

162 Gillett Road, Thornton Heath, CR7 8SN

Design and Access Statement

Planning application – For proposed internal reconfiguration and refurbishment to increase the number of units with a change of use from 18 bedsits (previously) to a total of 23 HMO units.

Prepared by: Valur Consulting Ltd.

Revision: A

Date: 05.01.2023



1.0 Introduction

1.1 This Statement has been prepared to support a planning application for proposed internal reconfiguration and refurbishment to increase the number of units from 18 bedsits (previously) to a total of 23 HMO units. The 18 units on first and second floor to have their own private ensuite shower rooms with shared communal kitchens, one kitchen located on each floor. The ground floor comprises of 5 HMO with ensuite shower rooms and private cooking facilities, shared communal area and staff facilities.

2.0 Site and Surroundings

2.1 The application site is located on the west side of Gillett Road, close to the junction with High Street. The land is relatively flat. A 3-storey building clad in yellow and white render with red brick and green window frames occupies the site. It is currently vacant. The current use is Sui Generis comprising of 18 bedsit units with shared kitchen and shared shower rooms.

2.2 The site falls within the Thornton Heath District Centre and Primary Shopping Area and the Thornton Heath 'Place area'. The surrounding area is urban, comprising residential properties along Gillet Road and commercial spaces on High Street with some residential above. The site has a PTAL rating of 3.



2.3 An extract from the Location Plan is included at Figure 1 below.

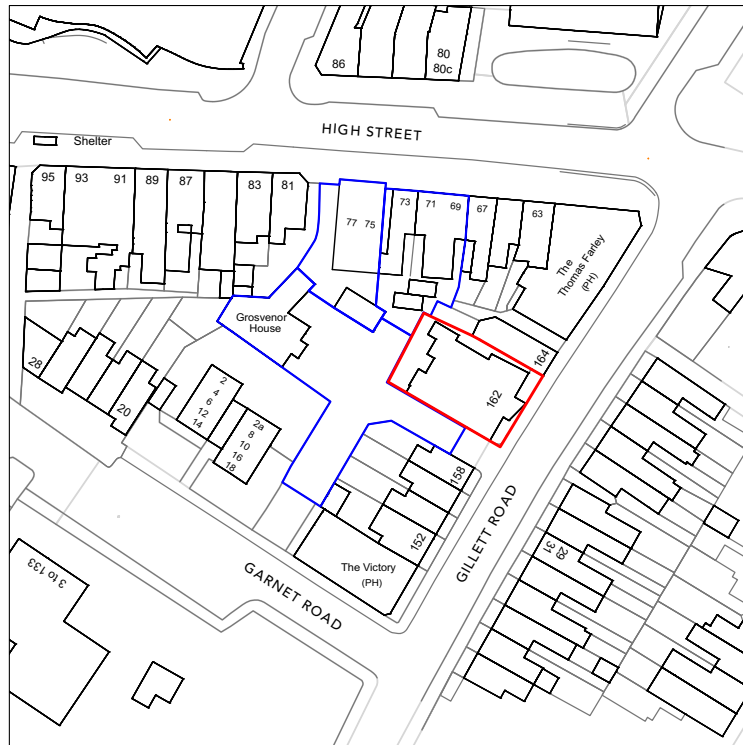


Fig 01. Location Plan 162 Gillett Road

3.0 Background and Relevant Planning History

3.1. 06/00844/P: Siting of roof mounted wind turbine – permission granted 26.04.2006

3.2. 23/02889/PRE: Proposed internal reconfiguration and refurbishment to increase the number of units from 18 bedsits for young adults (previously) to a total of 27 units comprising 20 bedsits with shared wet rooms and 7 self-contained wheelchair accessible units.

3.3. Following the Pre-application advise the applicant has decided to make adjustments to the scheme by reducing the number of units from 27 to 23, remove kitchen facilities within the rooms on first and second floor and provide two larger shared kitchens. The ground floor units have been reduced to 5 in total to provide a communal living space and allocated on site staff area. The scheme is seeking a change of use between Sui Generis (bedsit supported living of 18 units) to Sui Generis Large HMO of 23 units

4.0 Proposed Scheme

The current scheme has been redesigned in response to the pre-application advice received and involves the following:

- Change of use from 18 bedsit as supported living to 23-unit HMO.
- Reduction of units from 27 at pre planning application stage to 23.
- First and second floor units (18 in total) will have ensuite shower rooms and are aimed for single occupancy. Cooking facilities removed from all units.
- Shared kitchens are being proposed on first and second floor.
- Ground floor units reduced from 7 to 5 in order to provide a communal space and dedicated staff / reception area.
- All units meet Croydon's HMO space standards, (where the minimum requirement for a single occupancy rental unit with an ensuite is 12.5m²)
- Number of cycle stands has been increased to 24 in total.

