

1. DETAILS OF THE DEVELOPMENT

Ref: 18/05248/PRE
Location: 28 Boulogne Road, Croydon, CR0 2QT
Ward: Selhurst
Description: Complete demolition of existing buildings on the site, redevelopment including erection of four blocks up to five stories in height providing 59 self-contained residential units (C3) and 3 commercial units.
Drawing Nos: Bou-HKR-XX-01-PL-A-1000, 1001, 1002, 1003, 1004 + CGIs
Applicant: Evolve Housing – Alice Hainsworth
Agent: Stile Harold William Partnership – Chris Heather
Case Officer: Barry Valentine

2. PROCEDURAL NOTE

- 2.1 This proposed development is being reported to Planning Committee to enable Members to view it at pre application stage and to comment upon it. The development does not constitute an application for planning permission and any comments made upon it are provisional, and subject to full consideration of any subsequent application, including any comments received as a result of consultation, publicity and notification.
- 2.2 It should be noted that this report represents a snapshot in time, with negotiations and dialogue on-going. The plans and information provided to date are indicative only and as such the depth of analysis provided corresponds with the scope of information that has been made available to Council officers. Other issues may arise as more detail is provided and the depth of analysis expanded upon.
- 2.3 The report covers the following points:
- a. Site briefing
 - b. Summary of matters for consideration
 - c. Officers' preliminary conclusions
 - d. Specific feedback requests

3. EXECUTIVE SUMMARY OF KEY ISSUES WITH SCHEME

- 3.1 The site is a "Scattered Employment Site" (Tier 4) and therefore policy SP3.2 of CLP applies which seeks to protect industrial and warehouse activities and uses (B1 (b & c), B2, B8 and employment generating sui generis uses, D1 uses in PTAL 3+ areas). The policy only allows limited residential accommodation on such sites in specific special circumstances, mainly when there is no demand for existing premises as evidenced by 18 months of marketing. The proposed development will not comply with SP3.2 due to the number of units it creates, and due it being in active use and not marketed. Approximately 550 sq.m of

commercial floorspace would be provided that would help to offset the development's impact on employment and industrial /warehousing land.

- 3.2 The proposed development would provide stepping stone accommodation for people whom were recently homeless and have completed the applicant's support program. The accommodation would allow the residents to begin living independently and hopefully give them a platform and long term security to be able to live in permanent residential accommodation in the future. The development would be 100% Affordable Rent. Officer's consider that there is justification for allowing a departure from the Croydon Local Plan (2018), in regards to the loss of industrial/warehousing land, on the basis that the development would benefit those most in need.
- 3.4 The proposed bulk and mass in design terms is acceptable, but there are concerns about the extent of development's impact on neighbouring living conditions, particularly in terms of overshadowing of neighbouring properties' gardens. The detailed design of the building is progressing in an appropriate manner, but needs further development.
- 3.4 Officers do have some initial concerns with the access to and from the site, given the narrowness of the access way from Boulogne Road, and the potential for pedestrian movement through this narrow space. Further information is still required in regards to car parking, but officers do have some concerns about the lack of disabled residential parking bay provision.

4. SITE BRIEFING

- 4.1 28 Boulogne Road is an area of commercial land that sits to the rear of residential properties nos. 2 to 26 Boulogne Road and 37 to 49 Princess Road, and commercial property 22 to 24 Hampton Road, which is currently occupied by Travis Perkins. The site is to the immediate north of Boulogne Road Playground.
- 4.2 The site contains a series of one to two storey high industrial buildings set round a central car park area. There is an access road into the site that runs along the southern flank elevation of 26 Boulogne Road.



Image 1 – Ariel Image Looking West

- 4.3 Land levels do vary across the site, sloping down from the east to the west, with much of the site set close to a storey below the garden level of residential properties that surround. There are no known trees on the site, but there are many trees that surround on neighbouring land, including on the eastern boundary with Boulogne Road Playground.
- 4.4 The site has a Public Transport Level of 2 (Poor). Despite this rating the site is reasonably well connected, with buses running along Whitehorse Lane that provide convenient access into Croydon Town Centre and Thornton Heath. The site is also within walking distance of Selhurst Train Station.
- 4.5 The site is located with Flood Risk Zone 1 (low) as defined by the Environmental Agency. The site is modelled as being at medium risk (1 in 100 years) from surface water flooding.
- 4.6 The site as per Croydon Local Plan (2018) is subject to Place Specific Policy DM36.5, which is set out below:

DM36.5 In the area of the junction of Windmill Road and Whitehorse Road, to create a sense of place of this area proposals should:

1. Create building lines and frontages which positively reinforce and respond to the form of the junction;
2. Use tree planting to reinforce the street alignment; and
3. Complement the existing massing of the immediate area around the Windmill/Whitehorse Road Junction, by ensuring that the overall height of the building does not exceed 5 storeys; or complement the existing predominant building heights of 2 storeys up to a maximum height of 3 storeys; or ensure the ridge line is no taller than those adjacent to it

- 4.7 The site is not within a Conservation Areas and there are no Listed Buildings within the site, or whose setting would be impacted by the proposed development. To the north of the site is Queens Road Cemetery, a locally listed historic park and garden.

