

PART 6: Planning Applications for Decision**Item 6.3****1.0 SUMMARY OF APPLICATION DETAILS**

Ref: 20/03841/FUL
 Location: 103 to 111A High Street, Croydon, CR0 1QG
 Ward: Fairfield
 Description: Demolition of existing buildings and erection of 29 storey building to provide 121 residential units and flexible commercial floorspace at ground, mezzanine, first and second floors (comprising flexible A1/A2/B1 at ground/mezzanine floors; flexible A1/A2 at ground floor; flexible B1/D1/D2 at first and second floors) together with associated wheelchair accessible vehicle parking, cycle parking, landscaping, play areas and associated works.
 Drawing Nos: S_100 Rev 00, EX_120 Rev 00, 121 Rev 00, 122 Rev 00, 123 Rev 00, 124 Rev 00, 130 Rev 01, 131 Rev 01, 140 Rev 01, 141 Rev 01, 142 Rev 01, 143 Rev 01.
 GA_200 Rev 01, 201 Rev 01, 202 Rev 01, 203 Rev 01, 204 Rev 01, 205 Rev 01, 211 Rev 01, 218 Rev 01, 230 Rev 01, 231 Rev 01, 300 Rev 01, 301 Rev 01, 400 Rev 01, 401 Rev 01, 402 Rev 01 and 403 Rev 01.
 Applicant: Leos North London Ltd
 Agent: Mr Scott Hudson, Savills UK Ltd.
 Case Officer: Barry Valentine

Unit type	Market Housing		Low-cost rent		Intermediate (shared ownership)		Total		unit mix
	Unit	Hab room	Unit	Hab room	Unit	Hab room	Unit	Hab room	
One bed	57	114	3	6	3	6	63		52%
Two bed	19	57	5	17	3	9	27		22%
Three bed	19	76	3	15	3	15	25		21%
Four bed			4	24	2	12			5%
Total	95	247	15	62	11	42	121	351	
			26 units (21% by unit) 104 hab rooms 30% by hab room)						

*For the avoidance of doubt in terms of this table low-cost rent is affordable rent.

Commercial Use Class	Floorspace sq.m
A1/A2	211
A1/A2/B1	49
B1/D1/D2	920

Number of car parking spaces	Number of cycle parking spaces
4 on site car parking spaces	237

- 1.1 This application is being reported to Planning Committee because objections above the threshold in the Committee Consideration Criteria have been received.

2.0 BACKGROUND

Pre-Application Advice

- 2.1 An earlier version of the proposal was presented to Planning Committee at pre-application stage on the 23rd April 2020. The following is a summary of advice that committee provided:

Tall Buildings

- There was general support that the site could support a tall building due to the surrounding context.
- There were comments around the current pandemic and how people live in tall buildings, including congregating in communal and private amenity spaces; and it would be welcomed if the development could look into the health and wellbeing factors of high density living.

Heritage Assets

- There were mixed views on the impact of the development on heritage assets, although there was a broad recognition that Croydon Town Centre was changing. It was acknowledged that the benefits of the scheme would need to be suitably identified to ensure that they outweigh the less than substantial harm identified to the various heritage assets.

Affordable Housing

- It should be ensured that affordable housing is suitably maximised, especially within a single core design, with the expectation that a policy complaint scheme can be achieved, which would represent a benefit of the scheme.

Living Conditions

- There was debate around the quality of the accommodation and amenity spaces, whether it would be private or communal; who has access to the spaces including access for those with disabilities (including wheelchair users).
- There was comment around the public realm and the extent to which the scheme engaged with the ground floor (highway/footway) to create a welcoming, engaging and safe/high quality street environment. Members were keen to see trees introduced into the public realm.
- Members discussed the impact that the development would have on neighbouring properties, and immediate neighbouring relationships (both current and future) which would have an impact to the building. Members asked officers to fully review the daylight and sunlight impact of the development on neighbouring properties.

Design

- There was a general consensus that the design of the building had come a long way, though Members debated whether the podium should be distinctive to the other buildings to reflect the street scene. There was also comments that focused on the built form (above podium level) and the choice of brick colours.

Place Review Panel

2.2 The proposal was presented to Place Review Panel on two occasion, initially on the 21st March 2019 and on the 21st May 2020. The panel's observations from the most recent review are summarised as follows:

- The Panel agreed that the scheme was heading in the right direction and that there have been significant improvements since the previous PRP. However, they felt there was still some way to go in developing an overall successful proposal.
- The Panel recommend the height of the scheme be reduced so that it aligned with the datum set by Leon House as a point of reference. It was felt that this would lessen the impact of the massing in long range views, including views of the Minster. They did not agree with the applicant's assertion that the scheme would cause no heritage harm.
- It was felt that the scheme was dominant in long range views and is likely to have a negative impact on views of the Minster, although it was acknowledged that it was possible that this harm could be outweighed by public benefit.
- The Panel were supportive of the architectural expression of the podium element. Further work was felt to be needed on the architectural expression of the tower. It was felt that it did not relate well to the podium at present.
- The Panel are glad to see a tenure blind scheme, with shared entrances, services and access to communal amenity facilities.
- The Panel recommended that the Applicant engage with specialist consultants (i.e. environmental consultants, management teams, Landscape Architects and Housing Associations) as soon as possible to get their input on the design.
- A number of internal layouts were problematic and should be revised, with bedrooms for example having direct access to balconies rather than living areas. The balcony strategy also required further consideration.
- The Panel firmly believed that the details of the scheme should be submitted as part of the planning application, in order to ensure a high quality design. Similarly, the Applicant should work on the deliverability of the scheme, to ensure this level of quality and detail can be achieved.

2.3 The scheme has been further developed since the Committee and PRP sessions in order to improve the scheme and provide the necessary detail requested.

3.0 SUMMARY OF KEY REASONS FOR RECOMMENDATION

3.1 The provision of 121 residential units, at an appropriate unit mix, would make a significant contribution to housing delivery, and is being provided in a highly

sustainable and well connected location, within the Croydon Metropolitan Centre and Croydon Opportunity Area. The proposed homes would provide an appropriate high standard of residential accommodation, receiving good level of light, experience good outlook and access to private and high quality communal amenity space. The development would also provide appropriate commercial uses relative to its location (i.e. Secondary Retail Frontage within the Croydon Metropolitan Centre).

- 3.2 The development would provide 30% affordable housing by habitable room, which amounts to 26 units. The tenure splits would be 60% affordable rent (15 units) to 40 % shared ownership (11 units) by habitable room. This complies with Croydon Local Plan (2018).
- 3.3 The development would have a high quality modern contextual design which would respond both to the high street character, whilst also drawing upon and providing a contemporary reinterpretation of Croydon's mid-century heritage. The proposed development, principally through its height, would result in "less than substantial harm" to heritage assets. However, having given great weight to the conservation of the heritage assets, the harm is considered to be accompanied by clear and convincing justification, and outweighed by the public benefits provided in the form of new housing, affordable housing and improved public realm.
- 3.4 The proposed development would have a significant impact on light and outlook on a number of windows/rooms, particularly in Impact House. Having given regard to the form of the building and overreliance of light over neighbouring land, the context of the proposed developments' location and need to optimise housing delivery in sustainable locations, and public benefits the development provides (even after accounting for justification given in regards to heritage harm), on balance, the proposed development's impact on neighbouring living conditions has been appropriately justified. The proposed development would ensure appropriate wind conditions, both in and surrounding the site.
- 3.5 The proposed development is appropriate in regards to transport, neither adversely impacting highway safety nor operation, whilst also appropriate promoting sustainable modes of transport. The proposed development would be environmentally sustainable, enhancing biodiversity through urban greening, achieving as close to possible greenfield water run-off rates and would meet zero carbon targets via offsetting contribution.

4.0 RECOMMENDATION

- 4.1 That the Planning 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:
 - 1) 30% Affordable Housing provision (60% Affordable Rent: 40% shared ownership), with early and late stage reviews.

- 2) Air quality contribution of £13,100.
- 3) Local employment procurement and training strategy (construction phase) including a financial contribution of £88,750
- 4) Local employment and training strategy (operational) including a financial contribution; £7,100
- 5) Zero Carbon off-set contribution at current rates (approx. £140,000, dependant on efficiency achieved)
- 6) Future connection to planned district energy scheme
- 7) Croydon's sustainable transport contribution (£121,000), Transport for London sustainable transport contribution of £98,000 and public realm improvements on High Street
- 8) Street Trees Planting and Maintenance
- 9) Public Art
- 10) Car parking permit free restriction for future residents
- 11) Travel Plan and monitoring;
- 12) Car club including membership for new residents;
- 13) Highway works including Public Realm
- 14) TV signal mitigation
- 15) Retention of scheme architects (or suitably qualified alternative architect);
- 16) Monitoring fees and payment of Legal fees
- 17) Any other planning obligation(s) considered necessary by the Director of Planning and Strategic Transport

- 4.2 That the Director of Planning and Strategic Transport has delegated authority to negotiate the legal agreement indicated above.
- 4.3 That the Director of Planning and Strategic Transport has delegated authority to issue the planning permission and impose conditions and informatives to secure the following matters:

Conditions

- 1) Commencement within three years (compliance)
- 2) Approved Plans (compliance)
- 3) Construction and Environmental Management Plan (prior to commencement)
- 4) Archaeology (prior to commencement)
- 5) Contamination (prior to commencement, and then appropriate stages of development)
- 6) Piling method statement (prior to specific works)
- 7) Materials and Detailing (prior to superstructure)
- 8) Sample panels on site (prior to superstructure)
- 9) Balcony design (prior to superstructure)
- 10) Shopfront design and signage strategy (prior to superstructure)
- 11) Glazing specification including acoustic performance and design (prior to superstructure)
- 12) Internal Insulation (prior to superstructure)
- 13) Secured by design (Pre commencement and occupation)
- 14) Boilers, Flues and Ventilation (prior to occupation)
- 15) Hard Landscaping (prior to occupation)

- 16) Soft Landscaping including on site tree planting (prior to occupation)
- 17) Façade maintenance and cleaning strategy (prior to occupation)
- 18) Balcony and Terrace Management Plan (prior to occupation)
- 19) Internal and External Playspace (prior to occupation)
- 20) Delivery, Servicing and commercial noise management plan (prior to occupation)
- 21) Car Park management plan (prior to occupation)
- 22) Waste Management Plan (Prior to Occupation)
- 23) Cycle storage and end of trip facilities (compliance)
- 24) Circular Economy (Compliance and Post Completion)
- 25) Refuse storage (compliance)
- 26) Wind Mitigation (compliance)
- 27) Podium Privacy Screens and associated obscured glazing (compliance)
- 28) SUDS and Flood Risk (compliance)
- 29) Water use (compliance)
- 30) Ventilation Strategy (compliance)
- 31) Use Classes (compliance)
- 32) Commercial Opening Hours (compliance)
- 33) Acoustic assessment (compliance)
- 34) Air Quality (compliance)
- 35) Noise limits (plant) (compliance)
- 36) Accessible design (commercial) (compliance)
- 37) Accessible Homes (M4(2) and (3)) (compliance)
- 38) Residential Access Arrangements to Podium Facilities (internal and external) (prior to occupation)
- 39) Lifts (compliance)
- 40) Energy Strategy and carbon reduction including overheating (Compliance)
- 41) Electric vehicle charging (compliance)
- 42) BREEAM (compliance)
- 43) External Lighting (compliance)
- 44) Use class restrictions on commercial uses (compliance)
- 45) Any other planning condition(s) considered necessary by the Director of Planning and Strategic Transport, and

Informatics

- 1) Community Infrastructure Levy
- 2) Subject to legal agreement
- 3) Construction Logistics Plans
- 4) Flood Risk
- 5) Thames Water
- 6) Site notice removal
- 7) Waste notice before collections.
- 8) Cranes
- 9) Any other informative(s) considered necessary by the Director of Planning and Strategic Transport.

