

1 DETAILS OF THE DEVELOPMENT

Ref: 20/02134/PRE
Location: 20-24 Mayday Road, Thornton Heath, CR7 7HL
Ward: West Thornton
Description: Demolition of existing commercial (light industrial) buildings.
Erection of replacement residential buildings providing (circa) 64 new dwellings with associated amenity space, parking, landscaping
Drawing Nos: Pre-application design document V8 (December 2020), 3022_GA-P-V37 – all plans (December 2020)
Applicant: Aitch Group
Agent: Strutt & Parker Ltd
Case Officer: Paul Young

- 1.1 This proposed development is being reported to Planning Committee to enable Members to view it at pre application stage and to comment upon it. The development does not constitute an application for planning permission and any comments made upon it are provisional, and subject to full consideration of any subsequent application, including any comments received as a result of consultation, publicity and notification.
- 1.2 It should be noted that this report represents a snapshot in time, with negotiations and dialogue on-going. The plans and information provided to date are indicative only and as such the depth of analysis provided corresponds with the scope of information that has been made available to Council officers. Other issues may arise as more detail is provided and the depth of analysis expanded upon.
- 1.3 This pre-application report aims to provide Members with sufficient information for effective engagement with the scheme, and covers the following points:
 - a. Executive summary
 - b. Site and surroundings
 - c. Proposal
 - d. Place Review Panel feedback
 - e. Material planning considerations
 - f. Specific feedback requested

2 EXECUTIVE SUMMARY

- 2.1 This pre-application proposes the demolition of the existing light industrial buildings on site and proposes a residential redevelopment comprising circa 64 residential units, with around 3 accessible parking spaces (depending on the exact number of units), associated private and communal amenity space, waste/cycle stores and other associated works.

- 2.2 This pre-app scheme has developed through a series of pre-application meetings between the applicant/agent and Council officers, which previously led to the development of 3 main 'options' which were considered by the Place Review Panel (PRP) on the 17th September. Following PRP, the applicant revised their approach to the site and presented revised options in late 2020.
- 2.3 Discussions so far have focused on the principle of the development, the distribution of scale/bulk/height across the site, the design approach to the development and its visual relationship with surrounding buildings (including the nearby locally Listed building), and impacts on the neighbouring developments (in terms of light/outlook/privacy etc).
- 2.4 As noted, the applicant has put forward a "preferred option" for committee consideration but has also been exploring different forms and layouts throughout this process and following advice from the Council's Placemaking Team and the Place Review Panel.

3 BACKGROUND

Site and Surroundings

- 3.1 The site in question has an area of approximately 0.47ha and contains a collection of (generally warehouse style) buildings. It has been occupied by Boydon's tiles for a number of years. Historic photos suggest that the site was laid out with a tile showroom to the front of the site (fronting onto Mayday Road), with a number of warehouse type buildings to the rear primarily used for the storage (and distribution) of tiles, in addition to some ancillary office space. Given the layout of the site and buildings, it is considered that its primary function (and lawful use) is B8, although it is possible given the various other functions of the site that it had a mixed use comprising storage/distribution as well as office, showroom and light manufacturing functions.
- 3.2 The site is broadly level, and is surrounded primarily by residential uses, primarily in the form of blocks of flats of various heights and forms (of which one to the south is currently under construction), but other smaller scale commercial and residential developments exist – such as the bungalows located to the east and the two storey part commercial, part residential developments which front onto Mayday Road (26-32 Mayday Road). A Locally Listed building (non-designated heritage asset) is present to the west of the site (at number 2-4 Mayday Road)
- 3.3 The site has a moderate Public Transport Accessibility Level (PTAL) of 3, but does lie within, and is surrounded by, Controlled Parking Zones. The site is largely free from any significant trees or landscaping features, although there are a few mature trees located just outside the site to the south east. The site lies within an archaeological priority area and has a low (1 in 1000 year) risk of surface water flooding.
- 3.4 The site is not currently allocated in the Croydon Local Plan (2018), although an Issues and Options consultation (published November 2019) lists the site as a 'Proposed Site Allocation for mixed used residential and industrial/warehousing development with an indicative capacity of 20-74 homes.' However, as this is at

a very early stage, this potential allocation should be given minimal planning assessment weight.

