

1. DETAILS OF THE DEVELOPMENT

Ref: 24/00259/PRE
Location: Land to South of Duppas Hill Road, Croydon
Site known as Heath Clark North
Ward: Waddon
Description: The redevelopment of the site to deliver approximately 210 new residential dwellings and approximately 482sqm of non-residential floorspace (Use Class F.1/F.2), as well as private and communal amenity spaces, parking, cycle parking, enhanced public realm and landscaping, and relevant infrastructure works.
Applicant: The Hyde Group Ltd
Agent: Diana Thomson of Savills
Case Officer: Georgina Betts

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 applications, 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. Executive summary
 - b. Site briefing
 - c. Design Review Panel feedback
 - d. Matters for consideration and officers' preliminary conclusions
 - e. Specific feedback requests
 - f. Procedural matters

3. EXECUTIVE SUMMARY

- 3.1 The scheme has so far been developed through pre-application meetings with officers. At the time of publishing this report, it will have been considered by the Design Review Panel (DRP) on 3rd October 2023; their views will be addressed in an Addendum Report so members are aware of their thoughts on the scheme.
- 3.2 Discussions so far have focused on the principle of the development following the previous appeal decision, the scale/height/massing, the design approach, the impact on the historic park and garden, landscaping and public realm, impacts on neighbouring

buildings amenity and transportation matters. Discussions are ongoing in relation to these matters.

- 3.3 With regards to the affordable housing provision, the applicant has advised that the scheme will come forward as 35% affordable. The proposal at this time is providing a 60:40 split in favour of affordable rented units versus shared ownership and would appear to follow the fast track route as set out in the London Plan 2021.
- 3.4 It is anticipated that a full planning application will be submitted by the end of this calendar year.

4. SITE BRIEFING

- The site is currently open, undeveloped land and it was formerly a school playing field. It is bounded by Duppas Hill Road to the North and the rear of properties fronting Stafford Road to the West.
- The site was previously part of the wider site, known as Heath Clark. The southern portion of the site is currently being built out through permission 19/02049/FUL. This pre-application relates to the northern portion of the site, shown in Figure 1 below, and known as Heath Clark North.
- The immediate context on Stafford Road is 3 storey compact terraced housing with a shopping parade at ground floor level. There are small scale industrial sheds and a car showroom to the Western boundary.
- Duppas Hill Road is a red route. The residential character along Duppas Hill Road is 2-3 storey semi-detached housing with some larger flatted blocks.
- The Northern part of the site is prone to surface water flooding and there is a significant level change.
- There is pavement directly outside the site boundary on Duppas Hill Road however this is narrow and ends abruptly as the site meets Duppas Hill Park to the East.
- Duppas Hill Park is a Locally Listed Park & Garden and parts of the park are also designated as a Site of Nature Conservation Importance. There are no Statutory Listed Buildings or Locally Listed Buildings in the vicinity of the site.
- The southern part of the site is being developed as residential use (Heath Clark South, 19/02049/FUL). It consists of 2-5 storey flatted blocks arranged around a central green.
- Heath Clark South is accessed from the south via Old School Place. The boundaries are densely planted however there is only one significant tree within the site



Figure 1: Aerial view of Site

Designations

- An allocated site (Allocation No 16);
- At risk of Surface Water Flooding;
- Lies within a critical drainage area;
- Lies on a strategic road network (TfL);
- Lies adjacent to a locally listed historic park and garden and site of nature conservation area importance;
- Lies adjacent to the Waddon Place Specific Policy (DM49.1);
- Lies within the emerging Draft Purley Way Masterplan.

16: Heath Clark, Stafford Road

Place	Postcode	Size of site	Site description	Suburban, Urban or Central location?	Public Transport Accessibility of area	Local character of area	
Waddon	CR0 4NG	3.24ha	Field	Urban	High	Compact houses on relatively small plots; Industrial Estates; Large buildings in an urban setting; Mixed type flats	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Number of homes
Secondary School and residential development subject to access from Stafford Road		The site is of a suitable size for a secondary school, is in an area that has a high demand for school places and can make a significant contribution to meeting this demand. The site is also large enough to accommodate new homes as well as a secondary school. Residential development will help to meet the need for new homes in the borough. Access to this site is currently an issue and development is dependent upon the reconfiguration of the Fiveways junction as currently it is not possible to provide access on to Stafford Road or Duppas Hill Road because of the volume of traffic on these roads. The Sustainability Appraisal recommends the loss of open space is mitigated by the development. School buildings and residential development should be located away from areas at risk from surface water ponding.			2021 - 2026	Site has no known developer interest and the Council will need to work with landowner to bring it forward	62 to 128

Figure 2: Extract from the Croydon Local Plan 2018 - site allocation

4.1 The current Croydon Local Plan (2018) is in the process of being reviewed; the partial Local Plan (Regulation 19) review has no weight at this time given the stage it is at, following public consultation. The Local Plan Review proposes to amend the Site 16 allocation, with the removal of the school allocation and the inclusion of higher number of residential units, although such is shared across both the north and south sites. Details as below:

