

PLANNING STATEMENT

LAND ADJACENT TO ACADEMY GARDENS

Full Planning Application for Residential Development

SUBMITTED ON BEHALF OF BRICK BY BRICK (CROYDON) LTD
DECEMBER 2016

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1 INTRODUCTION

Summary

- 1.1 This Planning Statement has been prepared by Carter Jonas LLP ('Carter Jonas') in support of a full planning application made to the London Borough of Croydon ('Croydon Council') for the "Erection of a three-storey building comprising nine flats together with landscaping and other associated works" ('the Site').
- 1.2 The principal purpose of the Planning Statement is to test the compliance of the proposals for residential development against prevailing national and local planning policy guidance.

Structure of Planning Statement

- 1.3 The sections of this Statement are structured as follows:
 - **Section 2 – Brick by Brick (Croydon) Limited:** describes the Applicant and the approach to the Smaller Sites Programme.
 - **Section 3 – Site Context:** describes the site location, site features and its planning history.
 - **Section 4 – Application Proposal:** provides a summary of the key components of the proposed development.
 - **Section 5 – Pre-Application Engagement:** summarises Brick by Brick's approach to pre-application engagement with Croydon Council planning officers and the local community.
 - **Section 6 - Planning Policy Context:** provides an overview of the planning policy documents and guidance notes relevant to Croydon Council's determination of the full planning application.
 - **Section 7 - Assessment of the Proposals:** assesses the proposed development's compliance with relevant planning policy and guidance.
 - **Section 8 – Affordable Housing Assessment:** provides site specific justification for the affordable housing strategy of the Proposed Development and its relationship to the tranches of housing within the Smaller Sites Programme.
 - **Section 9 - Summary and Conclusions:** provides key conclusions and an overview of the planning case for the proposed development.

2 BRICK BY BRICK (CROYDON) LIMITED

The Applicant

2.1 This section of the planning statement introduces Brick by Brick and explains the relationship between it and Croydon Council, introduces the total portfolio of sites that is being brought forward for redevelopment / development now, and finally sets the proposed redevelopment of the site adjacent to Academy Gardens within the overall context of the redevelopment portfolio.

Croydon Council & Brick by Brick (Croydon) Limited

2.2 Croydon Council has set itself an ambitious corporate target to ensure that across the borough and across the public and private sectors, 1,900 new homes will be started each year over the next five years. Croydon Council recognises that it will need to take a direct role in delivery if these ambitious figures are to be realised.

2.3 In order to maximise its contribution towards meeting this objective, the Council has committed to making best use of publicly owned land within its control to help deliver new housing.

2.4 Croydon Council identified a number of possible sites / properties for redevelopment and commissioned an initial feasibility study of their development potential. Alongside this study, the Council established its own development company – Brick by Brick (Croydon) Limited – to submit planning applications and secure development on the identified sites.

2.5 Brick by Brick is a private, independent company, with the Council acting as sole shareholder. Its purpose simply is to deliver high quality, new, residential-led development on a range of Council-owned sites across the borough. As well as being able to make sure the borough fully benefits from land value uplift and development returns, Brick by Brick will be able to deliver directly and act quickly to new opportunities in the market place.

2.6 A further benefit of this approach is that the full value of development growth is kept in the borough – whether it be in the form of additional affordable housing, physical improvements in local centres or dividend return to the Council to fund services.

2.7 The intention is for Brick by Brick development activity to directly benefit local communities. For example:

- The programme will create much needed new homes of a variety of tenures and priority will be given to local residents through the sales and/or letting process.
- For schemes delivered by Brick by Brick which include an affordable housing component, consideration is being given as to whether the affordable housing should be owned in the long term by the Council (within the housing revenue account), a Council owned Registered Provider (e.g. Croydon Homes) or another registered provider. This will be agreed on a case by case basis as the

detailed applications for schemes come forward on individual sites and will be dealt with in the terms of disposal between the Council and Brick by Brick.

- Where community facilities exist on the sites to be developed, these will be replaced with new, purpose built facilities which address local need.
- Where public car parking exists on the development sites, the new schemes will include new parking facilities

2.8 Brick by Brick was constituted formally by the Council with the stated objective of submitting planning applications for all of the first sites in 2016 and occupation of the first homes targeted for late 2017 / early 2018.

2.9 Its project teams have been working throughout 2016 towards the submission of the first planning applications in November 2016.

Portfolio of sites & batches

2.10 At a Cabinet meeting on 20th June 2016, Croydon Council confirmed the transfer of sites to Brick by Brick to allow the programme to proceed. The site adjacent to Academy Gardens was included in this transfer.

2.11 The decision was based on the assumption that in this first phase of development, a total of 1,020 units will be submitted for planning approval of which 474 will be affordable. Approximately 20% of all new homes will be 3 bed homes or larger. This equates to 46% affordable housing provision by unit number and this meets the Council’s stated objective that the development of the portfolio should achieve the stated London Plan objective to ‘*maximise affordable housing provision*’ (London Plan Policy 3.11) and is consistent with the Council’s own policy ambition to negotiate to achieve ‘*Up to 50% affordable housing provision on sites with ten or more units*’ (Policy SP2.4).

2.12 The overall split between market and affordable housing within the entire portfolio, and also the split between affordable rent and shared ownership, is set out in the tables below:

Tenure Split	Units	%
Private	522	53.8%
Affordable	474	46.2%
TOTAL	1,026	100%

Affordable	Units	%
Shared ownership	310	65.4%
Rent	164	34.6%
TOTAL	474	100%

- 2.13 Croydon Council has noted that over the period 2011-2015, only 23% of all new homes were affordable, and this was in part the justification to form Brick by Brick with a commitment to maximise the delivery of affordable homes. No other London Borough has such an ambitious and clear policy commitment, or has taken such direct action.
- 2.14 Given the number of sites involved and their complexity, it was never going to be possible for a single planning application to be submitted for separate sites, and it was accepted early on in the process that each site would be the subject of a separate application. After careful consideration, and as agreed with Croydon Council's planning team during the pre-application process, it was agreed that the portfolio would be divided into at least three batches, with each site the subject of separate application.
- 2.15 It was agreed also that inevitably the batches will not be of equal size or tenure, and therefore between the batches there will be minor differences in tenure, including shared ownership and socially rented. This is inevitable simply because of the need to try and geographically allocate the market housing and the affordable housing across the borough.
- 2.16 It also became apparent that on the smallest sites – less than 10 units - that it was not a policy requirement to develop mixed tenure. It was also not practical or viable to do so.
- 2.17 It became clear therefore that a flexible approach would need to be taken considering the portfolio as a whole, and then to place each batch and each site within this. Croydon Council is content that the tenure of the smaller sites should be brought into consideration as part of the assessment of the portfolio as a whole, and therefore it is proposed that within each batch, all of the applications would be determined at the same time and a s106 agreement would link all of the applications within that portfolio to control tenure (and any other obligations).
- 2.18 It was agreed that the second tranche would comprise 13 schemes to deliver 216 dwellings, with 95 affordable which is 44% of the total and 23 of these are affordable rent (24%). This is set out below:

	Units	%
Private	121	56%
Affordable	95	44%
TOTAL	216	100%

Affordable	Units	%
Shared ownership	72	76%
Rent	23	24%
TOTAL	95	100%

2.19 The proposal at the Site will provide nine units for market sale. The delivery of private units on this site facilitates the delivery of affordable units on alternative sites within the Borough to help optimise the affordable housing offer.

3 SITE CONTEXT

SITE LOCATION

- 3.1 The Site is located in the ward of Addiscombe within the London Borough Croydon.
- 3.2 The Site is formed of a linear strip of land situated between properties fronting onto Academy gardens and Lower Addiscombe Road and to the rear boundaries of properties fronting onto Nicholson Road. A pedestrian footpath currently runs through the linear strip of land linking Lower Addiscombe Road to Academy Gardens.
- 3.3 Bus services are located a short walking distance away on the A222 (Lower Addiscombe Road). Regular bus services operate to Croydon Town Centre, Purley, Norwood Junction, Elmers End and North Bromley.
- 3.4 East Croydon train station is located approximately 1.6 km from the site, which equates to a 20-22 minute walk. The train station provides services to London Bridge and London Victoria. The site has a Public Transport Accessibility Level (PTAL) rating of 3/4.
- 3.5 The Site is within 620 metres of Addiscombe Recreation Ground. This recreational ground provides access to a variety of outdoor amenity spaces, sports facilities and a children's playground.
- 3.6 The Site is located in a predominantly residential area, with surrounding residential buildings varying between two and eight storeys in height.
- 3.7 The Site is located within Flood Zone 1.

