape and public realm

- 8.31 The scheme proposes an accessible, green landscape flowing between the proposed pavilion buildings. Within this, more private areas are defined for use and ownership by residents. For this concept to translate successfully in delivery and long term sustainability, suitable conditions are recommended to be attached detailing: a) landscape management and maintenance plan; b) detailed hard and soft landscape and public realm information; c) details on wayfinding, CCTV and lighting; d) access and interpretation material associated with appreciation of the SAM; e) details of the proposed play facilities.
- 8.32 In respect to the local views the redevelopment of the car park would involve the replacement of low value and poorly maintained elements within the site with a well-designed and thoughtful residential development which responds positively to its townscape and visual setting. The replacement car park would also need to be well laid out using robust and attractive materials. The five pavilion buildings would need to utilise a subtle and a high quality materials palette.
- 8.33 The proposal in townscape and visual terms, would see the replacement of surface level car park with new residential apartments; re-provision car parking facilities; the creation of new communal spaces and the creation of new access to and viewing opportunities of the SAM. The effects on townscape and visual receptors are negligible and would benefit the townscape character and visual amenity. Further mitigation measures would be secured through the high quality of design, detailed soft and hard landscape and management strategy (secured through conditions) to ensure its continued contribution to the scheme and surrounding townscape.
- 8.34 With regards to Metropolitan Green Belt, the site lies adjacent to this designation and the area immediately adjacent to Green Belt is also the SAM which is proposed to be incorporated in the overall landscaped area surrounding the scheme. Consequently there would limit the harm to the openness and setting of the Green Belt. The proposed landscaping scheme would enhance the scheme and would link the site with the Coulsdon District Centre

Heritage

- 8.35 The Planning (Listed Buildings and Conservation Areas) Act 1990 provides for the definition and protection of a list of buildings and areas of architectural and historical interest. This legislation also sets out the requirement to have special regard to the desirability of preserving the building or its setting in considering any proposed development (S66). This legislation provides for the definition and protection of listed buildings as buildings with special architectural or historical interest. The Act sets out the need for local planning authorities to have special regard to the desirability of preserving the building, its setting or features of special architectural or historic interest.
- 8.36 NPPF relates specifically to the historic environment and sets out the factors that should be taken into account regarding planning decisions, including 'the desirability of new development making a positive contribution to local character and distinctiveness'. Weight is attached to conserving the significance of designated heritage assets. Paragraph 132 states that 'Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments... should be wholly exceptional. Paragraph 134 goes onto states that 'where a development proposal will lead to less than substantial harm to the significance of a designated

heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use’.

- 8.37 Policies SP4 and DM18 of the Croydon Local Plan 2018 states the Council and its partners will respect and optimise opportunities to enhance Croydon’s heritage assets, their setting and the historic landscape, including through high quality new development and public realm that respects the local character and is well integrated.
- 8.38 The proposed development is located immediately adjacent to a designated heritage asset in regard to the Scheduled Ancient Monument (SAM) that comprises a railway embankment that forms the remains of the Surrey Iron Railway, a highly important pioneering early railway. In addition, there are non-designated heritage assets of local significance nearby including Well Cottages which are located in the Local Heritage Area.
- 8.39 Both the conservation officer and Historic England highlight that the proposal causes harm to the setting of the SAM due to the proposed built form as a result of the increased height, reducing visibility from Lion Green Road also the location of the proposed car parking. Whilst the overall height of the development is required to ensure that the scheme is viable, the height impacts on views of the SAM.
- 8.40 Overall, whilst the proposed height, massing and layout successfully integrates with the general townscape, following assessment of the views submitted, it is apparent that there are some areas where the proposed development would have an impact and on the setting of surrounding heritage assets. As such a significant amount of harm is identified, although officers have concluded that the harm caused would be less than substantial.
- 8.41 Less than substantial harm can potentially be outweighed by the public benefits associated with the development. The scheme proposes increasing access to the Surrey Iron Railway embankment, both through the site and up onto the earthwork itself. Interpretation signage and landscaping works on the embankment would also be included as part of the scheme and is conditioned. A clear strategy for securing and implementing improvements to the scheduled monument should be confirmed. This would be secured through the legal agreement.
- 8.42 Whilst there would be some harm caused to the setting of non-designated assets (Local Heritage Area) however a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset. Given that the non-designated assets, in particular Well Cottages are in excess of 40m from the built forms at the site the high quality of design, the use of high quality materials and architectural expression are considered to help mitigate its impact.
- 8.43 The harm caused by the proposed scheme to the setting of heritage assets would be less than substantial. When these impacts are weighted alongside the public benefits of the proposed development, officers are satisfied that the proposed development would comply with paragraph 134 and 135 of the NPPF. Notwithstanding this, the development provides an exceptionally high design quality in relation to materials and other detailed matters at planning conditions stage. This is to ensure that the building, which is visible in the setting of heritage assets, is one of which is perceived as being of excellent contemporary design which responds appropriately to its historic context.

