

1.0 SUMMARY OF APPLICATION DETAILS

Ref: 20/01330/FUL
 Location: Amenity Land, Junction of Crescent Way and Covington Way, Norbury, SW16 3AH
 Ward: Norbury Park
 Description: Partial development of green space to provide a part three, part four storey building comprising 9 residential units (Use Class C3) together with associated landscaping treatments, car parking and enhancements to existing green space.
 Drawing Nos: 5879-201, 616_201_E002 Rev B, E004 Rev B, P001 Rev C, P002 Rev D, P003 Rev F, P004 Rev D, P005 Rev D, P006 Rev C, P007 Rev D, SK031 Rev C, P010 Rev C, P020 Rev C, P021 Rev D and Tree Protection Plan dated 25th February 2020.
 Applicant: Brick by Brick Croydon Limited
 Agent: Carter Jonas
 Case Officer: Scott Schimanski

	1B2P	2B3P	2B4P	Total
Existing				0
Market	1	3	2	6
Shared Ownership	3			3
Total	4	3	2	9

Number of car parking spaces	Number of cycle parking spaces
5 on site	18 (two spaces per apartment)

1.1 This application is being reported to Planning Committee because objections above the threshold in the Committee Consideration Criteria have been received and the Vice-Chair of Planning Committee (Councillor Paul Scott) made representations in accordance with the Committee Consideration Criteria and requested committee consideration.

2.0 RECOMMENDATION

- 2.1 That the Planning Committee resolve to GRANT planning permission prior to the completion of a legal agreement to secure the following:
- a) Delivery of 3x1 bed apartments as shared ownership units
 - b) Highways agreement for highway works to include (but not limited to) deliver yellow lines at the junction of Covington Way and Crescent Way, new access points, relocated servicing access and removal of existing, as well as making good any damage
 - c) Extinguishment of highway land (for development purposes)
 - d) Monitoring Fee
 - e) Any other planning obligations considered necessary

- 2.2 That the Director of Planning and Strategic Transport is delegated authority to negotiate the legal agreement indicated above.
- 2.3 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. Time limit of 3 years
2. Development to be carried out in accordance with the approved drawings and reports except where specified by conditions (compliance)
3. Construction Logistics Plan to be submitted (prior to commencement)
4. Details of connection to foul and/or surface water drainage system to be submitted (prior to commencement)
5. Details and samples of materials to be submitted (including window reveals, balustrade/privacy screen details) (pre-ground slab)
6. Bin and bike stores (pre-ground slab)
7. SuDS (pre-ground slab)
8. Contaminated Land verification report to be submitted (pre-ground slab)
9. Details of lighting (pre-ground slab)
10. Electric vehicle charging point to be submitted (pre-ground slab)
11. Accord with mitigation and enhancement measures outlined in the Preliminary Ecological Survey (prior to occupation)
12. Landscaping to be submitted (hard and soft landscaping, boundary treatment/retaining walls, benches, play equipment and surface treatment) (prior to occupation)
13. No infiltration of surface water drainage into the ground (compliance)
14. Archaeological Watching Brief (compliance)
15. Accordance with Tree Protection Plan (compliance)
16. Inclusive access M4(2) and M4(3) (compliance)
17. Car parking provided as specified (compliance)
18. 110 litre Water usage (compliance)
19. CO2 19% Reduction (compliance)
20. Unexpected contamination (compliance)
21. Noise levels – internal to flats (compliance)
22. No further windows to west elevations and privacy screen to recessed balconies (compliance)
23. Obscure glazing to flank windows and privacy screens to balconies (compliance)
24. Any other planning condition(s) considered necessary by the Director of Planning and Strategic Transport

Informatives

- 1) Granted subject to a Section 106 Agreement
- 2) Community Infrastructure Levy
- 3) Code of practise for Construction Sites
- 4) Light pollution
- 5) Requirement for ultra-low NOx boilers
- 6) Nesting birds in buildings
- 7) Thames Water informatives regarding underground assets and public sewers

- 8) Environment Agency advice to applicant regarding contaminated land, piling, drainage and disposal of soil.
- 9) Any other informative(s) considered necessary by the Director of Planning and Strategic Transport

2.4 That the Planning Committee confirms that adequate provision has been made by the imposition of conditions, for the preservation or planting of trees as required by Section 197 of the Town and Country Planning Act 1990.

2.5 That the Committee confirms that it has paid special attention to the desirability of preserving or enhancing the character and appearance of the Norwood Grove Conservation Area, as required by Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

2.6 That, if by 30th October the legal agreement has not been completed, the Director of Planning and Strategic Transport is delegated authority to refuse planning permission.

3.0 PROPOSAL AND LOCATION DETAILS

3.1 The proposal includes the following:

- Redevelopment of part of the amenity land, involving the erection of a part 3, part 4 storey (split level) building
- Provision of 9 apartments (4x1 bed 2 person, 3x2 bed 3 person and 2x2 bed 4 person)
- One of the 1 bed 2 person homes would be a M4(3) wheelchair unit
- 5 off-street car parking spaces
- Retention of part of the amenity land (approximately 500 square metres) alongside the retention of the feature trees sited at the junction of Covington Way/Crescent Way and the provision of benches adjacent to the open space
- External materials – white and red brick with red tile hung roof – with the main entrance facing out onto the amenity land.
- Provision of private and communal amenity spaces including space for children play
- Internalised refuse and cycle storage (accessed off Crescent Way)

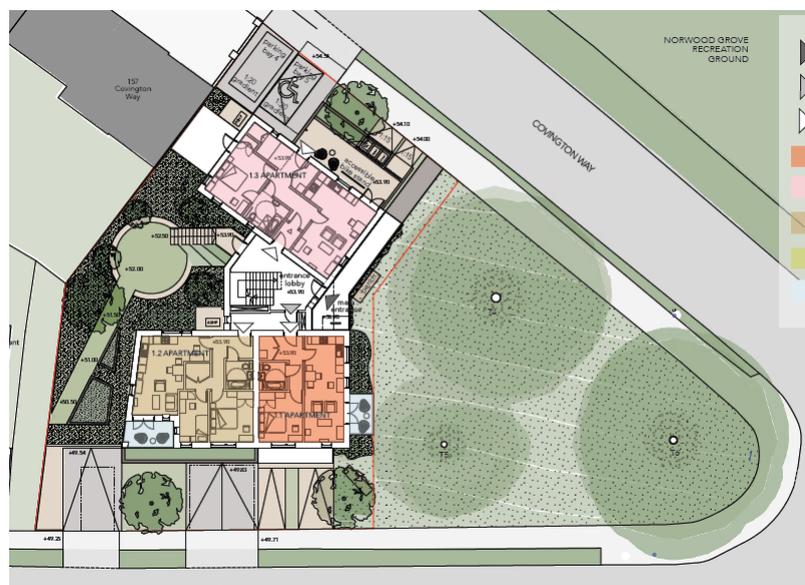


Fig 1: Proposed site plan (Upper Ground Floor Plan)

- 3.2 The main entrance into the building would be accessed from Covington Way via a step free pedestrian path adjacent to the retained open space/amenity area. All apartments would be accessed from a central stair core with the upper ground floor wheelchair unit also having direct access off Covington Way via a gated entry to the terrace area. The internal layout makes the most of the topography of the site with a lower ground floor level accommodating an apartment and internal refuse and cycle stores that would be accessed off Crescent Way, together with direct internal access to the central staircase serving all apartments. Access to a side communal garden and communal/children's play area would be from upper ground floor level off the central staircase; external steps would manage the levels within this external communal space. All apartments would have private amenity space, with the wheelchair unit having direct access into a private external garden.