- Bin store design has been amended to allow for larger communal bins, Comingled and paper recycling bins and well as bins for food waste have been allowed for.
- No changed are being made to the external appearance of the property.

5.0 Response to Pre-application Feedback

Principle of development

Officers comment (1): It is difficult to give a clear steer on the principle of development based on the information provided.

Officers comment (2): The classification of uses is important in planning terms. It is understood that the former use of the building was a type of specialist accommodation providing communal living with an element of care for the residents. There was communal living space on the ground floor along with meeting/office spaces and space for staff. The use was a sui generis use.

Officers comment (3): The applicant explained during the meeting that the proposed use would be a 'supported accommodation'. It is, however, notable that no space for support staff is shown on the plans and there is no communal space proposed. The plans suggest that the change of use is to self-contained bedsits in a type of accommodation that is more akin to a large HMO.

Officers comment (4): A large HMO or supported/specialist living would both be sui generis uses and planning permission is required to change between sui generis uses.

Response: The scheme is for a change of use from an 18-bedsit supported living to a large HMO (23 units) with dedicated communal area and staff facility.

Quality of accommodation – HMO

Officers comment (1): As proposed, each unit has a private kitchenette and space for a double bed and a small table. Each unit has a window for outlook and ventilation. The Council's HMO standards document outlines that a single room with a kitchen for 1 person should be 13.5sqm in area, or 18.5sqm for 2 people, whereas the proposed rooms are generally smaller than this. Wet rooms are proposed on a 1:1 basis but these are accessed from the communal corridors. The Council does not have any guidance on whether wet rooms should be accessed from private or communal spaces; this can be guided by the proposed use.

Response: All units are currently single occupancy, cooking facilities have been removed from the units on first and second floor, ensuite shower room now provided. Minimum space requirements for single rooms with ensuite shower room according to Croydon HMO standards is 12.5m² – all the rooms on the first and second floor meet those requirements.

Officers comment (2): A 27 room HMO would result in a significant number of people living within the building, with very small living accommodation with no opportunities to dwell, linger or socialise outside of the main bedroom spaces. The layout is very cramped and would not be supported by Officers as proposed.

Response: The proposal has reduced the units from 27 to 23 with communal space on the ground floor for socialising. All the rooms are single occupancy resulting in only 5 additional people living in the building.

Accessibility

Officers comment: *"No lift is existing or proposed within the building so upper floor units cannot be accessible in a step-free manner. Given that the proposal is a refurbishment rather than a new build, this approach could be justified, however please refer to London Plan policy D7 in providing a justification."*

Response: The Ground Floor is designed to have a step free access. The 5 units on the ground floor are 'wheelchair adaptable'. Corridors and access through doors have been designed in order to allow wheelchairs to pass through.

External space

Officers comment: *"The existing building fills almost the entire plot so there is no external amenity space existing or proposed. Please address this point in any subsequent proposal in relation to demonstrating that a good quality of accommodation for prospective residents is proposed."*

Response: The Site doesn't allow external amenity space; the existing property already fills in most of the plot. The site requires bin and bicycle storage which has been designed to occupy most of the free space at the rear of the property.

Highways

Officers comment: *"The PTAL rating of the site is 3 (moderate) and the site is within the Thornton Heath Controlled Parking Zone (CPZ) which allows parking only within designated bays Monday to Saturday 9am to 5pm for permit holders only."*

Car parking

Officers comment: *"There is no on-site car parking for the building existing or proposed. Given that the site is within a CPZ, a car-free scheme is acceptable and the Council would be likely to remove the ability of future residents to gain parking permits in the CPZ in order to limit car use (depending on clarification of the proposed use). This would be achieved by way of a S106 legal agreement."*

Response: The applicant agrees to the principle of a legal agreement to prevent tenants from obtaining parking permits. The applicant would be grateful for a template for either a s106 or Unilateral Undertaking if available. If not available, the applicant will instruct a solicitor to prepare a suitable legal agreement at the appropriate time.

