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PLANNING STATEMENT

Change of use from A1(retail) to part D2 (gym) and part C3 (6 flats) single storey infill extension and minor external alterations including the enlargement of existing windows and creation of new windows with associated amenity space, parking and refuse store (Re-submission of application ref: 20/01236)

Nos. 2-10 Fairview Road,
Norbury, London

Square Portfolio Estate Company

June 2020

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1 INTRODUCTION

- 1.1 This Statement has been prepared to support a planning application for the following development:

'Change of use from A1(retail) to part D2 (gym) and part C3 (6 flats) single storey infill extension and minor external alterations including the enlargement of existing windows and creation of new windows with associated parking and refuse store'

- 1.2 The application site is no.'s 2-10 Fairview Road, Norbury, London, SW16 5PY
- 1.3 The application is submitted on behalf of the owners, Square Portfolio Estate Company who are registered in Manchester and backed by private investment. Prior to this, the site was part of a portfolio held by The Co-operative Group who still occupy part of the site.
- 1.4 This application follows the refusal of a similar scheme (ref: 20/01236) which included 8 flats. This previous scheme was refused for a single reason associated only with the proposed residential accommodation as follows:

'The proposed development would not provide a satisfactory mix or quality of accommodation to meet the needs of future occupants and the wider community, contrary to Policy 3.5 of the London Plan, Policies SP2.7 and DM10.4 of the 2018 Croydon Local Plan, and the Council's 2019 Supplementary Planning Document titled "Suburban Residential Design".'

- 1.5 The scheme subject of this current application has reduced the number of flats to 6 and includes a number of other changes to the previous scheme to address the concerns raised.
- 1.6 The purpose of this statement is to draw together the planning policy context and set out how the appropriate considerations are addressed by the planning application, specifically the Statement considers the reason for refusal of the previous application and provides detail of how the revised proposals respond to the previous concerns and now comply fully with the relevant policies.
- 1.7 The application is supported by the following plans and documents all of which have been revised following the refusal of the previous scheme, as advised in discussions with the Planning Department during preparation of the application:

Document	Author
Scheme Plans	Howard and Seddon Architects
Design & Access Statement	Howard and Seddon Architects
Planning Statement	EdgePlan
Noise Assessment	Clarke Saunders Acoustics
Transport Statement	WSP
Energy & Sustainability Report	Hurstwood

2 SITE LOCATION

- 2.1 The application site is located on Fairview Road, off London Road and is occupied in part by the existing Co-op store situated at ground floor with storage and staff facilities at first floor.



- 2.2 To the rear of the retail unit are four maisonette-style flats accessed via a shared stairwell, with three garages at ground floor level. A service yard is accessed from the rear of the site and provides access to a loading bay serving the retail unit.



- 2.3 The site occupies a secondary location on Fairview Road, set back from the main London Road frontage. The existing mixed-use building, although of relatively recent construction is not of any significant architectural merit. With the exception of the small amount of retail frontage the building has no active frontages at street level with the only windows located on the south facing elevation being at a high level.
- 2.4 The site is located c.200m south of Norbury Station which, together with bus routes on London Road, contributes to a relatively high Public Transport Accessibility Level (PTAL) of 4. Norbury Station serves trains operated by Southern Railway on routes from Sutton, Croydon, Epsom and Caterham into London Victoria and London Bridge mainline stations.
- 2.5 Norbury District Shopping Centre extends from beyond the station to the north, and as far south as Northborough Road. The centre contains a good range of shops (including a large number of independents), banks, cafés/takeaways, betting shops, salons etc. almost entirely fronting onto the main London Road. Some additional businesses are located on side-roads just off the main street, although beyond this, they are almost all predominantly residential.
- 2.6 The existing building on the site dates from the early 1980s, when it replaced a row of terraced houses with gardens. The retail space formerly occupied by Sainsbury's is currently used by Co-op as a convenience food store with a ground floor retail sales area of around 800sqm and storage/staff facilities at first floor level.
- 2.7 On the southern side of Fairview Road are terraced houses and flats, some with small front gardens but no off-street parking. Between them is an access leading to servicing areas for shops fronting onto London Road, and on the corner of Fairview Road is a café with flats above.
- 2.8 Fairview Road is a one-way street from its junction with Roche Road to the north, past the application site, and egressing onto London Road. It meets Scott Close, which is a residential cul-de-sac at its south-western corner. The northern leg also contains terraced properties (and two detached houses) with small front gardens and no parking, although some of those to the east of the street have a rear access, shared with properties fronting London Road.
- 2.9 Immediately to the east of the site, fronting onto London Road at nos. 1485-1489 is a terrace of three shops with residential flats above. These shops are currently being renovated and amalgamated and will be occupied by the Co-op store once work is completed leaving the application site vacant.
- 2.10 The application site is not situated in a Conservation Area and the only statutory listed building nearby is the three-storey Barclays Bank premises at the junction of London Road and Norbury Crescent, approx. 50m to the north of Fairview Road. To the north and south of the listed bank building on the east side of London Road are two terraces of elaborate four-storey red-brick buildings, albeit with unsympathetic shopfronts at ground floor level.