4.4 That the Planning Committee confirms that it has had special regard to the desirability of preserving the settings of (including views 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 Planning Committee confirms that it has paid special attention to the desirability of preserving or enhancing the character and appearance of the settings (including views of) of the Central Croydon Conservation Area, the Croydon Minster Conservation Area and the Chatsworth Road Conservation Area as required by Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 4.6 That the Planning 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.
- 4.7 That, if by within 3 months of the planning committee meeting date, the legal agreement has not been completed, the Director of Planning and Strategic Transport has delegated authority to refuse planning permission.

5.0 PROPOSAL AND LOCATION DETAILS

Proposal

- 5.1 Planning permission is sought for the demolition of existing buildings and erection of 29 storey building to provide 121 residential units and flexible commercial floorspace at ground, mezzanine, first and second floors (comprising flexible A1/A2/B1 at ground/mezzanine floors; flexible A1/A2 at ground floor; flexible B1/D1/D2 at first and second floors) together with associated wheelchair accessible vehicle parking, cycle parking, landscaping, play areas and associated works.



Fig 1 – CGI of development facing South East.

Site and Surroundings

- 5.2 Nos. 103 to 111 High Street is located on the eastern side of the High Street, at its junction with Edridge Road, immediately adjacent to the Croydon Flyover on its southern side. The site measures 0.08 hectares and currently hosts a three storey 'L' shaped Neo-Georgian 1930s building. The site slopes, with a level change of approximately 1.5m, rising to the East.



Fig 2 – Site Location Plan with Existing Photos

- 5.3 The building is in mixed use with a combination of commercial and residential units. Please note that within this report planning uses will be described and should be determined on the basis of categorisation set out under the old Use Class Order 1987, as the application was submitted and validated prior to 1st September 2020. The uses with the building are understood to be as follows:

Ground Floor

103 to 105 High Street - A3 (restaurant) – 350 sq.m (including 80 sq.m basement level)

107 High Street - A1 (Hair Salon) E – 99 sq.m

109 High Street - A1 (Retail) – 76 sq.m

111 High Street - A5 (Takeaway) – 72 sq.m

111A High Street - A1 (Retail) – 57sq.m

First Floor

103 High Street - D1 (Eye Clinic)

107 High Street - 2 X C3 (residential flats)

Second Floor

103 High Street - D1 (Laser Surgery)
107 High Street - 2 X C3 (residential flats)

- 5.4 The site is located within the Croydon Opportunity Area, in a secondary retail frontage within the Croydon Metropolitan Centre.
- 5.5 The application site is not located within a designated conservation area, nor is the building statutorily listed. The Central Croydon Conservation Area lies approximately 120m to the north of the site, the Chatsworth Road Conservation Area approximately 230m to the east and there is a Local Heritage Area beyond the High Street 110m to the west. The site is in a Tier II Archaeological Priority Area.
- 5.6 The site has a Public Transport Accessibility Level of 6b (best). The site is located in Flood Risk Zone 1 as defined by the Environmental Agency, where the annual probability of fluvial and tidal flooding is classified as less than 1 in 1000 years. In terms of surface water, the site has a very low classification, which corresponds to annual probability of flooding less than 1 in 1000 years. The street to the front of the site is at low risk of surface flooding, which corresponds to annual probability of flooding less than 1 in 100 years. The whole of borough is in an Air Quality Management Area (AQMA).
- 5.7 The surrounding area has a varied character. Where the application site sits, and to the north along High Street, is the southern end of the Town Centre and has a distinctive high street character. To the south and east of the site sits a series of taller buildings, many of which were office, but have been converted to residential under permitted development (notable examples include Leon House and Impact House). The flyover runs east to west, adjacent to the northern elevation of the site.

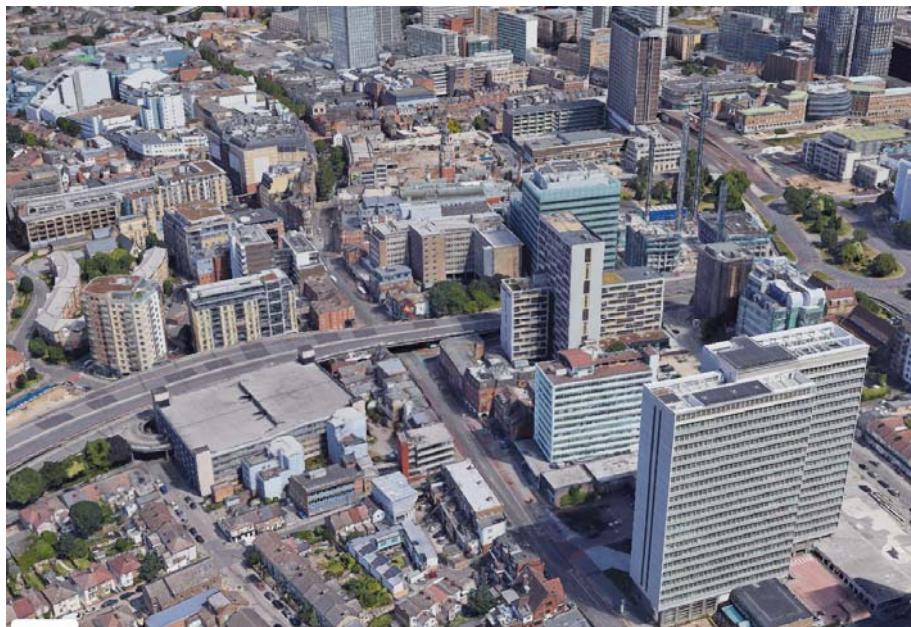


Fig 3 – Google Earth Image of the site facing north

Relevant Planning History

- 5.8 The council provided pre-application advice reference (18/01346/PRE) in connection with this site.
- 5.9 Planning permission reference 17/00325/FUL was granted on the 25/04/2017 for the 'Construction of third floor and part conversion of first second and third floors to provide 2 one bedroom flats, 5 two bedroom flats and 1 three bedroom flats.'
- 5.10 A certificate of lawful existing development reference 20/02540/LE was granted on the 11/09/20 for 'Confirmation that works carried out on site would constitute a material operation, such that the development approved under planning permission reference 17/00325/FUL has been lawfully implemented.'

Relevant Planning History for Adjacent Site

Impact House, 2 Edridge Road

- 5.11 Prior Approval Application reference 15/02723/GPDO was granted on the 10/08/2015 for the change of use of the site from B1a (office) to C3 (residential). This scheme was implemented.
- 5.12 Planning Permission reference 16/04750/FUL was granted on the 05/04/2017 for the 'Use of the former office floor area of the top three floors as 38 flats. Construction of Infill extensions of part of 8th and 16th floors and provision of new communal roof terrace at 9th floor. Provision of bin and cycle storage at lower ground floor together with external alterations and provision of disabled parking bays.' This has been implemented. Non material amendment (references 18/02533/NMA and 19/01799/NMA) have also been approved.

Leon House

- 5.13 Planning permission reference 18/06140/FUL was granted on the 26/02/2021 for 'Demolition of existing retail and office units. Redevelopment of the site to provide a mixed use development within three buildings up to 31 storeys, providing up to 357 residential units (Use Class C3) and flexible units for retail, professional service and food and drink uses (Use Class A1-A5). Creation of a new public square, landscaped communal gardens, and associated highway works; basement car parking; cycle parking; waste storage; and associated works.'
- 5.14 Planning permission reference 19/04605/FUL was granted on the 26/05/2020 for the 'Erection of four residential units within the roof level of Leon House, associated parking, cycle and refuse storage.'

4 to 20 Edridge Road

- 5.15 There is a current planning application reference 18/06069/FUL for the 'The erection of a part 33 storey, part 11 storey and part single storey building providing 230 residential units (Use Class C3); ancillary residents' gym; communal roof terraces and amenity spaces; new vehicular access; car parking; cycle parking; waste storage, and associated works.' The application received a resolution to grant at planning application committee in the 21/05/20, Subject to S106 agreement. The S106 is still being negotiated.

6.0 LOCAL REPRESENTATION

- 6.1 A total of 294 neighbouring properties were notified by the way of letter about the application and invited to comment, site notices were erected and a notice published in the press. The number of representations received from neighbours, local groups etc. in response to notification and publicity of the application were as follows:

Individual responses: 33, Objections: 32, Support: 1

- 6.2 The following issues were raised in representations that are material to the determination of the application, which are addressed in substance in the next section of this report:

Summary of Objectors Concerns	Officer's Response
No need for additional houses. Site is not allocated, which is indicative that the site is not suitable for residential development.	The London Plan (2021) identifies that there is a need for 66,000 additional homes per year and a need for 43,500 affordable homes per year. As part of meeting this need, Croydon has a ten year housing target of 20,790 homes. This site with its high connectivity and close proximity to town centre is an optimum location to deliver housing. The site allocations only form one part of the housing delivery, and does not preclude development of windfall sites, which are also needed to meet these targets and address London's need for housing.
Does not provide sufficient affordable housing.	The application meets minimum Croydon Local Plan policy requirements and it has been demonstrated through the submission of a viability report that has been independently reviewed, that this is the maximum reasonable affordable housing that can be delivered.
Does not provide sufficient number of 3 bed units.	The development provides sufficient number of 3 bed units, and exceeds policy requirements.
Impact on the character and appearance of the high street, out of scale. Impact on visual amenity.	The proposed development has a high quality design that complements and responds to the high street character, would be viewed in the context of existing and emerging tall building, and therefore not out of keeping.
Long terms loss of high street character from	The site is not in a conservation area, as such existing properties could be demolished without planning permission via the prior approval

demolition. Overdevelopment.	process. The development respectfully retains the high street character through its design and form. The proposal complies with council policy and as such not overdevelopment.
Impact on surrounding businesses, including night clubs, as it will generate more complaints.	The development would be appropriately acoustically attenuated, such that it would not be significantly impacted from any noise generated by surrounding businesses and late night operations.
Development will cause noise disturbance.	Any commercial activities, subject to restrictions secured by condition, would generate a comparable level of noise disturbance to existing uses on site. The main exit is onto the busy high street. Any coming and goings would not generate significant level of noise disturbance given this context.
Replacing 5 retail units with 2 would be detrimental to the high street, and the cost of units would be out of local businesses affordability. Reduces access to convenience stores, restaurants and hairdressers.	The proposed development is in line with policy in regards to net loss of ground floor retail space. Whilst the proposed commercial rents, would likely have a higher rate due to being of a higher quality, there is still a wide range of available commercial units with Croydon at competitive prices. There are significant number of alternative convenience stores, restaurants and hairdressers within short proximity of the site.
Impact on sunlight, daylight and outlook of surrounding neighbouring properties.	On balance, as set out in the report, giving weight to site's location, the built form, history of neighbouring properties and their respective layouts as well as public benefits delivered by the proposed development, whilst the proposed development would have a significant impact on neighbouring light and outlook, especially to those windows on the western side of Impact House closest to the development, this impact is in line with guidance and justified.
That the sunlight and daylight assessment is inaccurate.	Daylight and sunlight assessment model is based on information that is publicly available, such as planning records, and based on reasoned assumptions. The model has been updated since original public consultation has been carried out to improve accuracy. It gives an

	adequate assessment for the purposes of planning as to likely impact of the proposed development on sunlight and daylight.
Loss of privacy to surrounding neighbouring properties	In general there would be very good separation distances of over 18m, ensuring good outlook and privacy. The only exception would be windows on western flank of Impact House closest to the development. In these instances windows and room layout have been strategically located and designed to minimise direct overlooking.
Impact on light of surrounding businesses	The proposed development would have a positive impact on surrounding business, with increased number of residents accessing shops and local services.
Impact of the development on light that communal amenity space would receive on top of Impact House.	The proposed terrace would still receive adequate sunlight from the south facing gap between Impact House and the development.
Development will cause crime	There is no evidence to support this assertion that new residents would cause crime. A condition is recommended in regards to secure by design, to ensure that the development takes reasonable steps so as to prevent crime. Increased surveillance, activity and overlooking may help reduce crime in the area.
Neighbours were not consulted on the application by the applicant before it was submitted.	Whilst not a matter than planning permission can be refused on, a statement of community involvement was submitted by the applicant. It sets out that they sent newsletter invitations to 993 households, inviting them to a virtual consultation and live chat session.
Impact on Mental Health	For the reasons set out in the report the proposed application is considered acceptable, and where reasonable conditions have been used to mitigate the impact of the development to ensure the health and wellbeing of neighbouring properties.

