

**PART 6: Planning Applications for Decision**

**Item 6.1**

**1. SUMMARY OF APPLICATION DETAILS**

Ref: 20/01174/FUL  
 Location: 126 Foxley Lane And 1 Woodcote Drive, Purley, CR8 3NE  
 Ward: Purley and Woodcote  
 Description: Demolition of two existing properties and erection of two buildings ranging from 2 - 5 storeys, comprising 41 flats including provision of car parking, associated amenity areas, hard and soft landscaping as well as refuse and cycle storage.  
 Drawing Nos: FOL-0BA-00-ZZ-DR-A-0100 WIP, FOL-0BA-00-ZZ-DR-A-0101 WIP, FOL-0BA-00-ZZ-DR-A-0200 WIP, FOL-0BA-00-ZZ-DR-A-0201 WIP, FOL-0BA-00-ZZ-DR-A-0202 WIP, FOL-0BA-00-ZZ-DR-A-0250 WIP, FOL-0BA-00-ZZ-DR-A-0251 Rev B, FOL-0BA-00-ZZ-DR-A-0252, FOL-0BA-00-ZZ-DR-A-0253 Rev B, FOL-0BA-00-ZZ-DR-A-0254, FOL-0BA-00-ZZ-DR-A-0300 WIP, FOL-0BA-00-ZZ-DR-A-0301, FOL-0BA-00-ZZ-DR-A-0302, FOL-0BA-00-ZZ-DR-A-0300 Rev A, FOL-0BA-00-ZZ-DR-A-0370 Rev A, FOL-0BA-00-ZZ-DR-A-0373 Rev A, FOL-0BA-00-ZZ-DR-A-0450 Rev A, FOL-0BA-00-ZZ-DR-A-0450 Rev A, FOL-0BA-00-ZZ-DR-A-0451 Rev A, FOL-0BA-00-ZZ-DR-A-0452 Rev A, FOL-0BA-00-ZZ-DR-A-0453 Rev A, FOL-0BA-00-ZZ-DR-A-0454 Rev A, FOL-0BA-00-ZZ-DR-A-0455 Rev A, FOL-0BA-00-ZZ-DR-A-0456 Rev A, FOL-0BA-00-ZZ-DR-A-0457 Rev A, FOL-0BA-00-ZZ-DR-A-0458 Rev A, FOL-0BA-00-ZZ-DR-A-0600 Rev B, FOL-0BA-00-ZZ-DR-A-0710, FOL-0BA-00-ZZ-DR-A-0711, FOL-0BA-00-ZZ-DR-A-0712  
 Applicant: CR8 Three Limited  
 Case Officer: Tim Edwards

	1b, 2p	2b, 3p	2b, 4p	3b, 4p	3b, 5p	3b, 6p	4b, 6p	8 bed care home	Total
Existing Provision							1	1	1
Affordable Housing Provision	1	5		7					13
Market Housing	4	4	11	5	3	1			28
<b>Total Proposed</b>	<b>5</b>	<b>9</b>	<b>11</b>	<b>12</b>	<b>3</b>	<b>1</b>			<b>41</b>

Number of car parking spaces	Number of wheelchair accessible car parking spaces	Number of cycle parking spaces
21	4	88

- 1.1. This application is being reported to Planning Committee in accordance with the following committee consideration criteria:
- Objections above the threshold in the Committee Consideration Criteria
  - The scheme was referred by Councillor Scott, in his role as vice-chair.

## 2. 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) Affordable housing – 30% by habitable room with a 20/80 split between affordable rent and intermediate housing;
  - b) Retention of scheme architects;
  - c) Local Employment and Training Strategy and contributions;
  - d) Financial contribution towards air quality;
  - e) Financial contributions towards sustainable transport measures in the immediate area, calculated at £61,500;
  - f) S278 and S38 Agreement for the implementation of the highway works;
  - g) Carbon offsetting contribution;
  - h) Monitoring fee; and
  - i) And any other planning obligations considered necessary.
- 2.2. That the Director of Planning and Strategic Transport has 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

### Pre-Commencement Conditions

3. Construction Logistics Plan;
4. Detailed drainage and SUDs strategy
5. Contaminated land site investigation.

### Pre-Commencement Conditions except for demolition and below ground work:

6. Details and samples of materials to be submitted for approval;
7. Landscaping and child play / communal amenity space and boundary treatment notably between private amenity spaces and communal areas;
8. Full details of cycle and refuse storage to be submitted for approval, including lighting details;
9. Biodiversity Enhancement Strategy including lighting;

#### Pre-Occupation Conditions

10. Delivery, servicing and waste management plan;
11. Car park management plan;
12. EVCP to be implemented on site;
13. Energy efficiency / sustainability;
14. Secured by design

#### Compliance Conditions

15. Accessible homes;
16. All proposed units to have access to all amenity areas irrespective of tenure;
17. Car parking provided as specified;
18. Visibility splays as approved;
19. Accord with the submitted Tree Protection Plan, Utilities Plan and Arboricultural Impact Assessment and submission of all tree monitoring reports to ensure compliance to the LPA.
20. Noise assessment mitigations
21. Air quality mitigations
22. Accord with Conclusions and Recommendations section of the submitted Preliminary Ecological Appraisal and Bat Survey;
23. Water efficiency; and
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 practice for Construction Sites;
4. Nesting birds in buildings/trees;
5. Light pollution;
6. Requirement for ultra-low NOx boilers;
7. Thames Water informatives regarding underground assets and public sewers;
8. Highways informative in relation to s278 and s38 works required.
9. Any other informative(s) considered necessary by the Director of Planning and Strategic Transport.

