



Rev	Date	Drawn	Description
A	20.10.16	ESM	Overall site wide update
B	22.12.16	MGM	Site A & C changed from Malpas to Flats
C	07.12.16	MGM	General update to Sites A-C & J
D	12.12.16	MGM	Road & parking layout update to Site B
E	13.12.16	MGM	Revised layout to Site F
F	14.12.16	MGM	Redline boundary updates
G	22.12.16	MGM	Site wide update for preliminary issue
H	22.12.16	MGM	Site wide update for planning
J	09.01.17	MGM	For planning submission
K	03.05.17	NLD	Updated following planners comments
K	10.05.17	AVC	Workshop on block F updated following planners comments

For Surface Materials, please refer to the Longheath Gardens Landscape Plan, drawing, *CBC_NHP_HTA_L_S26_DR_0900*

Notes:
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 Drawing to be read in conjunction with outline specification.

Longheath Gardens
 drawing title: Ground Floor Masterplan
 drawing number: CBC_NHP_A_DR_0140
 client project: Brick/Croydon New Build Housing Programme
 scale: 1:500
 drawing date: 10/05/17
 drawing by: MTL
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FOR PLANNING

PART 7. Planning Applications for Decision

Item 7.1

1 SUMMARY OF APPLICATION DETAILS

Ref: [16/06508/FUL](#) (*Link to associated documents on the Planning Register*)
 Location: Parcels of Land Adjacent Longheath Gardens and Long Lane, Croydon. CR0 1XT
 Ward: Ashburton
 Description: Demolition of existing garages and erection of 6 buildings varying in height between two and six storeys comprising a total of 23x2 bedroom and 30x1 bedroom flats. Provision of associated car parking, landscaping and other associated works.
 Drawing Nos: CBC_NHP_HTA_A_S26_DR_0040, 0062, 0094, 0140 (rev K), 0144 (rev A), 0190, 0200, 0205, 0210, 0215, 0220, 0225, 0230, 0235, 0236, 0240 (rev C), 0245 (rev B), 0250, 0251, 0255, 0256, 0304, 0319, 0320, 0321, 0322, 0326, 0327, 0328, 0332, 0352, 0353, 0354, 0355, 0364, 0365, 0900 (rev C), 0901 (rev B) (ALL rev A unless stated otherwise)
 Applicant: Brick by Brick (Croydon) Ltd
 Agent: Carter Jonas Ltd
 Case Officer: Richard Freeman

	1 bed	2 bed	3 bed
Houses			
Flats	30	23	

Number of car parking spaces	Number of cycle parking spaces
72	78

1.1 This application is being reported to Planning Committee because the Ward Councillor, Councillor Andrew Rendle made representations in accordance with the Committee Consideration Criteria and referred the application to Planning Committee and as objections above the threshold in the Committee Consideration Criteria have been received.

2 RECOMMENDATION

2.1 That the Planning Committee resolve to GRANT planning permission subject to:

A: Resolutions to grant planning permission by Planning Committee in respect of applications LBC Refs 16/06491/FUL (Station Road, South Norwood) 16/06512/FUL (Auckland and Sylvan) 16/06505/FUL (Tollers Lane) 16/06514/FUL (Heathfield Gardens)

B: The grant of planning permission (to be determined under delegated powers) in respect of application LBC Ref 16/06469/FUL (Drummond Road)

Should either A or B above not be determined in accordance with the above outcomes, the planning application the subject of this report would be required to be referred to Planning Committee for reconsideration (specifically around

affordable housing delivery – in view of the tranche-wide nature of the affordable housing offer).

- 2.2 That the Director of Planning and Strategic Transport has delegated authority to issue the planning permission, negotiate the legal agreement referred to in condition 1 below and impose conditions and informatives to secure the following matters:

Conditions

- 1) Legal agreement to secure the following planning obligations:
 - a) Offsite delivery of affordable housing
 - b) Provision of Travel Plan including car club spaces and membership
 - c) Local employment and training strategy
 - d) Minor off-site highway improvements
 - e) Review mechanism regarding affordable housing delivery
 - f) Any other planning obligation(s) considered necessary by the Director of Planning and Strategic Transport
- 2) Development implemented in accordance with submitted drawings
- 3) Details of materials to be submitted and approved
- 4) Detailed design of entrance frames and balcony handrails to be agreed
- 5) Various side facing windows and sides to balconies to be screened
- 6) No windows other than as shown
- 7) In accordance with Lighting Strategy, Noise Report and Air Quality Report
- 8) Landscaping scheme including maintenance strategy to be submitted and approved
- 9) Full details of all proposed land level changes to be agreed
- 10) Noise from air handling units
- 11) Contaminated land assessment to be submitted and approved
- 12) Retention of car (72 spaces) and cycle (78 spaces) parking spaces in accordance with detailed design to be approved
- 13) Provision of electric vehicle charging spaces
- 14) In accordance with Travel Plan
- 15) Provision of car club space
- 16) Approval of construction logistics plan, low emissions strategy & detailed design of ecology measures
- 17) Provision of children's play space – full details to be submitted
- 18) In accordance with Tree Protection measures
- 19) In accordance with mitigation measures of ecological survey
- 20) Water efficiency
- 21) Sustainable development 35% carbon dioxide reduction
- 22) Approval of detailed design of a surface water drainage scheme
- 23) Development to commence within 3 years of the date of permission
- 24) Any other planning condition(s) considered necessary by the Director of Planning and Strategic Transport, and

Informatives

- 1) Community Infrastructure Levy (CIL) – Granted
- 2) Details as regards donor site arrangement
- 3) Removal of site notices
- 4) Code of practice on construction sites
- 5) Any other informatives considered necessary by the Director of Planning

- 2.3 That the Planning Committee confirms that it has paid special attention to the desirability of preserving or enhancing the character and appearance of the Church Road Conservation Area as required by Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 2.4 That the Planning 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 PROPOSAL AND LOCATION DETAILS

Proposal

- 3.1 Demolition of various existing garages erection of six buildings and the provision of 53 residential units, with associated works and parking.
- 3.2 The garages to be demolished are located between existing blocks of flats on Longheath Gardens. Three blocks of five garages are located on the section of Longheath Gardens running broadly north-south (Plots G, H & I) and one block of 11 garages is located on the second spur from the south of Longheath Gardens (Plot K), between terraced houses. Two further blocks of 7 garages each are located between four storey flat blocks, located towards the western edge of the estate. A total of 40 garages are proposed to be demolished. The site of these two last blocks of garages would be redeveloped as set out below; the other garages courts would be laid out as 25 parking spaces available to existing residents.
- 3.3 The proposed buildings are detailed below. Blocks are labelled alphabetically starting at the north-west rear of the site, running south along the rear and then north along the front:
- Blocks A and B are proposed at the rear of the site, between existing four storey blocks of maisonettes. The design and layout of the two blocks would be similar, comprising three storeys; two dual aspect units per floor with balconies to the front (facing south east). As such the two blocks would accommodate a total of 12x2-bed 4-person flats. 11 parking spaces would be provided to the front of Block A. To the front of Block B would be 6 parking spaces and the existing play area would be reconfigured and upgraded. A substation building is also proposed.
 - Block C would be similar to Blocks A and B but with a larger footprint, using a larger gap between existing buildings. Four storeys are proposed with three units per floor, comprising 9x1-bedroom 2-person units and 3x2-bedroom 4-person units, including one wheelchair unit. 11 parking spaces, including four wheelchair bays are proposed in the vicinity of both blocks.
 - Block D would be located towards the southern end of the row of maisonette buildings, adjacent to a pedestrian route along the tram line and close to the "World of Golf". It is proposed as part 4 and 6 storeys containing 2x1-bedroom 2-person wheelchair units on the ground floor and 6x2-bedroom 4-person flats above.
 - Block F would be located towards the main entrance to the estate, where Longheath Gardens leads off the local section of Long Lane. It would be a part 3 and part 2 storey block of 5 units including one wheelchair 2-bedroom 3-person unit, 2x1 bedroom 2-person units and 2x2-bedroom four-person units. The block would be

orientated to the south-west and north-west with only high level or obscure glazed windows facing north-east and south-east. 10 parallel parking spaces, including one wheelchair space are proposed near to this block.