Relevant Planning History

- 4.8 The site has an extensive planning history, but the most relevant entry is as follows:

Planning permission reference 94/01444/P was granted on the 19/10/1994 for the continued use for storage and maintenance of equipment used by elderly and disabled persons with associated information and assessment area.

Proposal

- 4.9 The proposal is currently:

Complete demolition of existing buildings on the site, redevelopment of the site including erection of four blocks up to five stories high providing 59 self-contained residential units (C3) and 3 commercial units.

- 4.10 The applicant are Evolve Housing, a homelessness and community support charity, providing accommodation and support for people affected by homelessness, to enable them to live independently. They support around 2,000 people each year, in and around London. They are a registered housing provider, and have developed over 300 new units across 8 schemes, 7 of which were in Croydon.
- 4.11 The development would provide stepping stone accommodation, allowing single people who have completed Evolve homeless programme of support to move on and to begin to live independently, as well as provided homeless families with good quality temporary accommodation.
- 4.12 It is understood that the applicant is intending to submit their planning application at the end of July. Officers do have some concern that there is a lot of work to be done before a scheme can be fully supported and that a July submission is optimistic.

5. SUMMARY OF MATTERS FOR CONSIDERATION

5.1 The main matters for consideration in a future submission are as follows:

- Land Use
- Design
- Impact on Neighbouring Properties Living Conditions
- Highway and Parking
- Other Considerations
- Mitigation

Land Use

Employment Use

5.2 The site is a “Scattered Employment Sites” (otherwise known as “Tier 4” sites). Policy SP3.2 of the Croydon Local Plan (2018) seeks to protect industrial and warehousing activities on such sites. Only certain uses are deemed appropriate for such sites, namely Class B1 (excluding offices - B1a), B2, B8 uses, employment generating sui generis uses and D1 uses in locations where the PTAL rating is 3 and above. The policy goes on to state that planning permission for limited residential development will be granted if it can be demonstrated that:

- There is no demand for the existing premises or for a scheme comprised solely of the permitted uses; and
- Residential use does not harm the wider location’s business function.
- Opportunities for employment and skills training will be considered via Section 106 where possible.

Policy SP3.2 advises that evidence of demand will need to be informed by at least 18 months of marketing.

5.3 The existing lawful planning use of the site is storage and distribution (B8), as established through previously granted planning permission reference

94/01444/P. However, there are a series of complimentary ancillary uses also present, including wheelchair repair workshops (B1 (c)), sales office (B1 (a)), showroom (A1) and wheelchair evaluation centre including therapy (D1). These uses are active on site. The GIA floor area of the existing buildings on the site is approximately 1,125 sq.m.

- 5.4 The development will be contrary to policy SP3.2 of Croydon Local Plan (2018). Whilst the current occupier will be relocated (details of which are expected to accompany any future submission), the site will not be marketed to find an alternative policy compliant user. In addition, the proposed development will not comply with SP3.2 due to the large number of residential units it would create.
- 5.5 In favour of the development, the proposed change of use would not significantly impact the wider location's business function. The use of the site, which is largely centred around wheelchair users and those with disabilities, is specialised, which causes the site to operate in a largely self-contained manner from the rest of the employment site to the south east. There are few links with surrounding businesses and the current use is not likely to generate significant trade or commercial presence opportunities to the other businesses located within the wider employment site. The site's location also reinforces the self-contained nature, being located at the furthest western edge of the employment site, furthest from the main road and accessed solely from Boulogne Road, where as the rest of the employment site is accessed from Hampton Road.
- 5.6 The site would continue to provide employment opportunities as three commercial units are proposed at ground floor level, with a floor area of approximately 550 sq.m. This to some extent potentially negates the impact of the development in employment terms, as well as the development's (limited) impact on business function of the wider employment site. The applicant has not yet indicated what type of uses would occupy the commercial areas nor the number of people that would be expected to be employed in the future, so the full impact on industrial/warehousing land and in employment terms is not at this stage fully understood. The new commercial floorspace is likely to be of a better quality than the existing.