Archaeology

- 8.44 The site is located within an archaeological priority zone and as such the applicant has submitted an archaeological desk-based assessment. This has been assessed by GLAAS and indicated that a programme of trench evaluation was undertaken as the first stage of the earlier planning permission (LBC Ref 13/02178/P). The evaluation identified further burial locations to the two excavated in 1913 and suggest that the archaeological interest should therefore be conserved by attaching a suitably worded condition, which is recommended.

Transport, Parking and Highways Considerations

- 8.45 The Croydon Local Plan Policy SP8 sets out local requirements to promote sustainable travel and levels of parking. This will also be directed to those areas and District Centres with higher public transport accessibility. Improving connectivity assisted by improved way finding will also be important to enable a shift to more sustainable modes.
- 8.46 The application site has PTAL of 3, meaning it has moderate public transport accessibility. The site is within close proximity of two Railway Stations namely Coulsdon South (600m to the south east) and Coulsdon Town (600m to the north east).
- 8.47 The Lion Green Car Park current operates between Monday to Saturday 7am - 6pm with 124 spaces available for public parking. The TA indicates the car park is operating close to capacity with the peak period being between 10:00 and 15:00. The parking survey further highlighted that the 47% were 1-3 hours stay and 31% were less than an hour, with the main purpose of the public car park as one of shopping/visiting (49%) indicating that the car parking is important for local shopping, providing a good facility for viability of Coulsdon centre.
- 8.48 An on street parking beat survey for the existing Central Coulsdon CPZ was undertaken, which showed between 10:00 and 16:00 on the weekday over 90 available spaces were recorded and 40 and 42 available spaces were for the weekend, which corresponded with the peak time of the Lion Green Car Park. The TA also confirms that additional public and private off-street parking facilities exist in Coulsdon area.

Trip generation

- 8.49 The existing site contains 124 parking spaces and although the car park is to be reduced to 116 parking spaces, this reduction was not factored into the trip generation figures. The trip generation therefore represents worst case in terms of traffic levels and car parking accumulation.
- 8.50 The TA uses the trip rates for the proposed development obtained from the TRICS data base to determine the peak hour and daily trip rates. The forecasted average trip rates were applied to the proposed 157 residential development for the peak hour and daily trips to and from development. The assumption regarding mode split were obtained from the latest available Journey to Work Census data (2011) for the relevant output area. The approach and methodology utilised in estimating the trip generation for the development is acceptable.

- 8.51 The TA indicates that the trip generation for the residential development would equate to 29 vehicular movements (inclusive of servicing) during the AM Peak Hour (0800-0900) and 24 vehicular movements (inclusive of servicing) during the PM Peak Hour (1700-1800). The agreed methodology highlights that the distribution of vehicular trips for the scheme represents around 1 vehicular movement every 2.1 minutes (AM) and 2.5 minutes (PM). A maximum of 11 vehicles are forecast to access/egress the A23 (AM Peak) and nine (PM Peak).
- 8.52 The forecast minimal uplift would fall within the standard daily fluctuation of traffic methodology and would not have a detrimental impact on the operation or safety of the local highway network. A Travel Plan would further mitigate the forecasted impacts of the development. This can be conditioned.

