

**1.0 APPLICATION DETAILS**

Ref: 19/03064/FUL  
 Location: 37 Woodmere Avenue, Croydon, CR0 7PJ  
 Ward: Shirley North  
 Description: Demolition of existing dwelling. Erection of two storey building (with roofspace accommodation) comprising 8 flats (1 x 3 bed, 4 x 2 bed and 3 x 1 bed) with associated car parking, private and communal amenity space and cycle and waste/recycling stores.  
 Drawing Nos: 306-001-100A (Received 01/07/2019), 306-001-101A (Received 01/07/2019), 306-001-201B (Received 01/07/2019), 306-001-202B (Received 01/07/2019), 306-001-203B (Received 01/07/2019), 306-001-204B (Received 01/07/2019), 306-001-205A (Received 01/07/2019), 306-001-206 (Received 01/07/2019), 306-001-300B (Received 01/07/2019), 306-001-301B (Received 01/07/2019), 306-001-302 (Received 01/07/2019), 306-001-303 (Received 01/07/2019), 306-001-304 (Received 01/07/2019), 306-001-305 (Received 01/07/2019), 306-001-400 (Received 01/07/2019), 306-001-500 (Received 01/07/2019)  
 Agent: Miss Valeene Preddie  
 Applicant: Mr James Simpson  
 Case Officer: Paul Young

	<b>studio</b>	<b>1 bed</b>	<b>2 bed</b>	<b>3 bed</b>	<b>4 bed (+)</b>
<b>Existing</b>				1	
<b>Proposed</b>		3	4	1	

*All units are proposed for private sale*

<b>Number of car parking spaces</b>	<b>Number of cycle parking spaces</b>
8	14

1.1 This application is being reported to committee because 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) Commencement time limit of 3 years
- 3) Details of external materials to be submitted
- 4) Submission of hard and soft landscaping plan including boundary treatment
- 5) Implementation and retention of Playspace area as per plans prior to occupation
- 6) Implementation of approved cycle parking prior to occupation of flats.
- 7) No Clear Glazing/openable windows above ground floor in Southern and Eastern elevations unless they are more than 1.7m above finished floor level
- 8) No additional windows along Southern and Eastern Elevations without Council approval
- 9) Privacy Screen to Southern facing second floor terrace
- 10) Access Road and car parking to be provided as shown
- 11) Visibility splays to be provided/retained
- 12) Submission of further details of electric vehicle charging points
- 13) Submission of Final Construction Logistics Plan
- 14) Requirement for 19% Carbon reduction and 110 litre Water usage
- 15) Details of site specific SUDS to be submitted
- 16) Minimum ground floor height levels
- 17) Fencing to be erected to divide private amenity areas prior to occupation
- 18) Implementation of waste/recycling areas prior to occupation of flats
- 19) Any other planning condition(s) considered necessary by the Director of Planning and Strategic Transport

#### INFORMATIVES

- 1) Community Infrastructure Levy
- 2) Advised to contact Council Highways Department to make arrangements for any works to the highway.
- 3) Any other informative(s) considered necessary by the Director of Planning and Strategic Transport

### 3.0 PROPOSAL AND LOCATION DETAILS

#### Proposal

3.1 The applicant seeks full planning permission for the:

- Demolition of existing 3 bedroom bungalow (with roofspace accommodation)
- Erection of 2 storey detached building (with roofspace accommodation) comprising 1 x 3, 5 x 2 and 2 x 1 bedroom flats with terrace/private amenity areas which would be split as follows:
  - 2 x 1 bedroom and 1 x 3 bedroom flats on the Ground Floor
  - 3 x 2 bedroom flats on the First Floor
  - 1 x 1 bedroom and 1 x 2 bedroom flats on the Second Floor
- Installation of a new vehicular access road from Tower Hill to provide a parking area containing 7 parking spaces (including 1 accessible space), with a further

parking space being provided via the existing vehicular crossover on Woodmere Road (8 parking spaces in total)

- Provision of cycle parking and waste/recycling facilities within proposed building on the ground floor