Planning History

3.5 The relevant planning history of the site (and of adjoining sites) is set out under the table below:

Address and Reference	Description	Decision	Date
APPLICATION SITE			
20-24 Mayday Road 10/00190/P	Demolition of the existing buildings; erection of 1 three storey, 1 three/four storey and 1 four/five storey building comprising a total of 5 one bedroom, 35 two bedroom, 17 three bedroom and 3 four bedroom flats; formation of access road and provision of 25 parking spaces.	Refused	26.04.2010
NEARBY SITES			
Land To The Rear Of 9-17 Campbell Road 17/06194/FUL	Demolition of all existing buildings and the erection of a part two/part four storey building consisting of 8 x three bedroom flats, 6 x two bedroom flats and 8 x one bedroom flats, with associated refuse and cycle storage and the provision of a new access road and 13 car parking spaces.	Permission Granted	03.01.2019

3.6 Application 10/00190/P was refused for 5 reasons, relating to loss of employment land, scale, quality of accommodation, harm to neighbouring amenities (in terms of privacy and visual intrusion) and safety/security.

3.7 At the time of writing this report, the residential development to the south (reference 17/06194/FUL) was nearing completion, and the applicant has included/considered this development as part of their proposal.

4 PROPOSAL

4.1 Following the feedback from the PRP, the applicant has put forward a revised “preferred option,” and feedback on this was provided to the applicant at the latest meeting in late 2020.

4.2 This option consists of the demolition of the existing buildings on the site and the erection of 3 x residential apartment blocks comprising circa 64 residential

units (25 x 1 bedroom, 35 x 2 bedroom and 4 x 3 bedroom units), with approximately 3 accessible parking spaces, private and communal amenity space and associated cycle and waste stores.

4.3 The northern entrance/block would comprise a four storey 'double' dual pitched gable ended block with the main site/vehicular access to the side. Behind this would lie two other linear 4.5 storey residential blocks separated by a landscaped area. One of the proposed blocks would be L-shaped and would continue to 'turn the corner' towards the south-eastern corner of the site. A Ground Floor Plan and Aerial CGI's of the proposed development are shown below (more details will be provided in the 'Townscape' Section of the report).







3 PLACE REVIEW PANEL (PRP) RESPONSE

- 3.1 A different scheme was presented to PRP on 17th September 2020. The preferred option which was presented to PRP proposed three residential blocks with the bulk, scale massing and layout as shown in the plans below. This option focussed the bulk of the development in the central block, which proposed a part 5 storey, part 7 storey building, with a four storey block in the SW corner. Plans, CGI's of this option are presented below:



address 38 Union Street London SE1 0NU **phone** 020 7770 1100
email info@hmc.org.uk **web** www.hmc.org.uk
job 20/24/16/16/16 Road **drawn** MD **date** FEB 2020
location Humber Heath, Chichester, CB7 7NL
drawing Complete development **scale** 1:100 @ A3 **job number** 1522
drawing number 1522-01-01 **sheet** 1 of 1
 This document is for the use of the client only and is not to be distributed to any other party without the written consent of the architect.

no.	date	description	drawn	checked
001	2020	100% issued for planning	MD	MD

- 1B2P
- 2B4P
- 1B2P WCH
- 2B3P WCH
- TER
- CYCLES
- PLANT
- REFUSE



Ground Floor Plan





The Panel provide the following (summarised) concerns in response:

- Design approach/rationale to the site ('engineered')
- Overall scale, density, and massing
- Level of car parking, siting and 'entrance' environment
- Quality of the proposed units, cores, and communal space
- Lack of variety in the typology of the units
- High Percentage of single aspect units
- Permeability of the site and entrance to main and third (SE) block
- Impacts on redevelopment potential of surrounding sites.
- Impact on neighbouring amenities (light/outlook/privacy).

3.2 Generally, the panel stated that the applicant needed to develop a much more convincing rationale and strategy for the site, and that they should reconsider the number of units and instead focus more on the liveability and human aspects of the design.

3.3 The Panel considered that 45-50 units would be more appropriate and advised the Applicant to test alternative options based on this quantum.

