

# TRANSPORT TECHNICAL NOTE

PROJECT	P2401.1 33 BRIGHTON ROAD, SOUTH CROYDON, CR2 6EB
DATE	FEBRUARY 2024
REASON	FULL PLANNING
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## 1. INTRODUCTION

KRONEN has been instructed to prepare this Technical Note to support proposals for 33 Brighton Road, South Croydon, CR2 6EB (in the London Borough of Croydon).

## 2. SITE INFORMATION

The proposals site is 33 Brighton Road, South Croydon, CR2 6EB.

Rohacs Architects are the project architects. Refer to Rohacs Architects accompanying site plans showing the site boundary and building.

The site is a building within "The Pavilions" collection of commercial buildings which is 31 to 39 Brighton Road / Units 1 to 6.

The application / proposal relates to 33 Brighton Road / Unit 3.

The building provides 3 × floors of commercial floor space each providing approximately 120sqm of space (ground, first and second floors).

The Pavilions has a vehicle access leading to a rear parking courtyard.

33 Brighton Road / Unit 3 is allocated 6 × parking spaces in the courtyard.

## 3. PLANNING HISTORY

The site was recently subject of the following prior approval application:

Application "23/01224/GPDO" for the "Change of use from office (Use Class E) to residential (Use Class C3) to provide 6no. flats under Schedule 2, Part 3, Class MA of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) and associated works".

KRONEN did not work on this application.

The application sought approval for 6 × flats at ground, first and second floors. The schedule of accommodation was 4 × 1-bedroom and 2 × 2-bedroom flats.

The application included 8 × parking spaces including the 6 × parking spaces in the rear courtyard and 2 × spaces parallel to Brighton Road at the front the site (although there is no formal dropped kerb for these).

The application did not include cycle parking or refuse stores.

The application was refused in June 2023. Reasons for refusal 3 and 6 related to transport and were:

“3 The proposal fails to demonstrate that adequate cycle and refuse storage would be provided and has not demonstrated that there is sufficient space to meet such a requirement. As such, there is insufficient certainty that this could be achieved and the proposal therefore fails to promote sustainable modes of transport and provide acceptable cycle parking and refuse storage arrangements, contrary to policies DM10, DM13, DM29 and DM30 of the Croydon Local Plan (2018), Croydon’s Waste and Recycling in Planning Policy Document (2018), policy T5 of the London Plan (2021) and Paragraph MA.2 (2) (a) of Class M, Part 3, Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (As Amended).”

“6 In the absence of a legal agreement, the application does not offer a means to prevent increased car use in the Controlled Parking Zone. The proposal would thereby be contrary to condition MA.2 (2) (a) of Class MA of Part 3 of Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015 (As Amended); policies T1, T2, T4, and T6 of the London Plan (2021); policies DM29 and DM30 of the Croydon Local Plan (2018).”

With regards to these reasons for refusal the officer’s report stated:

“a) transport impacts of the development, particularly to ensure safe site access;

5.20 The site is located in an area with a PTAL of 6a, which is excellent. The site is within the West Permit Zone CPZ. Brighton Road has restricted parking, with no waiting nor loading, and parking is on a 2-hour maximum basis, with pay on street available within certain times. In respect of trip generation given the scale of the proposed development and its well-connected location, the proposal is not expected to have a material impact upon the surrounding transport network, above the current levels.