SITE DESCRIPTION

- 3.8 The Site comprises a linear strip of land that is 1,531 sq. m in total size.
- 3.9 The Site is situated to the east of no.60 Academy Gardens on a flat piece of land. The site is predominately turfed with a number of trees situated within it. A concrete footpath situated towards the western boundary runs through the site linking Lower Addiscombe Road to Academy Gardens. A four storey residential block is situated to the north of the site, two to four storey residential properties are located to the east, green space is situated to the south, an eight storey residential block is situated to the south west and a row of two-storey residential properties (the closest being no.60 Academy Gardens) situated to the west of the site.

DESIGNATIONS

- 3.10 There are no site specific policy designations.

PLANNING HISTORY

- 3.11 There is no relevant planning history on the site.

4 APPLICATION PROPOSALS

- 4.1 This section describes briefly the proposal as full details are provided in the Design and Access Statement. The description of development is

““Erection of a three-storey building comprising nine flats together with landscaping and other associated works”” (‘the Site’).

- 4.2 The development will provide nine flats. All nine flats are one bedroom, two person units. The three ground floor flats all feature their own front doors, one of these ground floor flats is wheelchair accessible. All units will be available for private sale.
- 4.3 The development will be accessed from Academy Gardens with the balconies and primary windows fronting west towards the side elevation of no.60 Academy and south towards Lower Addiscombe Road overlooking green space. Minor non-habitable room windows are proposed to the rear (east-facing) elevation. This proposed layout will create active frontages providing surveillance to the pedestrian route between Lower Addiscombe Road and the Academy Gardens, whilst respecting the privacy of neighbouring residencies.
- 4.4 Both the main entrance and the private entrances to the ground floor flats are accessed via the re-configured pedestrian footpath that runs between Lower Addiscombe Road and Academy Gardens.
- 4.5 The proposals will provide a secure courtyard for bicycle storage to the six upper floor flats, with additional landscape features surrounding the building. Boundary hedges will also be utilised to articulate private and public spaces and to create defensible zones around the development.
- 4.6 The cycle storage has been provided for each new ground floor unit in their own dedicated rear garden spaces to the rear of the building in accordance with London Plan requirements. The development also includes two cycle visitor spaces.
- 4.7 The refuse store is situated on the ground floor facing the pedestrian footpath with level access. The capacity of the refuse store, as well as the type, dimensions and space requirements of the bins provided have been informed by Croydon Council Waste and Recycling in Planning.
- 4.8 The bins and bike stores and the servicing have all been located as to avoid impact on the streetscape.
- 4.9 The development is proposed to be car free, therefore no on-site car parking provision is provided.

DESIGN

- 4.10 The Design and Access Statement submitted as part of this application sets out the design proposals in detail.
- 4.11 In summary, the design proposes a simple and refined façade treatment that exploits the familiar and robust qualities of brick in order for the design to be both distinctive and sympathetic to the residential context.
- 4.12 The use of varying brick tones draws upon the existing range of colours that are found within the surrounding residential character. This brick palette has been developed to unify the different blocks as a legible neighbourhood. The balustrades to the balconies seek to recede and do not compete with the proportions of the brickwork openings.
- 4.13 Generous openings of regular proportions are carefully placed across the three storey brickwork façade to ensure maximum levels of daylight and sunlight in to dwellings. The deep reveal to the windows adds to the elevational relief and vertical shadow techniques used to articulate the building.
- 4.14 The roof lines aims to achieve a domestic and traditional feel with a contemporary approach.
- 4.15 Inset balconies provide interest and depth at the corners of the building, which are visibly prominent on approach. The inset balconies create a strong pattern and rhythm to building frontages.

LANDSCAPE STRATEGY

- 4.16 The Design and Access Statement also sets out in detail the Landscape Strategy for the Site.
- 4.17 In summary the landscape proposals provide a better footpath link between the proposed and existing building in conjunction with a new under 5's doorspace play area and generous front gardens to the development. The proposed landscape surrounding the new block provides a setting for the new building as well as embedding it within the context of neighbouring properties and improving the quality of their existing shared and communal spaces.
- 4.18 The new front gardens will contain semi mature trees to create a light green screen between the proposed and existing buildings.

5 PRE-APPLICATION ENGAGEMENT

- 5.1 The initial meeting was held at Croydon Council's offices on 7th June 2016. The purpose of the initial meeting was to establish whether the principle of development was acceptable and to inform the planners of the local context of the Site and its surrounding area as well as first principles around form, scale, mass and siting of the Proposed Development.
- 5.2 Feedback from the first pre-application meeting was broadly supportive of some development but planning officers voiced some concerns in relation to the siting of the four storey building set towards Grant Place, which has since been omitted from the proposed scheme.
- 5.3 Detailed minutes of the meeting were taken and sent to the planners for them to add their additional comments. These were then used as a formal record of meetings as opposed to the planners providing a separate report.
- 5.4 Two further pre-application meetings were held on 9th August and 23rd September and these, along with the community engagement have helped to inform the final scheme. A number of meetings between Carter Jonas, the Arcadis consultant team and other Croydon Council departments have taken place throughout the design process to help ensure Brick by Brick's proposed developments meet and adhere to Croydon Council policy, technical standards and best practice requirements.

PUBLIC ENGAGEMENT

- 5.5 Occurring alongside the pre-applications meetings, the proposals have also undergone extensive pre-application engagement by the Community Engagement Consultants, NewmanFrancis.
- 5.6 In summary, Croydon Council sent a letter on 22nd and 23rd June 2016 to 345 properties within a 50m radius of the proposed development site. The letter described the initiative to develop new homes in Croydon and introducing the developer Brick by Brick Ltd and providing information on the community engagement service to be provided by NewmanFrancis.
- 5.7 This was followed up by a letter from NewmanFrancis on 25th and 26th June to the same 345 properties inviting local residents to an engagement event to hear about the proposals for developing new homes on the site, and as an opportunity to offer comments and views and thereby for local feedback to influence the design.
- 5.8 An engagement event was held on 5th July, at the Methodist Church, 114 Lower Addiscombe Road, CR0 6AD where interested residents had the opportunity to review the proposals and ask questions to NewmanFrancis, Brick by Brick and HTA the architects. The event was attended by 11 people.
- 5.9 67% of all completed residential surveys were supportive of the scheme. The residents were interested in any environmental improvements which could improve the landscaping and play provision within the area. However

the remaining 33% of respondents were unsupportive of the scheme and raised concerns on car parking and GP service pressures.

- 5.10 Many residents raised concerns with existing problems on the estate including anti-social behaviour, maintenance or existing buildings and fly tipping.
- 5.11 In summary, pre-application advice from planning officers and engagement with the local community have had a significant effect on helping to positively shape and influence the final proposals.

6 PLANNING POLICY CONTEXT

- 6.1 Section 38(6) of the Planning & Compulsory Purchase Act 2004 requires that the determination of planning applications must be made in accordance with the Development Plan unless material considerations indicate otherwise.
- 6.2 The development plan in this case is comprised of the following:
- The London Plan (incorporating MALP, adopted March 2016)
 - Croydon Local Plan: Strategic Policies (adopted April 2013)
 - Saved Policies of the Croydon Unitary Development Plan (2006)

London Plan

- 6.3 The London Plan is the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. Local Plans prepared by London boroughs must be in general conformity with the policies contained within the London Plan.
- 6.4 The London Plan has set a minimum housing target for the London Borough of Croydon of 1,435 new homes per annum between 2014/15 to 2024/25.

Croydon Local Plan: Strategic Policies

- 6.5 Croydon's Local Plan: Strategic Policies (CLP1) sets the strategic vision, context and policies for the borough up to 2031. It contains high level policies on housing, employment, community uses, urban design, heritage, the environment together with specific place-making strategies for the wards in the borough.
- 6.6 One of the key strategic objectives of the CLP1 is to provide a choice of housing for people in socially-balanced and inclusive communities in Croydon. In order to do so, the Council will apply a presumption in favour of sustainable development of new homes provided applications for residential development meet the requirements of applicable policies of the Development Plan.
- 6.7 In order to provide a choice of housing for people in Croydon, Croydon Council will seek to deliver a minimum of 13,300 homes between 2011 and 2021 (1,330 per annum) and a further 6,900 between 2021 and 2031 (690 per annum) of which they will negotiate to achieve up to 50% affordable housing provision of sites with ten or more residential units.