Site 16: Heath Clark, Stafford Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Purley Way (Waddon)	CR0 4NG	3.24ha	Field	Urban	High	Compact houses on relatively small plots, Industrial Estates, Large buildings in an urban setting, Mixed type flats	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Secondary School and Residential development subject to access from Stafford Road		<p>The site is of a suitable size for a secondary school, is in an area that has a high demand for school places and can make a significant contribution to meeting this demand. The site is also large enough to accommodate new homes as well as a secondary school. Residential development will help to meet the need for new homes in the borough. Access to this site is currently an issue and development is dependent upon the reconfiguration of the Fiveways junction as currently it is not possible to provide access on to Stafford Road or Duppas Hill Road because of the volume of traffic on these roads. The Sustainability Appraisal recommends the loss of open space is mitigated by the development. School buildings and residential development should be located away from areas at risk from surface water ponding.</p>			<p>2021-2026 2024-2029</p>	<p>Site has no known developer interest and the Council will need to work with landowner to bring it forward Site has planning permission</p>	<p>62 to 128 266</p>

Figure 3: Extract from the Local Plan Review - site allocation

Relevant Planning History

19/02049/FUL – Heath Clark South

4.2 Erection of three buildings comprising 126 residential dwellings (Use Class C3), ranging from two to five storeys together with associated access, car parking, cycle parking, landscaping and associated infrastructure works. Granted, currently under construction.



Figure 4: Heath Clark South consented scheme under construction

21/05865/FUL – Heath Clark North (Extant Consent)

- 4.3 Erection of buildings comprising 140 residential dwellings (Use Class C3) and a 477sqm (GIA) Community Hub (flexible Use Class F.1/F.2), ranging from two to five storeys together with associated accesses, car parking, cycle parking, hard and soft landscaping and associated infrastructure works. Granted on appeal.



Figure 5: Consented scheme (northern site in red line) showing relationship to Heath Clark South

24/00259/PRE – Current Pre-Application

- 4.4 Redevelopment of the site to deliver approximately 217 new residential dwellings and approximately 482sqm of non-residential floorspace (Use Class F.1/F.2), as well as private and communal amenity spaces, parking, cycle parking, enhanced public realm and landscaping, and relevant infrastructure works.
- 4.5 There have been 2 pre-application meetings to date. Both iterations of the scheme retained the same basic site layout as the consent however proposed amendments including turning some of the terraced housing blocks into 4-6 storey mansion blocks to increase the overall density of the site. As a result of on-going engagement with officers the quantum of homes has reduced from 217 to 210 units.

24/02907/ENVS – Environmental Screening (Not Required)

- 4.6 Environmental Impact Assessment (EIA) Screening Opinion request for up to 220 residential units and 440sqm (GIA) of flexible community floorspace (Use Class F.1/F.2), together with private and communal amenity spaces, parking, cycle parking, enhanced public realm and landscaping and relevant infrastructure works.

Proposal

4.7 The proposal has been amended during the course of on-going discussions. The current proposal is for the following:

- Redevelopment of the site to deliver approximately 210 new residential dwellings,
- Approximately 482sqm of non-residential floorspace (Use Class F.1/F.2),
- Private and communal amenity spaces,
- Parking, cycle parking, enhanced public realm and landscaping,
- Relevant infrastructure works.

4.8 The current proposed unit mix comprises:

Occupancy	Units	% Mix
One bedroom 2 person	74	35.2
Two bedroom 4 person	49	23.3
Three bedroom 5 person	87	41.4

5. DESIGN REVIEW PANEL FEEDBACK

5.1 Given the limited time between the Design Review Panel session on the 3rd October 2024 and the publication of this report to members, the feedback from the Panel will be addressed in an Addendum Report so members are aware of their thoughts on the scheme.

6 SUMMARY OF MATTERS FOR CONSIDERATION

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

- Principle of Development
- Design, Townscape and Heritage
- Impact on Adjoining Occupiers Living Conditions
- Mix and Quality of Accommodation Provided
- Highways and Transportation
- Environment
- Other Matters
- Mitigation

Principle of Development

Extant Planning Permission

6.2 As stated in the relevant planning history section above, the site benefits from an extant planning permission. This being 21/05865/FUL (hereafter referred to as the “2021 permission”). This was permission for:

- Erection of buildings comprising 140 residential dwellings (Use Class C3)
- 477sqm (GIA) Community Hub (flexible Use Class F.1/F.2)
- Buildings ranging from two to five storeys

- Associated accesses, car parking, cycle parking, hard and soft landscaping and associated infrastructure works.

6.3 Various images of the 2021 permission are below.



Figure 6: Site layout/ground floor plan of 2021 permission



Figures 7: North Elevation (onto Duppas Hill Road) of 2021 permission



Figure 8: East, South and West elevations of the 2021 permission

- 6.4 A material start on site has not been undertaken, however this 2021 permission is extant as planning permission was granted on appeal on the 28th November 2022. Therefore, this is a material consideration with regards this pre-application and the determination of any planning application in the future, setting the principle of a primarily residential scheme with a component of Use Class F.1/F.2.