4 MATERIAL PLANNING CONSIDERATIONS

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

- Principle of Proposed Development
- Townscape, Character and Design
- Impact on the amenities of surrounding Residents

- Mix and Quality of Accommodation Provided
- Affordable Housing
- Transport, Highways and Servicing of Development
- Other Matters

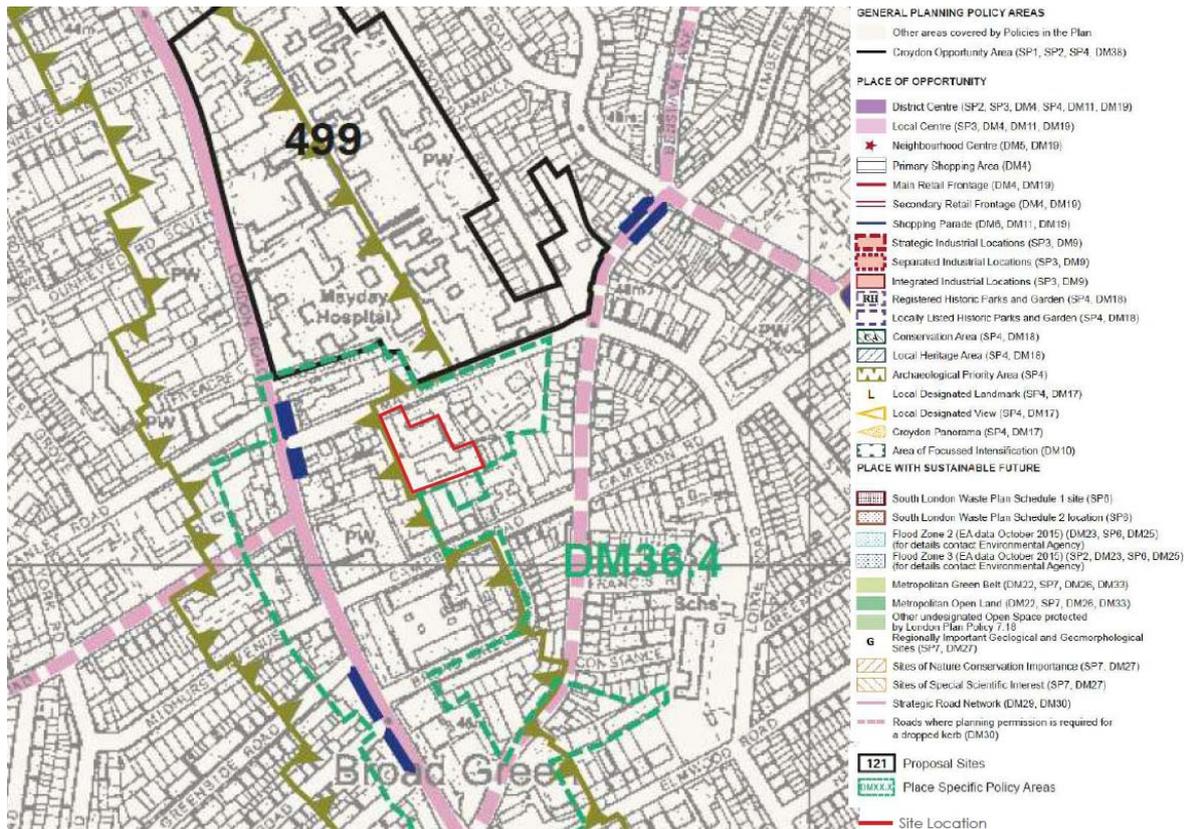
Principle of proposed development

- 4.2 The site is designated "scattered employment site" within Policy SP3 of the 2018 Local Plan. Policy SP3 states that on scattered employment sites (such as the application site), planning permission for limited residential development will be granted if it can be demonstrated that:
- There is no demand for the existing premises or for a scheme comprised solely of the permitted uses;
 - Residential use does not harm the wider location's business function
 - Opportunities for employment and skills training will be considered via Section 106 where possible.
- 4.3 In the subtext of the Policy it states that in order to demonstrate that there is no demand for a scheme comprised solely of Class B1b and B1c, B2 and B8 uses, evidence will need to be submitted that a marketing exercise has been undertaken for a minimum of 18 months.
- 4.4 Members may be aware that substantive changes to the Use Classes Order which came into force in September 2020. These changes revoked use Class B1 (including parts a,b and c) and replaced it with Class E which has a number of sub-classes (a)-(g). Classes B2 and B8 however remain unchanged. As the lawful use of the site is considered to be B8, the application of Policy SP3 remains unaltered by these use class changes.
- 4.5 The applicant has indicated that they can provide evidence in excess of 18 months marketing (albeit across three separate periods).
- 4.6 The Council is satisfied with the information provided for the second period and part of the third period. However, this marketing period does not meet/cover the 18 month (continuous) timeframe set out under Policy SP3. As such, the principle of the development is not (yet) considered acceptable.

Townscape, Character and Design

Place Specific Policy and Height

- 4.7 The site is located near London Road and within the area designated in the Croydon Local Plan (2018) for the Place Specific Policy DM36.4 (see extract map below). This policy outlines that new development should complement the existing predominant building heights of 3-8 storeys.



