

Cane Hill Hospital, Coulsdon

in the London Borough of Croydon

planning application no. 13/02527/P

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008

The proposal

Hybrid planning application seeking outline consent for redevelopment to provide up to 488 residential units, provision of retail (Class A1 – A5), business (Class B1) and assembly/leisure and non-residential institutional uses (Class D1 – D2), re-use of the water tower, chapel and administration buildings for the above uses; conversion of North Lodge to single dwelling house, refurbishment and change of use of former Medium Secure Unit for farming purposes, erection of barns and single building of 3,000 sq.m. for hotel or offices, full consent for 187 residential units and creation of new access from Marlpit Lane/Brighton Road roundabout.

The applicant

The applicant is **Barratt Homes** and the architect is **HTA**

Strategic issues

The redevelopment of this derelict Green Belt site for housing is strongly supported in principle. Very special circumstances have been demonstrated to justify inappropriate development, although the increase in footprint is a concern. The design quality is high. The maximum reasonable amount of affordable housing needs to be verified and the level of family affordable need further discussion. The 40% carbon dioxide reduction target has not been achieved. Public access, playspace and tree mitigation need to be secured. Transport matters including access and highway impact need to be resolved.

Recommendation

That Croydon Council be advised that while the application is generally acceptable in strategic planning terms the application does not comply with the London Plan, for the reasons set out in paragraph 78 of this report; but that the possible remedies set out in that paragraph could address these deficiencies.

Context

1 On 27 November 2013 the Mayor of London received documents from Croydon Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 7 January 2014 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Categories 1A, 1B, 3D and 3E of the Schedule to the Order 2008:

1A – development of more than 150 residential units

1B – development of more than 15,000sq.m.

3D – development of more than 1,000sq.m. on Green Belt

3E – business or hotel development of more than 2,500sq.m. that does not accord with the development plan

3 Once Croydon Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 (EIA applications only) The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 has been taken into account in the consideration of this case.

5 The Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

6 The former Cane Hill Hospital site is located on the edge of the borough of Croydon, in Coulsdon. Originally developed in 1882 as the third Surrey County Lunatic Asylum it transferred to the NHS on its creation and finally closed in 1991, save for a small Medium Secure Unit which continued operating until 2008. The buildings remained vacant for many years and were subject to extensive vandalism and arson attacks and were finally demolished in 2010. Only the Water Tower, Chapel and a small remnant of the front administration building now remain. At its peak the hospital housed some 2,000 patients and 700 staff. The main access to the hospital was from Brighton Road close to its junction with Lion Green Road, with a secondary goods access from Portnalls Road.

7 The 83 hectare site is located on a finger of land that rises by about 80 metres from the north, east and west, to a plateau at the centre of the site, where the hospital buildings were located, surrounded by fields and woodlands. The extensive grounds were used for farming, originally by the hospital and latterly by a tenant farmer, who is still operating at the site. This part of the borough is characterised by a series of steep sided valleys, some of which have been developed for residential use, while others remain undeveloped, e.g. Farthing Downs.

8 There is one public right of way that runs broadly east west across the site from Coulsdon South Station to Portnalls Road. The adjacent area to the east west and south is characterised by low density housing, there are two primary schools located on the north western boundary. Immediately to the north is the Surrey Iron Railway Scheduled Ancient Monument and Lion Green Road car park, beyond is Coulsdon Town Centre and the former Coulsdon North Industrial Estate. The A23 Coulsdon by-pass, which opened in 2006, cut through the hospital site along its eastern boundary and includes the Marlpit Lane roundabout, which was constructed to allow an extra arm to facilitate a new access to the hospital site, anticipating the likely future redevelopment.

9 The whole site is designated as Green Belt, various parts of the site are also designated for their archaeological and biodiversity value and designated views.

10 The site is located 50 metres from the slip road access to the A23 Farthing Way, which is the nearest section of Transport for London Road Network (TLRN). Coulsdon South railway station is 200 metres from the nearest site boundary. Coulsdon Town and Woodmansterne railway stations are approximately 450 metres and 800 metres from the nearest site boundary respectively. The site is not served directly by any bus routes. As a result, the site currently has a public transport accessibility level (PTAL) ranging between 1a and 3 (on a scale of 1a to 6b where 6b is the most accessible). This indicates that the accessibility of the site ranges from very poor to moderate.

