

# Design Enhancements Report Response to Refusal of 24/000062/FUL



79 Riddlesdown Road, Purley

9<sup>th</sup> August 2024

## Key Contact Details:

Liam Brennan MCIOB

Founder & Managing Director / Certified Passivhaus Consultant

☎ +44 (0)204 526 8789

✉ [info@polarisspassivhaus.com](mailto:info@polarisspassivhaus.com)

🌐 [www.polarisspassivhaus.com](http://www.polarisspassivhaus.com)

---

# Revision History

Rev	Date	Description	Author	Approved
00	09/08/24	Design Enhancement Report	LB	LB

# Distribution

Name	Location	Date
Croydon Council	Not Applicable	09/08/24
Interested Stakeholders	Not Applicable	09/08/24

This document has been prepared by Polaris Passivhaus Developments Limited specifically for the 79 Riddlesdown Road, Purley project. Its sole objective is to detail how the Applicant has responded to the refusal received under 24/00062/FUL by enhancing the design to overcome the challenges highlighted by the Local Planning Authority.

It may not be used by any person for any other purpose other than that specified without the express written permission of Polaris Passivhaus Developments Limited. Any liability arising out of use by a third party of this document for purposes not wholly connected with the above shall be the responsibility of that party who shall indemnify Polaris Passivhaus Developments Limited against all claims, costs, damages and losses arising out of such use.

---

# Contents

Revision History + Distribution .....2

Distribution .....2

Contents .....3

1.0 Introduction.....5

    1.1 Introduction..... 5

    1.2 Summary..... 5

    1.3. Scale, Depth, Mass, Bulk, Height, and Impact on Neighbouring Properties ..... 6

    1.4 Accessibility Enhancements..... 7

    1.5 Car Parking and Refuse Storage Improvements..... 7

    1.6 CGIs for the New Proposed Development..... 8

2.0 Refusal Response + Design Enhancements.....13

    2.1 The Refusal of 24/00062/FUL.....13

    2.2 Design Enhancement Strategy .....13

    2.3 Statutory Public Consultation..... 14

    2.4 Refusal Response + Design Enhancements..... 18

# Section 1

## Introduction

---

# 1.0 Introduction

## 1.1 Introduction

- 1.1.1 This document outlines the significant design enhancements made in response to the refusal of planning application 24/00062/FUL by Croydon Council. The refusal highlighted several concerns regarding the scale, depth, mass, bulk, height, loss of outlook for neighbouring properties, perceived dominance, loss of daylight for proposed basement areas, accessibility, and private amenity space.
- 1.1.2 The Applicant has undertaken a thorough review of these concerns and made substantial modifications to the design to ensure compliance with local planning policies, The London Plan, and other relevant documentation required for a full planning application. The following sections provide a summary of the key changes made to address the reasons for refusal and enhance the overall design.
- 1.1.3 This report is intended to be read in conjunction with all other submitted documents that form part of this new planning application. Together, these documents provide a comprehensive overview of the proposed modifications, detailed plans, and justifications for the changes made in response to the previous refusal. They collectively demonstrate the Applicant's commitment to meeting all relevant planning policies, guidelines, and standards set forth by the Local Planning Authority, The London Plan, and other applicable regulations. We encourage the reviewers to consider this report alongside the full suite of supporting documentation to gain a complete understanding of the enhanced design and its benefits.

## 1.2 Summary

- 1.2.1 The Applicant has made substantial efforts to enhance the design of the proposed development, addressing the reasons for refusal and ensuring compliance with local and regional planning policies. The revised proposal aims to deliver a high-quality, sustainable, and accessible residential development that integrates harmoniously with its surroundings while providing significant benefits to future occupants. These design enhancements demonstrate the Applicant's commitment to creating a development that meets the highest standards of design and functionality.

---

## 1.3. Scale, Depth, Mass, Bulk, Height, and Impact on Neighbouring Properties

- 1.3.1 The revised proposal incorporates several changes to mitigate the impact on neighbouring properties and improve the overall design:
- 1.3.2 **Reduced Building Length and Height:** The overall length of the building has been reduced by 1 meter, and the height has been lowered. These changes help to minimise the visual impact and better integrate the building with its surroundings.
- 1.3.3 **Adjusted Footprint:** The building's footprint has been relocated 500mm closer to the access road, aligning it more closely with the neighbouring properties at 81 Riddlesdown Road at the front and 79a Riddlesdown Road at the rear. This adjustment helps to maintain a consistent building line and reduces the perceived dominance of the new structure. It also allows efficient use of previously underutilised space.
- 1.3.4 **Apartment Size and Layout:** The size and layout of the apartments have been revised to ensure compliance with the minimum space standards set by The London Plan and Building Regulations Part M. This includes the removal of one apartment, reducing the total number of units to five, which supports incremental densification without overdevelopment.
- 1.3.5 **Reduction in Windows and Removal of Balcony Openings:** To address privacy concerns, the number of windows on the south and north elevations has been reduced, with all windows now centrally placed within the building. Balcony openings on the southeast corner have been removed, further mitigating privacy concerns.
- 1.3.6 **Enhanced Daylight for Basement Apartment:** A new light well has been introduced for the basement apartment, significantly enhancing natural daylight to the rear of the proposed basement unit.
- 1.3.7 **Increased and Compliant Balcony Sizes:** Balcony sizes have been increased to comply with Local Plan Policy DM10.4, and the overall quantum of balconies has been increased. Each apartment now has its own private amenity space, accessible directly from within the units.

---

## 1.4 Accessibility Enhancements

- 1.4.1 **Step-Free Access:** The access route to the main entrance has been redesigned to incorporate a ramp, providing complete step-free access. This redesign ensures compliance with accessibility standards and enhances the usability of the development for all potential residents.
- 1.4.2 **Improved Pathway and Cycle Storage:** The pathway from the proposed drop-off point, past the parking bay and bin store, meets the minimum width requirements set by M4(3), starting at 1.2m and widening to over 1.8m between the proposed development and the boundary line. The revised pathway is now wider and more accessible, providing a smoother, more user-friendly transition to the main entrance. The entrance from the building onto the public footpath has been omitted, and cycle storage has been moved internally, further enhancing accessibility.

## 1.5 Car Parking and Refuse Storage Improvements

- 1.5.1 **Revised Car Parking Layout:** The car parking layout has been revised however, it still maintains five car parking spaces, allowing a 1:1 ratio of parking spaces to apartments. This improvement on the previous ratio, further supported by the Transport Consultant, RGP Consulting, ensures compliance with relevant policies. RGP have also confirmed that there will be no impact on the surrounding highways network.
- 1.5.2 **Enhanced Refuse Storage:** The refuse storage area has been completely overhauled. The new design includes provisions for six 240-liter waste bins (three for general waste and three for dry recycling) and a separate 60-litre wall-mounted food waste bin. Each bin has a dedicated storage area, easing waste management and ensuring compliance with Croydon Council's Waste and Recycling in Planning Policy Document and Building Regulations Part H6 (Waste storage requirements).

---

## 1.6 CGIs for the New Proposed Development















# Section 2

Refusal Response +  
Design Enhancements

---

## 2.0 Refusal Response + Design Enhancements

### 2.1 The Refusal of 24/00062/FUL

- 2.1.1 The Applicant has undertaken a comprehensive and thorough review of the Case Officer's report following the refusal of planning application 24/00062/FUL by Croydon Council. While the refusal was naturally disappointing, the feedback provided was invaluable, highlighting several key areas that required attention and improvement.
- 2.1.2 The Case Officer identified critical concerns regarding the scale, depth, mass, bulk, and height of the proposed building, as well as issues related to the loss of outlook for neighbouring properties, perceived dominance, lack of daylight for proposed basement areas, accessibility, and private amenity space.
- 2.1.3 Acknowledging the validity of some of these concerns, the Applicant has approached the redesign with a commitment to addressing each point meticulously, ensuring that the revised proposal aligns with local planning policies, The London Plan, and other relevant regulations.
- 2.1.4 The following sections of this document detail the significant modifications made in response to the Case Officer's report, demonstrating the Applicant's dedication to creating a development that is not only compliant but also sensitive to its context and the needs of future occupants.