Residential Use

- 5.7 The London Plan (2016) sets a minimum ten year target for the borough of 14,348 new homes over the period of 2015-2025. The Croydon Local Plan (2018) to a minimum twenty year target of 32,890 over the period of 2016 to 2036. The Draft London Plan (2017) has provisionally set a minimum ten year target for the borough of 29,490 new homes over the period of 2019/20 to 2028/29. The proposed development would create additional residential units that would make a contribution to the borough achieving its housing targets as set out in the London Plan (2016) and the recently adopted Croydon Local Plan (2018). This is a benefit of the proposed development. However this is considered to be of limited weight given that the borough has sufficient land for its five year housing supply to meet its targets, without the need to build on industrial land.
- 5.8 Policy SP2.5 of the Croydon Local Plan (2018) set out that a minimum of 50% of units must be secured as affordable housing on sites of ten or more units. All

units provided by the development would be affordable rent, easily exceeding the overall 50% target. The provision of 29 additional affordable housing units in excess of the target is a significant positive in the schemes favour.

- 5.9 Policy seeks a 60:40 tenure split between affordable rented homes and intermediate (including starter) homes, unless there is agreement between Croydon Council and Registered Provider that a different tenure split is justified. The split seeks to provide a range of housing types to help ensure the creation of mixed and balanced communities. The proposed development would be 100% affordable rent. Rents would be set at the GLA's London Affordable rent levels, but the applicant is exploring whether rent levels could be provided at an even lower rate. The development would not meet the policy's preferred tenure split, but this is not a significant issue given that the proposal would achieve other social objectives (detailed in more depth in paragraphs below), the development would meet a specific need and only a relatively small number of units would be created, so not resulting in significant unbalancing effect in the creation of mixed and balanced communities.
- 5.10 The development would provide a very specific housing product that would meet a specific housing need that has undeniable social benefits. The applicant are Evolve Housing who are a homelessness and community support charity, whom provide accommodation and support for people affected by homelessness, to enable them to live independently. They are a registered housing provider. The development would provide stepping stone accommodation, allowing single people who have completed Evolve homeless programme of support to move-on and to begin to live independently, as well as provided homeless families with good quality temporary accommodation.
- 5.11 The people moving from hostel accommodation into the single units would be offered a minimum three year tenancy. These tenancy lengths offer stability to the intended residents, allowing them an opportunity to plan for their move, ideally onto the property ladder via shared ownership. The terms and need for the occupants of the family units have not yet been discussed and agreed with Croydon Council, but are likely to have a similar structure.
- 5.12 The development would indirectly benefit Croydon Residents by saving the council an estimated £300,000 per year, which in turn can be redirected to other resources and services. The efficient use of council resource and provided tax payers with good value for money, is of public benefit, which is of some positive weight in the balance of a decision.
- 5.13 Whilst the development would be a departure from the Local Plan (2018), the benefits of the development as listed above are sufficient to justify this departure. It envisaged that the benefits of the development, namely the provision of stepping stone accommodation for people whom were recently homeless would need to be secured via S106. This would be for the full 100% of units.

Housing Mix

- 5.14 Policy SP2.7 sets a strategic target of 30% of all new homes up to 2036 to have three beds or more. Policy DM 1 sets out a minimum provision of 3 bed units on

sites of 10 or more dwellings. In an urban area with a PTAL rating of 2, there is a policy expectation that 60% of the units be three beds. No three beds unit are proposed. However, officers consider this to be acceptable in this instance given the housing mix profile of the units have been tailored to meet the needs of those who most likely to find themselves homeless or living in hostel accommodation.

Quality of Residential Units

- 5.15 All the proposed residential units meet minimum floorspace standards set out in the London Plan (2016). The Mayor of London Housing SPG advises that developments should minimise the number of single aspect dwellings, and that north facing units should be avoided. North facing is defined as having an orientation less than 45 degrees either side of north (i.e. between north west and north east). The applicant states that the units are not north facing (face north easterly at angle of 45.3 degrees), and are arguably dual aspect, with the secondary aspect facing into walkways that are only partially enclosed. The units would receive good levels of privacy and outlook, with good separation distances between the blocks.
- 5.15 The units, with exception of some of the units located at ground floor level, would not have their own private external amenity space. There would be communal external space provision within the enclosed garden area within the centre of the main south eastern block, at third floor level at the north westerly wings of the building and at fourth floor level on the eastern central corner of the main block. The applicant is exploring incorporating playspace into the communal spaces and/or making a financial contribution to the improvement of Boulogne Road Playground. The applicant has indicated that they do not wish to provide private external amenity space for the units, as it would add to the build cost, which in turn would compromise the key objective of the applicant which is to deliver 100% affordable housing for people whom were homeless.
- 5.16 There are some concerns about the limited number of cores. This causes somewhat convoluted access routes to some of the units, particularly the wheelchair units which are located at the end of the corridors. Having a limited number of cores also potentially causes social and security challenges, with so many units being accessed via one core. The reason for the lack of cores is understood to be linked to build cost and potential loss in the total number of residential units, which in turn would compromise the ability of the applicant to deliver 100% affordable housing. This, alongside the other quality of residential units points raised above, will need to be considered in the planning balance; officers are keen to get a steer from Members on this matter in particular.

