

1.0 APPLICATION DETAILS

Ref: 20/00350/FUL
 Location: 170 Whitehorse Road
 Ward: Selhurst
 Description: Erection of a two storey building (with basement and roof space accommodation) comprising 8 flats on land adjacent to Tugela Road, together with associated amenity space, waste/cycle stores, and other works.
 Drawing Nos: PL09 Rev H (Received 22/06/2020), PL10 Rev H (Received 22/06/2020), PL10 Rev G (Received 20/04/2020), PL18 Rev C (Received 31/01/2020), PL13 Rev F (Received 20/04/2020), PL09 Rev G (Received 20/04/2020), PL15 Rev C (Received 20/04/2020), PL17 Rev C (Received 20/04/2020)
 Agent: None
 Applicant: Mr D Farrow
 Case Officer: Paul Young

	studio	1 bed	2 bed	3 bed	4 bed (+)
Existing	0	0	0	0	0
Proposed		1	4	3	

All units are proposed for private sale

Number of car parking spaces	Number of cycle parking spaces
1	17

1.1 This application is being reported to committee owing to the receipt of objection letters which number in excess of the threshold set out in the Croydon Constitution.

2.0 RECOMMENDATION

2.1 That the Planning Committee resolve to GRANT planning permission, subject to a S106 Legal Agreement:

- 1) Precluding future residents of the development from obtaining parking permits.
- 2) A financial contribution towards highway improvement measures.

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) Commencement time limit of 3 years
- 2) Development to be carried out in accordance with the approved drawings and reports except where specified by conditions
- 3) Samples of external materials to be submitted
- 4) Submission of hard and soft landscaping plan
- 5) No additional windows in any flank elevations above ground floor without consent
- 6) Details of boundary treatments and privacy screens to terrace areas (where applicable)
- 7) Submission of Construction Logistics Plan (CLP)
- 8) Submission of contamination 'verification' report
- 9) Requirement for 19% Carbon reduction and 110 litre Water usage (sustainability)
- 10) Details of site specific SUDS to be submitted
- 11) Implementation of waste/recycling facilities prior to occupation of units
- 12) Implementation of cycle parking facilities prior to occupation of units.
- 13) Any other planning condition(s) considered necessary by the Director of Planning and Strategic Transport

INFORMATIVES

- 1) Community Infrastructure Levy
- 2) Highway/Crossover Works
- 3) Compliance with Building/Fire Regulations
- 4) 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 following:

- Clearance of the existing site
- Erection of a 2.5/3 storey building with roofspace and lower ground/basement accommodation to provide 8 residential units (comprising 1 x 1 bed, 5 x 2 bed and 2 x 3 bed flats) complete with balcony/terrace areas and communal space.
- Excavation of part of the front rear of the site to provide for lower ground accommodation and private gardens/terraces to units 1 and 2.
- Provision of new boundary treatments, waste and cycle stores, pathways and other areas of hard and soft landscaping

Site and Surroundings

3.2 This application concerns an area of land (approximately 0.04 ha) in area situated on the western side of Tugela Road. This part of land originally formed part of a larger site known as 170 Whitehorse Road. This wider site is irregular

in shape and consists of a number of container units and open storage areas which have historically been in commercial use, principally for Use Class B1 (c) light industrial purposes, with associated office space and a workshop.

- 3.3 The remaining part of this site is in the process of being converted into residential units (understood to be the scheme approved in 19/04211/GPDO)
- 3.4 The site has a Public Transport Accessibility Level (PTAL) of 4 (good), and is lies within a Controlled Parking Zone (CPZ). It has a medium risk of surface water flooding (1 in 100 year).
- 3.5 The site is not characterised by any noticeable gradients/land slopes
- 3.6 A current aerial photo of the site (red outline is not 100% accurate) is shown below:



Planning History

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

Reference	Description	Decision	Date
49/102	Use of the building on site for light engineering purposes	Permission Granted	1949

