



EXTENDING — MY HOME —

Planning Statement

1a Brighton Road
Croydon
CR2 6EA

11th March 2024



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Introduction

1. Introduction

- 1.1. This statement is made to support the application for outline planning consent for the development of a new 5 storey block at 1a Brighton Road
- 1.2. The application submitted with all matters reserved except for scale and layout.

The Site

2. The Site

- 2.1. The subject site located on the eastern side of Brighton Road. The site's frontage to Brighton Road is approximately 38m.
- 2.2. To the north of the site at the junction of Brighton Road and South End is the former Swan and Sugarloaf Public House, the ground floor of which is now occupied by a Tesco Express Store. This property is a locally Listed building. The land adjoining the former Public House is owned by the applicant
- 2.3. There are no listed buildings in the immediate vicinity, the nearest is the Church of St Peter some way to the east.
- 2.4. The site has a PTAL Rating of 6a and is within 0.3 miles of South Croydon Station, with a number of bus services stopping immediately outside of the site. The site is within the Brighton Road / Selsdon Road Local Centre, and Archaeological Priority Area (APA) and a Local Heritage Area. The site is also split between Flood Zone 2 and Flood Zone 3.

Proposed Development

3. Proposed Development

3.1. This application seeks outline planning consent for the development of a 5-storey mixed-use block. The proposed block would comprise of 25 self contained residential flats and up to 2 commercial units.

3.2. Footprint & Floor Plates

3.2.1. The footprint of ground floor of the proposed building will be identical to that proposed under application 22/04995/OUT which was appealed under APP/L5240/W/23/3326319. The footprint of the building proposed under 22/04995/OUT was found to be acceptable by the planning inspector and therefore the footprint of the ground floor of the building proposed in this application should be acceptable.

3.2.2. As a proactive response to flood risk assessments and in accordance with the NPPF's sequential approach to flood risk, the internal ground floor level is elevated by 30cm from the natural ground level.

3.2.3. The proposed floor plan for the 1st, 2nd, 3rd and 4th floors of the building proposed in this application is identical to that in 22/04995/OUT which was found to be acceptable by the planning inspector in APP/L5240/W/23/3326319. The only difference is that on the 1st – 3rd floors of this application, the floor is set back very slightly on the south east corner. The floor plans below show the area of massing edged in blue lines that was proposed in 22/04995/OUT and which has been replaced with an open terrace area in this application. The first and second floor plan is shown on left and the 3rd floor is on the right:



3.2.4. The 4th floor is identical to that proposed in 22/04995/OUT

3.3. Standard of Residential Accommodation

- 3.3.1. Internal floor area: All the flats comply with the national minimum standards for residential dwellings. All 1b1p flats have a minimum floor area of 37m². All 1b 2p flats have a minimum floor area of 50m². All 2b 3p flats have a minimum floor area of 61m². All 3b4p flats have a minimum floor area of 74m². All 3b 5p flats will have a minimum floor area of 86m². All 4b 5p flats will have a minimum floor area of 90m²
- 3.3.2. Room sizes: All double bedrooms have a minimum floor area of at least 11.5m² with a minimum width of 2.75m. All single bedrooms have a minimum floor area of 7.5m² and a minimum width of 2.15m. All 2 person flats have 23m² of living space; 3 person units have 25m² 23m² of living space; 4 person units have 27m² 23m² of living space; 5 person units have 29m² of living space.
- 3.3.3. Light: All rooms within the dwellings receive the minimum required levels of daylight and all dwellings benefit from at least one room with a window within 90 degrees of due south that received at least 90 minutes of sunlight on 21st March.
- 3.3.4. Layout: The layout is functional and not convoluted. The layout provides for straightforward and high quality functional living arrangements.

3.4. Character of the Area

- 3.4.1. The only material consideration in respect of character of the area, the paramount pertains to the scale of the development. Matters beyond this, given their reserved nature, remain extraneous to the current phase of the outline planning process.
- 3.4.2. It is acknowledged that the proposed development in respect of its height, would be higher than the existing buildings within its immediate contextual surroundings. However, considering the imminent two-storey extension at 5 Brighton Road, the consequent street scene that would manifest if this application is granted would broadly appear as shown in the illustration below:



- 3.4.3. It is a material consideration that the site at 3 Brighton Road had consent for a new four storey building granted in 2019. Whilst that consent has now lapsed, it is reasonable to expect that if such an application was submitted again, consent for a new four storey building would once again be granted.
- 3.4.4. Logically extrapolating, given that 5 Brighton Road now has consent for a five storey building, it is conceivable that 3 Brighton Road would in the future pursue a development of a similar height, culminating in a street scene as depicted here:



- 3.4.5. Urban tapestries evolve over time, and it is inevitable that the interstitial street scene between Selsdon Road and Wandle Road is poised for architectural evolution in the foreseeable future. Wandle Apartments on the corner of Brighton Road and Wandle Road now also qualifies for an additional floor under policy and it is once again inevitable that such a development will occur at some point in the near future.
- 3.4.6. It is therefore the applicants position that the scale of the proposed 5 storey building will not harm the character of the area, and, following the appeal allowing a 5 storey building at 5 Brighton Road, this application would align with the evolving character of the area.
- 3.4.7. Application 22/04995/OUT was refused because of the proximity of the proposed development to the Swan and Sugarloaf. The planning inspector did not support this reason for refusal in APP/L5240/W/23/3326319 and therefore the proximity of the building proposed in this application to the Swan & Sugarloaf should be acceptable as it mimics the front elevation of the proposal in 22/04995/OUT.
- 3.4.8. Application 22/04995/OUT was also refused because of the perceived impact from the east (rear towards Selsdon Road) and north (towards Brighton Road). Once again the planning inspector did not support this ground for refusal when determining appeal APP/L5240/W/23/3326319. The scale of the building proposed in this application should therefore be acceptable because the section of the building facing open section of airspace in Selsdon Road has been reduced and is therefore smaller than that found to be acceptable by the planning inspector. Further the elevation fronting Brighton Road is broadly the same as that which the inspector found acceptable in APP/L5240/W/23/3326319.

3.4.9. In summary, the character of the area is evolving and 5 Brighton Road already has consent secured on appeal for a 5 storey building. The owners or future owners of 3 Brighton Road and 1 Wandle Road will inevitably apply for 5 storey buildings given that there is now a precedent established at 5 Brighton Road. This proposal will therefore align with the evolving character of the area.