- Block J would be located at the northern edge of the site on Milford Gardens. It is proposed as an L-shaped part 3 and part 4 storey building comprising 14 units. The units would be 1x1-bedroom 1-person unit, 4x1-bedroom 2-person units 2x2-bedroom 3-person wheelchair units, 3x2 2-bedroom 3-person units and 4x2-bedroom 4-person units. The block is designed with a circulation core to the rear, with accommodation generally orientated to face to the north, east and west. 9 parking spaces, including two wheelchair spaces are proposed adjacent to the proposed block with access off Milford Gardens.
- The scheme does not include a “Block E” which was to accommodate a replacement community centre towards the southern part of the estate.

- 3.4 It is proposed to landscape areas around blocks and where parking would be provided. This would include tree planting to the garage courts, tree planting more generally, soft and hard landscaping to the front of existing blocks at the rear of the site and the upgrading of the existing play area at the rear. Informal play opportunities would be incorporated into an upgraded pedestrian route running north-south in front of the blocks to the rear. Amended plans have been received which change the proposed layout of this area to reduce the amount of hardstanding and retain two trees of value.
- 3.5 These amendments now allow for new turning heads and parking areas to the front of the blocks towards the rear of the site. These areas allow for refuse vehicles to turn and service the individual blocks from the turning heads; the original strategy saw an access route provided for refuse vehicles between the different spurs of Longheath Garden. The amended drawings do not change the amount of proposed parking which totals 72 spaces across all sites. 39 parking spaces would be lost, resulting in a net gain of 33 spaces.
- 3.6 The amended scheme proposes the loss of 21 individual trees and one group of 2 trees and replacement planting of 87 trees.
- 3.7 This application has been submitted as part of a wider programme of approximately 50 sites ('Portfolio') across the Borough of Croydon. The applicant has stated that they aim to deliver 1,000 residential units of which half are intended to be delivered within affordable housing tenures. Each site is the subject of a separate planning application with the Portfolio divided into tranches. To date, three tranches of applications have been submitted, which amounts to applications on 28 sites for approximately 540 dwellings of which 235 are proposed as affordable housing tenures.
- 3.8 The affordable housing proposed is not balanced across all the sites within tranches and Portfolio, with some sites proposing more affordable housing and some less, with developments which are “minors” (which do not require affordable housing provision in policy terms) also proposing some affordable housing. As such, some sites act as “donor” sites in affordable housing terms and others are “beneficiaries” (i.e. they are sites which require affordable housing in policy terms which is being provided off-site or as a mixture of on and off-site).

- 3.9 The site is within Tranche 3. The applicant proposes to deliver 43% of affordable housing across Tranche 3 in accordance with the donor site arrangement summarised above. This development would constitute 100% affordable housing, providing 24 units as affordable rent accommodation and 29 units of intermediate accommodation as shared ownership units. As such the site is a donor for various others within the tranche.
- 3.10 The planning consideration for the donor site arrangement is set out in greater detail below.

Site and Surroundings

- 3.11 The area of the site forms an estate located off Long Lane (a London Distributor Road). A loop of Long Lane provides access to the main section of Longheath Gardens which runs parallel to Long Lane, with four spurs off it at right angles running approximately east-west. The area was first extensively developed as temporary post-war accommodation in the 1950's as series of detached and semi-detached houses. The estate in its current form was laid out and constructed in the 60's and 70's. It consists of a small number of bungalows, semi-detached two-storey houses towards at the front of the site with terraces of two and three storey flats and maisonettes towards the centre of the site. Four storey blocks of maisonettes are arranged in rows at the front and rear of the site as well as on the ends of the spur roads.
- 3.12 Beyond the estate, the tram line is located to the north-west with playing fields and South Norwood Country Park beyond. A path runs from the south-west corner of the site (adjacent to proposed Block D) along the tram line to the Arena tram stop. To the north-east, beyond the Borough boundary the area becomes more mixed with some industrial and warehousing units towards Elmers End tram stop and Elmers End itself, dominated by the Tesco supermarket. To the south-east of the site, on the opposite side of Long Lane is Long Lane oak woodland which is publicly accessible and is designated as Metropolitan Open Land and a Site of Importance to Nature Conservation. To the south-west is the "World of Golf" site comprising a driving range and adventure golf facility on land which is also designated as Metropolitan Open Land.
- 3.13 The site has a Public Transport Accessibility Level (PTAL) generally of 2 (on a scale from 0 – 6), indicating poor connectivity. Small areas nearest to Arena tram stop and the north-east corner of the site are PTAL 3.

Planning History

- 3.14 Whilst the estate has retained its original form and structure there have been several developments as well as residential extension and alterations (which are not listed below):

95/02068/P	Demolition of works area, erection of single storey community centre and church, with parking.
	Approved and implemented. This building is located towards the south west corner of the estate and is used by Longheath Community Centre.
08/01684/P	Installation of play area.

Approved and implemented. This relates to the existing play area towards the rear of the estate.

VARIOUS Erection of 2-storey buildings to form Milford Gardens as a series of semi-detached houses.

Approved and implemented in the north-west corner of the estate. The two storey buildings form a cul-de-sac adjacent to existing bungalows and semi-detached houses.

4 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- 4.1 There are no protected land use designations on the site and therefore the principle of residential development is acceptable, subject to assessment of other related planning considerations. The proposals near to the designated Metropolitan Open Land would have an acceptable impact on the openness of the designated area;
- 4.2 Whilst the proposed development would result in some change to the character of the area, this would be minimal and off-set by the positive elements of better signposting routes through the estate and provision of high quality accommodation;
- 4.3 The proposed development would contribute positively to borough-wide housing targets and alongside other sites coming forward (as part of an overall tranche-wide delivery of housing across the borough) will contribute positively to the delivery of affordable housing across the various affordable housing tenures. This scheme is proposed as a mixture of shared ownership and affordable rent tenures, which is considered acceptable;
- 4.4 The layout of development ensures that the proposal would not have an unacceptably detrimental impact on the amenity of the neighbouring residents;
- 4.5 The development would provide an acceptable standard of living for future residents of the development in terms of internal accommodation and external amenity space. Four units would be north facing but this is not considered to be so significant as to warrant the refusal of the application;
- 4.6 A robust Transport Assessment has been submitted which demonstrates that the development would not have a detrimental impact on highway safety and that parking demand can be accommodated on the surrounding road network and through the provision of parking spaces. A S.106 Agreement would secure a green travel plan and car club spaces;
- 4.7 Some mature trees of value would be lost. A robust planting strategy and provision for the planting of 87 trees is however proposed which is considered to ameliorate this loss.

