PART 6: Planning Applications for Decision

Item 6.2

1.0 SUMMARY OF APPLICATION DETAILS

Ref: 18/00812/FUL

Location: 80 Riddlesdown Road, Purley CR8 1DB

Ward: Purley Oaks and Riddlesdown

Description: Demolition of existing building: erection of a three storey building

comprising 6 x two bedroom, 2 x three bedroom and 1 x one bedroom flats: formation of associated vehicular access and provision of 9 parking spaces, cycle storage and refuse store.

Drawing Nos: BX30-S1-101; BX30-S1-102; BX30-S1-107; BX30-S1-109;

BX30-S1-110 uploaded on 16th February 2018 and BX30-S1-103A; BX30-S1-104B; BX30-S1-105B; BX30-S1-106A; BX30-S1-108A and BX30-S1-112A uploaded on the 25th September

2018-

Applicant: Mr Haris Constanti (Aventier Ltd)

Agent: N/A

Case Officer: Robert Naylor

	studio	1 bed	2 bed	3 bed	4 bed
Apartments	0	1 (2 person)	6 (3 person)	2 (4 person)	0

All units are proposed for private sale

Number of car parking spaces	Number of cycle parking spaces		
7 (including one disabled space)	18		

1.1 This application is being reported to committee because the Chair of committee and the ward councillors (Cllr Simon Brew and Cllr Simon Hoar) have made representation in accordance with the Committee Consideration Criteria and requested committee consideration. Furthermore, objections above the threshold in the Committee Consideration Criteria have been received.

2.0 RECOMMENDATION

- 2.1 That the Planning Committee resolve to GRANT planning permission
- 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. Development to be carried out in accordance with the approved drawings and reports except where specified by conditions
- 2. Materials to be submitted
- 3. Details of Cycles/Boundary/Electric vehicle charging point to be submitted
- 4. Car parking to be provided in accordance with details to be agreed
- 5. No additional windows in the flank elevations
- 6. Hard and soft landscaping to be submitted

- 7. 19% Carbon reduction
- 8. 110litre Water usage
- 9. Permeable forecourt material
- 10. Trees Accordance with the Arb Report
- 11. Tree Protection Plan
- 12. Inclusive access ground floor
- 13. Visibility Splays
- 14. Construction Logistics Plan to be submitted
- 15. In accordance with details of FRA
- 16. Protection of Archaeological Interest
- 17. Time limit of 3 years
- 18. Any other planning condition(s) considered necessary by the Director of Planning and Strategic Transport

Informatives

- 1) Community Infrastructure Levy
- 2) Code of practise for Construction Sites
- 3) Wildlife protection
- 4) Archaeological informative
- 5) Any other informative(s) considered necessary by the Director of Planning and Strategic Transport

3.0 PROPOSAL AND LOCATION DETAILS

- 3.1 The proposal includes the following:
 - Demolition of existing detached house
 - Erection of a three storey building including roofspace accommodation
 - Provision of 1 x one bedroom flat; 6 x two bedroom flats and 2 x three bedroom flats accessed via Riddlesdown Road.
 - Provision of 9 off-street spaces with associated access via Riddlesdown Road
 - Provision associated refuse/cycle stores



Figure 1: CGI image of the proposed development

3.2 The scheme has been amended during the application process with the Design Access and Transport Statement being updated and amended.

Site and Surroundings

3.3 The site is a large detached property located on the western side of Riddlesdown Road located within a uniquely shaped plot with the rear of the properties in Harman Place adjoining the site to the rear on the western boundary and the rear of the properties in Downs Road adjoining the site along the northern boundary.



Figure 2: Aerial street view highlighting the proposed site within the surrounding streetscene

- 3.4 The topography of the site is undulating with the property located at the top of a steep driveway and the rear garden set up significantly higher at the rear than at the front of the property.
- 3.5 The surrounding area is residential with properties on fairly generous plot sizes. There is no distinct style in regard to the properties along Riddlesdown Road, however the majority of properties along this section are single family dwellinghouses, with a number of schemes of flats as noted in the Planning History below.

