

# London Borough of Croydon LLFA Statutory Response to LPA

## Major Development

### Application Details:

<b>Application Number:</b> 22/04130/FUL	<b>Date Received from LPA:</b> 03/05/2023
<b>Site Name:</b> 34A, 34B And Rear Of 34 Arkwright Road, South Croydon, CR2 0LL	<b>Date of response:</b> 17/05/2023
	<b>Planning Status:</b> Full
<b>Description:</b> Demolition of existing dwellinghouses at 34a and 34b Arkwright Road and the construction of 9 dwelling houses 3-4 storeys in height together with associated parking, access and landscaping.	

### LBC LLFA Summary and Recommendations:

The submitted FRA and overall approach meet most of the LLFA requirements and generally present an acceptable approach to controlling surface water runoff and mitigating flood risk. However, some clarifications and additional information are also required to fully demonstrate compliance.

**Recommendation:** *Holding Objection subject to submission of further details.*

### Summary of Site Issues and Scheme Proposals:

The total site area is 0.3 hectares (3000m<sup>2</sup>).

The EA's indicative floodplain map shows that the site is in Flood Zone 1

The report does not confirm that the site is within a Critical Drainage Area, more clarification needed.

The FRA report has reviewed the Environment Agency's Groundwater Source Protection Zones (SPZs), which show that the site is located in Zone I – Inner Protection Zone and Zone II- outer protection Zone, consultation with the Environmental Agency is required.

### Relevant Planning Policy:

The following planning policies and considerations are relevant to the LLFA review of the application:

- Croydon Local Plan (adopted 27th February 2018) Strategic Policy SP6.4,
- Croydon Local Plan (adopted 27th February 2018) Detailed Policy DM25.3
- London Plan 2016, policy 5.12 and 5.13

The LLFA requirements are outlined in:

- Croydon LLFA Advice to Planning Applicants (online)

### Review of Proposed Drainage Strategy:

The following documents were submitted and have been reviewed:

- Surface Water Drainage Technical Note, produced by MB Mayer Brown, dated 4<sup>th</sup> October 2022.
- Site Location Plan, drawing No PL 20-540- 01-Rev B, prepared by Addo Design Ltd, dated September 2022.
- Proposed Site Layout Plan, drawing No PL 22-640-03-Rev E, prepared by Addo Design Ltd, dated 20<sup>th</sup> January 2023.

- Proposed Block Plan - Ground Floor Layout, drawing No PL 22-640-04-Rev E, prepared by Addo Design Ltd, dated 20<sup>th</sup> January 2023.
- Topo Survey, drawing No 020818-102-02, prepared by Mark Newman Associates, dated 2<sup>nd</sup> August 2018.
- Thames Water sewer records.
- British Geological Survey Infiltration SuDS Report, Report ID GR\_220402/1.
- Proposed Surface Water Drainage Strategy Drawing No. MA-ARKWRIGHTRD.10/10-P1, Revision P4, produced by MB Mayer Brown, and dated 29<sup>th</sup> September 2022.
- Geolight Tank Brochure, prepared by SDS Water Infrastructure Systems.
- Proposed Infiltration Tank MicroDrainage Calculations, produced by MB Mayer Brown, and dated 29<sup>th</sup> January 2021.

The Drainage Strategy report sets out a strategy for managing runoff from the various parts of the site through infiltration as follows:

- The proposed drainage strategy is based on full infiltration, therefore no discharge from site is proposed post-development. An assumed infiltration rate of  $1 \times 10^{-5}$  m/s is used in the design.
- It is proposed to discharge the surface water via infiltration through two soakaway tanks (Geolight by SDS Ltd, or similar approved) – one in the access road and one in the rear garden of the south-eastern most property, details of which are as follows:

**Soakaway Tank 01** Located underneath access road.

Plan Area of  $64\text{m}^2 \times 2.0\text{m}$  deep  $\times$  95% void ratio

Volume=  $121.6\text{m}^3$

**Soakaway Tank 02** Located under rear garden.

Plan Area of  $12\text{m}^2 \times 1\text{m}$  deep  $\times$  95% void ratio

Volume=  $11.4\text{m}^3$

- The parking court at the end of the access road will be drained via permeable paving approx. area  $534\text{m}^2$  with usable volume of  $48\text{m}^3$ , which will discharge via a proprietary fin drain collection system into soakaway tank 01.
- Increasing the rate of infiltration following in situ testing and reducing the Factor of Safety should also allow approximately  $48\text{m}^3$  of attenuation to be used in the permeable paving by installing a hydro-brake on SW10.

The proposals have been reviewed against the relevant policies and specifically the Full Planning Permission Checklist in the LLFA Advice to Planning Applicants. Comments are provided in the table below which reproduces the checklist criteria:

Criteria	Comments	Compliant?
a) Detailed existing site layout at an identified scale;	<b>Provided</b> - Site layout is provided at an identified scale.	<b>Yes</b>
b) Topographical survey of the site, with contours, with a demonstrated understanding of how surface water would flow across the site;	<b>Provided</b> – Site survey plan with site elevations is provided, along with a description in the report of the existing topography.	<b>Yes</b>
c) Calculations of the following with the demonstration that they meet the requirements of the NPPF and Planning Practice Guidance, London Plan Policy (2016), its supporting document; Sustainable Design and Construction Supplementary Planning Guidance (2014) and the SuDS Non-Statutory Technical Standards (2015);	<b>Partially Provided:</b> - The site is a brownfield site, but the total existing impermeable area is not provided. Developer to confirm total existing impermeable area.	<b>Partially</b>

i. change in impermeable areas between the current site and proposed site;	<p>The proposed site is divided into hard and soft landscaping as follows: -</p> <p>Total Impermeable Area (Buildings, roads, carparking, pavements) =0.153ha</p> <p>Total soft Landscaping =0.147ha</p>	
ii. greenfield runoff rate (Qbar);	<p><b>Not Provided: -</b></p> <p>Greenfield Run-off Calculations (using IH124 methodology) should be provided.</p> <p><b>Qbar = Not Provided</b></p>	No
iii. existing runoff rates during 1 in 1 year, 1 in 30 year, 1 in 100-year storm events and discharge rates during 1 in 1 year, 1 in 30 year, 1 in 100 year, 1 in 100 year + Climate change storm events;	<p><b>N/A: -</b></p> <p>Existing brown field runoff rates not provided, but justification provided as whole site is thought to drain via soakaways.</p> <p>Proposed discharge rates also not provided, but justification provided as proposed site will drain via soakaways.</p>	Yes
iv. water storage capacity of the proposed drainage features to retain the 1 in 100 years + Climate Change storm events.	<p><b>Partially Provided: -</b></p> <p>The drainage plan indicates the use of 2 soakaway tanks (Geolight by SDS Ltd, or similar approved), details as follows:</p> <p>Soakaway Tank 01:  Total Drained Impermeable Area = 1,390m<sup>2</sup>  CL (min)= 100.00m AOD  IL = 96.15m AOD  Soffit = 98.15m AOD  Cover above tank = 1.85m  Plan Area= 64m<sup>2</sup>  Volume = 64m<sup>2</sup> x 2.0m x 95% voids = 121.6m<sup>3</sup></p> <p>Soakaway Tank 02:  Total Drained Impermeable Area = 140m<sup>2</sup>  CL (min)= 97.50m AOD  IL = 95.60m AOD  Soffit = 96.60m AOD  Cover above tank= 0.9m  Plan Area = 12m<sup>2</sup> (stated as 16m<sup>2</sup> on drawing, but dims are 3m x 4m and calcs show 12m<sup>2</sup>)  Volume = 12m<sup>2</sup> x 1.0m x 95% voids = 11.4m<sup>3</sup></p> <p>Also, it is proposed to use Permeable Paving for the proposed site. The drawing shows an Approximate Area of 534m<sup>2</sup>,</p>	Partially