3.5. Urban Greening

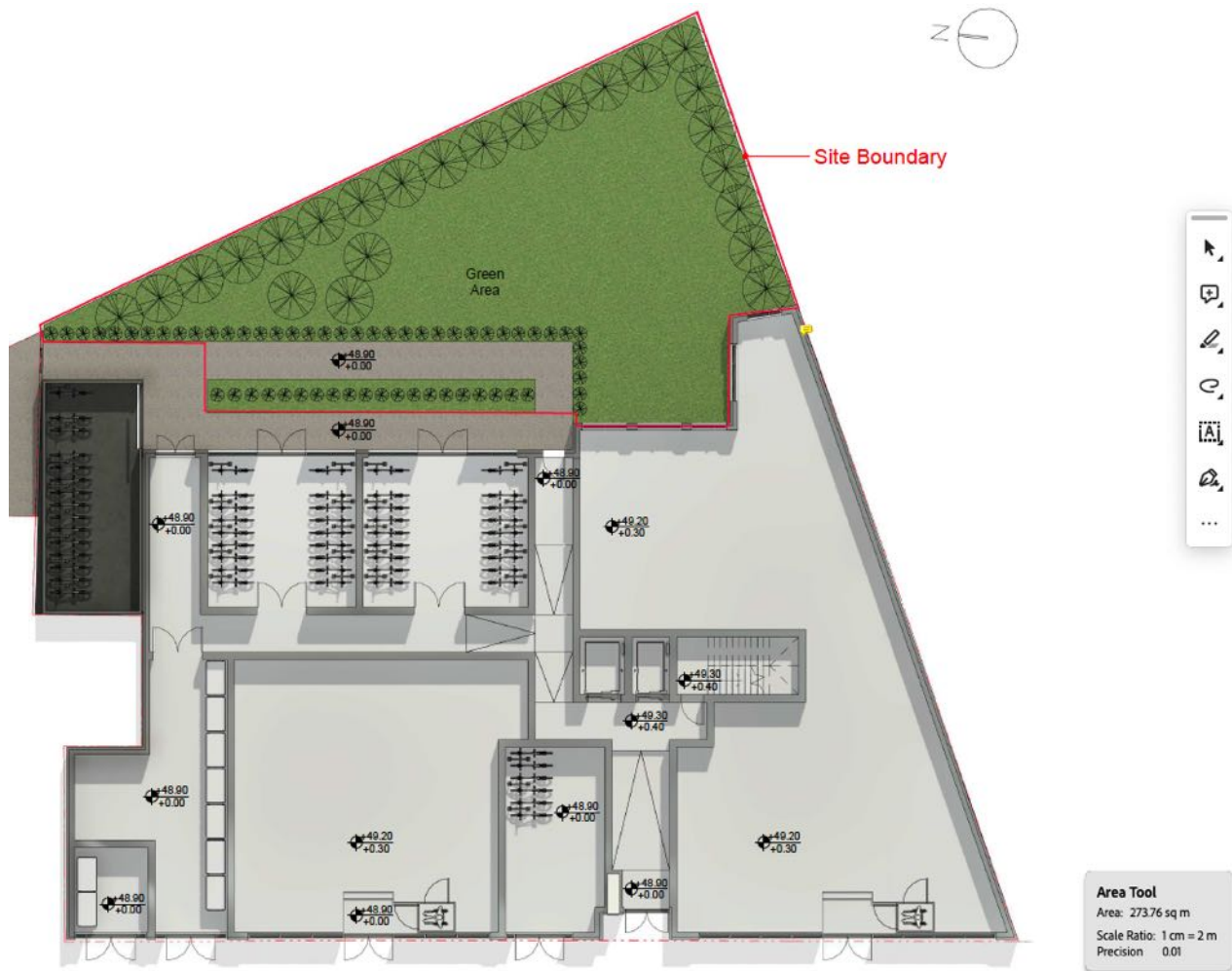
3.5.1. While landscaping falls under reserved matters, it's pivotal to articulate the prospective interventions concerning urban greening, as it constitutes a salient facet of sustainable urban development, particularly within the context of the London Plan 2021.

3.5.2. Currently, the site's classification as brownfield highlight its deficiency in urban greening. This characterisation accentuates the inherent opportunity: any form of developmental intervention will tangibly amplify the site's green character.

3.5.3. Envisioning the architectural potential, the introduction of biodiverse green roofs on top of the flat roof surfaces offers a dual advantage. Firstly, it fosters an ecosystem, bolstering local biodiversity, aligned with the NPPF's aspirations. Secondly, it serves as a visual and environmental cushion, enhancing the building's thermal performance and aesthetic appeal. Coupled with the substantial provision of a 250m² communal garden, the scheme stands poised to not only augment urban greening quantitatively but also qualitatively, thereby surpassing the Urban Greening Factor (UGF) benchmarks set forth in the London Plan 2021 and Croydon Plan 2018.

3.5.4. Issues of Urban Greening are not however a material consideration at this stage and must not form part of the decision making process. Urban Greening can be dealt with decisively at the reserved matters stage. However, to demonstrate that the proposal can not only meet but exceed the 0.4 UGF target, the following analysis is provided.

3.5.5. Semi natural vegetation (species rich grassland): The site has the ability to provide 273m² of this category of greening on the ground floor as shown in the following illustration and which alone results in a UGF score of 0.27:



3.5.6. Intensive green roof: In addition, the proposed building has 597m² of flat roof which excludes any section of roof designated for private amenity space. The flat roof sections would provide a UGF score of 0.48 on their own if all were covered with intensive green roof.

3.5.7. Extensive green roof: The scheme could use an extensive green roof instead of an intensive green roof which would provide a UGF score of 0.42

3.5.8. Extensive green roof of sedum mat: Finally, the scheme could use a sedum mat green roof which would provide a UGF score of 0.18.

3.5.9. The site further benefits from tall retaining walls along the eastern and southern boundaries. On the eastern boundary the retaining wall is 29 wide by 5m high and on the southern boundary the retaining walls are 18.5m wide by 4m high. This provides 219m² for a green wall system. This on its own would achieve a UGF score of 0.13.

3.5.10. There is also potential to plant trees in a section of the amenity space. Planting 85m² of trees as shown on the indicative landscape plan would achieve a UGF score of 0.068.

3.5.11. A likely combination of the following will be implemented resulting in a UGF score of 0.75:

Urban Greening Factor Calculator			
Surface Cover Type	Factor	Area (m ²)	Contribution
Semi-natural vegetation (e.g. trees, woodland, species-rich grassland) maintained or established on site.	1	100	100
Wetland or open water (semi-natural; not chlorinated) maintained or established on site.	1		0
Intensive green roof or vegetation over structure. Substrate minimum settled depth of 150mm.	0.8	250	200
Standard trees planted in connected tree pits with a minimum soil volume equivalent to at least two thirds of the projected canopy area of the mature tree.	0.8	85	68
Extensive green roof with substrate of minimum settled depth of 80mm (or 60mm beneath vegetation blanket) – meets the requirements of GRO Code 2014.	0.7	150	105
Flower-rich perennial planting.	0.7	16.5	11.55
Rain gardens and other vegetated sustainable drainage elements.	0.7		0
Hedges (line of mature shrubs one or two shrubs wide).	0.6		0
Standard trees planted in pits with soil volumes less than two thirds of the projected canopy area of the mature tree.	0.6		0
Green wall –modular system or climbers rooted in soil.	0.6	219	131.4
Groundcover planting.	0.5		0
Amenity grassland (species-poor, regularly mown lawn).	0.4		0
Extensive green roof of sedum mat or other lightweight systems that do not meet GRO Code 2014.	0.3	197	59.1
Water features (chlorinated) or unplanted detention basins.	0.2		0
Permeable paving.	0.1		0
Sealed surfaces (e.g. concrete, asphalt, waterproofing, stone).	0		0
Total contribution			675.05
Total site area (m²)			997
Urban Greening Factor			0.677081244

3.5.12. It is therefore clear that the development could meet and exceed the UGF target score and a condition can be imposed requiring this to be demonstrated at the reserved matters stage.

Planning Policy

4. Planning Policy

Planning Policy Framework

4.1. Planning Policy Framework

4.1.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 states any determination should be made in accordance with the Development Plan unless material considerations indicate otherwise. The proposal has been considered within the context of National, Regional and Local Planning Policy, and the key policies are summarised below.

4.1.2. The statutory development plan, as is relevant to this proposal, is currently made up of the London Plan (2021) and the Croydon Local Plan 2018.

4.1.3. Other material considerations are the National Planning Policy Framework (NPPF) and a number of Supplementary Planning Policy Guidance and Documents prepared by the GLA and the Council, as well as emerging policy documents. Page 3 of 14

National Planning Policy Framework (NPPF)

4.2. National Planning Policy Framework (NPPF)

4.2.1. The NPPF (2021) sets out the Government's planning policies for England and how they should be applied and is an important material consideration. It should be taken account of in the preparation of the development plan and in making decisions on planning applications.