5.21 LP policy T6.1 states that all areas with a PTAL of 6 should be car free. The development site that the application site is situated within, has parking to the rear. The proposed plans demonstrate that there would be 2no. spaces in the front of the property, and 6no. allocated spaces in various locations to the rear. The parking to the front is informal, as there does not appear to be any parking perimeters painted on the ground, nor is there a dropped kerb. The spaces to the front of the site would have a width of 2.3m, which is insufficient as this should be at least 2.4m, however, more space should be given (3m) as it is alongside a hard boundary (the building). While these spaces are shown on the existing plan, this would not be sufficient to permit this continued use. Additionally, space 4 would be unusable given that the external stair is proposed in this location. Therefore, the total provision of car parking spaces (removing the aforementioned 3no. spaces) would be 5no. spaces for the proposal. Given that the allocated parking spaces are within private land and would be controlled by the landowner, and also the spaces would not be created specifically

for the development, officers do not raise an objection to the provided spaces. However, given that the site is within a CPZ, had prior approval been granted, a section 106 agreement would be required to restrict future occupiers from gaining parking permits; the absence of this agreement will form a reason for refusal. It should also be noted that the car parking spaces are outside of the red edging of the boundary line, therefore, are also outside of the control of the LPA.

5.22 The proposal does not demonstrate any cycle parking spaces. Given the limited space within the site to provide this, officers cannot be comfortable that this could be dealt with by way of a condition, therefore, this must form a reason for refusal. Additionally, waste/recycling bins and associated storage, and bulky waste storage have not been demonstrated on the plans. Similarly to the cycle parking, the lack of information on this aspect would need to form a reason for refusal.

5.23 In conclusion, the proposal is not acceptable in terms of transport impacts, as there is no provision for cycle parking and waste/recycling provision, which could impact on transport matters if not adequately provided. Additionally, the application would not be secured with a S106 agreement with regards to parking permit restrictions. These aspects will form reasons for refusal.

#### 4. SITE LOCATION AND PUBLIC TRANSPORT ACCESSIBILITY

The site is within walking distance of 2 × locally designated local centres; approximately 100m to the north and 750m walk distance to the south.

The site has good access to buses on Brighton Road (Upland Road stops with 60, 166, 312, 407, 466 services) and Selsdon Road (Croham Road and Ruskin Parade stops with 403, 412, 455 services) and has access to Southern's rail services from South Croydon Railway Station.

Public transport accessibility in London is often quantified and measured using TfL's "Public Transport Accessibility Level" ("PTAL") model. TfL's online GIS-based PTAL tool was used to research the site's PTAL score. The PTAL tool calculated the site to have a PTAL score of 5. This PTAL score indicates a "Very Good" level of public transport service availability ([Online] < <https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcats/webcats> > [Accessed January 2024]).

#### 5. HIGHWAYS AND PARKING

The site / rear courtyard is accessed from Brighton Road.

Brighton Road the A235 is a classified A-road / distributor road.

The site and surrounding roads are within Croydon Council's Controlled Parking Zone "W" which restricts parking Mondays to Saturdays 9am to 5pm.

#### 6. PROPOSAL

A revised proposal has been developed for resubmission.

The application / proposal relates to the building's 2 × upper floors (first and second floor). The existing commercial floor space at ground floor is retained.

The revised proposal seeks approval for 4 × flats at first and second floors. The schedule of accommodation is 2 × 1-bedroom and 2 × 2-bedroom flats.

As discussed The Pavilions has a vehicle access leading to a rear parking courtyard. At present 33 Brighton Road / Unit 3 is allocated 6 × parking spaces in the courtyard.

The proposal retains 3 × parking spaces in the courtyard. The other 3 × spaces will be converted to a refuse store and a cycle store.

## 7. ASSESSMENT - VEHICLE PARKING

Refused application “23/01224/GPDO” sought approval for 6 × flats; 4 × 1-bedroom and 2 × 2-bedroom flats.

The scheme included 8 × parking spaces including the 6 × parking spaces in the rear courtyard and 2 × spaces parallel to Brighton Road at the front the site (although there is no formal dropped kerb for these).