### 2.2 Design Enhancement Strategy

- 2.2.1 The Applicant's strategy involved several key steps:
- 2.2.1.1 **Engaging with the Feedback:** The Case Officer's report highlighted important aspects that needed revision, such as the excessive scale and massing of the initial proposal. The Applicant has taken these comments seriously and has worked diligently to revise the design accordingly.
- 2.2.1.2 **Detailed Analysis and Redesign:** Each area of concern identified in the report was subjected to detailed analysis. For instance, the lack of private amenity space for one of the apartments was a significant point that the Applicant has addressed by ensuring each apartment has its own private amenity space in line with the requirements set by Local Plan Policy DM10.4.

- 
- 2.2.1.3 **Consultation and Compliance:** Ensuring that the redesign meets the standards set forth in local and regional planning policies was paramount. The Applicant has consulted with the relevant design team members, relevant guidelines and incorporated best practices to enhance the overall quality of the development.
- 2.2.2 Each modification is detailed in the relevant sections below, showcasing the Applicant's commitment to addressing the concerns raised by the Case Officer and enhancing the overall design of the proposed development. This document, along with all other submitted documents, forms a comprehensive response to the refusal and demonstrates a concerted effort to align the project with the expectations and requirements of Croydon Council and relevant planning policies.
- 2.2.3 The revised design aims to harmonise with the local context, comply with planning policies, and enhance the quality of life for future residents.

## 2.3 Statutory Public Consultation

- 2.3.1 'Section 4 Consultations' of the Case Officer Report states that:
- 4.1 *The application was advertised by way of neighbour notification letters which were sent to 16 neighbouring properties and a notice was erected immediately outside of the site.*
- The following representations were received during the statutory consultation period:*
- |                      |                        |                       |
|----------------------|------------------------|-----------------------|
| <i>Received: 210</i> | <i>Objections: 180</i> | <i>Supporting: 29</i> |
|----------------------|------------------------|-----------------------|
- 2.3.2 While the public's right to submit their viewpoints on the project is fully recognised and respected, out of the 180 recorded objections, 42 of these objections originated from individuals residing outside the local borough, with locations spanning as far as Wales and Scotland. Additionally, approximately 20 objections were repeated from the same address, further compounding any negative sentiment of the previous scheme.
- 2.3.3 Although not officially recorded as objections or endorsements within Croydon's planning system, the outpouring of community backing in response to social media outreach was truly encouraging. The compilation of these interactions offered a high-

level overview of the prevailing sentiment. Additionally, significant supporting points made by community members were highlighted and summarised below:

Description	Detail
Facebook Group	CR2 Community
Likes (made up of 'thumbs up' or 'heart' emojis)	161
Dislikes (made up of 'sad' or 'angry' emojis)	1
Key Comments	<div><div><div><div><div></div><div>Graeme</div></div><div>Looks a really nice project - I've no experience of planning in Croydon, I've heard some horror stories and don't understand why or how people from outside the borough can have any reasonable objections? Good luck.</div><div>2 d Love Reply Share</div></div><div><div><div></div><div>Marguerite</div></div><div>It does look sophisticated and in keeping with local character. I would have been much more ok with something like this being built instead of the usual soulless brown brick black window and balustrade big cubes that we now see everywhere. I now sadly have one of those growing two doors down from my beautiful 1930s house.</div><div>2 d Love Reply Share</div></div><div><div><div></div><div>Holly</div></div><div>I think this a great initiative and could serve as the blueprint for future developments, it comes across as that you have considered the wider implications and have sought to engage the local community so I hope you are able to proceed! One question though, will the flats be leasehold or commonly?</div><div>2 d Love Reply Share</div></div><div><div><div></div><div>Susan</div></div><div>We really need more homes in the UK. To house one family in a space where 6 families could reside would mean my children and grandchildren may one day be able to leave home. Many homes were built on fields and farmland and changed the aesthetics of the area. The problem we have is the government not investing and implementing infrastructure, eg Schools and Drs, transport, water services when more people live in the same space. We need to spend our energy on building the local community services. Good luck and lets hope more families get a chance of a home just like I did.</div><div>2 d Love Reply Share</div></div><div><div><div></div><div>James</div></div><div>Good luck Liam, looks a great development</div><div>2 d Love Reply Share</div></div><div><div><div></div><div>Abi</div></div><div>I dont know the site but am a Purley resident. The vile monstrosities we have built in Purley of late with nasty container looking roof attachments and all the mouldy water stains running down the outside render, this looks attractive. Your opposite flats already so they got approved! You sound approachable for genuine neighbouring property owners to contact you with any concerns. Perhaps reassurance re noise and mess would sway them. Good luck</div><div>2 d Love Reply Share</div></div><div><div><div></div><div>Holly</div></div><div>I think this a great initiative and could serve as the blueprint for future developments, it comes across as that you have considered the wider implications and have sought to engage the local community so I hope you are able to proceed! One question though, will the flats be leasehold or commonly?</div><div>2 d Love Reply Share</div></div><div><div><div></div><div>Daniel</div></div><div>Good on you. We need more passive buildings like this. The current state of building is ATROCIOUS</div><div>2 d Love Reply Share</div></div><div><div><div></div><div>Reena</div></div><div>We need more passivhaus buildings in this country. Serial objectors don't even spend time reading the application's documents sadly. Good luck</div><div>1 d Love Reply Share</div></div><div><div><div></div><div>Samantha</div></div><div>Liam Brennan I really wish you all the luck with your project.  As others have said it's refreshing for this kind of interaction with the people that your project will directly effect to be led by the person/company adding, what should be a benefit to the community.  It seems as though no one else locally has come forward to redevelop this site, so I am pleased you have - before any corporate company bears their weight and dictates what's going to happen to the locals.  Nice to see a local business doing a local project.  All the best!</div><div>17 h Like Reply Share</div></div></div></div>



Description	Detail
Facebook Group	Purley, Woodcote, Riddlesdown, & Kenly Surrey
Likes (made up of 'thumbs up' or 'heart' emojis)	82
Dislikes (made up of 'sad' or 'angry' emojis)	0
Key Comments	<p><b>Daniel</b> [redacted] Best of luck, looks like a decent development 2 d Like Reply</p> <p><b>Iryna</b> [redacted] 👉 Stunning house 👉 good luck ✨ 1 h Love Reply Edited</p> <p><b>Bear</b> [redacted] I think the development looks fantastic 2 d Love Reply</p> <p><b>Dawn</b> [redacted] Top contributor I love it!! 2 d Love Reply</p> <p><b>Karen</b> [redacted] Looks fantastic! Hope it goes ahead 2 d Love Reply</p> <p><b>Teresa</b> [redacted] I think it also looks fantastic, I really don't understand some people. Good luck I hope it goes ahead. 2 d Love Reply</p> <p><b>Jack</b> [redacted] Top contributor Looks great. Good luck. 2 d Love Reply</p> <p><b>Samantha</b> [redacted] Great post <b>Liam Brennan</b> It's without a doubt a marked improvement on the existing dwelling. I wish all the best with your application 2 d Like Reply</p>

Description	Detail
Facebook Group	Riddlesdown Community
Likes (made up of 'thumbs up' or 'heart' emojis)	10
Dislikes (made up of 'sad' or 'angry' emojis)	0
Key Comments	<p><b>Eve</b> [redacted] We live on [redacted] and I recognise where this proposal is next to the alley way, and the house that currently stands there is an absolute monstrosity! This would be a welcomed development, good luck! 1 d Love Reply Share</p> <p><b>Kelly</b> [redacted] I lived at one of the no.79's ... the [redacted] builder who developed much of the area shouldn't be a leveller for the rest. I think your proposal looks really good and that fact you've put this message 'out there' for all to comment is all credit to you. Good luck with this <b>Liam</b>, I wish you all the best. 🍀 1 d Like Reply Share</p>



- 
- 2.3.4 These unofficial comments clearly demonstrated that there was considerable support for the project. Regrettably, it appeared that some local residents who submitted objections may have been influenced by inaccuracies or misinformation about the project that were propagated within the community. It was disheartening to consider that these individuals' perceptions and decisions could have been shaped by erroneous narratives, which affected the fairness of the planning process and undermined the trust and transparency crucial to community relations. Ensuring information was disseminated responsibly and accurately was in the interest of all involved, allowing for a well-informed and authentic community response to the development.
- 2.3.5 We were very pleased to have been one of the more supported projects in the borough of Croydon, receiving **26 valid supports** from residents within the borough. Including the immediate neighbours at 79a Riddlesdown Road. This strong backing from the local community was greatly appreciated and reinforced our commitment to developing projects that benefit and align with the needs of our community.