	<p>usable Depth of stone for attenuation = 300mm 30% void ratio Volume= 48m<sup>3</sup></p> <p>A Hydrobrake is also proposed for the site with a Peak discharge of 1l/s from the permeable paving into Soakaway 01.</p> <p>Source Control calculations have been provided for both of the soakaway tanks with results for storm events up to and including the 1:100yr + 40% climate change events. These calculations match with the drained areas, dimensions, and volumes of SUDS features stated on the drawing and generally demonstrate the volumes proposed are sufficient. However, there is a warning on the calcs for Soakaway 01 that indicates that the half drain time is much longer than the storm durations modelled, and that therefore the critical storm may not have been identified.</p> <p>Amended calculations for Soakaway 01 should be provided with longer storm durations modelled to verify the storage volume is still sufficient at longer duration events. The developer may wish to include the additional infiltration capacity and storage volume of the permeable paving.</p> <p>No calculations have been provided relating to the permeable paving, although this area has been included in the calculations for Soakaway 01, into which the permeable paving is understood to drain.</p>	
v. Consideration of long-term storage requirements for sites greater than 1 hectare, with volumes specified for the 1 in 100-year 6-hour storm event for the greenfield, existing and post developed site. Robust evidence must be provided to support proposals where long term storage is deemed inappropriate.	<p><b>N/A</b></p> <p>The site is less than 1 ha.</p>	<b>Yes</b>
d) Demonstration that the proposals aim to meet and better greenfield runoff rates in line with London Plan Policy 5.13 and Croydon Council Local Plan policy DM 25.3. Where greenfield runoff rates cannot be achieved, detailed justification as to why will be required.	<p><b>Provided: -</b></p> <p>Full infiltration strategy has been proposed.</p>	<b>Yes</b>



<p>e) Demonstration that the proposed form of drainage has regard to the drainage hierarchy in the London Plan Policy 5.13 and industry best practice. Robust evidence must be provided to support proposals where SuDS are deemed inappropriate, e.g. if infiltration is deemed not viable.</p>	<p><b>Partially Provided: -</b></p> <p>The flood risk assessment has reviewed the drainage hierarchy from Building Regs Part H in Section 1.23 and provides justification of why infiltration SuDS are appropriate.</p> <p>However, the London Plan drainage hierarchy considers that the storage of rainwater for later re-use is more preferable. The developer should consider the potential use of water butts, and either confirm their inclusion in the scheme (and show proposed locations on the drainage layout drawing) or provide justification of why these cannot be incorporated.</p>	<p><b>Partially</b></p>
<p>f) A statement on the benefits the proposed drainage strategy brings in terms of water quality, environmental and social benefits.</p>	<p><b>Partially Provided: -</b></p> <p>Soakaway tanks and permeable paving techniques will be employed within the site to deal with the excess run-off from the post developed site.</p> <p>The FRA report has mentioned the water quality benefits offered but hasn't considered environmental and social benefits.</p>	<p><b>Partially</b></p>
<p>g) Layout Plan (to scale) of the proposed drainage scheme in line with the requirements of a Drainage Strategy Layout Plan as stated in section 8.2 of the Croydon's LLFA requirements for sustainable drainage proposals supporting Full Planning Permission;</p>	<p><b>Provided: -</b></p> <p>A preliminary drainage layout at identified scale is provided, in line with the requirements of a Drainage Strategy Layout Plan as stated in the LLFA's Advice to Applicants, providing the following:</p> <ul style="list-style-type: none"> <li>• Cover and Invert levels for all structures.</li> <li>• Proposed pipe network details confirming connectivity of different SuDS elements, including pipe diameters, gradients and invert levels.</li> <li>• Size and storage volumes of all proposed SuDS features described in the report, to tie in with volumes stated in the report &amp; calculations.</li> <li>• Details of permeable paving in terms of construction type, attenuation volume, porosity and connection(s) to the piped network.</li> </ul>	<p><b>Yes</b></p>

<p>h) Consideration of how exceedance flows for events greater than the 1 in 100 year + Climate Change event will be managed and mitigated on site without significantly increasing flood risks (both on site and outside the development). This should be supported by a site plan demonstrating the post developed site (with site levels shown) and indicative flow paths for exceedance flows.</p>	<p><b>Provided: -</b></p> <p>The flood risk assessment report and drainage drawing provide the indicative flow paths for exceedance flows. The report also describes how the flow paths indicated mimic the existing scenario where exceedance surface water flows at the site currently drain overland to either the southeast corner and to the ground via infiltration as the site is underlain by chalk, or on to Arkwright Road.</p>	<p><b>Yes</b></p>
<p>i) Where infiltration SuDS are proposed; i. they should be supported by infiltration testing in accordance with BRE365. Where infiltration testing is not possible at the full planning stage, a desktop study should be undertaken to consider the potential for infiltration SuDS at the site as well as an alternative drainage strategy proposed in the event infiltration is determined not to be viable through infiltration testing.</p>	<p><b>Not Provided -</b> No infiltration testing has been undertaken for the site. The report does refer to infiltration testing undertaken at a nearby site in Coulsdon, with a comparable subgrade, which gave an infiltration rate of <math>2.5 \times 10^{-4}</math> m/s (0.9m per hour). Therefore, the assumed rate used in the calculations of <math>1 \times 10^{-5}</math> m/s (0.36m per hour) is considered to represent a worst-case scenario.</p> <p>Whilst the infiltration rate referred to from a nearby site is useful, it is not clear how close to the application site this "nearby" site is, and it cannot be relied upon due to the inherent variability in infiltration rates in chalk subgrades. The applicant needs to provide in situ infiltration testing in accordance with BRE365.</p> <p>The LLFA's Advice to Applicants states that where infiltration testing is not possible at the full planning stage, a desktop study should be undertaken to consider the potential for infiltration SuDS at the site as well as an alternative drainage strategy be proposed in the event infiltration is determined not to be viable through infiltration testing. Whilst the report contains a sufficient desktop study demonstrating that infiltration is likely to be viable, an alternative drainage strategy still needs to be proposed if infiltration testing cannot be carried out at this stage.</p>	<p><b>No</b></p>