### Site and Surroundings

- 3.2 The application concerns an area of land, approximately 875m<sup>2</sup> (0.0875ha) in area, which lies on a corner plot between Tower View and Woodmere Avenue and which currently contains a single storey detached dwellinghouse with associated parking area and garden. The site is generally level, though on a wider scale there is a gentle slope upwards from North to South (towards Tower View)
- 3.3 The site is surrounded by predominantly detached residential properties ranging from single storey to 2.5 stories. The site has a 1 in 100 year risk of surface water flooding (medium) and has a Public Transport Accessibility Level (PTAL) of 1a (low). The site contains some small trees and vegetation, though none of these trees/vegetation are covered by Tree Preservation Orders (TPOs).
- 3.4 An aerial photo of the site is shown below:



## Planning History

3.5 The relevant planning history of the site is set out under the following table:

Reference	Description	Decision	Date
16/03640/P	Erection of detached two bedroom chalet bungalow at side; formation of vehicular access and provision of associated parking	Permission Refused	17/10/2016
08/01171/P	Erection of a three bedroom detached house; formation of vehicular access and provision of associated parking	Permission Refused  Appeal Dismissed	02/06/2008  05/01/2009

3.6 The most recent application (16/03640/P) proposed an additional dwelling adjacent to the existing bungalow (ie in addition to it), and was refused for the following two reasons:

- 1) *The siting and layout of the development would not respect or improve the existing pattern of buildings and the spaces between them and would appear a dominant and poorly designed element in the streetscene forward of the building line. The development would thereby be out of keeping with the character of the locality and harmful to the streetscene, conflicting with Policies UD2, UD3 and H2 of the Croydon Replacement Unitary Development Plan (The Croydon Plan 2006) Saved Policies 2013, policy SP4 of the Croydon Local Plan: Strategic Policies 2013 and policies 7.1, 7.4, 7.5 and 7.6 of the London Plan (consolidated with amendments since 2011)*
- 2) *The development would be detrimental to the amenities of the occupiers of the adjoining property by reason of loss of light, loss of outlook, visual intrusion and overbearing impact and would thereby conflict with Policy UD8 of the Croydon Replacement Unitary Development Plan (The Croydon Plan 2006) Saved Policies 2013, Policy 7.6 of the London Plan (consolidated with amendments since 2011)*

3.7 Note: since the above decision has been made, the Unitary Development Plan has been replaced with the 2018 Croydon Local Plan, and the Supplementary Planning Document: Suburban Design Guide (2019) has been adopted.

### Relevant Associated Planning History

3.8 There are a number of relevant planning application on nearby sites which are detailed below:

<b>Address and Reference</b>	<b>Description</b>	<b>Decision</b>	<b>Date</b>
32 Woodmere Avenue 19/00783/FUL	Demolition of the existing property and the erection of a replacement detached two storey building with accommodation in the roofspace, comprising 7 self-contained flats (2 x 1 bedroom, 3 x 2 bedroom and 2 x 3 bedroom) with 5 off street car parking spaces, bike store, integrated refuse store and site access (Amended Plans)	Permission Granted (with legal agreement)	09.07.2019
56 Woodmere Avenue 19/01352/FUL	Demolition of a single-family dwelling and erection of a 3- storey block containing 2 x 3-bedroom and 7 x 2-bedroom apartments with associated access, 9 parking spaces, cycle storage and refuse store (amended plans and description)	Pending decision – deferred at committee for design to be amended	N/A

3.9 56 Woodmere Avenue lies immediately opposite to the application site, whilst number 32 Woodmere lies less than 150m away. Both comprise corner plots similar to the application site.

#### **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, respecting the character of the surrounding area.
- Subject to conditions, the living conditions of adjoining occupiers would be protected from undue harm.
- The mix of accommodation is acceptable and living standards of future occupiers would comply with National, Regional and Local standards.
- Subject to the suggested conditions, the proposed access/layout, level of parking is acceptable and would not harm highway safety
- Subject to a suitable landscaping scheme (secured via condition), no harm would result to visual amenity or biodiversity.

- Subject to conditions, suitable sustainable energy, water and drainage measures can be secured.