Design

- 5.17 The site ground level generally sits a storey below the garden level of surrounding properties. These land levels are favourable and allows the development to be taller than otherwise normally would be appropriate. From Hampton Road, the development would predominantly read as three storeys in height, and would gradually step up in height from the two storey properties that form part of the wider Hampton Road context. The taller fifth storey element is

set centrally into the site and is in part obscured from views from Hampton Road by the roofs of the industrial buildings, as demonstrated in the series of images below.

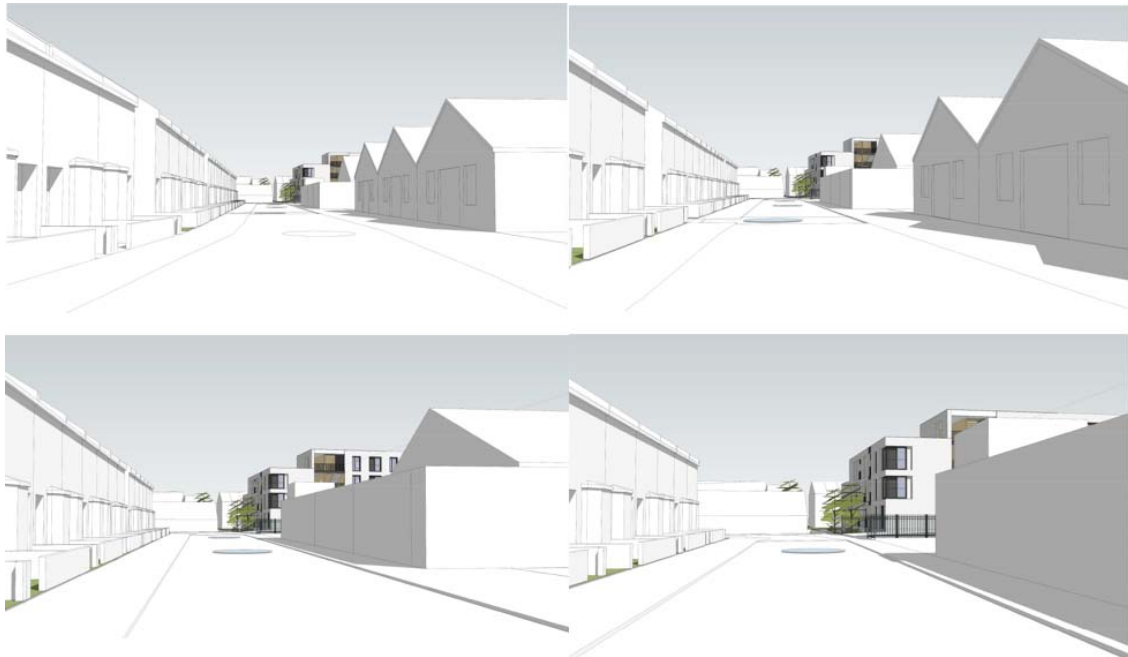


Image 2 – Model images of development massing from Hampton Road.

5.18 The main view from Boulogne Road would be over the park. The building closest to two storey Boulogne Road properties is four storeys in height, but due to land levels would read as three. The spacing between the development and the Boulogne Road properties ensures an appropriate transition of scale that helps create an appropriate backdrop to the park.



Image 3 – Model images of development massing from Boulogne Road

5.19 The building's footprint and single unit layout approach is understood to be driven by the modular design and the applicant's need to keep building costs low. Officers have queried this, and in particular whether a dual core could be created and/or additional massing be created in the townscape gap on Princess Road.

The creation of a gap and new connecting path between Hampton Road and Boulogne Road is welcomed, and ensures improved connectivity and circulation, but also an appropriate relationship and separation to the Travis Perkins site to the east.