The officer’s report states:

“5.21 LP policy T6.1 states that all areas with a PTAL of 6 should be car free. The development site that the application site is situated within, has parking to the rear. The proposed plans demonstrate that there would be 2no. spaces in the front of the property, and 6no. allocated spaces in various locations to the rear. The parking to the front is informal, as there does not appear to be any parking perimeters painted on the ground, nor is there a dropped kerb. The spaces to the front of the site would have a width of 2.3m, which is insufficient as this should be at least 2.4m, however, more space should be given (3m) as it is alongside a hard boundary (the building). While these spaces are shown on the existing plan, this would not be sufficient to permit this continued use. Additionally, space 4 would be unusable given that the external stair is proposed in this location. Therefore, the total provision of car parking spaces (removing the aforementioned 3no. spaces) would be 5no. spaces for the proposal. Given that the allocated parking spaces are within private land and would be controlled by the landowner, and also the spaces would not be created specifically for the development, officers do not raise an objection to the provided spaces. However, given that the site is within a CPZ, had prior approval been granted, a section 106 agreement would be required to restrict future occupiers from gaining parking permits; the absence of this agreement will form a reason for refusal. It should also be noted that the car parking spaces are outside of the red edging of the boundary line, therefore, are also outside of the control of the LPA.”

The current proposal includes:

- Retained existing commercial floor space at ground floor approximately 120sqm.
- Proposed 4 × flats at first and second floors with a schedule of accommodation is 2 × 1-bedroom and 2 × 2-bedroom flats.
- Proposed retained 3 × parking spaces in the courtyard.

With regards to the officer’s report for the refused scheme, the revised proposal seeks to address a number of objections by:

- The 2 × spaces parallel to Brighton Road at the front the site have been removed from plans.
- The proposed external stair case has been removed (and the impacted parking space has been converted to refuse storage area).

- A legal agreement / obligation restricting future occupiers from gaining parking permits will be submitted with this application.

With regards to vehicle parking policy, adopted local parking policy is set out in Policy DM30 Car and Cycle Parking in New Development of "Croydon Local Plan 2018" (Croydon Council, 2018).

This policy refers to standards set out in Table 10.1 Car Parking in New Development (p.190).

With regards to minor non-residential and residential development Table 10.1 states car parking should be in line with Table 6.2 of the "London Plan" (Greater London Authority, 2016).

The London Plan has since been updated.

Current "London Plan" (GLA, 2021) car parking policies are Policy T6 Car parking, T6.2 Office Parking and T6.1 Residential Parking.

Policy T6 is the overarching policy. Policy T6 encourage car free and "car-lite" development.

With regards to the existing retained office use at ground floor, Policy T6.2 Office Parking refers to Table 10.4.

Table 10.4 provides an Outer London standard of up to 1 × space per 100sqm.

With regards to the proposed new residential flats, Policy T6.1 Residential Parking refers to Table 10.3.

Table 10.3 provides a states all dwellings in PTAL 5 to 6 locations should be car free.

Given that the existing site has 6 × parking spaces, the proposal seeks conversion / change of use and is not new-build and that parking is being reduced to 3 × spaces, the proposal including low-level parking is not considered objectionable. This rationale is consistent with the assessment in the recent refused scheme officer's report.

## 8. ASSESSMENT - CYCLE PARKING

As shown on proposed plans the proposal includes 1 × cycle store for the proposed new flats and this could provide 6 × long-stay cycle parking spaces.

Cycle parking policy and standards are Policy DM30 Car and Cycle Parking in New Development of "Croydon Local Plan 2018" (Croydon Council, 2018) and Policy T5 Cycling of London Plan (GLA, 2016).

Policy DM30 refers to the London Plan.

London Plan (GLA, 2021) Policy T5 refers to Table 10.2.

Table 10.2 standards for residential uses prescribes the following:

Long-stay cycle parking spaces (e.g. for residents or employees)

- 1 space per studio or 1 person 1 bedroom dwelling
- 1.5 spaces per 2 person 1 bedroom dwelling
- 2 spaces per all other dwellings

Short-stay cycle parking spaces (e.g. for visitors or customers)

- 5 to 40 dwellings: 2 spaces

- Thereafter: 1 space per 40 dwellings

The proposed store would provide of a total of 6 × long-stay cycle parking spaces.