Croydon Replacement Unitary Development Plan (RUDP)

- 6.8 The Croydon Replacement Unitary Development Plan (RUDP) was adopted in 2006 with the aim to retain and enhance that which makes the borough a pleasant and prosperous place and a borough in which people want to live and work.
- 6.9 The adoption of the CLP1 in 2013 resulted in the replacement of a number of UDP policies. However, many of the detailed policies within the UDP are saved and used to inform decision on planning applications until replaced by those within Croydon Local Plan: Detailed Policies and Proposals (CLP2) is adopted (see para 6.25).

Material Considerations

- 6.10 There are a number of other relevant documents that will be considered material in the determination of the planning application and these are set out below.

The National Planning Policy Framework (March 2012)

- 6.11 The National Planning Policy Framework (NPPF) was published on 27th March 2012 and it sets out the Government's planning policies for England and how these are expected to be applied.
- 6.12 The NPPF seeks to boost significantly the supply of housing land and states that Councils should approve development proposals that accord with the development plan without delay (paragraph 14).
- 6.13 The NPPF also states *'pursuing sustainable development involves seeking positive improvements in the quality of the built ... environment, as well as in people's quality of life'* (paragraph 9).
- 6.14 The NPPF seeks to ensure that plans and decisions take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas (paragraph 10).
- 6.15 The NPPF also sets out 12 core land-use planning principles which should underpin decision taking. These include the principle to *'proactively drive and support sustainable economic development to deliver homes, businesses and industrial units, infrastructure and thriving places that the country needs'* and *'promote mixed use developments'* and *'conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations'* (paragraph 17).
- 6.16 Paragraph 50 advises that where LPAs have identified that affordable housing is needed, they should set policies for meeting this need on site and identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand.

The National Planning Practice Guidance

- 6.17 The National Planning Practice Guidance (NPPG) website was launched on 6 March 2014. It replaces and consolidates 7,000 pages of planning guidance on topics including flood risk, heritage and design and it should be read in conjunction with the NPPF.

Croydon Local Plan: Strategic Policies: Partial Review: Proposed Submission

- 6.18 Croydon Council is currently in the process of partially reviewing CLP1 to reflect the revised London Plan (March 2016), which has increased Croydon's housing requirements and the need to review 'Tier 2' strategic employment locations. The Partial Review (CLP1.1) includes updated evidence on employment policies, community facilities and a move from Local Areas of Special Character to Local Heritage Areas.
- 6.19 The Proposed Submission version was published on 5 September 2016 and the public consultation runs to 17 October 2016.
- 6.20 The Croydon Local Plan Partial Review is anticipated for adoption in late 2017. At that point the Croydon Local Plan: Strategic Policies would have less than 15 years life left (as the Strategic Policies only extend to 2031). It is a plan making requirement for the Council to have a 15 year up to date strategic plan to sit alongside the Croydon Local Plan: Detailed Policies and Proposals, which is being produced to the same programme as the Croydon Local Plan: Strategic Policies - Partial Review.
- 6.21 In addition, the Mayor of London has adopted the London Plan 2016, which increased the borough's housing requirement from 1,330 per annum to 1,435 per annum. Adoption of this requirement by the Mayor has rendered the existing housing requirements in the Croydon Local Plan: Strategic Policies obsolete. This combined with the importance of extending the life of the Croydon Local Plan: Strategic Policies gave rise to the need for the Croydon Local Plan: Strategic Policies - Partial Review.
- 6.22 The primary focus of this Partial Review is the revision of Policy SP2 (Homes) to reflect the Further Alterations to the London Plan and updated evidence on the need for homes, Gypsy and Traveller pitches and affordable housing.
- 6.23 The Croydon Local Plan: Strategic Policies - Partial Review also provides an opportunity to update a small number of other policies to reflect new evidence and how the Croydon Local Plan: Strategic Policies have operated since adoption in April 2013.

Croydon Local Plan: Detailed Policies and Proposals: Proposed Submission

- 6.24 Simultaneously to the Partial Review of CLP1, Croydon Council are also in the process of producing the second part of their Local Plan. The Croydon Local Plan: Detailed Policies and Proposals (CLP2) will provide detailed

policies and allocations that will replace the remaining saved policies in the UDP. CLP2 supplements the adopted Strategic Policies that sets the strategic vision, objectives and policies. CLP1.1 and consequently CLP2 will support the Council's Growth Zone and Community Strategy through enabling sustainable and necessary growth, opportunities and infrastructure.

- 6.25 CLP2 will help to deliver increasing housing supply through sustainable growth; building more affordable homes; facilitating employment and economic growth; a focus on District and Neighbourhood Centres as well as the Croydon Opportunity Area; and increased emphasis on culture up to 2036.
- 6.26 A Proposed Submission version of CLP2 and draft policies map was published on 5 September 2016. The formal public consultation concludes on 17 October 2016. Adoption of CLP2 is anticipated in late 2017.

The London Housing Supplementary Planning Guidance (March 2016)

- 6.27 This Supplementary Planning Guidance (SPG) provides guidance on the implementation of housing policies in the 2015 London Plan and the 2016 Minor Alterations to the Plan (MALP). It provides updated guidance on a range of strategic policies including housing supply, residential density, housing standards, build to rent developments, student accommodation and viability appraisals.

Other Material Considerations

Supplementary Planning Documents and Guidance

- 6.28 The following Supplementary Planning Documents (SPDs) and Supplementary Planning Guidance (SPGs) have been adopted by Croydon Council:

SPD 2: Residential Extensions and Alterations Guidance

- 6.29 This SPD provides guidance to ensure that extensions and alterations made to residential buildings in Croydon are of the very highest design quality.

SPD 3: Designing for Community Safety

- 6.30 The guidance for "Designing for Community Safety" will be used in the assessment of planning applications by Croydon Council. Proposals which do not, without good reason, embody the principles described are likely to be refused planning permission as conflicting with Policy UD6 Safety and Security.

SPG12: Landscape Design

- 6.31 The guidance was intended to promote higher standards in landscape design.

SPG 17: Sustainable Surface Water Drainage

6.32 This SPG was prepared by Croydon Council to update and supplement the UDP policies and provide detailed practical guidance on their implementation.

7 ASSESSMENT OF THE PROPOSALS

- 7.1 This section provides an assessment of the Proposed Development against the relevant planning policies at National, Regional and Local Level. It provides the principle planning justification for the Proposed Development, along with summaries of the key planning considerations and detailed issues. Where the assessment refers to detailed technical issues such as ecology or daylight/sunlight, the section should be read in conjunction with the relevant specialist report accompanying the application.
- 7.2 The main planning issues raised by the Proposed Development are:
- Land use – local open land and housing development
 - Scale, mass and design
 - Impacts on adjoining and surrounding occupiers
 - Car parking and sustainable travel
 - Trees and landscaping
- 7.3 The Proposed Development is appraised below under each heading separately. It is important to note that although the application is submitted for determination on its own, as agreed with Croydon Council, it is necessary in some instances to have regard to other schemes within the same tranche.

LAND USE POLICIES – LOCAL OPEN LAND

Relevant Planning Policy

- 7.4 The NPPF at paragraph 76 sets out that local communities should identify special protection of green areas of particular importance by designating land as Local Green Space through neighbourhood or local plans.
- 7.5 UDP Policy RO8 Protecting Local Open Land states that sites that are too small to show clearly on the Proposals Map (less than 0.25 hectares) may still make a valuable contribution and will be treated as Local Open Land if they meet one or more of the designation criteria set out in the list. These sites will be considered on their own merits, however, most small sites fall in to six broad categories. One of these categories is amenity land laid out in public and private housing estates which could be used for valuable functions such as amenity, sports, and recreation or kick-about areas. It is considered that the site falls into this category.
- 7.6 UDP Policy RO8 sets out development on Local Open Land will not be permitted unless:
- There is a replacement or extension of existing facilities; and

- It does not harm the open character of the land; and
- It does not harm residential amenity.

