

1. DETAILS OF THE DEVELOPMENT

Ref: 18/00547/FUL
Location: Selhurst Park Stadium (Whitehorse Lane), And Sainsbury's Car Park (120-122 Whitehorse Lane), No's 22, 24, 26, 28, 30 & 32 Wooderson Close, South Norwood, London, SE25 6PU.
Ward: South Norwood
Description: Extension of "Main Stand" to provide seating for an additional 8,225 spectators and an additional 24,522sqm of floor space internally (beneath the expanded "Main Stand") to be used for the operation of the football club and ancillary functions (Use Class D2), and a 550sqm GIA restaurant/retail unit (Use Class A1/A3). Demolition of 22-32 Wooderson Close, and associated refurbishment works to end elevation of 20 Wooderson Close, reorganisation of the associated parking facilities and gardens. Reorganisation of the club and supermarket car parks, and site accesses from Holmesdale Road and within the car parking area from Whitehorse Lane, with associated hard and soft landscaping. Use of the club car park as a fan plaza on match-days. Pitch lengthening (from 101m to 105m), and the creation of accessible seating within the Whitehorse Lane Stand (spectator capacity reduced by 690). Creation of replacement spectator capacity (683 additional), and relocation of the fan zone, to the corner of the "Holmesdale Road" and "Arthur Wait" stands. Reorganisation of floodlighting, including the removal of two of the flood light masts. Removal of the TV Gantry at the "Arthur Wait" Stand.
Drawing Nos: 17812 KSS MS Z0 DR A 90 001 Rev P1, MS Z0 DR A 90 002 Rev P1, MS Z0 DR A 90 003 Rev P1, EX 00 DR A 91 001 Rev P1, EX 01 DR A 91 001 Rev P1, EX 02 DR A 91 001 Rev P1, EX 03 DR A 91 001 Rev P1, HS 00 DR A 91 001 Rev P1, HS 00 DR A 91 002 Rev P1, MS ZZ DR A 92 005 Rev P1, MS ZZ DR A 92 006 Rev P1, MS ZZ DR A 93 001 Rev P1, MS ZZ DR A 93 002 Rev P1, MS ZZ DR A 93 003 Rev P1, MS ZZ DR A 93 004 Rev P1, WS 00 DR A 91 001 Rev P1, MS 00 DR A SK 002 Rev P3, MS ZZ DR A 94 001 Rev P1, MS Z0 DR A 94 001 Rev P1, MS Z0 DR A 90 004 Rev P1, MS Z0 DR A 90 005 Rev P1, MS 00 DR A 91 001 Rev P3, MS 0M DR A 91 001 Rev P2, MS 01 DR A 91 001 Rev P2, MS 02 DR A 91 001 Rev P2, MS 03 DR A 91 001 Rev P4, MS 04 DR A 91 001 Rev P3, MS 05 DR A 91 001 Rev P3, MS 06 DR A 91 001 Rev P3, HS ZZ DR A 91 001 Rev P1, MS ZZ DR A 93 005 Rev P2, MS ZZ DR A 93 006 Rev P1, MS ZZ DR A 93 007 Rev P1, MS ZZ DR A 93 008 Rev P1, MS ZZ DR A 93 009 Rev P01, MS ZZ DR A 92 001 Rev P1, MS ZZ DR A 92 002 Rev P1, MS ZZ DR A 92 003 Rev P1, MS ZZ DR A 92 004 Rev P1, MS ZZ DR A 93 010 Rev P2, MS ZZ DR A 90 025 Rev P4, MS ZZ DR A 90 024 Rev P4, MS ZZ DR A

90 020 Rev P11, MS ZZ DR A 90 021 Rev P5, MS ZZ DR A 90 022 Rev P3, MS ZZ DR A 90 023 Rev P1, MS 00 DR A SK 001 Rev P8, MS 03 DR A SK 003 Rev P6, MS 05 DR A SK 001 Rev P1.

Applicant: CFPC Ltd
Agent: Mark Gibney, Avison Young
Case Officer: Barry Valentine

- 1.1 The application is being reported to committee because:
- The development involves the erection of a building or buildings with a gross floor space of 10,000 square metres or more.
 - The Vice Chair (Cllr Ben-Hassel) made representations in accordance with the Committee Consideration Criteria and requested committee consideration
 - Due to circumstances concerning the original resolution to grant received by committee on the 19th April 2018 as set out in more detail in section 2 of this report the application is referred to the Planning Committee by the Director of Planning & Sustainable Regeneration acting in her discretion.

2. PROCEDURAL NOTE

- 2.1 Planning application reference 18/00547/FUL was originally reported to Planning Committee on the 19/04/2018, where a resolution was made to grant planning permission, subject to any direction from Mayor of London under the Stage 2 referral process, and the completion of the final draft Section 106 legal agreement (which was to be reported back to the Planning Committee).
- 2.2 On the 1st of September 2020, the Mayor of London confirmed under the Stage 2 referral process that the scheme was acceptable and recommended that planning permission be granted by the Council. The final draft of the S106 legal agreement was reported back to the Planning Committee on the 5th of November 2020 for information purposes. Planning permission was never issued as the Section 106 legal agreement was never signed by the applicant, and therefore was not completed.
- 2.3 The planning application has been returned to planning application committee to receive a new resolution. A new resolution is required due to changes in policy since the previous resolution was made, most notably (but not exclusively) the adoption of new London Plan in March 2021. The Planning Committee are requested to reconsider and redetermine the planning application (including revision thereof) in the context of current policy and guidance, and any other material planning consideration.
- 2.4 Post the Planning Committee meeting, the application will be referred back to the GLA under the Stage 2 referral process for an updated decision from the Mayor of London before the final decision is issued.
- 2.5 The application still refers to use classes as they were at the time the application was submitted. Planning applications as set out in the Town and Country

Planning (Use Classes) (Amendment) (England) Regulations 2020, which were submitted before the 1st of September 2020 that cite the previous use class order before that date, should continue to be determined using the former use class order.

3. RECOMMENDATION

3.1 That the Committee resolve to GRANT planning permission

3.2 That the Director of Planning and Sustainable Regeneration is delegated authority to issue the planning permission subject to:

- A. Any direction by the London Mayor pursuant to the Mayor of London Order
- B. The prior completion of a legal agreement to secure the following planning obligations:
 - a) Development cannot commence development (as defined) until the club have purchased the interest of social housing land, 30 Wooderson Close and associated highway and given 12 months' notice of the intention to purchase the relevant land.
 - b) Use of proceeds of sale of Social Housing Land to purchase five four-bedroomed houses to be used as affordable rent in the London Borough of Croydon as replacement for the five four-bedroomed affordable homes lost by the development.
 - c) The club to procure or construct a minimum of six replacement dwellings with at least the same floorspace as the existing dwellings, in a manner that would not result in net loss of homes or residential land. The timing for delivery of the replacement housing to be linked to key development and construction stages associated with the proposed development.
 - d) Local Employment and Training Strategy (LETS) for both construction and initial operational phases. 34% of total new jobs created to be filled by residents within the London Borough of Croydon, with some of the vacancies to be filled by vulnerable and disadvantaged residents. Up to 10 apprenticeships to be provided. The developer required to seek accreditation under the Mayor's (GLA) Good Work Standard. Opportunities to be given to local suppliers, businesses and companies within London Borough of Croydon.
 - e) Transport related obligations
 - i. Offsite highway works –off-site highway works to facilitate the development and entering into a S.278 agreement to cover all associated works. The works would include the amendment to the highway layout of car parking arrangements found in

Wooderson Close and to facilitate the amended access onto Holmesdale Road as well as changes to site access arrangement affecting the public highway. In addition, as Wooderson Close would be shortened, this part of the highway would also need to be stopped up under S.247 of Town and Country Planning Act. Works to include tree planting, planting of hedgerows and greening of Wooderson Close, with associated maintenance.

- ii. Access rights to Holmesdale Road frontage.
 - iii. Study of match day performance of road junctions and pedestrian safety at junction of South Norwood Hill/Whitehorse Lane and South Norwood Hill/High Street, proposed management measures be brought into place through trained stewards provided by the developer at those junctions.
 - iv. Match Day Coach Parking study to identify options, within the site and within 1.5km radius of the site.
 - v. Car Parking Management Plan on match and event days, including measures for pedestrian and cyclist safety, and on car parking spaces allocation.
 - vi. A Baseline Travel Plan survey to establish actual modal splits. Commitment to a Travel Plan which targets a 5% year on year reduction of single occupancy car journeys from the baseline travel plan survey for the first five years (so totalling a 25% reduction). If these yearly targets on single occupancy car journeys are not met, then deduction of up to £50,000 per year would be taken from a bond (totalling £250,000). The amount taken would be based on a formula that encourages continual improvement even if early targets are not met. Any bond received will be used on pedestrian and cycling improvement identified within a survey that is secured through the Section 106.
 - vii. Vehicle Control Measures, measures both within and beyond the site, security barriers and control measures, other counter-terrorism measures and review of Traffic Management Order.
 - viii. Car Club provision including business membership.
- f) the provision of accommodation for the Palace of Life Foundation at the site or off site within 1.5km during construction and to then provide such accommodation on site upon completion at a nominal cost and for any defined local community organisation, except on match days and large event days (attended by over 10,000).
- g) TV and Radio Surveys and Mitigation

- h) Retention of architects.
- i) Match Day and Event Day Litter Picking on key roads on key routes between stadium and surrounding stations.
- j) Temporary Street Urinal Scheme on key routes between stadium and surrounding stations.
- k) Be Seen GLA Energy clauses.
- l) The following financial obligations:

Contribution	Amount
Carbon Offset	£87,549.66
Monitoring Costs	£33,000
Travel Plan Monitoring Cost	£2,712
Local Employment and Training Strategy Construction	0.25% of capital construction costs.
Local Employment and Training Strategy Operation	£46,678
Contribution towards Regeneration Masterplan brief	£10,000
Wayfinding Strategy, Highway Signage and Public Transport Access Improvement Contribution	£30,500
Bus Stop Improvements on Whitehorse Lane	£15,770
Pedestrian Comfort Level Assessment	£30,000
Improvements to Cycle Routes to Stadium	£100,000
Station Management Plans	£15,000
Controlled Parking Zone Assessment and Consultation	£100,000
Controlled Parking Zone Implementation and Operational Delivery Contribution	£230,000
Travel Plan Bond	Up to £250,000
CCTV Contribution	To be agreed post decision following Operational Requirement Assessment as requested by Met Police

Approximate Total	£701,209 to £951,209.66 + CCTV contribution +LETS
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m) Any other planning obligation(s) considered necessary by the Director of Planning and Sustainable Regeneration

(A more expansive summary of how the S106 legal agreement is currently drafted is set out in appendix 3.)

- 3.3 That the Director of Planning and Sustainable Regeneration is delegated authority to negotiate the legal agreement indicated above.
- 3.4 That the Director of Planning and Sustainable Regeneration is delegated authority to issue the planning permission and impose conditions [and informatives to secure the following matters:

Conditions

Standard Conditions

1. Commencement time limit of 3 years
2. Carried out in accordance with the approved drawings

Pre-commencement

3. Tree Protection Plan.
4. Archaeological works
5. Construction Logistic Plan and Construction Environment Management Plan

Pre-commencement (apart from some works)

6. Contamination
7. Drainage Strategy
8. Water Supply Infrastructure

Prior to commencement of superstructure

9. Main stand detailed design
10. Arthur Wait/Holmesdale Road Infill detailed design
11. Landscaping
12. BRE solar dazzle study in connection with materials chosen
13. Biodiversity Enhancement Strategy
14. Secure by Design
15. CCTV
16. Revised Fire Strategy

Prior to demolition of Wooderson Close properties

17. Plan, elevation, details of flank elevation of no.20 (including details of structural works)

Prior to Practical Completion

18. Landscape and Public Realm Management and Maintenance Strategy
19. Community Use Strategy
20. Lighting strategy – wildlife and amenity
21. Cycle Parking Strategy
- 22.

Prior to First Occupation

23. Refuse and recycling strategy
24. Delivery and Servicing Plan

Prior to Relevant Stage of Work

25. Gates, Barriers details
26. Details of extract systems
27. Details of air handling units, plant and machinery
28. Infiltration of Surface Water not allowed unless written confirmation received.
29. Piling Method Statement prior to any piling being undertaken.

Time limit

30. Further ecological surveys if development has not commenced within 18 months

Compliance

31. Control of use and opening hours
32. Number of matches and events restrictions.
33. No roller shutters
34. Compliance with Ecology Appraisal Recommendations
35. Thresholds
36. BREEAM Excellent
37. EVCP provision – 25 active Car Parking Spaces, rest passive.
38. Disabled parking provision
39. Air handling plants, mechanical plants and other external fixed machinery noise requirements.
40. Noise Assessment
41. Air Quality Assessment
42. Water Efficiency
43. Whole life cycle and circular economy
44. BNG and UGF

Removal of Permitted Development Rights

45. Telephone Masts and other similar equipment
46. Any other planning condition(s) considered necessary by the Director of Planning and Sustainable Regeneration

- 3.5 That the Committee confirms that adequate provision has been made, by the imposition of conditions, for the preservation or planting of trees as required by Section 197 of the Town and Country Planning Act 1990.
- 3.6 That, if by 20th January 2023 the legal agreement has not been completed, the Director of Planning and Sustainable Regeneration is delegated authority to refuse planning permission

4. BACKGROUND

Pre-Application Committee

- 4.1 An earlier iteration of this proposal was presented to the Planning Committee at the pre-application stage on 25th January 2018. A summary of Members' comments is provided below:
- Concern over the loss of housing and noted that replacement housing proposals should form part of any application:
 - Tenants may need to be rehoused locally and that it would be important to look at and meet tenant needs.
 - Lack of understanding in terms of impacts for remaining occupiers of Wooderson Close.
 - Queried whether the "Main Stand" expansion could be done in a way that avoids the loss of housing.
 - Expressed support for the Club and its aspirations but wanted to ensure the capacity increase would be safely managed.
 - Noted that footpaths get packed with people on match-day, with pedestrians spilling onto the road; concern raised that with another circa 8,000 spectators, the situation would get worse.
 - Requested that management and measures to improve pedestrian safety when leaving games are submitted with the application.
 - Raised concern that the scheme was not ready and that the pre-application seemed rushed. There was also concern that there was no apparent plan for replacing housing, with Members requesting more detail on proposals.
 - Raised concern that with an imminent planning application submission date, there would be little time to take issues raised as part of any consultation process into account.
 - Raised concern about the potential for the new stadium to divert trade from existing businesses.
 - Welcomed the commitment to sign up to the Council's good employer charter and commit to the London Living Wage for staff.
 - Considered that public realm enhancements beyond the ground should be undertaken as part of the scheme.
 - Expectations that the application will be accompanied by a Travel Plan
 - Generally welcomed the investment and felt it was very important the new stand enhances wider area, setting a benchmark for future expansion.

- Members noted that the best view of the main façade would be from the car park and as such, a piazza area for fans to congregate in front of the façade should be fully embraced.
- Considered that a master plan would help on into the future.

Place Review Panel

4.2 The proposal was presented to Place Review Panel (PRP) on the 18th of January 2018. A summary of the advice of the PRP's advice is provided below:

- The PRP lauded the club's commitment to the existing site and strongly supported the ambition to enhance facilities. The panel was happy with the scale of the building, noting that it was no taller than the Holmesdale Road stand, and accepted the rationale for the curved form of the stand to reduce its imposing nature on neighbouring development. The bold striking design concept including incorporation the Crystal Palace Football Club branding to strengthen the identity of the building was supported. The PRP however identified several aspects of the design which required further development to ensure this large scheme sits well in its context, to maximise the potential of the scheme and its community benefits. (Officers note it would be approximately 8m taller than the Holmesdale Road stand).
- The elevational treatment of the front and flank elevations required design development to increase coherence of the design. They advised that there could be a technical issue with glare caused by the large amount of west facing glazing.
- It was recommended that the VIP parking be relocated and replaced with a public square to provide a destination space where fans and local community can congregate and enjoy views of the stand. The ground floors of the building require activation with commercial uses and openings to enliven the public realm.
- A coherent wayfinding strategy to and within the ground incorporating innovative design could significantly enhance the experience of the stadium.
- Several houses proposed for retention on Wooderson Close are located too close to the stand and specific proposals for the replacement of affordable housing proposed for demolition must be provided. The panel wanted to see further assessment and analysis of these likely impacts.