Loss of School Allocation (Allocation Site 16)

- 6.5 The application site subject to this proposal is currently listed as a proposed allocation site, site number 16, in the Croydon Local Plan 2018. As set out above in paragraph 4.1, site 16 is subject to alterations as part of the Regulation 19 process and this would see the omission of the school allocation and an uplift in residential units from 62-128 to 266 homes across both the Heath Clark South and North sites. In the allowed appeal, Ref No 21/05865/FUL, the Inspector concluded,

This Inquiry heard more detailed evidence over the education needs for this allocation, than any provided to the Inspector examining the CLP. The PPG factors all point to there not being a realistic prospect of this site being developed for its allocated use. On the balance of probabilities, having considered the evidence provided, I consider there to be no reasonable prospect of Heath Clark North coming forward for the secondary school use allocated in the CLP.

- 6.6 As can be seen from the appeal decision and the emerging Local Plan Review (Regulation 19) the evidence associated with the school allocation was tested thoroughly as part of the appeal process. This appeal decision has informed the review of the Croydon Local Plan whereby the LPA are no longer proposing the school allocation on this site.
- 6.7 Notwithstanding, the applicant team has undertaken further research to establish whether there has been a change in the demand for school places. This research appears to demonstrate that there is no further demand and, in some cases, space

has become available in nearby schools due to migration out of the area. With this in mind, and given the extent permission which currently exists, the principle of non-provision of a school on site can be supported.

Residential Development

- 6.8 The Croydon Local Plan sets out a housing target of 32,890 homes over a 20-year period from 2016-2036 (1,645 homes per year). The London Plan requires 20,790 of those homes to be delivered within a shorter 10-year period (2019-2029), resulting in a higher target of 2,079 homes per year. The current housing target is therefore 2,079 homes per annum up to 2029.
- 6.9 Under the review of the Local Plan allocation site 16 is being amended to remove the school allocation but will see an increase in the allocation of homes from a range (62 – 128) to 266 homes. The 2021 permission, which was allowed on appeal, granted planning permission for the provision of 140 therefore the proposal now before members would see an uplift in this provision by 70 units; totally 210 homes. This would give a combined provision of 336 homes across both the southern and northern sites along Duppas Hill Road. The increase in the number of units would see better use of land within an established sustainable residential area and would contribute to the Councils housing targets.

Conclusion

- 6.10 In addition to the above, a balanced approach much be adopted as to developing land to maximise the delivery of new homes considering the extant consents and the omission of the school site allocation under the Local Plan Review. The provision of circa of 210 homes with associated facilities can be supported subject to wider considerations below.

Design, Townscape and Heritage

General

- 6.11 London Plan Policy D9 states that based on local context, Development Plans should define what is considered a tall building for specific localities, the height of which will vary between and within different parts of London but should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey. Full impact must be considered. Croydon Local Plan 2018 states that a tall building is a building that is 6-storeys high (25 metres) or which is significantly taller than its surrounding buildings.
- 6.12 Policies DM10 and DM49.1 (Waddon) of the Croydon Local Plan states that to enable development opportunities (including public realm improvements) are undertaken in a cohesive and coordinated manner while a masterplan approach would be supported. Proposals should follow a design code approach and such proposals will be considered for the area within Waddon's potential new Local Centre.
- 6.13 The site lies within the edge of the of the Five Ways character area as identified by the emerging Draft Purley Way Masterplan (flowing from DM49.1 above). The Draft Purley Way Masterplan identifies that the Five Ways character area has a role in providing 530 new homes and therefore the sites at Duppas Hill Road, both south

and north, are critical to helping to achieve the delivery of much needed homes. While the masterplan includes the school allocation to the north as discussed above this allocation is not being brought forward as part of the Local Plan review.

6.14 Officers do not have an in-principle concern in respect of increasing the residential quantum, however the detailed design needs further development. The site layout consists of 2 frontage blocks to Duppas Hill Road which are part 5, part 6 storeys. The applicant seeks to include community use at ground floor and residential accommodation above. The building line is set back to create a swale to address surface water flooding in this location while also providing a landscaped strip to help integrate the development into its park setting. As the existing pavement is narrow and abruptly ends, the Applicant has provided a secondary route through their site to Duppas Hill Park and a path which follows the pedestrian desire line to Waddon Station. The site layout broadly follows that of the consented 21/05865/FUL and is supported by Officers.

6.15 The consented scheme, 21/05865/FUL, had changing rooms as part of its community offer however the current spaces are undefined in terms of their exact use. Officers have pressed the applicant for further details but limited information has been provided. However, the applicant has confirmed that they will investigate what uses would be suitable versus the cost borne to future occupants to ensure this would not affect their affordability. The consented changing rooms for the park as previously secured are no longer proposed and this is accepted by the parks team as they were not required. The proposed community use would have a generous outdoor and/or spill out space which could complement future uses. Further design development will be required to ensure that any future community uses contribute to street activation, but their location and size, broadly following that of the consented 21/05865/FUL is supported.