7.7 The following paragraphs will assess the Proposed Development meets the tests of this policy.

Assessment

- 7.8 First, in terms of replacement or extension, the Proposed Development seeks to develop on a small area of amenity space resulting in a net loss of circa 248 sq m of a site measuring 1,531 sq.m (0.15 hectares). Although the amenity land is not replaced elsewhere, the remaining green open space will benefit from significant improvements with the addition of an under 5's informal play space measuring 130 sq m which incorporates natural play apparatus to the south of the site. This doorstep play can be used by existing and future residents in the nearby vicinity.
- 7.9 Although in strict assessment terms the Proposed Development does not comply with the test in terms of replacement or extension it has been demonstrated that a significant amount of open space will be retained and its quality significantly enhanced in visual and residential amenity terms. Therefore the new and improved amenity provision is considered sufficient to outweigh the small loss of amenity land.
- 7.10 Secondly, in terms of harm to the open character of the land, the linear strip of open space sits between a number of buildings. The land as existing could not be said to add much to the character of the area from an open space perspective. It is also prudent to note that within close proximity of the site is the Addiscombe Recreation, together with other areas of open space adjacent to Academy Gardens. Due to the size of the development and the other elements of open space within close proximity of the site which add much more to the character of the area than the Site. The proposal therefore complies with the second criteria.
- 7.11 Third, in terms of residential amenity, the value of the open space as it currently stands is of moderate value and appears to be underused. At the community engagement event, residents stated that the existing communal space is mainly used as a cut through from Lower Addiscombe Road and isn't particularly well used or highly esteemed. Furthermore the space suffers from a lack of identity and surveillance, the building will make this area more welcoming for occupiers of Academy Gardens to use at night due to the surveillance of the space. Improvements to the quality of the existing green space will improve the amenity experience for future and existing residents. The Proposed Development therefore complies with the third criteria.
- 7.12 On balance, the Proposed Development satisfies two out of three of the Local Open Land tests. Although the Proposed Development does not fully accord as a very small amount of amenity space is lost, this is offset by the benefits of providing much need housing together with the improvements to the quality of the existing landscaping to the green open space and new informal play space. In light of the above the Proposed Development complies with Policy RO8.

LOCAL USE POLICIES – PRINCIPLE OF HOUSING DEVELOPMENT

Relevant Planning Policy

- 7.13 The NPPF Chapter 6 ‘Delivering a wide choice of quality homes’ states that housing applications should be considered in the context of the presumption in favour of sustainable development. It also sets out that local planning authorities should deliver a wide choice of sustainable homes and plan for a mix of size, type and tenure of accommodation to meet the specific need to the area.
- 7.14 London Plan Policy 3.3 Increasing Housing supply sets out the housing target for London Borough of Croydon at 1,435 new homes per annum. The policy together with Policy 3.4 provides clear direction for boroughs to maximise the supply of housing by taking into account local context and character and optimising urban sites particularly where there is a good transport accessibility.
- 7.15 London Plan policy 3.8 Housing Choice states that new development should offer a range of housing choices in terms of mix and housing sizes and types.
- 7.16 CLP1 Policy SP2.2 Homes: Qualities and Location sets out that Croydon Council will seek to deliver 20,200 new homes over the plan period with this figure increasing to 31,850 in the emerging CLP1.1 Partial Review. SP2.2 continues that this will be achieved by concentrating development in the places with the most capacity to accommodate new homes whilst respecting local distinctiveness. The emerging CLP1.1 builds on this further by recognising that in order to meet the housing need, Places will change and in particular, suburbs will sustainably grow.
- 7.17 CLP1 Policy 2.5 Mix of Homes by Size states that the council will seek to ensure that choice of homes is available setting a strategic target for 60% of all new homes outside the Croydon Opportunity Area up to 2031 to have three or more bedrooms.
- 7.18 UDP Policy H2 Supply of New Housing sets out that housing will be permitted within the existing built up area where the character of the area is not harmed and protected uses are not lost.

Assessment

- 7.19 The Proposed Development will deliver nine flats in the built up area of Addiscombe. The Site and the surrounding area is residential in character and although the Site has not been previously developed, it lends itself to sensitive infill development and assist with creating sustainable communities as the Site is located in close proximity to Addiscombe’s local amenities. There are no known protected uses on Site.
- 7.20 The Proposed Development has been developed through an analysis of the existing wider area, having taken inspiration from nearby housing forms, orientation and topography to help develop a bespoke linear residential block. The development seeks to complement the existing character, using a modern architectural style to reduce the impact on built form on adjacent existing occupiers, whilst ensuring efficient use of development

land, a key principle within the NPPF. The density of the Proposed Development is 59 units per hectare (118 habitable rooms per hectare) which falls slightly below with the London Plan Density Matrix. This is because of the linear constraints of the site and the desire to retain part of a grassed amenity space and selective trees. The retained communal amenity space will be improved through new planting and informal play areas to help improve the usability of the space.

- 7.21 The Proposed Development within the Site was supported in principle by Croydon Council planning officers at pre-application meetings on 9th August and 23rd September. In light of the above paragraphs, the Proposed Development complies with UDP Policy H2. The provision of housing assists with meeting the housing targets set out in London Plan Policy 3.3 and CLP1 Policy SP2.2 whilst adhering to the sustainable development principles in the NPPF.
- 7.22 The Proposed Development provides nine one bedroom (two person flats), one of which is suitable for a wheelchair user. This constrained site close to key transport infrastructure does not provide any two or three bedroom forms of housing. However, across the tranche of applications approximately 16% of all new homes will feature 3 or more bedroom homes, these homes are provided on sites more suitable to family housing.
- 7.23 In summary, the Proposed Development will provide nine residential units in an existing residential area. The proposed built form has been carefully considered in respect to the proximities of existing properties, incorporating local design characteristics and maximising dual aspect facing properties. The delivery of high quality new homes that could be occupied by individuals and couples outweighs the loss of the reduced provision of grassed amenity land. The Development Proposals are therefore considered to comply with the Chapter 6 of the NPPF, London Plan Policy 3.3, 3.4 and 3.8 and CPL1 Policy SP2.

SCALE, MASS AND LAYOUT

Relevant Planning Policy

- 7.24 Chapter 7 of the NPPF sites good design as a key aspect of sustainable development.
- 7.25 Chapter 7 of The London Plan London's Living Places and Spaces, London Plan requires development to be informed by their neighbourhoods, be in keeping with the character of the area and achieve the highest standard of accessible and inclusive design (Policies 7.1, 7.2 and 7.4). Policy 7.6 Architecture states "architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context."
- 7.26 CLP1 Policy SP4 Urban Design and Local Character sets out the requirement for high quality development, which respects and enhances Croydon's varied local character and contributes positively to the public realm, landscape and townscape to create sustainable communities. Policy SP4.2 states that development should

be informed by the distinctive qualities, identity, topography and opportunities of the relevant Places of Croydon.

- 7.27 UD2 Policy Layout and Siting of New Development, states that development proposals will be permitted provided they reinforce the existing development pattern, address the street to provide active frontages, allow adequate daylight and sunlight to penetrate onto and between buildings and retain trees where appropriate.
- 7.28 UDP Policy UD3, Scale and Design of New Buildings, continues to say that proposals will be permitted provided they respect the height and proportions of surrounding buildings which play an important role in determining the character of the street.
- 7.29 UDP Policy UD6 Safety and Security states that the aforementioned should be an intrinsic consideration in the detailed design and layout of buildings and the spaces around them, helping to deter crime and reduce the fear of crime.

Assessment

- 7.30 As discussed above, the Site is within a predominately residential area and therefore the proposed residential development complements the character of the existing area. The housing stock in the immediate context is a mix of two and four storey houses and four to eight storey residential blocks, which are directly adjacent to the Site.
- 7.31 In terms of scale, mass and height, the Proposed Development is sympathetic to the surrounding two to four storey residential properties. The three storey building is considered appropriate to this infill location at a similar height to the existing residential properties but not competing with the eight storey residential blocks. The detailed design is not overly dominant. The inset balconies not only provides interest and depth they are positioned to overlook public open space and reduce the impact on the terrace houses located to the west of the site (the closest being no.60 Academy Gardens).
- 7.32 The Proposed Development presents a new frontage to the pedestrian footpath that runs through the existing linear space. This active frontage provides natural surveillance to this footpath making pedestrians feel safer particularly at night.
- 7.33 The design proposes a simple and refined façade treatment that exploits the familiar and robust qualities of facing brick which aims to be both distinctive and sympathetic to the residential context. The use of varying brick tones draws upon the existing range of colours that are found within the residential area in order to reference the local context. The fenestration is carefully considered with the location of openings arranged to avoid the perception of overlooking whilst provide good levels of daylight to the proposed flats.
- 7.34 The Proposed Development was consulted on by the Secure by Design Officer who recommended a number of measures to address UDP Policy UD6. As such, the scheme has been designed to create a safe and

accessible environment for a wide range of users. The apartments are served by a large covered entrance porch area.