5. PROPOSAL, APPLICATION BACKGROUND AND LOCATIONAL DETAILS

Site and Surroundings

5.1 The application site Selhurst Park, has been the home ground for Crystal Palace Football Club (CPFC) since 1924. The site is bounded to the northwest by Whitehorse Lane, to the northeast by Park Road, and Holmesdale Road to the southeast. The site also includes six three storey terraced houses located in Wooderson Close as well as adjacent highway land. Five of these houses are rented and are owned and managed by the Council as affordable housing.



Fig 1 – Aerial View of the Site and Immediate Surrounds (Source - Google Earth)

5.2 The existing stadium has four stands that surround the pitch, namely the Main Stand, which adjoins the Club car park and fan zone, the Holmesdale Road Stand, adjoining Holmesdale Road and featuring a distinctive curved roof, the Arthur Wait Stand, adjoining Park Road and which mostly accommodates away fans, and the Whitehorse Lane Stand, which partially over-sails the adjoining Sainsbury's supermarket. The main stand is the oldest stand and was opened in 1924.



Fig 2 – Basic Stadium Layout

5.3 To the south of the Main Stand, are two distinct car park areas. The largest car park which contains 353 car parking spaces is located at the western end of the southern part of the site, and whose primary function is serving Sainsbury's supermarket. For the purpose of this report, this will be referred to as Sainsbury's car park. To the east of this car park, is a smaller car park, containing up to 126 car parking spaces. This car park primarily serves the club and includes other ancillary functions such as fan zone. For the purpose of this report, this area will be referred to as the club's car park.

- 5.4 The area is predominately residential in character, although the site itself contains a supermarket (currently operated by Sainsbury's, but which also includes a pharmacy and key cutting/shoe repair shop), club shop and nightclub (currently closed), and there are number of small commercial units mostly in Class E use (formerly A use class) along Whitehorse Lane. There is also a petrol station immediately adjacent to the site on Whitehorse Lane.
- 5.5 The topography within and around the site varies considerably, with highest point being at the northeast corner of the site, at the junction of Park Road and Holmesdale Road, and the lowest level being around the fan zone within the club car park to the south of the Main Stand.
- 5.6 Public Transport Access Level (PTAL) is a measure of connectivity by public transport, with scores ranging from 1a (poor) to 6b (excellent). The PTAL varies across the site. The lowest PTAL of 2 is scored at the Sainsbury's entrance, with the highest PTAL of 5 scored along Holmesdale Road. The site is approximately 600m from Selhurst Railway Station, 615m from Norwood Station and 900m from Thornton Heath Railway Station. The site is near a number of bus routes, including 468/X68 that stops on Whitehorse Lane and 130 that runs along Whitehorse Lane and Park Road (although the routes changes on match days).
- 5.7 The site does not fall within a designated conservation area nor does it contain any statutory listed or locally listed building. In addition, there are no heritage assets within the immediate vicinity of the site, whose setting would be adversely impacted by the proposed development.



Fig 3 – Extract from Interactive Policy Map Showing Location of Conservation Area (green hatch) and Locally Listed Historic Park and Gardens (purple dash) and Croydon Panorama's (orange cone)

Proposal

- 5.8 The application seeks planning permission for the:
- Extension of the Main Stand, to provide additional spectator capacity (8,225 additional). The extended stand would contain Use Class D2 (assembly, leisure

and entertainment) floorspace (24,522m²) consistent with the operation of the football club, as well as a retail /restaurant (A1/A3) unit (550m²). The footprint of the proposed Main Stand would be extended to cover an additional 0.83 ha of land.

- Demolition of six houses, and alterations and reorganisation of the associated parking facilities and gardens, including alterations to the flank elevation of no.20 Wooderson Close.
- Reorganisation of the club and superstore car parks, and alteration and expansion of the site accesses from Holmesdale Road and within the car parking area from Whitehorse Lane.
- Pitch lengthening (from 101.5m to 105m), and the creation of accessible seating within the Whitehorse Lane Stand (spectator capacity reduced by 690 as a result of lengthening the pitch).
- Creation of replacement spectator capacity (683 additional) to the corner of the Holmesdale Road and Arthur Wait stands.
- Reorganisation of floodlighting, and removal of three of the flood light masts.
- Removal of the TV Gantry at the Arthur Wait Stand.



Fig 4 – CGI of Main Stand Development from Sainsbury's Car Park.

5.9 Since the 2018 planning application committee, in summary the following physical revisions have been made to the application:

- External change to the west elevation with revised positioning of entrances at ground floor. Internal alterations mainly to stair and lift cores including provision of additional evacuation lift and provision of partitions to separate lobbies.
- Revisions to the landscaping and public realm scheme, including revised tree planting scheme.

5.10 The application reduces the capacity of the Whitehorse Lane Stand, but increases the capacity of site overall, by increasing capacity within the main stand, and by introducing seating between the Arthur Wait Stand and Holmesdale Road Stand. This is set out in the table below:

Stand	Existing	Proposed	Change
Main Stand	5,627	13,500	+7,873
Holmesdale Road Stand	8,176	8,859 (includes 683 additional in the corner of the Holmesdale Road and Arthur Wait stands)	+683
Arthur Wait Stand	9,769	9,769	+0
Whitehorse Lane Stand	2,725 + 24 executive boxes	2,131 + 24 executive boxes	-594
Total	26,297 + 24 exec boxes	34,259 approx. + 24 exec boxes	+7,962

Fig 5 – Existing and Proposed Stand Capacity

5.11 The existing Main Stand is 16m high as measured from ground level (68m Above Ordnance Datum, AOD). The existing Holmesdale Road stand is notably taller. The proposed Main Stand would be up to 40m high from ground level (92m AOD), an increase of 24m, and approximately 8m higher than the existing Holmesdale Road Stand. Concerns have been raised in objections over the subjectivity over what defines a storey height, and how that relates to what it typically considered to be a storey. To avoid any confusion reference will be made and consideration given to the actual height rather than storey height, and we would advise members to do the same.

The application still refers to use classes as they were at the time the application was submitted. Planning applications as set out in the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020, which were submitted before the 1st of September 2020 that cite the previous use class order before that date, should continue to be determined using the former use class order. To aid understanding a comparison between previous use classes, and current use classed related to the application are set out below:

Use Class Order at time of application submission	Uses as per the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020
A1 (Retail)	In this instance Class E
A3 (Café or restaurant)	Class E
D2 (Assembly and Leisure)	In this instance Sui Generis

Fig 6 – Use Class Order Comparison

Application Background

5.12 The site's most dominant use is associated with the playing of football by the Crystal Palace Men's first team. The number of games played by the club's men's

first team varies dependant on league competition which the club are in, and entries and progress within cup competitions. At least 19 home league games are played a season. Most of these games are played at weekends. Other teams associated with the club, including women's team and youth teams do play at the stadium on occasions, but at this time are not as well attended.

- 5.13 On men's first team home match days, a temporary road closure is put in place on Park Road and Holmesdale Road. The road closures are operative during, as well as for a period before and after, each home game. This is implemented via the way of a Traffic Management Order (TMO).
- 5.14 The Main Stand contains most of the club's administrative and operational functions. This includes hospitality lounges; players, officials, and team staff facilities, and media areas. The main stand hospitality lounges are available to hire on non-matchdays, for example for conferences, weddings and parties. The club operate a foundation, called Palace for Life. It delivers health, education, and sporting programmes for more than 13,500 local children and young adults.
- 5.15 The club has highlighted that the current main stand is the oldest stand in the Premier League and is not able to properly accommodate the club's necessary day-to-day and match functions, which this application is intended to address. The club has highlighted the following deficiencies in particular:
- the TV filming gantry suspended from the Arthur Wait Stand roof obstructs spectators' views, and causes a poor TV image owing to its South West aspect, facing the afternoon sun.
 - the pitch has a 101.5m length, 3.5m short of the standard required for international fixtures.
 - the number of wheelchair positions is below Premier League standards for new stadiums.
 - the stadium has a lack of catering and other attractions (for example suitably sized club shop and museum) when compared to other Premier League grounds.
- 5.16 The lack of facilities on site means there is little to attract fans to attend the ground other than to watch matches. Fans tend to arrive shortly before 'kick off' and leave shortly after the 'final whistle', causing large number of people to arrive/leave at the same time, placing great strain on local infrastructure, including public transport and surrounding roads.

Planning History

- 5.17 The following planning decisions are considered relevant to the application:

77/20/997 dated 19/12/1977 approved the Whitehorse Lane end redevelopment to create 26 flats and a retail supermarket, with ancillary facilities, alterations to vehicular access and car park and replacement of some of the football stadium facilities.

A number of conditions are imposed on the consent to ensure the supermarket is not open to the public 3 hours before or after first team home fixtures and allows for the supermarket car parking areas to be appropriately controlled on match and non-matchdays.

This planning history is relevant in that the “Main Stand” is proposed to be expanded over a part of the Sainsbury’s car park and the club’s car park which would facilitate required changes to the car parking layout and arrangements. Sainsburys has been served notice by the applicant (in view of ownership arrangements) and it is understood that the applicant is in detailed dialogue with the supermarket chain to ensure that the proposed alterations to the car parking and access arrangements are acceptable to both parties.

86/01940/P dated 17/3/1987 approved an application for the erection of 16 x 3 bed houses and 16 x 4 bed houses along Holmesdale Road and Clifton Road.

It is of note that the approved plans show that 4 of the houses described as being located along Holmesdale Road, are actually approved to be built to the west of Holmesdale Road (fronting onto Wooderson Close and backing onto the access-way into the club car park – accessed off Holmesdale Road).

87/3645/P dated 29/3/1988 approved the erection of 12 x 3 bedroom and 16 x 4 bedroom houses along Holmesdale Road and Clifton Road.

These planning permissions (i.e. 86/01940/P and 87/3645/P) are relevant in that the expanded Main Stand would encroach onto housing land and result in the need to demolish some existing housing in Wooderson Close.

90/2313/P dated April 1991 approved the development of the Holmesdale Road Stand, which was subsequently completed in 1995, and represents the last major development at the stadium, bringing its spectator capacity up to circa 26,000.

22/01561/PA8 dated June 2022 approved for the Installation of 1No. 20m monopole supporting 12No. antennas and 2No. 600mm dishes with wraparound cabinet. Installation of 6No. cabinets at ground level, all surrounded by 1.2m high bollards and ancillary development thereto (Prior Approval under Part 16 of the GPDO 2015 (as amended)).

These works are proposed within the existing northwest car park that serves the Sainsbury’s food store.

6. SUMMARY OF KEY REASONS FOR RECOMMENDATION

- 6.1 The principle of expanding the stadium is supported and will help ensure that the ground remains the long term home of Crystal Place Football Club, which is an important economic, cultural and social institution in the borough. The loss of existing housing and associated land, the majority of which is affordable housing, can be replaced and secured through a legal agreement to ensure there is no net loss of either in the borough.

- 6.2 The proposed development would be classed as a tall building, and meets the requirements of London Plan (2021) policy D9. The proposal does not meet the locational aspects of the policy (Part A and B), but meets the detailed requirements of the policy (Part C) as detailed in paragraphs 11.28 onwards of this report. Once the policy and the development plan is read as whole, the proposed tall building is, on balance, acceptable.
- 6.3 The proposed development is of exemplar design, which would positively contribute to the character and appearance of the area, forming a new landmark. No heritage harm would be caused by the development. The proposed development has appropriate landscaping including tree planting and achieves an acceptable Urban Greening Factor score given the constraints.
- 6.4 The proposed development would have a minor adverse impact on neighbouring amenity. However, mitigation measures are proposed as far as can be achieved in the context of the scope of the development. The resulting living conditions would still be good and appropriate for the context, and outweighed by the significant benefits of the development in any event.
- 6.5 The proposal aims to achieve a significant modal shift to sustainable modes of transport not only to those within the stand, but the stadium as a whole. These modal shifts would be encouraged through a series of obligations and measures. This would help ensure that the development does not have an unacceptable impact on traffic or on parking stress.
- 6.6 The development, subject to the recommended conditions and legal obligations meets current environmental sustainability policies and standards. The development would also comply with the relevant policy requirements regarding emergency resilience including fire safety.
- 6.7 The development's impact on equality and creating inclusive communities is set out in the body of the report. The development secures the long term continuation of community uses at the site. The development provides substantial public economic, social and cultural benefits that weigh positively in the consideration of the application.

7. CONSULTATION RESPONSES

Responses from Statutory and Other Organisations

- 7.1 The following organisations were consulted regarding the application:

Greater London Authority (Statutory Consultee, GLA)

- 7.2 The planning application is referable through a 2-stage process to the GLA, under The Town and Country Planning (Mayor of London) Order 2008. The GLA previously made comment in regards to the application as part of the Stage 1

referral process in 2018 and stage 2 referral process in 2020. The application was referred back to the GLA, which resulted in them issuing a new stage 1 response on the 30th August 2022 and requires the application to be referred back to them at Stage 2 (after the Planning Committee decision). The summary of the GLA Stage 1 response is outlined below:

Land Use Principles: The principle of the extension of the sports stadium was agreed as part of the resolution to grant in 2018 and confirmed with the 2020 GLA Stage 2 report. Having regard to the current policy context, including the London Plan (2021), the principle of the land use remains acceptable. The six (6) lost housing units will be re-provided in accordance with London Plan Policies S5 and H8

Urban Design: The site is not in a location identified for tall buildings and does not comply with Part B of London Plan Policy D9. The visual and functional impacts are considered acceptable. The environmental impacts will be considered as part of the Mayor's decision-making stage. The approach to fire safety is acceptable. The other urban design issues are the same as the 2018 application.

Transport: Clarification requested on parking, match-day surveys to be undertaken and any pedestaling improvements identified secured through the s106, Travel Plan should be strengthened and secured through s106 and previous s106 mitigation and contributions to be secured.

Sustainable Infrastructure: Further information is required in relation to energy, WLC and circular economy.

Environmental Issues: Further information is required in relation to urban greening, biodiversity, trees, and sustainable drainage.

Transport for London (Statutory Consultee, TfL)

7.3 TfL considered the application and in summary raised the following issues:

- Funding to cover the cost of completing works identified in the PERS audit should be secured through s278/s106
- Pedestrian and Cycle environment assessments need to be undertaken and findings agreed the cost of completing works identified secured in the s106
- Wayfinding strategy agreed with the Council and all costs covered through the s106 agreement
- Long stay cycle parking provided, further information on short stay provision to be provided
- Coach parking provision to be explored
- Taxi drop off / pick up facilities investigated
- £15,000 Contribution towards bus stand and count down provision
- Car parking reduced, all spaces allocated, charged managed
- Additional information on EVCP and Blue-badge parking to be provided

- CPZ to be extended, all costs covered and secured through the s106
- Travel Plan to be reviewed and secured through s106 along with performance bond
- A cap is secured against the number of first team games that could be held at the stadium
- Car Park Design and Management Plan, Construction Logistics Plan and Delivery and Servicing Plan secured by condition
- Rail: Improvements to Norwood Junction are being considered as part of the Brighton Mainline Upgrade and will look to reconfigure platforms, deliver step free access and improve passenger flow throughout the station. TfL and Network Rail therefore seek a minimum contribution of £100,000 towards improvements at this station.

(PLANNING OFFICER COMMENT: The request for funding towards Norwood Junction station is problematic. Planning legislation (regulation 122 of the Local Government Act) states that in order to secure a planning obligations, the need for the mitigation measure must be directly related to the development.

Network Rail have advised that there is no causal relationship between the expansion of the Main Stand and the need for enhancements at Norwood Junction. Network Rail advise the works are needed as a result of the Brighton Mainline upgrade project (although this has understood to have been paused) and are not directly related to the impact of the proposed development (this therefore does not meet the tests set out in Regulation 122).

The Applicant is concerned that the nature of work required at Norwood Junction could vary significantly depending on the extent of the Croydon Area Remodelling Scheme (which is a main element of the Brighton Mainline Upgrade Programme). The concern being that an independent study has identified that undertaking works at Norwood Junction prior to the Upgrade Programme may ultimately end up being abortive.