ii. if the site lies within groundwater Source Protection Zones 1 or 2 (as defined by the Environment Agency), the risk of contaminating groundwater and control measures required to mitigate this should be considered, in accordance with Croydon Local Plan Strategic policy 6.4(d). We expect developers to provide evidence that they have consulted with the Environment Agency regarding the drainage proposals.	<b>Not Provided</b> - The FRA report's appendices includes an extract of the Environment Agency's Groundwater Source Protection Zones (SPZs) mapping; the site is located in Zone I – Inner Protection and Zone II- outer Protection Zone.  Discharge to ground will need to be approved by the Environment Agency during the planning consultation process. No consultation evidence has been provided.	<b>No</b>
j) Details of any offsite works required, together with necessary consents (where relevant) – we expect developers to have consulted with Thames Water and/or the Environment Agency depending on the method of surface water discharge and provide evidence of agreed points of connection and discharge rates.	<b>N/A</b> – The surface water run-off from the post developed site will be managed using infiltration SuDS, therefore no discharge of surface water from the site is proposed requiring any offsite works.	<b>Yes</b>
k) A site-specific maintenance and ownership Plan for proposed SuDS – including details of the management and maintenance for all SuDS and how they will be secured for the lifetime of the development.	<b>Partially Provided: -</b>  Whilst Section 1.45 of the report states that the drainage will all remain private, no site-specific management and maintenance details are provided for either the soakaway tanks or the permeable paving.  The developer must provide further details of required maintenance activities and frequencies for the whole of the proposed drainage system including all SuDS features.	<b>Partially</b>

## Conclusions of Review and Further Requirements:

The table provides a list of the compliant criteria and areas of non-compliance.

To address the inadequacies of the current proposals the following action is required for each of the listed criteria:

**c) i)** Developer to confirm total existing impermeable area.

**ii)** Developer to provide greenfield runoff rate (Qbar) for the total site area of 3000m<sup>2</sup> or 0.3 ha.

**iv)** Amended calculations for Soakaway 01 should be provided with longer storm durations modelled to verify the storage volume is still sufficient at longer duration events. The developer may wish to include the additional infiltration capacity and storage volume of the permeable paving.

**e)** The developer should consider the potential use of water butts, and either confirm their inclusion in the scheme (and show proposed locations on the drainage layout drawing) or provide justification of why these cannot be incorporated.

**f)** Applicant to demonstrate consideration of environmental and social benefits of proposed SUDS strategy.

**i) i)** Applicant to provide in situ infiltration testing in accordance with BRE365. Where infiltration testing is not possible at the full planning stage, an alternative drainage strategy must be proposed in the event infiltration is determined not to be viable through infiltration testing.

- ii) Provide evidence of EA consultation and approval for the proposed infiltration drainage strategy.
- k) The developer must provide further details of required maintenance activities and frequencies for the whole of the proposed drainage system including all SuDS features.

## Planning Response

We **object** to this planning application in the absence of an acceptable Drainage Strategy relating to:

- Insufficient information provided to determine if the site drainage meets the requirements of the NPPF and PPG, SuDS Non-Statutory Technical Standards (NSTS) (March, 2015), the London Plan (2016) policy 5.13, it's supporting document; Sustainable Design and Construction Planning guidance (2014), Croydon's Local Plan 2018 Strategic Policy 6.4, Detailed Policy DM25.3 and Croydon's LLFA requirements for sustainable drainage proposals supporting full planning permission.

**Reason:** Further information required which are highlighted in the points above in the Conclusions of Review and Further Requirements.

We will consider reviewing this objection if the additional information and clarifications outlined above are adequately addressed in accordance with the LLFA's expectations.

**Recommendation:** *Holding Objection subject to submission of further details.*

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**London Borough of Croydon  
Planning Application – Highways Response**

**Planning Application Ref:** 22/04130/FUL

**Address:** 34A, 34B And Rear Of 34 Arkwright Road, South Croydon, CR2 0LL

**Description:** Demolition of existing dwellinghouses at 34a and 34b Arkwright Road and the construction of 9 dwellinghouses 3-4 storeys in height together with associated parking, access and landscaping

**Planning Officer:** Hoa Vong

**Date of Receipt:** 31/10/2022

**Date of Comments:** 11/11/2022

**Comments**

This application is for the demolition of 2 existing dwellings at the rear of 34 Arkwright Road and erection of 5 new blocks containing 9 dwellings and provision of 13 off street parking spaces.

The details supporting the access and parking arrangements are considered unacceptable. There are no swept path details showing vehicles accessing and egressing the access road demonstrating accessibility and safety. The proposal to narrow the central island on Arkwright Road to enable vehicles to turn right from the access road onto Arkwright Road is considered unacceptable and unsafe. Narrowing the Island could also encourage vehicles to turn right into the site from Arkwright Road which is also considered unacceptable.

It is the opinion of highways that the island should be extended, and signage used to prevent vehicles turning right and only enable vehicles to turn left and follow the one way working of the highway layout.

Details of how the island is designed needs to be agreed between the developer and highways before highways can agree to this application. Until this agreement has been reached highways will consider this application to be unacceptable.

Once agreed highways will require the developer to enter into a section 278 highways agreement to secure the design and implementation of the necessary highway works.

The proposals to widen the vehicular crossover to the access road which will impact on utility covers and services. Consultation with utilities must be undertaken to ensure the proposals accommodate these services.

Arkwright Road is not a classified road.

**Highways Boundary**

This application is contained within the existing site footprint so has no impact on the Highway Boundary.

**Highways Works**

### Enabling works

This application does not include a construction logistics plan on how safe access to the site for construction traffic will be achieved so a condition will be required for a detailed CLP to be submitted for approval.

Following approval of the Construction Logistics Plan the developer is advised to contact the Highways team to procure the necessary highway works to implement a strengthened vehicular crossover to provide construction access. The existing vehicular crossover is not suitable for construction traffic.

To ensure access to the development is provided using a vehicular crossing constructed to a suitable standard to withstand construction traffic and that utility services are not damaged the developer will need to contact the London Borough of Croydon to arrange suitable enabling works arrangements.

All costs incurred by London Borough of Croydon undertaking the works will be met by the developer in advance.

A condition will need to be added to any planning consent issued requiring the developer prior to commencement on site to issue to Highways a photographic highways condition survey. This survey will be used to assess damage caused to the public highway resulting from construction activity. Remedial works resulting from construction damage will be funded by the developer.

Failure to submit the condition survey could result in all highway defects adjacent to the site being attributed to the site activities.

### Permanent Works

The access and parking arrangements as submitted is considered unacceptable on safety grounds. There are no swept paths showing how vehicles can access and egress the access road. The proposals to narrow the central island on Arkwright Road to enable vehicles to right turn out of the site is considered unacceptable and unsafe.

Once agreement on the access arrangements has been reached highways will require the developer to enter into a section 278 highways agreement to secure the necessary highway works at least 6 months prior to completion of development to secure the design and implementation of highway modifications to include the following.

Where works are to be undertaken to the public highway, these highway works including highway remedial works must be carried out by the Local Authority and funded by the developer, following a technical design review.