6.3 The following comments were made in objections received, which are non - material to the determination of the application:

- Loss of View
- Impact on property prices.

6.4 The following procedural points were raised in representations received:

- Neighbouring letters were received late due to postal delays
(Officer Response: – This was beyond the control of the Local Planning Authority. It should be noted that neighbours were re-consulted in December, and all objections received to date have been included and considered in this report. It is considered that neighbouring properties have had sufficient time to consider the application and submit any comments, and for them to have been taken into account in both the manner the decision is taken (i.e. via planning application committee) and in regards to recommendation and eventual decision taken.)

6.5 One letter of support has been received stating the following:

- Bringing much needed new build residential and commercial accommodation.
- New shops and residents will add vibrancy to the area.
- Location is suitable.

6.6 The following Councillors made representations:

Councillor Chris Clarke (Objection)

- Daylight and sunlight impacts on neighbouring properties.
(Officer's response – This has been addressed in both the neighbour's comments section above and in the main body of the report)
- Wind/micro-climate impacts.
(Officer's response – The scheme in its revised form would ensure appropriate wind conditions in and around the site.)

7.0 CONSULTATION RESPONSE

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

Mayor of London (GLA) (Statutory Consultee)

The application was referred to GLA under Stage 1 (due to proposal being more than 30m high and including more than 150 flats) and in summary made the following comments:

- The proposed residential-led mixed use development on this underutilised brownfield site, within an Opportunity Area, is strongly supported in strategic planning terms.
- The proposed density and optimisation of the site is supported. Design considered to be a distinctive slender volume in longer range views that at

mid to local views development responds positively in scale to existing and emerging development and positive contributes to the townscape. Quality of residential accommodation was considered to be generally high.

- That less than substantial harm would be caused to heritage assets; further information is required to establish the extent of the public benefits of the proposals before these can be weighed against the harm identified. Further detail is required with regard to wind mitigation, children's playspace and fire safety.
- The proposed offer of twenty six affordable units was accepted as being the maximum reasonable, although it was considered that the deficit was overstated. The applicant should seek to improve the affordability of the residential units by providing them as London Affordable Rent (LAR).
- Further information is sought in relation to minimising overheating risk, demonstrating potential for connection to the planned heating network in Croydon.

Transport of London (TFL) (Statutory Consultee)

In summary there comments were as follows:

- Overall the proposed development contributes positively to the Healthy Streets approach, however this could be undermined by the increased servicing activity. Further investigation in required to allow more deliveries to take place on site.
- The non-provision of standard car parking is supported. The amount of blue badge parking is compliant with Draft London Plan, and to ensure full compliance a Parking Management Plan, should be secured by condition which demonstrates how additional Blue Badge Parking could be provided subject to demand. No Blue Badge car parking for the proposed office space is proposed and it should be identified where this can be provided. Electric Vehicle Charging Points should be secured via condition.
- The overall amount of cycle parking is compliant with the Draft London Plan policy, although spaces for larger or adapted cycles are needed. Visitor short stay cycle parking should also be provided in public realm.
- The trip rate and mode split are accepted. A contribution of £98,000 is expected to upgrade the existing public transport network.
- A detailed Delivery and Servicing Plan (DSP) and Construction Logistic Plan should be secured via condition.

Historic England (Statutory Consultee)

No comment on the application.

Lead Local Flood Authority (LLFA) (Statutory Consultee)

No objection.

Greater London Archaeology Advisory Service (GLAAS) (Statutory Consultee)

It was considered that there is a high potential for archaeology to occur within the application site but that this will have been significantly impact by existing and previous developments. No objection is raised subject to condition.

Gatwick Airport (Statutory Consultee)

No objection

Heathrow Airport (Statutory Consultee)

No objection. Informative recommended in regards to cranes.

Thames Water (Statutory Consultee)

No objection subject to condition. General comments have also been included as an informative.

Designing Out Crime Officer

No objection but recommends that a condition be attached in regards to secure by design accreditation.

8.0 RELEVANT PLANNING POLICIES AND GUIDANCE

- 8.1 In determining any planning application, the council is required to have regard to the provisions of its Development Plan and any other material considerations. Details of the relevant policies and guidance notes are attached in Appendix 1.

National Guidance

- 8.2 The National Planning Policy Framework 2019 (NPPF) and online Planning Practice Guidance (PPG), as well as the National Design Guide (2019) are material considerations which set out the Government's priorities for planning and a presumption in favour of sustainable development.

- 8.3 The following NPPF key issues are in particular relevant to this case:

- Delivering a sufficient supply of homes
- Ensuring the vitality of town centres
- Promoting healthy and safe communities
- Promoting sustainable transport
- Making effective use of land
- Achieving well-designed places
- Meeting the challenge of climate change, flooding and coastal change

Development Plan

- 8.4 The Development Plan comprises the London Plan 2021, the Croydon Local Plan 2018 and the South London Waste Plan 2012.

- 8.5 The relevant Development Plan policies are in Appendix 1.

Supplementary Planning Document

- 8.6 The relevant SPGs and/or SPDs are listed in Appendix 1.

9.0 MATERIAL PLANNING CONSIDERATIONS

- 9.1 The main planning issues raised by the application that the Planning Committee are required to consider are:

1. Principle of development, affordable housing, housing mix and quality of residential accommodation.

2. Impact on the appearance of the site and surrounding area.
3. Impact on neighbouring properties' living conditions.
4. Impact on surrounding environment
5. Sustainable Design
6. Transport, parking and the highways.
7. Other planning issues.

Principle of development, affordable housing, housing mix and quality of residential accommodation.

Principle of Development

- 9.2 The London Plan (2021) sets a minimum ten year target for the borough of 20,790 new homes over the period of 2019-2029. The Croydon Local Plan (2018) sets a minimum twenty year target of 32,890 new homes over the period of 2016 to 2036.
- 9.3 The site is within the Croydon Opportunity Area. The Opportunity Area Planning Framework (2013) encourages new homes, the revival of the high street, and improved streets and amenity spaces. The site is located within the Croydon Metropolitan Centre, where Local Plan Policy SP3.10 sets out a flexible approach to office, housing and retail uses.
- 9.4 The proposed development would create additional residential units that would make a contribution to the borough achieving its housing targets as set out in the London Plan (2021) and Croydon Local Plan (2018). The site has excellent access to public transport, local shops and services and is therefore well placed for high density residential-led development, and therefore the intensification of the residential element is in principle supported
- 9.5 The site is in a Secondary Retail Frontage within the Croydon Metropolitan Centre. The relevant permitted uses for the site are set out in policy DM4, and specifically within Table 5.3 of the Croydon Local Plan (2018). The relevant table is shown below:

Secondary Retail Frontage	A1 – A4 and Community Uses	Acceptable in principle with a ground floor limit on Community Uses in these locations of 250m ² (gross)
	A5	Acceptable in principle as long as it does not result in two or more adjoining A5 units at ground floor
	B1	Acceptable in principle as long as it results in an active frontage and does not undermine the retail function of the frontage
	All Other Uses	Unless it relates to a Community Use proposals involving an increase of existing non A Class ground floor space within Secondary Retail Frontage will be refused

Fig 4 - Extract from Table 5.3 of the Croydon Local Plan (2018)

- 9.6 At present there is 574 sq.m of floorspace that falls within an A use class at ground floor level. This would be reduced to a minimum of 80 sq.m, but up to 116sq.m dependant on the end use of flexible use unit no.2. There are no policies with Croydon Local Plan (2018) that prevents the loss of A use class floorspace in this location.
- 9.7 The (re-)provision of retail (A1) and professional and financial service (A2) at ground floor level is in line with policy DM4. The potential for the smaller commercial unit of the two being a business use (B1) is acceptable. Activate

frontage would be achieved through the larger unit remaining in A class use, and given that main entrance to the residential units, and associated comings/going to the residential units, would be from the High Street. The retail function is not undermined due to the larger of the two units remaining as A1/A2. It should be noted that the new use class order (Town and Country Planning (Use Classes) (Amendment) Regulations 2020), which came into effect after this application was submitted, combines A1, A2 and B1 (as well as A3) class uses into a single use class, Class E.

- 9.8 Up to four commercial units with a flexible B1/D1/D2 are proposed at first and second floor levels with a total of 920sq.m of floorspace. The Croydon Local Plan supports the provision of office as it is located within the Croydon Metropolitan Centre and on upper floors. The Croydon Local Plan (2018) requires mixed use developments to include a level of office floorspace proportionate to Croydon's role as an Outer London Office Centre. Paragraph 5.28 of the Croydon Local Plan (2018) states that 'Office floor space provision within a scheme will also be considered against the complexion and merits of the other uses proposed'. Officers consider that the proportion of office floorspace is reasonable, and that this use is a logical response to the site, given there is a practical rationale behind not locating residential units on lower floors, due to the proximity of the flyover.
- 9.9 The lawful planning use of parts of the first and second floor levels is as two D1 units that were last in use as an eye surgery and a laser hair removal; both are currently vacant. Planning permission reference 17/00325/FUL granted the change of use of the two D1 units to residential (C3). This was acceptable as the existing D1 uses had a high commerciality and were not considered to be true community facilities, which the policy was intended to protect. On this basis, and given that the relevant planning permission remains extant, as established through granted certificate of lawful existing development application reference 20/02540/LE, the potential loss of the two D1 units (as a flexible use is proposed) is acceptable. Inversely proposing a flexible use that includes D1/D2, is also acceptable in principle on upper floors, given the historic use, given it is on upper floors and given the context of changes to use class order that came into force on September 1st 2020, that saw the introduction of a new single E use class which covers former A class uses, B1 office, D1 (a-b) and some D2 uses.
- 9.10 In conclusion, in principle the provision of a residential mixed use development that contains an element of A class use floorspace at ground floor level, is in line with policy and acceptable.

Affordable Housing

- 9.11 The Croydon Local Plan (2018) requires the council to negotiate up to 50% affordable housing (subject to viability), with a minimum of 30% on a habitable room basis. The Croydon Local Plan (2018) requires this to be sought at a 60:40 split between affordable rented homes and intermediate homes. The London Plan (2021) sets a strategic target of 50%, but allows lower provision to be provided dependent on whether it meets/exceeds certain thresholds, or when it has been viability tested. When a scheme proceeds down the viability tested route, it requires schemes of a single phase, to have both early and late stage viability reviews. Policy H6 of the London Plan (2021) requires developments to provide 30% as low cost rented homes, either as London Affordable Rent or

Social rent, allocated according to need and for Londoners on low incomes, 30% as intermediate products which includes London Living Rent and London Shared Ownership, with the remaining 40% to be determined by the borough.