The Applicant has advised that wish to maintain a continuing dialogue with Network Rail (and train operating companies) in respect of the broader Upgrade Programme and the timing of initiatives that may form part of it.

A planning obligation is to be secured which will require the Development of Station Management plans with local transport operators including for Norwood Junction, and this will include funding for to investigate options and funding the implementation of measures at Norwood Junction station, as well as Selhurst and Thornton Heath Stations.

However the Applicant has not agreed to make a £100,000 contribution towards Improvements to Norwood Junction that are being considered as part of the Brighton Mainline Upgrade. In view of the situation, no objection is raised.

Environment Agency (Statutory Consultee)

- 7.4 The Environment Agency have confirmed that they have no objection to the application subject to certain conditions (which are recommended) being imposed on any consent granted.

Lambeth Council (Statutory Consultee):

- 7.5 In summary the London Borough of Lambeth have confirmed that they have no objection to the application. Any increase in car parking demand is likely to further exacerbate parking stress. As such Lambeth advise the applicant to ensure that there are appropriate measures in place to reduce the impact of the projected increase in car travel demand.

Historic England - Archaeology

- 7.6 The archaeology team at Historic England have confirmed that no further assessment or conditions are necessary with regards to archaeology.

Thames Water

- 7.7 Thames Water have confirmed no objection to the proposal subject to conditions requiring details of any piling, a drainage strategy (detailing any on and/or off site drainage works) and an impact study of the existing water supply infrastructure to be submitted and agreed in consultation with them being attached to any planning permission granted. Thames Water have also requested informatives relating to surface water drainage and advising of the presence of a main crossing the site which may need to be diverted at the developer's cost.

Sport England

- 7.8 Raise no objection to the proposals.

Premier League

- 7.9 Premier League have written to support the application. They highlight the substandard facilities of the existing stand, and stressed the need for modernisation, and the wider benefits this has including local spending, benefits to local community and in terms of inclusivity.

Football Association

- 7.10 Support the application

Lead Local Flood Authority

- 7.11 The Lead Local Flood Authority have no objection subject to conditions.

Metropolitan Police Service Designing Out Crime Officer

- 7.12 The development should achieve secure by design standards and also that there should be CCTV covering all entrances and exits, as well as the routes between the club and Norwood Junction Station and Selhurst Station.
- 7.13 The Police set out specifications for lighting and other matters, and additionally have recommended that the recommendations set out in the Application submission relating to safety and security are secured by way of planning obligations and conditions.

Metropolitan Police Counter Terrorism Security Adviser:

- 7.14 Raises no objection subject to conditions and planning obligations to secure better management and control of the Sainsbury's car park on match days, in particular to separate pedestrians from vehicles. Additionally, require hard landscaping to accord with ratings set out in the supporting document (WSP CPFC HVM 002); funding for the implementation of the landscape measures; and require that the detailed proposals be agreed by the Metropolitan Police.

London Fire Brigade

- 7.15 Lack details on whether there would be compliance with building regulations and other guidance.

(Officer Response – the LFB comments have been forwarded onto the council's Building Control Officer. He has confirmed that in his opinion the issues raised are resolvable, and will be captured in other stages of the procedure, including through revised Fire Strategy and Building Regulations.)

Sainsbury's:

- 7.16 Raise no objection in principle, but highlight the following concerns:

- There is a lack of analysis to justify car parking reductions and alterations to car parking managements.

(Planning officer comment: This is dealt with in the committee report. The council has reviewed CCTV images in 2018 that show the vacant car parking levels in the Sainsbury's Car Park. The CCTV images were taken every hour on a weekday afternoon/evening between 4:30pm and 22:30pm, and a Saturday between 7am and 6pm. The proposal would result in the loss of 22 car parking spaces from Sainsbury's Car Park, and it has been observed that many more than 22 spaces were vacant at peak times. Changes in population or car ownership are not foreseen to significant shift such that it would generate an increase in car parking space demand for the retail store. Officer on site observations support in 2022, still support this evidenced finding.

Neither TfL nor the Council's Highway Officer have raised any objection to the loss of car parking. As part of planning permission 77/20/997 dated 19/12/1977 there are a number of conditions imposed to prevent the store being open to public 3 hours before and after a match. It is considered that matchday operational changes, including the car park management plan, resulting from the development would not significantly impact the operation of Sainsbury's store. The car park management plan is recommended to be secured via condition. It is reasonable to assume that the Club will consult with Sainsbury's in the preparation of the management plan.

A Condition is recommended to prevent excessive number of football games that can be played at the stadium or large events, which provides a greater level of control than currently is the case.)

- Construction activities will disrupt the operation of the store.

(Planning officer comment: Conditions are recommended to ensure that the impact of the development during construction is appropriately mitigated to prevent the development having unacceptable impact on adjoining businesses and residential properties, within the limitations of planning legislation. The impact of the proposed loss of parking on Sainsbury's store is considered above.)

- That the application fails to create a safe and secure environment for our colleagues and customers.

(Planning officer comment: The proposals have been considered by the Metropolitan Police who are satisfied that (subject to conditions and planning obligations, for example to secure the installation of appropriate barriers/gates and CCTV) the proposals would design out crime and deter terrorism, assist in the detection of terrorist activity and help defer its effects. These measures are wide ranging and would not only benefit supporters attending the game, but would also indirectly highly likely to improve the safety of customers and staff members of Sainsbury's. Officers are satisfied that the development would not have an adverse impact on the safety and security of Sainsbury's staff or customers.)

- That Sainsbury's have not been sufficiently engaged on the application.

(Planning officer comment: Officers are satisfied that the consultation is in accordance with statutory requirements and has been wide ranging and robust.)

8. LOCAL REPRESENTATION

- 8.1 The application was publicised when originally submitted in 2018, and again in 2022 following receipt of updated documents.

2018 Publicity

- 8.2 The application was originally publicised by way of site notices displayed in the vicinity of the application site. The application has also been publicised in the local press and letters were sent to 510 nearby occupiers. The number of

representations received from neighbours, local groups etc. in response to notification and publicity of the application as reported in the 2018 committee report were as follows:

No of individual responses:

Objecting: 84 (+16 in addendum)

Neutral: 31

Supporting: 4,444 (+61 in addendum)

No of petitions received: 0

8.3 In summary the objections raised the following issues:

- The development will worsen traffic congestion and on street parking pressure on matchdays
- Fans take all the parking spaces in surrounding roads and even park across drive ways.
- Residents are effectively imprisoned until an hour or more after the end of the match, due to crowds of fans and complete gridlock of the local roads. Another 8,000 fans would make this worse
- The loss of car parking on the site will mean more fans park in surrounding streets, exacerbating existing issues.
- A matchday Controlled Parking Zone (CPZ) must be implemented to alleviate parking stress experienced by neighbours on matchday
- Offsite highway works must be undertaken to improve traffic flows on matchdays
- The transport assessment submitted is flawed. Matches at the stadium currently lead to lots of highway congestion in the area surrounding the stadium for a significant amount of time before and after matches. This has not been adequately identified nor have suitable arrangements been suggested to help accommodate an increased number of trips to the area resulting from the expansion.
- The number of fans at the local rail stations means that the stations become dangerously overcrowded. There needs to be an increased number of police officers at the main train stations.
- The footpaths become overcrowded with fans before and after a match making it hard for elderly residents to walk in the neighbourhood.
- If even half of the proposed supporters were to use their cars to travel to the ground this would be an increase of around 4,000 vehicles into the area. This would increase the traffic congestion on matchdays to an amount not able to be managed by the current road network.
- The scheme will result in additional on street parking, unless a CPZ is introduced, however this will inconvenience residents and cause them significant expense.
- There has been no actual plans submitted as to how supporters might be persuaded to travel by public transport e.g. Bus or rail. I feel that the whole submission lacks any substance. There appears to be no consideration of the impact on this greater area.

- Access for emergency vehicles would be hampered if they needed to gain access around these time.
- The Club should cover the cost of police presence on matchdays, as well as picking up litter left by fans,
- Fans buy food in local takeaway food shops and drop the associated litter in the local areas
- People who live in the surrounding area are affected for at least a mile radius on matchdays, residents are unable to go to work/shop or conduct their personal life without major inconvenience.
- The development will result in the loss of homes, displacing residents
- The design of the new Main Stand is not in keeping with the neighbourhood
- The way the new stand joins onto the remaining stands looks unsightly
- The scale of the new stand is inappropriate and overly dominant
- The main stand will be the equivalent of 10 storeys high not the 5 advertised in the press and by the club. The massing is disproportionate to surrounding terraced housing. All visuals used are from oblique angles and some of the key visuals have been omitted. The design of facade appears to be compromised and confused.
- There should be a plan to implement stadium-led urban regeneration as part of this scheme. More street cleaning, assisting new businesses, new homes etc.
- There is no detail of the impact on remaining residents in Wooderson Close from the demolition of housing proposed and construction work to carry be carried out.
- Light spill from existing stadium lights affects the amenity of neighbours and this could be made worse
- At the moment, coaches for away fans park all the way up Park Road, close to residential properties, allowing overlooking to occur from passengers in the coaches to windows in neighbouring properties. Given the extra capacity for away fans there should be a dedicated car park for coaches that is away from our residential area and completely unobtrusive.
- There is an issue with people urinating against fences and gardens and throwing rubbish into front gardens of existing residential properties.
- The negative impacts of the development will cause a decrease in house prices locally
- The noise and disturbance associated with the development will adversely impact on nearby residents
- Fans are often engaged in antisocial behaviour which will be exacerbated by the increased capacity
- Fans make considerable noise and cause lots of disturbance which adversely impacts on the amenity of neighbours
- There is a general lack of consideration by the Club of the adverse impacts to local residents as a result of matchdays (parking problems, abusive fans, traffic jams, rubbish discarded on streets.
- Noise and disturbance during the construction phase will have significant adverse impacts for nearby residents
- There will be overlooking of nearby residential properties from the new stand (resulting in a loss of privacy)
- The size of the stadium is such that it will overshadow neighbouring residential properties, adversely impacting on amenity

- Community facilities should be provided and paid for by the Club
- Sainsbury's may close and this loss of a supermarket would be inconvenient
- The consultation has not been wide enough, and what consultation has been undertaken to date is not satisfactory.
- The new stand may be unviable, and in trying to recoup the cost of the development, the Club may be forced to engage in corporatism, gentrifying ordinary fans.

8.4 In summary the submission in support of the proposal highlighted the following matters:

- There is a real need for the enhancements, existing facilities need to be upgraded to ensure compliance with relevant legislation and standards and to ensure the facilities are fit for purpose.
- The application represents an exciting prospect for not just the fans but for the community at large in the way of jobs and economic prosperity. The club is an integral part of the fabric of this community having been located at Selhurst Park since 1924.
- This redevelopment providing a one off opportunity to make significant improvements to the districts surrounding the ground. Every matchday this community facilitates the arrival of thousands of people which clearly impacts on the local infrastructure and residents lives.
- The Community Infrastructure Levy and the significant Section 106 planning obligations secured to mitigate the impact of the development will be spent on making improvements to the infrastructure or within the communities surrounding the ground.
- Businesses will benefit from the increase footfall on matchdays (including stallholders).
- There will be additional jobs created during construction and when the new stand is operational.
- The design is iconic and appropriate given the relationship to the rest of the stadium and wider area.

2022 Publicity

8.5 Further public consultation was carried out in 2022 on the revisions received to the application, with letters/emails sent to neighbours and objectors, through the display of site notices and publication of a press notice. As it currently stands, the system records the following numbers (although there may be some double counting).

Objecting: 132

Neutral: 33

Supporting: 4,692

No of petitions received: 0

8.6 The comments received since the previous committee in 2018 are summarised as follows

- Light pollution

- Glare
- Overlooking
- Lack of privacy
- Loss of Mature Trees
- Loss of amenity (for residents)
- Lack of consideration for Sustainability - revising a drainage strategy is not addressing
- Sustainability as a key driver for the design which should be essential for all major developments after COP26 Climate Summit.
- Loss of Housing to the area with the demolition of 6 perfectly good and habitable homes to Wooderson Close
- Mass and scale, lack of consideration for surrounding buildings. The revised drawings are much bigger than advertised by the football club in the press where they described the new stand only 5 storeys high.
- Concern how the residents are being treated by the club, the council, and the significant stress that the delay and uncertainty is having on the residents.
- Restaurant/retail unit will have an adverse impact on the operation of the high street.
- Size of the stand, is completely overbearing and out of keeping
- Concerns over litter
- Parking concerns, need for parking control that is enforceable. Need for pickup truck to deal with people blocking up driveways,
- Pressure on transport services
- Cycling is not realistic
- Loss of privacy/ overlooked by terrace areas.
- Noise – construction
- Noise – Impact from games/large events
- Shouting, anti-social and criminal behaviour
- Concern over rubbish
- Concerns around consultation process
- No in-depth study on how no.20 can be saved from demolition.
- Lack of social value from the development.
- The application is full of counterfeit truths, consideration should be given to reflect people are being evicted from their homes.
- The club should confirm their further expansion timeline.
- Fantastic contribution to Croydon as whole – employment opportunities, increased local business opportunities and need for the club to improve facilities.
- Support letter of local business stressing their reliance on CPFC, and how this application will help them survive.

8.7 Residents have also written suggesting amendments be made to the S106 legal agreement. The amendments requested are summarised below:

- The club should be encouraged to pay the London Living Wage
(Officer Response – *The club are already affiliated and pay the London Living Wage.*)
- Signage from station need to be improved and more stewards

Officer response – *Wayfinding signage contribution is already secured. Stewarding arrangements are managed by the club, and it would be excessive for the council to place further requirements or interfere on this.*

- Bus stop improvements should include bins
Officer response – This is considered beyond the scope of the application, especially given the installation and collection of such bins would fall on the council not the club.
- Further crossing are needed
Officer response – There is insufficient evidence to suggest that further crossing are needed in order to make the scheme acceptable.
- Cycle routes needs local resident agreement.
Officer response – The consultation processes around the installation and improvement of cycle routes is subject to separate processes, and as part of wider project that goes beyond the application.
- CPZ public consultation
Officer response – Money is secured for public consultation on a potential CPZ.
- Traffic Enforcement
Officer response - Enforcement day to day arrangements are beyond the scope of planning. However, implementation of a CPZ would increase resource capability and likely to improve parking violation enforcement.
- Litter picking/portable toilets
Officer response – The commitment secured in current drafted s106 are in officers view as far as reasonable can be required given the limited scope of the application and that this is an extension. The measure secured are improvement over the existing situation.
- New trees should be planted
Officer response – This is not sought as not required to make application acceptable and therefore would be unreasonable to require.
- Traffic Management
Officer response – As far as relevant to the application, the existing traffic management orders likely to be reviewed as part of the application implementation process as outlined in the S106, together with the other transport planning measures proposed.
- Wooderson Close highway reconfiguration and consultation
Officer response – This would be subject to separate part of the process and other legislation.

8.8 The above concerns or matters of support that are material to the determination of the application, are addressed in substance in the 'MATERIAL PLANNING CONSIDERATIONS' section of this report, or by way of planning condition or planning obligation.

9. ENVIRONMENTAL IMPACT ASSESSMENT

9.1 The scheme fell within the criteria of Schedule 2 of the Environment Impact Assessment Regulations (as an urban development project). Detailed consideration of the scheme against the criteria listed in Schedule 3 of the EIA Regulations was undertaken under application reference 18/00567/ENVS (EIA screening).

9.2 Given the nature of the proposal and the information provided, it has been determined that the development is not considered to be of a scale or complexity to require an Environment Impact Assessment.

10. RELEVANT PLANNING POLICIES AND GUIDANCE

10.1 In determining any planning application, the Council is required to have regard to the provisions of its Development Plan and any other material considerations. Details of the relevant policies and guidance notes are attached in Appendix 1.

National Guidance

10.2 The National Planning Policy Framework (NPPF, 2021), online Planning Practice Guidance (PPG), and the National Design Guide (2019) are material considerations which set out the Government's priorities for planning and a presumption in favour of sustainable development.