Figure 2 – Elevation to retained amenity land (top left), Covington Way (top right) and Crescent Way (bottom)

- 3.3 The building would appear as three storeys fronting onto Covington Way, with the second floor being partly accommodated within the roof space. The building mass to the south would appear as 4 storeys, with the fourth floor partly accommodated in the roof space. The mass would then step back down to three storeys towards 45 Crescent Way.
- 3.4 The 5 off street car parking spaces would be provided in the form of forecourt bays, set at right angles to the street with vehicle crossovers. Two spaces would be accessed off Covington Way (one being dedicated to the wheelchair unit) with the remaining three spaces accessed off Crescent Way.
- 3.5 Amended drawings were received on 8 July 2020. These drawings illustrated minor internal layout alterations in order for the scheme to comply with fire safety regulations. Officers are satisfied the amendments are minor in nature and do not require a further round of consultation.

Site and Surroundings

- 3.6 The application site comprises an irregular shaped parcel of land (0.076 ha in area) situated at the junction of Covington Way and Crescent Way. Norbury Train Station and District Centre are approximately 15 minute walk from the site. The space is currently amenity grassland with a fall from north to south of approximately 4 metres and its widest point on the western side. The site is currently managed and maintained by the Council as highway land.
- 3.7 Six trees are present comprising a mixture of small staked trees (Wild Cherry and Sugar Maple) and three mature trees located towards the apex of the site (Tree of Heaven). The staked trees and one of the Tree of Heavens have been assessed as Category C whereas the other two Tree of Heavens (situated closest to the road junction) have been assessed as Category B.

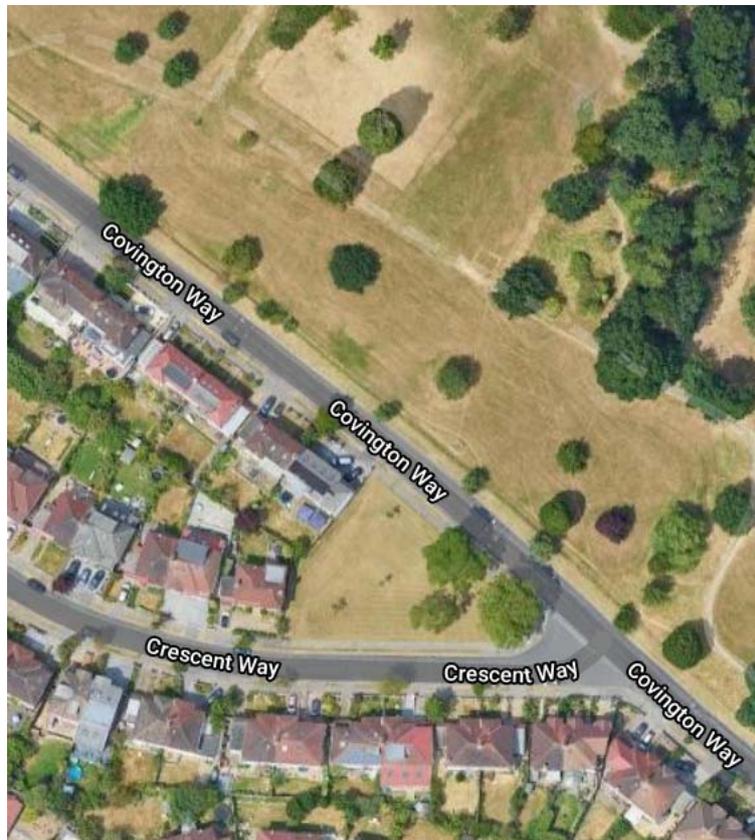


Figure 3 – Aerial Photograph of Site and Surroundings

- 3.8 To the west are flank elevations of two dwellings, one facing onto Covington Way the other Crescent Way. There is an existing underground TV cable running alongside the western boundary of the application site adjacent to the two metre close boarded fence. There is an existing crossover onto the site presumably used by the Council's grounds maintenance service.
- 3.9 The immediate site context comprise regular groups of semi-detached houses to the west and south, with large swathes of recreational open space to the north (Northwood Grove Recreation Ground) which is identified as a Statutorily Registered Historic Park and Garden and a Site of Importance for Nature Conservation (with focus on the Grade II Listed Building - Norwood Grove). The area to the north is also designated as

Metropolitan Open Land, an Archaeological Priority Zone, is included within the Northwood Grove Conservation Area and provides an important Croydon Local Plan (CLP) recognised panoramic view of the Croydon skyline.

- 3.10 The site is characterised by low levels of public transport accessibility (PTAL 1a) with PTALs ranging from PTAL 0-6. The closest bus stop to the application site is located 630 metres to the south (7 minutes-walk) Green Lane/Courtland Avenue (linking West Croydon Bus Station to Brixton Station). There are no car parking restrictions on Covington Way/Crescent Way, with the majority of houses having forecourt car parking (with crossovers) but with some on-street car parking common-place, between the dropped kerbs.
- 3.11 According to the Environment Agency Flood Maps the site is located in Flood Zone 1; less than 1,000 annual probability of sea or river flooding. In terms of surface water flooding, the surface water flood maps indicate that surface water flood risks are also very low, but with higher risks further south and west, with most of the risks contained within the Crescent Way/Covington Way highway corridor.

Planning History

- 3.12 There is no planning history associated with the application site. With regards to nearby properties, planning permission was granted in 1979 for the erection of a first floor side extension to 45 Crescent Way (LBC Ref 78/20/2354). This first floor extension was implemented, which included the installation of a ground floor high level window and a first floor casement window, both overlooking the adjacent amenity land.
- 3.13 In 2019, Brick by Brick entered into pre-application engagement that initially proposed 11 apartments and 4 family houses on the entire site (LBC Ref 19/04431/PRE). This scheme proposed the removal of 5 of the 6 trees and a 5 storey built form at the junction of Crescent Way and Covington Way. Officers were concerned about the level of intensification. As a result, the scheme has been reduced in scale thereby reducing its impact upon the setting of the conservation area, respecting the scale and character of the surrounding built form, preserving feature trees and more importantly maintaining a large proportion of the site for amenity space.

4.0 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The principle of intensified residential development is acceptable given the national and local need for housing.
- The partial loss of incidental amenity space is considered acceptable as the submission has demonstrated that not all of the site area is required to service the needs of nearby residents with regards to open space. As such, that section of the site to be built on is considered to be surplus to requirements.
- The proposal would contribute positively to the supply of family housing and the family housing strategic target.
- The proposal would also contribute to the delivery of affordable housing in the form of 4 shared ownership units (35% by habitable room).
- The development would not have any impact on the openness or function of neighbouring Metropolitan Open Land.
- The scheme would provide high quality architecture and would appropriately respond to site context with suitable relationships to the form, mass and appearance of Crescent Way and Covington Way and would provide an appropriate feature building at the junction.