5 CONSULTATION RESPONSE

- 5.1 The views of the Planning Service are expressed in the MATERIAL PLANNING CONSIDERATIONS section below.
- 5.2 The following were consulted regarding the application:

Lead Local Flood Authority (Statutory Consultee)

- 5.3 Objection to the initially proposed drainage strategy. The strategy has been subsequently amended to address the LLFA concerns. In relation to the amended scheme, the LLFA have removed their objection subject to conditions including that the run-off from green roofs is calculated and considered in calculation storage area volumes.

Crime Prevention Officer

- 5.4 No comments received

Waste Officer

- 5.5 Confirmed access arrangements for waste are suitable and specified storage required.

6 LOCAL REPRESENTATION

- 6.1 The application has been publicised by way of 15 site notices displayed near the application site. The application has also been publicised in the local press. The number of representations received from neighbours, local groups etc in response to notification and publicity of the application were as follows:

No of individual responses: 46 Objecting: 46 Supporting: 0 (1 objection made on behalf of the local Residents Forum)

No of petitions received: 1 (objecting) Signatures 118 (formed of identical proforma letters)

- 6.2 The following issues were raised in representations. Those that are material to the determination of the application, are addressed in substance in the MATERIAL PLANNING CONSIDERATIONS section of this report:

- Out of keeping with area results in overdevelopment and a change in character
- Blocks are too close and of a different design and no reason for height of Block D
- Loss of visual amenity
- Adverse impact on open character of the area
- Overdevelopment and overcrowding breaking down the existing community
- Loss of light, outlook and privacy to adjacent properties
- Overbearing and dominating
- Additional noise, anti-social behaviour and disturbance
- Noise and disturbance during construction
- Drainage system unable to cope with extra pressure
- Loss of green space and significant loss of very high quality trees
- Adverse impact on wildlife
- Loss of children's play areas
- Detrimental impact on local highway situation, existing lack of spaces and poor road network
- Additional traffic will cause air pollution
- Inadequate parking will exacerbate existing parking problems
- Construction traffic unsafe for children
- Swept path analysis drawings do not consider parked cars

- Car club bay should be provided
- Existing infrastructure already strained e.g. schools, doctors, public transport
- Lack of provision of affordable housing
- Lack of investment in existing housing stock

6.3 Councillor Andrew Rendle made representations (objecting) on the following issues:

- Flood risk
- Overcrowding
- Loss of green space
- Risk of increased crime
- Parking

7 RELEVANT PLANNING POLICIES AND GUIDANCE

7.1 In determining any planning application, the Council is required to have regard to the provisions of its Development Plan so far as is material to the application and to any other material considerations and the determination shall be made in accordance with the plan unless material considerations indicate otherwise. The Council's adopted Development Plan consists of the Consolidated London Plan 2015, the Croydon Local Plan: Strategic Policies 2013 (CLP1), the Croydon Replacement Unitary Development Plan 2006 Saved Policies 2013 (UDP) and the South London Waste Plan 2012.

7.2 Government Guidance is contained in the National Planning Policy Framework (NPPF), issued in March 2012. The NPPF sets out a presumption in favour of sustainable development, requiring that development which accords with an up-to-date local plan should be approved without delay. The NPPF identifies a number of key issues for the delivery of sustainable development, those most relevant to this case are:

- Section 4: Promoting sustainable transport
- Section 6: Delivering a wide choice of quality homes;
- Section 7: Requiring good design;
- Section 8: Promoting healthy communities;
- Section 10: Meeting the challenge of climate change and flood risk;
- Section 11: Conserving and enhancing the natural environment;
- Section 12: Conserving and enhancing the historic environment.

7.3 The strategic and local policies that need to be taken into account as part of the Planning Committee deliberations are as follows:

7.4 Consolidated London Plan 2015 (LP):

- 3.3 Increasing housing supply
- 3.4 Optimising housing potential
- 3.5 Quality and design of housing developments
- 3.6 Children and young people's play and informal recreation facilities
- 3.8 Housing choice
- 3.9 Mixed and balanced communities
- 3.11 Affordable housing targets
- 3.12 Negotiating affordable housing on individual private residential and mixed use schemes

- 3.13 Affordable housing thresholds
- 5.1 Climate change mitigation
- 5.2 Minimising carbon dioxide emissions
- 5.3 Sustainable design and construction
- 5.11 Green roofs and development site environs
- 5.13 Sustainable drainage
- 6.9 Cycling
- 6.10 Walking
- 6.11 Smoothing traffic flow and tackling congestion
- 6.13 Parking
- 7.1 Lifetime neighbourhoods
- 7.2 An inclusive environment
- 7.3 Designing out crime
- 7.4 Local Character
- 7.6 Architecture
- 7.7 Location and design of tall and large buildings
- 7.14 Improving air quality
- 7.19 Biodiversity and access to nature
- 7.21 Trees and woodland

7.5 Croydon Local Plan: Strategic Policies 2013 (CLP1):

- SP1.2 Place Making
- SP1.3 Growth
- SP2.1 Homes
- SP2.3 & SP2.4 Affordable homes
- SP2.5 Mix of homes
- SP2.6 Quality and standard of homes
- SP4.1 & SP4.2 Urban design and local character
- SP4.5 Tall buildings
- SP4.13 Protection of heritage assets
- SP5.2 Health and wellbeing
- SP5.3 Protection of community uses
- SP6.1 Environment and climate change
- SP6.2 Energy and carbon dioxide reduction
- SP6.3 Sustainable design and construction
- SP6.4 Flooding
- SP7.4 Biodiversity
- SP8.3 & SP8.4 Pattern of development and accessibility
- SP8.6 Sustainable travel choice
- SP8.12 & SP8.13 Electric charging infrastructure
- SP8.17 Parking outside of high PTAL areas

7.6 Croydon Replacement Unitary Development Plan 2006 Saved Policies 2013 (UDP):

- UD1 High quality and sustainable design
- UD2 Layout and siting of new development
- UD3 Scale and design of new buildings
- UD6 Safety and security
- UD7 Inclusive design

- UD8 Protecting residential amenity
- UD13 parking design and layout
- UD15 Refuse and recycling storage
- R06 Protecting the setting of Metropolitan Open Land and Metropolitan Green Belt
- RO8 Protecting Local Open Land
- NC4 Woodland Trees and Hedgerows
- EP1 Control of potentially polluting uses
- EP2 and EP3 Land contamination
- T2 Traffic generation from development
- T4 Cycling
- T8 Parking
- H2 Supply of new houses

7.7 CLP1.1 & CLP2

- The Partial Review of Croydon Local Plan: Strategic Policies (CLP1.1) and the Croydon Local Plan: Detailed Policies and Proposals (CLP2) have been approved by Full Council on 5 December 2016 and was submitted to the Planning Inspectorate on behalf of the Secretary of State on 3 February 2017. Policies which have not been objected to can be given some weight in the decision-making process. However, at this stage in the process no policies are considered to outweigh the adopted policies listed here to the extent that they would lead to a different recommendation.