Croydon Policy Map – London Road and Place Specific Policy DM36.4

- 4.8 The site comprises a vacant commercial premises that is accessed via Mayday Road. Either side of the site access onto Mayday Road are two and three storey semi-detached properties, however there is a mixed building vernacular and heights on Mayday Road. Immediately opposite the site entrance is a six storey residential block (Dakota House) and further along Mayday Road to the east are three storey hospital buildings, two storey commercial buildings, two residential bungalows and an eight storey residential block. Immediately to the west of the site also set off Mayday Road is a three storey flatted residential development. Immediately to the east lies a two storey commercial building along with residential garages. To the south is a development site which has consent for a two-four storey residential flatted building.
- 4.9 Proposals on this site have the potential to unify a disjointed Mayday Road and set the tone for future development, by improving the quality of the built environment and public realm, and create a residential community set back and largely sheltered from the public streetscene. The aerial photo below highlights the site in the context with its surroundings as well as highlighting the heights of these surrounding developments. It is followed by a couple of photos of the existing site (taken by officers).



Aerial view_bing map

Rear of Site Facing Mayday Road



View towards SE corner of site



Approved development to rear of Campbell Road



Bulk/Scale and Design

- 4.10 London Plan Policy 3.4 would recommend a density of around 200-450 habitable room per hectare on this site. The proposal would constitute a density of 364 habitable rooms per hectare (or 136 units/hectare) which would be within this suggested range.

4.11 The applicant's preferred proposal primarily ranges between 4-5 storeys in height. The Block facing Mayday Road has 4 storey. The block immediately behind this is 4 stories with a further storey set in to form a reduced 5 storey. The largest L-shaped block would gradually increase in height from 2 storeys to the North, up to 4, then 5 storeys and would reduce back down to 4, then 3 stories as the building 'turns the corner' toward the South-Eastern corner of the site.

4.12 The relationship between the proposed buildings as you move from Mayday Road to the Southern part of the site is demonstrated by the series of CGIs of the development presented below. NOTE: the proposed vegetation in between the buildings has been removed for clarity:

a) View from Mayday Road



b) View between rear linear blocks



c) View from car park towards L-shaped block



d) View Looking NE towards L-shaped block



e) View looking West towards rear linear block



4.13 Officers have requested that critical character analysis at a variety of scales is used to generate different layouts and massing options to create proposals reflect positive aspects of the local character and to test these options against site constraints and the following guiding principles:

- Relationship between massing/character on adjacent sites
- Approach to landscape
- Navigation
- Considering wider masterplan/connectivity
- Noisy spaces
- How to create a neighbourhood – who will live here?
- Sustainable site approaches/massing

4.14 Officers consider that the height and massing may still be too great in places, particularly in relation to the largest L-shaped block, and particularly in the South eastern section just after it ‘turns the corner’. Concerns have also been raised about the lower level elements to the north of block B (where it meets the boundary with numbers 28 and 30 Mayday Road), as well as where block C meets the boundary with the new flatted development on Campbell Road. It is considered that these elements do not relate particularly well with the main blocks (B&C) could be removed to introduce more of an immediate ‘relief’ from

built development along the shared boundaries with the surrounding sites at 28/30 Mayday and Campbell Road, which could be further softened with some additional vegetation/soft landscaping. Discussions surrounding a reduced footprint for these areas but an increased height (more in line with the main blocks) have been held to meet these aims whilst minimising the loss of residential accommodation.

- 4.15 Member's opinion of layout and massing options, alongside appropriate height would be welcomed.

Access, Public Realm and Amenity Spaces

- 4.16 The site is relatively constrained with only a single point of access and proximity of neighbours. All preferred options (including those presented to PRP) that have been presented over the pre-app process follow a similar entrance sequence with an identical street facing block and access road hugging the boundary with the neighbouring semi-detached building and a car parking area located behind the first block (Block A)
- 4.17 Officer and PRP suggestions regarding the approach to the landscape/public realm, the navigability of the site and the positioning of buildings have been taken on board to a greater degree with this preferred proposal, and the introduction of the centralised landscape and amenity areas are supported. Similarly, the proposed car parking area to the rear of the Mayday Road block has been reduced in size.
- 4.18 Members' opinion on navigation and the quality of public realm would be welcomed.