The terms of the s278 highways agreement will include the following:

1. To redesign the central island on Arkwright road to reflect agreed principles.
2. To redesign the access vehicular crossover to reflect agreed access requirements.
3. To design acceptable signage to reflect agreed access movements.
4. To resurface the footway to extents of the site.
5. To undertake relevant utility works to accommodate the new highway layout.
6. To refresh carriageway markings.
7. To remedy any damage to the highway resulting from the construction works.
8. To meet London Borough of Croydon costs for approving all designs submissions and utility company confirmation of the works.
9. To meet London Borough of Croydon costs for implementing all highway and drainage works.

### **Legal**

The proposed access and parking arrangements are considered unacceptable due to the lack of information demonstrating acceptability and safety.

Highways would like the following conditions added to any planning consent.

Prior to commencement of development to submit for approval a comprehensive and detailed construction logistics plan.

Prior to commencement on site the developer is to submit to Highways a photographic highway condition survey covering the site and near vicinity so that on completion of the development an assessment of damage caused by construction activity can be made and remedial works undertaken.

All remedial works attributed to the site will be remedied at the developers cost. Failure to submit the condition survey could result in all highway defects adjacent to the site being attributed to the site activities.

Prior to commencement on site to contact Highways for the implementation of a temporary heavy duty vehicular crossover to provide access for construction purposes.

At least 6 months prior to completion of development to enter into a s278 highways agreement to design and implement agreed and necessary highway works..

An application form is available online at:

<https://www.croydon.gov.uk/transportandstreets/rhps/section278>

For further information, please contact Highways Development on 0208 255 2816 or via email at [highwaysdevelopment@croydon.gov.uk](mailto:highwaysdevelopment@croydon.gov.uk). Please be advised the approval process will take a minimum of 12 weeks to complete."

Development Management  
Sustainable Communities, Regeneration and Economic  
Recovery Department, 6th Floor  
Bernard Weatherill House  
8 Mint Walk  
Croydon CR0 1EA

Please ask for/reply to: Rob Goode  
Tel/Typetalk:  
Minicom: 020 8760 5797  
Email: TreeOBS@croydon.gov.uk

Your ref: P/PC/South Area Team/DCHV  
Our ref:  
Date: 12th December 2022

## **Tree Team Section - Observations on Planning Application 22/04130/FUL**

Dear Hoa Vong

**Application Number:** 22/04130/FUL

**Location:** 34A, 34B And Rear Of 34 Arkwright Road, South Croydon, CR2 0LL, ,

**Description:** Demolition of existing dwellinghouses at 34a and 34b Arkwright Road and the construction of 9 dwellinghouses 3-4 storeys in height together with associated parking, access and landscaping

In response to your notification my comments and recommendation on the above application are:

Recommendation:

No arb objection, please condition the tree survey and protection plan

Created in Uniform Date: 12.12.2022

Yours sincerely

Rob Goode  
for Deputy Head of Development Management

The comments made can be viewed in Notes within Consultations and this letter has been saved into the Document Management System.

## **Contact details for Tree Team Section**

Phone: 020 8726 6800

Email: TreeOBS@croydon.gov.uk

Mail: Development Management Service  
6th Floor, Zone A/B  
Bernard Weatherill House  
8 Mint Walk, Croydon CR0 1EA





27<sup>th</sup> February 2023

Hoa Vong  
Croydon Council

By email only

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*Thank you for requesting advice on this application from Place Services' ecological advice service. This service provides advice to planning officers to inform Croydon Council planning decisions with regard to potential ecological impacts from development. Any additional information, queries or comments on this advice that the applicant or other interested parties may have, must be directed to the Planning Officer who will seek further advice from us where appropriate and necessary.*

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**Application:** 22/04130/FUL  
**Location:** 34A, 34B And Rear Of 34 Arkwright Road South Croydon CR2 0LL  
**Proposal:** Demolition of existing dwellinghouses at 34a and 34b Arkwright Road and the construction of 9 dwellinghouses 3 storeys in height together with associated parking, access and landscaping

Dear Hoa,

Thank you for re- consulting Place Services on the above application.

**No objection subject to securing biodiversity mitigation and enhancement measures**

**Summary**

We have reviewed the Updated Ecological Impact Assessment letter report (Darwin Ecology, August 2022), Preliminary Ecological Appraisal and Preliminary Bat Roost Assessment (Arbeco, July 2019), Badger report (Greenspace Ecological Solutions, 2021), the Biodiversity Net Gain Assessment by (aLyne Ecology 2021), Landscape Planting Plan with Biodiversity Enhancements (HWandCo, 2021 DWG Ref: 0400/21/B/1B) and other associated plans and documents, relating to the likely impacts of development on designated sites, protected & Priority species and habitats and identification of proportionate mitigation.

We are satisfied from the Updated Ecological Impact Assessment letter report that updated surveys and mitigation is not required for other protected or Priority species for this site. We therefore satisfied that there is sufficient ecological information available for determination of this application.

The mitigation measures identified in the Preliminary Ecological Appraisal and Preliminary Bat Roost Assessment (Arbeco, July 2019), Badger report (Greenspace Ecological Solutions, 2021), the Biodiversity Net Gain Assessment (aLyne Ecology, 2021) and Landscape Planting Plan with Biodiversity Enhancements (HWandCo, 2021 DWG Ref: 0400/21/B/1B) should be secured by a condition of any consent and implemented in full. This is necessary to conserve and enhance protected and Priority species.



We noted no fences are included on the proposal, which will enable connectivity for hedgehog and badger post-development. If any amendments are needed (i.e. installation of fences) this information is required to be submitted to the LPA in the first instance.

We also support the proposed reasonable biodiversity enhancements, which have been recommended to secure measurable net gains for biodiversity, as outlined under Paragraph 174d of the National Planning Policy Framework (2021). The reasonable biodiversity enhancement measures should be outlined within a Biodiversity Enhancement Strategy and should be secured by a condition of any consent.

This will enable LPA to demonstrate its compliance with its statutory duties including its biodiversity duty under s40 NERC Act 2006.

Impacts will be minimised such that the proposal is acceptable, subject to the conditions below based on BS42020:2013.

We recommend that submission for approval and implementation of the details below should be a condition of any planning consent.

#### **Recommended conditions**

##### **1. ACTION REQUIRED IN ACCORDANCE WITH ECOLOGICAL APPRAISAL RECOMMENDATIONS**

*"All mitigation and enhancement measures and/or works shall be carried out in accordance with the details contained in the Preliminary Ecological Appraisal and Preliminary Bat Roost Assessment (Arbeco, July 2019), Badger report (Greenspace Ecological Solutions, 2021), the Biodiversity Net Gain Assessment (aLyne Ecology, 2021) and Landscape Planting Plan with Biodiversity Enhancements (HWandCo, 2021 DWG Ref: 0400/21/B/1B) as already submitted with the planning application and agreed in principle with the local planning authority prior to determination.*

*This may include the appointment of an appropriately competent person e.g. an ecological clerk of works (ECoW) to provide on-site ecological expertise during construction. The appointed person shall undertake all activities, and works shall be carried out, in accordance with the approved details."*

**Reason:** To conserve and enhance protected and Priority species and allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species).