7.8 There is relevant Supplementary Planning Guidance as follows:

- London Housing SPG March 2016
- The London Mayoral (Draft) Affordable Housing SPG. This document is currently out for consultation which seeks to provide a more robust, transparent and clear approach to the delivery of affordable housing (both on and off site). The SPG also recognises a wider range of affordable housing tenures and how the value of these tenures might be maximised whilst ensuring overall affordability for Londoners to either rent a home or purchase a property. Whilst the London Mayor is encouraging all boroughs to adopt the approaches outlined by this draft SPG and it indicates a clear direction of travel, the weight to be afforded to this document is limited at present.

8 MATERIAL PLANNING CONSIDERATIONS

8.1 The main planning issues raised by the application that the committee must consider are:

1. Principle of development and density
2. Affordable housing and housing mix
3. Townscape and visual impact
4. Residential amenity
5. Living conditions of future occupiers
6. Highway safety and car parking demand and supply
7. Trees and biodiversity
8. Other planning matters

Principle of Development and Density

- 8.2 The appropriate use of land is a material consideration to ensure that opportunities for development are recognised and housing supply optimised, including providing a variety of housing types and unit mix.
- 8.3 The site is not subject to any policy designations that should be afforded weight in the determination of suitability of the land for use as residential, although the decision taker needs to also consider other related policies when considering the overall planning merits. As the site is in a predominantly residential area, the principle of further residential development is appropriate. The adopted and emerging local plan and the adopted alterations to the London Plan have challenging housing targets and it is important that the borough maintains its 5-year housing supply and contributes positively to the supply of new housing (across all unit sizes and tenures).
- 8.4 Most the buildings would be located on parcels of grass between blocks that, due to their relationship to the residential buildings, are less likely to be well used. These are of varying quality and utility. UDP Policy RO8 Protecting Local Open Land states that sites of less than 0.25 hectares that are too small to show clearly on the Proposals Map will be treated as Local Open Land if they meet one or more of the designation criteria outlined in supporting text to Policy RO8. Whilst the site overall is more than 0.25 hectares, the individual sites are not. Of the designation criteria, it could be argued that the site could fall under criteria: e) open land in the Borough with residential densities of more than 150 habitable rooms per hectare because of their amenity value, being situated in heavily built-up areas h) sites with valuable functions such as amenity, sports, recreation or kick-about areas, or allotments; or j) open land within or on the edge of the built-up area which adds character to the fabric of the urban area.
- 8.5 In terms of the above criteria, the amenity value of the open spaces is relatively low, with them being located between blocks and being provided as grassed areas and circulation routes. It is notable that there are other areas within the wider estate which offer higher quality open space than the areas which form proposed Blocks A-D, namely the existing play space, which is proposed to be upgraded. Plots F and J are better connected to the buildings surrounding them, but they are both still located to the sides of existing buildings and fronting onto adjacent highways and so do not form a high quality amenity area due to these relationship. Similarly, the estate is very near to South Norwood Country Park and the woodland on the opposite side of Long Lane and a play area associated with the "Tollgate" scheme (reference 16/06422/FUL with a resolution to grant planning permission subject to a condition requiring the delivery of the play area) would be approximately 200m from the southern section of the site. With regards to criterion e) whilst the plots are open land, they are not spaces which have a formal play, recreation or exercise value. There are a significant number of larger and more valuable open spaces near to the site, as described above. In terms of criterion h), there is scope for some of the spaces to be used informally for play or recreation. However, there is an existing play area catering for children under 8 within the estate which would be replaced and upgraded and various areas of informal play designed for small children are proposed in the landscape. In terms of criterion j) the site is within a built-up area. The area immediately around the site generally consists of flat blocks set within communal areas. The scheme has been designed with this context in mind and as such does not have a significant impact on the overall character of the fabric of the urban area.

- 8.6 Whilst these small landscaped parcels of land are valued by residents, it is not considered that they meet the criteria to be treated as Local Open Land. As such the principle of development is supported.
- 8.7 Block D is proposed in close proximity to the “World of Golf” site, which is defined as Metropolitan Open Land (MOL). Policies protect the open nature of such designations and restrict them being developed and require developments nearby to not harm the visual amenity of the areas. The appearance of the proposed building is discussed below (under Townscape) however the building is not considered to have a significant impact on the open nature of the MOL given its setting within an urban context and that various other buildings are visible from the land.
- 8.8 The proposed play strategy is based upon Mayor for London’ Supplementary Planning Guidance 2012 Providing for Children and Young People’s Plan and Informal Recreation. Using the playspace calculations set out, 210m² of under 5’s space, 60m² 5-11’s space and 30m² 12+ space should be provided. The proposal would provide a new 5-11’s space which would well exceed the 60m² requirement. Two areas of under 5’s play space would be provided as well as playable elements within the landscape, which would provide significantly more than 210m². As such, this is considered to outweigh the lack of provision of 30m² for 12+ year olds and is acceptable.
- 8.9 The proposal would result on the loss of several garages. These garages are not protected. Impact on highways and parking is discussed further below.
- 8.10 Table 3.2 of the London Plan and the related Policy 3.4 deals with density of development (linked to PTAL levels). It advises that “suburban” areas are characterised by predominantly lower density development such as detached and semi-detached houses, small building footprints and typically buildings of between two and three storeys. “Urban” areas are within 800m of a District Centre and have terraces, mansion blocks and buildings of different footprints of two to four storeys. The site and surrounding area therefore has a generally suburban characteristic. The policy therefore suggests that between 150 and 250 habitable rooms should be provided per hectare. The scheme contains 132 habitable rooms and has an area of approximately 0.8ha and so falls within this broad bracket. The matrix advises that based on 2.7 habitable room per unit, this should equate to 50-95 units per hectare. The proposal falls comfortably within this bracket.
- 8.11 This policy should not be applied mechanistically and should take a number of other factors into account, including the character of the existing area. The existing estate contains approximately 54 units per hectare (which falls within the same brackets of the London Plan) so has a similar density to the proposal. The existing and proposed schemes would have a combined density of approximately 60 units per hectare, again falling comfortably within the policy guidance.
- 8.12 All units are one or two bed flats and as such the proposal does not represent the best mix of unit sizes. However, 23 of the 53 units proposed would be 2 bedroom 4 person units which would be suitable for family accommodation. Additionally, other sites within the tranche, most notably the Tollers Lane site provide a very high proportion of family units. The mix is considered appropriate.
- 8.13 The principle of the proposed use is acceptable subject to other material considerations as addressed below.