3 PROPOSED DEVELOPMENT

- 3.1 The application proposes the change of use of no.2-10 Fairview Road from its existing retail use (Class A1) to part use as gym and fitness centre (Use Class D2) and part use as 3 self-contained flats.
- 3.2 A further 3 self-contained flats are proposed through the conversion of the existing garages at the west end of the building and a proposed 2 storey infill extension within the area that previously served as a loading bay.
- 3.3 Other alterations include enlarging existing windows and inserting new windows at ground and first floor levels in the south and west facing elevations. The existing shop front and signage is proposed to be replaced with that of The Gym Group
- 3.4 The 4 existing flats located at first and second floors are proposed to be retained and refurbished as part of the proposals.

Gym and Fitness Centre

- 3.5 The proposed gym and fitness centre will occupy 15,177sq. ft of the ground and first floor of the eastern part of the wider building. The existing main entrance serving the retail store of the eastern end of Fairview Road will be retained for the gym use.
- 3.6 With the exception of the signage that will be the subject of a separate future application the proposals involve no other external alterations.
- 3.7 The proposed occupier is The Gym who aim to increase access to health and fitness activities to a wide demographic within the local community to encourage and improve health by providing a low cost and flexible gym membership option. The Gym provides a high quality but cheaper option for the health and fitness activity.
- 3.8 The operation includes a range of cardio-vascular (rowing, running, cycling) and resistance (weights) equipment. It will provide a new facility for residents and employees that will complement nearby services and facilities. Music will be limited to provide low-level background music only.

Residential

- 3.9 The proposed residential uses seek to make better use of the areas of the building not required by the gym and fitness centre. It is proposed to create 6 new apartments from within the envelope of the existing building, conversion of the existing garages and through the construction of a two-storey infill extension. 4 existing apartments will be retained and refurbished. The table below sets out the schedule of accommodation:

	D2 Use	1B/1P	1B/2P	2B/3P	2B/4P	3B/5P	TOTAL
Ground	737sq.m	1	-	1	-	1	3
First	673sq.m	1	-	2	1	1	5
Second	-	-	1	-	1	-	2
TOTAL	1410sq.m	2	1	3	2	2	10

- 3.10 All the proposed apartments meet with minimum space standards as set out in London Plan policy 3.5 (Quality and design of housing developments) as set out below:

Ground Floor

APARTMENT 1 (1b-1p) - 37.6sq.m / 404 sq.ft.

APARTMENT 2 (2b-3p) - 64.7sq.m / 696 sq.ft.

APARTMENT 3 (3b-5p) – 86.9sq.m / 935 sq.ft.

First Floor

APARTMENT 4 (REFURB) (1b-2p) - 37.6sq.m / 404 sq.ft.

APARTMENT 5 (REFURB) (2b-3p) – 64.7sq.m / 696 sq.ft.

APARTMENT 6 (3b-5p) – 89.7sq.m / 965 sq.ft.

APARTMENT 7 (2b-3p) – 63.6sq.m / 685 sq.ft.

APARTMENT 8 (2b-4p) – 70.6sq.m / 760sq.ft

Second Floor

APARTMENT 9 (REFURB) (1b-2p) - 37.6m² / 404 sq.ft.

APARTMENT 10 (REFURB) (2b-4p) - 64.8m² / 697 sq.ft.

Other Alterations

- 3.11 To facilitate the conversion of parts of the building to residential use it is necessary to enlarge existing high-level windows and insert new windows. New windows are proposed at the ground floor in the west facing elevation replacing the existing garage doors. In the south facing elevation existing windows at first floor level are made larger and a new window to match existing is proposed at both ground and first floor levels.
- 3.12 Part of the service yard currently serving the retail use is proposed to be converted to an amenity and play area to serve the proposed residential apartments. An area of 115sq.m is proposed.
- 3.13 In the rear service yard 4 disabled parking spaces are also proposed for use by future residents. Access from the service yard is also proposed to a bike store for 20 bicycles and separate refuse storage areas for the residential and gym uses.
- 3.14 A new shopfront is also proposed to serve the gym replacing the existing Co-op shopfront.

4 PLANNING POLICY

- 4.1 The development plan comprises the London Plan published in 2016 as a consolidated version with alterations since 2011; and the recently adopted Croydon Local Plan 2018, comprising the Strategic Policies and the Detailed Policies and Proposals, which was adopted on 27 February 2018.
- 4.2 The Mayor of London has also issued no issued the intend to publish draft of the New London Plan in December 2019. Given the advanced stage of preparation the New London Plan is considered to have considerable weight. The current 2016 Plan is however still the adopted Development Plan, but the New London Plan is a material consideration in planning decisions. The significance given to it is however a matter for the decision maker.