- 9.12 The proposed development would provide 30% affordable housing by habitable room, which amounts to 26 units. The tenure splits would be 60% at affordable rent (15 units) and 40 % (11 units) at shared ownership, calculated on a habitable room basis. This meets the Croydon Local Plan (2018) policy requirements, but as it is not being provided at London Affordable Rent Level, falls short of London Plan's (2021) split requirements.
- 9.13 The application was subject to a viability appraisal at both pre-application and application stages, which has been scrutinised independently by BNP Paribas, as well as by the GLA. They both agree there would be a viability deficit, and it would not be viable to provide an increased amount of affordable housing. It also follows that requiring the affordable rent element to be provided at London Affordable Rent levels would further increase the viability deficit. In these circumstances objection is not raised to the non-provision of the affordable rent element at London Affordable Rent levels.
- 9.14 The Mayor of London's Affordable Housing and Viability SPG states that where developments meet or exceed 35% affordable housing without public subsidy (subject to the tenure mix being to the satisfaction of both the LPA and GLA), such schemes can follow the 'fast track route', whereby they are not required to submit viability information and will only be subject to an early viability review. Public subsidy is available for developments providing at least 35% affordable housing, with the amount of subsidy significantly increased for development with more than 40% affordable housing. The development was tested to determine whether the public subsidy would improve viability, but due to the significant viability deficit, increased affordable housing (even with grant funding) was found to be unviable.
- 9.15 The proposed affordable housing is therefore accepted as no additional affordable housing could be viably and reasonably provided. Early and late stage review mechanisms are recommended to be secured through the S106 agreement to capture any changes (for example increase in house process) which may result in increased affordable housing provision and/or contribution
- 9.16 The scheme has been designed to be tenure blind as far as reasonable possible. All units would be accessed from the main entrance and lobby area, and have access to a single core. Irrespective of tenure, residents would have access to the winter garden, internal soft play area and external amenity area, which is recommended to be secured via condition.

Housing Mix and Quality of Residential Accommodation

- 9.17 Policy SP2.5 of the Croydon Local Plan (2018) states that the Council will seek to ensure that a choice of homes is available in the borough, which will address the borough's need for homes of different sizes. Policy DM1 of the Croydon Local Plan (2018) requires developments in a central setting with a PTAL of 4, 5, 6a or 6b to have 20% of the units as three bedroom or larger. 26% (31) of the units

would be three beds or greater, exceeding the policy standard. The provision of family homes is supported.

- 9.18 Policy DM1.2 seeks to prevent the loss of small family homes by restricting the net loss of three bed units and the loss of units that have a floor area less than 130 sq.m. There would be a significant net gain (+27) in the number of three bed units and acceptable in this regard. It is noted that the extant planning permission reference 17/00325/FUL resulted in the loss of three of the four three bed units.
- 9.19 All of the proposed residential units meet and many exceed minimum floorspace standards set out in the London Plan (2021). All unit would have private amenity space that meets or exceed Croydon Local Plan (2018) and London Plan (2021) standards.

Level	Unit no	Type	Standard	Size	Excess
1	1	2 b 4p	70	87.9	17.9
2	1	2b 4p	70	87.9	17.9
4 to 9	1	2b 3p	61	62	1
	2	3b 4p	74	88.5	14.5
	3	1b 2p	50	56.2	6.2
	4	4b 6p	99	109.3	10.3
10 to 16	1	2b 3p	61	62	1
	2	3b 5p	86	88.4	2.4
	3	1b 2p	50	56.2	6.2
	4	1b 2p	50	57.2	7.2
	5	1b 2p	50	50.3	0.3
17 to 26	1	2b 3p	61	62	1
	2	3b 5p	86	88.4	2.4
	3	1b 2p	50	56.2	6.2
	4	1b 2p	50	57.2	7.2
	5	1b 2p	50	50.3	0.3

Fig 5 - Unit type and sizes compared against floorspace standards

- 9.18 London Plan (2021) states that developments should maximise the provision of dual aspect units, with single aspect units only provided where it considered to be a more appropriate design solution in order to optimising capacity, and where it can be demonstrated they will have adequate passive ventilation, daylight, privacy and avoid overheating.
- 9.19 There are no single aspect north facing units, with the vast majority of the units being dual aspect. The exact number of single aspect units is debatable, as some units only have a limited secondary aspect (for example where it faces onto a balcony, or the side wall of Impact House). Nevertheless, Officers are satisfied that the applicant has sought to maximise the number of dual aspects homes through the design of the development. Where single aspect or limited dual aspect units are proposed there is a logical reason. For example, in regards to the two units within the south eastern corner of the podium, it is understood that these were provided as outcome of public consultation carried out by the

applicant, as neighbours expressed a preference for being overlooked by residential units rather than commercial units.

- 9.20 The applicant has submitted a sunlight and daylight report that has been carried out in accordance with BRE guidance. 78% of the habitable rooms meet Average Daylight Factor (ADF) standards and 93% of habitable rooms would meet No Skyline (NSL) visibility tests. Whilst these shortfalls are unfortunate, officers accept that this in part comes from a need to optimise the site's potential, the inherent limitations in the site itself (i.e. urban dense location and limited size) and to ensure rational and practical layouts (for example having living space accessing a balcony as recommended by Place Review Panel), which also helping to create a high quality logical and ordered external facade design.
- 9.21 In terms of sunlight, in unit types 1 and 2, which would be located on floors 4 to 26, the main living areas all do not face 90 degrees of due South, and as such would not receive direct sunlight. BRE guidance recommends minimising the number of dwellings whose living rooms face solely north. At the same time it acknowledges that the site's urban environment may impose orientation issues which may not be possible to be overcome. Officers are satisfied that the applicant has sought to limit the number of north facing living rooms, and where they are proposed, it is due to either site restraints and/or need to derive a practical layout. Of the remaining units, all but one of the living rooms would meet sunlight standards, both on an annual and during the winter. The exception is the first floor unit, located within the south eastern corner of the podium, which still receives a good annual standard of sunlight at 21 probable sunlight hours, with the target being 25.
- 9.22 Units have also been tested for overheating using CIBSE TN59 analysis, with compliance achieved for dwellings and corridor spaces for current summer weather, with the development designed to allow for future climate resilience.
- 9.23 A noise assessment was submitted, considering internal noise limits. Mechanical ventilation is required given the measured baseline noise levels. For the worst affected façade faces onto the A232, high acoustic specification glazing would be required, which is recommended to be finalised at latter design stage and secured via condition. The submitted acoustic statement demonstrates with suitable mitigation, the site is suitable for the implementation of the proposed development. There is considered to be no conflict with the Agent of Change Principle.
- 9.24 The proposed units would have good levels of privacy. Whilst there is only a 6m separation distance between the flank elevation of the development and windows on the western flank elevation of Impact House, there are no directly facing windows due to the strategic location of a windowless wall. On the other elevations, the nearest residential window is over 18m away, which is sufficient to ensure good level of privacy for the homes.
- 9.25 11% (13) of units would be Wheelchair User Dwellings and would meet Building Regulations M4(3) and 89% (108) of units would be accessible and adaptable,

and meet Building Regulations M4(2). This is in line with policy and is recommended to be secured by condition.

- 9.26 Level access is provided to shared amenity and playspaces, as well as to residential lobby and associated lifts. The site offers level access routes to wheelchair accessible public transport (including buses, trams and trains), therefore wheelchair users would not be wholly car dependent. Four accessible car parking spaces are proposed at mezzanine level, which would be allocated to future occupiers who are blue badge permit holders.

Private and Communal Amenity Space, and Playspace

- 9.27 All units have access to private amenity space in form of a balcony, which is appropriate sized in line with London Plan (2021) and Croydon Local Plan (2018) policy standards. All balconies would have suitable wind conditions for sitting during the summer.
- 9.28 External communal amenity space is provided at podium level, which has been designed to provide spaces for resting, socialising and exercising. This is supplemented by the provision of a winter garden and gym to provide a balanced offering. The majority of the podium is south facing, with 68% of the external amenity space receiving over 2 hours of sunlight on 21st March, exceeding BRE guidance which recommends a minimum of 50%. The podium level would have wind conditions suitable for sitting during the summer season.
- 9.29 There would be 440 sq.m of child play space provided, which meets Mayor of London's play provision requirement. This would be provided in the form of loop play path, sand pit, active play climbing feature, growing garden and play lawn. In addition 62.5sq.m of internal soft play space would be provided, which is recommended to be secured through condition. A condition is recommended to ensure that the scheme is tenure blind in terms of accessing these spaces.
- 9.30 Overall, the proposed development would provide well-designed homes, which would offer a good outlook, privacy, sunlight and daylight, internal spaces (many of which are generously sized) with rational layouts, private amenity spaces as well as access to high quality internal and external communal areas, which include appropriate child play areas.

Impact on the Appearance of the Site and Surrounding Area.

Principle of Tall Building

- 9.31 Croydon Local Plan (2018) Policies SP4 and DM15, and London Plan (2021) policy D9 are the relevant policies in regards to the consideration of tall buildings. The London Plan recognises that Opportunity Areas are 'London's principle opportunities for accommodating large scale development to provide substantial numbers of new employment and housing'. The site is located within the Croydon Opportunity Area and in an area of high PTAL, and therefore in principle would be one that tall building developments could be considered acceptable and potentially encouraged.

9.32 The Croydon Opportunity Area Framework identifies that the site is in an ‘Edge Area’. Edge areas are more sensitive. Tall buildings in Edge Areas may be acceptable where there is limited negative impact on sensitive locations, and that the form, height, design and treatment of a building are of high quality.

Heritage

9.33 The Planning (Listed Buildings and Conservation Areas) Act 1990 requires (at section 66) with respect to listed buildings, that special regard is paid to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possess. With regard to conservation areas (at section 72), it requires special attention to be paid to the desirability of preserving or enhancing their character or appearance. Decision makers must give considerable importance and weight to these statutory requirements. When an authority finds that a proposed development would cause any harm to a listed building or its setting or to the character or appearance of a conservation area, it must give that harm considerable importance and weight in reaching a decision.

9.34 The NPPF places strong emphasis on the desirability of sustaining and enhancing the significance of heritage assets, and affords great weight to the asset’s conservation. At paragraph 193 it states that:

“great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be)... irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm”

9.35 Any harm to a designated heritage asset, including from development within its setting requires “clear and convincing justification” (paragraph 194). Where the harm is ‘less than substantial’ it should be weighed against the public benefits delivered by the proposed development (paragraph 196).

9.36 Policy DM18 of the Local Plan permits development affecting heritage assets where the significance of the asset is preserved or enhanced. Policy SP4 requires developments to respect and enhance heritage assets, and Policy DM15 permits tall buildings which relate positively to nearby heritage assets.

9.37 The setting of a heritage asset is defined in the NPPF as ‘The surroundings in which a heritage asset is experienced’. This includes views of the asset and its positioning within the wider townscape.

9.38 The site is not in a conservation area and there are no heritage assets on the site. However, it is in a sensitive location close to a large number of important heritage assets (including some of Croydon’s oldest buildings) and the scale of the proposed building is such that it would be visible over a wide area. Consequently it would have an impact on the setting of various heritage assets and would detract somewhat from the character of Croydon’s historic centre. The main impacts are detailed below. The designated assets considered to be affected by officers would be Croydon Minster (Grade I listed building), Croydon

Minster Conservation Area, Wrencote (Grade II* listed building) and the Central Croydon Conservation area.