Public Parking

- 8.53 The proposal includes the retention of the public car park with two new accesses from the Lion Green Road and a one way system. The car park would be laid out to provide 116 spaces and residents of the development would be required to exit the site via the public car parking area. It is also proposed that there will be separation between the residential car parking areas and the public car park.
- 8.54 The TA indicates that the surveyed existing public car parking operates near to capacity during the hours of 10:00 to 16:00 (as stated above) reaching full capacity at 12:00 on Thursday and Sunday. The survey also confirmed there was sufficient spare capacity within the Town Centre CPZ to accommodate the small reduction of 8 parking spaces in Lion Green Car Park as result of the proposed development.
- 8.55 Concerns raised by Strategic Transport in respect to access arrangement; circulation routes and parking bay layout arrangements have been addressed as part of the application (with changes to overall car parking layout and entrance/exit arrangements). A Car Parking Design and Management Plan (CPDMP) will be conditioned as part of any approval.
- 8.56 The GLA and TfL have both raised concerns in respect to the number of public car parking spaces being provided. Whilst they have acknowledged that there is a slight reduction in parking and that there is a need to provide some town centre parking spaces to ensure the continued vitality and viability of the town centre, they state the quantum should be further reduced, in line with the objectives of the London Plan. This seeks to reduce car dependency and discourages the provision of surface car parking, in order to make efficient use of land.
- 8.57 Policy DM30(d) states that new development that would result in the loss of existing car parking spaces, needs to demonstrate that there is no need for these car parking spaces by reference to occupancy rates at peak times. The submitted TA demonstrates the car park is near capacity on several occasions. The survey was undertaken with the 124 spaces currently on site, as such the 8 space reduction to 116 spaces would reach capacity more regularly. It is acknowledged that there is a reduction in the current provision, but it is of note that there is already a significant reduction from what historically existed on the site (over 100 spaces) and that this provision for the level of public parking on Lion Green Road is acceptable.

8.58 Overall, it is given the high level of use of the public car park, combined with the PTAL and the increase in the intensification of the site in terms of the residential use, the quantum of the public car parking is appropriate for the site.

Residential Parking

8.59 The proposal would provide 45 residential car parking spaces for the 157 units (0.29 spaces per unit). 10% of these residential units would be disabled accessible parking bays. In compliance with London Plan, 20% of the proposed residential parking bays would have active and passive Electric Vehicle Charging points and installation facilities.

8.60 Strategic Transport welcomes the provision of an onsite car club and this can be secured through the future legal agreement. Strategic Transport further welcomes the mitigation measures within the Travel Plan, the restriction placed on residents to applying for on-street parking permits and the delivery of a Construction Logistic Plan, which can be secured through a combination of conditions and future legal agreements.

Servicing/Delivery Trip generation

8.61 The Servicing/Delivery vehicle trips to the site has been estimated based on the database with a number similar developments within Greater London. The total estimated AM and PM peak service vehicle trips in and out of the development would be two for each period. Similarly, 10 daily trips to and from the site is forecasted by the TA for the proposed development.

8.62 Residential serving and deliveries (including refuse collection) would be from dedicated areas which permit other vehicles to overtake. The TA also confirms with the proposed access to the residential units having a clear minimum width of 3.7m, it allows Fire Tenders to access dry riser inlets.

Cycle provision

8.63 220 secure residential long stay cycle facilities in compliance the London Plan would be integrated into the residential units which is strongly supported. Also 4 short stay cycle spaces would be located at easily accessible locations. The scheme would accord with policy.

Impact on Adjoining Residents

8.64 The Croydon Local Plan Policy SP4 seeks to respect and enhance character to create sustainable communities and enhance social cohesion and well-being and ensures that the amenity of the occupiers of adjoining buildings are protected.

8.65 The properties that have the most potential to be affected are those fronting Lion Green Road; Gilbert Court; new occupiers within Cane Hill and Wells Cottages.

Lion Green Road

8.66 No harmful overlooking or loss of privacy would occur in relation to residential properties located on the opposite side of Lion Green Road, given that they would be

separated by Lion Green Road itself (16m – 32m away). Furthermore, there would be no direct overlooking of the houses given the orientation of the fenestration within the closest blocks (D and E).

- 8.67 Whilst there would be some impact on outlook from the properties located in Lion Green Road, the improvements to the public realm along this section of Lion Green Road (subject to detailed conditions) would provide an enhanced high quality landscaping and buildings set back from Lion Green Road.