- 5.20 Giving the iterative nature of discussions, only a few CGIs from a limited number of angles have been provided, and no elevations or sections. As a result it is difficult to provide detailed comments. From the CGIs that have been provided, officers are pleased with how the detailed design is progressing. The elevation has large windows and pleasing rhythm that helps to break up the massing/bulk of the building, giving it a high quality contemporary appearance. The windows appear to have deep reveals which helps to create articulation. The use of what appears to be brick is supported and would help to embed the development into its semi residential context, whilst also being a robust material choice. There appears to be pleasing brick detailing and use of different colour of bricks that adds visual interest and variety, helping to break up the mass of the development and give it an identity. Being a backland site with commercial units at ground floor level, care will be needed to ensure that the spaces to and around the site are secure, safe and welcoming. Further thought and details will need to be submitted on how this will be achieved. The blank end walls of the buildings, especially where they face neighbours will be important, and need to be well designed in order to prevent them appearing imposing.



Image 4 – CGI taken from new path way close to Hampton Road entrance

Impact on Neighbouring Properties Living Conditions

Sunlight and Daylight

- 5.21 The applicant has submitted a sunlight and daylight study that tests the scheme against guidance contained with BRE's 'Site Layout Planning for Daylight and Sunlight - A Guide to Good Practice' End Edition, 2011'. See Appendix 1 for BRE sunlight and daylight definitions. The submitted sunlight and daylight assessment measures the impact of the development on properties in Hampton Road (nos. 79, 81 and 99), Princess Road (nos. 36 to 42 consec) and Boulogne Road (nos. 2 to 26 evens). It is worth noting that the model tested by the applicant for their

sunlight and daylight test is marginally larger in size than the scheme currently being presented before committee. The area in yellow in the image below was included in the sunlight and daylight model test, but has now been revised out of the scheme. Some of the data reported is likely to have improved as a result of this change, particularly for 37 F to H Princes Road.

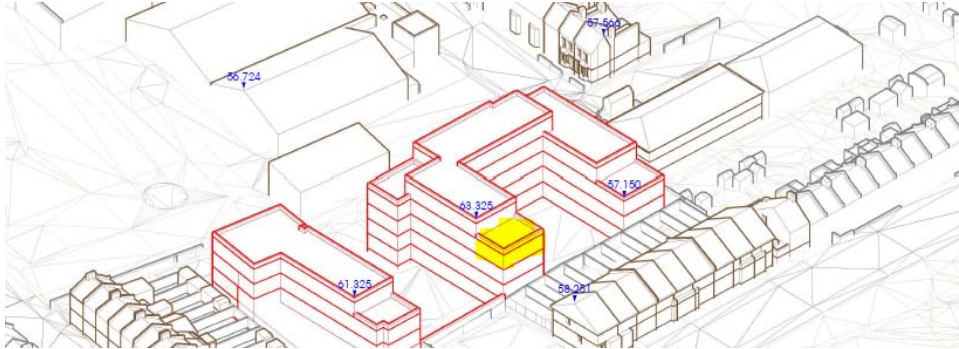
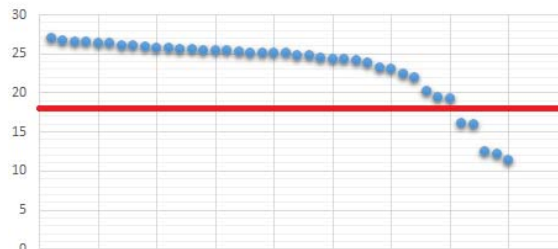


Image 5 – Daylight and sunlight model, with element highlighted in yellow that is no longer proposed as part of the current submission.

5.22 40 of the 110 windows that were tested under BRE’s VSC test fail, as they would achieve a VSC of less than 27%, and a ratio reduction of over 80%. As such these windows and the rooms they serve are likely to experience a noticeable reduction in daylight. However, the vast majority of the windows would still receive good level of daylight, with all but five windows retaining a VSC in excess of 18%, which is an amount of daylight that properties set within urban environments commonly experience. The five windows which fall below 18% are all ground floor windows located on different properties in Boulogne Road, thus the impact would to some extent be spread, and as such would have a limited impact of standard of residential accommodation that surrounds the site.



Graph 1 – Distribution of proposed VSC scores (%) of windows that failed VSC test.

5.23 The distribution of the VSC ratio reduction failures are shown below. Of the 40 windows that failed, 36 are classed as minor failures by officers scoring over 60%, and only 3 were moderate failures scoring less than 60% and more than 40%. There was no major failures (i.e. windows scoring less than 40%). Importantly there was only one window, belonging to 20 Boulogne Road, which scored less than 18% in total VSC, with a score of 15.93%, and which would also moderately fail in terms of VSC ratio, scoring 59%. In light of this, the developments impact in terms of VSC whilst detrimental, is not considered significant enough to the living conditions of neighbouring properties to justify refusal of planning permission in its own right.