The proposal provides cycle parking in accordance with the London Plan; 1 × space per 1-bedroom-1-person flat and 2 × spaces per 2-bedroom flat with no requirement / provision for short-stay visitors.

The proposal provides cycle parking in accordance with London Plan minimum standards and is therefore considered acceptable.

With regards to cycle parking design the long-stay cycle parking store:

- Sheffield or M-Profile stands will be provided in the store.
- The store is sheltered from weather.
- Store door will provide a good opening width.
- For security the store will provide opening access controls (key, fob, swipe card).
- The route to the store is step-free.
- Stand dimensions and spacings exceed / comply with LTN 1/20 (“Cycle Infrastructure Design Local Transport Note 1/20”, DfT, 2020) and LCDS (“London Cycling Design Standards”, TfL, 2014): bays are 3.0m in length, stands are spaced 1.2m apart and there is a gap of 0.7m for store walls.

Refer to enclosed Figure 1 showing store dimensions.

The store could accommodate larger cycles / non-standard cycles (e.g. Cargo cycles (up to 2.30m long × 0.87m wide) or cycles with trailers (up to 2.50m long × 0.85m wide)).

It is considered that cycle parking is “pleasant, sufficient and convenient” per Principle 9 of LTN 1/20 and “fit-for purpose”, “secure” and “well-located” per cycle parking principles of LCDS; cycle parking design is therefore considered acceptable.

It is considered cycle parking provision and design is acceptable and could be secured by planning condition.

## 9. ASSESSMENT – REFUSE SERVICING

The proposal includes a refuse store within the rear courtyard within 20m from the public highway.

Refer to enclosed Figure 2.

The store shows capacity for 3 × large 1.3m × 1.0m bins.

With regards to refuse access it is considered the layout is acceptable. It is also considered refuse arrangements could be secured by planning condition.

Other routine servicing could take place from the courtyard itself; it is assumed that this currently happens with neighbouring Units.

## 10. ASSESSMENT - CONCLUSIONS

Based on the above the proposal's vehicle parking, cycle parking and servicing arrangements are considered acceptable.

With regards to transport impacts Paragraph 115 of the “National Planning Policy Framework” (DLUHC, 2023) includes guidance of only preventing or refusing development on transport grounds where “there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe”. The proposal is not considered to have a severe impact in this context and is therefore considered not objectionable in a planning context.

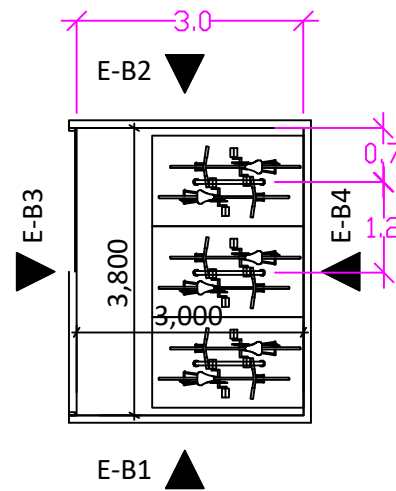
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# ENCLOSURES



NO "ACCESS AISLE WIDTH"  
CONSTRAINTS AS ADJOINS OPEN  
REAR COURTYARD.