89/02779/P	Retention of porta cabin for use as office	Permission Granted	13.11.1989
92/00046/P	Retention of porta cabin for use as office	Permission Refused	09.03.1992
95/00115/P	Re-siting of porta cabin for use as office	Permission Refused	20.03.1995
95/01288/E	Use of land and buildings for civil engineering	Certificate Granted	28.08.1995
19/00864/GPDO	Change of use from Light Industrial (B1c) to Residential (C3) to create 6 flats.	Prior Approval Granted	12.04.2019
19/02727/GPDO	Change of use from Light Industrial (B1c) to Residential (C3) to create 16 Flats	Permission Granted	02.08.2019
19/04019/FUL	Part demolition of existing building. Installation of external staircase, rooflights and roof inserts, external lighting, bin and cycle stores, car parking/manoeuvring area and landscaping/amenity space.	Permission Granted	18.10.2019
19/04211/GPDO	Change of use from Light Industrial (B1c) to Residential (C3) to create 13 Flats.	Prior Approval Granted	25.10.2019
19/05537/FUL	Part demolition of existing building. Installation of external staircase, rooflights and roof inserts, external lighting, cycle stores, car parking/manoeuvring area and landscaping/amenity space to facilitate change of use approved in 19/04211/GPDO.	Permission Granted	14.01.2020

3.8 As noted in the table above, there are a number of prior approvals for residential units in the existing buildings on the site and associated external alterations to facilitate these.

4.0 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The principle of the proposed residential (re)development is acceptable given that the use of the site has already been approved/changed under prior approvals 19/04211/GPDO, 19/00864/GPDO and 19/00864/GPDO

- The design and appearance of the development is of a suitably high quality, and would not harm 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/encouraged and living standards of future occupiers would comply with National, Regional and Local standards.
- Subject to the suggested conditions and legal agreement, the proposed development would not unduly increase parking pressure, would not harm highway safety and would not
- Subject to a suitable landscaping scheme (secured via conditions), the development would introduce additional green space and would not therefore harm biodiversity.
- Subject to conditions, suitable sustainable energy, water and drainage measures can be secured.

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: 33 local addresses have been notified. These addresses were re-notified by letter following amendments made to the plans on 20/04/2020. Written objections have been received from 20 different 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) Objection	Officer comment
<i>Design and appearance</i>	
Overdevelopment of the site	Addressed in Paragraphs 8.8-8.13 of this report.
Out of character/harmful to the area due to its bulk/siting and design	Addressed in Paragraphs 8.8-8.18 of this report.
<i>Impact on amenities of neighbouring properties</i>	
Loss of light, outlook and privacy to neighbouring properties	Addressed in Paragraphs 8.28-8.41 of this report
Change in access results in additional disturbance to Tugela Road residents	Addressed in Paragraph 8.53 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/Harm of trees, vegetation and natural habitat	Addressed in paragraph 8.48 of this report.
<i>Transport and parking</i>	
Insufficient parking provision	Addressed in paragraphs 8.42-8.44 of this report
Adverse impact on highway safety	Addressed in paragraphs 8.42-8.44 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.
Increase in Flood Risk	Addressed in paragraph 8.46-8.47 of this report
Disruption during Construction	A Construction management plan will be secured via planning condition

6.3 Note that a number of non-planning related concerns (eg impact on utilities, setting a precedent, loss of property value, conflict with land covenants etc) have also been raised.

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 (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
- 5.18 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 flood 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

Emerging London Plan

- 7.4 Whilst the emerging New London Plan is a material consideration, the weight afforded is down to the decision maker linked to the stage a plan has reached in its development. The Plan appears to be close to adoption and therefore, the New London Plan's weight has increased following on from the publication of the Panel Report and the London Mayor's publication of the Intend to Publish New London Plan. The Planning Inspectors' Panel Report accepted the need for London to deliver 66,000 new homes per annum (significantly higher than existing adopted targets), but questioned the London Plan's ability to deliver the level of housing predicted on "small sites" with insufficient evidence having been presented to the Examination to give confidence that the targets were realistic and/or achievable. This conclusion resulted in the Panel Report recommending a reduction in London's and Croydon's "small sites" target.
- 7.5 The Mayor in his Intend to Publish New London Plan has accepted the reduced Croydon's overall 10 year net housing figures from 29,490 to 20,790 homes, with the "small sites" reduced from 15,110 to 6,470 homes. Crucially, the lower windfall housing target for Croydon (641 homes a year) is not dissimilar to but slightly larger the current adopted 2018 Croydon Local Plan target of 592 homes on windfall sites each year.
- 7.6 It is important to note, that whilst the Secretary of State has not supported the Intend to Publish New London Plan, that the overall housing target in the New London Plan would be 2,079 new homes per annum (2019 – 2029) compared with 1,645 in the Croydon Local Plan 2018. Therefore, even with the possible reduction in the overall New London Plan housing targets, assuming it is adopted, Croydon will be required to deliver more new homes than our current Croydon Local Plan 2018 and current London Plan (incorporating alterations 2016) targets.
- 7.7 For clarity, the Croydon Local Plan 2018, current London Plan (incorporating alterations 2016) and South London Waste Plan 2012 remain the primary consideration when determining planning applications.