10.3 The following NPPF key issues are in particular relevant to this case:

- Ensuring the vitality of town centres
- Promoting healthy and safe communities
- Promoting sustainable transport
- Making effective use of land
- Achieving well-designed places
- Meeting the challenge of climate change, flooding and coastal change

Development Plan

10.4 The Development Plan comprises the London Plan (2021), the Croydon Local Plan (2018) and the South London Waste Plan (2012). The relevant Development Plan policies are in Appendix 1.

Supplementary Planning Document/Guidance (SPD/SPG)

10.5 The relevant SPGs and/or SPDs are listed in Appendix 1.

11. MATERIAL PLANNING CONSIDERATIONS

11.1 The main planning issues raised by the application that the Planning Committee are required to consider are:

- Principle of Development
- Socio-Economic Implications and Regenerative Benefits
- Townscape, Visual Impact and Landscaping.
- Impact on Residential Amenities
- Transportation, Access and Parking
- Environmental Effects
- Energy and Sustainability
- Designing Out Crime and Emergency Resilience

- Equity of Access and Mobility
- Human Rights and General Equalities

Principle of Development

Expansion of the Stadium

- 11.2 London Plan (2021) Policy GG5 'Growing a good economy' seeks to enhance London's global economic completeness and that economic success is shared amongst all Londoners. London Plan (2021) Policy HC5 'Supporting London's culture and creative industries' supports the continued growth and evolution of London's diverse cultural facilities, with supporting paragraph 7.5.3 recognising the economic and social benefits they provide. London Plan (2021) Policy D5 'Sports and recreation facilities' states that development proposal for sports and recreation facilities should increase or enhance the provision of facilities in accessible locations.'
- 11.3 The presence of Crystal Palace Football Club within Croydon brings economic, social, and cultural benefits to the Borough. Croydon Local Plan (2018) Policy DM20 sets out clear support for Selhurst Park to remain the home stadium of Crystal Palace Football Club. The policy states that the Council will ensure that any redevelopment would enhance the Club's position, with a football stadium that makes a significant contribution to the Borough. The principle of the expansion of the stadium is supported.

Loss of Six Houses/Residential Land

- 11.4 London Plan (2021) Policy H8 'Loss of existing housing and estate regeneration' states that the loss of existing housing should be replaced by new housing at existing or higher densities. Croydon Local Plan (2021) Strategic policy SP2.2 states the Council will not permit development which result in a net loss of homes or residential land.
- 11.5 The Section 106 legal agreement as drafted and agreed in principle by the club, requires the applicant to construct or procure the construction of a minimum of six replacement dwellings with at least the same total floorspace, so as not to result in a net loss of homes or residential land in the London Borough of Croydon. Stages of the delivery of the replacement houses/land, are linked to stage of the development of the stadium, in order to provide sufficient legal protection that this important and complex aspect is resolved and delivered. Officers are satisfied subject to S106 legal agreement that there would be no net loss of residential houses or land resulting from the development.

Loss of Affordable Housing

- 11.6 London Plan (2021) policy H8 'Loss of existing housing and estate regeneration' states that demolition of affordable housing, should not be permitted unless it is replaced by an equivalent amount of affordable housing floorspace. This policy requires further financial testing to be undertaken to establish whether it is possible to deliver an uplift.

- 11.7 Five of the six homes that would be demolished by the development are owned by the Council and in use as affordable housing. The Section 106 legal agreement requires the Council to use the proceeds of the sale of the Social Housing Land to purchase five four bedroomed houses in the London Borough of Croydon as replacement for the five four bedroomed affordable homes lost by the development. This would initially be sought to be delivered in Selhurst, South Norwood and Thornton Heath Wards, then in surrounding wards, and then elsewhere in Croydon as a cascade. The S106 legal agreement requires these purchased properties to be provided as affordable rent. The developer is required to meet the reasonable costs incurred by the Council in fulfilling these obligations. Officers are satisfied that subject to S106 legal agreement being agreed, there would be no loss of affordable housing resulting from the development. This is in addition to the requirement to provide replacement residential floorspace.

Rehousing Displaced Residents

- 11.8 Of the six homes being demolished, five are owned by the Council. All properties are currently occupied. As landlord of five of the properties, the Council have confirmed that it would not allow the demolition of the housing unless all of its tenants affected are appropriately rehoused (in homes of a size, quality, tenure, and in a location which meets tenant reasonable needs). The good practice principles that underline this (and ensure that Council's tenants are treated fairly) are set out in the 'Side Letter' agreement. It should be noted that matters in the 'Side Letter' are related to the individual requirements of residents rather than running with the land. As such they are not considered by officers to relate strictly to planning matters and should carry no weight in the decision outcome as a result. They are provided as public declaration of the Council's wider non planning commitment, in partnership with the club (where relevant), to provide reassurance to tenants, members and GLA alike on this nevertheless important element of social responsibility.

Loss of Car Parking

- 11.9 Policy DM30 of the Croydon Local Plan (2018) requires that when there is the loss of existing car parking spaces, that it must be demonstrated that there is no need for these car parking spaces by reference to occupancy at peak times. However, this policy needs to be considered in the context of rest of the Croydon Local Plan (for example SP8.16 that seeks to limit car parking spaces) and London Plan (2021) (for example policy T6 which seeks to restrict parking in accessible and connected places). The development plan more generally seeks to encourage an active and more sustainable modal shift.
- 11.10 The proposal would result in the loss of 74 on site car parking spaces, although there would still be 353 car parking spaces within Sainsbury's car park, and 126 spaces in the club's car park. In practice, the actual peak capacity of the current club's car park is often reduced by events and presence of fan zones, so the number of car parking spaces in operation on match day is often far less. This would remain the case in the future scenario.
- 11.11 Evidence in the form of CCTV images were previously submitted in 2018 demonstrated that there was significant capacity within both car parks on non-

match days. Recent on-site observations support that this remains the case. However, both car parks operate at capacity on match days.

- 11.12 The Transport Assessment indicates that the modal shift that would come forward from the development via the travel plan (and other associated mechanisms such as Controlled Parking Zone (CPZ)) would, despite the increase in capacity, reduce the number of journeys by car. For a weekend game for example this is estimated to be 2,132 fewer people driving to stadium. The proposal would decrease parking demand, and as such even with a reduced on site car parking offer, there would not be increased parking stress on surrounding streets.
- 11.13 In the context of the overall policy position and emphasis on promotion of sustainable modes of transport, and the extent of measures secured through the S106 legal agreement such as Travel Plans, and the potential CPZ expansion that help address parking stress issues (both on match days and non-match days), the expansion of the stadium and associated reduction in car parking on site is acceptable.

Community Use of Facilities

- 11.14 London Plan (2021) policy S1 'Developing London's Social Infrastructure' requires proposal that provide high quality, inclusive social infrastructure that addresses a local or strategic need to be supported. DM19 of the Croydon Local Plan (2018) sets out the Council's position on community uses and it focus on providing and protecting existing community uses. Paragraph 7.32 of the Croydon Local Plan (2018), in the section on Supporting Selhurst Park as the home of Crystal Palace Football Club recognises the "existing role that CPFC has in the community, identifying it as a large scale community and leisure facility that continues to make a significant contribution to local area regeneration, creating opportunities for people to share a sense of pride in where they live, as well as delivering initiatives that support community cohesion and facilitate greater social inclusion."
- 11.15 Parts of the existing Main Stand are available for hire and are occasionally let out to community groups, often at a discounted rate.
- 11.16 There is a clear national, regional and local policy basis for seeking to ensure that the community are able to benefit from the continued use of the spaces within the expanded stand. The S.106 legal agreement as drafted requires the provision of accommodation of no less than 60sq.m for the Palace of Life Foundation at the site (or off site within 1.5km during construction). To provide such accommodation, on-site upon completion at a nominal cost for any defined local community organisation, except on match days and large event days (attended by over 10,000). The S.106 legal agreement provides long terms security and continuation of the community use, which is currently not protected by planning controls. The legal security and improvement of the standard of facilities available to be used by local organisation and Palace for Life Foundation is a public benefit

of social value to the scheme and weighs positively in the consideration of the application.

Out of Centre Uses

- 11.17 Paragraph 87 of the NPPF confirms that 'Local planning authorities should apply a sequential test to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan.'
- 11.18 Croydon Local Plan (2018) Policy DM8 relates to development in out of centre locations noting the circumstances where sequential and impact testing will be required for main town centre uses that are not in an existing centre.
- 11.19 The expanded stand (Use Class D2) is in accordance with Croydon Local Plan (2018) policy DM20. In addition, the NPPF is clear that it is important to recognise that certain main town centre uses have particular market and locational requirements which mean that they may only be accommodated in specific locations. The vast majority of the space in the "Main Stand" will be directly related to the use of the site as a football stadium (it has a functional and physical relationship with the rest of the stadium and could not be located elsewhere).
- 11.20 The existing stadium generates 348 full-time equivalent (FTE) jobs). This is expected to increase to 472 FTE jobs and generate £3.4 million of employment income, once the new "Main Stand" is fully operational. The extended "Main Stand" is expected to result in visitor and off-site expenditure in the order of £9.4 to £12.6 million annually. On balance, officers are satisfied that in this case there would be no unacceptable impacts on the viability and vitality of the Borough's centres.
- 11.21 The scheme also proposes retail and other space which are town centre uses in an out of centre location. These uses could have a competitive relationship with similar uses inside the designated town centres and as such, consideration has been given to whether there are sites inside town centres where the space could go (i.e. sequential testing). The applicant had when they submitted the application undertaken an exhaustive search of sites within the relevant catchment of centres and the results of the analysis shows there are not sequentially preferable sites. There is also some justification that the retail elements (specifically the Club shop) are likely to be reasonably be related to the stadium complex – so that purchases can be made as part of a single trip and related to other functions and hospitality elements available at the ground. The proposal would also not impact on the operation/viability of Sainsbury's such to justify the refusal of planning permission.

Socio-economic Implications and Regenerative Benefits (Employment and Training)

- 11.22 The NPPF (2021) states that planning decisions should help create the conditions in which businesses can invest, expand, and adapt. It states that significant

weight should be placed on the need to support economic growth and productivity. London Plan (2021) policy E8 'Sector growth opportunities and clusters' states that employment opportunities for Londoners across a diverse range of sectors should be promoted and supported along with support for the development of business growth and sector-specific opportunities.

- 11.23 Policy SP3.14 of Croydon Local Plan (2018) states that opportunities for employment and skills training will be considered by means of S.106 Agreements for major developments. The Council will seek to secure a minimum of 20% of the total jobs created by the construction of new development above the set threshold to be advertised exclusively to local residents through the Council's Job Brokerage Service. It is expected that best endeavours be used and that the developer will work with the Council to ensure that the target of 20% employment of local residents is achieved in both construction and end user phase of new qualifying development. This is further expanded on in the Council's Planning Obligations SPD.
- 11.24 Due to the nature of activities at the stadium, the employees at the site (existing and proposed) are (and will not be) employed full time, with many employees working during match-days or one-off events. The Club, including the "Palace for Life Foundation", currently supports 983 jobs (348 FTE) and it is expected that this level will increase to 1,667 jobs (or 472 FTE) and should generate £3.4 million according to the 2018 report of employment income, once the new Main Stand is fully operational. There is also expected to be an additional £6.1 million in supply chain spend, £2.2-3 million off site spend, as well as induced job benefits. The construction of the new "Main Stand" should also lead to temporary construction employment impacts. Based on an investment of £75-£100 million, the redevelopment of the "Main Stand" is estimated to support the equivalent of 430 (FTE) temporary construction jobs per annum (over a three-year period).
- 11.25 The S106 legal agreement as drafted secures a Local Employment and Training Strategy for both construction and initial operation phases, and the applicant's reasonable endeavours commitment to this. The S106 legal agreement as drafted ensure the promotion and delivery of employment, training, and apprenticeships opportunities. It will require targets to be set and monitored, including 34% of total new jobs created to be filled by residents within the London Borough of Croydon during both phases, and requires some of the vacancies to be filled by vulnerable and disadvantaged residents. Up to 10 apprenticeships would be provided. The developer will be required to actively engage with the GLA to seek accreditation under the Mayor's Good Work Standard. There are also monetary contributions to construction and operation phase training. It requires opportunities to be given to local suppliers, businesses and companies within London Borough of Croydon.
- 11.26 Since the previous Planning Committee resolution in 2018, Crystal Palace Football Club have now become an accredited Living Wage Employer. All full

time and part time staff employed directly by the Club and third party contracted staff are paid the London Living Wage. Although this is not specifically a policy requirement, this is much welcomed, and no further commitments around this need to be sought.

Townscape, Visual Impact and Landscaping

Policy Context

- 11.27 The NPPF (2021) places great weight on the importance of achieving well design places. It states that “The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities”. It requires development to visually attractive as result of good architecture, layout and appropriate and effective landscaping, sympathetic to local character and history and to establish or maintain strong sense of place.
- 11.28 London Plan (2021) Policy D3 ‘Optimising site capacity through design-led approach’ requires a design-led approach to optimising site-capacity and establish the best use of land. The policy requires development to enhance local context and to an be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan, through appropriate construction methods and the use of attractive, robust materials which weather and mature well. Policy SP4.1 of the Croydon Local Plan states that development should be of a high quality which respects and enhances Croydon’s varied local character.

Principle of Tall Building

- 11.29 London Plan Policy D9 ‘Tall buildings’ and Croydon Local Plan Policy DM15 (Tall and large buildings) are relevant. The proposed development is taller than 25m in height and notably taller/larger than any other building (outside of the stadium) in the vicinity, and as such meets the definition of a tall building.
- 11.30 London Plan (2021) Policy D9 sets out an approach to tall buildings. It has two central components to its make-up, parts A and B taken together, and then Part C. Parts A and B define what a tall building is and then require boroughs to define the appropriate locations for tall buildings within their development plan. Part C provides criteria which tall buildings are assessed against.
- 11.31 Croydon Local Plan Policies SP4.5 and SP4.6 set out criteria for the locations of tall buildings. These includes locations around well-connected public transport interchanges, where there are direct physical connections to the Croydon Opportunity Area, Croydon Metropolitan Centre or District Centres, where they make a positive contribution to the skyline and image of Croydon, and where they include high quality public realm.

- 11.32 The site is not in an area set out in Policy SP4.5 of the Croydon Local Plan, nor is it explicitly identified in the associated place policy DM47 (South Norwood and Woodside) as suitable for a tall building.
- 11.33 Croydon Local Plan Policy DM20 (Supporting Selhurst Park as the home of the stadium of Crystal Palace Football Club) states that “The Council will continue to support Selhurst Park as the home stadium of Crystal Palace Football Club and ensure that any redevelopment would enhance the club’s position with a football stadium which makes a significant contribution to the Borough.”
- 11.34 When read together, Croydon Local Plan Policies SP4.5, SP4.6, DM47 and DM20 do not preclude the provision of a tall building on the site, and support substantial redevelopment, however they do not explicitly identify the site as suitable for a tall building. Therefore on balance it is concluded that the development does not meet the locational aspects of Parts A and B of London Plan Policy D9.
- 11.35 The interpretation of London Plan Policy D9 has been subject to a High Court judgement in the case of London Borough of Hillingdon, R (On the Application Of) v Mayor of London [2021]. This clarified that a development proposal can comply with policy when read as a whole where it does not meet parts A and B, but does meet the tests of Part C.
- 11.36 Part C of Policy D9 sets out 4 main criteria for the impacts to be addressed by tall buildings: visual, functional, environmental, and cumulative.
- 11.37 As noted above, Croydon Local Plan Policy DM20 offers support for redevelopment on the site which makes a “significant contribution to the borough.” Although this policy does not explicitly support a tall building the existing building is already notably taller and larger than any other building in its vicinity. It is likely that any redevelopment to meet the objectives of DM20 and the club, would in all likelihood continue to be significantly taller than the surrounding buildings. Therefore although the Local Plan policies do not offer explicit support for a tall building in this location, (and therefore is not supported by London Plan Policy D9 as a “tall building” location) there is embedded policy support for a large building on the site.
- 11.38 In any event, it is the view of officers that the proposal complies with part C of London Plan (2021) D9 and complies with the development plan when read as a whole. The consideration of visual, functional, environmental, and cumulative impact is addressed throughout this report.