- 9.39 In all cases, the harm would be less than substantial, and generally minor. However, it is important to note that some of the affected assets have high or very high level of significance and play a key role in Croydon's townscape and historic character.
- 9.40 The Heritage, Townscape and Visual Impact Assessment submitted with the application adequately illustrates the likely visual impact. The assessment includes verified views which were agreed with Council officers at pre-application stage.
- 9.41 Historic England were consulted on the application. They have confirmed that they do not wish to offer any comments, and advise to seek the views of your specialist conservation advisers. In line with this, the conservation officer has reviewed the submitted documentation, and her assessment of the proposals heritage impacts aligns with that set out in this section.

Croydon Minster and Croydon Minster Conservation Area

- 9.42 The Minster is a Grade I listed building of very high historic interest and community value. It marks the historic core of the old town and is prominent in its locality, and in key long views. The Croydon Minster conservation area contains various other important buildings – notably the Old Palace School (also grade I).
- 9.43 The view of the Minster from Rectory Grove is particularly important as one of only two views where the full tower elevation can be seen. The street was laid out specifically to align with the Minster and is an important part of its setting. The view allows the full tower elevation and an uninterrupted silhouette to be appreciated. It is identified as a key view in the Croydon Minster Conservation Area Appraisal. As illustrated in view 1 in the HTVIA (reproduced below), the development would be directly behind the Minster tower in this view and would be visible at the side, disrupting the silhouette. However, the bulk of the proposed building would be behind the tower and it would not protrude above the tower or interfere with the view of the pinnacles. The proposed building would be visible in other incidental views around the conservation area (as illustrated in views 2 and 3A in the HTVIA) where it would be out of scale with the historic townscape. It would add to the cumulative impact caused by various existing and consented tall buildings in the area, but would not be particularly dominant or intrusive. Any impact on views of the Old Palace School would be negligible.
- 9.44 Overall the development would cause some harm to the significance of Croydon Minster and the Croydon Minster Conservation Area. The impact on the view of the church from Rectory Grove is the main concern. The harm would be less than substantial and minor.



Fig 6 – Verified render views left Image - showing proposed impact (development visible on left hand side of Minster) and right image – showing cumulative impact.

Wrencote House

9.45 Wrencote is a Grade II* listed building on the High Street and close to the site. It is one of few early 18th century buildings surviving in the town centre. Its historic context is largely lost but it retains its relationship to the high street and this is an important part of its setting. The existing building on the application site and other buildings on that stretch of the street are complementary to Wrencote in that they are of a similar scale and provide consistent frontage along the street. The proposed development would alter this. The detailed design of the proposed building is well considered and care has been taken to ensure the development addresses the High Street and continues the established street frontage. However the scale and height mean it would appear very dominant and overbearing in views of the group, and would have a harmful impact (illustrated in views 11 and 12 of the HTVIA – view 12 reproduced below.) Harm to the significance of Wrencote would be less than substantial, and relatively minor given that the existing townscape setting is very mixed and there are already a number of large modern buildings in the vicinity which are quite dominant.



Fig 7 – Existing and Proposed Verified Rendered View looking north.

Central Croydon Conservation Area

- 9.46 Central Croydon Conservation Area is the commercial and civic heart of Croydon. Its street layout is largely medieval in origin and it retains much of its plan form and historic fabric. The layout and scale of buildings, townscape character and street views are important aspects of the area's significance. Surrey Street is of particular importance as a historic market street with buildings from the 17th, 18th, 19th and 20th centuries.
- 9.47 The proposed development would be visible from some locations in the conservation area above and behind historic buildings, and would be incongruous due to its scale and form (illustrated in views 4a, 4b, 5 and 7 in the

HTVIA). These streets retain much of their historic character and the scale and form of buildings are very consistent. In most cases there aren't any existing tall buildings visible in the background. The proposed development would alter that and would detract from special character of these streets. There are other proposed/consented buildings (Leon House Quarter development) that would also be visible in some views if built, so there would be a cumulative harmful impact. (This is well-illustrated in the HTVIA).

- 9.48 The greatest impact would be to the view along Surrey Street, shown in view 7 of the HTVIA and reproduced below. The proposed development would terminate views along this important street and would be very prominent and conspicuous at the centre of the view. If other consented developments are built there would be a cumulative impact, but this proposal would be the most harmful as it is closer and in the middle of the view.



Fig 8 – Verified Rendered View Looking Along Surrey Street with Cumulative Development Shown.

- 9.49 The harm to the significance of the conservation area as a whole would be less than substantial and relatively minor, but with a more noticeable visual impact in some locations (e.g. Surrey Street).

- 9.50 There are a large number of listed and locally listed buildings in the conservation area, but no specific adverse impacts to any of these have been identified. View 6 in the HTVIA shows that the development would be minimally visible in views of the Town Hall and clock tower (listed grade II). This is not considered to be harmful. The proposed building would be prominently visible in view 5, which is taken from outside the Whitgift Almshouses (grade I listed), but this is not a principle view of the Almshouses, and the new development would some distance away from them.



Fig 9 – Verified Wireline View Showing Proposed Development from in front of Town Hall.

Chatsworth Road Conservation Area

- 9.51 The proposed development would be visible from parts of Chatsworth Road Conservation Area – a residential area of late Victorian houses. Large buildings are already an established part of the context as illustrated in View 10 of the HTVIA. The proposed building would be some distance away and would not be particularly dominant or intrusive. Any adverse impact would be negligible. The character and appearance would be preserved.

Harm and Public Benefits

- 9.52 The proposal would not have any direct impact on the fabric of any heritage assets, but it would cause harm to the significance of four important heritage assets.
- 9.53 It is possible that a much smaller development (or no development) may avoid harm to heritage assets, but that would not deliver the scheme's benefits in terms of housing, and although not tested, is reasonable to conclude a lower quantum of affordable housing. In addition, the development has attempted to minimise its harm through effective massing choices and being of a high standard design that has clear contextual narrative. Officers are satisfied that the benefits of the proposal could not be achieved, without that level of harm.
- 9.54 Having concluded that the scheme gives rise to “less than substantial harm” it is necessary to weigh that harm against the public benefits. As set out above, a reduced scheme in the various scenarios described above would be less beneficial in terms of affordable housing delivery. Therefore, the public benefits weighed against the scheme are as follows:
- the delivery of a significant quantum of housing, and contributing positively to the borough’s housing stock; and
 - a significant proportion of affordable housing, and

- improved public realm through widening of pavement and planting of three trees.

9.55 Officers are of the view that those public benefits would outweigh the less than substantial harm (even after giving great weight to heritage assets conservation) caused to the various heritage assets. Officers are satisfied that the approach adopted by the applicant in terms of design, heritage and townscape is sound and can be supported.

Height

9.56 The proposed scheme comprises a 29 storey tower on a corner site fronting onto the High Street. A 3 storey podium at the base leads to a visual break on the 4th storey which separates the podium from the 25 storey tower above. The visual proportions of the podium are designed to respond to the high street, whilst the tower complements the surrounding taller buildings.

9.57 The site is located in an emerging cluster of tall buildings within the Edge Zone. There is existing 21 storey Leon House, 16 storey Impact House, the 35 storey development at former Taberner House and 25 storeys at Wandle Road Car Park (both of which are under construction). In addition there are two tall buildings which are approved as part of the Leon House development, which are 20 and 31 storeys. There is also a 33 storey tower proposed at 4 to 20 Edridge Road, which has a resolution to grant from planning committee, subject to S106 agreement, that is currently being negotiated. The proposed height of the development would align and form part of coherent skyline within this part of Croydon.

Massing Approach

9.58 The development utilises a three storey podium level, with a recessed visual fourth floor level, which separates the podium from the 25 storey tower above. This allows the development to successfully balance its relationship at different scales.

9.59 At street level, the development has a distinct three storey podium element that responds both to the mass and proportions of the High Street. This allows it to successfully integrate into the more immediate high street setting, whilst also forming an appropriate base for the tower element. The fourth floor level is heavily recessed, which helps emphasis the form of the podium and provides a visual break to the tower. Difference between the tower and podium is also achieved, through the curved form of podium which is taken from the existing building, and its contrast with the more rectangular form of the tower.

9.60 The tower has a more slender form than the podium, particularly at its southern end where it staggers in. This narrowing of the form helps balance its mass, preventing the development being overbearing on the high street, as well as to the Grade II* listed Wrencote House in views from the south. The narrowing allows a more successful transition between the taller townscape of this section

of Croydon and the more modest scale of the high street to the north. The stepped form helps increase the number of dual/triple aspect homes within the scheme. The squarer bulky form at the northern end, is responsive to the building line, and viewed more commonly in the context of other taller elements of surrounding developments and appropriate.

Elevational Design

- 9.61 The elevational approach to the building's design aligns with the approach taken in regards to massing. The concept of the design is to create a building of two elements, which are visually distinct, but related through form. A podium that responds to the architectural language of the high street condition through its façade articulation and materiality, and a tower responding to the wider Croydon townscape. The tower's design seeks to draw upon and articulate a contemporary reinterpretation of the mid-century heritage of Croydon in its expression. This is articulated robustly on the façade both in form and materiality, and is distinct from surrounding design approaches, to give the building its own identity within this cluster.
- 9.62 The elevational concept has taken particular inspiration from the uniform gridded articulation of neighbouring Leon House, whilst evolving its principles to create a domestic and crafted residential typology, which reflects the mid-century heritage. Each elevational plane is visually outlined by a bold frame with the finer grid articulation within. The framing helps to provide visual slenderness and macro articulation. The grid is recessed within the frame and expressed as thin structure elements. Each grid module has a uniform response to form. The current design uses interlocking fins in a herringbone form to create areas of solid, which surround standard openings for fenestration or balconies. Both at a macro and micro scale the continued development of depth, angled and faceted forms within the façade would complement the subtle neutral tones of the proposed materials by adding texture through light and shadow.
- 9.63 The tower has a flat roof, responsive to general flat roof design of surrounding tall buildings, with its mass alleviated through staggering of the façade form.

Public Realm

- 9.64 The site with its limited footprint provides limited opportunities for public realm improvements. At early stages of the design of the development, options that explored recessing the building back at lower levels in order to create greater pavement width were considered. However, these were unsuccessful as they prevented the podium responding appropriate to the more back of the pavement form of the high street, whilst also limiting the ability to provide sufficient space for the tower.
- 9.65 The principle improvement to the public realm would be at the corner, where the pavement width would be increased and three trees planted. This would help improve both visual amenity and pedestrian environment, whilst also helping the function of the development with the main entrance/exit being located at this point. This would also help improve connectivity between the high street and new development emerging to the East, and other infrastructure beyond. The

proposed trees species are appropriate for both this environment, as well as the function that they need to perform as wind mitigation. Provisions for further improvements to the surrounding public realm on High Street are to be included in the s.106 agreement and recommended conditions.

- 9.66 Given the limited opportunities within the site, given its small footprint and active frontage, a financial contribution to Public Art is recommended to be secured through the S106 Agreement.

Designing Out Crime

- 9.67 The proposal was considered by the Metropolitan Police Service's Designing Out Crime Officer, who advised that the site is in a high crime area, and identified potential concerns. Some of those concerns, for example the recessing of the front entrance, have begun to be addressed by the applicant. The Designing Out Crime Officer has confirmed that with few changes Secure By Design accreditation could be achieved, and that this could be done via condition. Such a condition is recommended.