Details of the proposal

11 Barratt has submitted a hybrid planning application seeking outline consent for redevelopment to provide up to 488 residential units, provision of retail (Class A1 – A5), business (Class B1) and assembly/leisure and non-residential institutional uses (Class D1 – D2), re-use of the water tower, chapel and administration buildings for the above uses; conversion of North Lodge to single dwelling house, refurbishment and change of use of former Medium Secure Unit for farming purposes, erection of barns and single building of 3,000 sq.m. for hotel or offices, full consent for 187 residential units and creation of new access from Marlpit Lane/Brighton Road roundabout.

12 The development is conceived in four development zones, the detailed application zone, the Gateway development zone, Hill development zone and South development zone. They would create a single development with a continuous link between that closest to the town centre and the more remote housing located on the site of the former hospital buildings. The Gateway development zone would encompass the office/hotel and flats the remainder of the zones comprise detached, semidetached and terraced houses of two/three storeys.

Case history

13 An application for demolition of remaining buildings and importing of inert waste was referred to the Mayor in December 2009. The Mayor confirmed that this did not raise any strategic planning issues (PDU/2108/JF01). An application for a replacement farmhouse on the site of the former Portnalls house was referred to the Mayor in March 2010. The Mayor raised concerns about the acceptability of this development given the Green Belt location (PDU/2608/01). This application was withdrawn.

14 A pre-application meeting was held in April 2013 with Barratt.

Strategic planning issues and relevant policies and guidance

15 The relevant issues and corresponding policies are as follows:

- Green Belt/MOL *London Plan*
- Housing *London Plan; Housing SPG; Housing Strategy; draft Revised Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context, draft SPG*
- Affordable housing *London Plan; Housing SPG; Housing Strategy; draft Revised Housing Strategy*
- Density *London Plan; Housing SPG*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context, draft SPG; Housing SPG; London Housing Design Guide; Shaping Neighbourhoods: Play and Informal Recreation SPG*
- Biodiversity/Geodiversity *London Plan; the Mayor's Biodiversity Strategy; draft Tree and Woodland Strategies; London's Foundations (Geodiversity) SPG*
- Transport *London Plan; the Mayor's Transport Strategy;*
- Crossrail *London Plan; Mayoral Community Infrastructure Levy;*
- Parking *London Plan; the Mayor's Transport Strategy*
- Sustainable development *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy*

16 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the 2013 Croydon Strategic Policies Local Plan, 2006 Unitary Development Plan and the 2011 London Plan (with 2013 Alterations).

17 The following is also a relevant material considerations:

- The National Planning Policy Framework and Technical Guide to the National Planning Policy Framework

18 The Council has produced a Masterplan for Coulsdon, which included Cane Hill Hospital and had intended to adopt it as supplementary planning guidance. However, as a result of legal challenge the document has now been withdrawn. However, the Council has stated that “the studies that were undertaken, the analysis that took place and the extensive community engagement that was part of the master-planning process are all still valid and can be referred to and treated as material considerations in the balance when the Council determines the application for the proposed development at Cane Hill and other developments which are in the areas covered by the studies and analysis”.

Land use principle/Green Belt

19 The whole site is designated as Metropolitan Green Belt. Policy 7.16 of the London Plan confirms that the strongest protection should be given to London's Green Belt in accordance with national guidance and that development will be supported if appropriate and helps secure the objectives of improving the Green Belt.

20 The relevant national guidance is now set out in the NPPF and identifies circumstances where new buildings are not inappropriate, including the complete redevelopment of previously developed sites which would not have a greater impact on the openness of the Green Belt and the purposes of including land within it.

21 Previously the Council wished to promote the development of a science and business innovation park on the site and produced a planning brief in 1998 to assist this process. Amongst other things this established a 'development area', a subset of the total site, within which the science and business innovation park could be satisfactorily developed, in particular maintaining the agreed development footprint of existing buildings. It broadly encompassed the extent of the cluster of hospital buildings although also included a previously undeveloped former playing field. This development area and has been carried forward into the UDP site allocation as CHH2. The remainder of the hospital site is allocated as CHH1.