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 Until recently, the site known as 170 Whitehorse Road was owned and occupied by a small light industrial engineering company (M Flannery Construction Ltd), and so fell within a B1(c) use, and was designated as a Tier 4 “scattered employment site” within Policy SP3 of the 2018 Croydon Local Plan.

8.3 Policy SP3 offers protection to these type of sites for industrial uses, unless it can be demonstrated that:

- There is no demand (through marketing evidence)
- Residential use does not harm the wider location’s business function
- Opportunities for employment and skills training will be considered via Section 106 where applicable

8.4 However, recently the use of the site at 170 Whitehorse Road (including the area which forms part of this application fronting Tugela Road) has been subject to a number of applications which sought to change the use of the site from Light industrial to residential. These application have been approved under the Prior Approval system under references 19/04211/GPDO, 19/00864/GPDO and 19/00864/GPDO. The lawful use of the site is now therefore residential and there is no current conflict with Policy SP3.

8.5 In relation to the proposed additional residential units, 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.”*

- 8.6 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 overall demand and thus helping to address overcrowding and affordability issues.
- 8.7 Given the above, the principle of proposing residential development on the site is therefore considered acceptable (and is indeed encouraged) by adopted planning policies and guidance.

Townscape and visual impact

- 8.8 Policy SP4.1 of the 2018 Local Plan states that the Council will require development of a high quality, which respects and enhances Croydon's varied local character and contributes positively to public realm, landscape and townscape to create sustainable communities.
- 8.9 Similarly, Policy DM10.1 of the 2018 Local Plan states that proposals should be of high quality and, whilst seeking to achieve a minimum height of 3 storeys, should respect:
- a. The development pattern, layout and siting;
 - b. The scale, height, massing, and density;
 - c. The appearance, existing materials and built and natural features of the surrounding area; the Place of Croydon in which it is located.
- 8.10 In relation to density, Policy 3.4 of the London Plan indicates that in urban areas with PTALs of 4-6, an appropriate density equates to between 200–700 habitable rooms per hectare (hr/ha).
- 8.11 The proposed development would provide 26 habitable rooms on a site of 0.04ha, which equates to a density of around 650 hr/ha. This lies within this density range and as such, the proposal is not considered to represent an overdevelopment of the site.
- 8.12 Looking at the wider site, and taking on board the 16 unit scheme approved in 19/02727/GPDO, there would be a maximum provision of around 58 habitable rooms on a site area of 0.144ha. This would equate to a density of around 403 hr/ha, which again would fall within the recommended density range within the London Plan.
- 8.13 In terms of overall bulk and scale, it would be slightly taller in height than the terraced dwellings at either side (numbers 13 and 23). However, it would maintain at least a 1.7m visual gap from these dwellings which would ensure that this slight raise in height would not appear unduly prominent within the streetscene, whilst still meeting the 3 storey minimum requirement of Policy

DM10.1. Similarly, the proposed development would respect the established building along this side of Tugela Road. Part of the proposed site plan of the development is shown below:



8.14 In terms of design, the design approach taken for the proposed development is considered be a contemporary reinterpretation approach. The building has two distinct front and rear facades, both which combine some more traditional forms and materials (such as dual pitched gable ended roof forms and stock bricks) with more contemporary materials and forms (such as projecting bays, steel panels, zinc cladding, louvred roof forms and irregularly shaped fenestration). The proposed front (Tugela) and rear (Whitehorse) elevations are below:



8.15 The overall approach has similarities to that shown/encouraged on page 86 of the Council's 2019 SPD (pasted below)



8.16 It is noted that the proposal would result in lightwells fronting onto Tugela Road. Whilst these would not be common features, they would reflect the more modern character/design of the terrace, and they would not be unduly large or

visually intrusive within the streetscene, in line with the guidance set out in the Suburban Residential Design SPD (2019).