The London Plan

- 4.3 The London Plan Spatial Development Strategy for Greater London (2016) is the overall strategic plan for greater London which sets out an integrated economic, environmental, social and transport framework for the development of London over the next 20-25 years.
- 4.4 The Mayor has identified through the London Plan and accompanying SPGs the acute need for more homes to be built in London. Recent census figures reveal that London has grown by 12% since 2001, with an increase of approximately one million people above that which was projected. The population is also expected to grow by a further one million people up to 2020.
- 4.5 The Mayor also recognises in the London Plan that sport and recreation facilities are an important part of the social infrastructure of an area and provide a range of social and health benefits for communities and neighbourhoods.
- 4.6 Relevant policies from the adopted London Plan and draft New London Plan relevant to the proposals are considered to be:

Adopted London Plan

- Policy 2.15 – Town centres
- Policy 3.2 – Improving health and addressing health inequalities
- Policy 3.3 – Increasing housing supply
- Policy 3.5 – Quality and design of housing developments
- Policy 3.14 – Existing housing
- Policy 3.19 – Sport facilities
- Policy 4.7 – Retail and town centre development

Draft New London Plan

- Policy SD6 – Town centres and high street
- Policy SD7 – Town centres: development principles and development plan policies
- Policy D6 – Housing quality and standards
- Policy D14 – Noise
- Policy H1 – Increasing housing supply
- Policy H2 – Small sites

- Policy S5 – Sports and recreation facilities

Local Planning Policy

- 4.7 The Croydon Local Plan 2018 brings together the Strategic Policies (including its partial review) and the Detailed Policies and Proposals into one planning document. It supersedes the Croydon Local Plan: Strategic Policies (2013) and replaces the Saved Policies of the Unitary Development Plan (2006).
- 4.8 The Plan’s Strategic Objectives aim to fulfil the spatial vision, which includes sustainable growth in Croydon’s suburbs to accommodate homes, including affordable homes, to contribute to the borough’s housing need. Strategic Objective 3 is to provide a choice of housing for people at all stages of life. Strategic Objective 5 aims to ensure that high quality new development both integrates, respects and enhances the borough’s natural environment and built heritage.
- 4.9 Norbury forms one of 16 varied and distinctive ‘Places’ in the borough. Each Place includes a vision, map and summary of how the places will be shaped over the plan period. In Norbury, London Road forms a long linear route, and the built form of ‘Large Buildings with Continuous Frontage Line’ and ‘Medium Rise Blocks with Associated Grounds’ emphasises this linear route and its dominance on the area.
- 4.10 The site lies within the defined District Centre for Norbury although not in a Main or Secondary Retail Frontage. Policy DM4 requires development proposals within the district centres to accord with a hierarchical approach. This specifies that on sites within the Primary Shopping Area but outside a defined frontage, all uses will be acceptable in principle.
- 4.11 Policy SP4 requires new development to be of a high quality, to respect local character, and to contribute positively to public realm, landscape and townscape. The site is located in an Archaeological Priority Area and a Local Heritage Area. Policy DM18 requires that proposals enhance the setting of any heritage asset affected or have no adverse impact on the existing setting.
- 4.12 Policy DM16 promotes the creation of healthy communities which encourage healthy behaviours through the promotion of opportunities for maximising positive gains and addressing health inequalities.
- 4.13 Development Management policies relevant to these proposals include:
- Policy DM1: Housing choice for sustainable communities
 - Policy DM4 - Development in Croydon Metropolitan Centre, District and Local Centres
 - Policy DM10: Design and character
 - Policy DM16: Promoting Healthy Communities
 - Policy DM18: Heritage assets and conservation
 - Policy DM41: Norbury

National Planning Policy Framework (2019)

- 4.14 The NPPF includes a requirement on local planning authorities to plan positively for growth and states that “Strategic policies should set out an overall strategy for the pattern, scale and quality

of development, and make sufficient provision for housing (including affordable housing), employment, retail, leisure and other commercial development”.

- 4.15 Chapter 5 underlines the Government’s objective of boosting the supply of homes, encouraging land to be brought forward where it is needed, including an assessment of the size, type and tenure needed for different groups in the community. Paragraph 68 states *“Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly”*
- 4.16 Annex 2 of the NPPF establishes that leisure facilities are a main town centre use. As such this location is considered to be in centre.
- 4.17 Paragraph 85 states *“Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Planning policies should: define a network and hierarchy of town centres and promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters; define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre; retain and enhance existing markets and, where appropriate, re-introduce or create new ones; allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead.”*

National Planning Practice Guidance

- 4.18 On the 6th March 2014, a Ministerial Statement was published announcing the launch of an online database of National Planning Policy Guidance (NPPG). The NPPG was subsequently updated to reflect the publication of the revised NPPF in July 2018. Whilst this practice guidance is a material planning consideration, it is intended as guidance only and is therefore subservient to policies in the NPPF.
- 4.19 The detailed guidance within the NPPG has been taken into account within this Planning Statement.