Gilbert Court and Cane Hill

- 8.68 Gilbert Court and Cane Hill are both set at a higher level, compared to the application site and whilst the proposed development would rise (at its maximum) to around 25 metres, the relationship between the proposed development and these neighbouring sites would be acceptable; especially when one takes into account existing landscaping and boundary screening. Block A would be located approximately 20m at its closest point from these neighbouring properties which should provide adequate protection (in terms of window to window separation and outlook) especially in view of existing and proposed landscaping.

Wells Cottages

- 8.69 These units are well set back from the development in excess of 30m which would be of sufficient distance so as to not cause significant harm. The arrangement in relation to these neighbouring properties would not result in an unacceptable loss of privacy.
- 8.70 In regard to the visual impact of the development currently there are existing large trees, Sovereign House, car park and poor quality landscaping between the sites. The proposed buildings would be of a high design quality and given the landscaping enhancements to be conditioned the proposal would offer an acceptable outlook for these properties.
- 8.71 Any remaining buildings within the district centre are either commercial properties or are located sufficiently separated and orientated from the site for there to be no loss of amenity.

Daylight/Sunlight

- 8.72 A daylight and sunlight report has been submitted which demonstrates the impact of the development on the nearest residential properties, namely those at Lion Green Road; Gilbert Court; Cane Hill; Wells Cottages and Chipstead Valley Road. These have been assessed in accordance with the BRE Guidelines.

Daylight

- 8.73 In regard to the Vertical Sky Component assessment of daylight to existing nearby residential properties highlighted that of the 221 windows tested, 209 have been identified to satisfy with the BRE recommendation representing a total of 94.6% of windows. The only windows below the BRE criteria, which are those at 16-25 Lion Green Road and Gilbert Court that were already below the recommended BRE criteria in the baseline condition. As such the impact of the proposed development is in the

low to medium category. Therefore the change in terms of perceived internal daylight is not likely to be significant and the impact of the development is considered negligible.

Sunlight

- 8.74 The results of the sunlight assessments demonstrate that of the 185 windows tested, 2 windows (at 16-25 Lion Green Road) that would fall below the recommended number of sunlight hours in winter. Therefore, the proposed development has a minor to negligible impact on the sunlight on the windows of the surroundings properties.
- 8.75 The proposed development will have only a minor to negligible impact on daylight and sunlight of the surrounding properties with windows and open spaces of neighbouring properties being unaffected or only marginally affected.

Noise and disturbance

- 8.76 It is acknowledged that in terms of the existing context there would be an increase in general noise and disturbance given the development of the site for residential uses. Given the surrounding area and location within a district centre, where a degree of noise and disturbance is not uncommon, this is not sufficient reason to warrant a refusal in this instance. The Council's Environmental Health officers have raised no objection to the scheme in terms of noise disturbance subject to the imposition of several planning conditions.
- 8.77 During construction there would be a short term and temporary impact on neighbouring occupiers. A construction methodology and construction logistics plan would ensure the build-phase is managed appropriately, minimising disturbance towards neighbouring properties and is conditioned.
- 8.78 Impacts from light pollution can be controlled by planning condition.

Quality of living environment provided for future residents

- 8.79 Policy SP2.8 of the Croydon Local Plan indicates that housing should cater for residents' changing needs over their lifetime and contribute to creating sustainable communities. Individual units will be expected to meet the standards set out in the London Housing SPG.
- 8.80 The development would comply with NDDS residential standards in terms of internal floor areas and all units are dual aspect and all of the units would also meet the requirements in relation to amenity space, both the quantum and minimum dimensions. Accordingly, the living conditions provided for future residents would be acceptable.
- 8.81 A daylighting assessment has been undertaken for the proposed units and has concluded that the development will receive adequate daylight levels according to the BRE guidance. Of the 395 rooms proposed 391 are above the minimum recommended Average Daylight Factor (ADF), representing 99% of total units. Furthermore all rooms have a direct view of the sky in more than 80% of the room area and comply with the room depth criterion, as such all units and habitable rooms comply with the BRE guidance.