4.2.2. Paragraph 8 outlines that there are three overarching objectives to achieving sustainable development. They are interdependent and need to be pursued in mutually supportive ways so that opportunities can be taken to secure net gains across each of the different objectives. The three objectives are economic, social and environmental. Economically, the objective is to build a strong, responsive and competitive economy.

4.2.3. These objectives are:

- Economic — to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved

productivity; and by identifying and coordinating the provision of infrastructure;

- Social — to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- Environmental — to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

4.2.4. The NPPF states that "so that sustainable development is pursued in a positive way, at the heart of the framework is a presumption in favour of sustainable development" (Paragraph 10). Paragraph 11 identifies that in making decisions this means:

- Approving development proposals that accord with an up-to-date development plan without delay; or;
- Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
 1. The application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 2. Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

4.2.5. Delivering a sufficient supply of homes 6.8 Paragraph 60 identifies that it is important for a significant amount and variety of land to come forward where it is needed. Paragraph 69 further states that small and medium sized sites can make an important contribution to meeting the housing requirements of an area, and can often be built out relatively quickly. As part of this LPAs should support the development of windfall sites, giving great weight to the benefits of using suitable sites within existing settlements for homes.

4.2.6. Promoting sustainable transport 6.9 In terms of transport, development proposals should consider their impact and promote walking, cycling and public transport. Safe and secure access for all users' needs to be achieved. Any significant impacts should be mitigated in a cost-effective way to an acceptable degree and development should

only be prevented or refused if there would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe (paragraph 111).

4.2.7. Making effective use of land 6.10 Paragraph 119 requires that planning decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment. This should include promoting development of under-utilised land and buildings, especially if it would help meet identified housing needs.

4.2.8. Achieving well-designed places 6.11 In terms of design paragraph 126 identifies that the creation of high quality buildings and places is fundamental to what the planning system should achieve. It is also a key aspect of sustainable development and creates better places in which to live and work. Developments should (inter alia) be visually attractive, with good architecture, layout and landscaping, and be sympathetic to the local character (paragraph 130).

London Plan 2021

4.3. London Plan 2021

4.3.1. The London Plan 2021 is the Spatial Development Strategy for Greater London which was formally published by the Mayor on 2nd March 2021. It sets out a framework for how London will develop over the next 20-25 years and the Mayor's vision for Good Growth. The Plan is part of the statutory development plan for London, meaning that the policies in the Plan should inform decisions on planning applications across the capital.

4.3.2. Strategic planning in London is the shared responsibility of the Mayor of London, Corporation of the City of London, and 32 London Boroughs. Boroughs' local development documents must be 'in general conformity' with the London Plan, which must be taken into account when planning decisions are taken in any part of London unless there are planning reasons why it should not.

4.3.3. The document brings together the geographical and locational aspects of the Mayor's other strategies, to ensure consistency with those strategies, including those dealing with: Transport, Environment, Economic development, Housing, Culture, Health and health inequalities.

4.3.4. Of note are the following policies:

- Policy GG1: Building strong and inclusive communities. Good growth is inclusive growth. To build on the city's tradition of openness, diversity and equality, and help deliver strong and inclusive communities.
- Policy GG2: Making the best use of land. To create successful sustainable mixed-use places that make the best use of land, those involved in planning and development must prioritise sites which are well connected and proactively explore the potential to intensify the use of land to support additional homes, promote high density development, particularly in locations which are well-connected.
- Policy GG4: Delivery the homes Londoners need. To create a housing market that works better for all Londoners, those involve in planning and development must ensure that more homes are delivered, created mixed and inclusive communities with good quality homes that meet high standards of design.
- Policy D1: London's form, character, and capacity for growth - Part A of this policy sets out the requirements for assessing an area's characteristics and Part B sets out the steps for using this information to establish the capacity for growth of different areas and ensure that sites are developed to an optimum capacity that is responsive to the site's context and supporting infrastructure.
- Policy D3: Optimising site capacity through design led approach - Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth, and existing and planned supporting infrastructure capacity. Developments should have regard for their form, layout, experience, quality and character.
- Policy D4: Delivering good design. The design of development proposals should be thoroughly scrutinised by borough planning, urban design, and conservation officers. Design of development proposals should be thoroughly scrutinised by borough planning, urban design, and conservation officers.
- Policy D5: Inclusive design. Development proposals should achieve the highest standards of accessible and inclusive design. They should be designed to be convenient and welcoming with no disabling barriers and should provide independent access without additional undue effort, separation or special treatment.
- Policy D6: Housing quality and standards. Housing development should be of high quality design and provide adequately-sized rooms with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners

without differentiating between tenures. Housing development should maximise the provision of dual aspect units and sufficient daylight and sunlight.

- Policy D12: Fire Safety. In the interests of fire safety and to ensure the safety of all building users all development proposals must achieve the highest standards of fire safety and ensure that there is a robust strategy for evacuation.
- Policy H1: Increasing housing supply. To ensure that ten-year housing targets are achieved, boroughs should allocate an appropriate range and number of sites that are suitable for residential development.
- Policy H2: Small sites. Boroughs should pro-actively support well-designed new homes on small sites in order to significantly increase the contribution of small sites to meeting London's housing needs.
- Policy H5: Delivering affordable housing. All major development of 10 or more units triggers an affordable housing requirement.
- Policy H10: Housing size mix. Schemes should generally consist of a range of unit sizes.
- Policy G1: Green infrastructure. Development proposals should incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network.
- Policy G6: Biodiversity and access to nature. Sites of Importance for Nature Conservation should be protected. Development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.
- Policy G7: Trees and woodlands. Development proposals should ensure that existing trees of value are retained, and additional tree planting should be included in new developments.
- Policy T5: Cycling. Development proposals should help remove barriers to cycling and create a healthy environment in which people choose to cycle. Development should provide cycle parking at least in accordance with the minimum standards.
- Policy T6: Car Parking. Car-free development should be the starting point for all development proposals in places that are well-connected by public transport.

Local Planning Policy

4.4. Local Planning Policy

4.4.1. The 2018 Croydon Local Plan outlines 11 Strategic Objectives. The strategic objectives form the link between the high level spatial vision and the detailed strategy (made up from the thematic policies and the Places of Croydon section). They are the objectives needed to fulfil the spatial vision. The policies and delivery programme within the Croydon Local Plan show how this can be achieved within the plan period. The strategic objectives identified by the Council as being relevant to housing are:

- 4.4.1.1. Aims to establish Croydon as the premier business location in South London and the Gatwick Diamond.
- 4.4.1.2. Seek to foster an environment where existing and new innovative, cultural and creative enterprises can prosper.
- 4.4.1.3. Emphasises the importance of providing choice of housing for people at all stages of life
- 4.4.1.4. Aims to reduce deprivation in all its forms, by (inter alia) renewing housing.
- 4.4.1.5. Highlights the Council's view on ensuring that high quality new development both integrates, respects and enhances the borough's natural environment and built heritage.
- 4.4.1.6. Promotes well designed facilities to meet the diverse needs of the community.
- 4.4.1.7. Identifies the need to conserve and create spaces and buildings that foster safe, healthy and cohesive communities.
- 4.4.1.8. Improvements are sought to accessibility, connectivity, sustainability and ease of movement to, from and within the borough.
- 4.4.1.9. Outlines the importance of ensuring the responsible use of land and natural resources and management of waste to mitigate and adapt to climate change.
- 4.4.1.10. Aims to improve the quality and accessibility of green space and nature, whilst protecting and enhancing biodiversity.
- 4.4.1.11. Aims to tackle flood risk by making space for water and utilising sustainable urban drainage systems.

