

# PART 7. Planning Applications for Decision

# 1 SUMMARY OF APPLICATION DETAILS

Ref: 16/06512/FUL (Link to associated documents on the Planning Register)
Location: Parcels Of Land Adjacent To Auckland Rise, Church Road And Sylvan

LUI O L OFACODY

Hill, Croydon, SE19 2DX

Ward: South Norwood
Description: Demolition of build

three and five storeys in height comprising 29 two bedroom and 28 one bedroom flats. Provision of associated car parking, landscaping and other associated works (AMENDED PLANS RECEIVED - BLOCK F REMOVED, BLOCK B INCREASED IN HEIGHT BY 1 STOREY,

RETENTION OF A NUMBER OF TREES)

Drawing Nos: CBC\_NHB\_HTA\_A\_S2-28\_DR\_0020 (rev B), 0047 (rev B), 0090 (rev

B), 0110 (rev G), 114 (rev C), 0120 (rev C), 0200 (rev B), 0205, 0210 (rev C), 0211, 0215 (rev C), 0218 (rev -), 0220 (rev B), 0221 (rev B), 0225, 0226 (rev -), 0230 (rev B), 0235, 0240 (rev B), 0245, 0302, 0303, 0314, 0315, 0318, 0323, 0324, 0325, 0328 (rev -), 0329 (rev -), 0331, 0347, 0348, 0349, 0350, 0351, 0362, 0900 (rev C), 0901 (rev B)

(ALL rev A unless specified otherwise)

Applicant: Brick by Brick (Croydon) Ltd

Agent: Carter Jonas Ltd Case Officer: Richard Freeman

	1 bed	2 bed	3 bed
Houses			
Flats	28	29	

Number of car parking spaces	Number of cycle parking spaces		
65	87		

1.1 This application is being reported to Planning Committee because The Norwood Society made representations in accordance with the Committee Consideration Criteria and requested Planning Committee consideration and 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) 16/06508/FUL (Longheath Estate) 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 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) Restrictions on noise from air handling units
- 11) Contaminated land assessment to be submitted and approved
- 12) Retention of car (65 spaces) and cycle (73 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 had special regard to the desirability of preserving the settings of listed buildings and features of special architectural or historic interest as required by Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 2.4 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.
- 2.5 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 buildings and erection of six buildings to provide 57 residential units, with associated works and parking.
- 3.2 The buildings to be demolished comprise a dilapidated outbuilding previously used for maintenance storage; an outbuilding used as an estate office; three bin stores and two rows of garages to the west of 66-88 Sylvan Hill.
- 3.3 Block A a five storey "L" shaped flat-roofed building to the west of the site, near to the Church Road frontage. It would contain a total of 16 flats, including 9 x 1-bedroom 2-person flats, 1 x 2-bedroom 3-person flats and 6 x 2-bedroom 4-person flats. The building would be accessed from Church Road to the west and would sit adjacent to the existing blocks of flats and would turn the corner to enclose a communal landscaped area.
- 3.4 Amended plans have been received with regards to Block B which is now proposed as a five storey, rectangular, flat-roofed building to the north of the site close to Sylvan Hill, occupying the space where garages are proposed to be demolished. It would contain a total of 19 flats, 5 x 1-bedroom 2-person flats, 6 x 2-bedroom 3-person flats and 8 x 2-bedroom 4-person flats. This building would be accessed by vehicles along a spur from Sylvan Hill.
- 3.5 Building C comprises a pair of three storey infill street blocks, side-by-side and connected by a single storey link, slightly angled towards each other and fronting onto Auckland Rise. They would have a stepped flat-roof form and would contain 12 residential units; 4 x 1-bedroom 2-person flats and 8 x 2-bedroom 4-person flats.
- 3.6 Building D comprises a three storey, sloping flat-roofed, rectangular building which would front onto Auckland Rise, facing north and would contain 6 x 1-bedroom 2-person flats.
- 3.7 Building E comprises a four storey, flat-roofed, rectangular building. It would be located to the north east of the site, accessed along the spur off Sylvan Hill, facing north and would contain 4 x 1-bedroom 2-person flats.