##### **2. PRIOR TO ANY WORKS ABOVE SLAB LEVEL: BIODIVERSITY ENHANCEMENT STRATEGY**

*"A Biodiversity Enhancement Strategy for protected and Priority species shall be submitted to and approved in writing by the local planning authority.*

*The content of the Biodiversity Enhancement Strategy shall include the following:*

- a) Purpose and conservation objectives for the proposed enhancement measures;*
- b) detailed designs to achieve stated objectives;*
- c) locations of proposed enhancement measures by appropriate maps and plans;*
- d) persons responsible for implementing the enhancement measures;*
- e) details of initial aftercare and long-term maintenance (where relevant).*

*The works shall be implemented in accordance with the approved details prior to occupation and shall be retained in that manner thereafter."*



**Reason:** To enhance protected and Priority species & habitats and allow the LPA to discharge its duties under the s40 of the NERC Act 2006 (Priority habitats & species).

**3. PRIOR TO OCCUPATION: WILDLIFE SENSITIVE LIGHTING DESIGN SCHEME**


*"A lighting design scheme for biodiversity shall be submitted to and approved in writing by the local planning authority. The scheme shall identify those features on site that are particularly sensitive for bats and that are likely to cause disturbance along important routes used for foraging; and show how and where external lighting will be installed (through the provision of appropriate lighting contour plans, and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent bats using their territory.*

*All external lighting shall be installed in accordance with the specifications and locations set out in the scheme and maintained thereafter in accordance with the scheme. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority."*

**Reason:** To allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species)

Please contact us with any queries.

Yours sincerely

  
A Qualifying member of CIEEM  
Assistant Ecological Consultant  
Place Services at Essex County Council  
[placeservicesecology@essex.gov.uk](mailto:placeservicesecology@essex.gov.uk)

**Place Services provide ecological advice on behalf of Croydon Council**

Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.

[REDACTED]

---

**From:** Development Management  
**Sent:** 01 November 2022 09:20  
**To:** Vong, Hoa; [REDACTED]  
**Subject:** FW: Notification for Observations on application number 22/04130/FUL  
**Attachments:** 1a. External Consultation Checklist v3.3\_Aug 17.pdf

-----Original Message-----

From: KSLPlanning [mailto:KSLPLANNING@environment-agency.gov.uk]  
Sent: 31 October 2022 16:52  
To: Development Management <Development.Management@croydon.gov.uk>;  
Vong, Hoa <Hoa.Vong@croydon.gov.uk>  
Subject: RE: Notification for Observations on application number 22/04130/FUL

Thank you for your consultation, this is a misconultation and falls outside our remit. Please be advised that we will only respond to consultations that meet one or more of the criteria on our External Consultation Checklist. We recommend you use the tick list to demonstrate why the Environment Agency needs to be consulted for future planning consultations.

If you would like a meeting to discuss when to consult the Environment Agency please email [kslplanning@environment-agency.gov.uk](mailto:kslplanning@environment-agency.gov.uk).

Kind Regards,

[REDACTED]  
Planning Specialist - South London

Sustainable Places | Environment Agency | Kent & South London [REDACTED]  
[REDACTED] | [REDACTED] [KSLPlanning@environment-agency.gov.uk](mailto:KSLPlanning@environment-agency.gov.uk)  
Environment Agency, 3rd Floor, Seacole Building, 2 Marsham Street, London,  
SW1P 4DF

-----Original Message-----

From: [development.management@croydon.gov.uk](mailto:development.management@croydon.gov.uk)  
<[development.management@croydon.gov.uk](mailto:development.management@croydon.gov.uk)>



Sent: 31 October 2022 14:45

To: KSLPlanning <KSLPLANNING@environment-agency.gov.uk>

Subject: Notification for Observations on application number 22/04130/FUL

Please see attached observations request for 34A, 34B And Rear Of 34  
Arkwright Road South Croydon  
CR2 0LL

You can use the link below to view the case details. If the link doesn't work for you then copy the URL into a web browser to view the case details:

<https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fpublicaccess3.croydon.gov.uk%2Fonline-applications%2FapplicationDetails.do%3FactiveTab%3Dsummary%26keyVal%3DRJAK9OJL0BK00&data=05%7C01%7CKSLPlanning%40environment-agency.gov.uk%7C1320e95330f64ede08b508dabb4e87ed%7C770a245002274c6290c74e38537f1102%7C0%7C0%7C638028243356445076%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6IklhYWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=6fc7JlgdToq8FQ%2Bc1szelxpda1AHyXIWDTcUdVRCf2k%3D&reserved=0>

Council services, online, 24/7

<https://eur03.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.croydon.gov.uk%2Fmyaccount&data=05%7C01%7CKSLPlanning%40environment-agency.gov.uk%7C1320e95330f64ede08b508dabb4e87ed%7C770a245002274c6290c74e38537f1102%7C0%7C0%7C638028243356445076%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6IklhYWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=ScHkbXTgKXJGfNDzECdNrIlyRO6%2BizWIrCVft2m5g3o%3D&reserved=0>

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<https://eur03.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.croydon.gov.uk%2Femail-disclaimer&data=05%7C01%7CKSLPlanning%40environment-agency.gov.uk%7C1320e95330f64ede08b508dabb4e87ed%7C770a245002274c6290c74e38537f1102%7C0%7C0%7C638028243356445076%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6IklhYWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=XYnje94Bmt22iaXgqPg3x9sKaNDcKouEVHDnfOKAPG4%3D&reserved=0>

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[REDACTED]

---

**From:** Development Management  
**Sent:** 24 November 2022 12:07  
**To:** [REDACTED]  
**Cc:** Vong, Hoa  
**Subject:** FW: Notification for Observations on application number 22/04130/FUL. 34A, 34B  
And Rear Of 34 Arkwright Road, South Croydon, CR2 0LL

Regards

[REDACTED]

Deputy Team Leader

Planning Technical Support Team  
Planning and Sustainable Regeneration Department  
6<sup>th</sup> Floor, Zone B  
Bernard Weatherill House  
8 Mint Walk  
Croydon  
CRO 1EA

Or DX 136016 Croydon 17 - Planning

Tel: 0208 726 6000 [REDACTED]

Please note my normal working days are Monday, Tuesday, Thursday and Friday



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---

**From:** Vong, Hoa <Hoa.Vong@croydon.gov.uk>

**Sent:** 24 November 2022 12:06

**To:** Development Management <Development.Management@croydon.gov.uk>

**Subject:** FW: Notification for Observations on application number 22/04130/FUL. 34A, 34B And Rear Of 34 Arkwright Road, South Croydon, CR2 0LL

Hi Team,

Can these be uploaded and logged please. Highways comments. Thanks.