4.4.2. The relevant policies are detailed below where relevant.

4.4.3. The relevant policies are summarised below:

- 4.4.3.1. Policy SP1 The Places of Croydon: states that the Council will take a positive approach that reflects the presumption in favour of sustainable development within the NPPF. They will seek growth in homes, jobs and services.
- 4.4.3.2. Policy SP2 Homes: seeks a choice of housing for people in socially-balanced and inclusive communities, and a presumption in favour of development of new homes provided applications for residential development meet the requirements of relevant policies. Development should be concentrated in the places with the most capacity whilst respecting local distinctiveness. The COA is intended to provide 10,760 homes and 10,060 on windfall sites. Affordable housing is relevant to this, as is the quality and mix.
- 4.4.3.3. Policy SP4 Urban Design and Local Character: requires high quality development which respects and enhances local character and contributes positively to public realm, landscape and townscape.
- 4.4.3.4. Policy SP6 Environment and Climate Change: requires adaptation to a changing climate by reducing greenhouse gas emissions. Development should make the fullest contribution to minimising carbon dioxide emissions. Flood risk will be managed and sustainable waste management will be considered.
- 4.4.3.5. Policy SP8 Transport and Communication: requires that the pattern of urban growth and the use of land is managed to make the fullest use of public transport. Sustainable travel choices will be provided to reduce the need for travel. Conditions for walking and cycling are to be improved and parking is to be managed.
- 4.4.3.6. Policy DM1 Housing choice for sustainable communities. The Council will permit the redevelopment of residential units where it does not result in the net loss of 3 bedroom homes (as originally built).
- 4.4.3.7. Policy DM10 Design and character: Proposals should be of high quality and whilst seeking to achieve a minimum height of 3 storeys, should respect the development pattern, layout and siting, the scale, height and massing and density and appearance of the surrounding area.
- 4.4.3.8. Policy DM13 Refuse and recycling: The Council will require developments to sensitively integrate refuse and recycling facilities and ensure facilities are visually screened.

- 4.4.3.9. Policy DM27 Protecting and enhancing our biodiversity. To enhance biodiversity across the Borough and improve access to nature development proposal should incorporate biodiversity and enhance local flora and fauna.
- 4.4.3.10. Policy DM28 Trees: The Council will seek to protect and enhance the borough's woodland, trees and hedgerows by ensuring that all development proposals accord with the recommendations of BS5837 2012.
- 4.4.3.11. Policy DM30 Car and cycle parking in new development. To promote sustainable growth in Croydon and reduce the impact of car parking, new development must reduce the impact of car parking in any development located in areas of good public transport accessibility. Car and cycle parking should be provided as set out in the standards in Table 10.1.

Principle of Development

4.5. Principle of the development: Housing need

- 4.5.1. NPPF Chapter 5 'Delivering a sufficient supply of homes' states that housing application should be considered in the context of the presumption in favour of sustainable development. Paragraph 69 of the NPPF states that local planning authorities should "support the development of windfall sites through their policies and decisions — giving great weight to the benefits of using suitable sites within existing settlements for homes". Likewise, the London Plan Policy H1 'Increasing housing supply' seeks to meet housing need by supporting and encourage development to optimise housing delivery.
- 4.5.2. Table 4.1 of the London Plan (which has been adopted as policy more recently) sets 10 year targets for net housing completions (2019/20 - 2028/29) for each local planning authority. Croydon's Housing targets have significantly increased as part of London Plan 2021, with the target increasing to 20,790 dwellings for the period between 2019-2028. Policy H1 of the London Plan recognises the increasing demand for delivery of new homes across London. This is the 9th highest figure out of 32 London Boroughs, therefore it is clear that Croydon will play a primary role in meeting these targets.
- 4.5.3. Policy D3 of London Plan 2021 requires developments to make the best use of land by following a design-led approach that optimises the capacity of the site, with development that is the most appropriate form and land use for the site, with the policy recognising that small sites make a significant contribution towards increasing housing supply within London. This policy position is set out in further detail within policy H2 of London Plan which states that boroughs should pro-actively support well-designed new homes on small sites (below 0.25 hectares in size) through both planning decisions and plan-making in order to amongst other considerations

significantly increase the contribution of small sites to meeting London's housing needs.

- 4.5.4. One of the key aims in the London Plan is to create a housing market that works better for all Londoners. The 2017 London Strategic Housing Market Assessment has identified a significant overall need for housing. London needs 66,000 new homes each year, for at least twenty years in order to satisfy demand. The London Plan has set a ten-year housing target for Harrow of 20,790 dwellings.
- 4.5.5. Redevelopment of the site for 25 residential units ultimately supports the objectives of London Plan Policy H2, providing greater in-principal justification for the proposals. This will help to deliver new homes in line with the small sites target and strategic objectives for London — alongside supporting the aspirations of Croydon Plan 2018 which sets out a delivery target of 32,890 net additional homes between over the plan period. The proposals should therefore be wholly welcomed on this basis. The current use of the site and brownfield nature support the presumption that residential development is supported, alongside recognising that the site is in a sustainable location, with a range of shops, facilities, and transport links in close proximity.
- 4.5.6. The site is previously developed land. Residential redevelopment of the site is supported by London Plan Policies H1 and H2.

Planning Considerations

5. Planning Considerations

Under Section 38(6) of the Planning Compulsory Purchase Act 2004 proposals must be determined in accordance with the development plan unless material consideration indicates otherwise.

Background

5.1. Background

5.1.1. The application site has been subject to a number of planning applications and appeals. Most recently, in January 2024, the planning inspectorate issued a decision a 5 storey scheme for 28 flats. Whilst the appeal was dismissed, it was established that the proposed scale of that application was acceptable.

5.1.2. This application seeks to respond to the planning inspector's decision and address and overcomes the areas of concern.

Principle

5.2. Principle

5.2.1. The proposal would include commercial floorspace at ground floor level. The proposal would provide for 2 replacement commercial units.

5.2.2. It is acknowledged that there would be a loss of commercial floor space under the current proposal. The consented 17 unit scheme provided 404 sqm of floor space. The current scheme proposes 345 sqm of commercial floor space. It is important to note however that the 17 unit scheme was submitted in September 2019. Since the Covid 19 pandemic, buyer habits have changed significantly and there is considerably lower demand for retail units in secondary trading locations such as this one.

5.2.3. Policy DM4.3 requires that outside of the Main and Secondary Retail Frontages (which this is) that mixed use developments will be required to either: demonstrate a specific end user upon completion, or provide a free fitting out service to ensure occupation or an alternative use shown to be possible in the event that it is not occupied after 2 years. The recent approval successfully demonstrated this with a residential layout which the Council were satisfied with. The starting point is that the applicant considers that the space proposed is sufficiently high quality that they would be attractive to potential occupiers. Two smaller units are more likely to be occupied by small businesses than one large unit that could be empty for a long time.

5.2.4. It is acknowledged that the Council previously had concerns about the potential alternative layout for residential. They cited issues including single aspect, outlook and light, noise, privacy and overlooking. The proposed units (if they were ever to exist) would have a degree of setback from the pavement to the rooms themselves with a covered terrace providing separation. This would also provide an aspect which is more than simply single aspect, albeit that it is not quite dual aspect either. They would also not be north facing, which is usually the main concern about single aspect units. Outlook and privacy would certainly not be as good as the floors above, but this is not unusual and residential units at the ground floor level exists across the borough. Noise could be addressed via a condition, and that was the approach taken by the 9 unit and 17 units schemes which were approved. Given that planning permission would be required to change the ground floor to residential, this could be addressed then. Fundamentally, it is submitted that the 2 ground floor commercial units could be converted into 3 policy compliant residential units if necessary in the future.