- 3.8 Building F was proposed as 3 x 1-bedroom 2-person flats located towards the middle of the site, towards the top end of the Auckland Rise cul-de-sac. This has been deleted from the application following concerns raised by officers and local residents, primarily regarding the impact on high value trees. The overall unit numbers proposed has not changed due to amended plans received with regards to Block B.
- 3.9 Landscaping improvements around the blocks and to the estate in general are proposed, including the improvement of a pedestrian route running through the site, biodiverse planting and management regimes. Playable landscapes would be incorporated into the landscape, as well as a dedicated under-5's play-space and a 5-11's play-space to replace the existing under 8's play-space.
- 3.10 The amended scheme proposes the loss of 17 individual trees and one group of 11 trees (including 2 Category B trees) and replacement planting of 86 trees.
- 3.11 The development includes the provision of 65 car parking spaces, including 4 wheelchair spaces and 1 car club space, although it would result in the loss of 47 spaces. In other words, the schemes propose a net gain of 18 car parking spaces across the estate. 87 cycle parking spaces are proposed.
- 3.12 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 1000 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 as a whole, 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.
- 3.13 The affordable housing proposed is not balanced across all the sites within tranches and portfolios 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).
- 3.14 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 provide 38 residential units for market sale and 19 units of intermediate accommodation with other affordable housing being proposed on identified donor sites.
- 3.15 The planning consideration for the donor site arrangement is set out in greater detail below.

## Site and Surroundings

3.16 The area of the site forms an estate located off Church Road (a London Distributor Road), Sylvan Hill and Auckland Road (a Local Distributor Road). A spur of Sylvan Hill and Auckland Rise runs through the site. The site and general area slopes significantly, with Church Road being approximately 30 metres above Auckland Road. By the 1930's, frontage development had occurred onto Church Road, with the area forming

the bottom of the site being gardens and an allotment. Between 1953 and 1958, the estate was laid out and constructed in its current form, as a series of blocks addressing Auckland Rise (a loop road) and working with the existing topography to leave gaps between buildings set in an ample wooded setting. There are two predominant building forms, three and four storey linear blocks primarily at the bottom and top of the site and five storey point blocks situated within the centre of the estate. Since then, very little development of the site has occurred apart from the addition of some garages, parking areas and stores

- 3.17 The built form of the wider area follows a more formal layout, with blocks fronting onto roads generally being terraced or semi-detached. A number of larger scale developments have occurred at a similar date to when this estate was laid out, including the Stambourne Way which is noticeably denser. More modern development has also occurred; most noticeably a 3-10 storey flat development on Sylvan Hill and a two and three storey back-land development of modern flats behind 154-156 Church Road. The character of the wider area is also informed by areas of open space and woodland, including Beaulieu Heights woodland to the south of the site (designated as Local Open Land, a Site of Nature Conservation Importance and a Locally Listed Historic Park and Garden) and the smaller Oakland Wood to the north of the site (also designated as Local Open Land and a Site of Nature Conservation Importance).
- 3.18 There are several designated and non-designated heritage assets in the area. The site is effectively surrounded by the Church Road Conservation Area which proposed Block A would front onto. The Conservation Area Appraisal and Management Plan identifies the estate as not detracting from the conservation area. The Church of All Saints on Beulah Hill is a Grade II Listed Building. St John the Evangelist is a Grade II\* Listed Building, located at the junction of Auckland Road and Sylvan Hill, opposite the estate. The adjacent houses on Auckland Road are locally listed. Several buildings on Church Road are also locally listed, including:
  - Euro Queens Hotel (to the north of the site)
  - 215-217 Vicarage Court, Church Road (at the junction with Sylvan Hill, to the north of the site)
  - 271-279 (odds) Church Road (the row of houses immediately to the north of the estate)
  - 140-158 (evens) Church Road (the row of houses opposite the estate)
- 3.19 The site is in a predominantly residential area, although there are a number of commercial and community buildings on Church Road and Auckland Road. The Crystal Palace District Centre is located approximately a 12 minute walk to the north and a small shopping parade is 5 minutes to the south. The site has a Public Transport Accessibility Level of 2 (on a scale from 0 6), indicating poor connectivity, despite frequent bus services on Church Road and Auckland Road.