22 The planning brief and subsequent UDP policies were based on the Government Guidance at the time, PPG2, which at Annex C, provided more detailed guidance on the redevelopment of Major Developed Sites, than is now provided in the NPPF.

23 The development that is now proposed within CHH2 will have no greater impact on the openness of the Green Belt than the previous hospital buildings and is therefore appropriate. Arguably the impact on openness will be substantially less, as austere 3-storey Victorian ward blocks are being replaced by much lower 2/3 storey domestic scale buildings.

24 The development that falls outside of CHH2, in CHH1 (part of the South development zone, part of the detailed application and all of the Hill and Gateway development zones) is located on land that has been previously developed in some parts (farm buildings, piggeries etc) but also includes land that has never been developed. By definition this would have an impact on the openness of the Green Belt and is therefore inappropriate.

25 Very special circumstances that outweigh the harm to the Green Belt are therefore required.

26 The applicant has put forward seven reasons to justify the development.

27 **Adopted development plan policy** – the applicant states that the 2013 local plan objective to deliver a new regeneration vision for Coulsdon, assisted by a 'new residential community and associated facilities on the Cane Hill site' is a material consideration. The 1998 planning brief, UDP policies and draft Coulsdon Masterplan are also referred to. Noting the status of the Masterplan, while the policy documents support development at Cane Hill, none is in the form now proposed and themselves could not be accepted as very special circumstances.

28 **Coulsdon Town Centre regeneration** – the applicant argues that it is important to join Coulsdon Town Centre with the new community at Cane Hill on masterplanning and regeneration grounds. These are; island development will not assist community cohesion, open gaps will not integrate the built form of Cane Hill and Coulsdon, a physical gap will result in physical and perceived separation which could force people into their cars to locations beyond Coulsdon town centre, a link without natural surveillance will not create a sense of security, overlooking and natural feeling of integration, a safe and overlooked pedestrian link will ensure that some of the new resident population will walk into Coulsdon, an attractive and secure route will also benefit the existing community, the proposed new foodstore in the Town Centre is close to the northern tip of the site will act as a natural draw and the option of walking should be encouraged.

29 These factors would enable the proposed Cane Hill development to bring economic benefits to the Town Centre, which is in need of regeneration.

30 It is the case that other former hospitals in the Green Belt have been redeveloped to create isolated, sometimes gated, communities e.g. Netherne and Warlingham Park. The opportunity to create a mixed and balanced community that is fully integrated into its surrounding existing resident population and that is directly and well connected to the Town Centre is a valid argument that has considerable merit and therefore considerable weight should be given to achieving this. The existing Town Centre is in decline, suffering significant expenditure leakage to other nearby centres as well as a loss in passing trade as a result of the by-pass. The opportunity for the Cane Hill redevelopment to contribute to reversing this decline should also be given great weight.

31 **Housing need** – the Council’s Strategic Housing Land Availability Assessment identified that Cane Hill could provide about 700 new homes during the plan period (the Planning Inspector noted that the uncontested evidence to support this). This contributes to the Council’s target of 13,300 dwellings over the period between 2011 and 2021. It may be possible to deliver 700 units in a different layout, perhaps more densely in a form that remained more closely to the developed area. Although this could well have negative impacts and produce a form and mix of development that does not best deliver the range of regeneration benefits. This scheme delivers up to 675 residential units and its contribution as an allocated site to meeting the Council’s housing target is a significant consideration.

32 **Improving the Green Belt** – the applicant has highlighted the benefits of the scheme to the Green Belt, principally by opening up the site to public access, retaining and enhancing the extensive landscape features, restoring contaminated, damaged and derelict land and protecting and enhancing biodiversity. These benefits are to be strongly supported and welcomed. Arguably they could be achieved without the scale of inappropriate development proposed (the applicant has not produced detailed viability evidence to demonstrate otherwise) and would in some cases be policy requirements of any development. Therefore these improvements cannot therefore be fully accepted as very special circumstances.