- The development would have a neutral impact on the character and appearance of the adjacent Norwood Grove Conservation Area, Norwood Grove itself and the recognised panoramic view of Centre Croydon.
- The living conditions enjoyed by neighbouring residential occupiers would not be overly harmed by the proposed development (in terms of daylight, sunlight, enclosure and privacy effects).
- The living standards of future occupiers would be satisfactory (in terms of overall residential quality) and would comply with the Nationally Described Space Standard (NDSS). Each apartment would enjoy private amenity spaces in accordance with adopted standards as well as space for outdoor communal/children's play.
- The level of parking and impact upon highway safety and efficiency would be acceptable, with spare capacity on neighbouring streets to accommodate any overflow car parking demand. There is a requirement for the developer to work with the Council to carry out minor highway works to ensure that highway safety is maintained, especially at the junction of Covington Way and Crescent Way.
- Whilst it is accepted that the three staked trees would be removed, these would all be replaced as part of the proposals and the primary trees situated at the junction of Covington way and Crescent Way would be retained and protected.
- Sustainability aspects have been properly assessed and their delivery can be controlled through the use of planning conditions. On-site sustainable drainage would be secured through the use of planning conditions.

5.0 CONSULTATION RESPONSE

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

Lead Local Flood Authority (LLFA)

5.2 Even though this scale of development would not have normally triggered LLFA referral, it has been formally consulted and has raised no objection to the proposal subject to the inclusion of site drainage related conditions on any consent granted. These have been included.

6.0 LOCAL REPRESENTATION

6.1 The application has been publicised by way of 12 letters of notification to neighbouring properties in the vicinity of the application site. The number of representations received from neighbours in response to notification and publicity of the application are as follows:

No of individual responses: Objecting: 87 Supporting: 0 Comment: 0

A petition with 19 signatures was also received objecting to the proposed development.

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:

Objection	Officer comment
<i>Principle of Development</i>	

<p>Loss of open space – which the Council have highlighted as being potentially important – as Local Open Space (Issues and Options Consultation). The Council is being duplicitous in engaging with resident as part of the local plan process and encouraging redevelopment.</p> <p>The space is actively used by the local community – for picnics, summer events and children’s play, provides a visual break and contributes to suburban character.</p> <p>Open space should be treated as being critical, especially following on from the current Covid 19 pandemic. Such open spaces should be protected as it is conducive to maintain social and physical wellbeing.</p> <p>Should not build on green-field sites and should direct attention towards previously developed land to accommodate new homes.</p> <p>Back in 2004, Croydon Council advised that this land was highway land and was not for sale.</p>	<p>The loss of the open space is covered in paragraphs 8.2 to 8.14. The application can only be determined and assessed in accordance with current planning policy Any emerging plan making process (especially at Issues and Options stage) is not material to this particular planning application process.</p> <p>Around 500 square metres of open space would be retained including three significant mature trees. Officers are of the view that this area of open space and vegetation will help preserve much of the existing character of the immediate area and also provide sufficient incidental open space for community activities that currently rely on the site, such as picnics and summer events.</p> <p>It is recognised that residents value this area of incidental open space, however it should be noted that this part of Norbury also benefits from large expanses of open space/parkland in the immediate vicinity.</p> <p>It is recognised that the site has little brown field credentials, but officers are satisfied (on balance) that the partial loss of the open space can be justified, especially in view of the retention of a proportion of the existing amenity land.</p> <p>Whilst this letter does confirm that the land in question was not for sale back in 2004, a landowner can never be held to any decision to dispose/not to dispose of land under its control.</p>
<p><i>Housing Issues</i></p>	
<p>Housing will be priced for profit rather than affordability – no affordable housing proposed</p>	<p>Affordable housing is only expected in developments where 10 or more homes are proposed. However, in this case, the applicant is prepared to offer 4 of the apartments as affordable housing (shared ownership)</p>
<p>LB Croydon has already met its housing quotas – with over emphasis on flats rather than houses.</p>	<p>There is significant need for additional homes across the borough especially family housing where Council’s strategic</p>

	target of 30% of new homes being suitably sized for families.
The focus of the local area is towards young families and houses – and the provision of flatted accommodation would modify the character of the area and general demographics	There is no justification to focus any development purely towards family housing. Flatted accommodation is considered an acceptable development scenario for this site.
<i>Townscape and Design</i>	
<p>The existing green space provides a breathing space at the junction of Crescent Way/Covington Way and should not be eroded.</p> <p>The scale and form of the development would be totally out of keeping with the character and appearance of the area – with a three/four storey building being totally alien to the prevailing character of uniform 1930s semi-detached properties. Four storey development would over-dominate two storey houses in the area.</p> <p>The scheme would fail to comply with the Suburban Design Guide – which advises that adjacent to two storey houses, development should be limited to two storeys with a third storey in the roof void.</p> <p>The scale of development would over-dominate neighbouring property – with external balconies not being a feature of the immediate area. The proposed architecture bears no relation to the design of neighbouring properties.</p> <p>The development would not respect the character of surrounding properties.</p>	These issues are discussed in paragraphs 8.23 to 8.31. The application site is a corner site and is accordance with Councils adopted design guide has the capacity to accommodate greater height, whilst respecting the character and appearance of the area.
<p>3/4 storey development out of keeping.</p> <p>The local planning authority has refused planning permission for extensions to existing property – using strict guidance contained within the Suburban Design Guidance – building lines and set-backs. The same strict rules and guidance should be applied in this case.</p>	Each development proposal is assessed on its merits. House extensions need to relate more closely to the host property. There is more flexibility when considering free standing buildings (compared to proposed extensions).
<i>Heritage</i>	

<p>The scheme would fail to preserve or enhance the character and appearance of Norwood Grove Conservation Area and would detract from the panoramic vista – Norwood Grove Recreation Area and the value of the space as a statutory historic park and garden.</p> <p>Covington Way is a Local area of Special Character (LASC) and should be recognised as such.</p>	<p>Officers are satisfied that the scheme has a neutral effect on the various heritage assets. The character and appearance of the conservation area other heritage assets would be preserved.</p> <p>LASCs are no longer recognised by CLP</p>
<p><i>Scale of Development Density Issues</i></p>	
<p>Overdevelopment – with over-emphasis on small units of accommodation – rather than being family orientated – devaluing neighbouring property – social cramming in such a small space.</p>	<p>Officers are satisfied that this scheme does not constitute overdevelopment. The reasons for this are outlined in the Design/Townscape and Housing Quality Sections of this report.</p> <p>Loss of value is not a relevant planning consideration</p>
<p><i>Neighbour Impacts</i></p>	
<p>Loss of light and increased enclosure to neighbouring properties in Covington Way and Crescent Way – being taller than existing properties. The houses will block light to existing houses.</p> <p>Increased overlooking from 4 storey block and towards residential gardens and neighbouring two storey properties.</p> <p>Increased noise – with more people living in the neighbourhood and noise/dust disruption during the construction phase.</p>	<p>Addressed in paragraphs 8.45 – 8.51 of this report.</p>
<p><i>Highways, Traffic and Parking</i></p>	
<p>Very low PTAL which will not be able to support the scale of development envisaged with public transport located some distance away.</p> <p>Likely car ownership of future residents under-estimated with most houses having two cars.</p> <p>The level of on-site car parking seriously limited – adding to existing on street car parking stress in the immediate area.</p>	<p>Highway, parking and wider transportation issues are covered in paragraphs 8.52-8.57 below.</p> <p>There is no justification for a highway safety audit.</p> <p>According to the submitted transport assessment no collisions that resulted in personal injury were recorded in the area within the last three years.</p>