Kind Regards,

Hoa Vong  
Principal Planning Officer

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Development Management (South Team)  
Planning and Sustainable Regeneration  
Sustainable Communities, Regeneration and Economic Recovery  
6<sup>th</sup> Floor, Zone B  
Bernard Weatherill House  
8 Mint Walk  
Croydon, CR0 1EA

---

**From:** [REDACTED]

**Sent:** 15 November 2022 14:10

**To:** Vong, Hoa <[Hoa.Vong@croydon.gov.uk](mailto:Hoa.Vong@croydon.gov.uk)>

**Subject:** RE: Notification for Observations on application number 22/04130/FUL. 34A, 34B And Rear Of 34 Arkwright Road, South Croydon, CR2 0LL

Noted thanks.

I can confirm that the details of delivery and servicing which are outlined in the Highways Technical Note are satisfactory.

Regards

[REDACTED]  
**Pollution Control Officer**  
**Pollution Team**  
**Sustainable Communities, Regeneration & Economic Recovery.**

**CROYDON**  
www.croydon.gov.uk

Tel: 0208 726 6000 [REDACTED] / Email [REDACTED]@croydon.gov.uk/ Website: [www.croydon.gov.uk](http://www.croydon.gov.uk)



---

**From:** Vong, Hoa <[Hoa.Vong@croydon.gov.uk](mailto:Hoa.Vong@croydon.gov.uk)>

**Sent:** 15 November 2022 13:52

**To:** [REDACTED] <[\[REDACTED\]@croydon.gov.uk](mailto:[REDACTED]@croydon.gov.uk)>

**Subject:** RE: Notification for Observations on application number 22/04130/FUL. 34A, 34B And Rear Of 34 Arkwright Road, South Croydon, CR2 0LL

Hi [REDACTED]

Thanks for these. The delivery and servicing details are in the highways and technical note, (attached).

Kind Regards,

Hoa Vong  
Principal Planning Officer

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Development Management (South Team)  
Planning and Sustainable Regeneration  
Sustainable Communities, Regeneration and Economic Recovery  
6<sup>th</sup> Floor, Zone B  
Bernard Weatherill House  
8 Mint Walk  
Croydon, CR0 1EA

---

**From:** [REDACTED]

**Sent:** 15 November 2022 12:44

**To:** Vong, Hoa <[Hoa.Vong@croydon.gov.uk](mailto:Hoa.Vong@croydon.gov.uk)>

**Subject:** RE: Notification for Observations on application number 22/04130/FUL. 34A, 34B And Rear Of 34 Arkwright Road, South Croydon, CR2 0LL

Dear Hoa,  
Comments in relation to the above application for Demolition of existing dwellinghouses at 34a and 34b Arkwright Road and the construction of 9 dwellinghouses

**Pollution and Noise from Demolition and Construction Sites**

The applicant should observe the Council's Code of Practice entitled '**Control of Pollution and Noise from Demolition and Construction Sites**' which is available from the following link: <https://lovecleanair.org/wp-content/uploads/2014/11/Code-of-practice-August-2015.pdf>.

As well as the Mayor of London's Best Practice Guidance '**The Control of Dust and Emissions during Construction and Demolition SPG**' which is available from the following link:

<https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance-and-spgs/control-dust-and>

**Construction Logistics Plan**

The applicant must submit a Construction Logistics Plan to improve the safety and reliability of deliveries to a site, reduce congestion and minimise the environmental impact. Further details may be obtained from the following links:

<http://lovecleanair.org/wp-content/uploads/2014/11/A-practical-guide-to-drafting-a-construction-logistics-plan-CLP-August-2015.pdf>

<http://lovecleanair.org/wp-content/uploads/2014/11/Construction-logistics-handbook-August-2015.pdf>

**Contaminated Land Risk Assessment**

The applicant needs to conduct a phase 1 desk study and submit a report before commencement.

#### **Noise standard for living rooms and bedrooms**

In this type of development, this department normally expects the 'good' standard for acoustic design criteria under the British Standards Institute BS8233:2014 "*Guidance on sound insulation and noise reduction for buildings*" in living rooms and bedrooms as described in the table below.

#### **Indoor ambient noise levels for dwellings**

Activity	Location	07:00 to 23:00	23:00 to 07:00
Resting	Living room/area	35dB LAeq, 16 hour	-
Sleeping (daytime resting)	Bedroom	35dB LAeq, 16 hour	30dB LAeq, 8 hour

In bedrooms at night, individual noise events should not normally exceed 45 dB LA MAX.

#### **Air handling units/Plant/Machinery**

The noise level from any air handling units, mechanical plant, or other fixed external machinery should not increase the background noise level when measured at the nearest sensitive residential premises. In effect, this means the noise level from any new units should be at least 10dB below existing background noise levels.

#### **Light pollution**

In accordance with guidance from the Institution of Lighting Professionals, light from the proposed illuminations should not cause a nuisance to local residents.

The applicant should comply with the document *Guidance Notes for the Reduction of Obtrusive Light GN01:2011* and its relevant publications and standards, available at the following link:

<https://www.theilp.org.uk/documents/obtrusive-light/>

#### **Requirement for ultra-low NO<sub>x</sub> boiler**

The applicant must specify which type and model of hot water boilers will be installed before commencement of the development. The applicant must ensure that any hot water boilers achieve or improve upon Class 6 of the Energy related Products Directive. For gas and LPG boilers this requires maximum NO<sub>x</sub> emissions of 56 mg/kWh.

#### **Delivery and Servicing Plan**

The applicant must submit a Delivery and Servicing Plan so that delivery and servicing activities can be conducted in a safe and efficient manner whilst minimising impacts on the local environment. The applicant should follow the Transport for London guidelines for this, available at <https://content.tfl.gov.uk/delivery-and-servicing-plan-guidance.pdf>

I have saved my comments on Uniform.

[REDACTED]  
Pollution Control Officer  
Pollution Team  
Sustainable Communities, Regeneration & Economic Recovery.

Tel: 0208 726 6000 - [REDACTED] / Email: [REDACTED]@croydon.gov.uk/ Website: [www.croydon.gov.uk](http://www.croydon.gov.uk)

-----Original Message-----

From: Development Management <[Development.Management@croydon.gov.uk](mailto:Development.Management@croydon.gov.uk)>

Sent: 31 October 2022 14:46

To: Specialist Pollution <[SpecialistPollution@croydon.gov.uk](mailto:SpecialistPollution@croydon.gov.uk)>

Subject: Notification for Observations on application number 22/04130/FUL

Please see attached observations request for 34A, 34B And Rear Of 34 Arkwright Road South Croydon  
CR2 0LL

You can use the link below to view the case details. If the link doesnt work for you then copy th e URL into a web  
browser to view the case details: [https://publicaccess3.croydon.gov.uk/online-  
applications/applicationDetails.do?activeTab=summary&keyVal=RJAK9OJL0BK00](https://publicaccess3.croydon.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=RJAK9OJL0BK00)

**From:** Development Management  
**Sent:** 15 November 2022 14:10  
**To:** [REDACTED]  
**Subject:** FW: Notification for Observations on application number 22/04130/FUL. 34A, 34B And Rear Of 34 Arkwright Road, South Croydon, CR2 0LL

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

---

**From:** Vong, Hoa  
**Sent:** 15 November 2022 13:25  
**To:** Development Management <Development.Management@croydon.gov.uk>  
**Subject:** FW: Notification for Observations on application number 22/04130/FUL. 34A, 34B And Rear Of 34 Arkwright Road, South Croydon, CR2 0LL

Hi Team,

Can this be logged and uploaded please. Env pollution comments.