- 7.35 The existing pedestrian route is maintained to the western side of the site. The secure communal refuse store is situated to the western side of the building. Controlled access to the communal cycle store and secure courtyard amenity space is situated to the east of the site, accessed through the main entrance (controlled by a fob) to the upper flats. The ground floor flats feature their own individual secure cycle stores to their own dedicated rear gardens.
- 7.36 These rear gardens and the communal garden space is secured by a 2.7m high fence. The ground floor flats have individual access to their rear gardens.
- 7.37 As demonstrated in detail in the Design and Access Statement and above, it is evident that the high quality Proposal fully complies with London Plan Policies 7.1, 7.2, 7.4 and 7.6, and Croydon Local Plan policies SP4.1, SP4.2 together with UD2, UD3 and UDP 6 and guidance set out in the SPD 3, Designing for Community Safety

IMPACT ON ADJOINING AND SURROUNDING OCCUPIERS

Relevant Planning Policy

- 7.38 The London Plan 2011 Policies 7.14 Improving Air Quality and 7.15 Reducing Noise and UDP Policy EP1 Pollution seek to protect residents from pollution associated with new development, such as increased noise disturbance and air pollution.
- 7.39 The London Plan Policy 7.6Bd states that buildings should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings in relation to privacy and overshadowing. The London Housing SPG states that the degree of harm on adjacent properties within a proposed scheme should be assessed drawing on broadly comparable residential typologies within the area and of a similar nature across London.
- 7.40 UDP Policy UD8 Protecting Residential Amenity sets out that the Council will have regard to the following factors when considering applications for residential development:
- (i) Form and layout of existing and adjacent buildings.
 - (ii) Privacy and amenity of occupiers of surrounding buildings ensuring that both new and existing occupiers are protected from undue visual intrusion and loss of privacy; and
 - (iii) Amenity space that respects the character of the surrounding area and provides an amenity area for residents.
 - (iv) Residential amenity space that is considered as an integral part of the design of the overall development concept.

(v) Maintenance of sunlight or daylight amenities for occupiers of adjacent properties.

Assessment

Layout, privacy and visual impact

- 7.41 As set out above, the Proposed Development has been designed to respect the layout of the surrounding buildings and character of the area, and to maintain acceptable levels of amenity to the occupiers of neighbouring properties.
- 7.42 As discussed in the Design and Access Statement, during design development significant work and thought was given to the relationship towards the gable end of no.60 Academy Gardens.
- 7.43 In relation to no.60 Academy Gardens, the Proposed Development is situated towards the eastern boundary of the site away from the dwelling. The location of the windows have been carefully positioned with the flats located towards the south part of the block positioned to face south over the publicly access grassed area rather than the rear garden to no.60 Academy Gardens. The balconies have been inset into the building and positioned to overlook the publically accessible green open space providing greater levels of surveillance to this space. The design of this block is not considered to have a significant impact on the privacy of the existing or new residents as a substantial distance has been created between the two buildings and the window and balcony openings have been carefully designed to prevent any overlooking or loss of privacy to the occupiers of no.60 Academy Gardens and neighbouring properties.
- 7.44 The proposed building has been inset from the eastern boundary, creating private outdoor amenity areas. The windows to the eastern elevation of the development predominately serve non-habitable rooms. The design of this proposal is not considered to result in an unacceptable level of overlooking area of open space to the rear, nor prevent this site being developed in the future.
- 7.45 Due to the location of the linear block set away and off centre with the eight storey residential blocks to the south west and the four storey block to the north, due to the distance between the properties the proposal is not considered to result in an unacceptable level of overlooking or loss of privacy.
- 7.46 In summary, although some of the distances resulting from the Proposed Development are particularly close, the scheme has been carefully designed giving consideration to the internal layouts of neighbouring properties and positioning windows away from sensitive locations.

Amenity space

- 7.47 As discussed at paragraphs 7.7-7.11, there will be a small loss of existing amenity space that is not currently particularly well used but does provide some level of visual amenity. The Proposed Development seeks to improve the quality of the retained grassed amenity space making it a more usability of the space for the existing and future residents.

Daylight/sunlight

- 7.48 The daylight and sunlight assessment, submitted as part of this application sets out in detail the tests which have undertaken to determine whether the proposals are acceptable.
- 7.49 The daylight and sunlight assessment tested the impact of the proposed scheme on all the residential properties that surround the development proposal. All but one of the properties was found to experience no alteration to their daylight and sunlight outside of the BRE guidelines.
- 7.50 The one property to experience a daylight transgression was no.9 Nicholson Road, while all windows would remain fully BRE compliant for the VSC criteria, one room would experience a minor transgression of the NSL criteria. The retained level of sky visibility of this room however, would remain good at over 55% of the room with a view of the sky, which is commensurate with an urban area such as this. The property would be fully compliant for sunlight (APSH) criteria. The assessment demonstrates that the proposed scheme will have an almost negligible impact on the daylight and sunlight amenity of surrounding residential dwellings. .

Summary

- 7.51 It has been shown above that overall existing residents amenity will be protected with some an almost negligible impact on the daylight / sunlight to no.9 Nicholson Road. On balance, the improved surveillance and improvements to the public green space will assist with mitigating this transgressions. The proposals are therefore considered to be in accordance with the relevant London Plan policies and UDP Policy UD8.

AMENITIES OF FUTURE OCCUPIERS

Relevant Planning Policy

- 7.52 The London Plan Policy 3.5 Quality and Design of Housing Developments sets out that internal and external quality should be high. Table 3.3 sets out minimum space standards for new residential development. The Mayor's Housing SPG sets out residential standards and guidance.
- 7.53 Croydon Local Plan - Strategic Policies Policy SP2.6 Homes: Quality and Standards requires all new homes achieve the minimum standards set out in the London Plan and The Mayor's Housing SPG (Nov 2012).
- 7.54 UDP Policy UD8 Protecting Residential Amenity (see paragraph 7.40) states that residential amenity space must be considered as an integral part of the overall development and that amenity space must respect the character of the surrounding area.
- 7.55 Saved UDP Policy RO12 states that planning permission will not be granted for residential development unless recreational open space arising from the needs generated by the proposal is provided at a standard of 2.43ha per 1000 people. Commuted payments for off-site provision based on this standard will be acceptable where the Site is within an area of high density.

Assessment

Quality

- 7.56 The internal floorspace of the 1b2p units range from 50.4 sqm to 53.0 sqm. The 1b2p wheelchair accessible home and measures 63.7 sqm. All units comply with the Mayor's minimum space standards and all have good outlook and circulation space.

Amenity

- 7.57 Private gardens are proposed for three units on the ground floor. These are enclosed by fencing and hedging. The six upper floor units have inset balconies that lessen overlooking to adjacent properties. The balconies comply with the minimum size standards within the Housing SPG. A private communal rear garden space is also located to the east of the building, it contains the secure cycle parking facilities.
- 7.58 The Proposed Development makes significant improvements to the amenity space surrounding the proposed block providing a new setting for the building as well as imbedding it within the context of the neighbouring buildings improving the quality of the currently underused shared space. The existing open space is being redesigned to make a more secure and useable area of informal 130 sq m of recreational space for use by existing and new residents, these benefits should be afforded substantial weight.
- 7.59 A communal cycle store with six spaces is located on the ground floor for the upper floor flats. At least one secure cycle parking place is provided to the rear gardens of each ground floor unit. Two visitor cycle parking spaces are also provided within the landscaping. This number of spaces exceeds with London Plan standards.

Daylight/sunlight

- 7.60 The nine residential units are all dual aspect and feature good sized window openings, no residential unit is designed to be single aspect. The residential units have been designed to provide good levels of natural light and outlook.
- 7.61 The proposals have been carefully designed and considered to be in accordance with Policy UD2 and UD8.
- 7.62 Overall the standard of accommodation provided to future occupants is considered to be good.

CAR PARKING AND SUSTAINABLE TRAVEL

Relevant Planning Policy

- 7.63 Paragraph 27 of the NPPF seeks to promote sustainable transport solutions and supports the production of a Travel Plan.