Impact on Neighbouring Properties' Living Conditions

Daylight and Sunlight Impacts

- 9.68 The applicant has submitted a sunlight and daylight study that tests the scheme against guidance contained with BRE's 'Site Layout Planning for Daylight and Sunlight - A Guide to Good Practice' End Edition, 2011'. See Appendix 2 for BRE sunlight and daylight definitions. The assessment measures the impact of the development on the following properties; Impact House, 90 to 94 (even), 100, 106 to 108a (even) and 110 High Street.
- 9.69 Mayor of London's Housing SPG states the following: "Policy 7.6Bd requires new development to avoid causing 'unacceptable harm' to the amenity of surrounding land and buildings, particularly in relation to privacy and overshadowing and where tall buildings are proposed. An appropriate degree of flexibility needs to be applied when using BRE guidelines to assess the daylight and sunlight impacts of new development on surrounding properties, as well as within new developments themselves. Guidelines should be applied sensitively to higher density development, especially in opportunity areas, town centres, large sites and accessible locations, where BRE advice suggests considering the use of alternative targets. This should take into account local circumstances; the need to optimise housing capacity; and scope for the character and form of an area to change over time
- 9.70 The degree of harm on adjacent properties and the daylight targets within a proposed scheme should be assessed drawing on broadly comparable residential typologies within the area and of a similar nature across London. Decision makers should recognise that fully optimising housing potential on large sites may necessitate standards which depart from those presently experienced but which still achieve satisfactory levels of residential amenity and avoid unacceptable harm."

9.71 Given the site is located in an area of High PTAL, located within the Croydon Opportunity Area, and in an area that features tall buildings, with further planned through site allocations as well as consented, it is an area in which the provision of a high density residential led development is generally encouraged in order to optimise housing delivery. It is a location therefore in which it is considered appropriate to set alternative target values.

9.72 In order to aid assessment of the impact of the development on neighbouring properties' light conditions, the following categorisation has been used.

Significance	Ration reduction of former value
Negligible	1.0 to 0.8 (i.e. more than 80% former value)
Minor Adverse	0.7 to 0.8 (between 70 to 80% of former value)
Moderate Adverse	0.6 to 0.7 (between 60 to 70% of former value)
Major Adverse	less than 0.6 (below 60% of former value)

Impact House

9.73 302 windows were tested in relation to VSC. 156 of which had a score below 27%. The distribution of those scores are shown below:

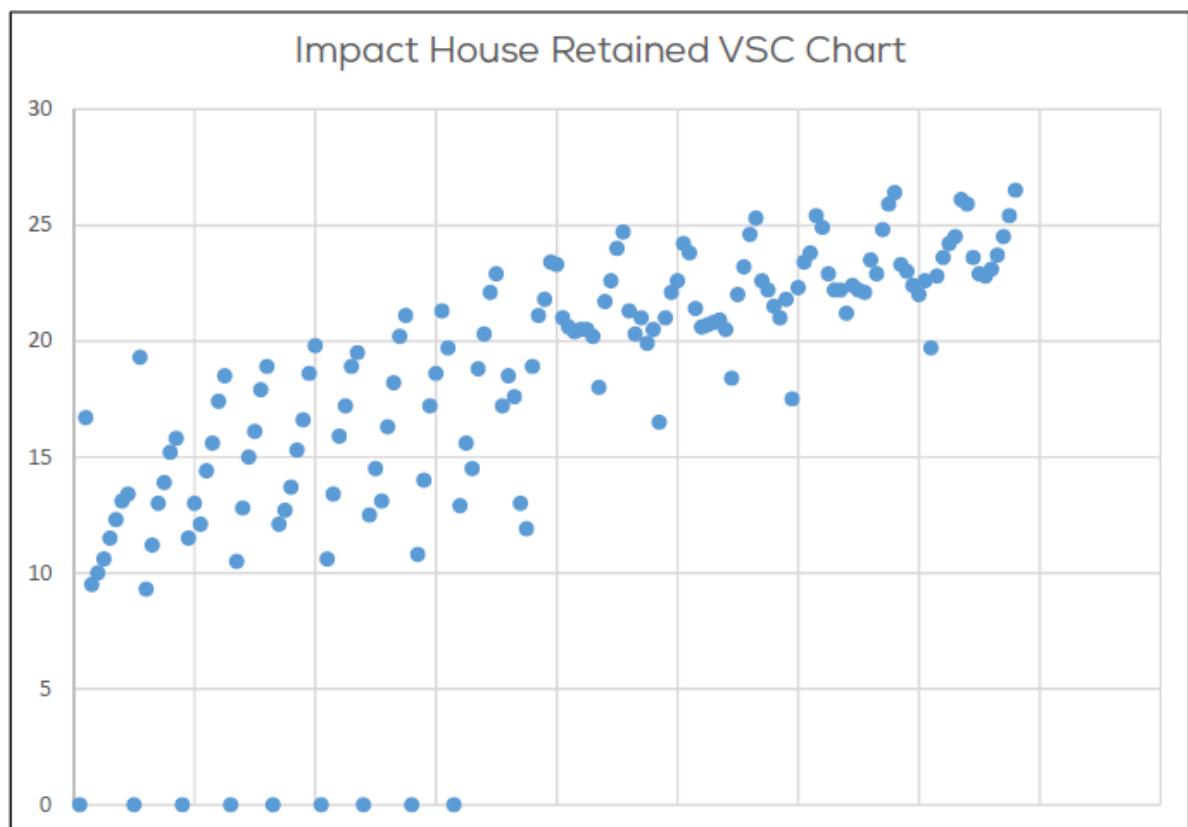


Fig 10 – Retained VSC score on Impact House

9.74 In terms of VSC ratio reductions, the results of the development on Impact House are as follows:

Vertical Sky Component – VSC

No. of Windows	BRE Compliant	20% to 30% Reduction	30% to 40% Reduction	40%+ Reduction
302	146	2	61	93

9.75 The applicant has quoted a GLA Representation Hearing Report (GLA Ref: GLA/3776a/03) which noted that; “the 27% VSC recommended guideline is based on a low-density suburban housing model and in an urban environment it is recognised that VSC values in excess of 20% are considered as reasonably good, and that VSC values in the mid-teens are deemed acceptable.” Officers consider that the lowest value that could be classed as mid-teens is 15% and is considered a reasonable alternative value target to set given the location of the site and benefits derived by the development. Using this as alternative target, 40 windows would fall below the proposed alternative value target.

9.76 The BRE guidance states that “*a larger relative reduction in VSC may also be unavoidable if the existing window has projecting wings on one or both sides of it*”. The applicant argues that for 29 of the 40 windows that fall below the alternative VSC target, these are partially impacted by the 10 storey form of the western element and/or the existing mass of Wrencote House, that both act like projecting wings. In addition, two further impacted windows are located at ninth floor level with the balustrade/parapet of the roof terrace playing a significant contributing factor to these windows performance. Whilst the proposed development would have a significant impact on these 31 windows, in the context of the proposed developments’ location and need to optimise housing delivery in sustainable locations, giving weight to the public benefits the development provides and given the argument placed forward regarding the wing form, the impact on these windows in terms of VSC, on balance is acceptable.

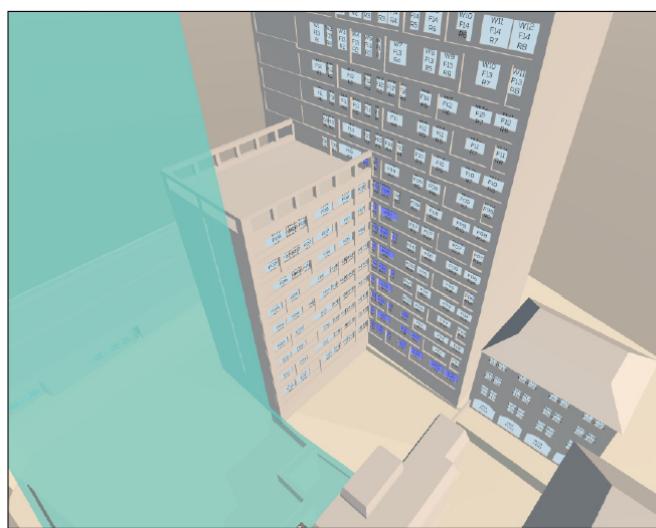


Fig 11 – Windows on Impact House which would have a retained VSC below 15% shown in Purple.

9.77 Nine remaining windows which fall below the alternative target value are located on the façade of Impact House closest to the proposed development. All these windows are major failures, with resulting VSC values of 0. Impact House was converted from office space to residential units under Prior Approval (ref 15/02723/GPDO), with exception of the sixth to eight levels of the eastern and

western wings, which were added under planning permission (ref 16/04750/FUL). The relevant part of the approved layouts of both approvals are shown below:

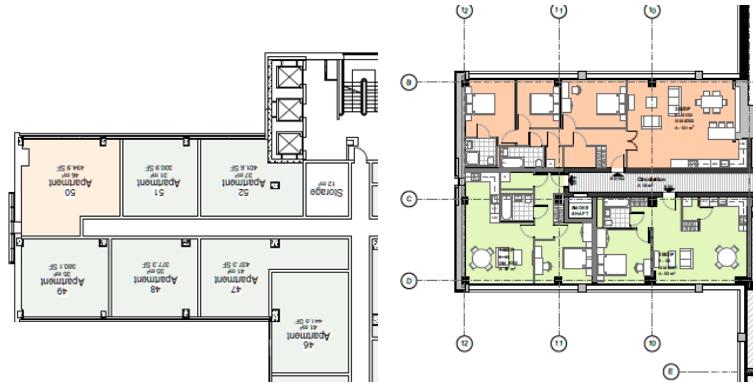


Fig 12 – Left – Floorplan approved under GPDO 2015 application (note limited details needed for GPDO)
Right – Floorplan approved under 2016 planning permission

- 9.78 Under the relevant permitted development regulations daylight and sunlight amenity was not a valid consideration, nor the layout of the units. The developer of this site appears to have given little consideration to protecting the amenity of future residents of their scheme by considering the future development of neighbouring sites when designing their layout. The placing of habitable bedroom windows on a secondary flank elevation whose only source of light is over neighbouring land, and from windows which are unneighbourly by virtue of their close proximity to the boundary, is poor design. It is common that light condition for windows located on a flank elevations to be given less weight and low protection in planning decisions. So whilst the impact of the proposed development on the light and outlook of bedrooms within Impact House is extremely high, it is not considered reasonable to limit the development potential of this site on this basis. Given those windows on sixth to eighth floor are secondary windows, the impact of the development on these windows light is acceptable.



Fig 13 – Windows on Impact House highlighted closest to the development.

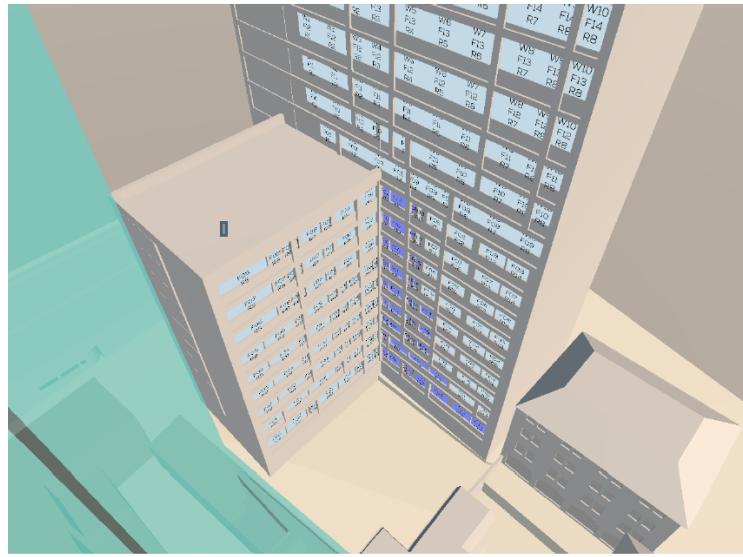


Fig 14 – Windows on Impact House which would have a retained VSC below 15% shown in Purple.