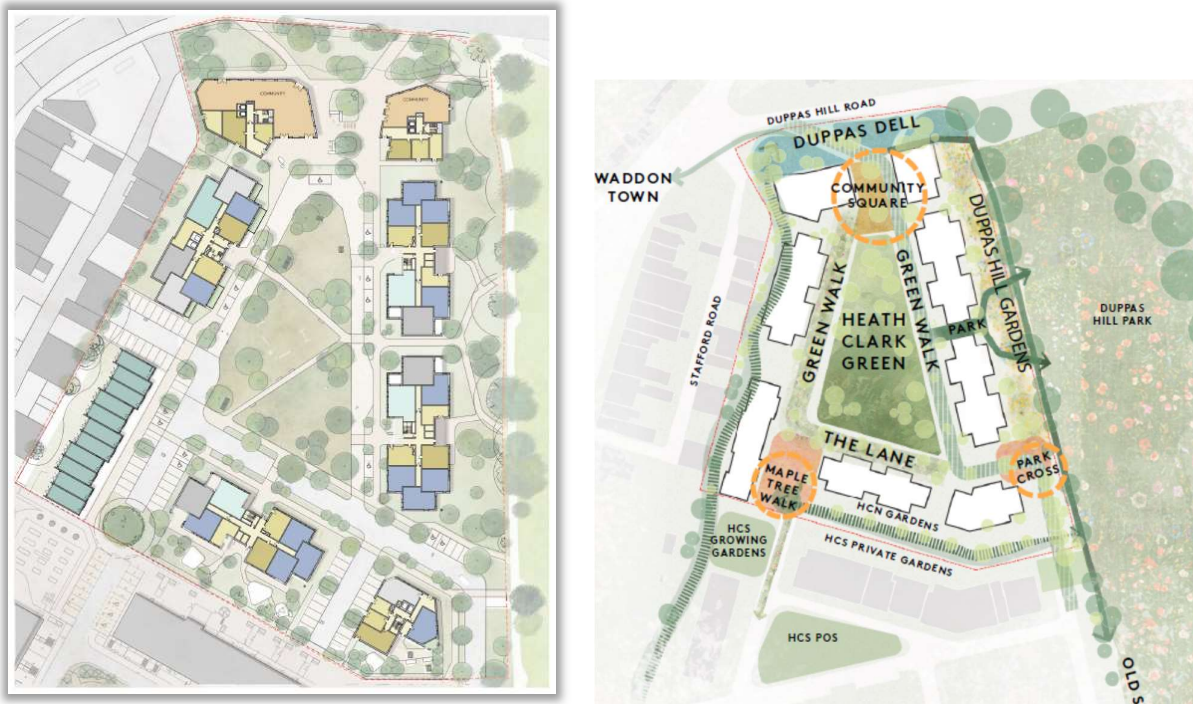


Figure 9: Proposed site layout

Proposed Ground Floor Plan

- 6.16 The proposed buildings are arranged around a central green which is similar to that which was granted at appeal under 21/05865/FUL. The green includes an underground attenuation tank to help alleviate flooding and some “playable” landscape features. The design and size of this space is broadly as per the extant permission however there have been some minor changes such as the reciting of the parking away from the edge of the green. In addition, the “road” around the green would have bollards to prevent ad-hoc parking and access and would only be for servicing, emergency vehicles and DDA parking spaces.
- 6.17 The Applicants have included a second pedestrian link between Heath Clark North and South to the South West corner of the site (Maple Tree Walk). This link is focussed around the retained Maple Tree which is the only tree of value within the site. The provision of a secondary route can be supported; however the actual qualities of the route should be further developed to ensure it has good passive surveillance and activation. Boundary treatments and ground floor use in this area will be critical.

Design and Massing Approach

- 6.18 The consented scheme 21/05865/FUL, included a mixture of flatted blocks and terraced housing. The 3-storey terraced housing to the Western boundary has been replaced with a part-3, part 4-storey mansion block (Block C on Figure 11 below). There is no in principle objection to this approach, however this needs to be tested in townscape views as it could be quite visible from the corner of Duppas Hill Road, given the low-rise nature of the surrounding context. This is an area where further testing work is needed.



Figure 10: Consented western elevation



Figure 11: Proposed 3D perspective (pre-application)

6.19 The Eastern edge is now 2 mansion blocks of 5/6 storeys, whereas before it was a mix of terraced housing and flatted typologies, which gave some modulation in height and scale. This area has a sensitive relationship to the Locally Listed Park and Officers have suggested the massing should be refined using views testing to ensure it does not read as a “wall of development” and that the gaps between buildings will still allow long range views through the site, helping to break the perception of mass from Duppas Hill Park.



Figure 12: Consented eastern elevation, with terraced properties interspersed between mansion blocks



Figure 13: proposed eastern 3d perspective, showing all mansion blocks

6.20 The northern frontage would provide the community use on the ground floor and marks the focal point from the north. The buildings to the north have a larger scale

and mass to signal the main pedestrian and cycle access into the site. Officers feel the elevations need further design development to ensure that the built form has a solid landing at the ground floor and does not detract from the architecture above. Further reference should be made to the local character and the applicant is advised to look at other brick colours to better integrate these buildings into its immediate context i.e. red brick Edwardian properties. Again, the landscaping and engineering solutions to the north need further exploration and design development to ensure that the building to the north do not become an island above the swale.