## 2.4 Refusal Response + Design Enhancements

Case Officer Report Number	Case Officer Commentary	Polaris Passivhaus Response + Design Enhancements
<b>A. PRINCIPLE</b>		
5.7	Croydon Local Plan Policy SP2 outlines the borough's need to provide a minimum of 32,890 new homes between 2016 and 2036 (1645 per year). This policy along with Policy DM1 requires land to be used efficiently so to contribute to the maintenance of a sustainable community.	No response necessary nor design enhancement required.
5.8	Local Plan Policy DM1 seeks to enable housing choice by ensuring that redevelopment does not result in the loss of homes smaller than 130 sqm, or the net loss of 3-bedroom homes (as originally built).	The existing property is an out of character, small and dilapidated 3-bedroom home of 110m².
5.9	As noted within the previous application, the original dwelling is a 5-bedroom detached house and it is therefore considered that the principle of development is acceptable when assessed against Policy DM1 of the Croydon Local Plan as the demolition of the existing dwelling would not result in the net loss of a three-bedroom dwelling as originally built.	At the time of submitting the planning application, there had been no prior planning application on the site nor is the existing property a 5-bedroom detached house (as detailed above).  The revised scheme will not result in a net loss of a three-bedroom dwelling and is therefore still compliant with Policy DM1.
5.10	London Plan Policy H1 identifies ten-year targets for net contributions that each LPA should plan for. Croydon have been set a ten-year target to deliver 20,790 homes between the period of 2020 and 2029 (2079 per year). Section B1(b) of the policy states that boroughs should encourage development on appropriate windfall sites not identified through the plan period, especially from sources of supply listed in section B2 of the policy.	No response necessary nor design enhancement required.
5.11	Section B2(a) states that LPAs should optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m distance of a station or town centre boundary.	No response necessary nor design enhancement required.

Case Officer Report Number	Case Officer Commentary	Polaris Passivhaus Response + Design Enhancements
5.12	The application site is situated within 321m of Riddlesdown train station and is therefore considered as a site that should optimise the delivery of housing within the borough.	No response necessary, nor design enhancement required.
5.13	Given that the site complies with the aims and objectives of Local Plan Policy DM1 and also London Plan policies H1 and H2, the principles of the redevelopment of the site for an intensified residential use would be considered acceptable subject to complying with other development plan policies when assessed against the various material considerations.	We acknowledge the Local Planning Authority's acceptance that the site would be suitable for intensification. Both the previous proposal and the current proposal remain compliant with Local Plan Policy DM1 and London Plan Policies H1 and H2.
<b>B. UNIT MIX</b>		
5.14	Policy SP2.7 of the local plan states that the Council will seek to ensure that a choice of homes is available in the borough that will address the borough's need for homes of different sizes. For both market and affordable housing, this will be achieved by:  Setting a strategic target for 30% of all new homes up to 2036 to have three or more bedrooms.	No response necessary nor design enhancement required.
5.15	The proposed unit mix comprises 4 x 2-bedroom units, 2 x 3-bedroom units.	The revised proposal now comprises a unit mix of three 2-bedroom units and two 3-bedroom units.
5.16	The proposed unit mix would deliver a total amount of 33% three-bedroom units across the development site. This unit mix would be acceptable as it would result in a development that would contribute sufficiently towards the council's strategic target that 30% of all new dwellings delivered within the borough comprise of 3-bedroom family homes as set out within Local Plan Policy SP2.7.	With the reduction in overall units from six to five, the proposed unit mix now delivers 40% of three-bedroom units. This is a considerable enhancement from the previous scheme and offers complete compliance with Local Plan Policy SP2.7.
<b>C. IMPACT ON THE CHARACTER AND APPEARANCE OF THE AREA</b>		
5.17	Part B of London Plan Policy D3 seeks that developments should optimise site capacity, where located within locations that are well connected, such as the application site. This point should be balanced	The Planning Officer noted in point 5.12 that <i>"the application site is situated within 321m of Riddlesdown train station and is therefore considered as a site that should optimise the delivery of housing within the borough."</i> In line with this observation, both the previous and new proposals aim to enhance the local context by replacing the existing structure, which is

Case Officer Report Number	Case Officer Commentary	Polaris Passivhaus Response + Design Enhancements
	against Part A of the policy that also requires developments to enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance, and shape, with due regard to existing and emerging street hierarchy, building types, forms, and proportions.	generally perceived as unsightly, with a more appropriately scaled building. This new structure has been carefully designed to harmonise with the local surroundings and topography, making the most of these elements to benefit the proposed development. Our approach has been to create a building that seamlessly integrates into its environment, contributing positively to the character of the area while also addressing the need for optimised housing delivery.
5.18	Whilst the development would be sited 321m from the nearest train station, the site does have a PTAL of 1b which would therefore indicate poor access to public transport infrastructure. It is therefore considered that part C should therefore also be considered in the context of the site being defined as a 'small site' and this part of the policy refers to 'incremental densification' and an appropriate change to an existing area.	See previous note.
5.19	Local Plan Policy DM10 seeks that development proposals should respect the development pattern, layout, siting, scale, height, massing, density, and appearance of the place in Croydon in which it is located.	No response necessary nor design enhancement required.
5.20	Whilst some apartment blocks are present within the street, the area is characterised by 2-storey detached dwellings, set in large plots with front and rear gardens, particularly along the stretch of Riddlesdown Road where the application site is located.	No response necessary nor design enhancement required.
5.21	The land falls from the south to the north along Riddlesdown Road. The rear gardens on this side of the street slope down to the south, away from the rear elevations of the houses. The rear building line along this part of Riddlesdown Road is fairly consistent. Whilst the detailed design of dwellings in the area is varied, there is consistency in their scale and mass. The generous plots, along with the topography and far-reaching views to the west, give the area a spacious and verdant character and appearance.	No response necessary nor design enhancement required.
5.22	The proposal would replace the existing dwelling with a 4-storey building containing six flats. The building would read as two storeys from the street, with the 4 storeys apparent from the rear due to the change in land levels and the significant amount of excavation proposed.	As detailed further under point 5.22 below, the scheme has been revised to comprise five apartments. The front elevation has been adjusted in height, bringing it to just under 2-storeys, while the rear has been revised to 3-storeys. No significant excavation is currently proposed.

Case Officer Report Number	Case Officer Commentary	Polaris Passivhaus Response + Design Enhancements
5.23	<p>The significant amount of excavation to the rear along with the significant amount of engineering across the site, in the form of retaining walls, would be out of scale with the buildings in the surrounding area. The four storeys projecting significantly beyond the prevailing rear building line along this part of Riddlesdown Road would result in a bulk and mass that would be overly dominant and at odds with the character and appearance of the area.</p>	<p>We acknowledge the observation regarding the significant amount of excavation and engineering initially proposed, particularly concerning the retaining walls and the scale of the development relative to the surrounding area. Recognising these concerns, the applicant has made substantial revisions to the design to ensure a more harmonious integration with the site and its surroundings.</p> <p>To address the issue of excessive engineering, the revised design has removed one of the basement apartments, resulting in a reduction in the overall depth of the building. This adjustment effectively eliminates the need for extensive engineering works, reducing them to the point of being non-existent. It's important to note that any new development would require a basic level of foundation support, which would involve the same level of works regardless. Additionally, the redesign of the structure has reduced its depth, ensuring that the rear elevation now aligns with the neighbouring property at 79a Riddlesdown Road. These changes have significantly improved the rear elevation, effectively eliminating the need for large-scale engineering works that may have impacted the site's character.</p> <p>It is important to note that the revised rear elevation will have limited visibility to both the public and neighbouring properties. As demonstrated by the accompanying photographs below, the boundary treatment—comprising hedges and a 1.80m high fence—will effectively block any views into the site from the public footpath. Additionally, the retained trees at the rear of the property will further restrict visibility from the gardens of neighbouring properties along Riddlesdown Avenue. These natural and structural elements ensure that the revised development remains in keeping with the character and appearance of the area while addressing the initial concerns about scale and massing.</p> <p>Existing view up the footpath (looking Northwest):</p> 