Affordable Housing and Housing Mix

- 8.14 The provision of affordable housing is a necessary pre-requisite to providing a diverse variety of homes that meets a range of housing needs. All major schemes should provide affordable housing and where the maximum policy compliant affordable housing level is not 50%, a viability appraisal should be undertaken to justify the more limited levels proposed. CLP Policy SP2 makes a presumption, outside of the Metropolitan Centre, that affordable housing will be delivered on site. However, the London Plan envisages that there may be circumstances where affordable housing is provided off-site as part of a donor site arrangement where it allows for the delivery of higher levels of affordable housing, or other benefits. Overall the London Plan acknowledges that it may be necessary for a flexible approach to be taken towards the provision of affordable housing to encourage residential development.
- 8.15 The applicant has so far submitted 28 planning applications across the Borough, seeking to deliver an ambitious and progressive housebuilding programme (including the delivery of significant levels of affordable housing) across the Portfolio and has indicated that it intends to deliver these schemes across a series of tranches. The applicant has confirmed their intention to adopt a donor site arrangement across the Portfolio to deliver affordable housing, with the sole purpose to maximise the amount of affordable housing that can be delivered across each tranche. This approach can be supported if it secures the delivery of more affordable housing than the normal policy approach.
- 8.16 This site forms part of Tranche 3 which comprises of 6 sites, all of which are “major” developments requiring up to 50% affordable housing, subject to viability. The sites in Tranche 3 are as follows:

Applicant's affordable housing proposal – Tranche 3		Proposed tenure			
Application Number	Name	Private units	Affordable Rent units	Shared Ownership units	Total No of Units
16/06505/FUL	Tollers Lane	22	0	18	40
16/06514/FUL	Heathfield Gardens	20	0	0	20
16/06512/FUL	Auckland and Sylvan Hill	38	0	19	57
16/06508/FUL	Longheath Estate	0	24	29	53
16/06469/FUL	Drummond Road	28	0	0	28
16/06419/FUL	Station Road, South Norwood	14	0	0	14
	TOTAL	122	24	66	212

- 8.17 As all the sites in Tranche 3 are major sites, the total maximum amount of affordable housing that policy would require would be 106 units, of which 64 would be affordable rent accommodation and 42 would be shared ownership.
- 8.18 Affordable housing policy makes clear that the delivery of affordable housing should consider site viability considerations to ensure that affordable housing requirements

do not result in schemes overall being undeliverable (in viability terms). In such circumstances, it can be acceptable to deliver less than 50% affordable housing (including delivery of an alternative affordable tenure mix).

8.19 The schemes were reviewed by an independent viability consultant. This concluded that, after considering several different factors and contingencies, the sites might well be able to support the following provision of affordable housing at a policy compliant mix (60:40 in favour of affordable rent):

Viable levels of affordable housing – Tranche 3		Proposed tenure			
Application Number	Name	Private units	Affordable Rent units	Shared Ownership units	% Affordable provision
16/06505/FUL	Tollers Lane	35	3	2	13%
16/06514/FUL	Heathfield Gardens	20	0	0	0%
16/06512/FUL	Auckland and Sylvan Hill	14	26	17	75%
16/06508/FUL	Longheath Estate	22	19	12	58%
16/06469/FUL	Drummond Road	28	0	0	0%
16/06419/FUL	Station Road, South Norwood	14	0	0	0%
	TOTAL	133	48	31	37%

8.20 The applicant has challenged several assumptions that informed this independent review, including the value of affordable rent units, existing land values and the final sales values. Notwithstanding the applicant's concerns, officers consider that the review output is a reasonable position and should not be as easily discounted. However, as with all such exercises, there are several assumptions made which are invariably open to interpretation and further analysis (especially where sales values and land values are difficult to determine, with general lack of comparables). In this instance, there is a fair degree of uncertainty, as some of the sites are in locations where there have not been a high number of sales of comparable units to use to benchmark valuations. Consequently, whilst officers are broadly content at this stage to accept the applicant's viability case, with such uncertainty, it is recommended that a review mechanism be utilised to allow for a review of the scheme viability at the point of commencement, to determine whether there is scope to either increase the level of on-site delivery and/or to modify the mix of affordable housing accommodation to bring delivery closer to the 60-40 affordable housing split (in favour of affordable rent) as envisaged by policy.

8.21 Notwithstanding the applicant's concerns, the independent viability review has demonstrated significant differences in levels of viability for the different sites, based in part on their location, site constraints and the prices which tend to be achieved in the local area. It shows that some sites could support a fair amount of affordable housing and half could not support any. The appraisal shows that some sites could support more than 50% affordable housing which, if considered individually as opposed to as a tranche would not be necessary in policy terms. Therefore, taking viability and the maximum policy position into account, the amount of affordable

housing which the sites could support, if assessed individually as opposed to as a tranche, would be 36 units of affordable rent and 23 units of shared ownership, which would equate to an average of 28% affordable housing (across the major applications).

8.22 Taking this information, it can be compared against the applicant's tranche-wide affordable housing offer:

Name	Affordable rented units	Shared ownership units	Total affordable units	% Affordable provision
Viable major sites (capped at 50%)	36	23	59	28
Tranche-wide offer	24	66	90	43

8.23 Whilst the tranche-wide approach would deliver 12 fewer affordable rent units and would be reliant on delivery across a range of donor sites, it would also result in an additional 31 affordable housing units overall (although all this uplift would be shared ownership tenures rather than affordable rent tenures). This would represent a 50% increase over and above what would be expected for the major applications (albeit with a very different tenure split).

8.24 It is considered that this increased supply of shared ownership affordable housing would meet an identified need for affordable accommodation and would go some way towards meeting the affordable housing requirements set out in the development plan and as such, the supply of an additional 31 shared ownership units would outweigh the deficit of 12 affordable rent units.

8.25 The donor sites in Tranche 3 are spread throughout the Borough and support the delivery of "mixed and balanced communities" which is one of the objectives of the London Plan policy requiring on-site delivery. The applicant has demonstrated on a Ward by Ward basis that the provision of shared ownership tenure accommodation would be desirable, especially as shared ownership tenures are under-represented in the application areas.

8.26 This scheme comprises most of the affordable units within the tranche. These units would be spread throughout the estate and includes over half as shared ownership units, which could over time become private for sale units (following potential stair-casing) adding to the tenure mix of the local area.

8.27 This method of delivery of affordable housing is innovative and demonstrates a flexible approach to securing affordable housing which is supported by the London Plan. Whilst it is not fully in accordance with the provisions of the development plan, off site affordable housing provision is anticipated by planning policy documents. Taking this approach would facilitate a significant uplift in affordable housing delivery, over and above standard policy requirements. These benefits of a tranche-wide, donor site approach to affordable housing provision in this case (being the provision of an amount of affordable housing above policy requirements, a demonstration that the maximum viable amount and mix of affordable housing on major sites is being secured and that this approach allows sites to be developed that would otherwise be unviable) would outweigh any harm caused by the failure to deliver affordable housing on a site by site basis. Subject to the use of a subsequent viability review (prior to commencement of development), officers find the approach proposed by the applicant to be acceptable.

- 8.28 As the applicant currently has no ownership interest in the land the subject of this proposed development, it is recommended that a planning condition be imposed preventing any development from taking place on site unless and until all parties with a legal interest in the land (including the applicant) have been joined as parties to a legal agreement under S.106 of the Town and Country Planning Act 1990, with specific covenants specified to prevent occupation of a percentage of private sale units on site until such time as prescribed levels of on and off site affordable housing across Tranche 2 have been completed and are available for occupation/hand-over. The required heads of terms (including the requirement for a viability review) will be set out within any condition. This recommended approach (using a planning condition to require a later S.106 Agreement to be completed) has been successfully tried and tested by the London Legacy Development Corporation in relation to sites near the former Olympic Stadium and a similar approach was recommended by your officers in relation to the College Green/Fairfield Halls submission, which was accepted by the Planning Committee in February 2017. This approach will ensure that this important tranche of developments and the significant amount of affordable housing will be delivered.
- 8.29 Planning applications have been submitted for all sites within Tranche 3. Four applications are being reported to Planning Committee concurrently, with others proposed to be determined under delegated powers or at a later Planning Committee. The affordable housing analysis set out above covers all the sites in the tranche, so should an application be refused by Planning Committee or under delegated powers, the figures above would change. The RECOMMENDATION to Committee sets out a mechanism for reporting applications back to the Committee, should this be necessary.