Figure 14: Consented northern elevation



Figure 15: proposed northern 3d perspective with an extra storey to Duppas Hill Road

6.21 In the current proposal, there are concerns that the footprints and heights of the different blocks are quite uniform, with little hierarchy or interest. Officers discussed exploring more variation in height and creating “gateways” at both the Northern and Southern approach to the site. The rationale for where height is positioned on the site is not clear and it appears that all blocks have been uplifted uniformly without an overarching strategy.



Figure 16: Visual from Duppas Hill Road, looking South towards the Central Green

6.22 There is a need to provide some form of buffer to the locally listed historic park and garden to protect this non-designated asset. The scheme responds to this through a landscape strategy of berms and additional tree planting to the eastern boundary. In the consent, the park edge was previously a formalized path the whole length of the boundary which meant that the buildings had a frontage both onto the central green and the park. The current design has three clearly defined rear access points to the Park and no north-south through route along this edge. Officers are of the opinion that is acceptable, but further interrogation is needed into the treatment of the park boundary. Secure by design principles will be explored further with the Metropolitan Police as the scheme evolves.

6.23 The southern part of the site has also changed from a mix of terraced housing and flatted typologies to 4/6-storey mansion blocks. This part of the design has recently changed in response to Officers comments and now appears much more successful, mainly with the parking area broken up and an emphasis on landscaping principles. The reduction in car parking to the southern approach is welcomed by Officers from a design perspective as this is one of the key routes into the site but will need to be balanced against the parking needs of the development.



Figure 17: Consented southern elevation, with terraces central

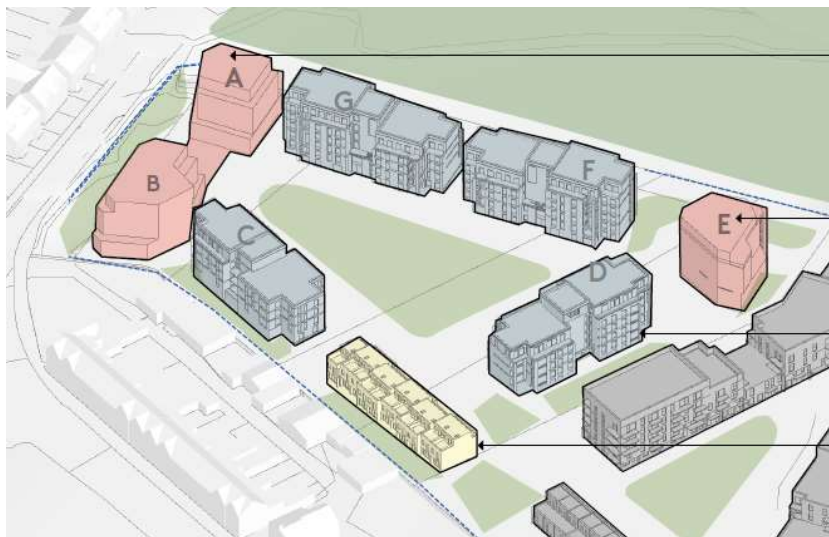


Figure 18: proposed southern 3d perspective, with mansion block (Block D) in place of terraced houses

6.24 Given that the Heath Clark site is now in one ownership (the Hyde Group acquired the north site more recently), the applicant has focused the contextual analysis on the Heath Clark South site. There are some common references in terms material palette, treatment of bases, cores and ribbed detailing in brick and concrete panels. This needs to be developed in much more detail to ensure the facades have sufficient architectural interest. The balcony strategy also needs to be better defined

as it is not fully clear which balconies are integrated, nor how privacy from within them can be maintained.

- 6.25 Officers have raised concerns about the blocks being the same but expressed in a different tone as this is quite a simplistic approach and somewhat monotonous. It was recommended that the design should be more nuanced and should take into account the blocks specific adjacencies and different functions within the wider masterplan for both the southern and northern sites. The applicant was encouraged to do a wider contextual analysis to inform the character of the gateway buildings on Duppas Hill Road to see how these can be differentiated either through their height or architectural expression. The views of Committee Members are welcomed in this respect.



Figure 19: Architectural Expression of Mansion Block

- 6.26 Generally the floor plans of the blocks are fairly efficient and well resolved, with a 100% dual aspect apartments, as defined by the London Housing Design Standard Guidance 2023. Refuse and cycle storage are integrated within the flatted blocks and separate stores provided for the community uses. Ground floor apartments will provide activation and passive surveillance to the central green, however further information is needed regarding boundary treatments and defensible space to ensure the privacy of future occupiers is protected.
- 6.27 The design of the townhouses is as per the consent. Care is needed to ensure continuity and harmony between the design of the houses and newer flatted elements. The layout gives a policy compliant mix with 40% family sized units. The Applicants intention is to deliver 100% affordable housing, although only 50% (if this is offered) can be secured through the planning permission. This is a key benefit of the scheme but has wider impacts in terms of parking etc. that require further interrogation and are not fully resolved in the current proposal.

Heritage

- 6.28 The 2021 permission considered that the proposed development did not harm the characteristics and setting of the locally listed historic park and garden. However, Officers have concerns over the scale and massing of the latest iteration of the proposal and its relationship to the park edge. During meetings with Officers the applicant is aware that further design development is required along the park edge and welcome the thoughts of members.