Case Officer Report Number	Case Officer Commentary	Polaris Passivhaus Response + Design Enhancements
		<p>View from the 2<sup>nd</sup> floor of the existing building (i.e. the same level of level 2 of the new proposed development):</p> 
5.24	Furthermore, the exiting land levels and rear gardens of the dwellings along Riddlesdown Road are designed to create a more natural change in topography across their respective sites. The overengineering of the site is at complete odds with this positive characteristic that contributes positively to the existing suburban context, resulting in significant harm.	The revisions to the design have effectively removed the need for extensive engineering work, addressing and mitigating the concerns previously raised. As a result, the issue of significant engineering interventions is no longer relevant to the current proposal, ensuring that the development is more in line with both the physical constraints of the site and the expectations for minimal impact on the surrounding area.
5.25	Whilst it is acknowledged that the bulk and mass would not be highly visible from many public vantage points, there are views into the site from Riddlesdown Road and along the footpath that runs adjacent to the site. Views of the appeal site are available through the gap between the application site and No. 81 Riddlesdown Road from where the depth of the proposed building would be of a much larger scale and therefore at odds with the other buildings in the area. This would be exacerbated further by the removal of the existing hedge line that runs parallel to the application site as well as the flank elevation being built up to the public pathway.	As illustrated in the previously provided photos, the mass of the proposed development would be effectively screened from any public vantage points. Walking up the steep footpath the appearance of the rear of the newly proposed building would appear like a 2-storey structure, as it is at the front. The existing hedge, which provides significant visual coverage, will be either retained or reinstated, ensuring continuity in the landscape. Additionally, there is a 1.8-meter boundary fence positioned behind the hedge, further enhancing privacy. As a result, views from the footpath will closely resemble the current arrangement, maintaining the visual character and screening that currently exists.

Case Officer Report Number	Case Officer Commentary	Polaris Passivhaus Response + Design Enhancements
5.26	The character of the area is informed by the pattern of development, which is not necessarily visible from the street, and the proposal would be highly visible from rear gardens and from surrounding houses.	As detailed under point 5.23 "It is important to note that the revised rear elevation will have limited visibility to both the public and neighbouring properties. As demonstrated by the accompanying photographs, the boundary treatment—comprising hedges and a 1.80m high fence—will effectively block any views into the site from the public footpath. Additionally, the retained trees at the rear of the property will further restrict visibility from the gardens of neighbouring properties along Riddlesdown Avenue. These natural and structural elements ensure that the revised development remains in keeping with the character and appearance of the area while addressing the initial concerns about scale and massing."
5.27	<p>The proposals would be much deeper in plan than the neighbouring properties and those which exist along this section of Riddlesdown Road. Furthermore, the car parking area would result in a regimented layout across the entire site frontage. Whilst parking does exist within front gardens, these are within a more informal arrangement, with examples of hardstanding combined with front gardens which soften the hardstanding and as a result contribute to the suburban character of the site. The presence of a parking area across the entire frontage would be at odds with the suburban characterises of the area and therefore harmful.</p>	<p>Please refer to point 5.23 in relation to depth of the proposed building and the revisions made to the new planning application.</p> <p>The car parking arrangement proposed for the development is consistent with the existing pattern observed along the access road of Riddlesdown Road. Most properties in this area, including the immediate neighbours from 79a onwards, feature parking provisions on the frontage, which is a common characteristic of the street. This pattern is mirrored on the opposite side of the road as well, ensuring that the proposed parking design aligns with the established streetscape. For further context, please refer to the images provided below, which illustrate the typical parking arrangements in the vicinity.</p>  <p>Circa 25m north along the access road of the proposed development.</p>  <p>Circa 25m north along the access road of the proposed development.</p>



Case Officer Report Number	Case Officer Commentary	Polaris Passivhaus Response + Design Enhancements
		 <p>Directly opposite the proposed development.</p>  <p>Directly opposite the proposed development.</p>
5.28	Policy DM10.1 of the Croydon Local Plan 2018 (CLP) also sets out an expectation of a minimum of three storeys for new development on brownfield sites. This is, however, subject to the surrounding context. In this case, the local pattern of development and the scale, height and massing of the immediate area are such that the proposal's height and bulk would be out of context, and it would fail to respond to the prevailing pattern and form of development.	As noted under point 5.33, the Case Officer observed that "the proportions of the building appear appropriate from the front of the site." However, the assessment here appears to differ. To address the feedback and ensure consistency, we have made significant adjustments to the rear of the building, specifically reducing its form, scale, and mass. These changes were made in direct response to the comments provided by the Case Officer, demonstrating our commitment to aligning the development with the overall guidance and ensuring it fits seamlessly within its surroundings.
5.29	Policy DM10.1 of the CLP which requires new development to respect the appearance, materials and built features of the surrounding area.	No response necessary nor design enhancement required.
5.30	Whilst the materials of the building would be consistent with the surrounding area, the fenestration layout, in terms of the detailed design and use of materials, despite the variety of styles and building forms in the area, the proposals do not offer a respectful design	This point appears to lack some consistency and could benefit from further clarification.



Case Officer Report Number	Case Officer Commentary	Polaris Passivhaus Response + Design Enhancements
	approach. The absence of harm identified in relation to the detailed design holds neutral weight in my determination of the appeal.	
5.31	Furthermore, Local Plan Policy DM10.7 seeks that roof forms are designed so that they contribute positively to the character of the surrounding area. Whilst the proportions of the building appear appropriate from the front of the site, the roof form to the rear of the property, due to the four storey nature of the development in this location, appears squat in form and out of proportion with the overall scale and height of the building, resulting in harm as the roof form fails to deliver a design that positively contributes to the existing character roof the surrounding area.	The reduction in the number of floors on the rear elevation has resulted in a more balanced and proportionate appearance in relation to the overall roof structure. This adjustment ensures that the building maintains a harmonious visual profile, with the rear elevation complementing the scale and design of the roof. The revised proportions create a cohesive aesthetic that is in keeping with the surrounding architecture, enhancing the building's integration within the existing streetscape and minimising any potential visual impact. This thoughtful redesign underscores our commitment to delivering a development that is both visually appealing and contextually appropriate.
5.32	Furthermore, the fenestration layout and use of side 'main' entrances to dwellings has little relationship to the existing context and the use of Juliet balconies to the front elevation of the property is a feature that is incongruous with the existing features that contribute to the existing character.	The Juliet balconies have been omitted as part of the new proposal.
5.33	For the reasons set out above, the proposal would harm the character and appearance of the area and would conflict with Croydon Local Plan Policies SP4 and DM10 and London Plan Policy D3.	No response necessary nor design enhancement required.
<b>D. IMPACT ON THE ADJOINING OCCUPIERS</b>		
5.34	Local Plan Policy DM10.6 seeks that development proposals should ensure that the amenity of the occupiers of adjoining buildings are protected and that they do not result in significant loss of existing sunlight or daylight levels of adjoining occupiers.	No response necessary nor design enhancement required.
5.35	The immediate adjoining occupiers which will be affected by the proposed development are numbers 79A and 81 Riddlesdown Road.	No response necessary nor design enhancement required.
5.36	Number 79A Riddlesdown Road is located to the immediate boundary to the northern side of the site. Whilst the dwelling is single storey when viewed from the front, the rear of the property comprises two full stories to the rear.	No response necessary nor design enhancement required.
5.37	In comparison to the existing arrangement, the proposed development would result in a much deeper building. Whilst it is noted that number 79A	This has been addressed previously with design improvements implemented.