- 8.17 In general, the proposed design is considered to be of a good quality and in compliance with adopted policies and guidance.
- 8.18 Given the assessment above, and subject to the attached conditions, the application 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 SP2.7 of the 2018 Local Plan states that the Council will seek to ensure that a choice of homes is available in the borough that will address the borough's need for homes of different sizes, particularly for small family units. For both market and affordable housing, the Council strategic target for 30% of all new homes up to 2036 to have three or more bedrooms.
- 8.20 3 of the 8 units would be 3 bedroom units, which would equate to 37.5%, which exceeds this target. It is also noted that the development would provide 2 x 2 bed, 4 person units which could also accommodate small families (as well as 3 x 2b 3p units). As such, the development would provide a good mix of accommodation, and a large number of small family units, which adds some weight in favour of the proposal.
- 8.21 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. It indicates that 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.
- 8.22 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 5m² per 1-2 person unit and an extra 1m² per extra occupant thereafter;
- All flatted development and developments of 10 or more houses must provide a minimum of 10m² 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.

8.23 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)	
		Required (m ²)	Provided (m ²)	Required (m ²)	Provided (m ²)
1	3b5p	86	100	8	24
2	2b4p	70	80	7	23
3	2b3p	61	67	6	6
4	3b4p	74	74	7	7
5	3b4p	74	75	7	8
6	2b4p	70	71	7	7
7	1b2p	50	52	5	6
8	2b3p	61	65	6	6

8.24 The proposed development would generally meet the standards, and would also provide nearly 70m² of communal space for the residents.

8.25 In relation to the basement units (numbers 1 and 2), the Suburban Residential Design SPD (2019) sets out guidance for the preservation of adequate daylight/sunlight for habitable rooms as shown below

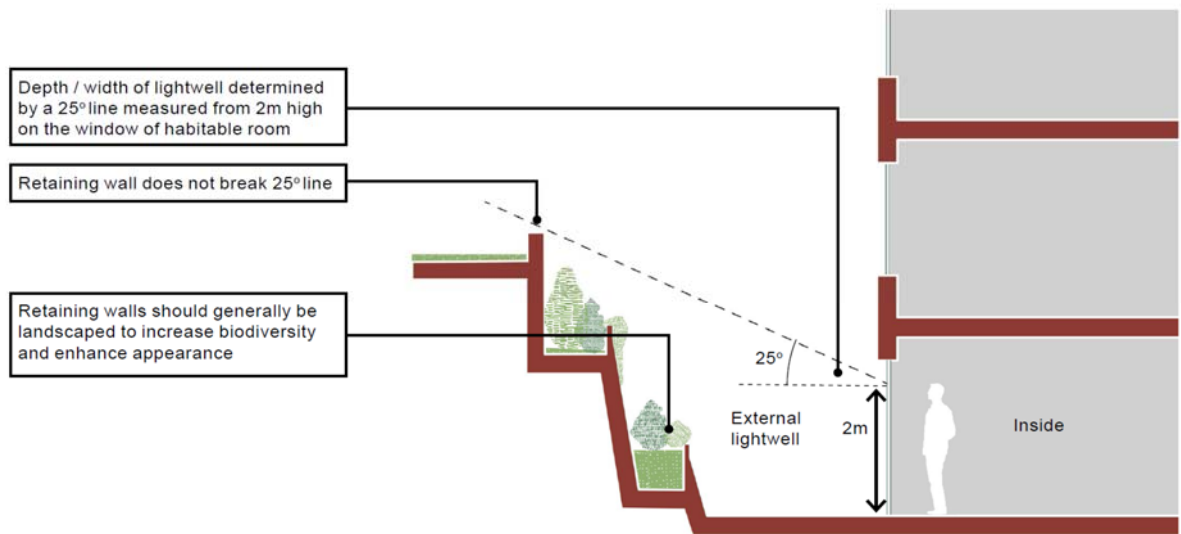
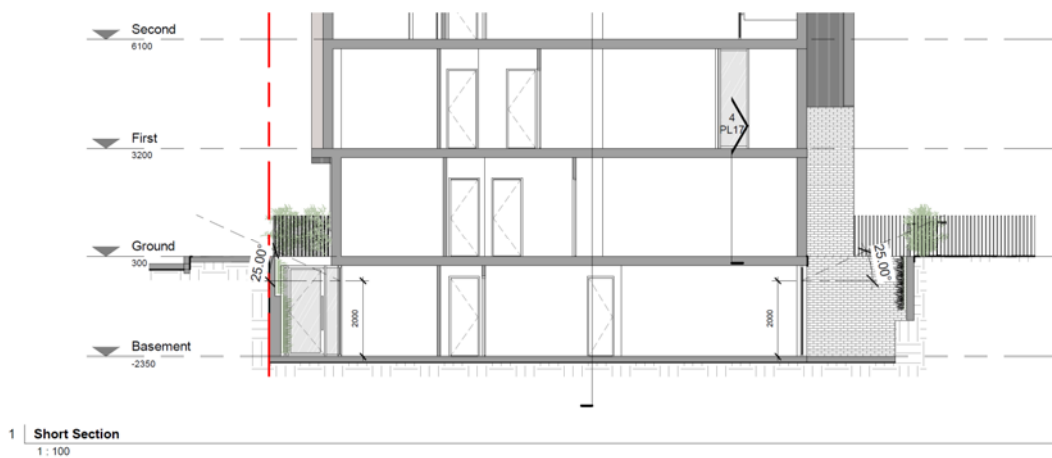