Impact on Adjoining Occupiers Living Conditions

- 6.29 Policy DM10.6 of the Local Plan states that the Council will ensure proposals protect the amenity of occupiers of adjoining buildings and will not result in direct overlooking into their habitable rooms or private outdoor space and not result in significant reduction of existing sunlight or daylight levels. Paragraph 6.80 of the Croydon Local Plan 2018 states that, *“a minimum separation of 18-21m between directly facing habitable room windows on main rear elevations is a best practice ‘yardstick’ in common usage and should be applied flexibly, dependent on the context of the development to ensure that development is provided at an acceptable density in the local context”*.
- 6.30 The impact upon all neighbouring properties were considered acceptable under application 21/05865/FUL and given that the layout is largely similar to the consented scheme similar impacts are expected. The revised scheme, while introducing additional circa 70 units is achieved through taller blocks and a change in the typology of units. The isolated nature of the site and the generous separation distances are not considered to give rise to a harmful loss of privacy and/or light that would lead to a different conclusion than that of the previous approval. The views of Committee Members in this respect would be welcomed.

Mix and Quality of Accommodation Provided

Mix

- 6.31 Croydon Local Plan 2018 policy SP2.7 sets a strategic target for 30% of all new homes up to 2036 to have three or more bedrooms. Policy DM1.1 allows for setting preferred mixes on individual sites via table 4.1. The application site has a PTAL rating range of between 4 (to the Duppas Hill Road frontage) to 3 centrally within the site and 1a to the south eastern edge. Given the surrounding development is classed as an urban location, the policy requirement is 60% (PTAL 1a and 3) and 40% (PTAL 4). Given the access to the site is from Duppas Hill Road, which is PTAL 4, that results in a 40% family requirement. The applicant proposes a mix of 40% 3 bedroom units, which meets the minimum requirement.

Affordable Housing

- 6.32 London Plan policy H4 and Local Plan Policy SP2.4 set a strategic target for 50% of homes delivered across London and across Croydon to be genuinely affordable, subject to viability. The Council is following the threshold approach to affordable housing as outlined in London Plan policy H5. Applicants must provide a minimum of 35% affordable housing on site to follow the fast-track route. Policy SP2.5 also sets out the minimum provision of affordable housing to be provided. This is set as 30% affordable housing to be provided on site. If this is not viable, on sites within the Croydon Opportunity Area, as a minimum, 15% is required to be provided on site, plus the simultaneous delivery of the equivalent of 15% on a donor site with a prior planning permission in addition to that sites own requirement. The Council seeks a 60:40 ratio between affordable rented and intermediate homes.
- 6.33 The applicant is proposing 35% affordable housing; subject to compliance with H5(c) of the London Plan on tenure split, other policy compliance and seeking grant, the scheme could follow the fast-track route.

Quality

- 6.34 The current proposal would provide a circa 210 homes and all units would be dual aspect, provided with private amenity space and all in accordance with the minimum space standards. There are some concerns in respect of the mutual overlooking between balconies however Officers are of the opinion that design solutions can be found to safeguard future amenities. The Mansion Blocks would for the majority be 9 units per core with one block being 5 units to a core with the terrace housing be directly accessed from the street level.
- 6.35 Daylight and sunlight analysis must be submitted to illustrate that all habitable rooms within the development achieve the minimum targets. This should assess the future occupiers' light receipt against the 2022 BRE Guidance. Given that all units are dual aspect, or triple aspect in some circumstances, with good levels of glazing Officers are comforted that the proposal could achieve adequate levels of daylight and sunlight, noting the previous scheme complied in this regard.
- 6.36 Landscaping plans have been provided and the applicant is working with Officers to demonstrate how communal amenity space and play space will be provided within the central green square. Discussions to date have focused on the green square, swale to the north and the eastern boundary with Duppas Hill Park.
- 6.37 Currently the applicant is proposing that under 5's/doorstep play will be provided within the central garden square. Play space for older children is unknown at this stage. However, given the adjacency to Duppas Hill Park should such not be achievable on site there is an opportunity for a financial payment for offsite provision, likely to improvements within Duppas Hill Park. Any off-site provision would need to show that a safe pedestrian route exists to reach this space and be considered in connection with the Council's needs.
- 6.38 The applicant is aware that housing should cater for residents' changing needs over their lifetime and that 10% of units would need to be wheelchair accessible and 90% adaptable. Appropriate facilities, furniture, storage and turning space must be demonstrated on the plan's come submission.
- 6.39 The applicant is aware that a fire statement will be required as part of any formal submission (D12 of the London Plan) and has advised that the buildings will be designed to meet current fire regulations.
- 6.40 The impact of noise and air quality on residential amenity will need to be considered, especially as the surrounding roads make up a busy part of the road network. The applicant will need to demonstrate how internal areas and external areas achieve an acceptable standard; accordingly, noise and air quality assessments are expected with any future application

Highways and Transportation

- 6.41 The site is situated in an area with good public transport accessibility level, ranging from 1a to 3 and 4 and is within a short walk of Waddon Train Station. The PTAL 4 is on the northern side of the site fronting Duppas Hill Road.
- 6.42 Vehicle access would be from the south via Old School Place. A previous iteration of the scheme (earlier in this pre-application process) showed an increase in parking around the site (100 car spaces at that time, compared to 67 now), but officers felt

this compromised the Landscape-Led design principle. The current version of the scheme provides 67 car parking spaces, of which 13 are DDA spaces. The current parking quantum gives a parking ratio of 0.3 to the North site, whilst a ratio of 0.7 was consented to the South site. By comparison, and a material consideration for an application, the 21/05865/FUL consent had 99 parking spaces, 12 of which were DDA spaces, equating to a ratio of 0.7.