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## 5.0 CONSULTATIONS

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

## 6.0 LOCAL REPRESENTATION

- 6.1 Neighbour notification: 13 local addresses were notified of the application by letter. Written objections have been received from 18 separate addresses.
- 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:

(Planning Related) <b>Objection</b>	<b>Officer comment</b>
<i>Design and appearance</i>	
Overdevelopment of the site	Addressed in Paragraphs 8.05 to 8.16 of this report.
Out of character/harmful to the area due to it bulk/siting and design	Addressed in Paragraphs 8.05 to 8.16 of this report.
<i>Impact on amenities of neighbouring properties</i>	
Loss of light, outlook and privacy to neighbouring properties	Addressed in Paragraphs 8.22 – 8.26 of this report
Extra pollution and noise	This is a residential development and there is no evidence or reason to suggest that the proposal would result in extra pollution or noise that is not associated with a residential area.
<i>Landscape/Trees</i>	
Loss of trees, vegetation and natural habitat (pond)	Addressed in paragraph 8.38 of this report.
<i>Transport and parking</i>	

Insufficient parking provision/No parking survey	Addressed in paragraphs 8.27-8.33 of this report
Adverse impact on highway safety	Addressed in paragraphs 8.27-8.33 of this report.
<i>Other matters</i>	
Strain on public services/infrastructure	If granted permission and implemented, the development would be liable for CIL payments and the units would generate Council Tax payments which could fund infrastructure/services.
Noise/disruption/dust/air pollution during construction	These matters would be addressed through a condition requiring a Construction Logistics Plan to be submitted

6.3 Note that a number of non-planning related concerns (eg loss of view, setting a precedent, loss of property value, etc) were also raised.

6.4 Monk Orchard Residents' Association: Object to the application, raising the following (summarised) planning related concerns:

- The proposed development would represent an overdevelopment of the site which would be out of character and would harm the appearance of the local area
- The proposed development would provide insufficient car parking and would increase parking pressures and harm highway safety
- The proposed development would harm the amenities of surrounding residents in terms of loss of light, loss of outlook, visual intrusion and overbearing impact.

## 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 2018 (CLP) and the South London Waste Plan 2012.

7.2 Government Guidance is contained in the National Planning Policy Framework (NPPF), issued in February 2019. 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.

7.3 The main planning Policies relevant in the assessment of this application are:

Consolidated London Plan 2016 (LP):

- 3.3 – Increasing Housing Supply
- 3.4 Optimising housing potential
- 3.5 Quality and design of housing developments
- 3.8 Housing choice
- 3.9 Mixed and balanced communities
- 3.14 – Existing Housing
- 5.1 Climate change mitigation
- 5.2 Minimising carbon dioxide emissions
- 5.3 Sustainable design and construction
- 5.7 Renewable energy
- 5.10 Urban greening
- 5.12 Flood risk management
- 5.13 Sustainable drainage
- 5.14 Water quality and wastewater infrastructure
- 5.15 Water use and supplies
- 5.16 Waste net self sufficiency
- 5.18 Construction, Demolition and excavation waste
- 6.3 Effects of development on transport capacity
- 6.9 Cycling
- 6.10 Walking
- 6.11 Smoothing traffic flow and tackling congestion
- 6.12 Road Network Capacity
- 6.13 - Parking
- 7.4 - Local Character
- 7.6 – Architecture
- 8.13 Community Infrastructure Levy

Croydon Local Plan 2018 (CLP):

- SP2 - Homes
- SP6.3 - Sustainable Design and Construction
- DM1 - Housing choice for sustainable communities
- SP4 – Urban Design and Local Character
- DM10 - Design and character
- DM13 - Refuse and recycling
- SP6 – Environment and Climate Change
- DM23 - Development and construction
- DM25 – Sustainable drainage systems and reducing floor risk
- DM27 – Biodiversity
- DM28 – Trees
- SP8 – Transport and communications
- DM29 - Promoting sustainable travel and reducing congestion
- DM30 - Car and cycle parking in new development

## Supplementary Planning Documents/Guidance

- London Housing SPG March 2016
- Croydon Suburban Design Guide Supplementary Planning Document April 2019

### **8.0 MATERIAL PLANNING CONSIDERATIONS**

8.1 The main planning issues relevant in the assessment of this application are as follows:

- Principle of development
- Townscape and visual impact
- Mix and quality of proposed accommodation
- Impact on amenities of surrounding residents
- Access, Parking and Highway Safety
- Sustainability and Flood Risk
- Biodiversity, Trees and Ecology
- Waste/Recycling Facilities

#### **Principle of development**

8.2 Paragraph 59 of the 2018 National Planning Policy Framework (NPPF) states that *“to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.”*

8.3 Similarly, 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.

8.4 Given the site is within an established residential area and currently comprises residential accommodation, the principle of proposing additional residential development on the site is therefore considered acceptable (and is indeed encouraged) by adopted planning policies and guidance.