SCALE 1:100 © A4

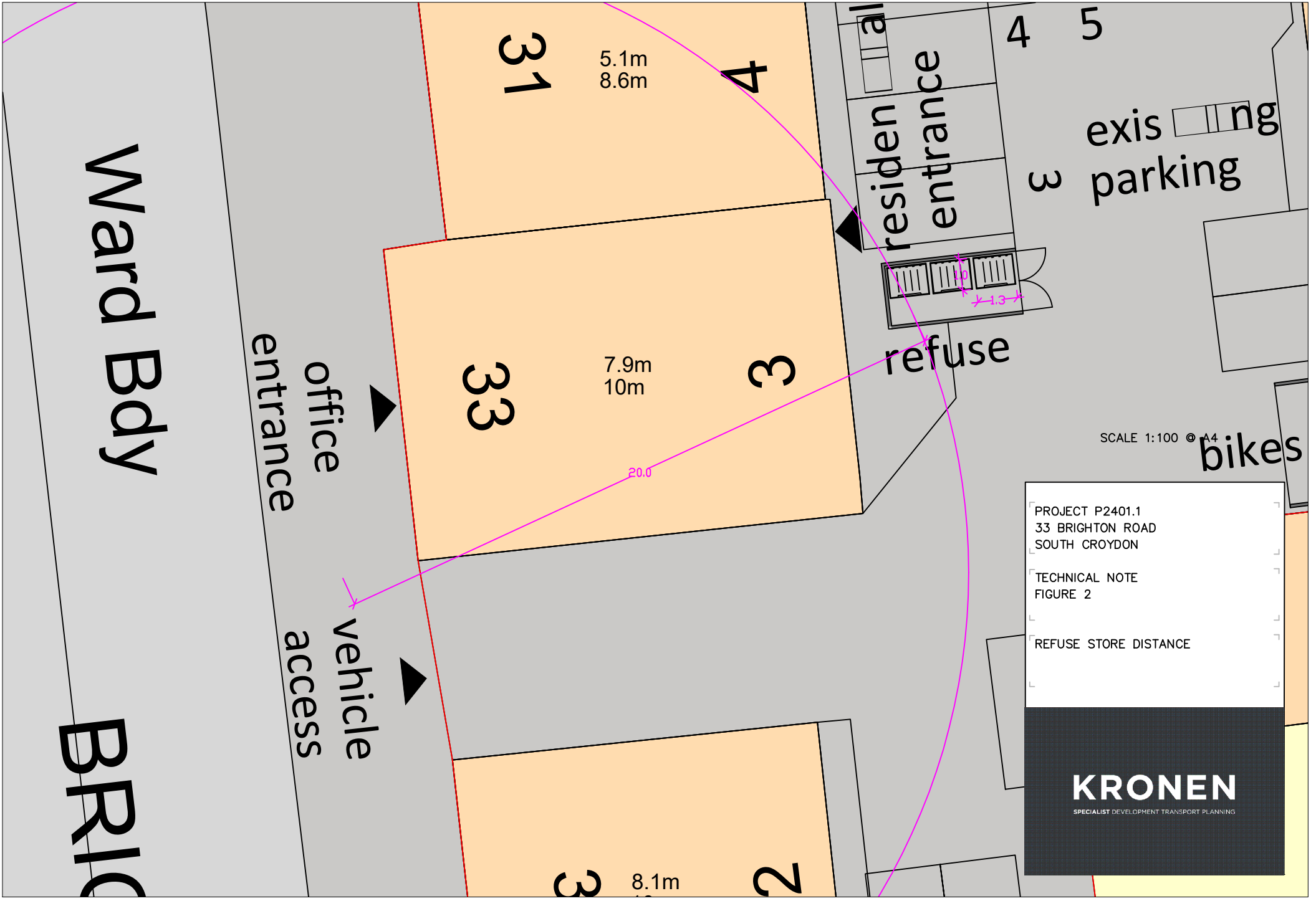
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TECHNICAL NOTE  
FIGURE 1

CYCLE STORE DIMENSIONS

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SPECIALIST DEVELOPMENT TRANSPORT PLANNING



Ward Bdy

BRIC

31

5.1m  
8.6m

4

residential  
entrance

4 5

existing  
parking

33

7.9m  
10m

3

refuse

entrance  
office

vehicle  
access

20.0

SCALE 1:100 © A4

bikes

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TECHNICAL NOTE  
FIGURE 2

REFUSE STORE DISTANCE

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SPECIALIST DEVELOPMENT TRANSPORT PLANNING