5 PLANNING CONSIDERATIONS

- 5.1 The Planning application proposes a mixed-use scheme comprising of a gym and leisure use (D2) and residential use (C3) through the change of use, conversion and modification of the existing building.
- 5.2 It follows a previous application ref: 20/01236 that was refused due to concerns associated with the quality and mix of the proposed residential accommodation. No concerns were raised with regard to the change of use of the building from A1 to D2 and no concerns were raised with regard to the proposed operation of the D2 use.
- 5.3 In order to address the concerns raised in respect of the proposed residential accommodation the number of residential units has been decreased from 8 (plus 4 existing apartments) to 6 (plus 4 existing apartments). The reduction in the number of units has enabled the introduction of 2 x 3-bedroom units and resulted in other improvement so that now all apartments are compliant with policy. In addition, a large new amenity area is proposed of 115sq.m which provides an area for play space and shared amenity space. Further details regarding the residential quality of the apartments are set out in paragraphs xxx-xxx below.
- 5.4 The application is accompanied by a number of technical reports and assessments amended to reflect the revised proposals now subject of this application. The submitted drawings and design illustrations, seek to describe the nature and form of the development in detail, and how it will be successfully assimilated into its environment.
- 5.5 The key planning consideration in relation to the proposed development and relevant planning policy include:
- Principle of use
 - Proposed residential quality
 - Residential amenity
 - Highways and Transport
 - Other matters

Principle of Proposed Use

- 5.6 The application site is located in Norbury, within the defined district shopping centre, but on a side street off London Road which is the main thoroughfare. In this location, which is not in a Main or Secondary Retail Frontage, Local Plan Policy DM4 specifies that all uses including residential will be acceptable in principle. There is no requirement for the existing retail use to be maintained.
- 5.7 The location is highly accessible and Local Plan Policy SP2 applies a presumption in favour of development of new homes in such places provided they respect local distinctiveness and protect the borough's physical, natural and historic environment.

- 5.8 In respect of the proposed gym use Policy 4.7 of the London Plan states that leisure development should be focused in town centres or on sites on the edge of centres that are, or can be, well integrated with public transport.
- 5.9 Paragraph 86 of the National Planning Policy Framework (2019) states that “Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.”.
- 5.10 As set out within the NPPF a gym/leisure (Use Class D2) is considered to be a main town centre use. The Croydon Local Plan confirms that the site falls within Norbury District Centre and therefore within a town centre area, therefore the proposal meets the sequential test and is the preferred location for this use.
- 5.11 Development Management policy DM4 confirms within the district centre but outside the main and secondary frontages all uses will be considered acceptable subject to demonstrating that a specific end users will be occupying the ground floor units on occupation. In respect of this application in the event that planning permission is granted it is confirmed that The Gym Group will be occupying the premises.
- 5.12 It is considered that the principle of bringing forward an increase in much needed new housing together with a health and fitness centre making efficient use of the existing building and bringing health and employment benefit to the local community are all supported by planning policy as set out above.
- 5.13 The proposed leisure use will provide a new use to the district centre that is currently not catered for and will be a benefit for the surround community by introducing a leisure facility, open 24 hours a day and providing new employment opportunities. The proposals will help increase the vitality and choice in this district centre.
- 5.14 The proposed residential uses which will also deliver improvements to the appearance of the building will enhance the building and complement the existing residential character on Fariview Road away from London Road. Increasing the number of dwellings on the site and making the best and most efficient use of the site contributing to the delivery of new housing are all positive aspects of the proposed development.

Design and Appearance

- 5.15 The accompanying Design and Access Statement, prepared by Howard and Seddon Architects along with the scheme plans, addresses the design aspects of the proposed development in detail.
- 5.16 The proposal involves relatively little change to the existing building with only relatively minor but positive changes proposed to the fenestration of the building and a small infill extension.
- 5.17 The changes to the fenestration are all considered to be positive alterations to the premises. The existing building is of poor architectural merit and has a low level of fenestration that creates a rather austere building. It is proposed to enlarge a number of the windows which are

currently just high level so that are sufficient to serve the residential dwellings. This improves the appearance and increases levels of natural surveillance.