- 7.64 London Plan Policy 6.1 states that the Mayor will work with all relevant partners to encourage the closer integration of transport and development by encouraging patterns and nodes of development that reduce the need to travel, especially by car and that parking standards are set as a maximum. The London Plan parking standards state that 1 to 2 bed units should have less than 1 parking space per unit. Policy 6.3 Assessing the Effects of Development on Transport Capacity states development proposals should ensure that impacts on transport capacity and the transport network, at both a corridor and local level, are fully assessed. Development should not adversely affect safety on the transport network.
- 7.65 CLP1 Policy SP8.15 states that the Council will encourage car free development in Centres, where there are high PTAL levels and when a critical mass of development enables viable alternatives, such as car clubs.
- 7.66 CLP1 Policy SP8.3 Pattern of Development and Accessibility states that the Council will actively manage the pattern of urban growth and the use of land to make the fullest use of public transport, and co-locate facilities in order to reduce the need to travel.
- 7.67 UDP Policy T8 Traffic Generation from Development states that development will only be granted where the traffic generated by a development can be satisfactorily accommodated on nearby roads, allowing for ameliorating measures such as the increased use of public transport or cycling.

Assessment

- 7.68 A Transport Statement has been prepared in support of the application which assesses the effects of trip generation from the Proposed Development on the local transport network and parking demand. A Travel Plan has also been prepared.
- 7.69 The Transport Statement sets out that the low level of trip generation from the Proposed Development is expected to result in a negligible effect on the transport networks and would therefore have no material impact on highway capacity or safety.
- 7.70 In relation to parking, the Proposed Development is car-free with the potential to deliver one disabled parking space in the future. This justification for this approach is set out below.
- Due to the size of the Site it is difficult to provide off-street parking that doesn't impact the character of the area within close proximity of the site.
 - Current car ownership levels for the area is 0.74 per household. Using this figure, the demand generated for parking from the Proposed Development would be 7 spaces, although this is likely to be lower as all nine units are one bedroom.
 - A parking stress survey was undertaken as part of the scope of the Transport Statement to assess whether it would be possible for the new residents to park on-street nearby. The results indicated that there is currently no unrestricted car parking spaces within 200 metres of the site.
 - The overnight parking stress was found to be 39%, with stress on Fisher Close (100%) where parking was also observed to occur outside of legal parking areas across driveways. Parking stress on Academy

Gardens was low at 10%. However, taking into consideration the illegal parking, there was no spare unrestricted parking capacity in the study area.

- The Site is suited to being a car-free development as it has a moderate PTAL of 3/4 and it is an accessible location within 1.2km walk from East Croydon train Station which provides 27 services into London and around 26 services per hour southbound to destinations such as Brighton, Caterham and Three Bridges. The nearest bus stop is also only a couple of minutes' walk away on the A222. This range of transport provision significantly reduces the need to future residents to require the use of a private car. Furthermore, there are a number of shops, services and facilities all within walking and cycling distance.

7.71 In addition to the site being having a good PTAL and low levels of existing car ownership, possible mitigation measures include a car-club space on street, which would potentially contribute to reducing car-ownership levels not just in the proposed scheme but also the surrounding area.

7.72 Furthermore, the proposals will provide one bed units which are more likely to attract professionals as opposed to families which further reduces the requirement for residents to own a private car.

7.73 Given the PTAL level and the sustainable location, we consider a car free development to be acceptable and accords with the London Plan policy of supporting car free development and with CPL1 policy SP8.16 which states the Council and its partners will seek to limit parking spaces in the borough.

7.74 To further support a reduced level of car parking, a Travel Plan has been prepared and is submitted as part of this application. The Travel Plan's objectives actively encourage the use of sustainable travel modes, namely walking, cycling and public transport, to and from the completed development. It also seeks to reduce car ownership and minimise the number of private car journeys to and from the Site as well as increasing the awareness of sustainable modes of transport to promote healthy lifestyles.

7.75 The following measures will be implemented to support the above objectives. A newsletter will be sent to residents promoting key travel information to the Site, Broadband cables will go to the units to allow people to work from home. Cycle parking will provided in accordance with the London Plan, the proposal will be car free other than the potential wheelchair space and on street car club space. The Action Plan of how this is going to be implemented is set out in detailed Travel Plan.

7.76 The Travel Statement confirms that Proposed Development broadly complies with national, regional and local planning policy.

TREES AND LANDSCAPING

Relevant Planning Policy

7.77 London Plan Policy 7.21 requires existing trees of value to be retained and any loss as the result of development to be replaced and new tree planting is encouraged. London Plan Policy 7.19 states that

proposals should, wherever possible make a positive contribution to the protection, enhancement, creation and management of biodiversity.

- 7.78 CLP1 Policy SP7 Green Grid seeks to protect and enhance new green spaces, enhance biodiversity, green landscaping, green roofs and productive landscapes.
- 7.79 UDP Policy NC4 requires that valued trees, especially those protected by Tree Preservation Orders are safeguarded. Policy UD14 requires developments to retain the most important trees and for landscaping proposals to be considered as an intrinsic part of the design concept. Saved UDP Policy NC2 states that planning permission will not be granted for development that would cause demonstrable harm to a species or animal or plant or its habitat.

Assessment

- 7.80 There are 37 existing trees on the Site which have all been identified on or surrounding the site. Ten trees (no.5 Grade B, no.4 Grade C & no.1 Grade U) are proposed to be removed to facilitate the development. Although it is noted that the tree does have some visual amenity, the loss will be mitigated by the re-provision of 15 new trees which is a replacement ratio of 1.5:1.
- 7.81 Furthermore, as set out in the Design and Access Statement, the proposed landscape strategy for the development is an intrinsic part of the design concept. The proposed landscape surrounding the new block provides a setting for the new building, as well as embedding it within the context of the neighbouring properties and improving the quality of their existing, shared communal spaces. The Proposed Development also proposes to include an extensive biodiverse substrate based roof which will contain a mixture of seeds sown and plug plants with irrigation to establish the vegetation. This mitigation and the implementation of the landscape strategy means that there is likely to be a net gain in total for biodiversity on the Site.
- 7.82 An informal playspace which incorporates natural play balance beams and shrub planting is provided to the south of the residential block adjacent to the footpath linking Academy Gardens and Lower Addiscombe Road.
- 7.83 The quality of the landscaping proposed with this scheme accords with London Plan Policy 7.19 and 7.21 and UDP Policies NC2, NC4 and UD14.

8 AFFORDABLE HOUSING ASSESSMENT

- 8.1 As we explained in Section 2, Croydon Council has set an ambitious target of achieving the delivery of up to 50% affordable housing provision across the portfolio of sites that are being developed by Brick by Brick.
- 8.2 Although this Site is a wholly private scheme, it is important that its position within the overall Smaller Sites Programme is understood. Therefore, the purpose of this section is to set the application proposals for the land adjacent to Academy Gardens within the context of the overall development of the portfolio and also the separate phase of development within which it sits. It considers the proposal and the tranche as a whole against the relevant policies relating to the provision of affordable housing and considers whether there are any issues arising from 9 of the 11 schemes within this tranche being mono tenure. For analysis purposes we have assumed the 1 and 2 unit schemes at Tollgate and this Ravensdale Gardens site are part of larger schemes resulting in the analysis of 11 rather than 13 schemes. It also explains how tenure will be controlled through the use of a legal agreement linking all of the applications within this tranche.

The Portfolio

- 8.3 The portfolio comprises circa 53 sites that will be developed for a mix of market and affordable housing, with the latter developed in the form of socially rented and shared ownership/discounted market sale. Given the number of sites that are proposed for development, Brick by Brick will bring them forward in four separate tranches. Within each tranche, it is envisaged that there would be a mix of units and given the circumstances of each site and in some cases their small size, it is proposed that some of the sites will be developed as single tenure sites.
- 8.4 We set out below a summary of the portfolio and also a summary of this tranche:

Portfolio

Tenure	Units	%
Private	552	53.8
Affordable	474	46.2
Total	1,026	100.0

Affordable	Units	%
Shared Ownership	310	65.4
Rent	164	34.6
Total	477	100.0

Tranche 2

Tenure	Units	%
Private	121	47.2
Affordable	95	44.0
Total	216	100.0

Affordable	Units	%
Shared Ownership	72	76.0
Rent	23	24.0
Total	95	100.0

- 8.5 This application is one of 13 proposals that are being submitted in the second tranche. It comprises 9 out of the total of 121 private/market units that are proposed within this tranche and it is proposed that no affordable housing would be provided as part of this scheme. As noted, in total the tranche will provide 95 affordable units which is some 44% of the total of this tranche.
- 8.6 Assuming the 1 and 2 unit schemes at Tollgate and Ravensdale Gardens are part of the larger schemes within the tranche as a whole, 9% (1 scheme) is mixed in tenure and 91% are mono tenure (10 schemes). Of the mono tenure schemes, 50% are affordable (5 schemes) and 50% are market (5 schemes). It is the schemes at Tollgate (42 units) that is mixed tenure in the form of 27 private units and 15 shared ownership/discounted market sale units.
- 8.7 Including these proposals, 4 of the sites comprise only market housing, and these sites are Eagle Hill (8 units), Academy Gardens (9 units), Homefield House (24 units) and Marston Way (12 units).
- 8.8 Of the 6 sites that contain only affordable housing, Drovers Road (9 units) and Coldharbour Road (8 units), are shared ownership. Two schemes contain two types of affordable housing; Warbank Crescent is formed of 16 shared ownership homes and 20 affordable rent units and Cheriton House is formed of 24 shared ownership units and 3 affordable rent units. No schemes are solely affordable rent.