Cycle parking

Officers comment: *"London Plan Policy T5 sets out cycle parking standards for C3 and C4 dwellings. Whilst it is noted that the development is a Sui Generis rather than a C3 or C4 development, the Council would apply the cycle parking requirements set out in policy T5 which states that 1 space per unit should be provided for 1b1p units."*

Officers comment: The proposal appears to provide 6 x Sheffield stands at the rear which would provide space for parking 12 bikes. This would be an under-provision for 27 units and would need to be amended. Cycle storage should be secure and should comply with the standards set out within the London Cycle Design Standards.

Response: 24 semi vertical bike racks are being proposed in the revised scheme located at the back of the property with main access at the left-hand side through a secured gate.

Bin storage

Officers comment (1): *“Refuse storage should be designed in from the outset in accordance with Local Plan policy DM13. Refuse storage is shown at the rear comprising 12 individual wheelie bins. It would be more sensible to provide communal bins.”*

Officers comment (2): *“Bin storage must be provided in accordance with guidance set out in the Council’s ‘Waste and Recycling in Planning Policy Document’ (2015). This outlines, amongst other things, that a bin collection point should be no more than 20m from the collection vehicle to enable operatives to collect, and that residents should not be required to walk more than 30m to deposit their waste.”*

Response: Bin storage area has been redesigned in the amended scheme to provide a larger communal bins and have been split into general waste, recycling bins (comingled recycling, paper/card recycling) and a food recycling bin. Access for operatives is within 20 meters and located in the same area as refuse bins for 160 Gillett Road.

Neighbouring Amenity

Officers comment: The proposal would have no material change to impacts on neighbouring occupiers in comparison to the existing/previous situation in relation to privacy, outlook, daylight, or sunlight. However, noise and disturbance are also material planning considerations and any development on this site must avoid harm to neighbour amenity in this regard. Please address in any future submission, with reference to Local Plan policy DM10.6.

Response: the scheme does not have an external amenity space for residence therefore noise disturbance is not deemed to increase giving the existing number of residences at the property. The back and side area are fenced preventing any outlook to neighbouring areas.

Trees, Landscaping and Biodiversity

Officers comment: There are no trees or soft landscaping on the site currently. Please provide details of any proposed trees, landscaping and biodiversity features in accordance with Local Plan policies DM28 and DM10.8 and London Plan policy G7 which, amongst other things, require hard and soft landscaping to be incorporated within proposals. In addition, Local Plan policy DM27 and London Plan G6 state that development proposals

should have no adverse impact on biodiversity and proposals should aim to secure net biodiversity gain.

Response: the site is very limited in size and doesn't allow for trees to be planted. The site requires hard landscaping for access to bin and cycle storage at the back, which is being proposed in permeable paving. Green planter box is being proposed on the east side of the property.

Carbon Dioxide Emissions

Officers comment: The proposal would need to comply with the Energy Hierarchy of the London Plan (2021) and, in accordance with Local Plan Policy SP6, would need to achieve a reduction in carbon dioxide emission of 19% beyond the Building Regulations Part L (2013) and achieve a minimum water efficiency standard of 110 litres/person/day. Whilst these matters may be secured by condition it is important that any future application includes measures in order to achieve these requirements (for example if external photovoltaic panels are proposed, these should be included on the plans).

Response: the above measures can be secured by way of an appropriately worded planning condition.

Community Infrastructure Levy

Officers comment: *"The proposal would be subject to Mayoral CIL and Croydon CIL. The CIL rates for 2023 (including indexation) are: Croydon CIL £186.02 per sqm and Mayors CIL £26.89 per sqm. This would be payable upon commencement."*

Response: the relevant CIL form has been submitted with this application.

6.0 Conclusion

7.1 The proposal has been amended in response to the advice received at the pre-application stage. The number of units has been reduced and a communal space, staff area and shared kitchens have been provided.

The refuse storage has been redesigned and cycle stands increased.

7.2 It is therefore submitted that the scheme should be looked upon favourably and approved accordingly