- 5.18 In addition to enlarging windows a number of new windows are proposed, most notably the existing garage doors on the west facing elevation are proposed to be replaced with windows creating a much more attractive and active elevations to this part of the building. Overall the changes to the building's fenestration are considered to be positive alterations improving the relationship of the building with the street.
- 5.19 The proposals also include the replacement of the existing shop front. A future application will be submitted in respect of the signage required in relation to the proposed use of the building by The Gym Group.
- 5.20 A proposed extension is also proposed to the rear of the building located within an area currently forming the loading bay for the retail use. Filling in this area provides the opportunity to increase the number of dwelling on the site without causing an adverse impacts in terms of overlooking or loss of privacy. The infill extension will use materials to match the existing building and windows proportions and design will also reflect the existing situation. The location of the extension means it is not a significant feature in the street scene and in terms of all other considerations is considered to be acceptable.
- 5.21 The proposals comply with Local Plan policy DM10 (Design and character) in that they respect the development layout, the scale, height and massing and the appearance of the building and surrounding area.

Residential Quality

- 5.22 The previous application was refused due to concerns raised in respect of the residential quality of the proposed apartment specifically the officer raised concerns associated with the mix of residential units and specifically the lack of 3 bedroom units (Croydon Local Plan Policy SP2.7), undersized apartments (London Plan Policy 3.5) and lack of amenity space or play space (Croydon Local Plan Policy DM10.4).
- 5.23 Other concerns were raised in respect of poor light, outlook and privacy and concerns were raised with regard to the layout of some of the apartments and the fact that some apartments were single aspect.
- 5.24 The amended proposals have addressed the above concerns in the following ways:

Proposed Mix

- 5.25 The proposed mix (excluding the existing apartments that will be refurbished) now includes:
- 1 x 1 bed 3 x 2 bed and 2 x 3 (Proposed) and 2 x 1 bed and 2 x 2 bed existing.
 - The proposed mix is therefore 16.7% - 1 Beds, 50% 2 Beds and 33.3% 3 beds
- 5.26 Therefore, the proposed mix exceeds the target set in Croydon Local Plan policy SP2.7 of 30% of all new homes being 3 bed or more.

Proposed Floor Area

5.27 The table below details the each of the different types of unit, the proposed floor area and the policy requirement as set out in London Plan Policy 3.5 and Croydon Local Plan policy DM10.4

Unit No.	Unit Type	GIA		Amenity Space	Play Space
		Required (sq.m) - LP Policy 3.5	Proposed (sq.m)	Required (sq.m)	Required (sq.m)
1	1B/1P	37	37.6	5	0.3
2	2B/3P	61	64.7	6	1.2
3	3B/5P	86	86.9	8	4.6
4 (Existing)	1B/1P	37	37.6	5	0.3
5 (Existing)	2B/3P	61	64.7	6	1.2
6	3B/5P	86	89.7	8	4.6
7	2B/3P	61	63.6	5	1.2
8	2B/4P	70	70.6	7	1.2
9 (Existing)	1B/1P	37	37.6	5	0.3
10 (Existing)	2B/4P	70	64.8	7	1.2
			Total	62	16.1

Floor area

5.28 As can be seen from the above table all of the proposed new apartments comply with the minimum floorspace standards as required by policy. The only apartment that doesn't meet current standards is apartment 10 which is an existing dwelling that is proposed to be refurbished only.

5.29 All the proposed dwellings also conform to the minimum floor area requirements of the Technical housing standards - nationally described space standard, 2015 as well as the Mayors Housing SPG, 2016 and London Plan policy 3.5. In accordance with those standards all double bedrooms are also a minimum of 11.5sq.m and a single bedrooms are a minimum of 7.5sq.m.

Amenity area/play space

5.30 As the proposals involve the conversion of an existing building there are a number of constraints that prevent the proposed apartment from incorporating balconies or other private amenity spaces accessed directly from individual apartments.

5.31 Paragraph 6.77 of the Croydon Local Plan which provides supporting text to policies 10.4 and 10.5 confirms that private, communal and play space can be pooled for a flatted development that meets other requirements of the policy.

5.32 Policy DM10.4 confirms that 5sq.m of private amenity space for a 1-2 bedroom units with an extra 1sq.m per extra occupant thereafter. The proposed development therefore generates a pooled requirement of 62 square metres to accommodate the needs of the proposed and existing apartments.

5.33 Local Plan policy 10.4 also requires that developments of 10 or more dwellings also provide a minimum of 10sq.m of play space per child. Despite the development only proposing 6 new

apartments this policy requirement is also provided. The proposed development generates a pooled requirement of 16.1 sq.m.

- 5.34 The proposed development includes a communal amenity area and play space to the rear of the development comprising an area of 115sq.m this exceeds the pooled requirement for amenity and play space of 78.1sq.m. The proposed spaces will be designed in an adaptable way to accommodate the different needs of future occupiers.