<p>Crescent Way/Covington Way is a rat run with highway safety issues and recent accidents (narrow and hilly with blind corners). The scheme should not be determined until such time as Road Safety Audit has been prepared, submitted and properly assessed as part of the application process. Reliance on outdated census data is flawed when trying to determine the likely level of car ownership when the site is characterised by low PTALs.</p> <p>The proposed forecourt parking would cause highway safety impacts particularly with cars reversing onto the highway with insufficient sightlines especially when the site is located close to the brow of a hill.</p> <p>Need to consider car parking restrictions in view of the level of use of neighbouring streets. Car parking restrictions will reduce the availability of on street car parking capacity.</p>	
<p><i>Trees, landscaping and Biodiversity</i></p>	
<p>Loss of trees – the staked trees replaced previous mature trees that were lost in a previous storm.</p> <p>The three retained trees would be threatened and are an important constituent of the open space and its value.</p> <p>Biodiversity would be significantly reduced.</p>	<p>The trees to be removed are proposed to be replaced, with an uplift in the number of trees.</p> <p>Biodiversity would be suitably mitigated and enhanced where possible</p>
<p><i>Other Issues</i></p>	
<p>This application should not have been submitted and/or considered during the Covid 19 crisis as it not easy for public engagement to take place and neighbour communication to discuss planning merits.</p>	<p>The Government expects planning processes to continue even with the current Covid 19 Pandemic. Whilst it is appreciated that the ease of communication is more restricted, the scheme has still generated much interest and comment, all of which has been</p>

	taken into account as part of the officers' assessment of the scheme.
Lack of Health Impact Assessment	<p>There is no requirement to submit a Health Impact Assessment as it is not covered by Local Planning Application Validation Requirements.</p> <p>It is acknowledged that the loss of open space might affect health and well-being of local residents especially during current circumstances. However, there is ample alternative open spaces in close proximity of the application site. The proposal would not result in an unacceptable loss of open space in the area.</p>
Flooding risks in the immediate area with many underground streams crossing the area.	Flood impacts have been discussed within Section 8.64
Extra pollution and noise disturbance. Pollution from extra cars and to future occupiers (front balconies and roof top amenity space)	<p>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. The additional impact on the highway network is considered to be negligible.</p> <p>The Council's Environmental Health Team have raised no objection to the proposals subject to the imposition of standard conditions to protect future occupiers from noise and to limit impact on existing neighbours (construction logistics).</p>
<p>Brick by Brick receive preferential treatment as not all developers would be allowed to over-develop in this way.</p> <p>Council is prejudiced as it is wishing to sell the site and make a profit on the development.</p>	Brick by Brick applications are assessed against the same planning policies as all applications determined by council. The Croydon Local Plan is generally supportive of increased densities in the suburbs, subject to the effects of increased densities on neighbour impact, the effect on existing character and appearance and traffic/transport/highway effects).
Restrictive covenant on the land requiring it to be set aside as open space	This is not material to the determination of the planning application

6.3 Cllr Paul Scott (Planning Committee Vice-Chair) referred the application to Planning Committee raising the following issues:

- Public scrutiny of applications made by the Council and its wholly owned subsidiary.
- Openness and transparency during the Covid-19 crisis when stakeholders are likely to be distracted.
- Potential to provide new homes in response to the housing crisis in accordance with National, Regional and Local Planning Policy.

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 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. The NPPF identifies a number of key issues for the delivery of sustainable development, those most relevant to this case are:

- Delivering a sufficient supply of homes
- Promoting sustainable transport;
- Achieving well designed places;
- Protecting Metropolitan Open Space.

7.3 The main policy considerations raised by the application that the Committee are required to consider are:

Consolidated London Plan 2016

- 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
- 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
- 7.8 Heritage Assets and Archaeology
- 7.14 Improving air quality
- 7.17 Metropolitan Open Land
- 7.19 Biodiversity and access to nature
- 7.21 Woodlands and trees

Croydon Local Plan 2018

- SP2 Homes
- DM1 Housing choice for sustainable communities
- SP4 Urban Design and Local Character
- DM10 Design and character
- DM13 Refuse and recycling
- DM16 Promoting healthy communities
- DM17 Views and Landmarks
- DM18 Heritage Assets and Conservation
- SP6 Environment and Climate Change
- DM23 Development and construction
- DM24 Land contamination
- DM25 Sustainable drainage systems and reducing flood risk
- SP7 Green Grid
- DM26 Metropolitan Green belt
- DM27 Biodiversity
- DM28 Trees
- SP8 Transport and communications
- DM29 Promoting sustainable travel and reducing congestion
- DM30 Car and cycle parking in new development

Emerging New London Plan

7.4 Whilst the emerging New London Plan is a material consideration, the weight afforded to it is down to the decision maker, linked to the stage a plan has reached in its development. The New London Plan remains at an advanced stage of preparation but full weight will not be realised until it has been formally adopted. Despite this, in accordance with paragraph 48 of the NPPF substantial weight can be applied to those policies to which the Secretary of State has not directed modifications to be made.

7.5 The policies of most relevance to this application are as follows:

- D1 London's form, character and capacity for growth
- D2 Infrastructure requirements for sustainable densities
- D3 Optimising site capacity through the design-led approach
- D4 Delivering good design
- D5 Inclusive design
- D6 Housing quality and standards
- D7 Accessible housing
- D8 Public Realm
- H1 Increasing housing supply
- H10 Housing size mix
- S1 Developing London's social infrastructure

- S4 Play and informal recreation
- HC1 Heritage conservation and growth
- G1 Green infrastructure
- G4 Open space
- G5 Urban greening
- G6 Biodiversity and access to nature
- G7 Trees and woodlands
- SI1 Improving air quality
- SI2 Minimising greenhouse gas emissions
- SI3 Energy infrastructure
- SI5 Water infrastructure
- SI7 Reducing waste and supporting the circular economy
- SI12 Flood risk management
- SI13 Sustainable drainage
- T1 Strategic approach to transport
- T2 Healthy streets
- T3 Transport capacity, connectivity and safeguarding
- T4 Assessing and mitigating transport impacts
- T5 Cycling
- T6 Car parking
- T6.1 Residential parking
- T7 Deliveries, servicing and construction
- T9 Funding transport infrastructure through planning
- DF1 Delivery of the plan and planning obligations

7.6 There is relevant Supplementary Planning Guidance as follows:

- 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 raised by the application that the Planning Committee are required are as follows:

1. Principle of development
2. Housing
3. Impact on openness of adjacent Metropolitan Open Land
4. Townscape, design and visual impact
5. Heritage impacts
6. Housing quality for future occupiers
7. Residential amenity for neighbours
8. Parking and highway safety
9. Trees, landscaping and biodiversity
10. Flood risk
11. Sustainability
12. Other planning matters

Principle of Development (Housing and Open Space)

8.2 This proposed development needs to be assessed against a backdrop of significant housing need, not only across Croydon but across London and the south-east. All

London Boroughs are required by the London Plan to deliver a number of residential units within a specified plan period. In the case of the LB Croydon, there is a requirement to deliver a minimum of 32,890 new homes between 2016 and 2036 (Croydon's actual need identified by the Croydon Strategic Housing Market Assessment was an additional 44,149 new homes by 2036, but at the time, there was limited developable land available for residential development in the built up area, it was only possible to plan for 32,890 homes). This requirement is set out in policy SP2.2 of the CLP (2018) which separates this target into three sub targets with 10,760 new homes to be delivered within the Croydon Opportunity Area, 6,970 new homes as identified by specific site allocations for areas located beyond the Croydon Opportunity Area boundary and 10,060 homes delivered across the Borough on windfall sites.