Planning History

- 3.6 In terms of recent planning history the following applications are relevant:
 - Planning permission (Ref: 01/03334/P) was granted in March 2002 for the retention of vehicular access and provision of hardstanding.
 - Planning permission (Ref: 00/01622/P) was refused in August 2000 for the erection of detached three bedroom bungalow and detached garage; alterations to form shared vehicular access. The reason for refusal was that the development represented an overdevelopment of the site and would be out of character with the surrounding area by reason of its restricted plot size, poor residential environment and inadequate access arrangements resulting in the loss of a prominent raised landscaped area. The siting differs from the current scheme in that the development was located at the rear of the site adjoining the western boundary.
 - Planning permission (Ref: 86/02050/P) was granted in September 1986 Erection of detached double garage and formation of accessway.
 - Planning permission (Ref: 85/02346/P) planning permission was granted for the erection of detached house and new double garage in November 1985.
 - Planning permission (Ref: 84/00617/P) was approved in June 1984 for the erection of a detached double garage at the site.
- 3.7 Members will be aware that there are have been similar schemes from the same applicant submitted and approved at 96a and 122 Riddlesdown Road, which have been demolished, and building works are due to commence.

4.0 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The principle of the development is acceptable given the residential character of the surrounding area.
- The design and appearance of the development is appropriate
- The living conditions of adjoining occupiers would be protected from undue harm subject to conditions.
- The living standards of future occupiers are satisfactory and Nationally Described Space Standard (NDSS) compliant

- The level of parking and impact upon highway safety and efficiency is considered acceptable and can be controlled through conditions.
- Sustainability aspects can be controlled by conditions

5.0 CONSULTATION RESPONSE

5.1 The views of the Planning Service are expressed in the MATERIAL PLANNING CONSIDERATIONS section below.

6.0 LOCAL REPRESENTATION

6.1 The application has been publicised by 21 letters of notification to neighbouring properties in the vicinity of the application site. The number of representations received from neighbours, Chris Philp MP, local groups etc in response to notification and publicity of the application are as follows:

No of individual responses: 175 Objecting: 172 Supporting: 1 Comment: 2

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:

Objections

- Overdevelopment of the site due to its size, height, density, bulk and massing.
- Over-intensification of the out of character with the local area
- Density is out of character with nearby properties in the immediate vicinity
- Loss of garden space; vegetation and natural habitat
- Detrimental to the amenity of the residents of neighbouring properties due to overshadowing, overlooking and loss of privacy
- Impact on highway safety
- Lack of parking
- Impacts on flooding
- Impact of noise and disturbance
- Impact on the local wildlife
- Dangerous sloped access impacts on visibility
- No affordable housing [OFFICER COMMENT: The scheme is for 9 dwellings which
 is below the 10 unit threshold that would trigger an affordable housing contribution]
- Violation of Human Rights [OFFICER COMMENTS: Article 8 rights are a material planning consideration and have to be balanced against all other material considerations. Case law has highlighted that the planning system is an appropriate forum for householders within which they have rights to make representations to the LPA, and that real evidence is required that a development would harm private and family life.]
- Drawings are misleading and erroneous details [OFFICER COMMENT: The
 applicant has made a number of amendments to correct drafting errors and errors
 that have been highlighted throughout the application and officers are satisfied that
 the information received is adequate to enable the application to be considered or
 determined]
- Street perspective not correct following third party calculations [OFFICER COMMENT: The street perspective drawing has been created using Autodesk a

Building Information Modelling (BIM) system that is widely used by architects. The calculations have been taken from an alternative position and at a different head height, with the applicant's perspective taken from a greater distance and with another head height.]