## **Planning History**

- 3.20 The estate which this site forms a part of has had very little development since it was originally laid out, and that which has occurred has been minor residential extensions and alterations which are not directly relevant to this proposal. In the wider area, the following planning decisions are of relevance:
  - 10/03778/P Erection of three storey building at rear comprising 11 flats & associated works, to the rear of 277-281 Church Road.

This permission for a three storey flat building of a modern appearance has been implemented and is to the north of the site.

12/03353/P Demolition of existing buildings; erection of 5/7 storey building comprising 80 bedroom supported accommodation and a 3/10 storey building comprising 48 flats and associated works at 8 Sylvan Hill

This permission is in the process of being implemented and is located to the north of proposed Block B

#### 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:
- 4.2 The proposed development would result in some change to the character of the area. However, significant areas of landscaping would still be retained on the estate and the proposed blocks would respect the character and appearance of the neighbouring conservation area. In some places, the development would add to the character of the area and form better defined spaces. Significant areas of Local Open Land beyond the site boundaries would be unaffected;
- 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;
- 4.4 The layout of development ensures that the proposal would not have a 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;
- 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 over 80 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 taken into account 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.
- 5.6 North Croydon Conservation Area Advisory Panel
- 5.7 NCCAAP made the following objection:
  - The site is in a historic area of architectural and historic interest
  - The dwelling mix is unacceptable
  - Insufficient affordable housing provision
  - The massing is unacceptable and impacts on views and outlook
  - The roof pitches and overall design are at odds with the character of the area
  - Loss of trees is unacceptable
  - The playspace would not be usable

#### 6 LOCAL REPRESENTATION

6.1 The application has been publicised by way of 13 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: 113 Objecting: 113 Supporting: 0

No of petitions received: 1 (objecting) Signatures 195

- 6.2 Following receipt of amended plans, the application was re-advertised. At the time of writing the report, three further representations were received confirming that existing objections to the proposal were still relevant and objecting to the increase in height of Block B and domineering over development.
- 6.3 Representations have been made from the following local groups/societies:
  - The Norwood Society
- 6.4 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

- Loss of visual amenity
- Adverse impact on open character of the area
- Overdevelopment and overcrowding
- · Loss of light, outlook and privacy to adjacent properties
- · Overbearing and dominating
- Additional noise 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
- · Parking stress survey is inaccurate
- 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
- 6.5 Councillor O'Connell made representations (objecting) which are summarised as follows:
  - The character of the area would be significantly changed
  - The mass is inappropriate, especially when taken cumulatively with other developments in the area
  - Mature trees and amenity space would be lost
  - Increase in traffic in already congested area
  - Increased pressure on 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
  - 7.8 Heritage assets and archaeology
  - 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 <u>Croydon Replacement Unitary Development Plan 2006 Saved Policies 2013 (UDP):</u>

- 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
- UC3 Development proposals in Conservation Areas
- UC9 Buildings on the Local List
- UC10 Historic Parks and Gardens
- 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 <u>CLP1.1 &CLP2</u>

• 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.
- 7.9 There are relevant adopted Conservation Area Appraisals and Management Plans as follows:
  - Church Road Conservation Area Appraisal and Management Plan

## 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, visual and heritage 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. These are of varying quality and utility, with site A being the largest and most open area. 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, generally on a significant slope. 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, including 5 areas of designated Local Open Land within 500m of the site. 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. The sloping nature of much of the site makes many areas difficult to use. In terms of j) the site is within a built-up area. The area immediately around the site generally consists of terraced buildings set within gardens and flats 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 local 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 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, 90m2 of under 5's space, 20m2 5-11's space and 10m2 12+ space should be provided. The proposal would provide a new 5-11's space which would well exceed the 20m2 requirement. An under 5's dedicated space would be provided as well as playable elements within the landscape, which would provide significantly more than 90m2. As such, this is considered to outweigh the lack of provision of 10m2 for 12+ year olds and is acceptable.
- 8.8 The proposal would result on the loss of several garages. These garages are not protected. Impact on highways and parking is discussed further below.
- 8.9 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 mix of urban and suburban characteristics. The policy therefore suggests that between 150 and 250 habitable rooms should be provided per hectare. The scheme contains 147 habitable rooms and has an area of approximately 1ha and so falls within this broad bracket. More specifically, the proposal of 57 units in an area of approximately a hectare falls towards the lower end of suburban densities in areas with a PTAL of 0-1, demonstrating that the density is not excessive. This approach is considered appropriate given the spacious characteristics of the existing estate.
- 8.10 All units are one or two bed flats and as such the proposal does not represent the best mix of unit sizes. However, 22 of the 57 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.
- 8.11 The principle of the proposed use is acceptable subject to other material considerations as addressed below.