Figure 2.20c: Section showing the design guidance for creating a light well for a basement or lower-ground floor.

8.26 The proposed development would comply with the 25 degree line as shown in the proposed sections below. Additionally, it is noted that these units would have notably greater GIAs and Private Amenity areas are notably in excess of Policy standards.



8.27 As such, in general, the proposed accommodation is considered to be of a good standard and no conflicts with adopted policy or guidance are identified.

Impacts on Neighbouring Residential Amenity

8.28 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.

8.29 The nearest properties to the proposed building are numbers 13 and 23 Tugela Road, both two storey end of terrace dwellings. Number 13 displays a rear dormer roof extension and has a single storey extension which extends along the shared boundary with the application site.

8.30 The applicant has submitted a British Research Establishment (BRE) Sunlight and Daylight assessment which assesses the impacts of the development on the nearby occupiers.

Vertical Sky Component (VSC)

8.31 According to BRE guidance, dwellings lit by windows with a VSC of less than 27% or less than 0.8 times its former value are likely to appear more gloomy and electric light will be needed more of the time.

8.32 All windows pass VSC guidelines save for 3 ground floor flank windows serving number 23 Tugela Road. However, it is noted that the test only measures light falling on a single point, and therefore does not take into account the size of a window or the benefit of other windows serving the same room. In this case, whilst there are no up to date ground floor plans for number 23, plans of the surrounding terraced dwellings indicate that these windows likely serve a kitchen and WC/bathroom area (ie non-habitable rooms).

8.33 The VSC test also does not consider the size or the room any window serves. Therefore the following Daylight Distribution/No Sky Line is considered to be a better indicator of the impact in this case

Daylight Distribution/No Sky Line (NSL)

- 8.34 When comparing existing buildings against that proposed following development, British Research Establishment (BRE) guidelines state that if the no-sky line moves so that the area of the existing room which does receive direct skylight is reduced to less than 0.8 times its former value, then this will be noticeable to the occupants, and more of the room will appear poorly lit.
- 8.35 The submitted BRE assessment indicates that all the neighbouring windows would pass.

Annual Probable Sunlight Hours (APSH)

- 8.36 Annual probable sunlight hours (APSH) is a measure of sunlight that a given window may expect over a year period. BRE guidance recommends that the APSH received at a given window in the proposed case should be at least 25% of the total available, including at least 5% in winter. Where the proposed values fall short of these, and the loss is greater than 4%, then the proposed values should not be less than 0.8 times their previous value in each period.
- 8.37 The submitted BRE assessment indicates that all windows pass, save for a single flank facing ground floor window serving number 23 Tugela. However, this would only be during winter time, and as noted in the VSC section, this appears to be one of two windows serving a kitchen area (a non-habitable room). The other window serving this room would pass, and so overall it is considered that there would be no material harm.
- 8.38 Overall, given the above, it is considered that there would be no undue/material harm to neighbouring amenities in terms of daylight or sunlight.

- 8.39 In terms of overlooking/privacy, there are no opportunities for direct overlooking into habitable room windows serving either numbers 13 or 23, but conditions requiring privacy screens for some of the amenity areas are recommended where overlooking could potentially occur. To the rear (west), the rears of the properties along Whitehorse Road would be at least 30m away, which is far in excess of the 18m minimum distance set out in the Council's 2019 SPD (Suburban Residential Development) and so no material harm would result. Some additional windows facing the properties opposite on Tugela Road (numbers 6-14) would be introduced, but this reflects the established/existing distance/relationships between the two facing sets of terraces and so is deemed acceptable
- 8.40 The proposed development would introduce additional activity and lighting in and around the site. However, this activity would be residential in nature, within a residential area, and adopted planning policies and guidance encourage intensification of residential use in principle (subject to a full planning assessment). As such, it is not considered to result in undue harm in this regard.