- 6.3 The following procedural or non-material issues were raised in representations and are addressed below:
 - Restrictive covenants [OFFICER COMMENT: Restrictive covenants and planning applications operate independently of one another and not a material consideration. Private covenants prohibiting certain types of use is a civil matter and not in the remit of planning control]
 - Developer selling on sites for profit [OFFICER COMMENTS: This is not a material planning consideration and the Local Planning Authority (LPA) cannot control how a developer chooses to progress and finance sites.]
- 6.4 The following Councillors made representations:
 - Cllr Simon Brew (Purley and Woodcote Ward Councillor) NB: Made representations prior to the ward boundary changes.
 - Cllr Simon Hoar (Purley Oaks and Riddlesdown Councillor)
 - 1. Factual flaws, omissions & spelling mistakes in the documentation
 - 2. Overdevelopment of the site
 - 3. Overlooking and loss of privacy harmful to the neighbouring amenities
 - 4. Steepness of the slope inadequate for visibility splays
 - Cllr Paul Scott (Committee Chair)
 - 1. Potential to meet housing need through the provision of new homes in response to NPPF and London Plan housing targets
 - 2. Massing and design of the proposed building in relation to the character of the area.
 - 3. Impact on the amenities of neighbouring properties

7.0 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 2018 and the South London Waste Plan 2012.
- 7.2 Government Guidance is contained in the National Planning Policy Framework (NPPF), issued in July 2018. 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:
 - Promoting sustainable transport;

- Delivering a wide choice of high quality homes;
- Requiring good design.
- 7.3 The main policy considerations raised by the application that the Committee are required to consider are:

7.4 Consolidated London Plan 2015

- 3.3 Increasing housing supply
- 3.4 Optimising housing potential
- 3.5 Quality and design of housing developments
- 3.8 Housing choice
- 5.1 Climate change mitigation
- 5.2 Minimising carbon dioxide emissions
- 5.3 Sustainable design and construction
- 5.12 Flood risk management
- 5.13 Sustainable drainage
- 5.16 Waste net self sufficiency
- 6.3 Assessing effects of development on transport capacity
- 6.9 Cycling
- 6.13 Parking
- 7.2 An inclusive environment
- 7.3 Designing out crime
- 7.4 Local character
- 7.6 Architecture
- 7.21 Woodlands and trees

7.5 Croydon Local Plan 2018

- SP2 Homes
- SP6.3 Sustainable Design and Construction
- DM1 Housing choice for sustainable communities
- DM10 Design and character
- DM13 Refuse and recycling
- DM18 Heritage assets and conservation
- DM23 Development and construction
- DM28 Trees
- DM29 Promoting sustainable travel and reducing congestion
- DM30 Car and cycle parking in new development
- DM42 Purley

7.6 There is relevant Supplementary Planning Guidance as follows:

London Housing SPG March 2016

8.0 MATERIAL PLANNING CONSIDERATIONS

- 8.1 The main planning issues raised by the application that the Planning Committee are required are as follows:
 - 1. Principle of development

- 2. Townscape and visual impact
- 3. Housing quality for future occupiers
- 4. Residential amenity for neighbours
- 5. Access and parking
- 6. Sustainability and environment
- 7. Trees and landscaping
- 8. Archaeological Priority Zones
- 9. Other matters

Principle of Development

- 8.2 The London Plan and Croydon Local Plan identify appropriate use of land as a material consideration to ensure that opportunities for development are recognised and housing supply optimised. It is acknowledged that windfall schemes which provide sensitive renewal and intensification of existing residential areas play an important role in meeting demand for larger properties in the capital, helping to address overcrowding and affordability issues.
- 8.3 The application is for a flatted development providing additional high quality homes within the borough, which the Council is seeking to promote, and also provides 2 three bedroom family units, which the borough has an identified shortage of. The existing building is not protected by policies to retain small family dwellings and family accommodation is proposed. The site is located within an existing residential area and as such providing that the proposal respects the character and appearance of the surrounding area and there are no other impact issues the principle is supported.