Townscape and Visual Impact

- 8.30 The overall estate layout is a series of buildings ranging from single storey (bungalows near to Plot J) to four storey maisonettes (running along the front and rear of the site) with a mix of two and three storey terraced houses and flats in between.
- 8.31 The proposed development in many ways follows this existing character in terms of the built form. The buildings on Plots A&B are proposed as three storeys and would sit well with the four storey blocks adjacent. The height transition created by the parapet wall would mediate between the ridge and eaves height of the adjoining buildings. The buildings on either side are on a staggered angle; the front elevation would follow the line of the building to the north, which is considered appropriate and reflect the layout of the existing blocks. The rear elevations are deeper than the blocks to the north but the blocks are not of such a mass that they are considered inappropriate for the area.
- 8.32 Block C would follow a very similar design approach to Plot A and B, but would be taller, to reflect the wider plot and gap between the existing buildings. The height would be above the neighbouring buildings, which is considered appropriate given the width of the site; the proportions of the width, height and separation of the elevation into bays would help emphasise the horizontal elements of the proposal and would allow the building to sit comfortably with its neighbours.
- 8.33 Block D would be taller, at six and four storeys with the mass broken down by the change in height and two different brick colours. The orientation of the block means that it would not present the widest elevation to the approaches to the block within the estate. The lower, four storey elements would be focused towards the southern element of the building with the taller to the rear and facing out onto the tam lines and

the Country Park beyond. The height and width of the block would add to the legibility of the estate by signposting the route to the tram stop. The arrangement of windows and main elevations to the south optimises sunlight and daylight penetration and provides surveillance to the pedestrian route which leads to the Tramstop and the Country Park, adding to safety and security of the local area.

- 8.34 Block F would be a split two and three storey block located close to the entrance in to the estate and adjacent to three storey maisonettes. The taller element would be located at the corner, with the lower element enclosing the urban block of the run of buildings which front on to Long Lane and Longheath Gardens. The heights span the transition from the existing maisonettes to two-storey semi-detached houses. The block would have a mainly southerly orientation with the main entrance located in the centre of this block. This entrance location would allow the block to be read as a new element, facing on to the Longheath Gardens entrance to the estate. The heights are considered appropriate in terms of the relationships with neighbouring built form and the slight increase in height on the corner also marks the main vehicular route in and out of the estate.
- 8.35 Block J would be located towards the northern end of the estate and would also enclose the urban block formed by the buildings on Long Lane and Longheath Gardens. This block would form a built frontage to Milford Gardens which is currently only addressed by the side elevations of the neighbouring buildings and so would more positively define the street. The building height would be four storeys at the north-east corner, which is the most open corner (with no buildings opposite). To either side of the four-storey corner element the proposal drops to three storeys where adjacent to neighbouring buildings. The transition in height from three storeys, with a flat roof to the two storey plus pitched roof height of the semi-detached property adjacent is considered appropriate as the building steps down to meet it. The front elevation of the return element, which would be next to the semi-detached house, follows the same building line as those properties on Long Lane.
- 8.36 The blocks follow a common style, being generally contemporary in appearance, of brick construction, with balconies partially or fully recessed into elevations to provide depth to facades. Parapet walls would be utilised to increase height where appropriate, to form transitions with neighbouring buildings. Similarly, the mass of larger buildings would be broken down through use of contrasting brickwork. Circulation cores would also be expressed, generally through recessed elements with the communal entrances marked with canopies to ensure their legibility. The quality of the brickwork used and the detailing of the balconies and depth of window reveals, being the main elements which punctuate the brickwork, are very important in securing the overall quality of the design of the blocks and so conditions are recommended to ensure that details of the design are submitted for approval, as well as the materials to be used.
- 8.37 The blocks overall would result in a reduction of open space in the estate. As set out above, the impact of blocks both individually and cumulatively would be acceptable in terms of the character and townscape of the area. The change to the character of the estate would however be minor as the existing built form locates four storey maisonettes in an area of mixed building heights. The impact on the overall character and appearance of the area is therefore considered to be acceptable and the location of taller elements within the estate follows a rationale relating to adjacent building height, plot size and indicating key routes through the estate.

Residential Amenity

Blocks A & B

- 8.37 The adjacent buildings have no side facing windows, so the main location of the blocks would have no significant impact on light or outlook. The rear elevations of the blocks do not significantly overrun the rear elevations of the existing buildings to the north, therefore having an acceptable impact in terms of light or causing an increased sense of enclosure. Due to the orientation of the blocks, the proposals would be located to the rear of the buildings to the south. In both instances the buildings would be further away from the southern boundary and as the orientation of these buildings is to the north, they would not result in a significant impact on light and outlook.
- 8.38 The proposal would result in a large side elevation being located facing these blocks. They would be located between 8 and 10m from the rear elevations of the existing buildings to the south with some window openings to break up the mass of buildings. These windows are secondary to the rooms which they serve, which have main outlook to the front or rear, so could be conditioned to be provided as obscure glazing should this be necessary. On balance, given the communal nature of the gardens they would overlook, and that they would be at right angles to the rear elevations of the buildings to the south, this is not considered necessary.

Block C

- 8.39 This block has a very similar relationship as blocks A and B. The relationship in terms of windows and daylight and sunlighting would be the same. The proposed block is larger than A and B however the plot has different dimensions. The plot is larger towards the rear, resulting in the proposed side elevation being 7m from the rear elevation of the building to the south at the nearest point and over 5m from the boundary deeper into the site. This separation distance, combined with the angle of the block and the opportunity for planting afforded to the side of the block, to break up the lower levels of the building, are considered to satisfactorily overcome the impact of the side elevation on outlook from the most adjacent properties.

Block D

- 8.40 The main height of Block D would be located adjacent to the blank elevation of the building to the north. The four-storey element would project in front of the block to the south. However, due to the separation distances involved, only eight windows of 56 in the block would fail the BRE criteria for daylight and sunlight and seven of these rooms are located beneath balconies, with the balconies having a significant impact in terms of the amount of daylight available. These rooms would still have adequate availability of views of the sky and met the requirements for sunlight and so on balance this impact is considered acceptable.

Block F

- 8.41 Whilst the main section of Block F would again be located adjacent to a blank side elevation, the two-storey element extends to the rear of the building to the north to enclose the urban block. However, due to the two-storey height of this block, with a flat roof, only two windows would fail to meet daylighting requirements and these are again affected by balconies in the current situation. One window would also have a minor transgression for provision of sunlight in mid-winter but this would be minor. Whilst the

proposed block would extend to the rear of the block to the north, the technical impacts on daylight and sunlight would be minimal. Whilst the proposal would have an impact in terms of a sense of mass close to the boundary, it is relevant that these units are dual aspect, which would remain unaffected by the proposal. Furthermore, these properties are maisonettes spread over two floors, so the impact on the upper floor would be minimal. As such, the overall impact in terms of outlook would be acceptable.

