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**Monks Orchard Residents'
Association
Planning**

4th October 2023

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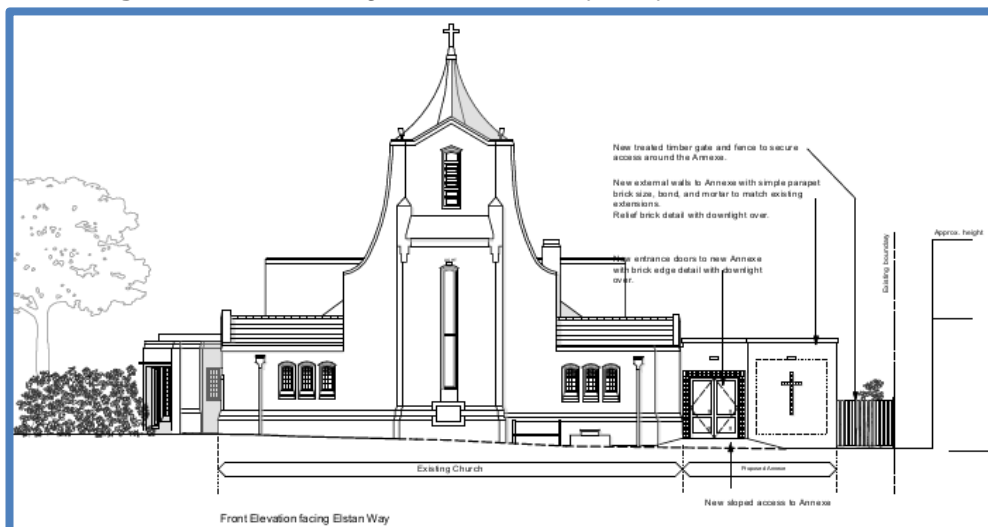
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Reference: 23/03345/FUL
Application Validated: 31 Aug 2023
Address: St George's Church of England, Elstan Way Croydon CR0 7PR
Proposal: Erection of a single storey extension with a maximum height of 4.91 metres to the northern elevation of the Church to provide a new annexe to St. George The Martyr with associated internal and external alterations.
Status: Awaiting decision
Consultation Expiry: 12 Oct 2023
Determination: 26 Oct 2023
Case Officer: Georgina Betts

Dear Georgina Betts

Please accept this letter as formal support for approval of **Application Ref: 23/03345/FUL** for the Erection of a single storey extension with a maximum height of 4.91 metres to the northern elevation of the Church to provide a new annexe to St. George The Martyr with associated internal and external alterations at **St George's Church** of England, Elstan Way Croydon, CR0 7PR.



St Georges Church Front view facing Elstan Way & The Glade Shirley.



Google Image of St George's Church and surrounding dwellings.

1 Introduction

1.1 Site Heritage Assessment

1.1.1 Although it is understood that a national listing application for St George's was turned down, Croydon Council have included it on their Locally Listed assets as a building of heritage and having special architectural interest and as such considerations have to be made for authenticity, architectural, historical and technical significance and townscape value.

1.1.2 However, it is noted that the Church of St George, Elstan Way, is not listed as a Site of Nature Conservation or Special Scientific Interest, Metropolitan Green Belt, or Metropolitan Open Land in the current adopted Croydon Local Plan or on the current published Policies Map. It is therefore unclear exactly what the Heritage Status is for St. Georges Church. As such, we would suggest it does not attract the significant planning restriction requirements afforded to a formal assessment of a heritage site for this planning application for an extension of a proposed Annexe.

1.2 Character of Church Building

1.2.1 The Church was built during early to mid-1950's using traditional brick with a pitched roof of clay pantiles, some areas of flat roof, and a copper covered and finned spire. Like many, the church consists of a nave, a north aisle and a centre aisle, and a sanctuary in continuation of the nave. The Lady Chapel and a series of ancillary rooms (lavatories, vestries, etc) surround the sanctuary.



1.2.2 The proposed extension would be 4.91m high which would be 5cm less than the previous refused proposal (Ref: 22/01925/FUL) and would be ≈2.15m from the shared boundary and ≈3.15m from the adjacent dwelling at 51 The Glade.