- 8.3 The emerging New London Plan, which is moving towards adoption (although is being further amended) proposes increased targets which need to be planned for across the Borough. In order to provide a choice of housing for people in socially-balanced and inclusive communities in Croydon, the Council will apply a presumption in favour of sustainable development of new homes.
- 8.4 This presumption includes places such as Norbury, which advises that there will be opportunities to deliver new homes on windfall sites and infilling, together with dispersed integration of new homes that respect existing residential character and local distinctiveness. The Croydon Suburban Design Guide (2019) was adopted last year, which sets out how suburban intensification can realise high quality outcomes. The challenging targets will not be met without important windfall sites coming forward in addition to the large developments within Central Croydon and on allocated sites.
- 8.5 Notwithstanding the above, the site has not been previously developed and is an area of amenity land with some clear associations with the evolution of the immediate suburban settlement of Covington Way and Crescent Way, marking the junction between the two roads. As highlighted in the public submissions, the land is valued both visually and functionally by local residents. Whilst it was clear that the majority of residents who engaged confirmed that they regularly made use of the application site for amenity purposes, they also confirmed that they use other spaces located in close proximity (including Norwood Grove Recreation Area).
- 8.6 Whilst the site has very limited brownfield land credentials and is valued by local residents, it is significant that the space only appears to be used by those residents bordering the site and has more limited wider utility, especially as all houses in the immediate area have access to relatively sizeable rear gardens. Whilst it is fair to say that the space provides an open and pleasant outlook for existing residents living relatively close by, the space has relatively limited biodiversity value and apart from the three trees which are proposed to be retained, the site has relatively limited utility being maintained as open grassland as part of the public highway. The changes in topography between Covington Way and Crescent Way also limits its use (in terms of ball games and more active leisure pursuits).
- 8.7 The pre-application scheme proposed the redevelopment of the majority of the site; the current proposal preserves approximately 500 square metres of open space and retaining all three Tree of Heavens. The retention of this area of open space would maintain some visual relief and softening at the junction of Crescent Way/Covington Way and allows sufficient area for some continued low key leisure use and engagement (picnics and dog walking) and also for other social activities such as street parties and small scale local fairs.

- 8.8 Paragraph 97 of the National Planning Policy Framework advises that existing open spaces should not be built on unless an assessment has been undertaken which clearly indicates that the open space is surplus to requirement or where the loss resulting from the proposed development would be replaced by equivalent or better provision elsewhere. It is significant that the site has not been designated or recognised as an open space although the utility of the space needs to be assessed against the NPPF. The applicant has sought to justify the loss of this space, both from a visual and functional perspective.
- 8.9 As part of the application submission, the applicant has provide details of how the site is currently utilised by local residents and provided information demonstrating how the proposal would only result in the loss of open space that is surplus to requirement.
- 8.10 The applicant has argued that the sloping and open nature (open on two sides and close to a road junction) limits its overall utility as an active site for children's play (ball games for example) and general exercise area. Moreover, they have argued that the utility of the space for such purposes is also limited, in view of the availability of more functional open spaces in close proximity to the site such as Norwood Grove Recreation Ground, The Rookery and Streatham Common beyond all of which have formal play and sporting facilities as well as a park café. Officers are of the view that, given the availability, proximity (5 min walk) and extent (23 hectares) of these nearby recreational areas and facilities, the site with regards to play and sport is surplus to requirements for residents in the immediate area.
- 8.11 Notwithstanding the above, officers recognise that residents feel strongly about the loss of open space and the contribution it makes to the look and feel of the area and their mental well-being. Officers also acknowledge that the space is an important area for localised social gatherings such as street parties and alike, that are less likely to take place in the nearby larger open spaces. For these purposes, officers are of the opinion that the space is an important asset that is not surplus to requirement. However, in saying that, officers do question the level of open space needed in order to preserve the look and feel of the area and also provide sufficient and useable space for those important community gatherings outlined above.
- 8.12 In terms of retaining the open and green character of the area, officers are of the view, the retention of the three large tree of Heavens at the apex of the site is crucial. The trees contribute significantly to the aesthetics of the area, and also provides significant areas of shade/shelter that can be utilised by residents for social events. In this respect, the area of land to be built on is the steepest section of the site and currently has minimal practical use for such community activities. Specifically, in terms of the usability of the area to be retained, the applicant has provided substantial detail on how the space can be used effectively by residents. As shown by the images below (Figure 4), the retained land allows ample space to be used as a picnic area, winter market, local fayre and other similar social gatherings. Further, it has been demonstrated that the area could be used as an overflow space for street parties and other street based activities that may on occasion occur.



Figure 4 - Illustration of how the space could be used for social gatherings

8.13 With regards to the partial loss of open space, the submitted documentation provides sufficient information that establishes how the site is both valued and used by residents living in the immediate area of the site. It is clear that the site is surplus to requirement with regards to play space and for exercise purposes, as more appropriate open space is located in the immediate vicinity of the site. Notwithstanding this, it is also clear that the space still has a role in facilitating social gatherings for nearby residents and provides much appreciated aesthetics. Based on this, officers are of the opinion that on balance, the retention of around 500 square metres of open space provides sufficient area to both preserve the physical character of the locality and also allow for the continued use of the site for social activities. As such, the proposal accords with the intent of paragraph 97 of the NPPF and officers are comfortable with the partial loss of the open space to accommodate much needed new homes.

8.14 The site is located within an existing residential area and for the reasons outlined above, providing that the proposal accords will all other relevant material planning considerations, the principle of development can be supported.

Housing

8.15 CLP Policy SP2.7 seeks to ensure that a choice of homes is available to address the borough's need for homes of different sizes and that this will be achieved by setting a strategic target for 30% of all new homes up to 2036 to have three or more bedrooms. Policy DM1.1 requires a minimum provision of homes designed with 3 or more bedrooms on sites of 10 or more dwellings. In suburban settings with low PTALs, the requirement is 70% 3+ bedroom units. That said, Policy DM1.1 also advises that within the first three years of the CLP, the requirement for 3 bedroom homes can be substituted by 2 bed 4 person homes.

8.16 Bearing in mind that this scheme proposes less than 10 residential units, the requirements of Policies SP2.7 and DM1.1 do not necessarily apply but in any case, the proposed development would provide a good mix of homes with two of the apartments (22%) being suitably sized for small families, with a further two units being suitably sized as 3 person units (available for a couple with a child). The scheme would therefore contribute to the 30% strategic family housing target.

Affordable Housing

8.17 The CLP (2018) states that to deliver affordable housing in the Borough on sites of ten or more dwellings, the Council will negotiate to achieve up to 50% affordable housing, subject to viability and will seek a 60:40 ratio between affordable rents homes and intermediate (including shared ownership) homes unless there is an agreement with a Registered Provider that a different tenure split is justified.

8.18 As this scheme proposes less than 10 new homes, there is no specific policy requirement to deliver a proportion of these homes as affordable housing. However, the developer has advised that they intend to deliver the 4x1 bed flats (including the proposed wheelchair unit) as affordable (shared ownership) accommodation. This would equate to 35% (by habitable room) which represents a benefit of the scheme which needs to be considered and balanced against other aspects of the proposal. Whilst not a strict policy requirement, in this particular instance officers feel it would be reasonable and necessary (when considering the scheme as a whole) to secure these four affordable homes as part of a subsequent planning permission via an associated S.106 Agreement.