Kind Regards,

Hoa Vong  
Principal Planning Officer

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Development Management (South Team)  
Planning and Sustainable Regeneration  
Sustainable Communities, Regeneration and Economic Recovery  
6<sup>th</sup> Floor, Zone B  
Bernard Weatherill House  
8 Mint Walk  
Croydon, CR0 1EA

---

**From:** [REDACTED]  
**Sent:** 15 November 2022 12:44  
**To:** Vong, Hoa <[Hoa.Vong@croydon.gov.uk](mailto:Hoa.Vong@croydon.gov.uk)>  
**Subject:** RE: Notification for Observations on application number 22/04130/FUL. 34A, 34B And Rear Of 34 Arkwright Road, South Croydon, CR2 0LL

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Transport for London guidelines for this, available at <https://content.tfl.gov.uk/delivery-and-servicing-plan-guidance.pdf>

I have saved my comments on Uniform.

██████████  
Pollution Control Officer  
Pollution Team  
Sustainable Communities, Regeneration & Economic Recovery.

Tel: 0208 726 6000 - ██████████ / Email ██████████@croydon.gov.uk/ Website: [www.croydon.gov.uk](http://www.croydon.gov.uk)

-----Original Message-----

From: Development Management <[Development.Management@croydon.gov.uk](mailto:Development.Management@croydon.gov.uk)>

Sent: 31 October 2022 14:46

To: Specialist Pollution <[SpecialistPollution@croydon.gov.uk](mailto:SpecialistPollution@croydon.gov.uk)>

Subject: Notification for Observations on application number 22/04130/FUL

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applications/applicationDetails.do?activeTab=summary&keyVal=RJAK9OJL0BK00](https://publicaccess3.croydon.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=RJAK9OJL0BK00)

Vong, Hoa

From: Toffi, Mary

Sent: 28 November 2022 15:25

To: Vong, Hoa

Cc: Evans, Nathan

Subject: RE: Highways Comments

Hi Hoa,

Comments on this proposal below. The highway changes were previously approved and do not change with this

application and there are fewer cars with the houses than the flats previously proposed.

Fundamental issues:

1. The number of parking spaces shown are acceptable however, they must be unallocated as per London Plan

and visitor parking spaces are not required specifically on site.

2. I have concerns with the number of swept path manoeuvres that some of the parking spaces require and

the length of some of the reverse manoeuvres from spaces to be able to enter and exit in forward gear. The

spaces should be easily accessed and exited via 2 point turns, maximum 3 point turns. Multiple manoeuvres

and long reverses should not be part of swept paths for parking spaces in a new development.

3. The proposed cycle storage is not acceptable as shown. The houses must have access to wide/adapted bike

parking spaces as well as normal parking spaces in purpose built cycle stores that meet LCDS standards and

allow residents to walk into the store to secure their cycles. Cycle stores in gardens must be accessed via

1.2m width footpaths and gates, not through houses and not via steps as wider/adapted bikes cannot navigate these. House 1 does not have a 1.2m wide side footpath and houses 5&6 have steps to the

back garden.

4. Visitor cycle parking is required on site.

5. The enclosures for the refuse/recycling as proposed are not acceptable as they do not open right to the

edges of the enclosure to allow bin lids to lift without moving the bins from the enclosure. They must allow

for 2x 240ltr and 1x180ltr bins and a 23ltr food caddy in each store.

6. The collection areas must be large enough to allow for a 180ltr, 240ltr bin and 1 or 2 food caddies for each

house where these are shared, for the busiest collection day. Some areas are too small and/or are within

the manoeuvring areas of vehicles and/or in front of parking spaces so will not be acceptable.

7. As the refuse vehicle is shown reversing into the turning head, the front of the vehicle will be closest to the

houses, therefore the collection areas must be within 20m walking/drag distance of the rear of the vehicle.

Refuse vehicles will reverse only 12m on site so the location of the parked refuse vehicle (9.22m in length)

should be clearly shown with the distances to the collection points.

8. A 10sq.m bulky goods area is also required on site.

9. Blue badge spaces if required on site should be shown clearly and will require the 1.2m transfer area on

three sides of the bay. If more than one blue badge bay is proposed/required they should be shown next to

each other as per BS:8300.



10. How the turning head will be kept clear of parked vehicles will need to be demonstrated  
11. They propose 15% active EVCP's on site. The requirement is 20% active and 80% passive.

Essential comments:

1. S106 to secure £1500/unit towards improvements to sustainable transport including but not limited to on

street car clubs with EVCP's as well as EVCP's in general as per policies in the Local Plan.

SP8.12 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.

SP8.13 New development will be required to contribute to the provision of electric vehicle charging infrastructure, car clubs and car sharing schemes.

The funding will go towards traffic orders at around £2500, signing, lining of car club bay, EVCP provision

including electrics and getting the car club to come to this location so set up costs for the car club.

General

expansion of the EVCP network in the area of the application. Funding will also be used for extension and

2

improvements to walking and cycling routes in the area. Membership of the car club if this application is

approved, must be secured for 3 years

2. Condition on CLP required on any permission granted.

3. S278 will be required for all changes to the public highway proposed by this application. Should be secured

through the s106

4. Boundary treatment and landscaping conditions required on any permission granted.

5. Parking spaces next to walls, structures and landscaping must be 3m wide so doors can open sufficiently for

passengers to alight comfortably on hard standing

Fundamental issues must be addressed prior to any permission granted. I cannot recommend approval at this time.

Refusal would be recommended on DM 29 & 30 highway safety due to internal layouts of parking requiring

excessive number of and long reverses manoeuvres for vehicles to be able to enter and leave in forward gear. The

blue badge bays proposed have not been shown on plan to meet the requirements of BS:8300. It has not been

demonstrated that the parking spaces will be unallocated as per London Plan requirements and how the turning

area will be managed to prevent vehicles parking there and affecting servicing vehicles turning within the site. The

cycle parking is not to LCDS standards and cannot be accessed via wide footpaths or via a level area and not steps.

Refusal also on DM 13 refuse/recycling as the enclosures for the bins are not acceptable and the collections area are

too small and/or affect parking spaces or manoeuvring areas. It has not been demonstrated that the collection areas

are within 20m of the rear of the refuse vehicle. No bulky goods area is shown on site.