Townscape and Visual Impact

- 8.4 There are a variety of house types and styles in the vicinity, including various bungalows, semi-detached and detached two storey properties with accommodation in the roofspace. Of note are two similar 9 unit schemes in Riddlesdown Road at numbers 96a and 122 where building works are due to commence. The Character Appraisal indicates that the area is made up of mainly detached houses on relatively large plots with similar relationship to each other and the street. There are minimal front boundaries which allow gardens to contribute to a generally green environment, although there are private driveways leading to a detached or integral garage and parking areas mean that on street parking is less of a problem than other housing types.
- 8.5 The application site occupies an unusually shaped plot, and the existing property is set significantly back from the street frontage and offset from the prevailing streetscene. The proposal seeks to utilise the existing orientations within the existing plot with the proposal extending the existing footprint and building lines of the current property, and thus set back from the street scene. Despite the setback the site is read from the street view taken along Riddlesdown Road and so is appropriate in relation to its appearance in the streetscene and surrounding area
- 8.6 Policy DM10.1 states that proposals should achieve a minimum height of 3 storeys, and the proposal is for a three storey building to be located at the site. The existing property is approximately 8.70m in height and the proposal would be approximately 10.0m which represents an increase in the height in comparison to the surrounding area. The development seeks to accommodate a third storey partially contained within

- the roof space to ensure the characteristic scale of the adjoining buildings and those along the street are maintained.
- 8.7 The scheme responds to surrounding roof forms and a second gabled end set at 90 degrees is introduced which creates visual interest. The L-shaped design is a significant increase in terms of scale and mass from the existing unit, however given the setback, the angle of the property site and the generous and somewhat unique nature of the plot size the position and scale of massing on the site sits comfortably on the plot. As such in terms of character and appearance the property would read more as a large detached house rather than a "block of flats" and would not appear out of keeping in the surrounding area.



Figure 3: Existing and proposed footprints and layouts (Not to a scale)

- 8.8 The design of the building has taken traditional elements from the surrounding area and incorporated them into the current scheme as a more modern interpretation. Whilst the proposal would be higher than the immediately neighbouring properties, the additional height would not dominate those adjoining properties. The design, scale and massing of the proposal positively responds to the character and appearance of the area, and would provide a building which would change and intensify the area but enhance the current appearance of the application site.
- 8.9 The setting ensures that the development does not appear overly cramped in its plot. Given the overall scale of the development and amount of existing hardstanding, the proposed extent would not be excessive. The site offers sufficient opportunities for soft landscaping to the rear and there are opportunities for planting on the Riddlesdown Road frontage. Conditions are recommended to carefully control the appearance of retaining walls from the front.



Figure 4: Existing and proposed street scene (Not to a scale)

- 8.10 Representations have raised concern over the intensification of the site and overdevelopment. The site is a suburban setting with a PTAL rating of 1b and as such the London Plan indicates that the density levels ranges of 150-200 habitable rooms per hectare (hr/ha) the proposal would be within this range at 168 hr/ha.
- 8.11 Representations have been made in respect to the scheme and whether the development constitutes "regeneration" as per the definitions contained in the Croydon plan, which state that "regeneration" is the "replacement of the existing buildings (including the replacement of detached or semi-detached houses with flats) with a development that increases the density and massing, within the broad parameters of the existing local character reflected in the form of buildings and street scene in particular." Table 6.5 highlights the range of local character types where "regeneration" would be acceptable and this includes "Detached Houses on Relatively Large Plots", which the existing property would be classed as.
- 8.12 Furthermore the Croydon plan indicates that the level of growth depends on existing local character. The capacity for natural evolution is dependent upon the local character typology, with the objective of the evolution of local character to achieve an intensification of use without major impacts on local character. Nevertheless each character type has capacity for growth. A sensitively designed three-storey scheme is considered to provide a more intensive use of the site in accordance with policy DM10.1 and is appropriate.
- 8.13 The scale and massing of the new build will respects the pattern and rhythm of neighbouring area, and would result in a high quality design. Having considered all of the above, against the backdrop of housing need, officers are of the opinion that the proposed development would comply with the objectives of the above policies in terms of respecting local character.