# **Affordable Housing and Housing Mix**

- 8.12 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.
- 8.13 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.
- 8.14 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	

- 8.15 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 should be affordable rent accommodation and 42 should be shared ownership.
- 8.16 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).
- 8.17 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%	

- 8.18 The applicant has challenged a number of the 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.
- 8.19 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).

8.20 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

- 8.21 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).
- 8.22 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.
- 8.23 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. The Longheath scheme, which would provide most of the affordable units would have the units spread out throughout an estate and would include a good proportion of 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.
- 8.24 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.
- 8.25 It should also be noted that 19 units of shared ownership accommodation is proposed on site, which equates to 31% of the proposed units being delivered as affordable housing. As such, whilst the tenure mix does not accord with policy, this scheme would contribute affordable housing directly on site and would be a multi-tenure scheme, contributing to mixed and balanced communities.
- 8.26 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.
- 8.27 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, Visual and Heritage Impact

- 8.28 The overall estate layout is as a series of either linear flat blocks, at the bottom of the estate and addressing Church Road or as a series of point blocks, with significant spaces between the buildings including many mature, high quality trees. The overall character and appearance of the estate does not detract from the conservation area.
- 8.29 The proposed development in many ways follows this existing character in terms of the built form. Most buildings are three storey, the same as the existing linear flat blocks. The four storey Block A would be sited adjacent to an existing four storey building. Its ridge height would be somewhat higher but with the separation between the two buildings and the modern appearance, this would relate well to the adjacent building. The five storey Block B would be taller than the buildings on the estate nearest, but would be sited more than 18m from and at an angle to, that front elevation. As such, it would not create a sense of enclosure between the two buildings and it

would create a transition of scale to the taller building behind. The buildings would also have an inverted pitched roof. This would be significantly different from the traditional pitched roofs in the estate but this approach matches the modern design and appearance of the proposed blocks which, combined with the contrasting bricks, would add to the sense of character on the estate.

- 8.30 The detailed design of some elements, such as the frames to communal entrances, would reflect the detailing around inset balconies on existing blocks, whilst also complementing the modern appearance of the proposed buildings. The overall scale, massing and design of the blocks is considered appropriate for the area. Although the proposal allows much of the existing landscape to be retained, the cumulative impact of all blocks would result in a loss of some of the spacious character of the site. This is particularly the case at the entrances to the site from Church Road and Auckland Road which would result in some enclosure at these locations. There is however a rationale to providing a greater quantum of built form at the site entrances, which are nodal points and on main routes which generally have larger buildings. The proposal nevertheless retains the green character of the Auckland Road and Church Road frontages, which contribute to the character of the conservation area.
- 8.31 In more detail, Block A would continue the existing street rhythm to Church Road. The estate blocks to either side are L-shaped, which would be replicated, enclosing a shared amenity space which would provide for a greater sense of ownership for the surrounding blocks. The front elevation would be set slightly behind the adjacent building's front elevation, off-setting the increased height of the block in terms of dominance. The slight separation from the adjacent block allows the change in floor levels and thus window locations to be appropriate. The recesses to create balconies references the way in which the existing blocks turn corners with recessed corner sections. There is already a significant area of hardstanding at the front of the site and the increase and reconfiguring the parking would not change the appearance significantly. The screen of trees at the back of Church Road would not be affected by the proposal.
- 8.32 Block B would take the place of existing garages, located on an incline at the edge of the estate. The five storey massing would be taller than buildings on the estate apart from the more slender point blocks. It would however form a transition to the significantly taller building behind. It would be located 18m from and at an angle to the existing block on the opposite side of the Sylvan Road spur. The block would also follow the footprint and orientation of another adjacent block and so its siting and location would be appropriate for the area.
- 8.33 Block C would continue the urban form of the existing block to the east, which follows the route of Auckland Rise. This block would be set back from the street by a greater amount than the existing block, which would moderate the resulting sense of enclosure. The block works with the topography of the slope, stepping up the route and with a gap between the two elements where the building cranks round a bend. The massing is similar to the existing blocks adjacent, with a gap between the two elements which is comparable to the gap which would result from the existing building. This block and proposed Block D do create a more enclosed streetscene from Auckland Road than is currently the case. This better defines the route of Auckland Rise and is a very similar relationship to the road that the existing blocks have. The block locations build on the existing character of more development around the entrances to the estate and a more spacious centre.