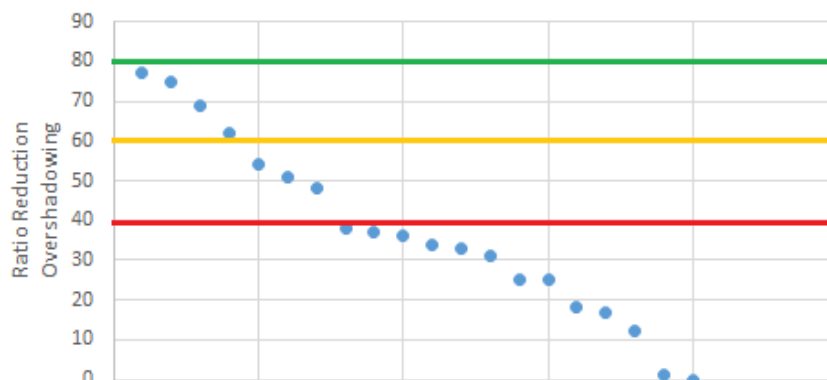


Graph 2 – Distribution of VSC ratio reductions of window that failed VSC test

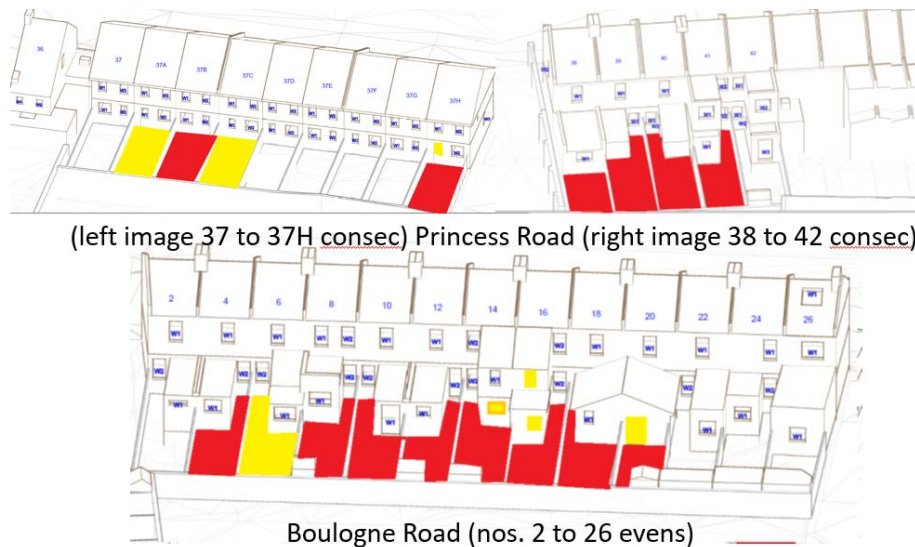
5.24 In terms of daylight distribution, of the 102 rooms assessed, there were only 15 failures. 10 of these failures are classed by officers to be minor, with the affected rooms scoring over 60% and 5 being moderate failures scoring over 40% and no major failures with a score below 40%. All the rooms that failed the daylight distribution test had windows that served them which also failed the VSC tests. The moderate fails in daylight distribution occurred on 37H Princes Road, 14, 16 (2 rooms), 18 and 20 Boulogne Road, the locations of which are shown on graph 4.

5.25 In terms of sunlight, of the 100 windows tested, only 6 would fail to meet target values set out in BRE guidance. These failing windows would experience a significant reduction in winter sunlight hours, but in terms of annual sunlight proposed hours the reduction would only be minor, with the lowest score being 71% of its former value. The impact of the development in sunlight terms is justifiable.

5.26 The submitted sunlight and daylight assessment includes a test that measures the extent that the development would overshadow neighbouring properties' gardens. The test measures the percentage of a garden which would receive 2 hours sunlight on spring equinox (21st March). If less than 50% of a garden receives less than 50% and the reduction is greater than 80% then this is considered to be a failure. Of the 27 gardens measures that surround the site, 21 would fail BRE overshadowing test. 4 of these failures are classed by officers to be minor, 3 would be moderate and 14 would be major. The results are plotted in graph 3 and the location of the moderate/major failures are shown on graph 4. The applicant has also run the optional test taken on the 21st June, which represents the time of year when shadows are at their shortest. At this time of the year, all gardens would meet the same standard.



Graph 3 – Ratio reduction as % in garden overshadowing on spring equinox.



Graph 4 – Locations of major (red) and moderate (yellow) BRE failures of overshadowing to gardens and Daylight Distribution to rooms (windows to the room only coloured in)

Outlook and Sense of Enclosure

5.27 The applicant to date has not provided sections through the development to neighbouring windows, and as such clear conclusions cannot be reached on what the impact would be on outlook and sense of enclosure to neighbouring properties. There is however likely to be some detrimental impact to those properties whose gardens face onto the ends of the blocks. Some of these gardens are 12m long, and the wall is estimated to be at least two storeys high.