Visual Impacts

- 11.39 To aid the assessment of the impact on mid to long range views the applicant has submitted verified views from eight locations, found in Appendix B of the Design

and Access statement. The existing Holmesdale Road stand forms a prominent part in the majority of these views, being of a notably taller and larger scale than the two to three storey buildings that predominantly surrounds it. From the north (see views 1 and 3 within the applicant's assessment) and from the corner of Holmesdale Road and Park Road to the west (see view 5), where land levels are higher and/or the Holmesdale Road stand occupies the foreground, the proposed stand's pitch side roof is lower than that of the peak height of the Holmesdale Road stand. It reads as continuation of the Holmesdale Road stand's massing. Similarly in views directly to the south (see view 7 and view 8) where the southern flank elevation of Holmesdale Road stand is clearly visible and the proposed stand's southern wing and roof form sits below the height of the Holmesdale Road stand's roof height, a smooth successful transition in scale is achieved.



Fig 7 – View 3. Junction of Whitehorse Lane meets Park Road

11.40 In views to the southeast and east of the main stand (see views 2, 10 and 12) the proposed main stand would be prominent due to increased height of the car park facing façade, and with the Holmesdale Road stand no longer providing the same visual anchor point. In these views the building takes on the role of forming a landmark, a role appropriate to take given its national, regional and local importance, with the latter underpinned by policy DM20 of the Croydon Local Plan (2018). The proposed development would positively contribute to skyline, adding identity and character through its exemplar design and use, which will positively contribute to townscape legibility.



Fig 8 – From Whitehorse Lane outside petrol station

Form

- 11.41 The proposed main stand is a logical response to the club’s need to enhance facilities and capacity for its supporters, and the constraints of the site, including surrounding neighbouring properties and commercial businesses. The rationale of the form was notably accepted as an appropriate response by the Place Review Panel.
- 11.42 The shape and arrangement on site of the expanded “Main Stand” is underwritten by an architectural concept (namely the curved bowl profile), which provides a massing response needed to mitigate the impact of the proposal on adjacent properties in the more sensitive north-west and south-west corners. The height of the proposed “Main Stand” would rise towards the centre of the mass, at which point the stand would project into the current open-air car park. Thereafter, the building mass would reduce in height and would curve away from neighbouring residential properties. The curved design and positioning of height helps mitigate the visual effects of the development. The form, proportion and scale would help to ensure the loss of housing and impact on remaining housing is minimised.

Elevational Treatment

- 11.43 The Club has its origins at the original “Crystal Palace” – a huge glasshouse on a metal frame that was constructed for the Great Exhibition of 1851. The design of the new “Main Stand” draws on inspiration from this historical connection. The proposed facade reflects certain elements of both the original “Crystal Palace” building along with the Club’s Eagle crest. The cladding wings are reminiscent of the Crystal Palace Football Club’s ‘Eagle’ motif and provide a strong iconography and conceal internal staircases and service ducts. Whilst, the glazing and structural module has been developed, taking a cue to Paxton’s defining grid that was found in the “Crystal Palace” at 8ft (approx.2.5m). This forms the vertical glazing lines in the upper façade. Further reference to Paxton’s formative module size is seen in a fritted pattern applied to the main accommodation levels within

the feature lines. The Crystal Palace and eagle wings motifs have been developed to create an integrated and successful form, helping to create a strong place specific narrative with coherent overall design.



Fig 9 – Façade of the Proposed Main Stand.

- 11.44 Brickwork masonry elements are proposed at a low level, reflecting the building’s suburban, residential context and providing an appropriate human scale at street level. The overall façade design creates a distinctive high-quality development. Given the scale of the proposal in relation to surrounding residential development, it is essential that excellent design quality is delivered (as required by CLP 2018 policy DM10.7). Conditions are recommended to ensure that the actual materials to be used in the façade of the finished building deliver the excellence expected.
- 11.45 The overall façade design creates a distinctive high-quality development. Given the scale of the proposal in relation to surrounding residential development, it is essential that excellent design quality is delivered. Conditions are recommended (alongside the S106 “architect retention” clause) to ensure that the actual materials to be used in the façade of the finished building deliver the excellence expected.

Landscaping, including Public Realm and Fan-zone/plaza

- 11.46 There would be small area of public realm created on Holmesdale Road that sits between the road and the stadium secure line where the security hut is located. This would provide an opportunity for additional tree planting and publicly accessible short term cycle parking (except where operational safety and practical restricts), as well as additional space to allow fans to enter and exit the stadium in a safe manner. The proposed development would make a small and welcome contribution to the public realm.
- 11.47 The design proposed includes a fan pedestrian piazza outside and opposite the centre of the “Main Stand”. This would be a characterful space with the intention to provide a mix-mode usage for match-day events and would also include parking on non-match-days, as well as an opportunity to showcase views from within the ground of the proposed main stand.

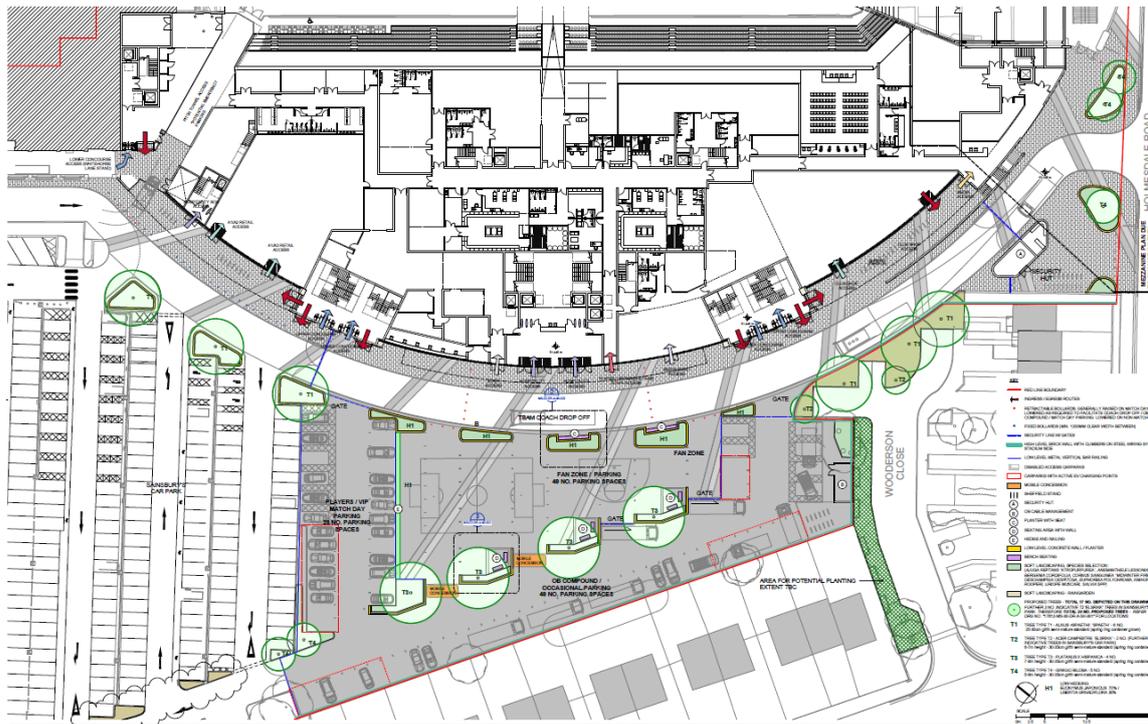


Fig 10 – Landscaping Plan

11.48 A simple and robust solution is proposed to identify differing landscape areas and functions within the external landscaped areas including public realm. Different floor finishes identify the outer concourse, pedestrian walkways, car park access roads and parking bays. Feature markings radiating out from the curved stadium form help to visually unite the separate spaces. The integration of street furniture, signage and lighting has been considered, taking reference from the materials used and responding to the need for robust and distinctive solutions. Benches are proposed in concrete and a number of these would also have timber seats, with arm and backrests. Subject to conditions and section 106/278 legal agreements to ensure the final detailed materials/landscaping are appropriate, officers are supportive of the proposals.

Heritage

11.49 Officers consider that there is no harm to the setting of any listed building, or to the character and appearance of any Conservation Area. The structural remains of the 1924 Main stand are considered to be of local archaeological and historic interest. A condition is recommended to ensure these are appropriately recorded.

Urban Greening Factor

11.50 London Plan Policy G5 'Urban Greening' states that major development proposals should contribute to the greening of London by including urban greening. Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. This is a method of quantifying how much urban greening is provided, and is a calculation based on the amount of "green cover" and how valuable that green cover is (so, for example, woodland has a higher urban greening value than

regularly mown lawn). In the interim, the Mayor recommends a target score of 0.3 for predominately commercial development.

- 11.51 The site achieves an UGF score of 0.116. If areas proposed to be changed in Wooderson Close but which lie outside of the red line, are included then this increases to at least 0.118.
- 11.52 Officers have worked with the applicant to ensure that urban greening opportunities in the context of the current application have been robustly explored. Through revisions secured during the application, the Urban Greening Factor has increased by 16%, from 0.100 to 0.116. The club state that safety and security, operational requirements of both the club and Sainsburys, and need to respect land interests are the key restraints that prevent this being increased further. Although some caution should be applied to the weight these statements are given, as this has not been confirmed either way directly by Sainsbury's.
- 11.53 The red line site area for which the UGF is calculated from, is an expansive area that includes all three of the existing stands. The existing stands, with exception of small open area at the corner of Arthur Wait and Holmesdale Road score 0, thereby to some extent skewing the score, and much of the site is covered by hardstanding, stands, or the football pitch itself. To increase the score that these areas achieve would require substantial intervention that would be disproportionately costly, and unreasonable to insist on, as well as there being potentially other disadvantages and unintended consequences of carrying out (disruption/carbon lifecycle etc). The pitch value score can also not be increased without impacting its function. 73% of the site area scores 0 in the proposed scenario. There are clearly significant site restraints, with the policy making no differentiation between an already heavily built over site where the majority of buildings/land staying in the same form/use and a previously undeveloped or completely redeveloped area land where there are significant more opportunities/less restraints to reconfigure and maximise. In this context the applicant's Urban Greening contribution is reasonable. In officers' view, the UGF score achieved demonstrates an improvement in urban greening compared with the existing situation, and on that basis would contribute to the aims of London Plan Policy G5. On that basis the UGF is considered acceptable.

Trees

- 11.54 In total one category A tree, four category B trees, eight category c trees, and four groups of category C trees are proposed to be lost. Five more trees are being retained than when this application was previously considered by committee in 2019. In the intervening period one of the trees (currently labelled T4) that scheduled to be lost, has been upgraded from a category B to category A.
- 11.55 The location of the category A (T4) and B (T1, T2, T3 and T27) trees to be lost are shown in fig X below. Any meaningful expansion of the stand would necessitate the removal of trees T2, T3 and T4. T1 and T27 are needing to be

removed to provide safe and secure access/egress. The loss of these trees is unfortunate but justified.

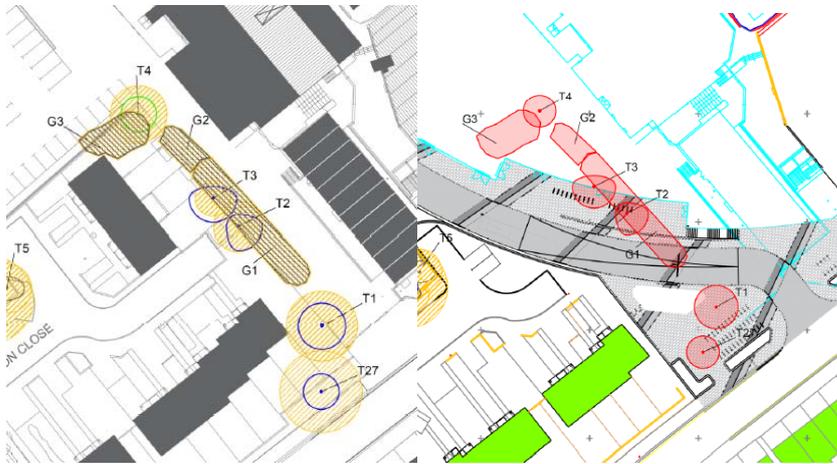


Fig 11 – Left – Trees existing location Right – Trees location in context of the development.

11.56 14 semi-mature trees are proposed to be planted on site, with the applicant proposing to plant a further five trees in Wooderson Close as part of the S278 Highways Agreement. The species of trees proposed that includes Acer Campestre, Maple lead London Plane trees and Gingko biloba are appropriate. There would be a net loss of trees, with the actual deficit dependant on the number of actual trees contained within the 4 groups of trees that are due to be lost. The reasons put forward for not achieving net gain in trees as normally sought is the same that apply to Urban Greening Factor score as set out in para 11.51.

11.57 According to the applicant's CAVAT (Capital Asset Value for Amenity Trees) values the existing trees that would be lost have a value of £144k, with the estimated proposed tree value after 15 to 20 years of maturity, estimated to be £244k. Three trees are proposed to be planted on Holmesdale Road, in line with the NPPF (2021) that requires consideration to be given to creating tree lined streets. The development's impact on trees, subject to conditions/S278 agreements, is acceptable.

Ancillary Elements

11.58 Internal changes to the Whitehorse Lane Stand are proposed to facilitate the lengthening of the pitch and to improve disabled access. A new corner infill stand between the Arthur Wait Stand and the Holmesdale Road Stand is proposed. These changes would not be widely visible from any public vantage point and are in keeping with the character of the existing stadium. They would preserve the appearance of the site and surrounding area.

11.59 While it is noted that there are no proposals for mobile phone masts and the like, it is likely (given the additional capacity the expanded "Main Stand" would

facilitate) that some additional telecommunication equipment might be required. The visual impact of such equipment, if not suitably designed and/or screened, could well be harmful to the appearance of the development. As such, a condition is recommended to be imposed on any consent granted requiring the details of any telecommunication equipment visible from the public realm on the stand to be approved by the Council, prior to installation.

- 11.60 Site security would be achieved via lockable perimeter security gates along both the northern boundary (with Sainsbury's car park) and the southern boundary (to Holmesdale Road). The Metropolitan Police have requested further information in relation to gates and as such, a condition is recommended to ensure this detail is agreed by the local planning authority and the Metropolitan Police at the detailed design stage.

Public Art

- 11.61 Policy DM14 of Croydon Local Plan (2018) relates to public art and requires all major schemes to include public art as an integral part of the design, enhancing local distinctiveness and reinforcing a sense of place. The "Main Stand" seeks an iconic design response and with the integrated historic and emblematic references, officers consider in this unique instance the design fulfils the criteria of policy DM14.

Public Access

- 11.62 London Plan (2021) Policy D9 Part D states that free to enter publicly-accessible areas should be incorporated into tall buildings where appropriate, particularly within more prominent tall buildings where they should normally be located at the top of the building to afford wider views across London. Croydon Local Plan (2018) policy DM15 requires tall and large building developments, including those taller than 40 storeys, to incorporate amenity space, whether at ground level such as atria, or above ground level, such as sky gardens and roof terraces, that is accessible to the public.
- 11.63 No fully publicly accessible areas within the building are proposed. The applicant has stated that they feel such provision would not make best use of the site as a football stadium, and that such provision would pose security and safety risks. The applicant has highlighted the provision of semi-public areas in the form of external fan-zones on match days, as well as provision of area within the stand for Palace for Life foundation and other local community organisation on non-match and non-large event days. On balance this is not considered by officers to warrant refusal. In addition, as there is no public accessible areas, the non-provision of public toilets is acceptable, and the proposal does not conflict with London Plan (2021) policy S6 'Public toilets'

Impact on Neighbouring Occupiers

11.64 London Plan (2021) Policy D9 requires consideration to be given to daylight and sunlight penetration around tall buildings. London Plan (2021) Policy D6 'Housing quality and standards' requires the design of developments to provide sufficient daylight and sunlight to surrounding housing that is appropriate for its context. Policy DM10.6 of Croydon Local Plan (2018) seeks to ensure the amenity of the occupiers of adjoining buildings are protected; noting that the development should not result in any unacceptable loss of privacy, sunlight or daylight.