Case Officer Report Number	Case Officer Commentary	Polaris Passivhaus Response + Design Enhancements
	Riddlesdown Road comprises of a dwelling that is sited deeper within its respective plot, the existing building at number 79 Riddlesdown Road, does not comprise a scale or mass that is comparable to that proposed.	
5.38	The scale of the development would result in a building that would be visually intrusive when viewed from the neighbouring property and garden which would provide a sense of enclosure due to the changes in levels and siting of buildings between the development and neighbouring site.	This has been addressed previously with design improvements implemented.
5.39	<p>Whilst there is a public pathway between the properties known as 79 and 81 Riddlesdown Road, the applicants diagram demonstrates that the building line has been based on the limits of the 45-degree line taken from the closest neighbouring window at number 81. Whilst the development would meet the BRE guidance in this regard and provides some separation due to the public footpath, the scale and height of the proposals would result in an overbearing structure and perceived massing that would be dominant and oppressive to the adjoining occupiers.</p>	<p>We respectfully disagree with the characterisation that the proposed development as an overbearing structure with excessive perceived massing. While we acknowledge the importance of ensuring that new developments are in harmony with their surroundings, the re-design of this project has been meticulously refined to address potential concerns regarding scale and impact on neighbouring properties.</p> <p>The revised design has taken into account the spatial constraints set by various policies, ensuring that the structure is as compact as physically possible while still meeting the requirements for functionality and design. It is important to note that the properties along Riddlesdown Road, including the existing dwelling at 79 Riddlesdown Road, are predominantly two-storey. The proposed development respects this context, with the only increase in height resulting from a shallow pitched roof that rises to 1.8 meters, compared to the flat roof of the existing house. Importantly, the proposed eaves height of 5.1 meters is lower than the existing house's eaves height of 5.65 meters, which is due to the parapet around the current flat roof.</p> <p>The height is in keeping with the street scene, as demonstrated in the existing and proposed street scene drawings. The ridge height of the new development has been carefully designed to maintain a seamless transition between 79a and 81 Riddlesdown Road, ensuring that the new structure integrates well with the surrounding properties. Furthermore, as illustrated in drawing P-005 - Proposed Side Elevations, the new roofline sits comfortably in relation to 81 Riddlesdown Road, without imposing on the neighbouring property.</p> <p>Additionally, the new structure has been positioned to sit a further 1 meter away from the current existing arrangement, as detailed in the Design and Access Statement. This increased spatial separation enhances the uniformity of the street scene, creating a more open and balanced space between 79a and 79 Riddlesdown Road. The thoughtful consideration given to these design elements underscores our commitment to ensuring that the proposed development complements its surroundings while providing a modern and functional living space.</p>


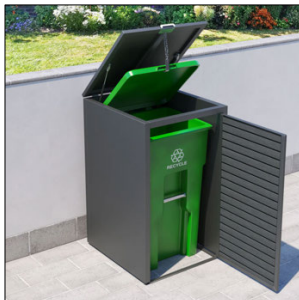

Case Officer Report Number	Case Officer Commentary	Polaris Passivhaus Response + Design Enhancements
5.40	Overall, it is considered that this overbearing and dominant form of development would fail to comply with Local Plan Policy DM10.6 (part A), due to the significant harm that would arise to the neighbouring amenity, as a result of the proposed development.	This has been addressed previously with design improvements implemented.
5.41	Whilst a number of properties exist along Riddlesdown Avenue to the rear of the site, these are sited a significant distance away from the proposals. The outlook and daylight which currently serves these units would not be unreasonably harmed by the proposed development.	No response necessary nor design enhancement required.
5.42	For the reasons set out above, the proposals are considered to fail the tests of Local Plan Policy DM10.6 as significant harm would arise to the neighbouring amenity that would be unacceptable.	No response necessary nor design enhancement required.
<b>E. QUALITY OF ACCOMODATION</b>		
5.43	Whilst London Plan Policy D6 sets out the minimum space standards which developments must adhere to, the Housing Design Standards LPG sets best practice standards and provides further guidance on how developments can achieve a high quality of accommodation for future occupiers of the development by providing public and private spaces which are of the highest design standard.	No response necessary nor design enhancement required.
5.44	London Plan Policy D6 part C states that housing development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings.	No response necessary nor design enhancement required.
5.45	London Plan Policy D7 seeks that developments should consider London's diverse borough and should therefore ensure that at least 10% of dwellings should meet the M4(3) Building Regulation Requirement for 'wheelchair user dwellings. All other units should meet Building Regulation M4(2).	No response necessary nor design enhancement required.
5.46	Policy SP2.8 of the CLP states that the Council will seek to ensure new homes will require all new homes to achieve the nationally described space standards. This position is emphasised by London Plan Policy D6 and supported further by the Housing Design Standards London Plan Guidance (LPG) (2023).	No response necessary nor design enhancement required.

Case Officer Report Number	Case Officer Commentary	Polaris Passivhaus Response + Design Enhancements																																																
5.47	Local Plan Policy DM10.4 requires 5sqm of private amenity space should be provided for each 1-2-person unit with 1sqm per extra occupant thereafter. All flatted developments should also provide a minimum of 10sqm of children's play space.	No response necessary nor design enhancement required.																																																
5.48	As stated above, the proposed units should be designed in line with the standards set out in the Nationally Described Space Standards (NDSS) and the London Plan Housing SPG, particularly regarding minimum floor space standards (including minimum sizes and widths for rooms/storage).	No response necessary nor design enhancement required.																																																
5.49	The table above demonstrates that the proposed development would comply with the minimum space standards set out within London Plan Policy D6. Whilst it is noted that the above table indicates that the units would fall slightly short of the storage requirements, the floorplans indicate that there would be substantial room for wardrobes which would also be considered appropriate as storage areas and would make up for the minimal shortfall.	<div>Please refer to the updated table below:</div> <table><tr><th>Unit</th><th>Size (bedroom/p erson</th><th>GIA (m²) Proposed</th><th>Min. GIA Required (m²)</th><th>Amenity Space Proposed (m²)</th><th>Min. Amenity Space Required (m²)</th><th>Built-In Storage Space Proposed (excluding built-in wardrobes)</th><th>Built-In Storage Space Required (m²)</th></tr><tr><td>1</td><td>2B 4P</td><td>80.00</td><td>70.00</td><td>32.00</td><td>7.00</td><td>3.10</td><td>2.00</td></tr><tr><td>2</td><td>3B 4P</td><td>80.00</td><td>74.00</td><td>17.00</td><td>7.00</td><td>2.85</td><td>2.50</td></tr><tr><td>3</td><td>2B 3P</td><td>64.00</td><td>61.00</td><td>7.00</td><td>6.00</td><td>1.90</td><td>1.50</td></tr><tr><td>4</td><td>3B 4P</td><td>80.00</td><td>74.00</td><td>7.00</td><td>7.00</td><td>2.85</td><td>2.50</td></tr><tr><td>5</td><td>2B 4P</td><td>74.00</td><td>70.00</td><td>7.00</td><td>7.00</td><td>2.85</td><td>2.00</td></tr></table>	Unit	Size (bedroom/p erson	GIA (m²) Proposed	Min. GIA Required (m²)	Amenity Space Proposed (m²)	Min. Amenity Space Required (m²)	Built-In Storage Space Proposed (excluding built-in wardrobes)	Built-In Storage Space Required (m²)	1	2B 4P	80.00	70.00	32.00	7.00	3.10	2.00	2	3B 4P	80.00	74.00	17.00	7.00	2.85	2.50	3	2B 3P	64.00	61.00	7.00	6.00	1.90	1.50	4	3B 4P	80.00	74.00	7.00	7.00	2.85	2.50	5	2B 4P	74.00	70.00	7.00	7.00	2.85	2.00
Unit	Size (bedroom/p erson	GIA (m²) Proposed	Min. GIA Required (m²)	Amenity Space Proposed (m²)	Min. Amenity Space Required (m²)	Built-In Storage Space Proposed (excluding built-in wardrobes)	Built-In Storage Space Required (m²)																																											
1	2B 4P	80.00	70.00	32.00	7.00	3.10	2.00																																											
2	3B 4P	80.00	74.00	17.00	7.00	2.85	2.50																																											
3	2B 3P	64.00	61.00	7.00	6.00	1.90	1.50																																											
4	3B 4P	80.00	74.00	7.00	7.00	2.85	2.50																																											
5	2B 4P	74.00	70.00	7.00	7.00	2.85	2.00																																											
5.50	In terms of compliance with DM10.4 in relation to the delivery of private amenity space, the units would fall short in complying with this policy requirement and unit 5 would not delivery nay private amenity space for future occupiers of the development which would be unacceptable. Whilst it is noted that there is a substantial amount of communal amenity space provided to the rear of the site, the policy is explicit in stating that private and communal amenity space must be delivered of schemes comprising flats. The proposals are therefore unacceptable in this regard.	The design has been updated to fully resolve this issue. Now, each apartment is provided with its own private amenity space, ensuring full compliance with Policy DM10.4. This enhancement not only meets the policy requirements but also significantly improves the quality of living for future occupants by offering dedicated outdoor spaces. These changes reflect our commitment to aligning the development with all applicable standards and delivering a high-quality living environment that addresses the needs and expectations of future residents.																																																
5.51	In terms of offering suitable daylight and outlook, the units within the lower and upper basement levels would result in a living and kitchen area that is deep in plan which is single aspect. This would result in a development that would fail to comply with the aims and objectives of London Plan Policy D6 in relation to the delivery of high-quality dual aspect units. Furthermore, a number of the upper floor units	In response to the concerns raised regarding daylight and outlook, we have made significant design adjustments to address these issues. One of the basement levels has been omitted, and the remaining basement level has been raised to a higher elevation. This adjustment enhances the quality of light and outlook for the basement apartment. Additionally, we have introduced an extra light well on the south elevation of the building. This placement is strategic, as the south-facing aspect will ensure that the light well benefits from good daylight throughout most of the day, significantly improving the natural light levels within the apartment.																																																