Residential

5.3. Residential

- 5.3.1. The proposed development will deliver 25 new residential units which is 8 more than would be delivered under 19/04199/FUL
- 5.3.2. Policy SP2 of the Croydon Local Plan (which has been adopted as policy more recently) seeks to deliver a minimum of 32,890 homes between 2016 and 2036, by (inter alia) concentrating development in the places with most capacity to accommodate them and ensuring that land is used efficiently. This equates to 1,644 homes per annum, and so is an increase on the London Plan target.
- 5.3.3. Croydon's Housing targets have significantly increased as part of London Plan 2021, with the target increasing to 20,790 dwellings for the period between 2019-2028. Policy H1 of the London Plan recognises the increasing demand for delivery of new homes across London. This includes a target of 6,410 dwellings on small sites such as the subject site.
- 5.3.4. Policy H1 of The London Plan 2021 has imposed additional new targets for local authorities to deliver housing on windfall sites that are located in a zone with a PTAL greater than 3. This proposal is for a windfall site with a PTAL rating of 6a.
- 5.3.5. Policy H2 of The London Plan 2021 encourages development on small sites as well as intensification of existing residential areas within zones with a PTAL rating of 3-6. The subject site is a small site in an existing residential area with a PTAL rating of 6 and is therefore capable of accommodating intensification.

5.3.6. Therefore, in general terms any proposal which would create residential units has support from planning policy.

Scale and Massing

5.4. Scale and Massing

5.4.1. The Government has attached great importance to the design of the built environment in the NPPF with a presumption in favour of sustainable development. Paragraph 124 of the NPPF states that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities and that the planning system should foster a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being. In October 2019 the Government also published the National Design Guide, helping to address the question of how well-designed places are recognised, by outlining and illustrating the Government's priorities for well-designed places.

5.4.2. London Plan policy D3 states that all development must make the best use of land by following a design-led approach that optimises the capacity of sites. This means ensuring development is of the most appropriate form and land use for the site. Higher density developments are promoted in locations that are well connected to jobs, services, infrastructure, and amenities by public transport, walking and cycling. Development must, among other criteria, enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions. Development must also achieve safe, secure, and inclusive environments, and be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan. Policy D6 requires housing development to be of high-quality design and provide adequately sized rooms.

5.4.3. This proposal has been designed to align exactly with the scale of the building found to be acceptable by the planning inspector in APP/L5240/W/23/3326319 on the same site and therefore should result in no objections on scale and massing.

5.4.4. The proposals are therefore in line with Policy DM1 in terms of ensuring a bulk and massing in keeping with the character and context of the site, delivering much needed housing at a highly suitable brownfield site.

5.4.5. Overall, the proposed development successfully achieves a scale and mass that is sensitive to its context.

Flood Risk

5.5. Flood Risk

- 5.5.1. The development site lies in Environment Agency Flood Zone 2 and 3.
- 5.5.2. A Flood Risk Assessment, a Drainage Assessment, and a Sequential Test and Exception test accompany this application. The reports conclude that the development will be safe for its lifetime against flood risk.
- 5.5.3. A similar approach was accepted previously when planning permission for application 19/04199/FUL was granted. The same conclusion is reached with the updated documents.

Impact on the Character Area

5.6. Impact on the Character of the Area

- 5.6.1. The NPPF emphasises that good design involves responding to local character and history and reflecting the identity of local surroundings and materials, while not discouraging appropriate innovation, and Policy DMP1 requires the scale, type and design of development to complement the locality.
- 5.6.2. SPD1 outlines that development should respond to the local context and respect the existing character of the landscape, streetscape, architectural and historic environment. New development height, massing and façade design should positively respond to the existing context and scale; facilitating good urban design. Building heights should positively respond to existing character. Development massing should limit its visual impact by effectively breaking up facades, creating a varied roofscape and relating positively to existing surroundings. It further outlines that buildings should generally fit in with the existing character of roof types within the street scene and minimise the visual impact from street level.
- 5.6.3. New development height and massing should positively respond to the existing context and scale; facilitating good urban design. Building heights should positively respond to existing character. Development massing should limit its visual impact by effectively breaking up facades, creating a varied roofscape and relating positively to existing surroundings. Buildings should generally fit in with the existing character of roof types within the street scene and minimise the visual impact from street level.
- 5.6.4. Given that the building proposed under reference 19/04199/FUL is identical in terms of scale, massing, design and footprint to the building proposed in this

application, it should be accepted that the development will have no impact on the character of the area.

5.6.5. Overall, the proposal complies with local policy and the London Plan and would appear and would complement the character of the existing property and wider street scene and should therefore considered acceptable.

Housing Mix

5.7. Housing Mix

5.7.1. Policy DM1 of the Local Plan identifies that for developments of 9 or more units within 800m of Croydon Metropolitan Centre, a minimum of 20% of units should have 3 bedrooms or more. 9 of the 22 units now proposed would have 3 or more bedrooms. This represents over 36% and so is significantly above what policy envisages. This is a positive aspect of the development.

5.7.2. The proposed mix of units is as follows:

	1b1p	1b2p	2b3p	2b4p	3b4p	3b5p	4b5p
1 st Floor	1	1	3	0	2	0	0
2 nd Floor	1	1	3	0	2	0	0
3 rd Floor	1	1	2	0	0	1	1
4 th Floor	0	1	1	0	3	0	0
	<u>3</u>	<u>4</u>	<u>9</u>	<u>0</u>	<u>7</u>	<u>1</u>	<u>1</u>

Residential Amenity

5.8. Residential Amenity

5.8.1. London Plan Policy D6 states where there are no higher local standards, a minimum of 5sqm of private outdoor space should be provided for 1-2 person dwellings with an extra 1sqm for each additional occupant. The space must achieve a minimum depth and width of 1.5m.

5.8.2. All the proposed dwellings provide or exceed the minimum requirement for private amenity space.

5.8.3. In addition, 300 m2 of communal amenity space is provided which provides sufficient space for residents and a child play area.

Quality of Accommodation

5.9. Quality of accommodation

- 5.9.1. The standard of the proposed accommodation is required to comply with policy D6 of London Plan and is assessed on other issues including access to the property, internal layouts, access to light and outlook, size & widths of rooms and the amount of storage provided.
- 5.9.2. Floor plans have been provided to show that the proposed development offers a high standard of accommodation.
- 5.9.3. All rooms and dwellings meet the minimum internal floor space requirements. The layout has been designed to comply with Part M(2) of the building regulations.
- 5.9.4. The large apertures to all habitable rooms will provide natural light well in excess of that required by policy.
- 5.9.5. The proposed development will provide a high standard of accommodation to future occupiers.

Access & Transport

5.10. Access and Transport

- 5.10.1. The site falls has a PTAL rating of 6a on a scale of 0 – 6b with 6b being the best.
- 5.10.2. Table 10.3 of the London Plan requires a dwelling within a PTAL rating of 5-6 to be car free. As such this proposal does not have any provision for parking on site.
- 5.10.3. Table 10.2 of the London Plan requires new dwelling to provide 1.5 cycle spaces for 1 bedroom units and 2 cycle spaces per dwelling for dwellings with 2 or more bedrooms.
- 5.10.4. A total of 47 cycle spaces are required for the 25 residential units in addition to 2 visitor spaces. The cycle stores would cater for 51 cycle spaces using standard Sheffield stands. There is also space for 11 of the 52 spaces to be for larger/adapted cycles. A further cycle store for up to 26 cycles on Sheffield stands is provided for commercial users. Using a combination of Sheffield stands and 2-tier storage solution would allow for over 100 cycle spaces on the site.