1.2.3 The proposal would reflect the existing structure in form, material and design and would therefore merge seamlessly into the overall visual aspect of the Church. The Front facing elevation as displayed to the street scene would not be considered obtrusive or incongruous.

2 Relevant Planning Policies

2.1 Croydon Local Plan (2018) Policies appropriate for Heritage Sites & Extensions.

2.1.1 SP1.2 – Requires that Place Making Policies should respond to and enhance local character for heritage assets and the identity of the ‘Places’ of Croydon.

2.1.2 SP4.11 to SP4.15 – requires Local Character, Conservation and Heritage sites to be strengthened and protected and wherever possible improved.

2.1.3 DM10.1 – Requires Proposals should be of high quality and should respect the existing Development pattern, Layout and siting. Also, the Scale massing and the appearance, existing materials and build character should reflect that of the locality.

2.1.4 Policy DM10.9 – Seeks opportunities to enhance and emphasise the key features of heritage assets or seek to encourage the use of public spaces etc.

2.1.5 Policy DM18.1 – Heritage assets and conservation requires development would only be permitted if their significance is preserved or enhanced and have no adverse impact on the existing setting.

2.1.6 Policy DM18.2 – States that any applications for development proposals that affect Heritage Assets must demonstrate how particular attention has been paid to Scale height and massing, design details and materials.

2.1.7 Policy DM18.3 – Requires any alterations or extensions should enhance the character, features and settings of the building and not adversely affect the asset's significance.

2.1.8 Policy DM 18.5 – Indicates substantial weight will be given to protecting and enhancing the heritage asset and make a positive contribution to the special character and appearance of the local heritage Area.

2.1.9 Policy DM26.2 – As general guidance, extensions to existing buildings should not be more than 20% of the original Floor Space.

2.1.10 These Policies are generally very subjective and can allow varying personal degrees of interpretation to an observer or a planning officer. The proposal uses materials to blend in with the existing. However, the proposal is an improvement to the functional facilities of the church and provides additional capabilities and community usage and we therefore are of the view that the proposal does not contravene any of these stated policies.



2.1.11 The Croydon Plan Policies occasionally reference the Supplementary Planning Document SPD2 - Extensions and Alterations, but this document was revoked in June 2022.

2.2 **The London Plan (2021) Chapter 3 Design – Quality and character**

2.2.1 The Policy Requires Developments should be respondent to the existing character of a 'place' by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character.

2.2.2 We are of the view that the proposal improves the Heritage Asset and does not contravene any of these stated policies.

2.3 **The London Plan Policies for Heritage Sites (Chapter 7).**

2.3.1 Para 7.1.3 – Ensuring the identification and sensitive management of London's heritage assets, in tandem with promotion of the highest standards of architecture, will be essential to maintaining the blend of old and new that contributes to the capital's unique character. London's heritage reflects the city's diversity, its people and their impact on its structure. When assessing the significance of heritage assets, it is important to appreciate the influence of past human cultural activity from all sections of London's diverse community. Every opportunity to bring the story of London to people and improve the accessibility and maintenance of London's heritage should be exploited. Supporting infrastructure and visitor facilities may be required to improve access and enhance appreciation of London's heritage assets.

2.3.2 Para 7.1.8 – Where there is evidence of deliberate neglect of and/or damage to a heritage asset to help justify a development proposal, the deteriorated state of that asset will be disregarded when making a decision on a development proposal.

2.3.3 Para 7.1.7 – Heritage significance is defined as the archaeological, architectural, artistic or historic interest of a heritage asset. This may be represented in many ways, in an asset's visual attributes, such as form, materials, architectural detail, design and setting, as well as through historic associations between people and a place, and where relevant, the historic relationships between heritage assets. Development that affects heritage assets and their settings should respond positively to the assets' significance, local context and character to protect the contribution that settings make to the assets' significance. In particular, consideration will need to be given to mitigating impacts from development that is not sympathetic in terms of scale, materials, details and form.