33 **Impact on the visual openness** – the applicant argues that the visual openness of the Green Belt will be maintained as a whole when considered against the previous hospital complex. Although it is acknowledged that there will be some limited locations, particularly to the east, where development will be more visible and therefore openness affected. The applicant’s assessment shows the potential visual impact from a number of assessment points. This demonstrates that there are a number of locations where there are currently clear views of undeveloped land at Cane Hill which would be replaced by built development. In some cases these may be partly or wholly screened by new enhanced planting, although even in these circumstances they will be visible in winter.

34 **Original hospital buildings** – the applicant highlights the reduced visual impact of the new buildings compared to the original hospital buildings. As stated in paragraph 22 above the three storey Victorian hospital buildings would have had an imposing impact on the surrounding area, being highly visible from a number of locations. A lower rise development, that is more spread out, would have a different, but arguably no more harmful impact than this previous situation.

35 **Development footprint** – Previous Government guidance sought to limit redevelopment to the same development footprint (ground floor area), albeit this could be laid out differently. The agreed footprint of the former hospital buildings at Cane Hill is 44,486sq.m. The applicant is proposing a total footprint of 47,140sq.m. an increase of 5.6% (2,654sq.m.). Although this guidance is no longer valid, the reference to footprint was part of an overall assessment of impact on openness, which remains a relevant test. The applicant has not particularly sought to justify the increased footprint, but notes that this includes garages (5,000sq.m.), which it states will improve the visual amenity of the site by removing vehicles from the access road. Of course subsequent parking of cars in the garages cannot be guaranteed, particularly as they are often used as additional storage space. It is noted that for the detailed phase that only two of the houses that front the main spine road have garages, the remainder have off-street parking. The increase in footprint appears unnecessary and would contribute to harming the openness of the Green Belt.

36 Very special circumstances – conclusion. The applicant has put forward a range of factors to justify the scale of inappropriate development in the Green Belt. Some of these are accepted, others are not. Although the increase in footprint is a concern overall there are very special circumstances that exist to justify the development proposed.

Housing

37 Housing mix - The applicant has provided an illustrative housing mix, as set out in the table below, based on 650 units. Some 80% of the units are three or more bedrooms. This reflects the prevailing character of the local area and is a form of development that is appropriate to the site, given its setting and accessibility. The Council should condition a final unit mix.

Units size	Detailed		Outline		Total		%
	Units	Hab Room	Units	Hab Room	Units	Hab Room	
1-bed flat	-	-	26	52	26	52	4%
2-bed flat	-	-	60	180	60	180	9.2%
2-bed house	11	44	24	96	35	140	5.4%
3-bed house	86	460	163	921	249	1,315	38.3%
4-bed house	63	385	139	837	202	1,222	31.1%
5-bed house	27	209	51	404	78	613	12%
Total	187	1098	463	2490	650	3,522	100%

38 Affordable housing – The applicant is proposing provision of 163 affordable units, of which 98 would be affordable rent and 65 would be intermediate. This would provide a 60:40 split, which is supported by London Plan policy. All of the affordable provided in the detailed application (32 units) would be affordable rent, to reflect the Council’s priority needs, with the remainder provided in subsequent phases. Overall 25% of units are proposed as affordable, however these are dominated by smaller units - all of the 1-bed flats and 2-bed houses are affordable as are two thirds of the 2-bed flats, whereas only 12% of the larger family sized units are affordable. The Council should satisfy itself that this mix of units meets its priority needs.

	Affordable rent	Intermediate	Total
1-bed flat	0	26	26
2-bed flat	10	28	38
2-bed house	24	11	35
3-bed house	53	0	53
4-bed house	11	0	11
Total	98	65	163

39 The applicant has prepared a financial appraisal to demonstrate that this is the maximum reasonable amount. The Council is currently having this independently assessed. The results of this will determine whether the maximum reasonable amount has been provided.

40 The level of provision is based on the 650 units illustrated in the masterplan. However, the application seeks up to 675 units, with the additional 15 units potentially coming from conversion of existing buildings. Should these additional units be delivered an equivalent proportion of affordable units will need to be secured.