Elevational Treatments

- 4.19 The design development has been focusing on site layout and massing to date, although the elevation treatment of the blocks have been (provisionally) developed as shown in the aerial views presented earlier and above.
- 4.20 General elevational treatments consists of red brick, flat plate steel balustrades and aluminium panel to match windows with features in white GRC panel.
- 4.21 Officers have raised concerns about the amount of white GRC panelling and asked for a detailed character appraisal to be undertaken to inform material design development.

Heritage

- 4.22 There are some nearby heritage assets that the proposals may impact their settings, these are the locally listed buildings Coach House (2-4 Mayday Road) and part of the Mayday University Hospital, additionally there is the Grade II listed West Croydon United Reformed Church on the corner Mayday Road with London Road. The applicant team have provided a heritage statement although no views have as yet been provided to fully demonstrate the impact of the proposed massing on these assets. Notwithstanding, given the distances to these assets, it is considered unlikely that the proposal would result in any discernible harm.



Impact on the amenities of Surrounding Residents

- 4.23 As noted previously, the site is primarily surrounded by residential properties. In particular, the recently constructed block to the south, and the older 'multicoloured' block to the west (Number 18 Mayday Road – flats 1-33) both have significant numbers of habitable room windows which face onto the application site. This will act to constrain development close to these shared boundaries (and beyond) due to potential harm in terms of light, outlook, and overlooking.
- 4.24 In relation to overlooking, the Council's SPD recommends that a separation distance of 18m be retained between facing habitable room windows (or balcony railings) of proposed and existing (third party) windows/developments, and a distance of at least 12m between habitable room windows within the development itself. Adopted Planning Policy DM10.6 also protects the first 10m of private rear garden to the rear of any existing dwellings (such as the bungalows to the east). Some conflicts with this policy and the SPD guidance are apparent in the preferred option – the agent has been advised in relation to these and potential solutions (such as window relocation, louvres, angled windows etc) as set out in the SPD have been highlighted in pre-app discussions.
- 4.25 In relation to daylight and sunlight, British Research Establishment Guidelines, and specifically the 25 degree 'rule' within these guidelines has been taken into consideration when determining the placing of massing and the development of the options. Note that this is however this 'rule' work as a guide, and any conflict with this 'rule' may not necessarily be harmful – instead further exploration through a daylight and sunlight (D&S) assessment would be required. At the time of writing this has not been provided. As such, officers do have concerns about the impacts on these occupiers, particularly in the two flatted developments to the south and west of the site and to a lesser extent, the occupiers situated above

the commercial units along Mayday Road (numbers 26-30). A fair amount of massing would be located close to the shared boundary with number 32 Mayday, but it is noted that this is an auto facility, protected under Policy SP3 and characterised by a large warehouse building/extension to the rear, and as such no harm to residential amenity is apparent at this stage.

Mix and Quality of Accommodation Provided

- 4.26 Policy SP2.7 of the 2018 Local Plan states that the Council will seek to ensure that a choice of homes is available in the borough that will address the borough's need for homes of different sizes, particularly for small family units.
- 4.27 Policy DM1.1 would require 60% of the proposed units to be 3 bedroom (plus) dwellings on this site. Policy DM1.1 does set out some acceptable exceptions to this (under paragraphs a and b), but as the Local Plan is nearly 3 years old (as of February 2021), only paragraph a) will remain valid if/when an application on this site is assessed, which states that the 3 bedroom requirement can be waived for the affordable housing element of a proposal where there is agreement with the associated affordable housing provider that three or more bedroom dwellings are neither viable nor needed.
- 4.28 The proposed development would provide 4 x 3 bedroom flats, which equates to 6.3%, and so would fall significantly below the required 60%. This is a matter that the applicant will need to address and resolve.
- 4.29 In relation to the quality of the accommodation provided, Policy 3.5 of the 2016 London Plan states that housing developments should be of the highest quality, internally, externally and in relation to their context and to the wider environment. It indicates that the design of all new housing should enhance the quality of local places, taking into account physical context and local character. Policy 3.5 sets out minimum GIA standards for new residential developments.
- 4.30 In addition to the above, Policy DM10.4 sets out standards for private amenity space for dwellings of various sizes.
- 4.31 The preferred option proposes three buildings with 3 cores providing around 64 units. The applicant has expressed their intention to meet Policy requirements in terms of WC adaptable units (at 10%) and DDA parking spaces (at 5%) it will therefore be necessary for lifts to be provided in each block. Similarly, the applicant has set out their intention to comply with London Plan GIA standards and the private amenity standards set out with Policy DM10.4.
- 4.32 Detailed internal floorplans have not been provided as yet and so limited assessment can be made on the quality of the proposed units or the developments compliance with accessibility standards, some single aspect flats have been noted which should be kept to a minimum.
- 4.33 Preliminary landscaping plans have been provided demonstrating that communal amenity space and playspace would be provided with natural surveillance from the proposed units.