#### **Townscape and visual impact**

- 8.5 In relation to density, Policy 3.4 of the London Plan indicates that in suburban areas with Public Transport Accessibility Levels (PTALs) of 0-1, an appropriate density equates to 150-200 habitable rooms per hectare (hr/ha).
- 8.6 The application proposes 22 habitable rooms on a site with an area of 0.0875ha, which equates to a density of 251hr/ha, which falls slightly above threshold (NOTE:A number of the representations submitted have incorrectly used number of future occupants (26) rather than number of habitable rooms (22) in their density calculations). Notwithstanding, the density of the development is still slightly higher than that recommended by Policy 3.4 of the London Plan.
- 8.7 However, it is noted that in the subtext of Policy 3.4 it states that a rigorous appreciation of housing density is crucial to realising the optimum potential of sites, but it is only the start of planning housing development, not the end. It is not appropriate to apply it (the density matrix) mechanistically.
- 8.8 Indeed, Policy DM1.1 of the 2018 Croydon Local Plan advises that developments should generally be a minimum of 3 stories, and in Paragraph 2.1 (pg 21) of the Council's SPD titled Suburban Residential Design (adopted in 2019), it indicates that where surrounding buildings are predominantly single storey, new development should seek to accommodate a third storey within the roof space, as highlighted in Fig 1 below:

Fig 1: Recommended Development Heights



Figure 2.10d: Where surrounding buildings are predominantly single storey, new development should seek to accommodate a third storey within the roof space.

- 8.9 Additionally, in section 2.14 of the 2019 SPD, it goes on to state that redevelopment of corner plots to provide new dwellings (including extensions or conversions) should seek to include an additional storey to the 3 storeys recommended in the Croydon Local Plan Policy DM10.1. It goes on to state that some corner plots may be able to accommodate further height provided the massing is responsive to neighbouring properties.
- 8.10 Taking all the above into consideration, and given the fact that the immediate areas predominantly comprises a mix of single storey and two storey dwellings, the proposed height and massing (at 2.5 stories) is considered acceptable.

8.11 In terms of its siting, the proposed development would generally respect the established building lines along both Tower View and Woodmere Avenue. It would be set back from the public highway (both roads) by at least 5.7m (at its closest point). As such, whilst it would be more visible than the existing dwelling, it would not appear unduly prominent or visually intrusive within the public streetscene. The siting of the building on the site is shown in Fig 2 below:

Fig 2: Proposed Site Plan



8.12 In relation to the local area, whilst the dwellings to the South (Tower Hill) are mostly single storey, those that lie opposite the site on Woodmere Avenue (numbers 52-62) are two stories in height and generally display hipped roof forms combined with dual pitched gable ended features (eg bay windows).

8.13 In terms of design, the development would comprise a 2.5 storey building which would externally have a comparable appearance to a large two storey detached dwelling (albeit with additional ground floor and first floor openings and balcony areas). It would be characterised by a predominantly hipped roof combined with 'catslide' and dual pitched gable ended roof forms. One small dormer, which is modest in scale, is also proposed in addition to a recessed roof 'cutout'. This variation in roof forms create visual interest, and a number of 'faux' windows and soldier brick courses would also break up the elevations further (see Fig 3 below).

8.14 Fig 3: Selected Elevations and CGIs of Proposed Development

A) Side Elevation (Facing 2b Tower Hill)



B) Front Elevation(s)



C) Side Elevation (Facing 39 Woodmere Avenue)



D) CGIs of proposed development

i) CGI looking SW from Woodmere Avenue



ii) View from 1 Tower View



8.15 In terms of materials, the proposed development would be predominantly be brick, with red tiling roof form, small areas of white render, combined with white UPVC windows/doors in addition to a stone plinth at the ground floor. Many of these materials would be similar to those on the existing dwelling and those that surround it. These materials would also generally comply with the guidance in the suburban design SPD (2019), and would not appear alien compared to the immediate surroundings. As such, no objections are raised.