2.3.4 Para 7.1.11 – Developments will be expected to avoid or minimise harm to significant archaeological assets. In some cases, remains can be incorporated into and/or interpreted in new development. The physical assets should, where possible, be made available to the public on-site and opportunities taken to actively present the site's archaeology. Where the archaeological asset cannot be preserved or managed on-site, appropriate provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset, and must be undertaken by suitably qualified individuals or organisations.



2.3.5 Again, these Policies are very subjective. We have not found any Policy reference pertaining to extensions of Heritage Structures or Heritage Sites.

2.4 **London Plan Guidance (LPG)¹ Characterisation and Growth Strategy LPG.**

2.4.1 Para 3.1.4 – “... When undertaking this appraisal, practitioners should consider the interrelationship between these different elements of value, as the presence of certain characteristics may be valued differently, from multiple perspectives and/or may be mutually supportive/valued. For instance, heritage assets may have not only a heritage value, but social, environmental and economic value too.”

2.4.2 This exactly illustrates the benefits to both community and the regular local congregation afforded by the proposed extension of facilities as defined for the proposed extension Annexe.

3 **Objectives of the Proposed Annex extension**

3.1 The proposed Annex extension would provide an additional junior church meeting room within the building, which would remove the need for the junior church to move to a separate building part way through a service to comply with revised safeguarding protocols appropriate for younger people.

3.2 The provision of a larger accessible w.c. for congregation members and building users with Disabilities and complex Mobility issues.

3.3 The provision of additional facilities to enable the Church to support the local community with facilities not currently available within the existing building complex for social and community groups. The proposed Annexe will rationalise functions within the Church and release additional spaces for further community and church uses.

3.4 The Applicant has provided a “Statement of Need” in their “Planning Statement” which delineates the improved functionality, facilities and capabilities offered by the proposed Annex Extension to those currently available.

4 **Assessment**

4.1 The proposal would increase the existing floor space of 387.64sq.m. by 121sq.m. (Application form measurements) to 508.64sq.m. which is a 31.21% increase. However, as a percentage of the full St. George’s Church Site area of 5,920sq.m. (as measured on Google Earth), this 121sq.m. area is only 2.044%.of the total site Area and therefore we would suggest, is a very small reduction in the overall loss of green space area.

4.2 The proposal would therefore reduce the area of green space by ≈121sq.m. to the north side (very poor sunlight) of the Church grounds. The area is not well maintained and is mainly hidden from general view. This would be a very small loss of green space of ≈2%, when weighed against the benefits of this proposal.

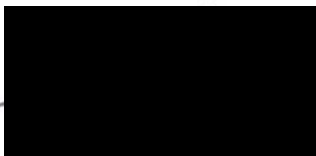
¹ <https://www.london.gov.uk/sites/default/files/2023-06/Characterisation%20and%20growth%20strategy%20LPG.pdf>



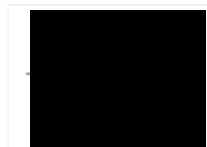
- 4.3 We would also suggest the proposal meets or at least does not contravene or detract from any of the requirements of the above listed Policies.
- 4.4 The Policies are mainly subjective to personal interpretation. However, if the Case Officer disputes our analysis, we would respectfully request detailed information supporting such an assessment or raise a condition to rectify the analysis rather than refuse the proposal.
- 4.5 It should be recognised that the local community served by St. George's Church has very few community facilities and the proposal would provide an additional function and activity capacity to contribute to very limited existing local facilities and enhance community cohesion which would be of significant benefit to the local community.
- 4.6 In the light of this evaluation and assessment we would strongly recommend that this application is approved.
- 4.7 If the Case Officer has concerns regarding any aspect of the proposal in relation to Heritage Policies, it would be helpful that those concerns be ameliorated or resolved by conditions of approval rather than by a refusal of the complete proposal.
- 4.8 Please register the **Monks Orchard Residents' Association (Support)** the proposal on the Public Access Register.

Kind regards

Derek



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MORA Executive Committee, Local affected Residents & Interested Parties