- 8.34 Block D would be similar in massing terms to the existing three-storey block on the opposite side to Auckland Rise. Both buildings would have a similar relationship to the street and with each other, although with one having a more modern appearance. They would mark the entrance to the estate in an appropriate fashion. The rear elevation of Block D would be highly visible from Auckland Road and would add interest to the streetscene. The proposal would be at quite some distance from the listed church opposite and have a similar relationship to it as the existing building, albeit at a closer distance and so is not considered to have a significant impact on its setting.
- 8.35 Block E forms a small infill development between two three storey blocks. It would have a similar mass to each block, sitting just below the ridge height of the neighbouring building. This block would be opposite a taller five storey point block which would be 18m away and on the opposite side of Sylvan Hill. The massing and siting of the building is therefore appropriate.
- 8.36 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, townscape and heritage assets. It would lead to some change in the character of the area, with fewer spaces between buildings. This would however have an acceptable impact on the character and in some instances would improve it, resulting in a better sense of enclosure and marking of routes around the entrances. Towards the centre of the estate, large areas of space would remain and landscaping improvements and replacement tree planting would ensure that the areas which are retained would be of greater amenity value to residents. Therefore, whilst the character of the area would change to an extent, this change would be acceptable.

# **Residential Amenity**

# Block A

- 8.37 The block of flats to the north has no side facing windows. The front and rear building lines are similar to that property so no significant impact on light or outlook would occur. The block to the east is four storeys, of a similar height, with units being arranged with dual aspect to the front and rear. The block would present a blank flank elevation to part of this block at a distance of 11 metres. There are relationships of a similar separation distance on the estate, but these are flank walls to flank wall without principal room windows. This element of the proposal would have an impact on the outlook and light to the most southerly unit on each floor. These properties do however have exceptionally high levels of light and outlook to the rear, where living rooms are believed to be located. The reduction in outlook to the windows affected would be significant but given the current high levels and the availability of alternative aspect, this is considered acceptable.
- 8.38 The block would be 21m from the flats to the south, separated by an access and parking and some existing trees would be retained in front of that block. Given the separation distance and the front to front relationship this is not considered to significantly affect privacy or outlook. Some impact on light would occur although as the existing block is north facing it would be minimal.

## Block B

8.39 The block follows the footprint of the adjacent block to the south and abuts a flank wall. As such, the relationship with that block is acceptable. The block opposite, 66-88

Sylvan Hill would have adequate daylight and sunlight according to calculations against the BRE guidance. The blocks would be at least 18m apart with a front to front relationship across a vehicular route and so would not give rise to undue overlooking. Some noise and disturbance would occur from vehicles and residents accessing the properties but this is unlikely to lead to significant disturbance as the block would accommodate 18 units and replaces garages which are partially used. The relationship with the building under construction to the north is considered acceptable due to changes in level.

# Block C

8.40 Block C would follow the road adjacent to 2-24 Auckland Rise. Those properties have side facing windows at the front of the side elevation, which appear to be secondary windows to the room, with main windows on the front elevations. In any case, the proposed Block C would be set back from the street at this point to reduce impact on these windows. A condition can secure screens to the sides of balconies to ensure no detriment from overlooking. The building opposite would retain acceptable levels of light and outlook and would be separated by an existing road so no undue overlooking would occur.