Access, Parking and Highway Safety

- 8.41 Policy SP8.15 of the Croydon Local Plan states that the Council will encourage car free development in Centres, where there are high levels of PTAL and when a critical mass of development enables viable alternatives, such as car clubs (while still providing for disabled people). Detailed car parking standards are contained within the Croydon Local Plan's Detailed Policies and Proposals.
- 8.42 The site has a Public Transport Accessibility Level (PTAL) of 4 (good), and the site lies within a Controlled Parking Zone (CPZ). One accessible parking space is proposed to the rear of the site, accessed from the existing vehicular access in Whitehorse Road. Whilst this would be an under provision of parking, the applicant has agreed to sign a Unilateral Undertaking to preclude future residents of the development from applying for car parking permits, and as such, they would not be able to park in neighbouring roads. As such, subject to this, no increase in parking pressures within surrounding roads would result from the development.
- 8.43 In terms of cycle parking, the London plan would require 15 secure and covered cycle parking spaces for the proposed development (1 space for the 1 bed unit, 2 spaces for the other units). Space for 17 bicycles would be provided in excess of these standards in a secure cycle storage area. As such, no conflicts with adopted Policy would occur.

Sustainability and Flood Risk

- 8.44 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.
- 8.45 The site is located within a critical surface water flooding area. Policy DM25 requires all development to incorporate sustainable drainage measures (SuDS).
- 8.46 It is noted that the site currently consists of impermeable hardstanding. The proposed development would introduce some new (permeable) green space to the rear. This, combined with a condition requiring additional site specific SuDS measures (eg rainwater collection/recycling, green roofs/walls etc) and a suitable soft landscaping scheme should result in a (limited) reduction in terms of surface water flood risk in the local area. As such, there would be no conflict with adopted Policy.

Trees, Biodiversity and Ecology

- 8.47 No materially significant trees/vegetation lies on or close to the proposed development, but there are some in reasonable proximity (such as the nearby street tree on Tugela road) which would need to be protected during construction (which can be secured in a condition requiring a CMP). The proposed site does also allow for some limited planting and soft landscaping, the fine details of which can be secured via condition.

Waste/Recycling Facilities

- 8.48 The guidance set out in the Council's Suburban Design Guide (2019) advises that waste storage areas should be within 30m of the entrance of each residential units and within 20m of the public highway.
- 8.49 The application proposes a secure and covered waste storage area close to the entrance to the site (well within the 20m distance) which is of a suitable size to accommodate the development.

Contamination

- 8.50 The applicant has submitted a site investigation/contamination report in relation to the site. This sets out a number of recommendations, such as a clean cover system for the private gardens and areas of soft landscaping, protection of incoming water supply pipes, gas protection measures achieving 3.5 points of protection (in accordance with BS8485) in all buildings and vapour protection measures etc. It is noted that similar contamination reports were submitted as part of the GPDO approvals on the site.
- 8.51 As such, a condition requiring a validation report requiring evidence of all remedial works (as recommended by the submitted Phase II site investigation report) that have been carried out is recommended. Subject to this, no issues are raised.

Other matters

- 8.52 Concerns have been raised in submitted neighbour representations about the proposed access (which has been changed during the course of the application from Whitehorse Road to Tugela Road). The original access/layout (from Whitehorse) did not comply with the Council's waste collection requirements and so would not have been deemed acceptable. Additionally, this access would have led to greater direct overlooking of a number of habitable room windows to the rear on the ground and first floors of the building, in addition to their private amenity areas, as well as a reduced (and less secure) communal amenity area. It therefore resulted in a much poorer quality of accommodation for the occupants. Finally, the new layout allows for 2 x accessible units to be provided on the ground floor.

Conclusion/Planning Balance

- 8.53 The proposed development would provide 8 new residential units, a large percentage of which would be suitable for small families. It also would result in a decrease in the level of hardstanding coverage with an increase in permeable/semi – permeable surfacing and therefore some minor reduction in surface water flood risk. Together, this adds a fair amount of 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, biodiversity, flood risk or sustainability. As such, the development is considered acceptable and is therefore recommended for approval.