Sunlight and Daylight

11.65 The application was accompanied by a Daylight/Sunlight Report which provides an assessment of the potential impact of the development on sunlight, daylight and overshadowing to neighbouring residential properties based on the approach set out in the Building Research Establishment's (BRE) 'Site Layout Planning for Daylight and Sunlight: A Good Practice Guide'. See Appendix 2 for BRE sunlight and daylight definitions. It should be noted that the assessment produced was carried out in line with previous BRE guidance. This guidance was updated this year, with new tests introduced, however test in relation to impact on neighbouring properties (VSC and NSL) remain the same.

11.66 The applicant's assessment considers the impact on the existing residential units in Wooderson Close, Holmesdale Road and Clifton Road. The assessment examined 179 neighbouring windows and concluded that with the proposed development in place, the majority of the windows to the existing buildings surrounding the site would continue to receive adequate daylight as defined by the BRE guidance.

11.67 The one property that would be most impacted by the development would be 20 Wooderson Close. The layout of this property of the windows facing the development (NNW) is understood at present to be a kitchen at ground, two single bedrooms, one at first and one at second floor level. All windows to this property would fail the standard BRE daylight tests.



Fig 12 – Window Layout of no.20 Wooderson Close

- 11.68 In VSC terms, the kitchen at ground floor level only marginally fails, experiencing a VSC reduction of 20.82%, against target of 20%, retaining an overall VSC of 20.48. The bedroom at first floor level passes the VSC test. The bedroom at second floor level, although its VSC would be reduced by 28.46%, would still retain a VSC value of 19.61%. In terms of daylight distribution (NSL), the ground floor kitchen would see a 33% reduction. The first floor bedroom would experience a 33.26% reduction and the bedroom at second floor level a 40% reduction.
- 11.69 No.20 is a dual aspect property, with several windows facing toward Holmesdale Road. These windows serve a lounge/dining area and bedrooms, and would continue to receive good levels of sunlight and daylight.
- 11.70 Overall, the impact of the development on no.20's light is acceptable, as all windows facing the development within no.20 would retain a VSC of more than 19.5%, which considered to be good level of daylight for a property in this sort of context, and the property also benefits from another aspect.
- 11.71 Notwithstanding the above conclusion, the applicant has indicated they would be willing to pay for the provision of additional windows in the newly exposed flank elevation of no.20, which is owned by the Council, to help mitigate the impact in terms of the loss of light as far as possible. A condition is recommended requiring full details of the design and location of new windows to be approved and installed.
- 11.72 It is noted that there are some BRE failures to 12 Wooderson Close, 16 Wooderson Close and 18 Wooderson Close. However these are all minor, with these properties still retaining VSC of over 20. There are some minor BRE transgressions to 80 to 94 Clifton Road. However, all these properties will still retain a VSC in excess of 23%

Overlooking and Privacy

- 11.73 The most south-westerly part of the proposed stand would be set back from the nearest residential property (20 Wooderson Close) by approximately 21m and this closest point would be at oblique angle. It is noted that no.20's outlook is currently limited by the flank elevation of no.26 Wooderson Close. The development would not result in an unacceptable loss of outlook to this property.
- 11.74 The size, bulk and scale of the new "Main Stand" is such that it would have a more imposing appearance when viewed from Wooderson Close, particularly those properties located closest to the stand. All these dwellings are dual aspect, with several habitable rooms facing the opposite direction (south-east) away from the site and towards Holmesdale Road. Taking account of the dual aspect nature of the dwellings, the separation distances between the houses and the proposed "Main Stand" and that the tallest element of the proposed development would be

positioned approximately 80m from these houses, the effect of the development on outlook experienced by immediate neighbours would be acceptable.

- 11.75 The impact on outlook from dwellings along Clifton Road would be acceptable given the separation distance to the new stand would be at least 40m.
- 11.76 Concern has been raised from properties in Clifton Road about overlooking from terrace area, however these properties gardens are located at least 40m away from the development and as such their privacy would not be unacceptably eroded. The impact on privacy from windows and terrace areas from the development is acceptable.
- 11.77 A 3m high acoustic fence as measured from stadium side would be installed along the boundary. Whilst the boundary is at least 1m higher than allowed under permitted development, this would generally, with exception of no.20, be located along the rear boundary of these properties, where it would have limited impact on light/outlook. In no.20 Wooderson Close case the boundary would be 3.15m on the neighbour's side due to the land levels. The benefits of the acoustic fence would outweigh the impact that it would have on light and outlook.
- 11.78 Concerns have been raised that visiting supporters waiting in coaches are able to look into nearby residential dwellings, and that this may increase due to the development's increased capacity. The issue only arises on match-days and for a limited time, being either before spectators disembark (to watch a match) or following a game when they board a bus but before it leaves. Given the infrequency of the issue and taking account of the benefit in locating away-supporter coaches close to the away fan seating (which assists with crowd control), and given that this impact's street facing windows that generally experience poorer privacy conditions, it would be unreasonable to refuse planning permission on this basis.

Noise

- 11.79 The main sources of noise are from the Stadium and from fans entering/leaving the stadium, particularly in the immediate periods before kick-off and after the game on match days and large event days. Although road closure measures around the stadium do reduce traffic noise, thereby creating periods of quieter times even on match days.
- 11.80 The proposed design of the stadium helps mitigate the noise impact to some extent, with the roof and filling in the corners directing sound onto the pitch, although the increased height may allow for some sound breakout. The public address and voice alarm systems will be designed to ensure no additional impact. A 3m high acoustic fence on the boundary with adjacent residences to further help mitigate noise impact is proposed. Traffic noise would also be mitigated through series of measures as set out in transport section of this report.

11.81 An appropriate balance needs to be struck between supporting Crystal Palace Football Club expansion, given the significant economic, social and cultural benefits that the club make to the area as recognised by DM20, and considering the impacts of the development. This is especially relevant as many of the issues are pre-existing and historic, and common with any facility that draws people to an area. At present the use of the stadium is relatively uncontrolled by planning restrictions, a series of conditions are recommended to be imposed to ensure only one professional club and affiliated teams play at the stadium (which prevents ground sharing with another club as has occurred in the past), restrictions on the number of large non match day events that can take place at the stadium and impose hour restrictions on the use of the proposed main stand internal spaces. This will ensure long term protection that events that cause disruption are reasonably infrequent, thereby striking a reasonable balance.

Transport, Access and Parking

11.82 The NPPF (2021) seeks to promote sustainable transport and that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe. London Plan (2021) policy T4 'Assessing and mitigating transport impacts' requires development proposals impact on the capacity of the transport network to be fully assessed. London Plan (2021) policy T2 'Healthy Streets' requires development to promote and demonstrate commitment to Mayor's Healthy Streets Approach, which reduces dominance of car use, whilst promoting sustainable modes of transport. Croydon Local Plan (2018) Policy SP8.6 advises that the Council and its partners will improve conditions for walking and will enhance the pedestrian experience the enhancing footpaths, decluttering the streetscape and enabling widening of footways where feasible on over-crowded routes. Policy SP8.7 further advises that the Council and its partners will provide new and improved cycle infrastructure by enhancing and expanding the cycle network along with the creation of new routes to improve connectivity between sites. In terms of car parking, Policy SP8.15 seeks to limit parking spaces in the borough and aim to reduce the overall amount of surplus and outside high Public Transport Access Level (PTAL) areas, the Council will apply standards set out in the London Plan (2021). Policy SP8.9 enables the delivery of electric vehicle charging infrastructure and requires development to provide electric charging infrastructure car clubs and car sharing schemes. Policy SP8.4 requires major development proposals to be supported by transport assessments, travel plans. Construction Logistic Plans and Delivery/Serviceing Plans.

Modal Surveys

11.83 The applicant undertook travel surveys prior to submission of the application of home supporters and staff to understand how people travel to the site. The most popular mode of transport was travelling by car or train. The results of the survey are set out below:

Mode	General admission		Corporate/hospitality	
	Weekend %	Weekday %	Weekend %	Weekday%
Car as driver	33	37	43	20
Car as passenger	11	12	10	0
Train	41	41	39	60
Bus	5	4	4	0
Taxi	1	1	3	20
Walk	6	5	2	0
Bicycle	0	0	1	0
Motorcycle	0	0	0	0
Coach	1	0	0	0

Fig 13 – Modal Split

11.84 The survey identified that for the general admission supporters, of those that drove to the site, 78% parked on street on a weekend, increasing to 85% on a weekday. At weekends Norwood Junction was the most used train station to alight from at 55%, followed by Selhurst at 25% and Thornton Heath at 10%. For week-day matches, Norwood Junction was the most used at 46% with Selhurst and Thornton Heath, at 36% and 8% respectively.

Traffic Impacts

11.85 Junctions around the ground as observed in the Transport Assessment (TA) are at capacity before and after matches. It is reasonable to conclude that there is a direct relationship between the extent of the issue, and the large number of people that travelling to the ground by car. If existing trends were to continue, then increasing the capacity of the ground could lead to a significant increase in number of people travelling to the ground by car, which in turn would increase the number of junctions operating above capacity, resulting in increased traffic congestion in the local area, and increased journey times. This would have negative impacts on amenity, air quality, efficiency of sustainable modes of transport for example buses, decline in quality of pedestrian environment and movement of goods.

11.86 There is currently little substantive planning control over how access arrangements and car parking pressures are managed, with arrangements managed in a more ad hoc basis. The transport measures put forward and recommended to be secured by condition and S106 legal agreement look to not only influence the journey travel choices of the additional supporters, but to also impact on the travel choices of existing supporters. There is a potential that the proposal could form a catalyst that results in an improvement from the existing situation. A series of both incentive and restrictive measures are proposed to try and achieve this, which would also promote sustainable modes of transport, which have a broad range of environmental and social benefits. Many of these benefits would extend beyond match day, potentially resulting in a much broader improvement. The list of measures put forward are summarised below and are be considered in more depth in the respective sections of this report.

- A CPZ consultation (£100,000) with money secured to implement the CPZ (£230,000) if required. Operational and enforcement practical requirements would mean that in all likelihood this will need to be both a match and non-match day CPZ.
- A travel plan which amongst it measures targets a 5% year on year reduction of single occupancy car journeys from the baseline travel plan survey for the first five years (so totalling a 25% reduction). Failure to achieve these targets would result in a financial penalty of up to £250,000. This would be spent on pedestrian and cycle improvements.
- £100,000 for cycle route improvements.
- £30,500 for a wayfinding strategy, including signage.
- £15,770 for bus stop/shelter improvements.
- £15,000 for station management plans.
- Provision of 100 cycle parking spaces.
- Management of car park.
- Increased pre and post-game on site offer to encourage greater spread in arrival and departure times reducing the peak impact.

Junction Operation

11.87 The junctions of South Norwood Hill/Whitehorse Lane and South Norwood Hill/High Street have been identified as being over operational capacity during match days. To prevent the worsening of the situation the council and the applicant will work together to continue to monitor the situation. If the situation has worsened, then the club would provide traffic management stewards to ensure effective junction operation. This is welcomed and a planning obligation is recommended to secure this

Public Transport

11.88 The TA provides an assessment of bus and rail occupancy and capacity on matchdays. Few of the trains were identified as having 100% occupancy. Access to trains is managed by station staff after the match in order to prevent crowding on platforms and to manage the flow of spectators seeking to board trains.

11.89 Queueing occurs at Selhurst and Norwood Junction stations post-match. The TA states that the queueing is governed to a certain extent by station management practices, which ensure that platforms are not overcrowded, seeking to limit associated risks. Management of queueing can be assisted by increasing the area for waiting spectators at Thornton Heath and Norwood Junction stations. There are no options for such an arrangement at Selhurst Station.

11.90 To provide an increased area at Thornton Heath and Norwood Junction stations a small section of highway would need to be closed to vehicle traffic. This would be secured through a Traffic Management Order (TMO). For Thornton Heath Station, a layby on the High Street could be potentially closed. At Norwood Junction, as access would need to be maintained for residents and businesses,

this would require management of a closure and advance notice given of future matches, which requires further investigation and consideration of options. The investigation of options and delivery of a scheme is recommended to be captured through the S106 Legal Agreement.

11.91 Further assessment of the impact of additional fans using trains to get to and from the fixtures (particularly on Norwood Junction Station) is required, given the length of queues and the area affected. A station management plan is required for each of the three rail stations. This is recommended to be secured by a planning obligation.

11.92 Bus occupancy surveys were carried out before and after the Saturday and weekday matches. No issues were observed and given the relatively low numbers of people using buses to get to the ground [about 5%] it is reasonable to assume bus capacity is unlikely to be a significant issue, even with the increase in ground capacity.

Pedestrian and Cycle Environment

11.93 The applicant's submission identified the following specific issues – for pedestrians and cyclists:

- There is a lack of effective width on the south side of Whitehorse Lane close to the ground and on Selhurst Road and Station Road (caused by a stall holder using part of the footway) and Thornton Heath High St (caused by stalls trading on the footway) and on a section of Holmesdale Road
- A lack of crossing facilities on Whitehorse Lane
- Lack of signage to direct spectators to the ground from the three rail stations
- A lack of bus shelters at stops on Whitehorse Lane close to the ground
- Current drainage issue at a number of junctions in the study area
- Lack of colour contrast, dropped kerbs and tactile paving at some key crossing points on the more residential local streets

11.94 Improving the quality of the pedestrian environment would encourage more people to access the site on foot, especially from the three neighbouring stations. Given the imperative to change the existing modal patterns (away from car use), contributions are recommended to be secured via S106 legal agreement to fund the above works.

11.95 Transport for London (TfL) have sought a Pedestrian Comfort Level (PCL) Assessment to understand what is achievable to make the pedestrian environment more attractive and safe, thereby enhancing the pedestrian experience. A PCL assessment is recommended to be secured via S106 agreement, with any unspent money from carrying out that assessment, as well as any money collected if the applicant fails to meet travel plan single occupancy car journey targets, used to fund implementation.

- 11.96 Cycling to and from the stadium should be promoted as a viable alternative to travelling by car. To date, no assessment as to the quality of existing cycle routes has been undertaken as part of this application. The Council had previously commissioned a study to consider enhancements to “Quietway” cycle routes in the borough and this identified specific issues at two locations close to the stadium which failed the “Cycling Level of Service Assessment” [CLoS]. These were the Southern Avenue to Holmesdale Road via South Norwood Hill and Lancaster Avenue to Sunny Bank junction, although some progress has been made on improving these via Experimental Traffic Regulation Order.
- 11.97 Providing a better environment for cyclists would likely encourage greater use. It is noted that TfL and the GLA have requested improvements to cycle routes and given the imperative to change the existing modal patterns (away from car use) contributions are recommended (secured within the S106 agreement) to fund works in connection with this.

Off-site Parking

- 11.98 A Saturday parking beat survey was previously undertaken on home match day prior to the submission. Both Selhurst and Thornton Heath stations were closed when the survey was undertaken. As such the survey represents the worst case scenario as there was increased likelihood of more supporters arriving by car. The beat survey was based on a selection of 58 roads spread across an area within a 1.5km of the ground (considered a wide enough area to capture most of the likely impact on on-street parking).
- 11.99 The survey shows that roads close to the ground have very high parking stress, with an occupancy level of 83/85% or more. This aligns with travel surveys that show a large number of people arriving to the ground by car. The introduction of CPZ, that would need to go through separate public consultation and agreement process, would ensure that parking stress could be managed and car journeys disincentivised. There is likely to be an increased parking enforcement presence in the area as a result. This could aid issues identified in objections, such as cars parking illegally in front of people’s driveways. The benefits of CPZ are likely to extend beyond match day, and therefore encourage a wider modal shift. This is a significant benefit of the proposed development.

Car and Cycle Parking on Site

- 11.100 There is no existing disabled parking within the Club’s car park and sixteen disabled parking bays within Sainsbury’s car park. An additional twelve disabled parking bays are proposed for the Club’s car park. This additional provision would mean that 6% of all bays, and 9.5% of bays within the Club’s car park would be disabled parking spaces. Table 10.6 of the London Plan (2021) sets out disabled parking standards for non-residential developments. It has no set standard for this type of development, with the two closest categories being leisure (that requires 6% of designated bays, and 4% enlarged bays) and Sports Facilities (that refers to Sport England Guidance and specifies a 5% provision). In this

instance, the proposed disabled parking provision is a significant improvement over the current scenario, the level of proposed provision is close to 10%, and as such is acceptable.