8.19 In short, the scheme would provide a good range of family and non-family homes and would positively contribute to the delivery of new homes (including affordable homes).

Density of Development

8.20 The site has a suburban setting with a PTAL rating of 1a and as such, the London Plan indicates that the density levels ranges of 150-200 habitable rooms per hectare (hr/ha). It also advises that where there is an average of 2-3 habitable rooms per unit, a scheme should normally expect to achieve 50-75 units per hectare. Treating the combined living/kitchen/dining areas as a single habitable room, the proposed density of development would equate to around 303 habitable rooms per hectare and 118 units per hectare. However, it is of relevance that if one includes the land proposed to be retained as amenity space (which would add a further 500 square metres to the site area) the density would equate to 217 habitable rooms per hectare or 85 units per hectare which would only marginally be in excess of the density range suggested for suburban development in low PTAL areas.

8.21 As Members will be aware, the London Plan indicates that it is not appropriate to apply these ranges mechanistically, as the density ranges are broad, to enable account to be taken of other factors relevant to optimising potential such as local context, design and transport capacity. The acceptability of the development in terms of scale, mass, layout and appearance is discussed below, which represents an important dimension when determining the acceptability of a particular density of development. This project has clearly emerged out of a design-led response to the site and its various relationship challenges.

Impact on Openness of adjacent Metropolitan Open Land

8.22 The site lies adjacent to but not within the Metropolitan Open Land (MOL). MOL policies (National to Local) aim to protect and preserve the openness of MOL by preventing inappropriate development within the designated MOL boundaries. Such policies do not refer to development adjacent to such designations and as such, the location of the site adjacent to the MOL does not prohibit development. Whilst the proposed scale of development would be different from that which currently exists, officers are satisfied that the scheme would not harm the open character of the adjacent MOL or erode its function.

Townscape and Visual Impact

8.23 CLP Policy DM10.1 states that proposals should achieve a minimum height of 3 storeys whilst respecting 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. Approaches to scale and mass are further outlined in the Suburban Design Guide.

8.24 The existing site comprises open incidental amenity land. Whilst this presents a pleasant relationship and has visual benefits for the locality, there is nothing intrinsically wrong with the principle of partial residential redevelopment of the amenity land from a townscape perspective, as long as the built form respects and positively responds to the character and appearance of neighbouring properties.



Figure 5 - Site Photograph looking east from junction of Covington Way and Crescent Way

8.25 This site has prominence at the junction of Covington Way and Crescent Way and being a corner site, there is scope to establish some height at the junction of these two roads. Section 2.14 of the Suburban Design Guide advises that corner plots should seek to accommodate additional height and depth as marker points within the townscape. It further advises that schemes should seek to include an additional storey to the 3 storeys recommended by CLP DM10.1 (or further height under specific circumstances) and acknowledges that schemes may extend beyond the neighbouring rear elevations to enhance the definition of the suburban block.



Figure 6. SDG corner plots

Site Layout

8.26 The site layout seeks to manage the dual relationships, engaging with both the Crescent Way and Covington Way street frontages whilst managing the inevitable topographical challenges of a 4 metre change in level north to south. The layout would provide entrances into the building from both Crescent Way and Covington Way with a further frontage facing onto the retained open space. Officers are satisfied that the scheme appropriately considers the corner location in accordance with the SDG and adequately addresses the retained open space and the street frontages. The scheme would broadly follow prevailing building lines (front and back) and the various requirements of a flatted scheme (refuse and cycle storage) would be contained within the building, resulting in relatively limited forecourt clutter, apart from some on site forecourt car parking which is commonly found elsewhere in the vicinity.



Figure 7 - View of scheme from Covington Way/Crescent Way Junction

8.27 Overall, officers are satisfied with the form and layout. Residents have made great play of the residential character of the area being focussed around family houses with gardens. Whilst this suburban character is acknowledged, there is no justification to restrict the delivery of flatted accommodation in such an area subject to such a scheme respecting the prevailing character and scale of its surrounds. In this instance, officers are of the opinion that that resultant building appropriately addresses the street, effectively manages the change in scale, height and architectural form and responds effectively to its site and surroundings.



Figure 8 View of scheme – looking east along Crescent Way

Scale and Mass

- 8.28 The prevailing scale form and mass of development in the immediate vicinity comprises two storey semi-detached pairs of houses a number of which have been previously extended in the form of two storey side extensions. Whilst it is accepted and appreciated that the form and height of this development might move away from the regular rhythm of 1930s semi-detached pairs, CLP policy (supplemented by the Suburban Design Guide) actively encourages more intensive forms of development (taller and with greater massing) in order to help deliver the number of additional homes the borough needs. It is acknowledged that the proposed development would result in a contrasting height relationship (rising up from 45 Crescent Way and 157 Covington Way) but in view of the adopted policy approach, officers raise no objection to such a change in scale, form, height and mass. The change of scale would be further moderated by the use of dormer windows (accommodated within the Covington Way and Crescent Way elevations).
- 8.29 There would be reasonable separation between these two neighbouring properties (9 metres in the case of 45 Crescent Way and 4 metres in the case of 157 Covington Way). This should help graduate between the existing and proposed massing, resulting in an appropriate relationship between these built forms. Further, the proposed external material pallet (red and white brickwork) should help to ensure that the development respects the character of the immediate area and neighbouring properties. The proposed apartment block would respect the change in topography and would provide a stepped relationship to roof forms resulting in acceptable prominence closest to the road junction, with reduced height and mass adjacent to neighbouring houses.

External Appearance

- 8.30 The proposed choice of material would help mitigate any suggestion of inappropriate scale. The proposed use of red and white brickwork, with red clay tile roofs would respect the external appearance of neighbouring residential property, providing a simple, albeit effective material palette.
- 8.31 Officers are satisfied that the use of recessed and projecting balconies would further help break up the overall mass and provide added visual interest when viewed from the junction of Covington Way and Crescent Way.



Figure 9 - External materials details

Heritage Effects

8.32 The submitted Heritage Assessment identified various designated heritage assets (including three conservation areas, two Grade II Registered Parks and Gardens, 25 Grade II Listed Buildings and 4 Locally Listed Buildings). Officers accept the applicant's view that the vast majority of these heritage assets share no relationship with the site nor have meaningful association with the site and its surroundings. The exceptions to this included the Grade II Registered Park and Garden (Norwood Grove and the Rookery), the Grade II Listed Building (Norwood Grove) and the Norwood Grove Conservation Area. The assessment reviewed the significance of these various heritage assets and assesses the effect of the development on each.

Norwood Grove Registered Park and Garden (Grade II)

8.33 Officers agree with the findings of the heritage assessment that the site makes no positive contribution to the setting of the registered park and garden and therefore its significance; with the proposed development being read as part of the suburban setting rather than the Historic Park and Garden. Officers are satisfied that the development would not materially affect or detract from the existing setting.

The Rookery Registered Park and Garden (Grade II)

8.34 The site does not feature in the setting of The Rookery and consequently the significance of the heritage asset would not be harmed.

Norwood Grove House (Grade II)

8.35 The site is screened from view from the Listed Norwood Grove by groups of trees and formal planting and whilst the scheme will effect a change to the setting of the historic grounds, it would have no effect on the house itself.