Privacy

5.28 At this stage no significant concerns are raised regarding the impact of the development on neighbouring properties' privacy due to separation distances and the angles at which windows they would face. Care will be needed in regards to the design of some of the walkways to ensure that these do not have views into neighbouring gardens and windows. The applicant has supplied some precedent images that show that the walkways have fretted panels that would help to prevent unneighbourly overlooking.

Noise

5.29 The impact of noise activity from any commercial activity will need to be considered as the applicant develops the scheme. The most likely protection would be in the form of conditions that control aspects such as hours of operation. The noise levels from any air handling units, mechanical plant or other fixed external machinery will also be expected not to increase background noise levels when measured at the nearest sensitive residential premises. In effect, this means the noise levels from any new units will need to be at least 10dB below existing background noise levels. Care will also need to be had to ensure that increased use of the access road does not cause excessive noise disturbance to the adjoining neighbouring property. In terms of light pollution, the development

will be expected to comply with guidance contained within 'Guidance Notes for the Reduction of Obtrusive Light GN01:2011.

- 5.30 In terms of impact on neighbouring properties living conditions, there is currently concern about loss of sunlight to neighbouring gardens and, to a lesser extent, impact on daylighting, as well as potential for loss of outlook/enclosure. Whilst this will need to be considered in the planning balance, officers are keen to get a steer from Members on the need, or not, to set the buildings further from the adjoining residents or reduce the massing.

Highways and Parking

- 5.31 The site is located in an area of low public transport accessibility and high parking stress. Ordinarily it would be required for the development to cater for its own parking demand by providing a level of parking consistent with the level of car ownership in the area, which for the Selhurst Ward is 0.62 cars per dwelling. Nevertheless in this scenario given that the development is to provide housing for people whom were recently homeless, it is likely to be possible to justify a lower level of car parking space provision as car ownership is likely to be very low amongst residents. The development will also likely be required to be car parking permit free to ensure that the development does not have an adverse impact on parking stress.
- 5.32 The applicant has expressed the desire to provide no wheelchair car parking spaces for the residential units. Officers consider this inappropriate given that wheelchair accessible units are proposed.
- 5.33 No details of the level of car parking for the commercial units has so far been provided. The non-operational side of the commercial use will need to comply with London Plan (2016) maximum parking standards.
- 5.34 Any new car park spaces will be expected to provide electric charging vehicle points in line with the London Plan (2016). At present, the London Plan requires residential development to provide 20% to be active, and 20% to be passive. The draft London Plan, requires 20% active and 80% passive. For non-operative B1 car parking 20 per cent of all spaces must be for electric vehicles with an additional 10 per cent passive provision for electric vehicles in the future.
- 5.35 In terms of the cycling the London Plan (2016) expects the following level of provision
- C3 – one space for one beds, two spaces for two beds for the units plus one space per 40 units for visitors.
- B1 – one space for every 150 sq.m plus one space per 1000 sq.m for visitors
- B2 to B8 – one space per every 500 sq.m plus one space per 1000 sq.m for visitors
- 5.36 The applicant has indicated that they may seek to provide a lower level of cycle parking provision due to the low ownership of cycles amongst the expected residents. Whilst there may be some justification for this, officers have asked the

applicant to think innovatively to increase cycle ownership amongst its residents, especially as this would increase social mobility which can be a significant issue for those with low incomes.

- 5.37 The entrance into the site is reasonably narrow and does not appear capable of handling two way traffic into/out. Given that pedestrian access is likely to be required through this entrance (especially given the likely low car ownership) extra care will be needed in regards to its design and layout. The provision of a new pedestrian access route from Hampton Road is welcomed.