8.42 During processing the application, amended plans were received with regards to this block which re-sited the two-storey element 300mm away from the northern property boundary to reduce the impact. The windows proposed in that northern elevation, which serve a bedroom at first floor, have been amended to be high level only, above 1.7m from the internal floor level, so that they would not result in a loss of privacy. One first floor side window is proposed which, whilst it would be some 18m from the rear elevation of the semi-detached property to the east, would be close to the boundary and so could overlook the rear garden. This has been amended to be obscure glazed, and would be conditioned as such, and made smaller to reduce any residual sense of overlooking.

Block J

8.43 This block would be located to the north of the existing units and so would therefore be less likely to have a significant impact on daylight and sunlight. The existing side facing windows in 263 Long Lane (the semi-detached property adjacent) would be affected by any proposal on this plot of land. The first floor main habitable room windows are orientated to face the front and rear (east and west) so the impact of a loss of light to the side window is considered to be reduced. Furthermore, it is noted that the semi-detached properties which make up this street typically have a side facing first floor window which faces on to the immediately adjacent flank elevation of the neighbouring block. The impact therefore is not out of keeping with the local area. The ground floor window is a secondary window to a room with the main window located on the rear elevation, so the impact is considered acceptable. Whilst the rear elevation of the proposed block would be 1.5m deeper than the main rear elevation of the existing house, considering that there would be a 5m separation, this would not have a significant impact on outlook or a sense of enclosure.

8.44 The block would be located to the rear and to the north of the three storey maisonettes at 297-306 Longheath Gardens. The rear elevation of this property also has recessed ground floor elements beneath a first floor access which significantly reduces the existing daylight levels. Given the location of the property to the north and that the rear building line of the proposed block would be 10m away at a 45 degree angle, the impact on light and outlook is considered acceptable. The two-storey detached building on the opposite side of Longheath Gardens/Milford Gardens has a living room in the front elevation which would be affected by the proposal. This is the only room in the house which would be affected and it is noted that this property has good, uninterrupted, outlook to the north over Tannery Close. The impact on that property is therefore considered to be acceptable. The proposal would be too far from the single storey buildings to the south west to have a significant impact, being 40m away and on the opposite side of the road.

8.45 This block would run along the side of the existing gardens of these properties and at a height of three and four storeys would lead to some sense of enclosure. The taller part of the building would however be located 10 and 17m from the neighbouring properties and so the impact is not considered to be so significant to warrant the refusal

of the scheme. It is also of note that the area is characterised by a mix of building heights, including four storey buildings similar distances from single storey buildings.

- 8.46 In terms of overlooking, the windows in this building would generally face outwards towards the street. Above ground floor, all windows are either secondary or non-habitable. Those that are at right angles to the maisonettes and nearest are recommended to be obscure glazed through a condition. Those in the rear elevation of the return element are a similar distance from the maisonettes as the existing semi-detached properties and so, whilst higher, on balance it is not considered necessary to secure these as obscure glazing.

General Site Impact

- 8.47 The increased number of properties has been assessed to be appropriate for the area in terms of density and so whilst it would lead to additional residents the impact in terms of noise and disturbance is unlikely to be significant. Incidental areas of grassland would be lost to the development which do provide some visual amenities. However, landscaping is proposed which would improve the area in front of the existing and proposed blocks at the rear of the site and create a landscaped, mainly pedestrianised street, improving the quality of the public realm at the heart of the estate. This general impact on the estate is therefore considered to be acceptable.

Living Conditions of Future Occupiers

- 8.48 Policy SP2.6 requires that all new homes meet the needs of the residents over a lifetime by achieving the minimum standards set out in the Mayor of London's Housing Supplementary Planning Guidance. The Nationally Described Space Standards (NDSS) provide minimum technical space standards for new dwellings in terms of the internal amenity space. All the proposed units meet the minimum required internal space standard.
- 8.49 The Daylight/Sunlight Report states that in terms of daylight, some of the proposed units would fail the "Average Daylight Factor" criteria for daylight to main living areas other than bedrooms. These failures tend to be mainly between 1.6% and 1.9% (against a target value of 2%) although a small number of rooms would be more significantly affected. However, these rooms would still have good access to the sky and exceed the target of 80% of the room having a view of the sky. Additionally, all of these affected rooms would have sufficient levels of access to sunlight. Only four units in the scheme do not meet the proposed sunlight criteria and those are only because side-facing windows on to an enclosed balcony require assessment due to their aspect. Given that the orientation of the blocks most affected by daylighting levels at the rear of the site is set by the existing buildings they are surrounded by, it is considered impractical to re-orientate the building to achieve a greater amount of sun or daylight.
- 8.50 In Block J, 4x1-bedroom 2-person units would be north facing (1 per floor) and as such would have poor access to sunlight. A mainly recessed balcony would allow some small amount of outlook and light from the north east. The balcony would extend beyond the front elevation of the block slightly to allow that to have a more open aspect but it is acknowledged that these units would have poor levels of access to sunlight, but the levels of daylight are considered acceptable. The constraints of this site do make providing these units with better light and outlook impractical – if windows were located in the southern elevation they would directly overlook the gardens of properties

to the south. Considering that this is a small number of units in the overall scheme, this is not considered to be sufficient to warrant the refusal of the application.

- 8.51 As regards external amenity space, the London Housing SPG states that a minimum of 5 sqm of private outdoor space should be provided for 1-2 person dwellings and an additional 1 sqm added for each additional occupant. UDP Policy UD8 requires development proposals to provide residential amenity space to be considered as an integral part of the design of the overall development concept. Each unit has a separate garden, courtyard or balcony which accords with the required space standard.
- 8.52 A Contaminated Land assessment has been undertaken and assessed. The submitted report was based on only partial site investigations so further studies are necessary, which can be secured by condition. The investigation also found contaminants present so a remediation strategy will be required, which can also be secured by condition.

Highway Safety and Car Parking Demand and Supply

Access

- 8.53 The number of trips expected to be generated by mode by the proposed scheme has been calculated using a combination of trip databases TRICS and TRAVL together with 2011 Census information. The trip generation analysis has indicated that the proposed scheme would generate a moderate level of vehicular traffic in the peak periods: 19 car trips in the AM peak and 18 in the PM peak. This would equate to one vehicle every three minutes during the peak hours. Vehicle movements would be less frequent outside of peak hours. This level of trip generation is expected to be able to be accommodated within the existing highway network.
- 8.54 Vehicular access would be provided directly from the existing road network. Emergency vehicles would be able to gain direct access to the residential units directly from Longheath Gardens and the areas of hardstanding which would be created in front of Blocks A – D. Amended drawings were received during processing the application in order to balance the amount of hardstanding in front of these blocks with the desire for this to be a landscaped strip and not dominate the area with hardstanding. This has changed the proposed servicing strategy, which would have seen the two sets of spur roads of Longheath Gardens be linked to provide a loop for bin lorries and emergency vehicles. This was considered to have too detrimental an effect on the loss of trees of value and would likely lead to the area becoming dominated by parking. Therefore the amended servicing strategy would see bin lorries turn in the enlarged turning heads at the end of the Longheath Gardens spur roads. These areas are considered to provide adequate areas to turn vehicles safely and provide suitable access. A condition is recommended to ensure that the details of this are submitted for agreement.
- 8.55 Pedestrian access and footpaths would be retained and would be locally upgraded for the new pedestrian street running north-south in front of Blocks A – D. This route would be provided as a shared surface within the parking courts and an improved pedestrian routes between the enlarged turning heads at the ends of Longheath Gardens and would be secured by condition.
- 8.56 A preliminary Construction Logistic Management Plan has been submitted with the application. As the development is at planning application stage, a contractor has not yet been appointed and the applicant has not been able to provide full details of site

layout and management or the numbers or timing of deliveries. Prior to the appointment of the Principal Contractor a Construction Management Plan should be developed alongside the pre-commencement Health and Safety Information (PCI), also required by the Construction (Design and Management) regulations 2015 (CDM 2015).