Norwood Grove Conservation Area

- 8.36 The Norwood Grove Conservation Area is split into 3 distinct character areas, each with its own unique characteristic. The only part of the conservation area which has the potential to be affected by the proposal is the area occupied by Norwood Grove Recreation Ground alongside its associated and recognised panoramic view across to Central Croydon. The Norwood Grove Conservation Area Appraisal and Masterplan (CAAMP) advises that the panoramic view represents an important part of its character and appearance. Officers agree with the overall conclusion that these views will not be affected by the proposed development, especially as the site is located to the west of the direct view towards Central Croydon, is at a significantly lower level when compared to the Recreation Ground (as illustrated by figure 10 below) and will maintain the general building height established by those nearby dwellings fronting Covington Way.
- 8.37 Although no longer recognised by CLP, the CAAMP also lists 157-187 Covington Way as a Local Area of Special Character (LASC). These houses bound the southern boundary of the conservation area and officers are of the view that they possess architectural, townscape and environmental quality. Officers are of the opinion that the overall scale and appearance of the development would sit comfortably within its setting including these properties. Although the proposed building would continue the line of dwellings that boarder the conservation area, given its design and appearance, it would sit independently from it and would not detract from these dwellings contribution to the locality.



Figure 10 – View of Site from Norwood Grove Recreation Ground Local Panorama



Figure 11 - Extract from Norwood Grove Conservation Area Appraisal and Masterplan – Panoramic View

8.38 Overall, officers conclude the development preserves the character, appearance and setting of these heritage assets.

Housing Quality for Future Occupiers

8.39 All of the proposed new units would comply with or exceed the internal dimensions required by the Nationally Described Space Standards (NDSS). All apartments would be dual aspect and would have open outlook over either Covington Way, Crescent Way or the retained open space.

8.40 The planning application was accompanied by a daylight and sunlight assessment which concluded that all proposed rooms would comply with the BRE “No Skyline” test (NSL). There would be some very minor “Average Daylight Factor” (ADF) issues with two kitchen/living/dining areas not achieving the expected 2% target (achieving between 1.4% and 1.9%) influenced by the size and depth of the kitchen/dining area. A number of windows would also not meet the target values for Average Probable Sunlight Hours (APSH) affected by the cantilevered and recessed balconies. However, overall officers are satisfied that the daylight and sunlight levels would be acceptable as rooms meet with required APSH and the proposed design provides for light and well ventilated residential accommodation, appropriate floor to ceiling heights and access to outdoor amenity space.

8.41 Any noise issues associated with neighbouring traffic would be mitigated through standard noise insulation measures and planning conditions have been recommended to ensure that external noise effects are minimised.

8.42 It is proposed to provide a 1 bed (2 person) wheelchair unit as part of the proposal, with full wheelchair access into a private garden. The unit would enjoy its own dedicated off-street car parking space as well as separate cycle and refuse storage within the front garden area (fronting onto Covington Way). Level access would be possible into the building with a level ramp leading from Covington Way to upper ground floor level. Access to all floors would be via a central staircase. Whilst there is no lift proposed as part of the development and full M4(2) compliance would not be achievable, all flats would meet M4(2) compliance internally. All flats would have access to the lower ground floor cycle and refuse storage areas via the central staircase.

- 8.43 As regards external amenity space, the London Housing SPG states that a minimum of 5 square metres of private outdoor space should be provided for 1-2 person dwellings and an extra 1 square metres for each additional unit. Private amenity space has been provided for all units in the form of terraces and balconies. The provision of private amenity space is acceptable.
- 8.44 Communal amenity space is provided adjacent to the flank elevation of 45 Crescent Way, with direct access off the central staircase (via a set of steps which follows the topography). A children's play area is shown within this area, the scale of which would accord with the amount required (7.2sqm) by Policy DM10.4. Details would need to be secured as part of the planning conditions discharge process. As the units all have private amenity space and in view of the close proximity of publicly accessible recreation ground which offers plentiful open space and play equipment, the provision as proposed is considered acceptable.

Residential Density and Effects on Immediate Neighbours

Neighbour Impacts

- 8.45 The neighbours most affected by the proposed development are the immediate neighbours (45 Crescent Way and 157 Covington Way) and those houses located on the opposite side of Covington Way.

45 Crescent Way

- 8.46 This semi-detached property has two side windows overlooking the amenity space (at ground floor and first floor). Both windows provide secondary light and outlook (ground floor lounge and first floor bedroom). The development would be sited approximately 9 metres from this flank elevation and with alternative sources of light to these affected rooms, the impact of the development on this property would be acceptable. All proposed flank windows facing onto this flank elevation would be obscure glazed and conditioned as such. The proposed recessed balconies would need to be accompanied by privacy screens to direct views away from these existing side windows, secured through planning condition. Any other window which might otherwise overlook the rear garden to 45 Crescent Way would either serve bathrooms or be secondary windows and obscure glazing, controlled through the use of planning conditions.
- 8.47 A daylight/sunlight assessment was submitted with the application. In terms of internal levels to 45 Crescent Way, the rooms would all meet BRE guidelines with regards to Vertical Sky Component (VSC), NSL and APSH. The report also reviews the impact of the development on sunlight within the rear garden of this property. The assessment determined that the host dwelling itself, on 21 March (during Spring Equinox) would overshadow the majority of the rear garden, leaving 28% of the garden exposed to sun on ground. As a result of the scheme, this figure will be reduced to 18% with the only section of the garden in the north-west corner receiving sunlight. Although, it is acknowledged that the area of garden exposed to sunlight would be less than 0.8 of its former value, the loss is not likely to result in an unacceptable impact upon occupants of the garden, on balance. This area is unlikely to be used regularly outside the warmer months of the year when on ground sun levels within the garden as a whole are significantly improved. For example, on 21 June, 70% of the garden would receive 2 hours or more sun on ground. Officers are satisfied with the amenity impacts to this neighbouring property

157 Covington Way

- 8.48 The flank elevation to this neighbour is void of windows and there should be no impact on immediate overlooking from the element of the proposed development fronting onto Covington Way. Window to window separation from some of the inward facing windows (particularly the 2 bed apartment fronting onto Crescent Way) would be around 13 metres, but this relationship would be mitigated through a difference in land level and the angle of view.
- 8.49 With regards to daylight and sunlight into the dwelling at 157 Covington Way, a single secondary window would experience a reduction marginally greater than the 20% target recommended by the BRE guideline. At 22.8%, officers are of the opinion that as this reduction to a secondary window is only slightly greater than that recommended by guidelines it would not result in an unreasonable daylight and sunlight impact as the room receives VSC and APSH that meets BRE guidance. The impact upon the rear garden of 157 Covington Road has also been assessed against the BRE guidelines. The daylight assessment determined that the garden would maintain at least 2 hours of sunlight (sun on ground) on 21 March and as such would comply with the BRE guidelines.

Properties on Opposite Side of Crescent Way

- 8.50 Whilst these houses are situated at a lower level, the window to window separation would be in excess of 25 metres (across the street) which would maintain a reasonable level of privacy, even with the proposed height of the proposed development and being situated on higher ground.
- 8.51 In summary, whilst the proposed development would inevitably change existing relationships and modify existing open outlook enjoyed by neighbouring residential occupiers, the form/mass and detailing of the proposed development would successfully engage with existing Crescent Way and Covington Way properties with acceptable amenity impacts.