8.9 The breakdown of units within the tranche is provided below and we have also provided information on the number of habitable rooms:

	UNIT NUMBERS				HABITABLE ROOMS			
	Mkt	Rent	Share	Total	Mkt	Rent	Share	Total
Eagle Hill	8	0	0	8	28	0	28	28
Coldharbour Road	0	0	8	8	0	0	20	20
Academy Gardens	9	0	0	9	18	0	0	18
Drovers Road	0	0	9	9	0	0	18	18
Thorneloe Gardens	10	0	0	10	24	0	0	24
Marston Way	12	0	0	12	48	0	0	48
Homefield House	24	0	0	24	83	0	0	83
Cheriton House	0	3	24	27	0	6	52	58
Ravensdale (Plots A, B & C)	31	0	0	31	122	0	0	122
Warbank Crescent	0	20	16	36	0	77	52	129
Tollgate (Plots A, B & C)	27	0	15	42	86	0	40	126
Total	121	23	82	216	409	83	184	676

Tenure	H/R	%
Private	409	56.9
Affordable	267	43.1
Total	676	100.0

Affordable	H/R	%
Shared Ownership	184	69
Rent	83	31
Total	267	100.0

Overall provision of affordable housing

8.10 The London Plan and the Croydon Local Plan have a number of policies which seek to guide the provision of affordable housing in London. Policy 3.8 seeks provision of a genuine choice of housing, including affordable family housing. Policy 3.9 seeks to encourage mixed and balanced communities with mixed tenures promoted

across London and specifies that there should be no segregation of London's population by tenure. Policy 3.11 identifies that there is a strategic priority for affordable family housing and that boroughs should set their own overall targets for affordable housing provision over the plan period. Croydon Council has set a target of 50% (Policy CLP1).

- 8.11 As part of the development of the portfolio and specifically this tranche, we have maximised the amount of housing to be provided on this site, and the affordable housing is to be provided on another site, rather than through a commuted payment. Policy SP2.4 and the guidance in Table 4.1 provides for affordable housing to be provided off site on a donor site, and this is exactly what is being provided in this case. In effect, the tranche comprises 11 sites, some of which are donor sites, and overall therefore when taken as a whole, the tranche complies with the requirements of the Local Plan because the maximum amount of affordable housing is being provided, and it complies also with the policy requirements of the Local Plan and specifically Policy SP2.4 which seeks up to 50% of units as affordable. These proposals form part of a tranche that will deliver 44% of the units as affordable.
- 8.12 It is relevant also that the affordable housing is being provided on donor sites and a commuted sum is not being paid. Where commuted payments are made, there is normally a lag between the payment being paid and provision being made. This will not happen here because the donor sites will come forward for development at the same time.
- 8.13 It is worth noting that based on the Council's own assessment which is set out in the Annual Monitoring report, the development industry has failed to meet the target of the Council and the GLA to achieve 50% of all new housing being delivered as affordable. Housing completions data published by LB Croydon for the period 01.04.15-31.12.15 demonstrates that for completed residential developments, only 21% of the total provision was affordable housing and a number of the completed schemes provided 100% affordable housing and were not mixed tenure
- 8.14 Affordable housing is 44% of all of the housing units to be provided in this tranche and we contend that this is a very significant level of provision and that significant weight should be placed on this in the determination of the application.
- 8.15 It is relevant also to note the Council's waiting list for affordable housing is over 5,000 families in 2015 (source: London Data Store). The provision of 95 units in this tranche and 474 overall within the portfolio will make a significant contribution to meeting this need.

Type of affordable housing

- 8.16 The table below summarises the current proposals for the portfolio as a whole which is that 43% of the affordable housing will be for rent and 57% for shared ownership:

Tranche	Shared Ownership	Affordable rent
1	37 (74%)	13 (26%)
2	72 (76%)	23 (24%)
3	76 (75%)	25 (25%)
4	125 (55%)	103 (43%)
Total	310 (65%)	164 (35%)

- 8.17 Paragraph 50 of the NPPF states that Local Planning Authorities should identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand and where a need for affordable housing has been identified, policies should be set for meeting this need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified (for example to improve or make more effective use of existing housing stock) and the agreed approach contributes to the objective of creating mixed and balanced communities. Paragraph 50 continues to state that such policies should be sufficiently flexible to take account of changing market conditions over time.
- 8.18 Policy 3.9 of the London Plan sets out that a more balanced mix of tenures should be sought in all parts of London, particularly where social renting predominates and there are concentrations of deprivation whilst Policy 3.11 sets out that 60% of the affordable housing provision should be for social and affordable rent and 40% for intermediate rent or sale. Priority should be accorded to provision for affordable family housing.
- 8.19 Policy SP2.3 of Croydon’s Local Plan Strategic Policies (2013) sets out a strategic policy target of 25% of all new homes to be affordable rented homes and 10% to be intermediate homes. Table 4.1 (see below) sets out that LBC will seek a 60:40 ratio between affordable or social rent and intermediate low cost home ownership (unless there is agreement by a Registered Provider that a different tenure split is justified within the Croydon Opportunity Area).

Table 4.1: Approach to providing affordable housing on individual sites

The council will...	Outside of Croydon Opportunity Area	Within Croydon Opportunity Area
Negotiate to achieve up to...	50% affordable housing	50% affordable housing
With a minimum requirement of...	15% for first financial year of the plan period post adoption and thereafter reviewed annually in the Croydon Monitoring Report via a Dynamic Viability Model set out in Table 4.2	15% for the first three financial years of the plan period post adoption and thereafter reviewed every three years in the Croydon Monitoring Report via a Dynamic Viability Model set out in Table 4.2.
Seek a mix of affordable housing tenures (as defined in the National Planning Policy Framework)	60:40 ratio between affordable or social rent and intermediate low cost shared home ownership	60:40 ratio between affordable or social rent and intermediate low cost home ownership unless there is agreement between Croydon Council and a Registered Provider that a different tenure split is justified.
Policy Flexibility		
On-site/off-site provision	Presumption that all provision is on-site	A minimum of 10% affordable housing will be on-site for the first three years of the plan. Provision of affordable housing above the minimum on-site requirement should be provided either on site; off site on a donor site(s); or through a commuted sum. For donor sites the mechanism, sites, development timing and dwelling mix for each donor site will need to be agreed by the council prior to the commencement of development on the parent site. The donor site will have to adhere to Policy SP2.4a in terms of meeting its affordable housing requirement and only the additional affordable housing beyond this policy requirement will be considered to constitute off site provision.
Review mechanism	None	Committed sum payments linked to gross development value provided through a review mechanism at agreed stages of the development.

- 8.20 Croydon Council are currently in the process of undertaking a partial review of its Local Plan and are seeking to amend policy in relation to on-site/off-site provision. Whilst retaining the 60:40 tenure split, and to the mix of affordable housing tenures from 60:40 the policy now states that the intermediate housing can include Starter Homes and the split must be adhered to unless there is agreement between Croydon Council and a Registered Provider that a different tenure split is justified and subject to national regulations on provision of starter homes
- 8.21 Greater flexibility is also proposed outside of Croydon Opportunity Area and within district centres where donor sites may be used to provide affordable housing provided 10% affordable housing will be on-site and the donor site is located within the same Place as the District Centre.
- 8.22 As noted, the current proposals in Tranche 2 provide for 24% affordable rented accommodation and 76% shared ownership, and in the portfolio as a whole, the proportions are 35% affordable rented and 65% shared ownership. This does not meet the Council's current target of 60:40.
- 8.23 There are two points to note. First, this split is a necessary and an important part of the overall viability of the project, leading to the achievement of almost half of the homes being affordable (46%). We have tested the viability of sites on a 60:40 rented and shared ownership split on a policy compliant basis and the number of viable sites reduces and the total delivery of affordable units drops significantly from the 474 currently proposed. The proposed approach therefore not only delivers an almost policy compliant total of 46% affordable homes, but it also provides significantly more affordable units in total.
- 8.24 Increasing the amount of socially rented accommodation leads to a reduction in the total amount of affordable housing that can be provided. It is suggested that the approach that is proposed can be supported because it will provide the maximum amount of each type of affordable housing.