Case Officer Report Number	Case Officer Commentary	Polaris Passivhaus Response + Design Enhancements
	comprise of bedrooms that would rely of side facing windows. Due to the impact on neighbouring privacy, these would need to be obscure glazed resulting in minimal outlook for the future occupiers using these habitable rooms. This would provide an inadequate quality of accommodation for future occupiers of the development that fails to comply with Local Plan Policy DM10 and London Plan Policy D6.	<p>To further maximise the amount of reflected light into the basement apartment, we have selected a light-coloured material palette, including white rendered walls. This choice not only enhances the aesthetic appeal but also optimises the light reflection within the space, creating a brighter and more inviting living environment.</p> <p>Regarding the upper floor units, while some bedrooms may require obscure glazing due to privacy concerns, we have carefully designed these spaces to ensure that they still provide a comfortable living environment. The overall layout and window placements have been thoughtfully considered to balance privacy with the need for natural light, adhering to the aims and objectives of both London Plan Policy D6 and Local Plan Policy DM10. Our revised approach ensures that the development meets high standards of accommodation quality, providing future occupants with a well-lit and pleasant living space.</p>
5.52	The proposed development also fails to offer a legible layout with various access points and entrances sited across the site. Future occupiers of the development would be required to navigate various steps and would not be afforded a through route from the site out to the rear communal garden area. The proposed layout would not be functional for future occupiers of the development and would conflict with Local Plan Policy DM10.2 which states that proposals should create clear, well defined, and designed public and private spaces.	<p>We respectfully disagree with the assessment regarding the layout and access points of the proposed development. The design has been carefully considered to ensure simplicity and functionality for future occupants. In the revised design, access to the communal garden area is provided via a single, straightforward route, which simplifies navigation and enhances the legibility of the layout. This approach is as effective as providing a through route, while also maintaining the necessary compact structural form of the development.</p> <p>The decision to consolidate access routes was made to avoid unnecessary loss of space to the apartments and to preserve the integrity of the building's design. By focusing on a clear and direct access point, we ensure that the communal spaces are easily reachable without compromising the overall layout or usability of the site.</p> <p>In this context, the design aligns with the objectives of Local Plan Policy DM10.2, which emphasises the creation of clear, well-defined, and well-designed public and private spaces. The layout as proposed strikes an appropriate balance between functionality and design efficiency, ensuring that future occupants will enjoy a coherent and accessible environment.</p>
5.53	A communal amenity space with an associated child's play space area. This arrangement would meet the requirements of Local Plan Policy DM10.4	No response necessary nor design enhancement required.
5.54	A lift is not provided on site. London Plan Policy D7 seeks that only in exception circumstances the provision of a lift may not be achievable in four storeys or less. The supporting documents have provided no evidence to suggest why a lift cannot be achieved within this particular development. Whilst the applicant has provided drawings suggesting that the scheme could deliver M4(3) accommodation, future occupiers would be expected to navigate a short and undesignated part of the forecourt between a refuse store and parking	Please refer to Section 2.2 of the report titled "DCR-001-00 - Design Compliance Report - Approved Document M" for a detailed rationale for excluding a lift installation.

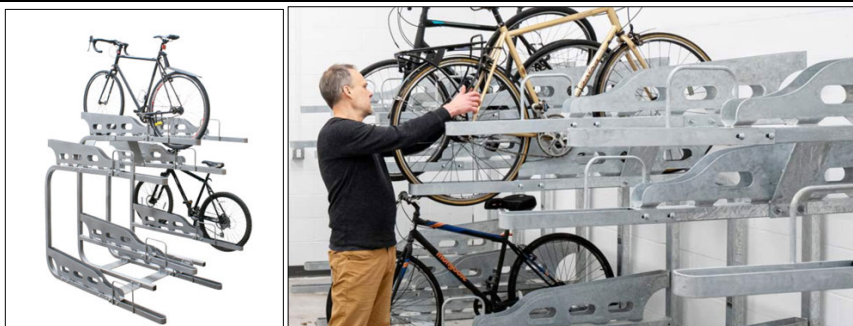
Case Officer Report Number	Case Officer Commentary	Polaris Passivhaus Response + Design Enhancements
	space to a narrow alley. An external stairlift would then provide step free access to the unit on the lower ground floor level. This arrangement is completely inappropriate and unfit for potential disabled users of the site.	
5.55	Furthermore, the lack of a lift would not allow the remainder of the development to comply with the M4(2) buildings and would also fail to allow occupiers to have step free access availed from the front of the building and into their own private and communal amenity areas	Please refer to Section 2.2 of the report titled "DCR-001-00 - Design Compliance Report - Approved Document M" for a detailed rationale for excluding a lift installation.
5.56	Overall, it is considered that the proposed accommodation is of an inadequate quality, which fails to comply with London Plan policies D6 and D7 and Local Plan Policy DM10.	This has been addressed previously with design improvements implemented.
<b>F. IMAPCT ON HIGHWAYS</b>		
5.57	London Plan Policy T6 sets the maximum amount of car parking a development site can provide based on its PTAL. In sites with a PTAL 1b a maximum level of car parking should be 1.5 spaces per dwelling regardless of how many bedrooms are being provided. This would therefore result in a maximum parking provision of nine spaces on site.	Please refer to RGP Consulting's Transport Rebuttal and updated Transport Statement and Travel Plan Statement.
5.58	Whilst the development proposals should comply with the London Plan Parking Standards, development and any overspill car parking generated by development should be given consideration in the context of Local Plan Policy DM29 and reduce the impact of car parking in areas which have existing elevated levels of on-street parking stress.	Please refer to RGP Consulting's Transport Rebuttal and updated Transport Statement and Travel Plan Statement.
5.59	The site is located within an area of extremely poor transport accessibility (PTAL rating 1b). The proposals seek to provide one long crossover to provide five parking spaces.	Please refer to RGP Consulting's Transport Rebuttal and updated Transport Statement and Travel Plan Statement.
5.60	It is noted that the site falls within an area where the PTAL is 1b (very poor) and when assessed against London Plan Policy T6, the maximum parking provision allowed on the site would be nine spaces. Due to the sites inaccessible location, officers would expect that the maximum level of parking is delivered on site due to reliance of cars by future occupiers of the development.	Please refer to RGP Consulting's Transport Rebuttal and updated Transport Statement and Travel Plan Statement.
5.61	The parking surveys and census data submitted has been reviewed by the Transport officers at the council	Please refer to RGP Consulting's Transport Rebuttal and updated Transport Statement and Travel Plan Statement.