## Block D

8.41 The location of this property is at approximately right angles to the existing building to the west. Some impact would occur to the windows nearest to the proposal. Given the orientation sufficient light and outlook to the south would be available and the private amenity space would not be affected in these matter. Some mutual degree of overlooking would occur at a distance of at least 11m, balcony to balcony but as this would be at an angle of at least 45degrees and as the existing balconies are very visible from communal areas the impact is considered to be acceptable.

# Block E

8.42 Side facing windows exist in each of the blocks adjacent to the proposal but these serve secondary rooms or circulation space, so the impact on light and outlook to those units is considered acceptable. The point block opposite would be 17m away and at an angle and retains sufficient daylight and sunlight against BRE standards. Some impact would occur on the view from those properties, but this is not protected in planning terms, the level of outlook would be acceptable given the separation distance and land levels.

# General site impact

- 8.43 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. Some additional parking areas are proposed, although these tend to either be close to where existing garages and forecourts were located or near to existing parking. Therefore, disturbance from vehicle movements is considered to not be likely to give rise to unacceptable levels of disturbance.
- 8.44 The development would have an impact on amenity from the open areas of the site but the landscaping and playspace improvements proposed are considered to

satisfactorily off-set this impact. The proposals would therefore have an acceptable impact on residential amenity of occupiers of the estate.

# **Living Conditions of Future Occupiers**

- 8.45 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.
- 8.46 The Daylight/Sunlight Report states that in terms of daylight, only one proposed room would not meet the criteria set out in the BRE guidance, so the development would have very good access to daylight. 24 of the main habitable non-bedrooms would fail sunlight criteria but when taken with the high levels of daylighting and availability of other rooms with good access to sunlight this is acceptable.
- 8.47 With regard to 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.
- 8.48 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

- 8.49 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: 20 car trips in the AM peak and 19 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.
- 8.50 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 Auckland Rise, Sylvan Hill and Church Road. Bin stores can be accessed from the public highway or in the same manner as the existing where bin lorries pull off the highway on to areas of hardstanding between blocks. Pedestrian access and footpaths would be retained through the site and would be improved. Reconfigured parking off Church Road and the other roads have all been demonstrated to provide adequate turning for the vehicles which would use them.

8.51 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**

- 8.52 The site is located within an area with a public transport accessibility level (PTAL) rating level of 1/2 which is considered to have poor access to local transport links. The site is however within a 12 minute walk from Upper Norwood District Centre, 1.5km from Crystal Palace Overground station and bus services operate on both Church Road and Auckland Road. As such, the connectivity is considered to be slightly better than the PTAL rating suggests.
- 8.53 There are 21 existing garages on site, to be removed. Of these, 12 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. 47 on and off street parking spaces would be lost to the development. The scheme proposes 57 additional residential units and Census data from the local area shows that households have on average 0.7 vehicles available to them, resulting in approximately 42 vehicles likely to result from the development.
- 8.54 Parking stress surveys have also been undertaken, which the applicant argues demonstrates that an average of 225 vehicle unrestricted vehicle parking spaces are available within 200m of the development at peak times. The proposal also includes the provision of 65 spaces. The applicant therefore argue that the proposal would result in the generation of demand for 89 spaces (42 new vehicles + 47 spaces lost). With 65 spaces proposed and an average of 225 spaces available on street, they consider that impact on parking would be negligible.
- 8.55 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 57 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).
- 8.56 Having considered the above information, officers have taken a more precautionary approach. Some of the garages could be used for parking of small cars and policy suggests a maximum of one space per unit. As such, the parking demand could be closer to 116 spaces (12 garages + 47 spaces lost + 57 new vehicles). Of the 225 spaces surveyed as being unoccupied, some would not be desirable to park in, including 38 on Church Road due to the busy nature of the road, 10 on Sylvan Hill which is often very crowded and 35 on Upper Beulah Hill which is not well surveyed at night. As such, whilst 225 spaces may be available, residents are more likely to wish to park in closer to 140 of the spaces. With the addition of the 56 new parking spaces within the site this does, however, demonstrate that even with a precautionary approach, the levels of parking potentially generated could be catered for in the estate and surrounding streets.