8.16 It is noted that planning permission was granted at committee in July 2019 for a 2.5 storey flatted development which lies on a similar corner plot and less than 150m away (at 32 Woodmere Avenue). The approved streetscene elevation of the development is shown in Fig 4 below:

8.17 *Fig 4: Approved Streetscene elevation of development 19/00783/FUL at 32 Woodmere Avenue*



8.18 Given the assessment above, the proposed development is not considered to harm the character or appearance of the site or the surrounding area.

### **Mix and Quality of Accommodation Provided**

8.19 Policy DM1.2 states that the Council will permit the redevelopment of the residential units where it does not result in the net loss of 3 bedroom homes (as originally built) or the loss of homes smaller than 130m<sup>2</sup>. The application proposal would result in the demolition of the existing 3 bedroom bungalow, but would provide a 3 bedroom flat within the proposed development. As such, there would not be a net loss of 3 bedroom units, and so no conflict with Policy DM1.2 would occur. Additionally, the development would provide a number of 2b4p units, which could also be suitable for smaller families.

8.20 In relation to the quality of the accommodation provided, Policy 3.5 of the 2016 London Plan states that housing developments should be of the highest quality, internally, externally and in relation to their context and to the wider environment. The design of all new housing should enhance the quality of local places, taking into account physical context and local character. Policy 3.5 sets out minimum GIA standards for new residential developments.

8.21 In addition to the above, Policy DM10.4 of Croydon's local plan states that all proposals for new residential development will need to provide private amenity space that:

- Is of high quality design, and enhances and respects the local character;
- Provides functional space (the minimum width and depth of balconies should be 1.5m);
- Provides a minimum amount of private amenity space of 5m<sup>2</sup> per 1-2 person unit and an extra 1m<sup>2</sup> per extra occupant thereafter;
- All flatted development and developments of 10 or more houses must provide a minimum of 10m<sup>2</sup> per child of new play space, calculated using the Mayor of London's population yield calculator and as a set out in Table 6.2 below. The calculation will be based on all the equivalent of all units being for affordable or social rent unless as signed Section 106 Agreement states otherwise, or an agreement in principle has been reached by the point of determination of any planning application on the amount of affordable housing to be provided. When calculating the amount of private and communal open space to be provided, footpaths, driveways, front gardens, vehicle circulation areas, car and cycle parking areas and refuse areas should be excluded.

8.22 These standards are set out within table 6.2 within Policy DM10.4. A breakdown of the development in relation to GIA's and Amenity space requirements and provisions of the development are set out in the following table:

Unit No.	Unit Type	GIA		Private Amenity (PA) + Playspace (PS)	
		Required	Provided	Required	Provided
1	1b2p	50m2	50m <sup>2</sup>	5m2 of PA 0.3m2 of PS	24m2 of PA, 82m2 of PS
2	3b5p	86m2	89m2	8m2 of PA + 4.6m2 of PS	108m2 of PA, 82m2 of PS
3	1b2p	50m2	50m2	5m2 of PA, 0.3m2 of PS	29m2 of PA, 82m2 of PS
4	2b4p	70m2	70m2	7m2 of PA, 1.2m2 of PS	7.1m2 of PA, 82m2 of PS
5	2b4p	70m2	70m2	7m2 of PA, 1.2m2 of PS	7m2 of PA, 82m2 of PS
6	2b4p	70m2	71m2	7m2 of PA + 1.2m2 of PS	7m2 of PA 82m2 of PS
7	2b3p	61m2	76m2	6m2 of PA + 1.2m2 of PS	6m2 of PA, 82m2 of PS
8	1b2p	50m2	56m2	5m2 of PA + 0.3m2 of PS	5.5m2 of PA + 82m2 of PS

8.23 As highlighted in the table above, the proposed units would all meet or exceed the Policy requirements in terms of internal area, and private amenity space. Additionally, as well as private amenity space, a communal amenity/playspace area greater than 80m<sup>2</sup> in area would be provided. Similarly, all habitable rooms would be served by at least 1 natural light source, and all units (save for flat 8) would be (at least) dual aspect. Whilst flat 8 would be north facing and single aspect, it would compensate for this by having a larger GIA than that required by the London Plan. As such, in general the proposed development is considered to provide good quality accommodation for its intended occupants.