11.101 London Plan (2021) Policy T6 'Car Parking' states car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport.

11.102 The reduction on site car parking from 553 existing parking spaces to 479 parking spaces is supported as it would further encourage modal shift and sustainable modes of transport. The potential adverse impact from cars being displaced onto surrounding street would be appropriately mitigated in the range of measure outlined, including potential implementation of a CPZ. There will be a considerable increase in provision of on site (passive and active) electric vehicle charging points (EVCP), with 25 active (20% of club car park), and the rest of spaces in the club's car park installed with passive provision. There is no set standard for this form of development within the London Plan (2021), with Policy T6.4 being for leisure uses, the closest standard that requires all car parking space to be provided with electric infrastructure. Policy T6.4 does not define percentages that should be provided at the proposed development, however the GLA have confirmed they are happy with the extent of electric vehicle charging provision. In accordance with Croydon Local Plan Policy SP8.13, a Car club is recommended to be secured through the Section 106 legal agreement. The use of the car club would be aimed at staff (who may be able to avoid bringing their car to work if a club car is available for use), but also likely to be available to members of the public. This is a benefit which helps reduce parking stress and justify the loss of on-site car parking.

11.103 There is currently no formal management of the on-site car parking arrangements for match-days. The GLA and the Metropolitan Police consider that car parking should be more tightly controlled to ensure car park users are legitimate with the associated benefits of improved site security and better management generally. Measures are proposed to alter access arrangements into the car park (at selected times on match-days) to better separate pedestrians and vehicles. This includes the clearance of the Sainsbury's car park approximately 3 hours before the home fixture, which would be no longer available to the public. It is proposed that the access points would be altered so that the existing access into the site becomes fully pedestrianised until approximately 1 hour after the match. Subject to a condition to require a Car Park Design and Management Plan (which is recommended) to clearly set out the detailed arrangements (for approval by the local planning authority) these arrangements are supported.

11.104 Currently, there is no cycle parking provision at the stadium or at the Sainsbury's store. The scheme proposes 100 Sheffield stands which will provide for 200 cycle parking spaces and is based on estimated cycle demand from the current mode split. This provision is on the basis of the whole stadium rather than

the expanded “Main Stand”. This is acceptable. The cycle stands would be located at the Holmesdale Road access, within the club’s car park and near the proposed “Main Stand” museum entrance.

Coach Parking

11.105 Existing away supporters generate 6-8 coaches on a match-day. With expansion of the ground, demand for another 2 coaches is likely to be generated. Currently, coaches park on Park Road (once it is closed to general traffic) adjacent to the “Arthur Wait Stand” where the away supporters are accommodated. Therefore, there is some logic to allow coaches to continue to park within the street, notwithstanding the short-term impact experienced by local residents.

11.106 TfL has raised concern that this is not an ideal location in terms of visual intrusion and air quality for local residents on Park Road. However, there are concerns that away fans would have a greater likelihood of interacting with home supporters if they are moved away from the “Arthur Wait Stand” after a match (to a coach maybe waiting in the Sainsbury’s car park). From a crowd control perspective, it is considered preferable for coaches to be parked close to gate from which away fans will exit. TfL have asked for further options to be explored both on site and off site in regards to provision and parking of coaches for fans. This is recommended to be secured through S106 legal agreement.

Travel Plan

11.107 The application is accompanied by a Framework Travel Plan, which has been reviewed by the Council’s highway officer and TfL. The review identified a number of shortcomings including a need to improve the Travel Plan targets generally and the Club’s overall ambition to reduce reliance on the private car and to respond positively to associated congestion at junctions, on street car parking pressures and pedestrian safety concerns, as well as provision to increase cycle parking in the future. The targets detailed by the Travel Plan should reflect the local nature of the support and reflect good practice. In addition, targets should be set for reducing car use by away supporters.

11.108 The issues identified with the travel plan as submitted, means that it cannot be approved in its current form. A new travel plan is recommended to be secured through a S106 legal agreement. This would include the payment of a bond (which would be refunded if the travel plan targets set are achieved). If targets are not met, the bond would need to be used by the council on cycling and walking improvements.

Access, Servicing and Construction Logistics

11.109 The current vehicle and pedestrian access to the “Main Stand” is from Whitehorse Lane. This would remain largely unaffected by the proposals (apart from temporary changes during match-days). There is a further vehicle and pedestrian access via Holmesdale Road. This access will be amended to allow

access to the revised Crystal Palace Football Club car park and match-day plaza. The detailed design and construction of the amendment would need to be secured by use of a S.278 agreement.

11.110 The proposal includes an amendment to the layout of and parking spaces within Wooderson Close to facilitate the amended access onto Holmesdale Road, as well as to reutilise redundant pavement on Wooderson Close. These changes to the highway would need to be secured through the S.278. In addition, as the road would be shortened this should be stopped up under S.247 of TCPA.

11.111 Deliveries are currently carried out on street from Holmesdale Road and on the access road into club's car-park off Holmesdale Road. The TA estimates an additional 14 deliveries per week would be needed for the expanded Main Stand, using up to 10m rigid vehicles. Little information has been provided to allow a detailed understanding of exactly how deliveries and servicing of the site might occur. The TA notes that due to the limited width of the access road, deliveries may temporarily block the main access road that runs adjacent to the Main Stand (it is not clear whether this would cause any unacceptable impact).

11.112 To ensure that delivery and servicing proposals are workable and would not result in any unacceptable harm, a condition is recommended requiring a detailed Servicing and Delivery Plan to be submitted and approved in writing by the local planning authority before occupation of the proposed "Main Stand".

11.113 An outline Construction Logistics Plan (CLP) has been included in the TA, which provides a helpful initial indication of how construction logistics could be approached. A more comprehensive CLP would need to be submitted once more is known about the construction dynamics and this will be secured by way of a condition discharge application – which should also include details of the demolition of existing structures (including Wooderson Close properties).

Refuse and Recycling

11.114 The applicant initially advised that all waste would be compacted before being taken away to landfill. The proposals were considered by the Council's Waste and Recycling officer who raised objection to the absence of any recycling proposals. The applicant was requested to reconsider the approach to recycling and in response, has advised that it intends to recycle and has accepted the inclusion of a pre-occupation condition requiring a stadium-wide refuse strategy (including the appointment of a club refuse champion and for recycling to be separated from any non-recyclable refuse on-site).

11.115 Croydon Local Plan (2018) policy DM13.2 requires a waste management plan for major development. Subject to a condition being imposed on any consent requiring a detailed site waste management plan, to include details of how recycling is to be separated from landfill refuse on-site, no objection is raised.

11.116 The public consultation has highlighted the fact that there is a considerable amount of litter left in the wider area by spectators before and after a match, and that the proposal could make this worse. A planning obligation is required to secure off site litter collection on match-days on surrounding roads and key routes to train station to address the issue.

Environmental Effects

Contamination

11.117 Policy DM24 of Croydon Local Plan (2018) sets out detailed requirements for ensuring sites are properly investigated and any contamination identified appropriately remediated and allows for remediation to be secured via an appropriate planning condition.

11.118 A geo-environmental desk study was submitted alongside the application which indicated that there may be potential soil contamination risks, mainly associated with made ground; the content of which is unknown and activities such as pilling could allow contaminants to spread into previously uncontaminated areas (for example potential hydrocarbons associated with underground fuel tanks – linked to the petrol filling station along with possible unexploded ordnance).

11.119 The report recommends that an intrusive site investigation is carried out and a strategy would then be put in place to appropriately remediate any contamination found. This would be secured by way of a condition imposed on any consent. The Environment Agency has also requested a series of conditions be imposed on any consent to prevent contamination of controlled waters.

Air Pollution, Noise and Vibration

11.120 Chapter 15 of the NPPF states that when determining planning applications, local planning authorities to prevent new and existing development from contribution to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability.

11.121 London Plan (2021) policy SI 1 'Improving air quality' requires development to be 'air quality neutral' and not lead to further deterioration of existing poor air quality, such as areas designated as Air Quality Management Areas (AQMA). The whole of Croydon has been designated as an AQMA.

11.122 Policy DM23 of Croydon Local Plan (2018) seeks to ensure that future development that may be liable to cause or be affected by pollution through air, noise, dust, or vibration, will not be detrimental to the health, safety and amenity of users of the site or surrounding land.

11.123 The application was accompanied by an Air Quality Assessment which provided an assessment of the key effects associated with the construction and

operation of the proposed development. During the construction phase, the proposed development could potentially introduce new emission sources in the form of construction traffic and construction plant and involve potentially dust generating activities. Concerns have been raised by neighbours in relation to the potential for construction impacts to adversely affect amenity. Conditions would need to be imposed on any consent granted to require the applicant to submit a Construction Logistics Plan and Construction Environmental Management Plan setting out how the site will be managed to prevent migration of dust and pollutants from the construction site.

11.124 Non-Road Mobile machinery (NRMM) (e.g. diggers, pumps and construction machinery etc) on construction sites is responsible for 7% of NOx emissions in London and the Council requires all NRMM to meet with legislation to limit emissions from these sources with the applicant needing to commit legislative compliance as part of the Construction Environmental Management Plan.

11.125 A modelling exercise has been undertaken to assess the likely contribution from additional traffic to air pollution. The model has demonstrated that changes in pollutant concentrations would be 'negligible', subject to adherence to the measures identified in the Air Quality Assessment.

11.126 The applicant has confirmed that there would be no boilers would be used in the operation of the development, with all heating requirements achieved through the use of Air Source Heat Pumps. This revision ensures that the development aligns with the GLA's latest air quality guidance. The proposed development is considered to be air quality neutral in regards to building and transport emissions. The GLA have also confirmed that the scheme does not need to undertake an air quality positive approach.

11.127 A S106 contribution is to be secured to mitigate the wider residual impacts on air quality.

11.128 It is recommended that compliance with the report and details of any plant and machinery be secured by condition.

11.129 The application is accompanied by a noise assessment which was referred to the Council's noise advisor, who has confirmed that full details of construction methodologies and programme have yet to be made available. Quantitative predictions of construction noise levels have not therefore been carried out and confirmed by the applicant. Consequently, a condition is required to be imposed to secure noise control measures related to construction noise and vibration (in line with BS 5228 Code of Practice for Noise and Vibration Control on Construction and Open Sites).

11.130 The applicant accepts that control measures related to construction noise and vibration will need to be set out within the Construction Environmental

Management Plan (CEMP). The applicant has stated that in view of the close proximity of the site to neighbouring residential properties, augered piling will be used in preference to percussive or vibratory methodologies. This will also be secured through the imposition of a planning condition.

- 11.131 In terms of operational requirements, the updated energy statement confirms that no boilers will be used, with all heating including for hot water generation being generated through Air Source Heat Pumps, meeting the requirements of London Plan policy SL1 (B) (2a).

Light Spill and Glare

- 11.132 Croydon Local Plan (2018) policy DM10.9 requires lighting schemes not to cause glare and light pollution. The new Main Stand and floodlight improvement would enhance light containment within the ground and should result in a reduction in light spillage and sky glow. Limited details however have been submitted in regard to light spillage from the building itself, especially given extensive areas of glazing, and from external areas. Further details are recommended to be secured via condition.

- 11.133 The glazed façade could have the potential to reflect light (from southern skies) thereby causing glare. To address this potential effect, the glazing is proposed to be fritted to limit glare and sunlight reflection. Officers are satisfied that the approach to glazing is likely to prevent any undue impacts, although further consideration is recommended to be secured via condition at material submission stage, by requiring the submission of a Solar Dazzle BRE study.

Water Resources and Flood Risk

- 11.134 Croydon Local Plan (2018) Policy SP6.4 states that the Council will seek to reduce flood risk and protect groundwater and aquifers. Policy DM25 provides the Council's detailed requirements in relation to drainage and reducing flood risk.

- 11.135 The London Plan SPG states new development should incorporate Sustainable Urban Drainage Systems with the aim of maximising all opportunities to achieve a green-field run-off rate. A Flood Risk Assessment was submitted as part of the application and whilst information was included that assessed flooding and drainage matters and confirmed that the development is not likely to result in an increased flood risk, the Lead Local Flood Authority (LLFA) were not satisfied that sufficient evidence had been presented to satisfy the policy requirement.

- 11.136 The application has been reviewed by the LLFA, who have confirmed that the proposed development subject to condition would not pose an unacceptable flood risk.

Wind Microclimate

- 11.137 London Plan (2021) policy D9 requires wind conditions around the buildings and neighbourhood to be carefully considered and not compromise

comfort and the enjoyment of open spaces, including water spaces, around the building.

11.138 The applicant has submitted an updated wind assessment as part of the revisions submitted this year. The study utilises computational modelling to predict the strength of wind speeds that would likely occur, and then categorises these using the Lawson Criteria.

11.139 The submitted study concludes that the proposed development with landscaping in situ would result in wind conditions suitable for all existing and proposed pedestrian activities. Even in the worst case season scenario all areas around the stadium including immediate streets would be suitable for outdoor seating or standing/short period sitting. As such the proposal is acceptable in regards to wind impact, with no further mitigation recommended other than conditions in regard to landscaping.

Energy and Sustainability

Policy Context

11.140 London Plan (2021) policy SL 2 'Minimising greenhouse gases', requires major development proposal to be net-zero carbon. This means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the...energy hierarchy'

11.141 Policy SP6.2 of Croydon Local Plan (2018) sets out the Council's expectations in relation to energy and CO2 reduction. This includes the future potential to connect to a district energy network (DEN).

Assessment

11.142 The revised Energy Assessment dated September 2022 outlines that the proposed development is able to comply with relevant strategic and local planning policies. The development will follow the energy hierarchy: be lean (use less energy), be clean (supply energy efficiently), be green (use renewable energy) and be seen (monitor).

11.143 In addition to energy efficiency measures, the energy strategy proposes the provision of an Air Source Heat Pump (ASHP) system and Photo Voltaic (PV) array which provide further carbon emission reductions compared to energy efficiency and passive measures alone.

11.144 The development will include a Building Energy Management System (BEMS) to fully control, monitor and record the various mechanical, electrical and public health systems and to fully monitor the energy usage through the installation of local energy monitors.

11.145 The building would be used to full capacity during first team match-days, and for the remainder of the time the environmental conditions would be

automatically set by the BEMS system to save energy. Whilst the building would be used for events, the intensity of these uses (in terms of energy use) would be well below that experienced during match-days.

11.146 The development would achieve a 34.22% reduction over part L baseline, based on SAP 2012 figures, which is the equivalent to a 58.03% reduction based on SAP 10 figures. The London Plan (2021) requires a 100% reduction of carbon emissions, as such there is a 41.97% shortfall or 178.4 Tonnes per year. Taking account of the use profile of the stadium, as highlighted in paragraph above, the actual carbon shortfall would equate to 30,720 kg Carbon dioxide per year based on SAP 10 figures.

11.147 The shortfall would be offset by a financial contribution of £87,549.66 which is recommended to be secured through a S106 legal agreement. The Council's policy requires the scheme to be constructed to BREEAM "Excellent" standards and a condition is recommended to secure this.

11.148 Typically, a sports stadium does not have a constant base heat load conducive to provision of an off-site combined heat and power plant. The stadium will have large peaks and troughs in energy consumption. Use of combined heat and power (CHP) can only be efficient for a sports stadium on the understanding that other facilities are included within the development which provide the base heat load requirements. There would need to be uses requiring heavy domestic hot water usage or for example, heating of swimming pools etc. These uses are not proposed on non-match-days and in this case, use of CHP would not be feasible.

11.149 Following a review of the practical implications of meeting the various policy requirements, the applicant raised further concerns over the feasibility of connecting to a future District Energy Network (DEN). A key technical requirement of a DEN is to maintain a low return water temperature to maximise efficiency of the generation plant. Whilst this is achievable on a match-day when high loads will be experienced, the applicant has argued that this is not possible when there is minimum load under non-event day operation.

11.150 Even if an energy centre is realised (specific to Croydon Metropolitan Centre) the application site would be approximately 4km away from the energy source and it is most unlikely that the network of pipes would be able to be extended 4km to the stadium. Given that the site is set in a mature residential suburban context, officers are satisfied that the stadium is not a logical location for a separate energy centre and are also content that there is little scope to connect to an existing or future DEN.