Trees

5.11. Trees

5.11.1. There are no trees on site

Refuse & Servicing

5.12. Refuse and Servicing

5.12.1. The refuse store will be in accordance with the Council’s Waste and Recycling in Planning Policy Document (as amended October 2018) with easy access for both the residents and refuse operatives.

5.12.2. The plans show the site will accommodate storage for refuse at the front of the site which will be accessible from the internal common parts of the building

5.12.3. The refuse store will accommodate x 1280L bins. This will provide more than enough capacity for general waste, dry recycling and wet recycling facilities.

- Local policy requires the following storage for landfill waste:
 - 120ltrs – studio – 1 person
 - 130ltrs – 1 bedroom – 2 persons
 - 140ltrs – 2 bedroom – 3 persons
 - 150ltrs – 3 bedroom – 4 persons
 - 160ltrs – 3+ bedroom – 5+ persons

- Local policy requires 128 litres of dry recycling storage per flat and 9.6 litres of food recycling per flat

5.12.4. This is the proposed unit mix:

	1b1p	1b2p	2b3p	2b4p	3b4p	3b5p	4b5p
1 st Floor	1	1	3	0	2	0	0
2 nd Floor	1	1	3	0	2	0	0
3 rd Floor	1	1	2	0	0	1	1
4 th Floor	0	1	1	0	3	0	0
	3	4	9	0	7	1	1
General Easte	<u>360L</u>	<u>520L</u>	<u>1260L</u>		<u>1050L</u>	<u>160L</u>	<u>160L</u>

	1p1b	1p2b	2b3p	2b4p	3b4p	3b5p
1 st Floor	0	1	4	0	1	1
2 nd Floor	0	1	4	0	1	1
3 rd Floor	0	1	3	0	2	0
4 th Floor	0	1	2	0	2	0
Total		<u>4</u>	<u>13</u>	<u>0</u>	<u>6</u>	<u>2</u>
<u>General Waste</u>		520	1820		900	320

5.12.5. The proposed housing mix requires:

- 3,510L for Landfill waste (3 x 1280L bins)
- 3,200L for dry recycling (3 x 1280L bins)
- 240L for food recycling (1x 240L Bin)

5.12.6. This proposal provides a total of 6 x 1,280L and 1 x 240L bins for the residential units. The 43m² bin store comfortably provides enough space for the required number of bins. The residential unit also has space for 10m² of bulk waste storage.

5.12.7. A commercial bin store with sufficient space for 2 x 1280L bins has also been provided.

Landscaping

5.13. Landscaping

5.13.1. Landscaping is a reserved matter and therefore not a material consideration.

5.13.2. The plans provide sufficient information on the ground layout and location of communal amenity space for the purposes of this application.

Affordable Housing Statement

6. Affordable Housing Statement

- 6.1. As the proposal will provide more than 10 residential units, affordable housing is a relevant consideration.
- 6.2. The NPPF outlines that “Where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the total number of homes to be available for affordable home ownership”.
- 6.3. The 2017 GLA SHMA outlines that there is a need for 43,500 affordable homes per year across London, and therefore the delivery of affordable housing on suitable sites should be optimised where possible.
- 6.4. The Croydon SHMA (November 2019), which found the need for affordable/social rent housing is 2,254 per annum.
- 6.5. The proposed scheme is not financially viable if any affordable housing is provided. The financial viability assessment demonstrates that the scheme is not viable with the provision of any affordable housing. Whilst the development could still generate a surplus, the surplus is significantly below the accepted level of developer profit that would be expected in a scheme such as this.
- 6.6. To minimise the loss resulting from the provision of the minimum requirement of 15% affordable housing, this application proposes for all 4 of the affordable housing units to be designated as First Homes for sale at a 30% discount on market pricing.

Other Considerations

7. Other Considerations

Play space and Communal Amenity

7.1. Place Space & Communal Amenity

7.1.1. If the development eventually provided up to 25 units, the requirements for play space and communal amenity would be as follows:

Number of UNITS					
	1 bed	2 bed	3 bed	4+ bed	Total
Market / Intermediate	3	11	7	0	21
Social	1	2	1	0	4
Total	4	13	8	0	25

PLAY SPACE REQUIRED:

42	sq m for 0-4 year olds
31	sq m for 5-11 year olds
23	sq m for 12-18 year olds
97	total sq m for all children

7.1.2. A total of 97m² of play space would be required. The site plan shows that a total of 300m² of communal amenity space is provided to include 97m² for a play area.

Community Involvement Statement

7.2. Community Involvement Statement

7.2.1. A Community Involvement Statement will not be provided at this stage as this is an application for scale only and layout only.

7.2.2. If consent is granted for, a community involvement statement will be provided with an application for reserved matters or with a full planning application.

Air Quality Assessment

7.3. Air Quality Assessment

- 7.3.1. An Air Quality Assessment was undertaken in August 2019 in relation to the consented development for a 4 storey building on the site for 21 residential units. The plans were later amended to reduce the number of units to 17 units.
- 7.3.2. Overall, baseline data for that assessment indicated that the annual and 24-hour mean PM10 and the hourly mean NO2 concentrations met the AQO at the development site and would continue to do so in future years. Monitored and modelled data indicated that the annual mean NO2 concentrations at the roadside façade of the development were likely to be within the AQO at that time and in the first operational year.
- 7.3.3. The results of the dust risk assessment indicated that demolition and construction activities could have had, at worst, medium air quality impacts at nearby receptors. Earthworks and trackout activities could have, at worst, low to negligible air quality impacts. These impacts could have been minimised or removed through the implementation of a construction phase dust management plan detailing the appropriate mitigation measures and dust monitoring.
- 7.3.4. Air quality impacts from construction traffic and operational traffic would have been negligible due to the low number of heavy-duty vehicle movements during the construction phase and the reduction in traffic generated by the proposed development.
- 7.3.5. The air quality neutral assessment found that the proposed development fully met the air quality neutral requirements in respect of transport emissions. It was recommended that a further assessment of the CHP system should be undertaken when detailed energy plant and flue specifications were available to ensure that the emissions met the requirements of the Sustainable Design and Construction SPG and to confirm that the proposed development fully met air quality neutral requirements in respect of building emissions.
- 7.3.6. A full Air Quality Assessment has not been provided with this application for principle and scale only as the data would not be accurate until the mix and sizes of units are finalised. This will be provided with an application for reserved matters (layout) or a with a full application for planning consent.
- 7.3.7. The applicant however commits to the following in respect of Air Quality:

- 7.3.7.1. As with any development, there will be associated construction-phase and use-phase impacts on air quality that will be considered and will be minimised as far as possible for both the internal air quality of the Proposed Development and any contributions to external air quality.
- 7.3.7.2. Any external sources of pollution identified will likely be background concentrations of pollutants and road traffic. Any internal sources of pollution are likely to be VOCs from the use of paints, varnishes and finishes as part of the construction works, and the building users themselves.
- 7.3.7.3. To dilute and control the contaminant sources, mechanical ventilation will be included in the building design.
- 7.3.7.4. Potential impacts during the operational phase of the proposed development may occur due to road traffic exhaust emissions associated with vehicles travelling to and from the site. These will be assessed against the screening criteria provided within the IAQM27 guidance document. It is expected that there will be a relatively low number of vehicle movements generated by the development and as such, air quality impacts are expected to be not significant.
- 7.3.7.5. MVHR will be installed within all units with appropriate filtration to the system inlets. This will maintain internal ventilation rates with filtered air, without the need for windows to be opened or background ventilators to be installed. Purge ventilation in the form of openable windows is also proposed where additional ventilation is needed.
- 7.3.7.6. Construction and demolition/fabric removal on site will be carried out in line with the Control of Dust and Emissions during Construction and Demolition SPG as a best practice guidance document, to minimise air pollution derived from these activities.
- 7.3.7.7. After building completion - but before occupancy - the building will be flushed out to clear the air of any contamination from internal pollutants. To maintain good levels of indoor air quality, residents will be provided with Home User Guides that detail measures to keep the ventilation systems working efficiently and sustainably.
- 7.3.7.8. The Proposed Development will be a car-free development. Additionally, as part of the mitigation measures, the Proposed Development will provide a minimum of 2 no. cycle parking spaces for every residential unit in addition to at least 10 cycle spaces for the commercial units to promote sustainable means of transportation for the residents.