Parking

- 8.57 The site is located within an area with a public transport accessibility level (PTAL) rating level of 2-3 which is considered to have moderate access to local transport links. The site is however within a 10 minute walk of trams at Arena and Elmers End tramstops and two bus routes on Long Lane.
- 8.58 There are 40 existing garages on site, to be removed. Of these, 30 are let to individuals who live within 1.5 miles of the site and therefore it can be assumed that these spaces are either used for parking or storage. However, it is noted that they are less than 5m deep and/or 2.8m wide and are therefore likely to be too small to be used for the parking of modern vehicles. 39 on and off street parking spaces would be lost to the development. The scheme proposes 53 additional residential units and Census data from the local area shows that households have on average 0.8 vehicles available to them, resulting in approximately 45 vehicles likely to result from the development.
- 8.59 Parking stress surveys have also been undertaken, which the applicant argues demonstrates that an average of 19 unrestricted vehicle parking spaces are available within 200m of the development at peak times. The proposal also includes the provision of 72 spaces (including reprovision of the lost 39 spaces). The applicant therefore argue that the proposal would result in the generation of demand for 84 spaces (45 new vehicles + 39 spaces lost). With 72 spaces proposed and an average of 19 spaces available on street, they consider that impact on parking would be acceptable.
- 8.60 London Plan parking standards state that one to two bed units should have less than one parking space per unit while three bed units should have a maximum of 1.5 parking spaces per unit. Based on the unit types the proposal would demand a maximum of 53 parking spaces – although the general tenor of policy is to seek reduced car parking levels – thereby reducing private car trips and encouraging more sustainable modes of travel (including walking, cycling and use of public transport).
- 8.61 Officers acknowledge that parking demand on the surrounding streets is high, but the findings of the parking stress test are considered to be reliable, with 19 spaces generally available. Due to the high parking stress, a Travel Plan Statement has been prepared for the site and a car club space is also proposed. The benefits of a Travel Plan focus on promotion of alternatives to the private car, thereby reducing the congestion and increased opportunities for active healthy travel, such as walking and cycling. The inclusion of the car-club space would benefit proposed and existing residents and it is estimated that such a provision would reduce parking demand by 6-8 spaces. These measures would be secured as part of the future S.106 Agreement process.
- 8.62 Overall, whilst high parking street in the area is recognised, by reason of the number of parking spaces and sustainable travel options proposed, including a car club space, it is not considered that the development would harmfully worsen the existing situation. The proposal accords with the thrust of the London Plan whereby providing downward pressure on the availability of car parking space is a key approach to slowing the

increase of car use within London and the proximity of the site to both Arena tram stop and Elmers End tram and metropolitan rail links is also noted. Conditions are recommended to ensure that parking is provided in a satisfactory fashion to ensure that there is no detrimental impact on highway safety.

- 8.63 The London Plan cycle parking standards for residential development are one space per one bed units and two spaces per unit for all other dwellings resulting in a requirement of 76 spaces, plus one space for visitors. A condition is recommended to secure a total of 77 spaces in accordance with the above requirements.

Trees and biodiversity

- 8.64 The Arboricultural Report identifies that there are 53 arboricultural items within the site area, comprising 49 individual trees and 4 groups. The proposal would result in the loss of 21 trees and one group of two trees following the receipt of amended plans.
- 8.65 Amended plans were sought due to concerns with the amount of hardstanding to be created in front of Blocks A – D and that this would result in the unnecessary removal of two Grade B trees. Amended drawings were received which retain these trees as the area is no longer required for servicing. Officers are satisfied that whilst the proposal would result in the loss of a significant number of trees, the majority of them, 14, are graded C and as such the loss of these trees is considered acceptable when mitigated by the 87 replacement trees. A number of Scot's Pines and Cypress trees are prominent in the area, the former especially along the boundary with the tram line. A condition is recommended to secure details of replacement planting and landscaping, which it is recommended should include the above species as well as those proposed by the applicant to support biodiversity improvements.
- 8.66 An Ecological Assessment has been submitted with the application. It has identified low probabilities of the existing buildings to be demolished or the trees to be felled as providing bat roosts. Some trees may contain nesting birds and so it is recommended that they are felled outside of the season. Habitat improvements in terms of landscaping species and bat and bird habitats are recommended, which is considered acceptable.

Other Planning Matters

Flood Risk

- 8.67 The site is located within Flood Zone 1. A Flood Risk assessment has been undertaken which concludes that the scheme is at low risk of flooding from all sources.
- 8.68 To ensure that the proposed scheme does not detrimentally affect surface water flood risk in its local drainage catchment a drainage strategy is proposed that will implement forms of SuDS which would reduce the run off from the site below existing run-off levels and below 5l/s/ha.
- 8.69 The Lead Local Flood Authority (LLFA) initially raised an objection to the originally proposed scheme which did not provide sufficient information to demonstrate that the proposal would not cause surface water drainage concerns. The drainage strategy has therefore been amended and the LLFA subsequently queried a number of the amendments which have now been further amended so that concerns have been overcome. The LLFA recommended that permission be granted subject to conditions, as included in the recommendation.

Energy Requirements

- 8.70 The applicant has submitted an Energy Statement and Sustainability Statement which outlines that sustainable design and energy management measures can be incorporated to meet the requirements of Policy SP6 and achieve a reduction in carbon emissions over Building Regulations 2013 by 35%. Energy use would be minimised through demand reduction and passive measures such as high levels of insulation and high efficiency glazing and the use of natural ventilation, with solar panels and other measures as required and controlled by a condition relating to detailed design.
- 8.71 A Low Emissions Strategy would be required with regards to emissions during construction and air quality and to ensure that vehicles generated by the development do not contribute significantly to air quality issues.

Community Infrastructure Levy

- 8.72 The development would be CIL liable. The levy amount has been calculated to ensure that the development contributes to meeting the need for physical and social infrastructure, including educational and healthcare facilities.

Conclusions

- 8.73 It is recommended that planning permission should be granted.
- 8.74 The scheme maximises the housing potential of the site (including the delivery of a high level of family housing and off-site affordable housing) without harming the character of the area and adequate mitigation by way of landscaping is proposed to accommodate the loss of a number of mature trees.
- 8.75 The proposal would have some limited impacts on residential amenity, but these are considered to be acceptable and not so significant as to warrant refusal of the scheme.
- 8.76 The levels of existing carparking in Longheath Garden are noted and the proposal would create additional parking areas to ensure that the predicted increases in parking demand can be adequately accommodated. Amended drawings were received during processing of the application to ensure that the parking arrangements were practical and well designed in a landscaped setting.
- 8.77 All other relevant policies and considerations, including equalities, have been taken into account.