- 9.79 In regards to NSL, 172 of the 220 (78.2%) rooms assessed are BRE Compliant. A summary of the result are shown below. From the 48 failing rooms, 21 are living/kitchen/dining rooms. For the 27 rooms which are bedrooms, where their primary purpose is sleeping, it is considered appropriate to apply flexibility especially given the site's location. Refusal is not recommended on the basis of the impact of the development on these bedrooms. Of the 21 living/kitchen/dining rooms, only 4 would be major fails (greater than 40% reduction), but these rooms would retain in excess of 49%, which on balance is acceptable given the site's location. In conclusion, giving weight to the public benefits the development provides and given the argument placed forward regarding the wing form, the impact on Impact's House daylight, on balance is acceptable.

No Sky Line – NSL

No. of Rooms	BRE Compliant	20% to 30% Reduction	30% to 40% Reduction	40%+ Reduction
220	172	22	6	20

Fig 15 – NSL reductions for Impact House.

- 9.80 In terms of sunlight, all but twenty windows would pass BRE guidelines. Seven of these serve rooms, which have access to another window, and as result would receive adequate sunlight. Six of the twenty windows are located on the western façade of the development closest to the boundary, which as explained above, it is considered unreasonable to refuse planning permission on the basis of loss of light. Four of the twenty window would only experience minor adverse changes of no greater than 27.6%. The remaining windows are located on ninth floor level facing onto the terrace, and their poor performance is attributed to architectural features of Impact House, including heavy recesses and terrace parapets. The impact of the development on Impact Houses sunlight is acceptable.

90 to 94 High Street

- 9.81 All windows within 90 to 94 High Street would retain VSC in excess of 20%. They would experience a minor ratio reduction between 20.2% and 28.3%. The affected rooms would be fully compliant in terms of NSL. Due to the angle that

the windows face, BRE sunlight tests do not apply. The development has an acceptable impact on light of 90 to 94 High Street.

100 High Street

- 9.82 All but two windows, which are located at first floor level, would achieve a target VSC value of 15%. The remaining windows would receive a VSC value of between 14 and 15%, with a ratio reduction of between 40 to 43%. The impacted windows are based on plans submitted in connection with 2016 planning permission understood to be bedrooms. In terms of NSL, the first floor bedroom is a minor fail, with ratio reduction of 25.2%. Due to the angle that the windows face, BRE sunlight tests do not apply. Given these are bedrooms where a lower standard of light can be appropriate, the development has an acceptable impact on light of 100 High Street.
- 9.83 The applicant has also considered the Cumulative Impact if Edridge Road development reference 18/06069/FUL is approved and built, with VSC values upwards of 13.1%, with minor NSL failure increasing to 26.8%. These values are acceptable given that they serve bedrooms.

106 108 High Street

- 9.84 All windows would receive over the alternative target value of 15%. In terms of NSL, the proposal is compliant. Due to the angle that the windows face, BRE sunlight tests do not apply.
- 9.85 In the cumulative scenario, all windows would retain in excess of 15% VSC, with the exception of two windows in 108 High Street. These retain 13.5% and 14.8%, however the rooms which these windows serve benefit from mitigating windows and as such would still receive good levels of light. The proposal would remain compliant in NSL terms. The impact in a cumulative scenario is acceptable.

110 High Street

- 9.86 The proposal is fully BRE compliant in the proposed scenario. In the cumulative scenario, all windows retain VSC above the alternative target value, with significant impact coming from Edridge Road development. In terms of NSL, two would have minor adverse impact with reduction of between 20 to 21%. Sunlight tests are not relevant due to the angle at which the windows face. The proposed development would have an acceptable impact on light of 110 High Street.
- 9.87 The proposed development would not have an unacceptable impact on the light and working conditions of surrounding commercial units.

Outlook, Privacy, Noise and Disturbance

- 9.88 In general, and with exception of the windows on the western flank elevation of Impact House closest to the development, there would be very good separation distances of over 18m. This would ensure good outlook and privacy would be maintained for neighbouring properties' windows.

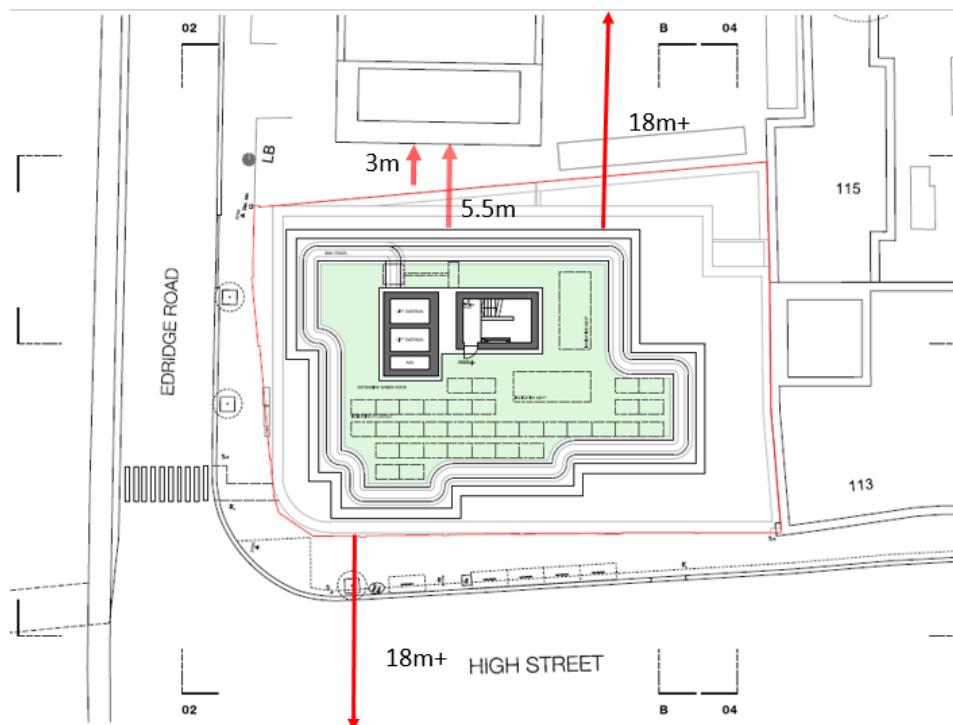


Fig 16 – Approximate separation distances

9.89 In terms of the habitable room windows on Impact House located on the western flank closest to the development, the windows at first and second floor level separation distance would be reduced to approximately 3m. On floors three to eight due to the more recessed form of the tower, the separation distance would increase to approximately 5.5m. This separation distance whilst small is not uncommon between windows located on flank elevations. Whilst there would be a significant loss of outlook to these windows, given the direction they face and the impacted windows close proximity to their own boundary, it would not be reasonable to refuse planning permission on this basis. There are no windows at ground floor level on Impact House.

9.90 In terms of privacy, there are no windows on the development at first and second floor levels at the point closest to Impact House. At podium (third floor) level there would be opaque glazing and a 1.6m privacy screen, both of which are recommended to be secured by condition. On the upper levels, there is a section of blank wall in the area immediately in front of the relevant window on Impact House which prevent direct overlooking, with the other windows set off at angle which limits natural views. At ninth floor level and above, the development would overlook external communal roof top amenity space located on top of the western wing of Impact House. The views of this space from the development are acceptable given that it is a communal external amenity space and already overlooked by windows in Impact House.

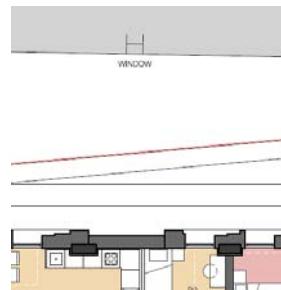


Fig 17 – Impact House window relationship to blank wall of development/openings.

Noise

- 9.91 The proposed flexible A1/A2/B1 uses at ground and mezzanine level due to their limited size would not through their direct operation cause a significant increase in noise disturbance, given they exit straight onto the high street and that they replace similar type of uses.
- 9.92 There is potential for the B1/D1/D2 flexible use units located at first and second floor level due to their size and potential nature of the use that includes crèches and gyms, to cause disturbance to both units within the development and to adjacent neighbouring properties if they are not sufficiently managed and controlled. A condition restricting opening hours between 7am and 11pm, a condition requiring noise and service management plans to be submitted and to restrict noise from plant and machinery are recommended. Noise impacts during construction are also recommended to be mitigated by condition. Overall the proposed development, subject to conditions, would not have a significant impact on neighbouring amenity.

Impact on Surrounding Environment

Wind

- 9.93 A wind tunnel assessment of the impact on local wind conditions has been undertaken. This has included testing wind conditions in the existing situation, with consented cumulative surrounding building in place, as well as those schemes with resolution to grant (namely 4 to 20 Edridge Road and Leon House) in place. Please note Leon House has not been granted at the point the wind tunnel test had been carried out.
- 9.94 In the baseline scenario, i.e. present conditions without the proposed development, during the windiest season, wind conditions would be suitable for sitting and strolling uses in both the existing site conditions and as well as with already consented/resolution to grant development surrounds scenario.
- 9.95 Without wind mitigation measures, as a result of the proposed development wind conditions would be windier from the junction of Edridge Road up to the entrance of Impact House, with strolling and walking conditions being more prevalent than under the two baseline scenarios. Also significantly, there would also incidences of unsafe wind conditions for pedestrian and cyclists on Edridge Road adjacent to the proposed main entrance and slightly to the West of the site.

9.96 To address this safety issue, and to ensure wind conditions are more comparable to existing conditions, the applicant has altered the design of the building by proposing to install a pergola at podium level, reducing the size of the recessed lobby and inserting fin on the eastern elevation. Critically, three 6m high evergreen trees are required to be installed on the pavement on Edridge Road. Further discussion on the merits of these trees and necessary alterations to the public realm/highway are discussed in the design, highway and tree sections of this report respectively.

9.97 With the mitigation measures outlined above, wind conditions would be similar to existing, with sitting/standing conditions, with only isolated strolling conditions on surrounding pavements. All safety concerns would be resolved, with exception of one occurring on the flyover, where pedestrian are not present and cycling is not advised. It is important to note that this safety concern does not appear to be caused by the development itself, but cumulative impact of previously approved developments. The proposed development would not cause wind conditions which are considered unsuitable for the intended use or which would pose a risk to public safety.

Contamination

9.98 A phase 1 Geoenvironmental desk study report was submitted with the application. The submitted report concludes that the overall risk rating for the site is assessed as being low/moderate, with further site investigation and potentially mitigation required. This is recommended to be secured via condition.

Air Quality

9.99 The site is in an Air Quality Management Area (AQMA) and is located adjacent to the A232, where exceedances of the National Air Quality Objective for NO₂ often occur. An Air Quality Assessment has been submitted and is recommended to be secured via condition. With the limited number of car parking spaces and proposed energy generated through Air Source Heat Pumps, the development would have an insignificant impact on local environment air quality. In terms of Transport Emission and Building Emission the development would be classed as Air Quality Neutral, in line with policy. The main air quality impacts would be from construction, which can be appropriately mitigated through routinely used methodologies, secured through condition.

9.100 The development would be mechanical ventilated, and subject to intakes and exhausts being located in appropriate locations, as set out in the submitted Air Quality Assessment. This would ensure appropriate air conditions within the homes. These recommendations are recommended to be secured by condition. A contribution towards air quality improvements to mitigate against non-road transport emissions is recommended to be secured via the S.106 agreement, and a condition is recommended to ensure that the construction impacts on air pollution are mitigated

Flooding

9.101 The site is located in Flood Risk Zone 1 as defined by the Environmental Agency, where the annual probability of fluvial and tidal flooding is classified as less than 1 in 1000 years. In terms of surface water, the site has a very low

classification, which corresponds to annual probability of flooding less than 1 in 1000 years. The street to the front of the site is at low risk of surface flooding, which corresponds to annual probability of flooding less than 1 in 100 years.