Case Officer Report Number	Case Officer Commentary	Polaris Passivhaus Response + Design Enhancements
	however, these surveys and data are not considered appropriate in the context of the application and the sites location.	
5.62	The applicants have submitted Census data to show a lower level of car parking however, concerns are raised over the area chosen. A substantial proportion of the area selected is located has a much higher PTAL and is therefore not comparable.	Please refer to RGP Consulting's Transport Rebuttal and updated Transport Statement and Travel Plan Statement.
5.63	Furthermore, the assessment has only been undertaken on 1-3 habitable rooms basis which is not appropriate given the proposed plots will be larger than 3 habitable rooms. Furthermore, the parking survey covers a greater area than would be expected for drivers to park and walk to the site and this could therefore impact the immediate accumulation of on-streetcar parking stress levels.	Please refer to RGP Consulting's Transport Rebuttal and updated Transport Statement and Travel Plan Statement.
5.64	The supporting information has also failed to consider whether parking is appropriate along the existing road. For example, the surveys show sufficient space along both sides of Riddlesdown Road and Riddlesdown Avenue, and whilst it is appreciated the road is unrestricted, parking on both sides of the road would have significant impacts upon the operation of the corridor and as such would not be supported.	Please refer to RGP Consulting's Transport Rebuttal and updated Transport Statement and Travel Plan Statement.
5.65	The submission includes tracking of vehicles into and out of spaces. The tracking has been undertaken using 'dry steering' which is not generally accepted, and this is more critical where spaces are tight. The most northern space has less than 5m manoeuvring space to the rear which is significantly less than the required 6m for parking spaces. Furthermore, even with dry steering, the vehicle using this space would still overhang the grass verge to the rear which is on a gradient. The proposed parking layout is therefore unacceptable.	Please refer to RGP Consulting's Transport Rebuttal and updated Transport Statement and Travel Plan Statement.
5.66	As such the application does not demonstrate that the proposal would not exacerbate existing parking problems in the area and therefore the proposal does not accord with Policies SP8.1, DM29 and DM30 of the Croydon Local Plan (2018) and 6.12 and 6.13 of the London Plan 2015 (consolidated with alterations since 2011).	Please refer to RGP Consulting's Transport Rebuttal and updated Transport Statement and Travel Plan Statement.

Case Officer Report Number	Case Officer Commentary	Polaris Passivhaus Response + Design Enhancements
<b>F. IMPACT ON HIGHWAYS - REFUSE</b>		
5.67	Policy DM13 requires the design of refuse and recycling facilities to be treated as an integral element of the overall design.	This has been addressed below with design improvements implemented.
5.68	<p>The proposed refuse store is not acceptable. The council's waste guidance seeks that refuse stores, containing communal bins, provides a minimum of 2m access door and 2m cleared access route which has not been provided. The proposed arrangements would not provide an accessible or suitable space for the storage of waste. The drawings also fail to demonstrate that the store would be capable of offering an area that could hold the number of receptacles required for a development of this scale.</p>	<p>We acknowledge that the previously proposed refuse storage solution was not fully fit for purpose and appreciate the feedback provided. In response, we have undertaken a significant overhaul of the bin storage arrangements to ensure they meet the necessary standards and are fully compliant with both Croydon's Waste and Recycling in Planning Policy Document, local planning policies, and building regulation requirements.</p> <p>The current proposal now includes six individual waste storage units, each designed to house three 240-litre general waste bins and three 240-litre dry recycling bins. Additionally, a 60-litre wall-mounted food waste bin is proposed, as illustrated in the photos below. These changes ensure that the refuse storage is adequately sized and accessible, providing a suitable and compliant solution for the development.</p> <p>Regarding the 2m access rule referenced, it is important to clarify that this rule does not apply in this instance. The rule specifies that there must be a minimum of 150mm clearance around and between each bin within a storage area, and where multiple bins are present, there must be 2m clearance in front of each bin to enable safe access and movement. However, since each bin will have its own dedicated storage area, the need for 2m clearance in front of each bin is negated.</p> <p>Furthermore, the 1.2m space between the bin store and the first car parking space provides ample room to manoeuvre a 240-litre wheelie bin. This ensures that waste collection can be conducted safely and efficiently without any obstructions. We believe that the revised refuse storage arrangements fully address the concerns raised and provide a practical and compliant solution for the proposed development.</p> <div>    </div>



Case Officer Report Number	Case Officer Commentary	Polaris Passivhaus Response + Design Enhancements
<b>F. IMPACT ON HIGHWAYS - CYCLE</b>		
5.69	Policy DM30 and London Plan Policy T5 would require provision of a total of twelve cycle parking spaces (2 per unit). These should be sheltered and secured whilst also complying with the requirements of the London Cycle Design Standards.	Please refer to RGP Consulting's Transport Rebuttal and updated Transport Statement and Travel Plan Statement.
5.70	The London Plan sets out the requirements for cycle provision. For six units, this would require a minimum of twelve cycle spaces. These have been shown on the rear garden and have been sporadically laid out. Furthermore, two visitor spaces are proposed partially down the stairs which provide a side access to the unit on the northern side of the property.	Please refer to RGP Consulting's Transport Rebuttal and updated Transport Statement and Travel Plan Statement.
5.71	Whilst it is noted that an external access is provided into the amenity area from the existing public footpath that runs adjacent to the site, this would offer an inaccessible location for the cycle storage area. Residents would have to access the pathway, deposit their bikes, and then leave the site or access the rear side access to re-enter the building. This arrangement would also fail to offer a 1.2m wide route for wider and adaptable bikes or offer a gradient of less than 1:12 across the site.	<p>We acknowledge the points raised by the Planning Officer regarding the accessibility and location of the cycle storage area. In response to these concerns, we have made significant improvements as part of the overall redesign, including the removal of the 'through-route' to the public footpath. This change has allowed us to allocate a more suitable and accessible space within the development for an internal, secure cycle store.</p> <p>The new cycle storage area is designed to accommodate seven dedicated long-stay cycle spaces, ensuring convenient access and security for residents. Additionally, the two apartments with their own private extended communal space (basement and ground floor) will each be provided with two private cycle storage racks, bringing the total to eleven long-stay bicycle spaces within the building.</p> <p>Further enhancing the development's provision for cyclists, an additional three secure long-stay storage spaces are provided at the rear of the communal garden. This location offers convenient access to the public footpath and local cycle routes, making it easy for residents to integrate cycling into their daily routines. Additionally, two short-stay visitor cycle spaces are located outside the communal entrance, providing ample parking for guests.</p> <p>In total, the development under these new proposals offers an impressive sixteen cycle storage spaces, far exceeding the minimum requirements. This redesign not only addresses the accessibility issues but also demonstrates our commitment to encouraging sustainable transportation options for all residents.</p>

Case Officer Report Number	Case Officer Commentary	Polaris Passivhaus Response + Design Enhancements
		 <p>Images sourced from: <a href="https://www.dero.com/product/dero-duplex/">https://www.dero.com/product/dero-duplex/</a>. This is the proposed product for use in our internal long stay bicycle storage solution.</p>
5.72	The proposed cycle storage arrangements would fail to offer a secure, enclosed, or accessible storage area for future occupiers of the development. The proposed arrangement therefore results in a development that fails to comply with London Plan Policy T5.	This has been addressed previously with design improvements implemented.
<b>F. IMPACT ON HIGHWAYS – SUSTAINABLE TRANSPORT</b>		
	The application site is located in a PTAL 1b area which clearly demonstrates its poor access to public transport. Local Plan Policy SP8.3 promotes the use of public transport and SP8.12 states that the Council and its partners will enable the delivery of electric vehicle charging infrastructure throughout the borough to improve air quality and decarbonise private transportation over the plan period. Furthermore, Local Plan Policy SP8.13 states that new development will be required to contribute to the provision of electric vehicle charging infrastructure, car clubs and car sharing schemes.	The proposed development intends to provide five dedicated EV charging points.
	It is therefore considered that the development site would need to contribute towards suitable improvements to sustainable travel infrastructure and discouraging use of the private car in order to comply with the above policy objectives.	No response necessary nor design enhancement required.

Case Officer Report Number	Case Officer Commentary	Polaris Passivhaus Response + Design Enhancements
	A S106 contribution is therefore required at a rate of £1500 per unit which would be put towards improvements to sustainable transport including but not limited to on streetcar clubs with EVCP's as well as EVCP's in general as per the aforementioned policies within the Local Plan. The funding will also go towards traffic orders at around £2500, signing, lining of car club bay, EVCP provision including electrics and set up costs for the car club and the general expansion of the EVCP network in the area of the application. Funding will also be used for extensions and improvements to walking and cycling routes in the area.	Noted and agreeable.
	In the event of planning permission being granted this S106 contribution is necessary for the development to be considered acceptable however, as the application is recommended for refusal, a reason based on the lack of a S106 in this regard has been recommended for the purposes of the decision notice.	Noted and agreeable.
	Based on the above, the proposed development would comply with London Plan policies T5 and T6 and Local Plan policies DM29 and DM30 however, due to the lack of a Section 106 agreement in relation to sustainable transport contributions, the development would fail to comply with Local Plan Policies SP8.3, SP8.12 and SP8.13.	No response necessary nor design enhancement required.
<b>G. ECOLOGY AND TREES</b>		
	Local Plan Policy DM28 seeks the protection and enhancement of the borough's woodlands, trees and hedgerows by ensuring that all development proposals accord with the recommendations of BS5837 2012 (Trees in relation to design, demolition and construction) or equivalent and not permitting development that results in the avoidable loss, future avoidable loss, or the excessive pruning of preserved trees or retained trees where they make a contribution to the character of the area.	No response necessary nor design enhancement required.
	The LPA are concerned by the number of trees that would be removed and the impact this could have on the suburban character of the area. That said, none of the trees on site are protected which limits the weight the LPA can place on their continued protection.	We understand the concerns raised by the LPA regarding the removal of trees and the potential impact this could have on the suburban character of the area. However, it is important to note that the Biodiversity Net Gain (BNG) calculations, the Arboricultural Impact Assessment and Method Statement and the Urban Greening Factor calculations all indicate a significant enhancement to the site's biodiversity and ecological value.