Housing Quality for Future Occupiers

8.14 All the units of the proposal would comply with internal dimensions required by the Nationally Described Space Standards NDSS, and are acceptable.

- 8.15 With regard to external amenity space, the London Housing SPG states that a minimum of 5sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1sqm for each additional unit. All the units have access to private amenity space in excess of minimum standards, and there is a significant amount of space proposed as communal gardens at the rear of the site. This could accommodate child play space (which can be conditioned).
- 8.16 In terms of accessibility, level access would be provided from the front door to the three ground floor units (which include the 2 x three bed the family units). London Plan states that developments of four stories or less require disabled unit provisions to be applied flexibly to ensure that the development is deliverable. Given the limitations of the footprint to provide the required accommodation, it is considered that one of the ground floor units should be M4(3) adaptable and the other two should be M4(2), this can be secured by condition. A disabled space is proposed for the parking area. Due to the levels of the site, level access is proposed from the carparking area but the pedestrian access to this area would be at approximately the existing access gradient. Consideration has been given to incorporating a pedestrian access ramp or changing the levels of the access, but this would have a significant impact on the streetscene, with the front area being dominated by the ramp, at the expense of landscaping and vehicular manoeuvring room. Local Plan policies require schemes to work sensitively with the current topography of a site. On balance, given the existing access arrangements, the number of units proposed and that level access from the hardstanding/car parking to the entrance to the building is proposed, this element of the scheme is considered acceptable. The vehicular access to the site is considered below.

Residential Amenity for Neighbours

8.17 There are a number of properties that adjoin the site which include 78A Riddlesdown Road to the north of the site; 80A Riddlesdown Road to the south of the site; the rear of 1-3 Harman Place to the southwest; the rear of properties in Downs Road, as highlighted in the figure below:



Figure 5: Ground floor plan highlighting the relationship with the adjoining occupiers. (Not to a scale)

78A Riddlesdown Road

8.18 The proposal would be located closer to the boundary with the property at 78A Riddlesdown Road beyond the rear building line, providing a deeper, taller and wider development than the existing property at the site. Despite projecting beyond a rear building line the development has been offset at an angle and this would be located behind a 45 degree angle, as such the scheme would pass the 45 degree BRE test for loss of light to the rear elevation windows. As such this would provide any significant loss of existing sunlight or daylight levels of adjoining occupiers. Given the set back and the angle of the scheme the flank wall has been designed to minimise visual intrusion from neighbouring property.



Figure 6: Existing and proposed relationship with 78A Riddlesdown Road

8.19 The scheme has been amended to remove the front balconies at the first and roof levels serving units 6 and 8 in order to minimise overlooking experienced at this property, however the projecting gabled bay is retained to further minimise any overlooking from the proposed windows. There are upper floor windows on the flank elevation of the proposal however they are angled away from the host property at 78A. Whilst there would be a degree of overlooking to the rear of the garden as a consequence of the side fenestration, this is not uncommon in a suburban location and is deemed acceptable to ensure no undue impact on the amenities of neighbouring properties.

80A Riddlesdown Road

- 8.20 The existing property is located approximately 3m from the boundary with 80A Riddlesdown Road and the proposal seeks to replicate that arrangement, with the proposal set along a similar building line. It is noted that the height of the proposal would be increased from the existing, however there are no flank windows at 80A that would be impacted through loss of light or visual impact.
- 8.21 The main effect would be experienced on the windows at the rear of the site. A daylight and sunlight diagram has been produced that demonstrates the impact of the development on the nearest residential properties including 80A Riddlesdown Road. Given the orientation of the scheme to the north-west of 80A and that that property would retain good outlook and light in a south-westerly direction and that there is a large tree between the properties that is to be retained, the proposed development would have only a minor to negligible impact on daylight and sunlight of the surrounding

- properties with windows and open spaces of neighbouring properties being unaffected or only marginally affected.
- 8.22 As stated above there are no upper floor flank windows at the adjoining property, and the proposal would have no upper floor windows in this elevation to mitigate actual or perceived levels of overlooking and loss of privacy. This would be an improvement on the existing position which has a number of upper floor windows fronting this elevation (as shown below):



Figure 7: Existing flank elevation and proposed flank elevation

8.23 It is acknowledged that the proposal would impact on this property but on balance, given the orientation, removal of existing windows, siting of existing building and landscaping treatment and use of landscaping conditions, the proposal is considered acceptable.