Children’s play space

41 The applicant has calculated the child yield for the development, in accordance the SPG requirements. This generates a total requirement across the completed development of 3,290sq.m., noting that the SPG allows the under-5s provision to be discounted where houses with gardens are provided. An additional 240sq.m. could be required if the additional units referred to in paragraph 40 above are provided. The development provides 8.5ha of general recreational amenity space (to include 1,500sq.m. of equipped play and 400sq.m. kick about space in the village greens) as well as a 15km cycling and walking trail. These more than satisfy the requirements of the SPG.

42 The applicant has indicated that 700sq.m. of the equipped space and 2,000sq.m. of the wooded area, meadows, cycling and walking routes would be delivered as part of the detailed application. The Council should ensure these elements are delivered at the requisite stage and the requirements of provision (e.g. type of equipment) are clearly set out.

Urban design

43 The proposed development has been carefully designed to create a high quality contemporary suburban neighbourhood, which is permeable and well connected to social infrastructure and the existing community in the area.

44 Whilst a development of approximately 700 new homes will inevitably change the character and use of the open space and Green Belt, the designers have successfully created a scheme that is predominantly rural in character and which will minimize the visual impact it will have on the surrounding area and open spaces which is welcomed.

45 The street based approach, with buildings arranged in courtyard blocks enclosing private open spaces and fronting on to streets is strongly supported. This ensures the public realm feels active and overlooked whilst providing good quality private amenity space for residents.

46 The overall housing quality of the scheme is high. The predominant use of terrace and semi-detached houses creates homes that meet most of the aspirations of the Mayor's Housing SPG, providing a very high proportion of dual aspect homes, with individual entrances from the street which is strongly supported. All of the units meet the Mayor's minimum space standards.

47 The height of the development is in keeping with the surrounding contextual height with no buildings higher than four storeys. This ensures that the visual impact of the scheme is minimised and the character of the surrounding green spaces is preserved. Locating the taller buildings towards Coulsdon Town centre reflects their proximity to social infrastructure and the hierarchy of the area's urban structure.

48 The appearance of the detailed aspect of the scheme is carefully thought and supported by officers. Design codes sets out a number of requirements for the outline aspect of the scheme which ensures that the quality proposed for the detailed element is built through.

Energy

49 The applicant has followed the London Plan energy hierarchy. Energy efficiency measures will achieve a 2% reduction in CO₂ emissions. The applicant has established that there are no existing or planned district heating networks and is not proposing a site wide heat network due to the low density nature of the housing. The potential for a district heat network in the North development zone will be explored at the reserved matters stage. Combined heat and power has been discounted due to the intermittent heat load. The applicant is proposing photovoltaic cells for the third tier of the hierarchy. This will achieve a further 30% CO₂ reductions, giving total savings of 31%. This falls short of the 40% required of development proposals referred to the GLA after October 1 2013. The applicant is therefore required to explore further measures.

Trees and biodiversity

50 The whole site is covered by a blanket Tree Preservation Order and the extensive matured landscape is a key feature of the site. However, the development proposals will result in the loss of 230 individual trees and 54 tree groups. This includes 89 category A/B trees and 20 category A/B tree groups. This will be off-set through planting of 400 new trees, 7,000sq.m. of woodland planting and 280m of hedgerow planting. In addition over 400 new trees will be planted in back gardens and a significant number of front boundaries will be hedged or planted.

51 Overall this mitigation package outweighs the loss of the existing trees and should be secured by the Council. In particular the proposed verdant front boundaries is a strong feature that the Council should secure and ensure is retained. The use of verdant boundary features as opposed to solid fencing will significantly reduce the visual impact of the development on the openness of the Green Belt and it is therefore important to secure its permanence.

Agricultural use and public access

52 The existing farm operates from farm buildings that are located at the northern end of the site. This forms part of the Gateway development zone, which is necessary in order to provide the physical and functional link to the town centre. It is therefore proposed to convert the existing Medium Secure Unit buildings for agricultural use and convert Glencairn, one of the former staff houses to a farm house. This will enable the agricultural use of the remaining open land and is therefore supported.