- 7.3.7.9. In the unlikely event that, when a full application or application for reserved matters is submitted, the proposed development does not demonstrably reduce the associated emissions, the applicant can agree an offsetting payment for the excess emissions.

Energy Statement

7.4. Energy Statement

- 7.4.1. The purpose of an energy statement is to demonstrate to the local planning authority that a development will meet the minimum policy requirements of the National Planning Policy Framework, The London Plan 2021 and the Croydon Plan 2018.
- 7.4.2. The energy statement provides information such as the development's carbon emissions, energy efficiency, water usage and heat and power.
- 7.4.3. To be able to calculate the energy savings, carbon emissions, power usage and other related information, the energy assessors require:
- 7.4.3.1. The number of units together with the number of habitable rooms in each unit
 - 7.4.3.2. The detailed design of the building
 - 7.4.3.3. The appearance of the building and the materials to be used
- 7.4.4. The energy statement can only be produced when the final details have been finalised. As this is an application for scale and layout only, the energy statement can only be provided with a full application or application for reserved matters.
- 7.4.5. Although an Energy Statement cannot be provided with this outline application, the applicant will commit to the following:
- 7.4.5.1. Heat Pumps: The applicant will use heat pumps in the development. The use of heat pumps are often the most direct method of reducing CO₂ emissions for a Proposed Development with minimal change in aesthetics or the way in which a building is designed. Often a 'straight swap' alternative for a gas system boiler, the use of heat pumps has the potential to provide significant offset in CO₂ emissions through either an individual or communal system approach.

All Heat Pump systems consume electricity to operate - the Coefficient of Performance (CoP) of the system is the ratio of electrical energy consumed, to heat energy emitted. Generally, a CoP of 3 or 4 can be achieved, meaning 3 or 4 units of thermal energy are produced for each unit of electricity consumed. Heat

pumps will only deliver low grade heat (up to ~50°C) efficiently, and therefore HP systems alone are generally relatively inefficient in providing hot water, as this requires additional electrical input (immersion or increased compressor use). It is also important to note that the flow temperatures for ASHP systems is typically

- 7.4.5.2. Photovoltaics: Photovoltaic (PV) panels convert energy from daylight into direct (DC) electrical current. These are generally roof mounted and provide electrical generation which can either be utilised directly on-site (or nearby), stored in batteries, or exported back to the National Grid. The installation of PV could be used to offset electrical demand within the Proposed Development. The PV array would be connected into the electrical system via an inverter or series of inverters, depending on system size and setup, which could potentially power the electrical peripherals & fittings of the communal spaces of the Proposed Development. Noise will not be an issue – A PV system does not feature moving parts and is silent during operation.
- 7.4.5.3. Energy Storage Although it is believed that the PV generation will not exceed usage at the site, the development could have a battery energy store linked to the PV panels which will enable building occupants to use this energy at any required time. Battery storage can also capture power from the grid and use this at times of peak demand. This means building occupants can ultimately save money since grid energy can be stored at certain times of the day when it is cheaper.
- 7.4.5.4. Carbon Offsetting: The London Plan requires all ‘major residential developments’ to be net-zero carbon and states that (Policy SI 2: C.(1))“where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided, in agreement with the borough....through a cash in lieu contribution to the borough’s carbon offset fund”. The price of carbon has been set by the London Borough of Croydon Plan at £167/tonne/annum over a 30-year period (£5,000/tonne) for the residual emissions. The applicant also commits to policy compliance to achieve a 35% reduction in regulated carbon emissions over Part L 2013 and 10% through energy efficiency measures, with the remaining CO₂ emissions to be offset through a financial contribution which will be secured in a legal agreement. The use of renewable is will be maximised. The also commits to be enabled for district energy connection unless demonstrated not to be feasible. Finally, the applicant will comply with “Be Seen” requirements and will commit to this in a legal agreement.
- 7.4.5.5. In-use Monitoring: The applicant will ensure monitoring and reporting of actual operational energy performance of the development for at least five years. This works to ensure the alignment of actual and estimated energy and

carbon performance, as well as help identify methods for improving energy performance from the project inception stage and throughout the building's lifetime.

7.4.5.6. Lighting: Electrical lighting also represents a significant energy use within a building. 100% low energy lighting will be used to reduce emissions.

7.4.5.7. The applicant will deliver passive and active energy demand reduction measures along with low and zero carbon technologies in order to reduce energy demand and associated CO2 emissions resulting from the Proposed Development's operation.

7.4.5.8. The applicant will maximise the use of renewables with 35% on site and 10% through energy efficiency measures.

7.5. The applicant will further commit to ensuring that the development is fully compliant with all energy requirements applicable for new development and a condition requiring this to be evidenced at the reserved matters stage can be imposed.

Sustainability Assessment

7.6. Sustainability Assessment

7.6.1. For the same reasons provided above, a sustainability assessment can only be provided when the appearance of the building is known.

7.6.2. In the absence of a Sustainability Assessment, the applicant will commit to the following:

7.6.2.1. The design team will incorporate features to reduce the environmental impact of the scheme wherever possible.

7.6.2.2. **Passive:** Passive design is a method of using the features of the building to reduce the energy consumption and environmental impact, without the use of mechanical or electrical plant. These techniques include solar orientation, natural ventilation, dual aspect design where possible, low-medium thermal mass, air tightness, and fenestration design. All apartments have access to a private balcony/garden in accordance with policy DM10.4 of the Croydon Local Plan. Window proportions will be designed to increase daylight levels and allow safe opening to facilitate natural ventilation. Units will be dual aspect where possible to achieve natural cross ventilation and minimise the risk of overheating. It will be ensured that all units meet the minimum daylight standards.

7.6.2.3. **Potable Water Usage:** It is a policy requirement that new residential dwellings are expected to have internal water usage of less than the 110l/person/day in accordance with Building Regulations Part G. The applicant will work towards a target of 95l/person/day has been proposed for this site. The Part G Water Usage tool will be used at an early stage to give a guide to the potential internal water usage.

7.6.2.4. **Surface Water:** New developments should seek to mitigate against the future effects of climate change and so far as possible, reduce water runoff from the site and buildings to alleviate the problems of flooding. A Flood management plan will be submitted to provide recommendations that will protect the units from the potential reservoir flooding. There are several methods to deal with surface water runoff which can be used in isolation or in combination. Some are dependent on the building design and others are dependent on soil conditions. The applicant will ensure the situation after construction is better than it was before which will be achievable as the impermeable area of the site will decrease substantially as a result of the new development.

7.6.2.5. **Transport:** Transport arrangements are a key consideration for any new development. The accessibility of public transport to a site is of high importance to both developers and end users. This can be assessed using the PTAL (Public Transport Access Levels) system. This site has a rating of 6a, where 0 is the worst score and 6b is the best. The site is within walking distance of South Croydon rail station and close to multiple daytime bus routes. Secure and accessible cycle storage will be provided to help encourage the future occupants to make more journeys by bicycle. A travel plan will be prepared which will set out a range of measures that will be implemented at the site to encourage and support sustainable travel.