- 8.57 To manage this demand for parking the applicant proposes a Green Travel Plan to ensure that future residents are informed of sustainable travel options and to promote using public transport, car clubs and cycling. A car club space would also be provided. This is considered likely to reduce the level of trips by car which residents undertake and is in accordance with the aim of policy to promote sustainable travel. These measures would be secured as part of the future S.106 Agreement process.
- 8.58 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 86 spaces, plus two space for visitors. A condition is recommended to secure a total of 88 spaces in accordance with the above requirements.

# Trees and biodiversity

- 8.59 The Arboricultual Report identifies that there are 68 arboricultural items within the site area, comprising 58 individual trees, 9 groups and one stump. Officers consider that the character of the area is very much supported by the high quality trees on the site. The proposal would result in the loss of 18 trees and one group. Of the trees to be lost, all are graded "C" or "U" apart from two grade "B" trees. The group to be affected would be G36, located to the south of Block B. Whilst listed as individual trees of grade "C" officers consider that trees T15-T20, whilst correctly categorised as Grade "C" do form a group which adds to the character of the area.
- 8.60 Tree officers originally raised concerns about the loss of a specific tree on Site A, trees on Site C and on Site F. Amendments received addressed concerns with Sites A so that the mature tree in a planter would be retained. Concerns regarding the impact of Block F have been resolved by removing the proposed block from the scheme so these concerns have been overcome. Block C would still result in the loss of the group of Grade C trees. The impact of their loss would be ameliorated by the higher quality Group G22 behind, being retained. However, as a play area is proposed in this location and they would be near the rear elevation of Block C, a condition is recommended to control the construction of this area in accordance with details, including levels, to be agreed and to require replacement planting.
- 8.61 As well as tree loss, some development would occur within Root Protection Areas (RPAs) of 12 trees. This has been assessed and generally the incursions are minimal. Whilst some impact on T7, at the Auckland Road entrance to the site, would occur, this is considered to be acceptable as the incursion is small. A side elevation faces this tree so future pressure to remove the tree should be limited.
- 8.62 A replacement tree planting strategy has been provided, which indicates that 86 trees would be planted to replace the loss of 18 trees and one group. The planting strategy proposes species which support those found in the area and are proposed in locations to support belts of trees present on site. The overall approach of the strategy is accepted as is the amount of tree planting. Further refinement of the strategy is necessary to ensure that suitable species are proposed in the right locations, with ample space to grow. Officers consider that this can be secured by condition.
- 8.63 Overall, the proposal would lead to a loss of mature trees. Amended plans have been received which reduce the level of tree loss and retain more of the highest value trees. As such, with conditions to secure a detailed tree replacement strategy, coordinated with level changes and play areas and a further condition to ensure tree protection and building methodology approaches in RPAs, the impact on trees is acceptable.

8.64 An Ecological Assessment has been submitted with the application. It has identified one of the buildings to be demolished as housing a day-roost for a common bat species, which would require a license from Natural England to remove. An impact assessment has been carried out against Natural England standing advice and the impact of this loss is "medium". As such, replacement artificial habitats are considered to be appropriate and 12 bat roosts are proposed. A condition is recommended to require details of this and other replacement habitat and coordination with a detailed lighting strategy. As part of the landscaping strategy, biodiverse planting would be included to provide habitat improvements, including green roofs, meadow grassland planting, bird and bat nesting features, invertebrate hotels, brashpiles and "hogitats" (hedgehog homes).

# **Other Planning Matters**

#### Flood Risk

- 8.65 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.
- 8.66 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. Whilst there are some constraints on site, including the presence of significant trees, there is capacity for SuDS to be provided both at grade and beneath hardstanding.
- 8.67 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**

- 8.68 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.
- 8.69 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

8.70 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

- 8.71 It is recommended that planning permission should be granted.
- 8.72 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 visual amenities of the area, the setting of heritage assets or the residential amenities of the surrounding properties. Whilst the loss of landscaped spaces and mature trees is acknowledged, the scheme provides a new children's play space and retains wide green verges which would be enhanced by replacement trees and soft landscaping.
- 8.73 Whilst residents' concerns about parking and highway safety are noted, officers are satisfied that a robust Transport Assessment has been provided which demonstrates that there is adequate available on-street parking in the surrounding area and mitigation measures, including a new car-club space can be secured by condition.
- 8.74 All other relevant policies and considerations, including equalities, have been taken into account.