6.43 A careful balance needs to be struck between the number of car parking spaces, the land take for them and environment it would create, against the public realm and landscaping that would be lost and potential for car parking pressures resulting. The two images below show the initial proposition and the latest iteration of car parking and open space/landscaping. Officers are keen to understand the thoughts of Members on this key issue and whether the appropriate balance has been struck.



Figure 20: site layout as submitted
100 spaces, but expanse of car parking areas



Figure 21: site layout as evolving
67 spaces, increased soft landscaping

Residential Parking

6.44 Given the sites accessible location the scheme could support a lower parking ratio than the maximum specified within the London Plan 2021. The maximum car parking based on the current mix would be 179.25, equating to a ratio of 0.85.

6.45 The applicant asserts that car ownership schemes in affordable housing is generally lower and given the good access to public transport a lower amount could be justified. Currently the proposed parking ratio is set at 0.3 spaces per dwelling for the northern site, which sees a 50% reduction from the 2021 permission (at 0.6 per dwelling). Transport for London has advised Officers that they are satisfied with a parking ratio of 0.3 for the northern site but Strategic Transport Officers of the Council have concerns over this reduction given localised parking pressure and/or knowledge of the wider area and are of the view a ratio closer to 0.5 is required.

6.46 The applicant sets out a blended target across both the North and South Heathclark sites at 0.5 spaces per unit. Officers have raised concerns regarding the revised parking ratio given the access to the south via Old School Place and likely pressures from additional on street parking. Further evidence needs to be submitted by the

applicant to provide comfort to Officers that adequate car parking can be achieved. To control parking within Old School Place, should the parking ratio be considered acceptable by members of the Committee and Council Officers, it is likely that a Controlled Parking Zone (CPZ) will need to be introduced along Old School Place. The implementation of such would be subject to separate legislation and there are no guarantees that such a CPZ could be introduced. Members views on the proposed parking ratio of a 0.3 for the north site with a combined 0.5 spaces per unit across both the southern and northern sites would be welcomed.

- 6.47 In addition to parking ratios, changes have been made to the location of the disabled bays around the green square with bays sited adjacent to the main footways. The relocation of the disabled parking bays can be supported as it would ensure that the parking area does not dominate the public realm. There are however concerns in regard to the turning area to the north in relation to delivery and servicing vehicles around the green. The layout and tracking of this area needs further refinement to ensure that the site can be adequately serviced.
- 6.48 In addition to the above future residents will be prohibited from applying for on-street parking permits (futureproofing were a CPZ introduced), thereby controlling parking availability and parking stress within the surrounding area. From an officer perspective more work is required on the parking ratios to come to an acceptable balance, striking a balance against mitigation proposed by the applicant such as car clubs.

Car Clubs

- 6.49 Car club spaces will be fundamental if a lower parking ratio is to be supported. The costs of providing this on site (or in the area) would be borne by the developer. Zip Car operates in the Croydon area and as such this demonstrates a demand for car clubs. In addition, membership for three years for all future occupiers could be secured within any legal agreement.

Cycle parking

- 6.50 The proposed development is seeking to include long stay and short stay cycle parking in accordance with the London Plan and London Cycling Design Standards (LCDS) requirements, for both the residential and non-residential uses proposed. A number of built-in cycle storage spaces have been shown at ground level and within buildings in various iterations of the scheme. At this stage the detailed storage capacity is not known, but the applicants have been made aware of the above requirements and have indicated their intention to meet them. Provision of larger adaptable bicycles (5%), as well as electric bicycles, must be incorporated.

Access/Serviceing

- 6.51 Serviceing is proposed up and around the green square and the south of the community uses. Further details would be secured as part of a S278 agreement with the Highways Team at the legal obligation stage. Subject to full details the access and serviceing arrangements appear appropriate for a site of this size and scale. In terms of refuse collection that would take place as per the serviceing arrangements around the green.

- 6.52 Details of the delivery and servicing strategy will be required at application stage, as well as construction logistics.

Mitigation

- 6.53 Mitigation will be fundamental if a lower parking ratio can be accepted, in order to promote more sustainable transport modes and avoid reliance on the car. Contributions (starting point being £1,500 per unit) towards improvements to sustainable transport will be required along with the restriction of access to parking permits in the nearby CPZ, car club provision / membership and EVCP infrastructure. Highway agreements will be required for all changes to the public highway and the adoption of widened footways and service bays, as well as upgrades to pavements and landscaping around the site.