8.25 Second, some of the wards in which the affordable housing is proposed already have a high proportion of socially rented accommodation, and therefore these proposals will provide greater balance in the type of affordable housing proposed within that ward. This information will be provided on a tranche basis to demonstrate the overall acceptability of the proposals.

8.26 Finally, it is worth noting that the Council's Housing team supports Brick by Brick's development proposals on the basis that it will deliver 474 affordable units, of which 164 will be for rent. This is a significant contribution to the borough's overall housing stock.

Mono tenure within the ward

8.27 Having regard to the guidance in the development plan about the benefits of mixed tenure developments, Academy Gardens is located within Addiscombe ward and it is important to consider whether there are any issues arising from a mono tenure scheme being provided within the ward and within the borough as a whole.

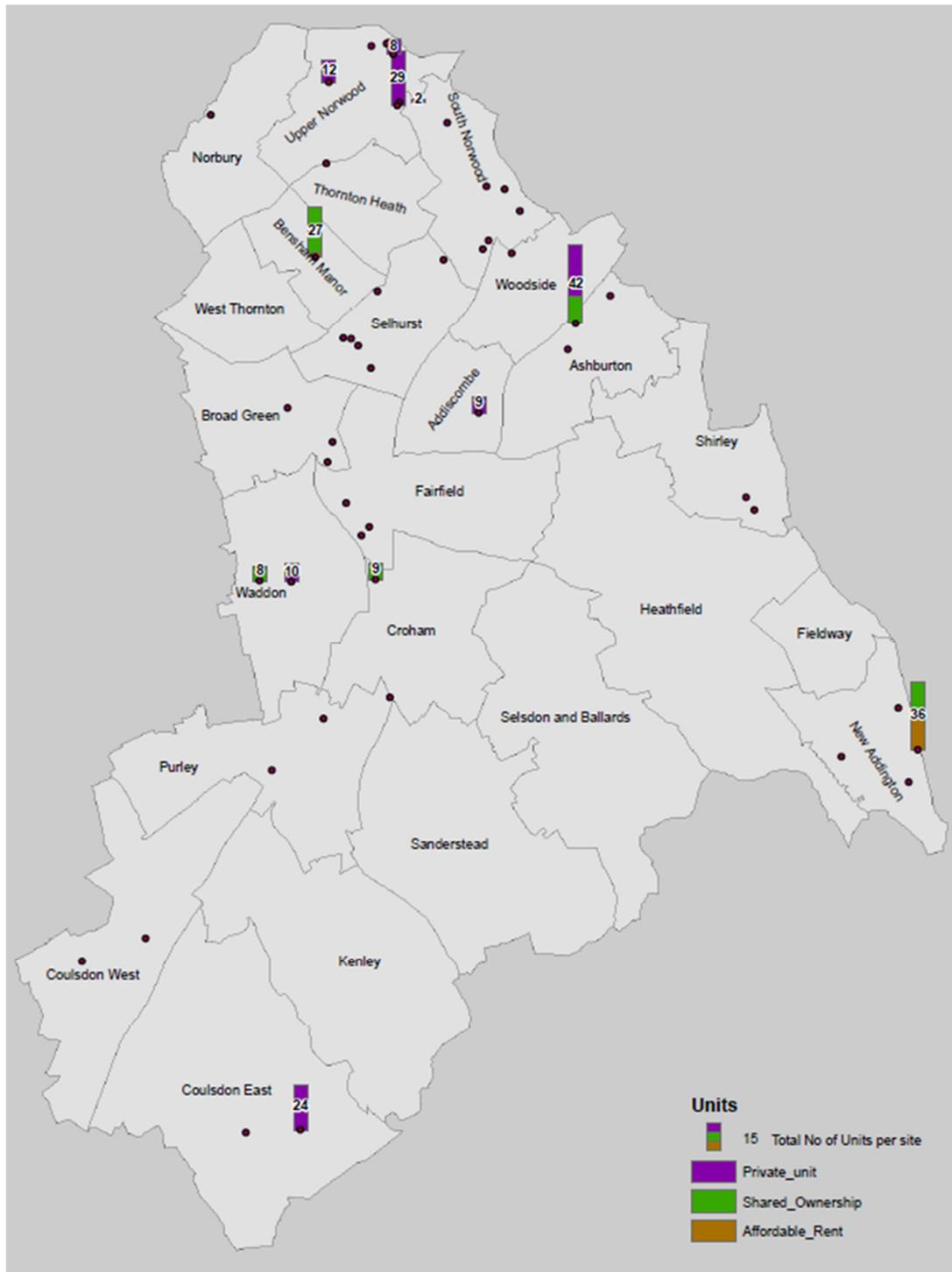
8.28 Within the borough as a whole, 58.8% of the housing stock is owner occupied. Within the ward, the level is 55.2%. Within the borough, 19.2% is socially rented or shared ownership, and within the ward it is 21.9%. This information is summarised in the table below:

Tenure	Croydon		Addiscombe	
	number	%	number	%
All households	145,010	100	7,553	100.0
Owned	85,230	58.8	3,899	51.6
Owned: Owned outright	34,882	24.1	1,380	18.3
Owned: Owned with a mortgage or loan	50,348	34.7	2,519	33.4
Shared ownership (part owned and part rented)	1,855	1.3	81	1.1
Social rented	25,887	17.9	1,339	13.7
Social rented: Rented from council (Local Authority)	14,362	9.9	472	6.2
Social rented: Other	11,525	7.9	563	7.5
Private rented	30,472	21.0	1,423	32.5
Private rented: Private landlord or letting agency	28,762	19.8	2,327	30.8
Private rented: Other	1,710	1.2	125	1.7
Living rent free	1,566	1.1	86	1.1

8.29 The above table demonstrates that the ward of Addiscombe is fairly balanced in terms of the tenure mix and is broadly reflective of the housing mix of the borough as a whole. It is evident that the introduction of 9 private units would be unlikely to result in any significant social changes at the local neighbourhood level.

8.30 The tranche as a whole will provide 44% of the units as affordable which is materially above the borough average of 19.2%. The portfolio as a whole will provide 46% affordable which is also materially above the borough average.

8.31 The location of the units within this scheme, the second tranche and the portfolio as a whole, are shown on the map below. The map and the analysis of tenure illustrates the dispersed nature of the schemes around the borough and that the proposals achieve the stated policy objective to achieve the maximum amount of affordable housing as part of mixed communities.



9 CONCLUSIONS

- 9.1 The proposed development will provide 9 high quality, well designed units for sale. All of the units meet the minimum space standards. These will contribute towards meeting Croydon Council's housing need, not only as a stand-alone site, but as part of the second tranche of Brick by Brick's strategy to deliver approximately 1,000 new homes.
- 9.2 The new building will complement the existing residential blocks that already encircle the site. As such, the new building will be provided within a well landscaped setting maintaining the existing pedestrian footpath through the site, together with additional improvements to the existing amenity space on the Site. The amenity for new residents will be good and the scheme will not impact on the amenity of existing residents. The loss of 10 trees is being mitigated by the re-provision of 15 trees within the landscaped setting.
- 9.3 The Site is located in a predominantly residential area with a moderate PTAL rating (3/4). As such, it is considered a suitable location for this density of development and the proposal will be car free. The provision of one dedicated wheelchair space for the wheelchair accessible unit as well as a car club space located in could be incorporated close to the development. Cycle parking will be provided to meet standards.
- 9.4 The NPPF provides a clear presumption in favour of sustainable development and the provision of all forms of new housing. The CLP1 and the London Plan set out a clear need to provide housing in the borough with the CLP1 Partial Review increasing this need significantly. These are important policy objectives to which significant weight should be attached. As noted, although this scheme does not provide any forms of 3-bed family units or affordable units, the tranche of planning applications which this application forms part of is broadly policy compliant on housing mix and fails marginally only in respect of 3 bed units and the split of affordable housing tenure, although as noted in respect of the latter, non-compliance allows significant more units to be provided and we contend that significant weight can be placed on this.
- 9.5 Given the quality of the design of the scheme and the significant benefit of the delivery of new housing, we contend that planning permission should be granted.