- 8.82 In terms of overshadowing assessment on the amenity spaces within the scheme, the proposed communal amenity spaces would satisfy the BRE criteria in that at least half the area receives at least two hours of sunlight on 21st March. These spaces are largely unobstructed and would receive good levels of sunlight.
- 8.83 Given the location with Lion Green Road and the public car park to be retained, the main background noise would be traffic movements which would require residential windows to be properly insulated which could be achieved through an appropriate glazing strategy. Furthermore, a ventilation strategy should be secured. Both would be secured by condition.
- 8.84 The Environmental Health Officer has requested that proposed fixed-plant should be designed to comply with the rating level criteria at least 10dB below existing background noise levels and the details shall be fully implemented prior to the occupation. This can also be secured through a condition.
- 8.85 The London Plan states that development proposals that include housing should make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs. The expected child yield is 33, resulting in a requirement for 329 sq.m of playspace of which 165 sq.m should be doorstep play for under 5s. The scheme has identified 358 sq.m of dedicated on-site play space within the landscaped areas between the proposed blocks. This can be secured through condition.

Accessibility

- 8.86 The scheme is in accordance with the London Plan in that 90% of new housing needs to meet Building Regulation requirement M4 (2) 'accessible and adaptable dwellings' and 10% of new housing would need to meet Building Regulation requirement M4 (3) 'wheelchair user dwellings',. The ground floor of each of the pavilions contains three wheelchair accessible units that would meet the M4 (3) Building Regulation requirement, with a further unit on the first floor of Block D also meeting the requirement that would be in excess of the 10% requirement.
- 8.87 There are 16 disabled parking spaces provided in the residential area which equates to one space per unit which is in line with the guidance of the London Plan and Accessible London SPG.

Impact on Environmental Conditions

Trees

- 8.88 Policy DM28 of the Croydon Local Plan seeks to protect and enhance the woodlands, trees and hedgerows by not permitting development that results in the avoidable loss or the excessive pruning of preserved trees or retained trees where they make a contribution to the character of the area.
- 8.89 The overarching concept of this proposal is a landscape first principle and the scheme seeks to retain as many existing trees and provide a number of replacement trees into the design.

- 8.90 A Tree Preservation Order (TPO) 17 of 1972 covers Sovereign House, Lion Green Road which identifies eight sycamore trees and one ash tree which are protected under the TPO. The Arb Impact Assessment (AIA) recorded these trees as Category C specimens and are subject of heavy ivy colonisation which substantially lessens their visual appeal.
- 8.91 The previous (now expired) planning permission (LBC Ref: 13/02178/P) agreed to the removal of 46 trees and 2 groups at the site and was considered acceptable. The submitted AIA report confirms the current scheme requires a similar level of removal, with 57 trees in total being removed. The majority of these are low quality (Category C trees) including those subject to the TPO and it is inevitable that 14 trees included within the TPO group would be lost to facilitate the loss of Sovereign House and the siting of the pavilion blocks.
- 8.92 The loss of these trees can be suitably mitigated through the implementation of an appropriate landscaping scheme. Nevertheless the scheme has resulted in the sustainable retention of one group of Category B trees, partial retention of one group of Category B trees, the further retention of one group of Category C trees and partial retention of four groups of Category C trees.
- 8.93 Some incursions into the root protection areas of retained trees will occur, but all trees can be sustainably retained through the use of appropriate protection measures including tree protection fencing, temporary ground protection, retention of existing sub-base where possible. The proposal will not result in any additional pressure being placed upon existing trees and will not adversely affect their future growth or development.
- 8.94 The Tree Officer has raised concerns on the feasibility of the path through the copse given that several of the retained trees appear to be beneath the path on the tree protection plan. This will need to be addressed through a detailed landscaping plan and tree protection measures.
- 8.95 The Council's arborist has requested substantial tree planting to the front of the site given the earlier removal of a number of mature trees following works carried out by UKPN (UK Power Network). A detailed landscaping plan will be conditioned.