Case Officer Report Number	Case Officer Commentary	Polaris Passivhaus Response + Design Enhancements
		<p>Specifically, the proposal involves the removal of only three trees, all of which have been assessed as having low value. In place of these, we are committed to planting an additional eleven trees of better-quality species. This represents a net gain of eight trees, which equates to a 267% increase in the number of trees on the site, enhancing the overall tree canopy and contributing positively to the local environment. The replacement ratio is more than 3:1, which underscores our commitment to improving the ecological and aesthetic quality of the site.</p> <p>Furthermore, while none of the existing trees on-site are protected, our approach ensures that the development will not only maintain but significantly enhance the green character of the area. The introduction of these higher-quality trees, coupled with the other ecological measures, will result in a net gain for the site's biodiversity and help to reinforce the suburban character that is valued by the community.</p>
	The submitted arboricultural impact assessment has identified that the remaining trees would be retained to the rear of the site and protection measures that would be put into place during any phase of construction.	No response necessary nor design enhancement required.
	In the event of planning permission being granted the LPA would seek the replacement of the trees lost to the front of site to compensate for the harm caused by the removal of the existing trees to the suburban character of the area.	In response to the concern regarding the replacement of trees lost at the front of the site, we would like to clarify that there are currently no trees located at the front of the property. However, to address the concerns raised by the Planning Officer and further enhance the aesthetic value of the development, the revised plans now include the planting of a new tree at the front of the property. This addition will contribute positively to the visual appeal of the site and reinforce the suburban character of the area, ensuring that the development integrates seamlessly with its surroundings.
	These details, along with the tree protection plan would have been secured by a suitably worded compliance condition to ensure compliance with Local Plan Policy DM28.	No response necessary nor design enhancement required.
<b>G. ECOLOGY</b>		
	Local Plan Policy DM27 seeks to enhance biodiversity across the borough and that development proposals should have no adverse have no adverse impact on species of animal or plant or their habitat protected under British or European law, highlighted within a local/regional Biodiversity Action Plan, or when the Council is presented with evidence that a protected species would be affected.	<p>In response to the concerns outlined here regarding the enhancement of biodiversity and the protection of species and habitats, we would like to direct the Planning Officer's attention to the comprehensive BNG calculations provided for the proposed development. The report titled BNG-001-02 - Biodiversity Net Gain Assessment, along with the statutory calculations included, highlights the substantial ecological benefits that this development will bring.</p> <p>Specifically, the development achieves an impressive net gain of 34.41% for habitat units and 14.16% for hedgerow units. These figures are significantly higher than the 10% net gain target mandated by the new regulations, demonstrating our commitment to not only meeting but exceeding the required standards for biodiversity enhancement. The considerable biodiversity improvements outlined in this assessment underscore the positive impact of the development on local ecology, ensuring that the proposal aligns with both the letter and spirit of Policy DM27.</p>

Case Officer Report Number	Case Officer Commentary	Polaris Passivhaus Response + Design Enhancements
	A Preliminary Ecology Assessment has been submitted in support of the application which identified that there is a low potential for bat roosting within the existing building and within the existing trees across the site. No other protected species were identified on site which raised concerns with officers.	No response necessary nor design enhancement required.
	Following advice received from the LPA's specialist ecology advisor, it is concluded that sufficient evidence has been submitted in order for the LPA to discharge its compliance with their statutory duties under Section 40 of the Natural Environment and Rural Communities Act 2006 which is required prior to the determination of the application. The council's specialist ecology advisor recommended that due to the potential for bat roosting within the existing trees on site, a condition requiring the submission of a Construction Environmental Management Plan was secured.	No response necessary nor design enhancement required.
	On the basis of the above assessment, the proposals would comply with Local Plan Policy DM27 as it has been demonstrated the development proposals would have no adverse impact on species or habitats that are protected under British law.	No response necessary nor design enhancement required.
<b>H. FIRE</b>		
	London Plan Policy D12 required that development proposals should achieve the highest standards of fire safety at the earliest possible stage: 'In the interest of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of safety'	No response necessary nor design enhancement required.
	A Fire Statement has been submitted to the council for consideration and it is considered that this satisfactorily meets the requirements set out within London Plan Policy D12 ensuring that the development would offer the highest levels of safety in the event of a fire.	No response necessary nor design enhancement required.
<b>I. FLOOD RISK</b>		
	Policy SI 12 and Policy SI 13 of the London Plan 2021 seeks that development proposals must comply with the flood risk assessment and management requirements NPPF and use sustainable urban drainage systems (SUDS). The London Plan 2021 seeks that current	No response necessary nor design enhancement required.

Case Officer Report Number	Case Officer Commentary	Polaris Passivhaus Response + Design Enhancements
	and expected flood risk from all sources should be managed in a sustainable way and that surface water management issues should be identified, and measures implemented to aim to reduce these risks. Policies SP6.4 and DM25 seek to reduce the risk of flooding in the borough and ensure that all developments incorporate sustainable urban drainage systems (SUDS). The site does not fall within an area that is at risk of flooding and a flood risk assessment has been submitted which confirms this position.	
	Furthermore, an indicative drainage strategy and layout plan has been submitted with the application which indicates that surface water would be directed to a soakaway to the rear of the property that would allow surface water to drain away naturally. Furthermore, a rainwater harvesting tank is proposed to collect run off water so that this can be reused for the maintenance of the rear communal garden.	No response necessary nor design enhancement required.
	To ensure that surface water runoff from the site would be minimal, in the event of planning permission being granted, a condition would have been recommended to ensure that a full drainage and SUDS strategy was submitted to the council for consideration.	Noted and agreeable.
	It is considered that the development proposals and the supporting drainage information submitted in support of the application, the site would be capable of delivering a drainage strategy that would be compliant with Local Plan Policy DM25.	No response necessary nor design enhancement required.
<b>J. SUSTAINABILITY</b>		
	Local Plan Policy SP6.3 seeks the council will promote high standards of sustainable design and construction form new dwellings. Reference within the Local Plan is made to the 19% Co2 reduction that was set by Part L of the building regulations that was set in 2013. Part L has since been updated and requires developments to deliver a 35% reduction beyond the building regulation requirement.	No response necessary nor design enhancement required.
	The Council would therefore seek new homes to meet the needs of residents over a lifetime and be constructed using sustainable measures to reduce carbon emissions. In line with the London Plan, the	No response necessary nor design enhancement required.

---

Case Officer Report Number	Case Officer Commentary	Polaris Passivhaus Response + Design Enhancements
	development proposals should make the fullest contribution to minimising carbon dioxide emissions.	
	The applicant's energy statement identifies low carbon methods of construction and use of renewable technologies through the implementation of Passivhaus methods and details of the final measures would be secured through condition.	Noted and agreeable.
	SP6.3 also seeks that new-building residential development meets a minimum water efficiency standard of 110 litres/person/day as set out in Building Regulations Part G.	No response necessary nor design enhancement required.
	In the event of planning permission being granted a condition would have been recommended requiring that the development would incorporate water saving and measures that comply with Part G 2 of the Building Regulations, so as to reduce water consumption to a maximum of 105 litres of water per person per day.	Noted and agreeable.



**POLARIS**  
PASSIVHAUS CONSULT • CONSTRUCT

Carbon positive form 

Biophilic designed 

Passivhaus certified 

We are creators of beautiful sustainable  
places that truly enhance our environment 