Regards

Mary Toffi (she/her)

Principal Transport Planner

Strategic Transport

Planning & Sustainable Regeneration

Sustainable Communities, Regeneration & Economic Recovery Directorate

6th Floor, Zone B

Bernard Weatherill House  
8 Mint Walk  
Croydon  
CR0 1EA  
0208 726 6000

DISCLOSED UNDER EIR

## Vong, Hoa

---

**From:** Steel, Taylor  
**Sent:** 16 November 2022 08:11  
**To:** Vong, Hoa; Jogani, Anisha  
**Subject:** RE: Notification for Observations on application number 22/04130/FUL

Hi Hoa,

Anisha cc'ing you in for info regarding answers to your previous question - Tom was previously involved. Let me know if you want me to take this on, I can have a catch-up with him for background as well if that's helpful.

Best,  
Taylor

-----Original Message-----

From: Vong, Hoa <Hoa.Vong@croydon.gov.uk>  
Sent: 11 November 2022 09:39  
To: Steel, Taylor <Taylor.Steel@croydon.gov.uk>  
Subject: RE: Notification for Observations on application number 22/04130/FUL

Hi Taylor,

The appeal was dismissed. Decision below. Committee overturn. For this one, the Inspector wrote to us additionally explaining that he was elevating impact on neighbouring amenity, overlooking and unit mix to main matters on the basis of the neighbour objections that were raised during the appeal process. There was only one related to design, We sent an appeal statement addendum explaining that those matters weighed against the proposal and should form part of the planning balance, but that the committee hadn't introduced them as refusal reasons.

<https://acp.planninginspectorate.gov.uk/ViewCase.aspx?caseid=3299357>

Tom Selby provided comments before

Kind Regards,

Hoa Vong  
Principal Planning Officer

Development Management (South Team)  
Planning and Sustainable Regeneration  
Sustainable Communities, Regeneration and Economic Recovery 6th Floor, Zone B Bernard Weatherill House  
8 Mint Walk  
Croydon, CR0 1EA

-----Original Message-----

From: Jogani, Anisha  
Sent: 10 November 2022 15:50  
To: Steel, Taylor <Taylor.Steel@croydon.gov.uk>

Cc: Vong, Hoa <Hoa.Vong@croydon.gov.uk>; SPATIALOBS <SPATIALOBS@croydon.gov.uk>; Martin, Hannah <Hannah.Martin@croydon.gov.uk>

Subject: FW: Notification for Observations on application number 22/04130/FUL

Taylor,

For you.

Hoa, can you please check and clarify if there was any historical involvement from Placemaking on this one? And if so, which officer was involved?

Can you also please arrange a surgery session with Taylor to brief her on the appeal that is happening in tandem? What does that mean for the status of this application?

Best,

Anisha

-----Original Message-----

From: SPATIALOBS <SPATIALOBS@croydon.gov.uk>

Sent: 03 November 2022 16:53

To: Jogani, Anisha <Anisha.Jogani@croydon.gov.uk>

Subject: FW: Notification for Observations on application number 22/04130/FUL

Place comments

[REDACTED]

Business Support Officer – Spatial Planning

Sustainable Communities, Regeneration and Economic Recovery Department Planning and Sustainable Regeneration  
Spatial Planning Service 6th Floor, Zone B Bernard Weatherill House  
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Croydon  
CR0 1EA

Tel: 020 8726 6000 [REDACTED]

-----Original Message-----

From: Development Management <Development.Management@croydon.gov.uk>

Sent: 31 October 2022 14:45

To: SPATIALOBS <SPATIALOBS@croydon.gov.uk>

Subject: Notification for Observations on application number 22/04130/FUL

Please see attached observations request for 34A, 34B And Rear Of 34 Arkwright Road South Croydon  
CR2 0LL

You can use the link below to view the case details. If the link doesn't work for you then copy the URL into a web browser to view the case details: <https://publicaccess3.croydon.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=RJAK9OJLOBK00>



23<sup>rd</sup> February 2023

Hoa Vong  
Croydon Council

By email only

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*Thank you for requesting advice on this application from Place Services' ecological advice service. This service provides advice to planning officers to inform Croydon Council planning decisions with regard to potential ecological impacts from development. Any additional information, queries or comments on this advice that the applicant or other interested parties may have, must be directed to the Planning Officer who will seek further advice from us where appropriate and necessary.*

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**Application:** 22/04130/FUL  
**Location:** 34A, 34B And Rear Of 34 Arkwright Road South Croydon CR2 0LL  
**Proposal:** Demolition of existing dwellinghouses at 34a and 34b Arkwright Road and the construction of 9 dwellinghouses 3 storeys in height together with associated parking, access and landscaping

Dear Hoa,

Thank you for consulting Place Services on the above application.

**Holding objection due to insufficient ecological information on European Protected Species (bats)**

**Summary**

We have reviewed the Updated Ecological Impact Assessment letter report (Darwin Ecology, August 2022) and other associated plans and documents, relating to the likely impacts of development on designated sites, protected & Priority species and habitats and identification of proportionate mitigation.

We are not satisfied that there is sufficient ecological information available for determination of this application and the submitted Preliminary Bat Roost Assessment (Arbeco Ecology, Tree & Habitat Services) was undertaken in July 2019). We therefore recommend an updated preliminary bat roost assessment on the two dwellings proposed for demolition is undertaken. The results of these surveys and full details of any mitigation are then required to be submitted to the LPA for review.

We recommend an updated preliminary bat roost assessment is undertaken because, general advice on the lifespan of reports from the Chartered Institute of Ecologists and Environmental Managers (CIEEM) states that a report older than 18 months is unlikely to be valid. Bats are mobile species which could move onto the site and make use of the two dwellings and therefore the buildings need to be checked again before demolition.

We are satisfied from the Updated Ecological Impact Assessment letter report that updated surveys and mitigation is not required for other protected or Priority species for this site.



To fully assess the impacts of the proposal the LPA need ecological information for the site, particularly for bats a European Protected Species. These surveys are required prior to determination because Government Standing Advice indicates that you should *"Survey for bats if the area includes buildings or other structures that bats tend to use or there are trees with features that bats tend to use nearby"*.

The results of these surveys are required prior to determination because paragraph 99 of the ODPM Circular 06/2005 highlights that: *"It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision."*

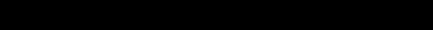
This information is therefore required to provide the LPA with certainty of impacts on legally protected species and be able to secure appropriate mitigation either by a mitigation licence from Natural England or a condition of any consent. This will enable the LPA to demonstrate compliance with its statutory duties, including its biodiversity duty under s40 NERC Act 2006 and prevent wildlife crime under s17 Crime and Disorder Act 1998.

This is needed to enable the LPA to demonstrate its compliance with its statutory duties including its biodiversity duty under s40 NERC Act 2006.

We look forward to working with the LPA and the applicant to receive the additional information required to support a lawful decision and overcome our holding objection.

Please contact me with any queries.

Yours sincerely

  
A Qualifying member of CIEEM  
Assistant Ecological Consultant  
Place Services at Essex County Council  
[placeservicesecology@essex.gov.uk](mailto:placeservicesecology@essex.gov.uk)

**Place Services provide ecological advice on behalf of Croydon Council**

Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.