1-3 Harman Place

8.24 The separation between these properties and the proposal is in excess of 20m and there is a significant landscaped boundary (See figure below) located between these properties which will be retained and enhanced and can be secured by condition, this relationship is acceptable.





Figure 8: Boundary between site and Harman Place

Properties in Downs Road

8.25 There are windows in the upper floors of the existing house to be demolished that face the property, however it is acknowledged that the proposed scheme would have upper floor windows that are closer to the dwellings in Downs Road, albeit at an acute angle. Furthermore the separation between the properties in excess of 30m and there is significant landscaped boundary located between the application site and these properties which is to be retained and enhanced to ensures this relationship is acceptable.



Figure 9: Boundary between site proposal and Downs Road

8.26 Given that the proposal is for a residential use in a residential area the proposed development would not result in undue noise, light or air pollution from an increased number of occupants on the site. Subject to conditions the proposed development is not visually intrusive or result in a loss of privacy.

Access and Parking

8.30 The site is located within a PTAL of 1b which is poor. The London Plan sets out maximum car parking standards for residential developments based on public transport accessibility levels and local character. In Outer London areas with low PTAL (generally PTALs 0-1), boroughs should consider higher levels of provision which in this case would be 2 spaces per unit, although residential parking standards should be applied flexibly. The provision of 2 spaces is a maximum provision and a 1:1 ratio would

- be more in line with the London Plan and Croydon Plan to reduce the reliance on the car and meet with sustainability targets.
- 8.31 There are a number of representation that refer to the parking provision and highway safety at the site. In respect to highways safety, the scheme provides 9 off-street parking spaces these will need to adhere to the parking visibility splays and parking standards to ensure that safety requirements are adhered to and these have been secured through conditions. Despite anecdotal representations that there have been numerous accidents in the area, the road accident statistics indicate that since 2001 there have been nine road accents within a 200m radius of the site, with only four minor accidents on Riddlesdown Road itself. Given the proposal utilises the existing entrance, the network and transport impacts associated with the developments on traffic and transport would be negligible and it is unlikely to have a significant impact on highway safety.
- 8.32 The scheme provides 9 off-street parking spaces which would equate to a 1:1 provision in respect to the units proposed at the site. There is a large existing area of hardstanding on the frontage, and the proposal would have additional spaces, whilst allowing for some planting which can be secured through a condition. The parking layout and access arrangement permits access and exit movements in forward gear and would be acceptable subject to a condition providing the suitable visibility splays and as such would not harm the safety and efficiency of the highway network.
- 8.33 Furthermore, there is currently unrestricted on-street parking provision at the site, given that the site is located within a suburban residential area. The applicants have undertaken a parking stress survey which has used the Lambeth methodology, which highlighted that many dwellings enjoying large driveways with plenty of secure off road parking, thus reducing the demand for on-street parking. The parking survey indicates that the stress occupancy over the surveyed days ranged from 21% -25% respectively, which indicates that there would be sufficient on-street capacity to accommodate any potential overspill. A number of other flatted schemes have been approved which could make use of on-street parking. Even taking this in to account, it is considered that parking stress would be low to moderate.
- 8.34 The existing access to the site is via a steep vehicular slope into the site which was approved as part of a planning application in 2002. This existing situation is a material consideration but given the increase in units at the site it is considered reasonable that the gradient of the access is improved to meet Highways requirements. This is likely to be achieved through levelling out the slope of the carparking area and access ramp at the front of the site. A condition is recommended to secure full details of these works.
- 8.35 In compliance with the London Plan, electric vehicle charging points should be installed in the parking area and this can be secured by way of a condition. Cycle storage facilities would comply with the London Plan (which would require 18 spaces) as these are located within the footprint of the building and are therefore secure and undercover. However, consideration should be given to a more conventional layout with separate stands as it is sometimes difficult for wall stands to be used, as such further details will need to be secured by way of a condition.
- 8.36 Concerns have also been expressed in regard to the amount and type of excavation required at the site and further details are required as part of a construction method statement. A Demolition/Construction Logistic Plan (including a Construction

Management Plan) will be needed before commencement of work and this could be secured through a condition.