- 4.34 Member's opinion on the mix and quality of the units and the proposed landscaping and communal space and how it relates to the built development is welcomed.

Affordable Housing

- 4.35 In the latest meeting with the agent/applicant, some indications were given that discussions were ongoing with a registered provider to provide a large % of the units as affordable units. However, at the time of writing, no formal details have been provided in regards to this, or the affordable housing offer in general
- 4.36 The Council would aim for 50% provision (with an expectation of at least 30% by habitable room), with a 60/40 split in favour of Affordable Rented homes as set out by Policy SP2 of CLP 2018.

Transport, Highways and Servicing of Development

- 4.37 The site's Public Transport Accessibility Level (PTAL) is moderate (3), but the site does lie within a controlled Parking Zone, and so the applicant can propose a largely car free development, subject to them agreeing to enter a S106 to ensure that residents could not obtain permits to park within any Controlled Parking Zones (CPZs).
- 4.38 Three accessible parking spaces are shown, situated behind the Mayday Road block and in between the first linear block. The existing London Plan (Policy 6.13) indicates that for proposals with densities of 70-170 units/hectare on sites in urban areas with PTALs of 2-4, the maximum parking provision should be 1 space per unit (so 64 spaces). In the 'Intend to publish London Plan,' the maximum parking provision is lower (0.75 spaces per unit), so a maximum of 48 spaces. Policy T6 of the draft Plan also states that Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite'). Car-free development has no general parking but should still provide disabled persons parking.
- 4.39 The Council's principle transport planner has indicated support for the reduction in width of the (currently very wide) vehicular access and has not raised any issues with the proposed (revised) access arrangements. They have expressed a parking ratio of 0.1 – 0.15 spaces per unit, which would equate to a parking provision of between 6-10 spaces. The level of car parking proposed is well below this, but could be justified and mitigated through the aforementioned S106 vehicular permit restrictions as well as appropriate Sustainable Transport solutions. Financial contributions towards sustainable transport initiatives (usually £1500 per unit) and possible requirements for on site or off site car club bays will also be explored as the design develops and if/when an application comes in.
- 4.40 The applicant has indicated that they would seek to meet London Plan standards in terms of Accessible Parking spaces and EVCPs, and the council also encourages the provision of a car club bay together with membership paid for

the future occupiers as part of a Legal Agreement. New London plan standards would require 4 x accessible parking spaces. The applicant would need to meet and is encouraged to exceed London Plan standards in relation to cycle parking, which should be secure and covered. Indicative location are shown for cycle (and waste) storage within the buildings, which is encourages as these would be secure and covered. Members' opinions on the level of parking provision for this development, and the balance between this provision and design considerations seeking to provide a more pleasant landscaped 'entrance' to the development are sought.

Other considerations

4.41 The finer details regarding elements such as waste, landscaping, emergency vehicle access have yet to be finalised, though the applicant has indicated that the access arrangements and vehicular parking area would allow waste and emergency vehicles to enter and manoeuvre within the site and exit in forward gear. This will need to be demonstrated through a detailed delivery and servicing plan

4.42 At this stage it is envisaged that some planning obligations will be required to mitigate the impacts of the development. Discussions are forthcoming in relation to the Heads of Terms, but it is anticipated that these would include (but may not be limited too) the following:

- Employment and training strategy and contribution (construction phase)
- Air Quality
- Car parking permit restrictions
- Affordable Housing
- Affordable housing review mechanisms (early and late stage review)
- Public realm delivery and maintenance
- Sustainable transport contributions (to include car club and membership)
- Highway works

5 SPECIFIC FEEDBACK REQUESTED

7.1 In view of the above, it is suggested that members focus on the following issues:

1. The acceptability of the residential redevelopment of the site.
2. The amount and distribution of scale/bulk/height across the site.
3. Design approach to the development and elevational details including materiality
4. Visual relationships between the development and surrounding developments (including local heritage impacts).
5. The balance between parking provision and design considerations which is seeking to provide a more pleasant landscaped 'entrance' to the development.
6. Potential impacts on neighbouring residential amenities in terms of light/outlook and privacy.

7. The mix and standard of the accommodation provided and how to best meet the needs of the residents in terms of layout, services provided and the amount and quality of communal space – both internal and external.
8. Affordable housing provision