Environment

Building performance

- 6.54 All major development, such as this, should be net zero-carbon in accordance with the London Plan energy hierarchy of Be Lean; Be Clean; Be Green and Be Seen. A minimum on-site reduction of at least 35 per cent beyond Building Regulations is required and if zero carbon is not met a cash in lieu contribution is required. Major development proposals should calculate and minimise carbon emissions from any other part of the development, including plant or equipment, that are not covered by Building Regulations, i.e. unregulated emissions.
- 6.55 The applicant has indicated that the proposal would be Net Zero Carbon which is welcomed however if such cannot be achieved the applicant has advised that offset payments would be secured as part of any legal agreement. Heat Risk needs to be managed and water consumption restricted as part of any proposal coming forward with full details capable of being secured via condition.

Flooding

- 6.56 The site is located within in a surface water and ground water flood risk area and is also subject to critical drainage flooding. In accordance with Policy DM25.1 and Table 8.1 of Croydon's Local Plan all development on sites at risk from other sources of flooding area required to run a sequential test and exception test.
- 6.57 A site-specific Flood Risk Assessment proportionate with the degree of flood risk posed to and by the development, taking account of the advice and recommendations within the Council's Strategic Flood Risk Assessment and Surface Water Management Plan, is required.
- 6.58 Subject to satisfying the above requirements and priority given to the provision of Sustainable Drainage Systems (SuDS) unless demonstrated to be inappropriate, the principle of residential development would be acceptable. This must be integrated into the development, such as the use of nature based SuDs in the public realm areas.
- 6.59 An initial Flood Risk Assessment and Drainage Strategy was submitted with the previous application, 21/05865/FUL and was considered proportionate to the development proposed. The applicants have engaged with the Lead Local Flood

Authority (LLFA) as a separate pre application process and discussions are on-going.

Air Quality

- 6.60 The whole of Croydon Borough has been designated as an Air Quality Management Area (AQMA). As indicated above, an air quality report will need to be submitted with any application. This must include how the ground floor residential units, amenity areas and balconies fronting the adjoining roads are suitable from an air quality perspective. Should the development increase air pollution or be located in an area subject to breaches then mitigation will be required.

Trees and biodiversity

- 6.61 The site is not subject to a Tree Preservation Order. There are a number of trees on the site boundaries and one prominent maple tree, but none are subject to formal protection.
- 6.62 Additional planting is proposed and must be an integral element of the design of the scheme and the overall public realm and landscaping strategy. Full details of the types of planting are required including types and species to ensure these are worthy replacements.
- 6.63 London Plan Policy G5 states that major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site. This scheme should achieve a target score of 0.4. Currently, the proposal is set to exceed the minimum target score with over 800sqm of green space.
- 6.64 The NPPF and London Plan Policy G6 require that any development provides biodiversity net gain. Such details will need to be worked through as the scheme progresses and must be integrated into the scheme. Full details will be required at application stage, including a Biodiversity Statement and Biodiversity Net Gain Assessment.
- 6.65 An Environmental Impact Assessment (EIA) Screening Opinion (24/02907/ENVS) was submitted prior to this presentation to members. The development was not considered to require an EIA, taking account of its location, nature, scale, and characteristics.

Other Matters

- 6.66 Both the NPPF and London Plan Policy seeks to create safe, secure and appropriately accessible environments where crime, disorder and fear of crime do not undermine the quality of environment. Any future application should be mindful of Secured by Design principles and improve natural surveillance / lighting of the area. Initial discussions have taken place with Metropolitan Police Designing Out Crime Officer for Croydon.
- 6.67 In line with Policy DM16 of the Croydon Local Plan (2018) a health impact assessment will need to be submitted with the planning application.

Mitigation

6.68 At this stage it is envisaged that planning obligations will be required to mitigate the impacts of the development. Discussions are progressing in relation to the Heads of Terms, but it is anticipated that these would include the following (this is not an exhaustive list):

- Affordable Housing (on-site)
- Affordable housing review mechanisms (early and late stage)
- Employment and training contributions and obligations (construction/operational)
- Air Quality contribution
- Zero carbon offset (if required)
- Sustainable transport contributions
- Car parking permit restrictions
- Car club provision and membership (3 years free)
- Travel Plan
- Public realm delivery and maintenance including allowing the public to pass and re-pass within the public realm areas
- Highway works including loading bays and footways
- Retention of scheme architects
- Relevant monitoring fees

7 SPECIFIC FEEDBACK REQUESTED

7.1 In view of the above, it is suggested Members focus on the following issues:

1. Principle of an increase in homes from the permitted 140 to the proposed 210;
2. Amount and distribution of scale/bulk/height across the site, including the context of the adjoining non-designated heritage asset (Duppas Hill Park);
3. Design approach, specifically whether the simple design is appropriate or whether it requires further refinement and individuality;
4. Approach to car parking provision (with the current iteration ratio of 0.3 spaces per home) balancing this against public realm and landscaping, as well as location and servicing arrangements.

8 PROCEDURAL MATTERS

8.1 The proposed development exceeds the 150 home threshold of the Greater London Authority (GLA) Order 2008 and as such will be referable to them when a formal planning application is submitted. No meetings are currently set up with the GLA, but Croydon officers would encourage such dialogue and would be happy to attend.