Environment, flooding and sustainability

- 8.37 Conditions can be attached to ensure that a 19% reduction in CO2 emissions over 2013 Building Regulations is achieved and mains water consumption would meet a target of 110 litres or less per head per day.
- 8.38 The applicants have submitted a Flood Risk Assessment (FRA) which based on a desktop study of underlying ground conditions, infiltration of surface water runoff following redevelopment may be feasible. To mitigate any residual risk of flooding, the FRA indicates that flood resilient construction techniques should be incorporated into the proposals and in order not exacerbate the risk of surface water flooding, surface water drainage arrangements for the redeveloped site should be in accordance with national and local policy requirements and should ensure that there is no increase in flows of surface water runoff when compared with the existing site.
- 8.39 Given the areas of hardstanding to be utilised as parking areas, permeable paving system should be incorporated as part of the scheme. This should accommodate surface water runoff from hardstanding areas in up to the 1 in 100 years plus 40% climate change event. This can be secured through a condition.

Trees and landscaping

- 8.40 There are no trees on site subject to a tree preservation order. However there are protected trees are situated at the rear of numbers 1, 2 & 3 Harman Place which adjoin the site along the rear south western Boundary. The trees are subject to 2 x TPO's referenced as; 76, 2008 & 23, 1973.
- 8.41 The applicants have submitted an Arboriculture Report and Impact Assessment which highlights that only three small category C trees and shrubs will be removed from the site, with the majority of the trees at the rear being retained to provide screening and also to mitigate impacts on the character. The landscaping scheme highlights that the proposal will provide a number of new trees along with shrubs and hedging will provide mitigation planting at the site. There are no arboriculture objections to the proposed development. However the applicant will need to submit a tree protection plan to ensure that the neighbouring trees be protected from harm during all phases of development. This has been conditioned.
- 8.42 The application site is not near an area of special scientific interest or a site of nature conservation value. During the officer's site visit, there is no evidence to suggest that any protected species are on site. With regard to additional wildlife concerns, it is recommended for an informative to be placed on the decision notice to advise the applicant to see the standing advice by Natural England in the event protected species are found on site.

Archaeological Priority Zones

- 8.43 The application site lies in an area of archaeological interest. The Greater London Archaeological Advisory Service (GLAAS) provides archaeological advice to boroughs in accordance with the National Planning Policy Framework and GLAAS Charter, and have been consulted as part of the application.
- 8.44 GLAAS have indicated that the appraisal of this application using the Greater London Historic Environment Record and information submitted indicates the need for field evaluation to determine appropriate mitigation. In this case, GLAAS have indicated that given the nature of the development, the archaeological interest and/or practical constraints are such that a condition could provide an acceptable safeguard. A condition has been attached requiring a two stage process of archaeological investigation comprising, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation.

Other matters

8.45 Representations have raised concerns that local schools and other services will be unable to cope with additional families moving into the area. The development will be liable for a charge under the Community Infrastructure Levy (CIL). This payment will contribute to delivering infrastructure to support the development of the area, such as local schools.

Conclusions

- 8.46 The principle of development is considered acceptable within this area. The design of the scheme is of an acceptable standard given the proposed and conditioned landscape and subject to the provision of suitable conditions the scheme is acceptable in relation to residential amenity, transport, sustainable and ecological matters. Thus the proposal is considered in general accordance with the relevant polices.
- 8.47 All other relevant policies and considerations, including equalities, have been taken into account.