9.102 The existing site is fully built over and containing impermeable surfaces, as such all surface water flows directly into the mains. The proposed development is proposing to use green roof systems on the top floor, podium level and on small area at rear first floor level. Attenuated storm water would be stored under the building and discharged at a controlled rate into the surface water drain. It is not possible to directly infiltrate into the ground, and therefore the proposed SUDS method is appropriate, and would be a significant improvement on the existing situation. The proposed drainage strategy has been reviewed by the LLFA, whom raise no objection. A condition is recommended to ensure compliance with the stated SUDS strategy.

9.103 Thames Water were consulted on the application, and have recommended a condition in regards to piling. They have also provided further comments which are recommended to be added as an informative.

Light Pollution

9.104 An exterior lighting strategy has been submitted which is appropriate and would ensure that the development would not cause excessive light pollution. The exterior lighting strategy is recommended to be secured via condition.

Sustainable Design

9.105 Policy SP6.2 requires new development to minimise carbon dioxide emissions, including that new dwellings (in major development proposals) must be Zero Carbon. As a minimum a 35% reduction in regulated carbon emissions over Part L 2013 is required, with the remaining CO₂ emissions to be offset through a financial contribution. The policy also requires major developments to be enabled for district energy connection unless demonstrated not to be feasible.

9.106 The scheme is expected to achieve at least a 35% reduction in regulated carbon emission and up to 40% through a combination of energy demand reduction measures and the heat network. The remaining regulates CO₂ emission shortfall would be covered by a carbon offset payment which would be secured through a S.106 Agreement.

9.107 A 10.8% carbon emission reduction would be achieved through the use of passive and energy efficiency measure, exceeding the 10% minimum required by the GLA. For non-domestic areas a 19.5% reduction is achieved through the use of passive and energy efficiency measures, exceeding the 15% minimum required by the GLA.

9.108 Roof mounted photovoltaic panels and use of roof mounted Air Source Heat Pumps and a Water Source Heat Pump for space hearting, domestic hot water and water based chillers in non-domestic areas. Use of domestic areas this would achieve a further 46.8% carbon emission reduction. For non-domestic areas a further 27.5% reduction is achieved.

- 9.109 In total for residential areas the development would achieve a 57.7% reduction compared over Part L 2013, non-domestic a 47% reduction compared over Part L 2013 would be achieved. A total of 1376.9 Tonnes of CO₂ would be required to be offset, which would be secured through a s.106.
- 9.110 Whilst no district heating networks currently exist, the site is in an area where one is planned. The applicants have made allowances within their design to allow future connection to heat network, by creating a centralised single energy centre that would serve the apartments, amenity spaces and commercial units. A single point of connection has been allowed for at mezzanine level, including plant space for a metering rig. A s.106 obligation is also recommended requiring connection to the District Heating System if the council has appointed an operator before commencement on site, or a feasibility into connection to a future system on first replacement of the heating plant. On this basis, the proposal is acceptable.

Water Use

- 9.111 A planning condition is recommended to secure compliance with the domestic water consumption target of 110 litre/person/day, to ensure sustainable use of resources.

Biodiversity

- 9.112 Policy G5 of the London Plan (2021) states that major development proposal should contribute by including urban greening. The London Plan set outs that borough's should develop their own urban greening factor, but in the interim suggest a target score of 0.4 for developments which are predominantly residential. Policy G6 of the London Plan (2021) sets out proposals should manage their impacts on biodiversity and aim to secure net biodiversity gain.
- 9.113 The site at present has little biodiversity value, with it almost fully taken up with either built form or hard landscaping. There is no existing greenery to retain on the site. A sedum roof would be provided at rear first floor level and at the top of the tower. At podium level an intensive green roof would be provided, with a range of planting, including sedum shrubs and perennial planting, small multi-stem trees and communal growing beds. All paving would be permeable. The development is estimated to achieve an urban greening score of 0.365. It should be noted that this does not include the trees that would be planted in the public realm. Whilst the development falls marginally below the urban greening target for residential developments, this is justifiable given the site restraints that limits the potential for further urban greening and given the extremely poor existing condition of the site.

Transport, Parking and Highways

Parking

- 9.114 The site has a Public Transport Accessibility Level of 6b (best), and is close to a wide range of facilities and services. This section of the High Street is located within the Central Controlled Parking Zone. The provision of car free development, with exception of disabled parking space is supported. Residents'

eligibility for parking permits is recommended to be restricted through legal agreement.

- 9.115 Four designated disabled person parking spaces are proposed at Mezzanine Level to the rear of the building. This provision complies with London Plan (2021) Policy T6.1 Residential Parking that requires 3% of dwellings to be provided with one. The policy requires it to be demonstrated how a further 7% could be provided in the future. The applicant has looked at existing on street provision and notes that twelve blue badge spaces are available in three car parks within 280m of the site, and 10 on street within 200m. Given the existing capacity, the requirement to demonstrate how further provision could be provided through a parking management plan condition is not considered necessary. No objection is recommended to be raised in this regards.
- 9.116 All four parking spaces would be provided with active electric vehicle charging provision which exceeds London Plan (2021) requirements. This is recommended to be secured via condition.

Cycle Parking

- 9.117 A total of 210 long-stay and 4 short-stay cycle parking spaces for residents, plus 17 long-stay and 8 short stay cycle parking spaces for the commercial use is proposed, which complies with policy requirement set out in the London Plan (2021). The cycle parking design has been revised to accord with the London Cycling Design Standards. Shower and changing facilities are also provided within the commercial units.

Deliveries and Servicing

- 9.118 A draft delivery and servicing plan was submitted with the application. Smaller delivery vehicles would be able to access the site from Edridge Road and a space is provided for them within the car park, with larger deliveries and servicing is proposed to take place from the High Street. It is estimated that 80% of all vans would be able to access the rear service bay. Larger vehicles are unable to enter the site due to headroom requirements. A concierge service would be provided for residential use to reduce the impact of deliveries. A condition is recommended to secure final delivery and servicing strategy.

Pavement/Junction Changes

- 9.119 Preliminary design drawings alongside a stage 1 Road Safety Audit have been submitted for the proposed creation of new access point and for the widening of the pavement. This has been reviewed by the Highways team who are satisfied that the proposed development and associated changes to the highway would not cause harm to pedestrian and highway safety. TFL have also confirmed that they consider the junction alteration to be acceptable, and would not cause unacceptable bus delays.

- 9.120 The proposed widening of the pavement both at the junction and along Edridge Road would enhance the public realm and offer an improved pedestrian

environment. The proposal would also by utilising improvements made to highway design, would also improve the visibility and usability of the cycle lane. The proposed changes to the highway would promote sustainable modes of transport.

Waste and Recycling

- 9.121 Separate commercial and residential refuse provision is provided with the development, with the latter easily accessed via the main lobby. A bulky waste storage area has also been provided. The level of waste and recycling provision is in line with council's guidance. As set out in the draft waste management plan, on site management would assist waste collection operatives to ensure bins can be collected efficiently. There are some minor inaccuracies and clarification required in regards to waste management plan, such as frequency of collections, and such a final waste management plan is recommended to be secured by condition.
- 9.122 Policy SI 7 Reducing waste and supporting the circular economy of the London Plan 2021, requires referable application to promote circular economy outcomes and aim to be net zero-waste. This includes reusing/recycling of material from demolition, how the design and construction would reduce material demands and how waste/recycling would be managed as much as possible on site, adequately stored and managed in accordance with the waste hierarchy. The applicant has submitted a circular economy statement that sets out how the development would and could meet these objectives. A condition is recommended requiring both the compliance with the recommendations set out in the report, and the submission and approval of the post completion report.

Sustainable Transport

- 9.123 Given that the development would be car-free, increased walking, cycling and public transport use is expected. The impact of additional development within the Croydon Opportunity Area, including the proposed development, is expected to require upgrades to existing services and therefore a sustainable transport contribution is to be secured in the s.106 agreement to mitigate the impacts of the development and secure improvements to include highway, tram or bus infrastructure.
- 9.124 A Healthy Streets Transport Assessment (TA) including Active Travel Zone (ATZ) assessment has been submitted to support the application in line with TfL's guidance.
- 9.125 In order to ensure that the identified modal shift is adequately supported, and barriers to uptake of more sustainable transport modes can be addressed, a Travel Plan and monitoring for three years is to be secured through the s.106 agreement.

Other Planning Issues

- 9.126 In line with policy DM16 of the Croydon Local Plan (2018) a health impact assessment was submitted which identifies that the proposal would provide high standard of housing, which helps promote sustainable travel through the provision of policy compliant cycling offer and due to its appropriate location and would minimise car usage, would reduce flood risk through the intergration of SUDS, has good access to health, social and retail facilities, open space, and would be environmentally sustainable. Local employment opportunities would be secured through the S106. The proposal complies with Policy DM 16.
- 9.127 London Plan (2021) Policy D12 Fire Safety requires all major developments to be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party, suitably qualified assessor. The applicant has supplied a Fire Strategy Report dated 24th November 2020, produced by AESG. The Fire Strategy outlines measure such as specification of fire detection and alarm, units would be fully sprinklered, and both lifts provided would be fitted with fire curtains to prevent smoke entering into the flats. There would be a defend in place evacuation strategy, which is designed to work holistically with the compartmentation and common corridor ventilation system. The statement also identifies further reviews at detailed design stage. The report outlines fire safety consideration in relation to materials. It sets out fire service access arrangements, including protected routes that achieve 120mins fire resistance, provision of firefighting stair and two firefighting lifts. Wet riser would also be provided. As with all developments, the matter of fire safety compliance is covered by Part B of the Building Regulations. For the purpose of planning, Fire safety has been sufficiently considered at an early stage in the design of the building, which would help ensure compliance at Building Regulation stage.
- 9.128 A TV and Radio Signal assessment has been submitted with the application. The study concludes that the proposed development may cause minor short-term interference to digital satellite television reception in localised areas around the application site. This would cover the 190m to the north east of the site, which includes the council's offices. Any digital satellite television use could resolve the issue by relocating the satellite dishes to different location where views are no longer obscured. An appropriately worded obligation is recommended to be secured through the S106.
- 9.129 Croydon Local Plan policy SP3.14 and the Planning policy including the adopted Section 106 Planning Obligations in Croydon and their Relationship to the Community Infrastructure Levy – Review 2017 sets out the Councils' approach to delivering local employment for development proposal. A financial contribution and an employment and skills strategy would be secured as part of the legal agreement.
- 9.130 The development would be liable for both Mayoral Community Infrastructure Levy (CIL) and Croydon CIL. The collection of CIL would contribute to provision of infrastructure to support the development including provisions, improvement, replacement, operation or maintenance of education facilities, health care facilities, and opens space, public sports and leisure, and community facilities.

10 Conclusion

- 10.1 In this instance a balanced decision is needed to be taken. The development would cause less than substantial harm to heritage assets as identified in the body of the report and would also cause significant harm to amenity of neighbouring properties particularly in Impact House. In the developments' favour it delivers many positives, including the provision of a significant quantum of high quality housing in a sustainable location, would provide affordable housing, improved public realm, help address surface water flooding and enhance biodiversity. It is considered that weighing these positives against the negatives (even after giving great weight to the preservation of heritage assets), that the scheme as a whole is acceptable, and that planning permission is recommended to be granted in line with the details of the decision set out in the RECOMMENDATION.