Highway Safety, Access and Parking

- 8.52 The planning application was supported by a Transport Statement, dealing with the various transport impacts and associated mitigation measures. The site is located in a low PTAL (1a) – some distance from local bus stops and it is inevitable that the development is likely to generate travel demands, additional vehicle movements and pressure on existing on and off street car parking conditions.

Car Parking, Trip Generation and Highway Safety

- 8.53 Census data (Ward Level) suggests that 59% of residents residing in flats do not own a car, with 36% owning 1 car and a further 5% owning 2 or more cars. As this data is collated from a much wider area (including areas characterised by higher PTAL levels) it is quite possible that car ownership is going to be higher in this particular location and it is likely that the development would need to rely on some on street car parking capacity to accommodate any visitor parking and over-spill car parking.
- 8.54 The Statement sought to assess likely levels of travel to and from the site and the mode used. Officers are satisfied that the level of traffic generated by the development. Existing accident data has been reviewed with no evidence of any collisions or accidents which counters the views expressed by local residents. This would strongly suggest that the existing network is sufficiently robust to accommodate further development.

- 8.55 The London Plan sets out maximum car parking standards for residential development, based on public transport accessibility levels and local character; 3 bedroom houses should provide up to 1 space per unit (up to 9 car parking spaces). The provision of 5 off street car parking spaces would comply with this approach.
- 8.56 The car parking beat survey suggests that whilst there are vehicles regularly parked in Covington Way and Crescent Way, parking stress in the area is only at 28% and as such there is sufficient capacity (up to 152 car parking spaces) within a 200 metre radius of the site to accommodate any shortfall. This is also taking into account the expectation that car ownership is likely to be higher (closer to 1 car per household) and with car parking controls likely to be imposed at the Covington Way/Crescent Way junction. This would help manage traffic in and around the site and address highway safety concerns.
- 8.57 Officers are similarly satisfied that vehicles will be able to enter and exit the car parking spaces safely. Whilst it is appreciated that cars will be expected to reverse out of or onto the forecourt spaces, this would be no different to other situations found within both Covington Way and Crescent Way and as long as 1.5 x 1.5 metre sightlines are provided (secured by condition), the safety of pedestrians and other road users would be suitably respected.

Cycle and Refuse Storage

- 8.58 Space for cycle parking, both external and internal to the building (designed to accommodate 22 cycles) would be provided (with 5% provided as Sheffield Stands) which would accord with the emerging New London Plan standards. Details would need to be approved as part of a planning conditions discharge process. With regards to refuse, sufficient space has been proposed within the lower ground level to accommodate the required refuse storage (1 x 1100 Litre landfill, 1 x 1280 Litre recycling, 1 x 140 litre food recycling). In addition, separate external refuse storage area for the proposed wheelchair unit has been provided. Refuse facilities are easy to access for collection off both Covington Way and Crescent Way and suitable drag distances. Refuse storage areas are able to be accessed both off the external stair-core as well as external to the building. A 10sqm bulky waste storage area is also proposed to be located adjacent to the western boundary fronting Crescent Way. Details of the external refuse enclosure to the wheelchair unit would also need to be agreed as part of the conditions discharge process.

Other Highway Impacts

- 8.59 Access arrangements would remain unaffected although as the existing site is formally identified and recognised as highway land, the highway use would need to be extinguished prior to works commencing. This might also include relocation of the existing crossover to provide access to the retained highway land (at the apex of the site). There will also be a requirement for various highway works, including car parking restrictions to limit car parking at the junction of Covington and Crescent Way and in other nearby locations where safety might be compromised by on street car parking associated with this development. These measures would need to be addressed as part of a S.106 Agreement process.
- 8.60 A draft Construction Logistics Plan has been submitted which has highlighted details issues that can be suitably resolved at planning condition discharge stage.

Trees, Landscaping and Biodiversity

Trees

- 8.61 There are 6 trees on site, three of which require removal. Two of the trees are Category C and the other is Category B. Officers are satisfied with the removal of these trees and it is significant that the proposal seeks to replace them with other tree specimens (fronting onto both Crescent Way and Covington Way and within the communal amenity space). The retention of the three prominent trees is very important. The arboriculture assessment has properly assessed the value of the trees to be protected and tree protection measures have been submitted to ensure that the trees are protected during the construction phase. The trees and the retained amenity land would continue to be maintained by the Council as highway land.

Landscaping

- 8.62 The landscape strategy seeks to deliver seamless links and relationship with the adjacent/retained amenity land, with a strip of land immediately adjacent to the main entrance ramp maintaining the site's existing slope, with proposals for two benches looking out into the amenity space. It is considered crucial that the entrance ramp is softened in appearance (plants and hedging) in order to provide an appropriate response to the neighbouring open space. It is also important that the proposed car parking bays, boundary treatment and soft landscaping to the communal garden is provided to a high standard and consequently; these finer details would be dealt with by landscaping condition.

Ecology

- 8.63 The site is located within close proximity to a SINC and a Local Nature Reserve. In view of this a Biodiversity Report was submitted as part of the planning application. The report confirmed that as the majority of the site consists of grassland, it has very limited ecological value. Notwithstanding this, and given the presence of mature trees and areas of shrub, the report recommends various mitigation measures to ensure that any biodiversity present on and off site is suitably managed. Specifically, the report suggested the following, which will be secured by condition and informative:

- Light spillage from the site is minimised.
- Any loss in habitat should be replaced to ensure a net gain in biodiversity.
- Bat boxes should be placed on retained trees and or on suitable sections of the new building.
- Clearance of all suitable nesting bird habitat must be completed outside of the nesting bird season.
- Provision of bird boxes on the new building and or trees.

Flood Risk

- 8.64 The site has a very low risk of fluvial flooding (Flood Zone 1) and surface water flooding and the mitigation measures include the installation of surface water attenuation tanks (beneath the hard surface car parking areas and paved areas in front of the refuse store) to manage surface water discharge. It is recommended that a SUDs condition be imposed.

Sustainability

- 8.65 CLP Policy SP6.3 requires all new build residential development of fewer than 10 units to achieve the national technical standard for energy efficiency in new homes – set at a minimum of 19% CO2 reduction beyond Part L of the Building Regulations and

requiring new build development to meet a minimum water efficiency standard of 110 litres/person/day. Consequently, it is recommended that planning conditions be imposed to ensure that the development achieves both requirements..

Other Matters

Archaeology

- 8.66 Whilst the site falls just outside an Archaeological Priority Zone, it is considered prudent to require an archaeological watching brief be put in place.

Contamination

- 8.67 The Council's Environmental Health Service has accepted the applicant's Ground Investigations Report and has recommended the imposition planning conditions to require remediation works to be undertaken to render the site fit for purpose.

Health

- 8.68 The scheme would ensure the creation of a healthy community with access to open space, promote cycling and walking and safeguarding a portion of the site for social interaction and community engagement.
- 8.69 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

- 8.70 Whilst it is accepted that the scheme would result in the partial loss of incidental open space/amenity land which contributes to the character of the immediate area, the value of the site (on balance) is outweighed by the provision of new homes and specifically affordable homes.
- 8.71 The design of the proposals has been well considered in terms of layout, scale, mass, external appearance and landscaping. The accommodation would comply with internal space standards, with all units being dual aspect and would provide a high standard of accommodation overall. With the exception of loss of sunlight to one neighbouring garden, which when considered in the balance is deemed acceptable, there would be minimal impact on the immediate neighbours and there is capacity on street to accommodate overspill car parking demand.
- 8.72 All other relevant policies and considerations, including equalities, have been taken into account.