### **Impacts on Neighbouring Residential Amenity**

8.24 Policy DM10.6 of the Croydon Local Plan states that The Council will support proposals for development that ensure that;

- The amenity of the occupiers of adjoining buildings are protected; and that
- They do not result in direct overlooking at close range or habitable rooms in main rear or private elevations; and that
- They do not result in direct overlooking of private outdoor space (with the exception of communal open space) within 10m perpendicular to the rear elevation of a dwelling; and that
- Provide adequate sunlight and daylight to potential future occupants; and that
- They do not result in significant loss of existing sunlight or daylight levels of adjoining occupiers.

8.25 The application site shares a boundary number 2B Tower View to the South and number 39 Woodmere Avenue to the West.

8.26 Both numbers 2B Tower Hill and 39 Woodmere Avenue have a set of windows/glazed doors which face towards the application site. The glazed windows/doors serving number 39 do not appear to be a primary natural light source into a habitable room – the main natural light source is along the rear elevation of this property. Historic records indicate that there is a flank window serving 2B Tower Hill which serves a habitable room (likely a bedroom). However, this window is north facing and, given its orientation and the heavily vegetated boundary treatment between the two properties, it currently has a very limited light/outlook. The proposed building would be, at its closest point, around 2.46m from the shared boundary with 2B and around 4.67m from the habitable room window itself. Given this separation, and the fact that the proposed building would only have an eaves height of 3.3m at its closest point, it would not subtend a 25 degree line drawn from the centre of this window, and as such, would comply with the 25 degree rule set out in British Research Establishment (BRE) Guidelines. As a result, under the terms of these guidelines, it would maintain adequate sunlight/daylight to this occupier.

- 8.27 It is also noted that the proposed development, whilst adding an additional storey, would be at least 2.1m away from the shared boundaries with both these properties (at its closest point). As such, whilst there would be some increase in massing, it is considered that there would not be any undue material harm to the amenities of either neighbour in terms of loss of light or outlook.
- 8.28 Similarly, it would lie at least 25m away from the properties on the other side of the respective roads (Tower hill and Woodmere Avenue) and so would not compromise their amenities in terms of light or outlook or privacy.
- 8.29 In relation to privacy, the plans indicate that all the windows above ground floor level which face towards 2B Tower view and 39 Woodmere would be high level in order to prevent overlooking. A condition is recommended to ensure that no clear glazing or openable windows are present/inserted 1.7m above finished floor levels along these elevations. Additionally, a condition requiring privacy screening the south facing terrace serving flat 7 is also recommended to prevent overlooking into the garden of 2B Tower View. Subject to this, no conflict with Policy DM10.6 would arise and no material loss of privacy would result.

#### **Access, Parking and Highway Safety**

- 8.30 Policy SP8.16 of the Croydon Local Plan states that the Council and its partners will seek to limit parking spaces in the borough.
- 8.31 The London Plan states that for 1 and 2 bedroom units, a maximum 1 car parking space should be provided, and for 3 bedroom units a maximum of 1.5 spaces should be provided. As such, the requirement for this development would be a maximum of 8.5 car parking spaces.
- 8.32 The site has a PTAL of 1b (low). 8 car parking spaces are provided, which, whilst is a slight underprovision in relation to these *maximum* standards.
- 8.33 However, this would mean that the proposed would meet the objectives of Policy SP8.16 in reducing reliance of the car. Additionally, having undertaken desktop analysis and visited the site, it was noted that the immediate roads were generally free of parking restrictions and that there appeared to be good on-street capacity to accommodate any (slight) overspill.
- 8.34 As such, it is considered that the proposed parking provision is acceptable, and that a parking stress survey is not required. Additionally, Council Officers note the proposed access and parking layout would be acceptable and would not result in harm to highway or pedestrian safety.

- 8.35 However, no EV charging point provision has been shown on the plans, and so details of these will need to be secured via condition. Additionally, the applicant will need to engage with the Highways Department to undertake the works to the existing and proposed vehicle crossovers (on Woodmere Avenue and Tower Hill).
- 8.36 Finally, in relation to cycle parking, the London plan requires that 1 cycle parking space be provided for 1 bedroom units, and 2 for 2 bedroom plus units. This would equate to 14 spaces for the proposed development. 14 secure and covered cycle spaces are shown in an easily accessible ground floor cycle storage area which would meet these requirements.