Residential Quality

- 5.35 Various other concerns we raised in respect of the previous proposals in relation to the quality of the accommodation proposed. Although the existing building due to its construction and depth of its plan do present a number of constraints it is considered that a very high level of residential accommodation is achieved.
- 5.36 **Aspect** – of the 6 flats proposed, 3 of them are unavoidable single aspect this is primarily due to the constraints of the existing building and the depth of the original plan resulting in only windows on a single side of the relevant flat. It should however be noted no of the flats are north facing with apartments 7 and 8 both being south facing and apartment 1 being west facing. Each of these flats are also served by large windows and will therefore received good levels of natural daylight and direct sunlight.
- 5.37 All other proposed apartments benefit from dual or triple aspect and are therefore well served in term of daylight and direct sunlight.
- 5.38 **Privacy** – The ground floor apartments although not benefitting from a buffer zone due to the existing configuration and relationship with the street are proposed with relatively high sill levels to minimise direct views into the apartments from passing pedestrians. The lower part of the window could be fitted with obscure glazing to the lower part of the window to further protect the privacy of occupiers. Due to the size of the windows this would not be detrimental to the levels of light or significantly impact on outlook. All other proposed dwelling benefit from good levels of privacy and there is no overlooking of neighbouring properties or gardens.
- 5.39 Overall the proposed apartment will provide a high standard of residential amenity for future occupier and comply with the relevant guidance and standards set out in the Mayors Housing SPG and Technical Housing Standards.

Accessibility and Transportation

- 5.40 The application is accompanied by a Transport Statement which establishes the location of the site in the context of the local highway network and its accessibility in relation to other forms of travel including public transport provision.
- 5.41 Pedestrian footways on both sides of Fairview Road lead to London Road and to the residential area to the west of the site. There is a pedestrian crossing on London Road within c.20m. and the site is within walking distance of many local facilities along London Road, including convenience stores, public houses, restaurants, takeaways, banks, coffee shops, hairdressers, hardware stores, the railway station and bus stops. The site is also within a 1-hour commute by

public transport of a large part of central London as well as employment areas in Croydon, Mitcham and Balham.

- 5.42 Given the car free nature of the proposed scheme but taking account its high PTAL rating, the development is likely to generate fewer trips overall. The gym use is expected to cater for a relatively local catchment with the vast majority of trips being by walking or public transport. The development would not result in a noticeable increase in pedestrian movements when compared with the existing retail use of the site.
- 5.43 Four disabled-only car parking spaces are proposed within the development and the site access has an acceptable level of visibility onto Fairview Road. As such, the scheme will have no appreciable traffic impact on the local highway network. Level pedestrian access is available and on-site storage provision is made for 20 bicycles including scope for electric cycle charging and the storage of mobility scooters. Short-term on-street parking is available in the vicinity for visitors.
- 5.44 The Transport Statement concludes that there would be no impact on the local highway network and in accordance with Local Plan policies and the NPPF there is no highway reason for the application to be refused consent.

Noise

- 5.45 An environmental noise survey has been undertaken to establish the prevailing noise climate at the site in order to determine the suitability of the site for the proposed gym use as well as preliminary sound insulation requirements for the proposed residential properties.
- 5.46 This report describes the findings of investigations into transmission of noise and vibration from the demise and provides recommendations as to how a gym use may co-exist with the adjoining and nearby uses.
- 5.47 The report concludes that subject to recommendations the proposed gym use can manage or control the transmission of noise and vibration to ensure the 24 hours gym use can coexist with the existing residential neighbours.
- 5.48 The proposed operator of the D2 use The Gym Group has considerable experience of operating similar 24-hour health and fitness operations and currently operates from over 180 locations nationwide. Through this experience the company has well-established and tried and tested measures to ensure that there are no harmful noise impact or disturbance on surrounding occupiers. The operating management procedures will be adopted so that the proposed 24-hour gym use will not adversely impact upon the residential or other uses in the surrounding area.
- 5.49 From an assessment of visitors to other similar operations around the country and the scale and nature of the operation proposed, only 9.29% of visits are made between the hours of 23:00 and 06:00, with very minimal attendance between 00:00 and 06:00. Due to the nature of the gym use, members attending between these hours tend to do so on an individual basis, rather than as part of groups, and comprises those working shifts, such as emergency service personnel. As such, the potential for any impact in terms of noise and disturbance during these

hours is limited and the extended hours of operation of the unit would not result in additional harm to the amenity of adjoining neighbouring or surrounding properties.