7.6.2.6. **Sustainable Construction:** It is clearly important that a building should be designed to reduce its environmental impact so far as reasonably practical.

7.6.2.6.1. **Site Waste Management:** The build will be operated under a Site Waste Management Plan which will identify the key sources of construction waste, methods for diverting this waste from landfill, identify those responsible for doing so and monitor performance. Although Site Waste Management Plans are no longer a legal requirement, they offer significant environmental benefits and also cost savings, by encouraging waste reduction across the construction team.

7.6.2.6.2. **Pollution:** The contractor will have in place policies on site to minimize air and water pollution from site-based activities. All surface water will discharge into a surface water drain. All foul water will discharge into the foul water drain. All oil and diesel drums will be stored on an

impervious base with oil-tight bund with no drainage outlet. All drill pipes, fill pipes and sight gauges will also be stored on this bund. Leaking or empty oil drums will be removed from site and disposed of via a licensed waste disposal contractor. Particular attention will be paid to damping down procedures during periods of dry and hot weather. All skips will be covered with a suitable cover i.e. tarpaulin or plastic dust sheets. Any lorries removing waste from site will be suitably covered prior to leaving site. A wheel wash will be provided where practical. A drainage report will be submitted separately as part of the planning application.

- 7.6.2.7. **Biodiversity:** The Urban heat island effect will be reduced for this site through the use of maximising landscaped areas and tree planting where possible. Ground floor amenity and surrounding areas will have planters and soft landscaping. Further details of the proposed biodiversity and ecological improvements to the site will be provided separately with an application for reserved matters. The biodiversity of the site will improve from its current state which currently is built up across the entirety of the site. The substantial green amenity space will result in a Biodiversity Net Gain.

Public Art

7.7. Public Art

- 7.7.1. Public Art comes under appearance which is a reserved matter.

Fire Statement

8. Fire Statement

Background

8.1. BACKGROUND

8.1.1. Site Address

1a Brighton Road, Croydon, CR2 6EA

8.1.2. Description of Proposed development:

Demolition of existing buildings and erection of new block comprising 25 flats and 2 commercial units

8.1.3. SITE LAYOUT PLAN

The following site layout plans should be referred to when viewing this fire strategy document (submitted separately with the application):

- 8.1.3.1. Location map
- 8.1.3.2. Existing Site Block Plan
- 8.1.3.3. Proposed Site Block Plan
- 8.1.3.4. Floor plans

8.1.4. References

This statement has been developed with reference to the following policy/documents:

8.1.5. London Plan Fire Safety policy D12(A) 2021

8.1.6. Article 9A of the Town and Country planning (Development Management Procedure) (England) Order 2015

8.1.7. Approved Document B (Fire Safety) Vol 1: Dwellings (as amended).

8.1.8. British Standard 9991:2015. Fire Safety in the design, management and use of residential buildings. Code of practice.

Building Schedule

8.2. BUILDING SCHEDULE

8.2.1. Site Information

- 8.2.1.1. The site will host a purpose built block comprising 25 flats and 2 commercial units over ground and four upper floors.
- 8.2.1.2. Access to the property will be provided via the existing footpath on Brighton Road.
- 8.2.1.3. Emergency Vehicles will be able to access the site from Brighton Road
- 8.2.1.4. The proposed property consists of 25 self contained flats and 2 commercial units

8.2.2. Building Information

- 8.2.2.1. The external wall system will provide a minimum of 3min fire resistance with a traditional construction composition of an external brick leaf, cavity, internal masonry leaf, and an internal plastered finish (in adherence with the British Standards / Table B4 Approved Document B, as amended).
- 8.2.2.2. The external wall system only contains materials achieving class A2-s3, d2 or be er in accordance with BS EN 13501-1:2018 Fire classification of construction products and building elements. Part 1: Classification using data from reaction to tests fires. British Standards Institution. (The classes of reaction to fire performance of A2, B, C, D, and E are accompanied by additional classifications related to the production of smoke (s1, s2, s3), with s1 indicating the lowest production, and/or flaming droplets/particles (d0, d1, d2), with d0 indicating the lowest production. NOTE: When a classification includes s3, d2 this means that there is no limit set for smoke production and/or flaming droplets/particles.) With the exception of all the following:
- 8.2.2.3. Cavity trays when used between two leaves of masonry
- 8.2.2.4. Any part of a roof that part is connected to an external wall (excluding any part of the roof pitched at an angle of more than 70 degrees to the horizontal if that part of the roof adjoins a space within the building to which persons have access, but not access only for the purpose of carrying out repairs or maintenance if the part is connected to an external wall).

8.2.2.5. The building pay particular attention to the following in reference to fire safety:

- Door frames and doors
- Electrical installations
- Insulation and water proofing materials used below ground level
- Intumescent and fire stopping materials
- Membranes
- Seals, gaskets, fixings, sealants and backer rods:
- Thermal break materials; or
- Window frames and glass

8.2.3. All units and common areas will have water sprinkler systems connected to fire and heat alarms, fire pressurisation systems and mechanical smoke extractors.

8.2.4. Resident Safety Information

8.2.4.1. The proposed dwelling house will benefit from a newly installed L2 Fire detection system (serviced annually) and appropriate emergency light fixtures in accordance with the current UK Building Regulations, approved documents, and British Standards.

8.2.4.2. In the event of a fire, all occupants/visitors are to immediately evacuate simultaneously and congregate at the assembly point located on the pavement on Brighton Road or Selsdon Road

8.2.4.3. There will be level thresholds throughout to enable all Wheelchair users to evacuate safely.

8.2.4.4. Evacuation is to be single file and in a calm manner for the safety of all persons.

8.2.4.5. Approved Document M volume 1 of the Building Regulations 2000 is an accessible housing standard that will be adopted and checked against at building regulation application stage when required by local plan policy.

8.2.5. Technical Complexities

8.2.5.1. Although evacuation from each habitable room within the proposed building will be very straightforward due to the minimal travel distances, there may be the temptation to stay put within the communal grounds at the rear.

8.2.5.2. Notices will be placed throughout the site that will need to be visible and indicate that the assembly point in the event of a fire will be on the pavement on Brighton Road if exiting from the front or Selsdon Road if exiting from the rear.

8.2.6. Fire Service Site Plan

8.2.6.1. Assembly Point - On Brighton Road

8.2.6.2. Domestic fire fighting appliances (i.e fire extinguishers, blankets, etc) are to be positioned within the proposed property in accordance with the latest UK Building Regulation Approved documents and British Standards.

8.2.6.3. Dry and wet risers in addition to fire hoses will be provided for fire fighters in each floor of the building in the communal corridors.

8.2.6.4. Nature of Water Supply: Open water - limited

8.2.6.5. Water Connection: emergency water supply for the purposes of firefighting is to be taken from the a bespoke water supply

8.2.6.6. Emergency Fire Service vehicular access to the proposed property will be via Brighton Road

Conclusion

9. Conclusion

- 9.1. This application for outline consent (layout and scale only) is identical in scale and floor plates to the scheme subject to the planning inspector's determination in APP/L5240/W/23/3326319. The scale of this proposal should be acceptable.
- 9.2. The layout of the flats provides policy compliant units and therefore the layout should also be accepted.
- 9.3. In respect of all other matters it has been demonstrated that the application is compliant or can be compliant at the reserved matters stage.
- 9.4. The local planning authority are therefore invited to support the application and grant outline consent.