53 The applicant is proposing to open up the site to public access, through the provision of a network of new and existing paths and tracks, linking the various proposed areas of open space and woodland. There will also be new access points created around the site, to facilitate routes out to the wider area. The introduction of public access is a key benefit of the redevelopment of this site and is relied on by the applicant to justify the inappropriate development. It is strongly supported and its delivery must be secured by the Council.

Transport

Site access

54 The primary vehicular access to the site will be via an additional arm at the A23 Brighton Road/B276 Marlpit Lane roundabout. This is acceptable in principle to TfL, subject to further detailed cumulative impact assessment as discussed below. The proposals also include two secondary accesses from Portnalls Road, one serving a small number of residential units and the other providing access to main site.

55 Alternative access options directly from the A23, including from the A23 Brighton Road/Farthing Way roundabout, have been discussed with the applicant and the Council. TfL's position is that new accesses directly onto the TLRN should not be provided unless there is strong justification. All other options on Borough roads would need to be assessed and ruled out. The Mayor's commitment to Smoothing Traffic Flow (London Plan policy 6.11) includes managing road congestion and improving traffic journey time, reliability and predictability, as well as safety. Any proposed access into the site from the TLRN would be subject to capacity assessment and modelling and would need to demonstrate that it did not adversely impact on the A23. There would also be visual impacts on the Green Belt which would need to be assessed. Discussions on this issue are ongoing and further work is being undertaken by the applicants to assess the impacts.

Trip Generation

56 The impact of this development should be considered in conjunction with the impacts of other planned developments in the area including development proposals on Brighton Road and Lion Green road. The cumulative impact of these developments on the nearby A23 corridor needs to be assessed in addition to assessment of local highway capacity in Coulsdon.

Highway impact

57 Further traffic modelling work is necessary to identify required highway mitigation measures, particularly at the Lion Green Road/Chipstead Valley Road junction. TfL is in discussions with the applicant and the Council to identify appropriate modelling and highway mitigation measures.

58 The developer and their representatives are reminded that this does not discharge the requirements under the Traffic Management Act 2004. Formal notifications and approvals may be needed for both the permanent highway scheme and any temporary highway works required during the construction phase of the development.

Buses

59 As stated above, the PTAL differs throughout the site because of limited access to bus services. TfL considers services accessible if they are within a 400 metre walk of the site. Whilst

route 405 stops within 400 metres of the site, the pedestrian route to this stop is greater than 400 metres, and TfL therefore consider that no bus routes serve the site.

60 The trip generation estimates detailed in the Transport Assessment identify sufficient patronage for a new bus route serving the site. The precise detail of the route and costs are being discussed between TfL, the applicant and the Council. It should be noted that there are a number of options being considered. The cost of rerouting and extending existing services along a new spine road would be £1.25 million and this should be secured through the section 106 agreement.

61 The spine road through the site and proposed secondary access are to be designed to facilitate a bus route which is welcomed by TfL. In addition bus stops will need to be installed approximately every 300 metres in both directions along the spine road and a new standing facility for two buses, with associated driver facilities, will need to be installed towards the south end of the development. Bus priority should be installed on the northbound carriageway of the spine road approaching the Brighton Road roundabout in the form of a short section of bus lane. This will ensure that buses do not suffer delays due to queuing at peak times and that run time variability is minimised, thus enabling a reliable service for the residents of the development. These measures which facilitate a bus route should be provided at the cost of the applicant and secured through the section 106 agreement.

Car Parking

62 Car parking for phase one of the development is proposed at an average of 2.5 spaces per unit in addition to 21 visitor spaces. The exact quantum of car parking should be clarified. This provision exceeds maximum standards detailed in the London Plan, and TfL therefore request the quantum of car parking is reduced.

63 Provision of Electric Vehicle Charging Points should be in accordance with London plan standards, with active provision for 20% of spaces and passive provision for 20% of spaces. Adequate blue badge parking should also be provided. TfL also requests consideration of a car club on site. Residents should be excluded eligibility to apply for parking permits in the nearby Controlled Parking Zone, which should be secured through the section 106 agreement. These measures should ensure compliance with London Plan policy 6.13.