- 5.50 The fit out of the gym will include the use of flooring material across the gym floor area, which provides sound insulation for equipment and reduces impact sound to ensure noise is contained within the unit. The existing building structure and proposed noise insulation measures will provide appropriate sound insulation for the areas used for cardio vascular equipment, whilst further acoustic mats are laid in the free weights areas to provide further mitigation against the potential noise resulting from dropped equipment and to restrict the transfer of noise into the building's structure. There will be no openable windows or doors, apart from the entrance which will be formed of an entrance lobby behind the main doors with security portal doors into the main gym area, which will also prevent against noise breakout.
- 5.51 In terms of the operation of the gym facility itself, audio / visual equipment is placed on antivibration mounts, with volume limiters on all equipment to restrict sound to an acceptable level. The volume limiter is kept in a secure area of the gym to ensure that this cannot be interfered with. Audio / visual equipment in the gym is limited to a small number of units which are located around the building to avoid hotspots of noise. These are kept to a minimum noise level, enabling members to utilise headphones.
- 5.52 Given the nature of the operation and the management controls and mitigation measures employed by The Gym, it is considered that the proposed change of use of the premises would not have a detrimental impact on the amenity of residents within the surrounding area. The Gym are a considerate and conscientious operator who rely on the local population for a considerable element of their membership and as such take their responsibility to the local environment and surrounding occupiers very seriously to ensure that disturbance does not occur.
- 5.53 The proposed residential units will be built with high levels of sound insulation to ensure no noise is transmitted from the proposed gym use through walls and floors into the dwellings.
- 5.54 In this way it is considered that both uses can be compatible with each other and the existing surrounding uses. The experience of the operator also helps ensure the facility is capable of being run with causing any adverse impact.

Crime and Anti-Social Behaviour

- 5.55 London Plan Policy 7.3 (Designing out crime) states in respect of decisions that "*Development should reduce the opportunities for criminal behaviour and contribute to a sense of security without being overbearing or intimidating*". The Gym successfully operate on a 24-hour basis utilising this well tested system and have an exemplary safety record across all existing operational Gyms in the UK. The established operation and management measures set out will ensure a safe environment without an unacceptable impact on local amenity.
- 5.56 Access to the property is strictly controlled. Between the hours of 8am and 8pm the front door of the premises will be open, and access will be afforded to the lobby. At this point a two-door portal will be in operation which requires a personal entry code to be entered into a keypad and restricts access to one person at a time only. The pin code enables The Gym to record

attendance within the premises. The full height glazed partitions and portals also provide a barrier to noise transmitting from the main body of the gym via the accesses.

- 5.57 Free-standing computer terminals within the entrance area of the premises enable people to join up to The Gym or to manage any issues relating to existing membership and entry. Call points are located externally to enable any users to address issues directly.
- 5.58 As noted previously, an extensive network of CCTV cameras will operate throughout the premises providing coverage of all internal areas and external entrances. This CCTV will be monitored on a 24 hour a day basis through a remote monitoring system enabling operatives to quickly identify and react to potential issues.
- 5.59 Given the operation of the unit, the control and management measures that the proposed use employs, and that the unit faces away from the nearby residential units, the daily operation of the gym will therefore not generate unacceptable amenity impact to the nearby residents.
- 5.60 Overall, the proposed nature of the operation, together with the mitigation and management measures, and the existing building specification will ensure that there are no unacceptable impacts on adjoining and surrounding occupiers or the local environment.

Energy and Sustainability

- 5.61 An Energy and Sustainability Statement prepared by Hurstwood Environmental supports this application. The report confirms that the CO₂ emissions and reductions associated with each stage of the energy hierarchy and energy demand reduction. In order to deliver an environmentally responsible building, an exemplar approach is being proposed based on low energy design principles. In summary, this approach involves energy demand minimisation through effective building form, good envelope design and proficient use of services.
- 5.62 Through fabric and building service efficiencies the building improves upon building regulations CO₂ emissions targets and with the addition of renewable energy in the form of a roof mounted 32kWp solar PV system further CO₂ savings will be secured.
- 5.63 The report considers the feasibility of incorporating low and zero carbon technologies, high efficiency systems or low carbon energy efficiency alternatives in the proposed development has been undertaken. This also addresses energy efficiency measures which could be implemented to make energy and CO₂ reductions.
- 5.64 Various technologies are detailed, including benefits, costs and savings, and the report establishes a baseline total energy demand for the proposed development in accordance with the government's Standard Assessment Procedure (SAP 2012).
- 5.65 The report concludes that a 35% reduction in CO₂ emissions can be achieved through the successful application of the lean, clean, green energy hierarchy approach incorporating the use of a PV solar system and high efficiency boilers.

Heritage Matters

- 5.66 The application site is not located in a Conservation Area or particularly close to Listed Buildings, however the London Road frontage (specifically excluding the application site) is designated as a Local Heritage Area (LHA). As an area identified only by the Local Planning Authority the LHA is defined as a non-designated Heritage Asset by the NPPF.
- 5.67 As the proposals relate only to the change of use of the building with minor beneficial changes to the buildings fenestration and a small infill extension to the rear of the building it is not considered that there will be any adverse impact at all on the non-designated heritage asset. The refurbishment and amalgamation of numbers 1485-1489 London Road which will bring these long vacant unit back into use is considered to have a very beneficial impact on the Local Heritage Area. These works formed Phase 1 of the development being brought forward by the applicant, this application forming Phase 2.