Other Considerations

- 5.38 There are no trees on the site, but there are trees on neighbouring land, for example within the Boulogne Road playground at the entrance, whose roots and canopies could potentially be impacted by the development itself or from the construction of the development. No significant concerns are raised at this stage, but clarity will be needed going forward.
- 5.39 London Plan Policy 6.3 requires Construction Logistics Plans to be secured. London Plan Policy 7.15 concerns the reduction of noise and enhancement of soundscapes. London Plan Policy 7.21 seeks to improve air quality. Croydon Local Plan: Strategic Policy SP6.3 requires development to positively contribute to improving air and water quality by minimising pollution. Policy SP8.4 states that major development proposals will be required to be supported by transport assessments, travel plan and construction logistic plans. Croydon Local Plan (2018) Policy SP6.4 states that the Council will seek to reduce flood risk and protect groundwater and aquifers. Policy DM25 provides the Council's detailed requirements in relation to drainage and reducing flood risk.
- 5.40 Major residential schemes are required to meet Zero carbon. Non-residential buildings should achieve a 40% carbon dioxide emissions reduction over the Target Emissions Rate (TER) set out in the Building Regulations (2010). The London Plan Sustainable Design and Construction SPG (2014) sets out that this is broadly equivalent to a 35% reduction over the 2013 Building Regulations Part L, which is the most up-to-date standard. New build non-residential developments of 500 sq.m or above will be expected to achieve a minimum of BREEAM Excellent.
- 5.41 All major developments are required to provide a Flood Risk Assessment (FRA). This will need to consider all sources of flooding and suggest appropriate mitigation measures. A Sustainable Urban Drainage System (SUDS) strategy will also be required so that the development achieve greenfield runoff rates.

Mitigation

- 5.42 At this stage it is envisaged that planning obligations will be required to mitigate the impacts, with the following Heads of Terms:

- Affordable housing (100% on-site secured together with type i.e. homeless)

- Improvements to Boulogne Road Playground (in the event playspace cannot be re-provided on site)
- Employment and training (contribution and commitments both construction and operation)
- Air quality contribution (£500 per unit)
- Zero carbon off-setting (if required, dependant on energy strategy)
- Car parking permit free for future occupiers (if required, given occupiers)
- Potential highway works (if required, to site entrance)
- Potential public realm works (if required, to new pedestrian site entrance)

6. PRELIMINARY CONCLUSIONS ON KEY ISSUES

- 6.1 The proposed development would result in the loss of employment/industrial land. However, the impact of this loss on the borough employment land provision, and jobs generally, is offset in part by the provision of commercial floorspace within the development. Whilst this would not normally be enough, when combined with the unique housing offer and its outstanding social objectives that will benefit those most in need, presents a compelling case such to justify departure from Croydon Local Plan (2018).
- 6.2 Officers feel that some relaxation on the quality of the residential units and associated policy requirements can be justified given that the proposed accommodation would be a substantial improvement to the intended residents than the accommodation (for example hostels) they would likely reside in if this development were not to go ahead. The proposed development would improve the quality of life of the residents that would occupy them, and as such considered acceptable.
- 6.3 The proposed bulk and mass of the development in purely design terms is acceptable. The detailed design of the development is progressing in an appropriate and pleasing manner, although significant design development is still needed.
- 6.4 Officers do have concerns about the impact of the development on neighbouring properties, particularly in terms of overshadowing of neighbouring gardens. Officers would like the applicant to explore different massing options further, for example moving the building adjacent to Boulogne Road away from these properties to see if the objectives of the development can be achieved, but in a way that would ensure that impact on neighbouring properties is minimalised.

7 SPECIFIC FEEDBACK REQUESTED

- 7.1 In view of the above, it is suggested that Members focus on the following issues:
- The principle of the development, specifically in allowing 100% affordable housing for people whom were homeless on industrial land, and whether the current commercial offering is likely to be sufficient?
 - Where you feel it would be reasonable (if at all) to apply flexibility (for example on residential unit quality) given the unique nature and social objectives/benefits of the proposed use.

- The initial design approach of the scheme (siting, scale, mass, use of materials).
- Impacts of the proposal on neighbouring occupiers and in the wider vicinity of the site, and whether the applicant needs to reduce or re-look at the massing to improve the development's relationship to its neighbours.
- Whether disabled car parking for the residents, car parking for the commercial and cycle parking levels currently indicated are appropriate.
- Any other matter that Members see as important to secure if this development was to come forward.

Appendix 1: BRE Guidance Terms

Daylight to existing buildings

The BRE Guidelines stipulate that the diffuse daylighting of the existing building may be adversely affected if either:

- the vertical sky component (VSC) measured at the centre of an existing main window is less than 27%, and less than 0.8 times its former value (or reduced by more than 20%), known as “the VSC test” or
- the area of the working plane in a room which can receive direct skylight is reduced to less than 0.8 times its former value known as the “daylight distribution” test.

Sunlight to existing buildings

The BRE Guidelines stipulate that the sunlight of an existing window may be adversely affected if the centre of the window:

- receives less than 25% of annual probable sunlight hours (APSH), or less than 5% of annual winter probable sunlight hours between 21 September and 21 March (WPSH); and
- receives less than 0.8 times its former sunlight hours (or a 20% reduction) during either period; and
- has a reduction in sunlight received over the whole year greater than 4% of annual probable sunlight hours.

If one of the above tests is met, the dwelling is not considered to be adversely affected.