64 It is understood the quantum of car parking for the employment uses and all outline aspects of the application will be detailed in a separate reserved matters application. Car parking for all uses should be in accordance with London Plan policy 6.13. TfL request consultation on any future application associated with this development.

Walking, Cycling and Accessibility

65 Cycle parking for the houses within the development is proposed within a garage or shed for each unit. The exact quantum of cycle parking should be clarified. Provision should be secured by condition and is acceptable to TfL providing the quantum of cycle parking is in accordance with London Plan policy 6.9.

66 It is understood that the quantum and location of cycle parking for the employment uses, flats and all other outline aspects of the application will be detailed in a separate reserved matters application. Cycle parking for all uses should be in accordance with London Plan policy 6.9.

Travel Plan

67 TfL welcomes the submission of a Travel Plan, which aims to promote sustainable travel to and from the site. The Travel Plan and all agreed measures therein should be secured, enforced, monitored and reviewed as part of the section 106 agreement.

Servicing and Construction

68 TfL expects the development to be supported by a Construction Logistics Plan (CLP) and a Delivery and Servicing Plan (DSP), in line with London Plan Policy 6.14. Both of these plans should be secured by condition and TfL requests consultation on the discharge of these conditions.

69 Guidance on producing CLPs is available at <http://www.tfl.gov.uk/microsites/freight/publications.aspx#logistics-plan-guidance> and the CLP document should be drafted in accordance with this guidance.

70 Further information on improving road safety through procurement is available at <http://www.tfl.gov.uk/microsites/freight/documents/improving-road-safety-through-procurement.pdf>. This should be consulted in the drafting of the DSP and CLP guidance.

Summary

71 There are a number of outstanding issues that will need to be addressed before TfL can be satisfied that the proposals are acceptable and must be satisfactorily addressed prior to the Council determining the application. Notwithstanding this, the issues raised above are capable of being resolved by the applicant through further work, planning conditions and section 106 obligations.

Community Infrastructure Levy

72 The Mayor has introduced a London-wide Community Infrastructure Levy (CIL) to help implement the London Plan, particularly policies 6.5 and 8.3 towards the funding of Crossrail. The rate for Croydon is £20 per square metre of floor space. The required CIL should be confirmed by the applicant and Council once the components of the development or phase have been finalised.

73 In addition Croydon Council has adopted its borough CIL. The Council has indicated that health, education, public open space, community facilities and projects identified in the Connected Croydon delivery programme will be funded from CIL. Transport capacity improvements are not included in Croydon's CIL Reg 123 list, and therefore any mitigation measures required as a result of development impacts need to be secured through section 106 obligations.

Local planning authority's position

74 Unknown at this stage.

Legal considerations

75 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application.

76 There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

77 There are no financial considerations at this stage.

Conclusion

78 London Plan policies on Green Belt, housing, urban design, trees, sustainable development and transport are relevant to this application. The application complies with some of these policies but not with others. The potential remedies to issues of non-compliance are set out below:

- Principle of development: Redevelopment of this derelict site is supported. Although the increase in development footprint is a concern overall very special circumstances have been demonstrated.
- Housing: The overall housing mix is supported and should be secured by the Council. The maximum reasonable amount of affordable housing needs to be verified through independent assessment. The proportion of family affordable housing needs further discussion.
- Playspace: The level of provision meets London Plan requirements and is supported. It should be secured by the Council.
- Design: The overall design quality is high.
- Energy: The hierarchy has been applied. The applicant needs to address the shortfall in Carbon Dioxide savings.
- Trees: The loss of trees is supported given the mitigation package, this should be secured by the Council.
- Agricultural use and public access: The relocation of the farm is supported as is the proposed public access. The latter should be secured by the Council
- Transport: Outstanding issues relating to site access, traffic impact, bus sponsorship, car parking cycle parking, travel planning and servicing and construction will need to be addressed before TfL can be satisfied that the proposals are acceptable and must be satisfactorily addressed prior to the Council determining the application.

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