Archaeology

- 5.68 The application site lies within an Archaeological Priority Area. A Desk Based Assessment and site-walk over has been undertaken which contains an examination of readily available documentary, cartographic and known archaeological evidence.
- 5.69 Records in relation to Roman, Medieval and Post-Medieval activity have been established within a 750m study area, but not in direct relation to the application site. In addition, it was found that significant past impact has taken place within the site boundary caused by the construction of the early 20th Century houses. Despite the location of the site in proximity to a known Roman road the potential archaeological resource is considered to be 'Low'. The impact of the proposed development on the Cultural Heritage Resource is anticipated to be 'Not Significant'. On this basis, it is considered that no further archaeological work will be required.
- 5.70 Notwithstanding the above save for the proposed infill extension to the rear of the building the proposals involve minimal disturbance of the existing ground and would have no impact on the site's archaeology.

Air Quality

- 5.71 The London Borough of Croydon has declared the whole of the borough as an Air Quality Management Area (AQMA) and the site is located close to London Road which has been identified as a NO₂ Air Quality Focus Area. An Air Quality Assessment has been provided to assess the potential effect of the Development on local air quality during construction, and to determine the potential air quality concentration that residents will experience.
- 5.72 The proposed development involves relatively minor construction works with the existing building being retained in its entirety. Minor works to create new and enlarged window openings are proposed and a small infill extension. This minor works with appropriate management are not considered to result in any significantly demonstrable air quality impacts.
- 5.73 It is anticipated that the implementation of mitigation measures proposed would avoid significant dust effects and will ensure that impacts to sensitive receptors are minimised or removed.

5.74 The proposed uses including expansion of the existing residential uses on the site are considered to be acceptable. The site is therefore considered suitable for the development type proposed and no additional mitigation of exposure for new receptors introduced by the proposed development is required.

6 CONCLUSIONS

- 6.1 This Planning Statement has been prepared in support of an application for the change of use of the existing building from A1 (retail) to part D2 (gym) and part C3 (6 residential apartments). Other works including a small infill extension and alterations to the building fenestration are also proposed. The application is also supported by a range of reports and assessments dealing with various matters.
- 6.2 The application follows a similar previously refused proposal where officers had raised concerns in respect of the residential mix and quality. These previous issues have been robustly addressed the revised proposals have been reduced by 2no. units so that only 6 are now proposed. The mix of units now includes 2, 3 bed units and all the apartments are served by a generous dedicated area of amenity and play space. Overall, the residential accommodation now proposed makes better use of the existing building and provides 6 new apartment including 2 family sized units to help meet a need identified in the local area. In this respect the previous concerns raised have been fully addressed.
- 6.3 The existing building comprises an under-utilised mixed retail/residential building (the retail part of which is soon to become vacant) in an accessible location situated in a district shopping centre, close to a Local Heritage Area and within an Archaeological Priority Area. It is directly adjoined on all sides by a mixture of unlisted buildings of varying age.
- 6.4 The proposed change of use is acceptable in principle as confirmed by Local Plan policy DM4. The proposed D2 use will improve the district centres vitality and viability through providing a new and extremely popular use within the centre that is not currently catered for, attracting new users to the centre and encouraging additional footfall and linked trips to other services and facilities.
- 6.5 Local planning policies also encourage the provision of new homes in accessible locations where local distinctiveness is encouraged and the borough's physical, natural and historic environment is protected. The proposals will help to meet the significant demand for new housing in London. The proposed dwelling meet and exceed the minimum spaces standards and will provide high quality new homes for the local market.
- 6.6 The site is located close to a Local Heritage Area; however, it is not considered that there will be any direct harm or loss of historic significance or potential archaeological resource caused by the new building.
- 6.7 Accessibility and Transportation are addressed in a Transport Statement. It is concluded that impact on the local highway network will not be severe and that four disabled car parking spaces will be sufficient for the development, along with provision for secure cycle parking.
- 6.8 The Planning Statement has demonstrated that the previous concerns raised in respect of the residential accommodation has been robustly addressed and are now acceptable complying fully with the relevant policy. The Statement also confirms as with the previously submitted proposals that the gym can operate from this site without causing harm to the amenity enjoyed by existing or future residents. The mitigation measures incorporated into the building and the building fit out specification, together the operational and management controls, will ensure

that there are no unacceptable impacts in terms of noise on adjoining and surrounding occupiers or the local environment. Providing a high level of security throughout the operation is a principle objective of The Gym. Maintaining a friendly and welcoming environment and deterring any anti-social behaviour is a priority to both The Gym and to its members.

- 6.9 The proposed development will facilitate a number of clear benefit supported by policy including new local employment, a viable alternative use for a soon to be vacant large retail unit, provision of greater choice in the district centre and encouraging footfall and linked trips to the area, improved access to a fitness centre and the consequential improvements to health and wellbeing and increasing housing supply in the area to help address housing need in the area.
- 6.10 Taking account of all of these matters, together with the presumption in favour of sustainable development in National Planning Policy, it is evident that planning permission should be granted in accordance with the provision of the development plan. We therefore respectfully request that the council grant planning permission for the proposed development.