Whole Life Carbon and Circular Economy Statement

11.151 Policy SI 7 Reducing waste and supporting the circular economy of the London Plan (2021), requires referable applications to promote circular economy outcomes and aim to be net zero-waste. This includes reusing/recycling of

material from demolition, how the design and construction would reduce material demands and how waste/recycling would be managed as much as possible on site, adequately stored and managed in accordance with the waste hierarchy. The applicant has submitted a circular economy statement that sets out how the development would and could meet these objectives. Appropriate conditions are recommended.

11.152 Policy SL 2 Minimising greenhouse gas emissions of the London Plan (2021) criterion F requires development proposal referable to the Mayor to calculate the whole life carbon emission through a whole life carbon assessment.

11.153 A whole life cycle assessment has been submitted. It confirms that recycle material will be used wherever possible, and that new materials will have an A or A+ Green guide rating, alongside the use of pre-fabricated/ modular construction where possible.

Biodiversity

11.154 London Plan Policy G6 'Biodiversity and access to nature' sets out that development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. The relevant local plan policy is DM27, which states developments should incorporate biodiversity measures.

11.155 A preliminary ecological appraisal of the existing site has been carried out by a qualified ecologist. The survey confirmed that the habitats on site are not expected to go beyond habitats of local significance. The ecologist did identify two buildings with potential to support roosting bats, resulting in further Bat surveys being undertaken. No bats were recorded emerging from the identified buildings, in the dusk emergence survey undertaken on the 8th August 2022. A single common pipistrelle was recorded foraging around the car park in the west of the site during the survey. The survey states that the proposals are unlikely to impact foraging bats.

11.156 The scattered trees, species poor hedgerow, introduced shrub and buildings on site have potential to support nesting birds. These features will either need to be removed outside of nesting bird season (March to August), or when this is not possible a nesting bird check will need to be undertaken.

11.157 The applicant has provided a Biodiversity Net Gain (BNG) Report concluding that the scheme would achieve a BNG of 13.19% or 0.38 habitat units. There would be a very small loss of hedgerow of 0.04 hedgerow units. However, it is noted that Wooderson Close would need to be reconfigured as result of the demolition and that there are opportunities to introduce additional planting including hedgerows on the north east side of Wooderson Close along the boundary with the club's car park, which the applicant is willing to fund. This is recommended to be secured via legal agreement

11.158 Conditions are recommended to ensure that the development is carried out in accordance with the ecological appraisal and bat survey report submitted. In addition, conditions are recommended to secure a biodiversity enhancement strategy (to support the development's attempts to secure a BNG) and further details on the lighting strategy to ensure it does not have an adverse impact on surrounding wildlife.

Designing Out Crime and Resilience to Emergency

11.159 London Plan policy D11 Safety, security and resilience to emergency states that borough should work with the police, and other agencies such as the fire commissioner and British Transport Policy to identify the community safety needs, policies and sites required for their area to support provision of necessary infrastructure to maintain a safe and secure environment and reduce the fear of crime. Development should include measures to design out crime that – in proportion to the risk – deter terrorism, assist in the detection of terrorist activity and help mitigate its effects. London Plan Policy GC6 Increasing efficiency and resilience requires those involved in planning and development to “create a safe and secure environment which is resilient the impact of emergencies including fire and terrorism.”

11.160 The proposed development has been designed to incorporate principles of Secured by Design. Conditions and S106 legal agreement obligations requiring CCTV, delivery and servicing plan, public realm management plan and a car park management plan would ensure that the proposed development provides a safe and secure environment. The Met Police have requested that a planning condition be imposed on any consent to ensure compliance with secure by design standards.

11.161 The consultation with the Police and local residents has identified that spectators arrive and leave in considerable number, moving to and from the nearby railway stations and the site. In terms of maintaining effective and safe crowd control (and to detect crime and antisocial behaviour effectively) a planning obligation is required to fund the provision of CCTV.

11.162 The Club holds regular emergency service training exercises involving organisations such as the National Police Air Service (NPAS) team, the Met Police, London Ambulance Service, Fire Brigade, and the Council. The Club complies with safety of sports ground and fire safety of places of sports legislation and has a permanently staffed security and operations team who co-ordinate match-day and non-match-day safety and security (including crowd control, searching of fans as well as management of the match-day TMO).

11.163 Through a suite of management and physical measures, the proposals would be able to accord with secure by design standards. Similarly, various hard landscaping and highway interventions are proposed to further ensure the safety and security of the development and those attending the stadium. The proposals

have been considered by the Metropolitan Police who are satisfied that, subject to conditions and planning obligations to install appropriate barriers/gates and CCTV, the proposals would design out crime and deter terrorism, assist in the detection of terrorist activity, and help defer its effects.

Fire Safety

11.164 London Plan (2021) Policy D12 Fire Safety requires all major developments to be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party, suitably qualified assessor. The applicant has supplied a Fire Statement dated 18th April, produced by Buro Happold, and approved by Bastien Delechelle (MSc Fire Safety Engineering, MSc Fire Investigation, AIFireE, MSFPE). The application has been reviewed by the Council's Building Control surveyor who raises no objection. The statement is reasonably high level, which is to be expected given the stage the development is at. A revised statement is recommended to be secured at later stage of the development by condition, where matters such as materials and construction methodology have been finalised, and the development will also be required to comply with the relevant Building Regulations (outside the Planning System).

Equity of Access and Mobility

Legislation and Policy Context

11.165 The Equality Act 2010 legally protects people from discrimination in the workplace and in wider society. It replaced previous anti-discrimination laws with a single Act. It sets out the different ways in which it is unlawful to treat someone. The legislation requires local authorities to fulfil a public sector equality duty by considering the impact of policies and proposals on people with protected characteristics.

11.166 London Plan (2021) Policy GG1 Building strong and inclusive communities sets out that good growth is inclusive growth. It sets out a series of requirements to ensure this. The ones most relevant to the proposal are considered to be as follows:

B) Seek to ensure changes to the physical environment to achieve an overall positive contribution to London

C) Provide access to good quality community spaces, services, amenities and infrastructure that accommodate, encourage and strengthen communities, increasing active participation and social integration, and addressing social isolation

D) Seek to ensure that London continues to generate a wide range of economic and other opportunities, and that everyone is able to benefit from these to ensure that London is a fairer, more inclusive and more equal city.

E) Ensure that streets and public spaces are consistently planned for people to move around and spend time in comfort and safety, creating places where

everyone is welcome, which foster a sense of belonging, which encourage community buy-in, and where communities can develop and thrive

H) support and promote the creation of a London where all Londoners, including children and young people, older people, disabled people, and people with young children, as well as people with other protected characteristics, can move around with ease and enjoy the opportunities the city provides, creating a welcoming environment that everyone can use confidently, independently, and with choice and dignity, avoiding separation or segregation

I) support and promote the creation of an inclusive London where all Londoners, regardless of their age, disability, gender, gender identity, marital status, religion, race, sexual orientation, social class, or whether they are pregnant or have children, can share in its prosperity, culture and community, minimising the barriers, challenges and inequalities they face.

11.167 The NPPF (2021), as well as Mayor's Accessible London: Achieving an Inclusive Environment SPG and Mayor's Planning for Equality and Diversity on London SPG (2007) are also of relevance.

11.168 In taking planning decisions, Members are required to take account of the provisions of the Human Rights Act 1998 as they relate to the planning application and the conflicting interests of the applicants and any third party opposing the application. As a public authority, the Council must not act in a way which is incompatible with a Convention right protected by the Act. Human rights of particular relevance to this decision are those under Article 8 of the European Convention on Human Rights (in relation to the right to respect for private and family life), Article 1 Protocol 1 to the ECHR (in relation to the protection of property) and Article 14 (which prohibits discrimination in the enjoyment of human rights). It is an inherent feature of the planning system that these rights are respected and that consideration is given to the impact of development proposals on the human rights of individuals, whilst acting in the wider public interest. The availability of judicial review is considered to be sufficient to provide the procedural safeguards required by Article 6(1) of the ECHR (in relation to a fair hearing in the determination of civil rights). The provisions of the Human Rights Act 1998 have been taken into account in the processing of the application and the preparation of this report, including the consideration of consultation responses.

11.169 In addition, the Equality Act 2010 provides protection from discrimination in respect of certain protected characteristics namely: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. It places a local authority under a legal duty ("the public sector equality duty") to have due regard to the following matters in the exercise of all its functions including its planning powers, namely the need to:

- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act;

- advance equality of opportunity between persons who share a "relevant protected characteristic" (i.e. the characteristics referred to above other than marriage and civil partnership) and persons who do not share it; and
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Equality

11.170 The Club have submitted an Equalities Statement that sets out that the Club have an existing equality policy and have published a Disability Access Statement. The club state that they are committed to identify, confront and eliminate discrimination, whether by reason of race, colour, nationality, religion or belief, sex, sexual orientation, marital or civil partner status, age, ethnic and national origin, pregnancy or maternity, disability or gender reassignment. The Club intends to ensure that everyone who wishes to engage with the club, whether as matchday fans, staff, players, board members, participants in Foundation programmes and any other person engaged with the Club's activities, has a real and equal opportunity to do so.

11.171 The public sector equality duty has been taken into account in the assessment of the application and Members must be mindful of this duty when determining it. Members of protected groups in the wider community potentially affected by the proposed development would include:

- visitors to the area;
- residential occupiers in the vicinity of the site (including housing which is to be demolished) and along main routes from the stadium to rail stations,
- occupiers of other land within the vicinity of the stadium, including business and land owners.

11.172 Equality Impact Assessments (EqIA) were undertaken in connection with the Croydon Local Plan: Strategic Policies 2013, and more recently an EqIA was undertaken for the Croydon Local Plan 2018. As detailed in earlier sections of this report, the current development proposals are generally in accordance with the Croydon Local Plan 2018 which has been found to be sound on equality issues on the basis of an EqIA.

11.173 The EqIA undertaken for the Proposed Submission Croydon Local Plan (2018) did not identify any elements that are specific to the application site. However, the following is of relevance:

- Need for to rehouse displaced tenants and for replacement housing to be provided to ensure no net loss of residential floor space or land.
- Need for facilities for disabled persons.
- Implementation of the present proposals is considered to include the following benefits for protected groups:
 - Providing more job opportunities and making provision for skills training;
 - Providing facilities to meet the needs of people with disabilities;
 - Conserving and creating spaces and buildings that are safe, accessible and that

- Foster cohesive communities.

11.174 It is considered that the development proposals could have a negative impact on some protected groups, but only over a temporary period. There would be temporary negative impact on groups due to disruption in the area surrounding the site during the construction phase. However, suitable mitigation measures will be put in place during the construction process to reduce the adverse effects on these groups.

Loss of Housing Relationship to Equality

11.175 A negative impact has been identified in terms of the loss of 6 houses (including 5 affordable housing units) in Wooderson Close. There has been extensive consultation with affected residents by the Council and applicant. The consultation has enabled the Council to identify the housing needs of the affected residents. To mitigate the impact, it is proposed that these residents be rehoused in equivalent (size, quality, tenure etc) accommodation (the cost of which will need to be met by the applicant).

11.176 Additionally, a planning obligation is to be secured requiring the delivery of 6 dwellings elsewhere in the Borough to ensure there would be no net loss of housing as a result of the development.

Disabilities

11.177 The Club has worked in conjunction with the Disabled Supporters Association to ensure that the facilities at Selhurst Park Stadium are of a standard that provides a safe and enjoyable visit when watching Premier League football. The Club recognises that the built environment has a fundamental affect upon people's lives and that inclusion is an evolving and an integral part of the whole process of the design, construction, management and maintenance of buildings and public space environments.

11.178 At present there are 128 spaces available within the stadium for wheelchair users (and their personal assistants). The proposal would increase this to 192 spaces. Both home and away fans can use accessible toilets inside the stadium. The Club shop is accessible for all fans and has a low-level serving counter. Catering kiosks in the home and away sections have low-level serving counters and so are fully accessible. The Club provide match commentaries for the visually impaired from Radio Mayday, via headsets, at their seat.

11.179 The proposals provide accessible viewing areas for all disability groups, including ambulant disabled spectators and offers a range of good quality viewing options from different positions.

11.180 The provision of accessible positions has been developed in line with the specific design requirements of the proposed "Main Stand", analysis of the existing aggregated provision of the three adjacent retained stands and the

specific design guidance set out in the DCMS Guide to Safety at Sports Grounds 5th Edition (the “Green Guide”).

- 11.181 For a stadium with a proposed maximum seated capacity of circa 34,000 seats, Green Guide Table 4 notes a requirement for 150 wheelchair spaces, plus 3 per every 1,000 above 20,000 spectators. For the redeveloped Selhurst Park, the required wheelchair provision would therefore be 192 wheelchair spaces which would be exceeded following implementation of the proposed scheme proposals.
- 11.182 Two sensory rooms are also proposed to be accommodated within the “Main Stand (Level 1 - Lower Concourse Level). Sensory rooms are unique spaces (a calm environment away from the noise and crowds in stadiums) which allow adults and children with difficulties such as autism to watch live matches from a room with a window onto the pitch.
- 11.183 Accessible WC’s and concession facilities are provided throughout the building and at every hospitality level and to both the lower and upper tier concourses. The proposed scheme would also achieve the recommended provision of wheelchair positions in hospitality seating. Appropriately located and sized refuge areas would be provided adjacent to lifts used for evacuation.
- 11.184 There is at present approximately 3% (16) of total parking spaces on site designed for wheelchair users. The proposal would see the ratio increase to in line with the development plan policy.
- 11.185 The enhancements proposed represent a significant improvement over the existing situation and it is noted that these go beyond minimum planning requirements. The approach taken weighs strongly in favour of the development.

Equality Conclusion

- 11.186 The proposed development is considered to have had due regards to inclusivity, diversity and equality, and meets the requirements of London Plan Policy GG1. The proposed development also proposes a number of significant public benefits that will improve its community offer, helping it to achieve its inclusivity objectives, and help support good work that the club, and associated affiliations such as Palace for Life regularly undertake.
- 11.187 In summary, the assessment of the application has taken into account equalities issues for individual protected groups. Steps are being taken to minimise the adverse effects on protected groups during construction (including the loss of housing). The proposals will bring a range of benefits to disabled and other protected groups including in relation to enhanced access to the stadium, replacement housing provision and employment/training opportunities.

Other Matters

11.188 This report is a summary of the main considerations identified above. All other relevant policies and considerations, including equalities, have been taken into account.

12. SUMMARY AND CONCLUSIONS

12.1 Officers would recommend that members for legal clarity consider the application afresh without reference to the previous resolution. If this process of determination is carried out, then officers feel it is clear that the application should be granted on its own merit and would advise for members to make this clear when reaching their decision.

12.2 The main substantive policy changes in relation to the development since the previous committee are considered by officers to be the following:

- Introduction of Urban Green Factor (London Plan (2021) policy G5.
- Fire Safety (London Plan (2021) policy D12
- Strengthening of Air Quality (SL 1), Energy and Carbon Dioxide Emissions (SL 2), introduction of Whole Life Carbon and Circular Economy (SL 7)
- Building beautiful and greater recognition of value of trees (NPPF revisions 2021)

12.3 Officers would advise that in their opinion the changes in policy, although significant enough to require re-consideration at committee, in themselves are relatively minor in comparison to the scheme and consideration as whole. Many are technical issues which have not related to substantial changes to the development proposal. So even where new deficiencies in policy are identified, as is the case for urban greening for example, this in officers' view, would not significantly tilt the balance, and outweigh benefits.

12.4 The proposed development complies with the aspirations of the development plan. Officers, within this report, have identified minor discrepancies when considered against the more detailed policies of the development plan, which have been justified and mitigated accordingly.

12.5 However, if members are minded to consider refusing the application, care should be given to how this decision is reached in the context that the application had previously received an unanimous recommendation to approval from committee in 2018. Consistency of decision is an important cornerstone of the planning system. We would advise that regard in particular should be given to how the development plan and policies within them have changed since April 2018, and how that may lead members to a different balanced judgement and conclusion, appropriately weighing any identified harm against the benefits of the development.

12.6 With the stated planning obligations and planning conditions listed above, officers are content that there are no material considerations which would cause sufficient harm to outweigh the development's benefits and compliance with the development plan. In view of the level of compliance with development plan policies, planning permission should therefore be GRANTED for the reasons set out above.