### **Sustainability and Flood Risk**

- 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 site is located within an area some risk of surface water flooding and limited risk of groundwater flooding. As such, it is recommended that resilience measures be included, such as setting minimum floor levels.
- 8.39 Policy DM25 requires all development to incorporate sustainable drainage measures (SuDS) and the FRA outlines that SuDS measures should be installed. A condition requiring site specific SuDS measures is therefore recommended, alongside compliance with the other recommendations set out in the submitted flood risk assessment (FRA).

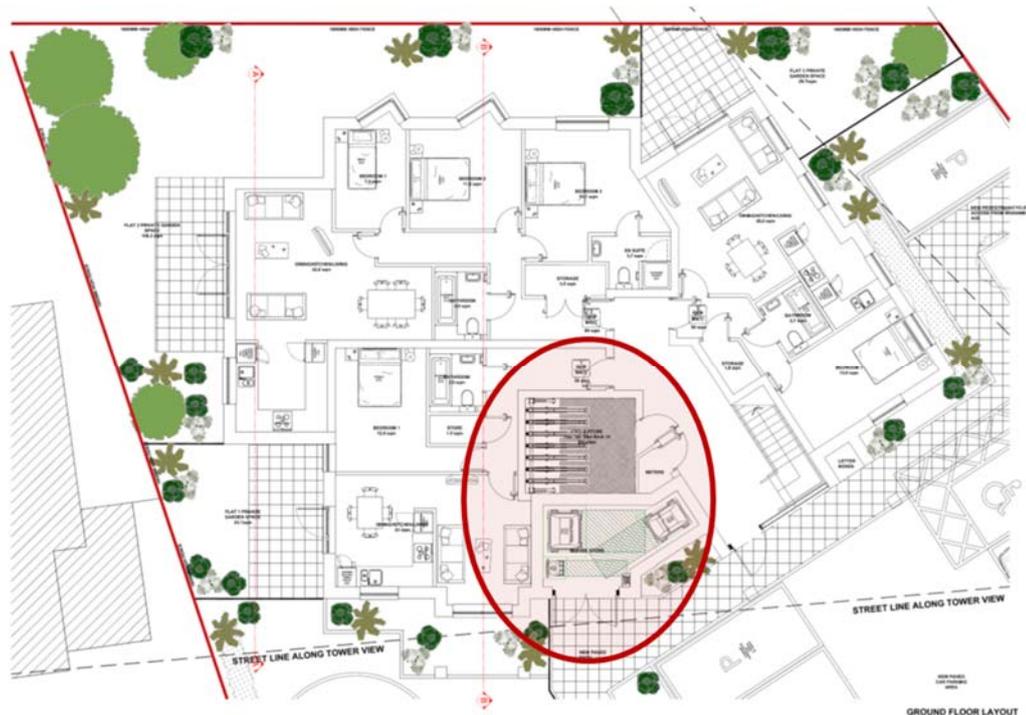
### **Biodiversity, Trees and Ecology**

- 8.40 A preliminary Ecological Appraisal has been submitted as part of the application which concludes that there is no evidence that there are any protected species on site, and that the site has very limited potential for any protected species in future. Similarly, there are no TPO'd trees on site and those that are on the site are of no particular value. It is therefore considered subject to suitable landscaping (secured via condition), that there would be limited to no harm to visual amenity, biodiversity or the wider environment.

### **Waste/Recycling Facilities**

- 8.41 The application proposes an internal waste storage area on the ground floor, as shown circled in Fig 4 below:

Fig 4 – Proposed Waste storage (and cycle parking) facilities on Ground Floor



8.42 The proposed waste storage area comply would be within 20m of the public highway and so would comply with the guidance set out in the Council's Suburban Design Guide (2019). The development is therefore considered acceptable in this regard.

### **Conclusion/Planning Balance**

8.43 The proposed development would provide an additional 7 residential units, with one (replacement) 3 bedroom unit, and 3 large 2 bedroom (small family) units. This adds weight in favour of the proposal. Subject to the recommended conditions, the development would not result in any material harm in terms of the character or appearance of the site or surrounding area, the amenities of surrounding residents, highway safety, biodiversity, flood risk or sustainability. Given that the development would provide benefits in the form of additional market housing, and that, subject to conditions, no material planning harm (individually or cumulatively) has been identified, the development is considered acceptable and is therefore recommended for approval.