Flooding

- 8.96 The Croydon Local Plan 2018 states at Policy DM25 that the Council will seek to reduce flood risk and through steering development to lower risk of flooding and applying the sequential test to minimise the risk of flooding.
- 8.97 The site is located within Flood Zone 1 as designated by the EA (i.e. a low probability of flooding) however it is also situated within a Critical Drainage Area. The Strategic Flood Risk Assessment does not map any groundwater flooding incidents within 500m of the site, although these are often unreported. There are historic accounts of high groundwater and springs in the region of the site believed to be associated with the Merstham Bourne and its influence on groundwater levels should be considered in the drainage design.
- 8.98 The applicants have submitted a Flood Risk Assessment and Drainage Strategy which has considered the risks associated with the Merstham Bourne and surface water.

FLAG has raised issues in regard to Merstham Bourne (or Coulsdon Bourne); soakaway drainage impedence and sewer capacity. The LLFA have reviewed these concerns alongside the FRA and have raised no objection to the scheme subject to conditions being attached to any approval.

- 8.99 The EA have raised no objection to the scheme subject to conditions that have been attached. Furthermore, Thames water also have no objection; their comments have been included as informatives.

Ecology

- 8.100 A Preliminary Ecological Appraisal (PEA) was undertaken in March 2017, and updated in November 2017. The results of the desk study, Phase 1 habitat survey and protected species assessment showed the potential presence of several protected species or species of conservation concern within the site, or within the immediate surroundings including bats, birds and reptiles. The PEA recommends that further survey and/ or mitigation measures is identified. These should be undertaken prior to commencement and can be secured through a condition.

- 8.101 This was similar to the previous approval where mitigation measures were recommended and conditioned. Therefore subject to conditions the impact on nature conservation is acceptable.

Air Quality

- 8.102 The applicant have submitted an Air Quality Assessment highlight that there is a medium risk of adverse air quality impacts if no measures are put in place to mitigate the impacts of the construction phase. The Environmental Health officer has assessed the report which highlights that the air quality assessment has shown that the proposed Development is air quality neutral for building emissions but not air quality neutral for transport emissions and further mitigation is required. Onsite mitigation measures such as the development of a travel plan, installation of electric charging points, passive provision and the provision of car club spaces can be secured through conditions. This will ensure that these issues are suitably mitigated to ensure that the development proposals comply with national and local policy for air quality.

Contamination

- 8.103 Policy DM23 of the Croydon Local Plan states the Council will promote high standards of development and construction to ensure that future development, would not be detrimental to the health, safety and amenity of users of the site or surrounding land.
- 8.104 The applicants have submitted a Preliminary Risk Assessment Report which has been reviewed by the Councils Environmental Consultants who confirm that there are potentially contaminative onsite and offsite land uses. Subject to the imposition of a condition, requiring an intrusive ground investigation to be undertaken, along with the Environment Agency requirements, and accordingly the development would not have an unacceptable impact in this regard.

Sustainability

- 8.105 Policy SP6 of the Croydon Local Plan seeks new developments to reduce energy and carbon dioxide and to incorporate sustainable design and construction methods.
- 8.106 New development should make the fullest contribution to minimising carbon dioxide emissions and should incorporate on site renewable energy generation. New dwellings need to achieve 'zero carbon' which sets a minimum level of CO2 reduction that must be achieved by on-site measures, with the remaining emissions then offset via 'Allowable Solutions' off-site. Where sites cannot achieve 'zero carbon' on its own it would help meet developers' CO2 reduction targets up to 2016.
- 8.107 The applicant has submitted an Energy and Sustainability Report which indicates that the scheme would achieve a 36% reduction against Building Regulations 2013 through the installation of solar PV. This is the minimum accepted on site.
- 8.108 Whilst zero carbon should be met on-site; where it is clearly demonstrated that the specific targets cannot be fully achieved on-site, as has been confirmed in the submission, any shortfall must be provided off-site or through a cash in lieu contribution which could be secured through a legal agreement.
- 8.109 In addition to this the domestic water consumption target of 110 litre/person/day can be secured by condition.

Other Matters

Impact on local services (i.e. schools)

- 8.110 The development would be CIL liable. The levy amount has been calculated to ensure that the development contributes to meeting the need for physical and social infrastructure, including educational and healthcare facilities.

9 CONCLUSIONS

- 9.1 All other relevant policies and considerations, including equalities, have been taken into account. Planning permission should be granted for the reasons set out above. The details of the decision are set out in the RECOMMENDATION.