### 3. PROPOSAL AND LOCATION DETAILS

#### Proposal

3.1. The proposed development involves:

- The demolition of the two detached buildings.
- The erection of two buildings up to 6 storey's in height, comprising 41 homes
- 21 car parking spaces with associated hard and soft landscaping.
- Provision of associated internal refuse and cycle stores.

3.2. During the course of the application amended plans have been received, however these did not significantly alter the proposal and were therefore not consulted upon. The main alterations to the scheme have been as follows:

- Altering the internal arrangements and unit mix by changing two of the originally proposed 13 x 2b, 4p units to an additional one bedroom and 3 bedroom unit.
- Altering the private amenity spaces.
- Increasing the proposed affordable housing offer from 15% to 30% by habitable room.



Figure 1: CGI of the proposed development (with prominent corner tree omitted)

## **Site and Surroundings**

- 3.3. The site comprises of two large detached buildings, with 126 Foxley Lane fronting onto this road with its existing in and out drive accessible from Foxley Lane. 1 Woodcote Drive is located on the corner of Foxley Lane and Woodcote Drive, where its existing vehicular and pedestrian access is located.
- 3.4. The site is primarily flat throughout with the site noted to have a number of protected trees within the sites boundaries and play an important role within the wider area.
- 3.5. The northern side of Foxley Lane, within this immediate area, is primarily made up of large detached buildings with deep plots, whilst directly opposite on the southern side of Foxley Lane detached and semi-detached properties within in-fill developments are more common. Woodcote Drive is similar, with tree lined streets and large detached buildings.
- 3.6. The site is not located with an Conservation Area nor local heritage area, however the Upper Woodcote and Webb Estate Conservation Area is noted to be located behind the southern side of the properties on Foxley Lane.
- 3.7. The site is located 1.5 kilometres from Purley District Centre within a Public Transport Accessibility Level (PTAL) of 1b. There is an existing cycle lane located at the front of the site and which leads towards the district centre.
- 3.8. The site is located within an area at risk from surface water and ground water flooding.



*Figure 2: Aerial View for the site's location.*

## **Planning History**

- 3.9. Relevant planning history associated with the sites:  
126 Foxley Lane
  - 90/0369/P – Erection of a two storey building for use as a nursing home; provision of 5 parking spaces. **Permission granted and implemented.**
  - 19/05884/FUL - Conversion of care home (C2 use) to a 10 person HMO (sui generis use). **Permission granted but not implemented.**



- 20/01950/FUL - Change of use of property from a care home (C2 use) to a single family dwelling (C3 use), new external bin store. **Permission granted but not implemented.**

Combined History on both sites:

- 17/04657/FUL - Demolition of existing buildings: erection of three storey building comprising 21 special care residential units and provision of associated facilities. **Permission granted, not implemented but still extant.**



*Figure 3: Site Layout (left) and Proposed Elevations (right) from extant consent (17/04657/FUL)*

3.10. Applications of interest within the immediate surrounding area are detailed below:

87 - 89 Foxley Lane

- 20/02239/FUL - Demolition of two existing dwellinghouses; construction of a block of flats comprising of 23 units and a terrace of 5 dwellinghouses to the rear; together with vehicle and cycle parking, refuse storage and hard and soft landscaping.- **Permission Refused.**

95 and 95a Foxley Lane

- 18/02613/FUL - Demolition of 95 & 95A Foxley Lane: Erection of a two/three storey building to provide a 72 bedroom Care Home with associated external works and parking area to the front. **Permission granted and under construction.**

122 Foxley Lane

- 16/00152/P - Alterations; conversion to form 3 one bedroom, 1 two bedroom and 1 three bedroom flats; erection of single/two storey extension; provision of associated parking. **Permission granted and implemented.**

3 Woodcote Drive

- 18/05264/FUL - Demolition of existing house and erection of three storey building comprising 8 flats with associated parking, cycle store, refuse store and landscaping. **Permission granted and under construction.**

6 Woodcote Drive

- 20/00769/FUL - The demolition of existing property and the construction of flatted block comprising 14 flats, associated car parking spaces, refuse and cycle storage, hard and soft landscaping. **Permission Refused.**

#### 8 Woodcote Drive

- 20/00277/FUL - Demolition of existing detached dwelling and garage. Erection of a detached three storey property comprising nine flats, formation of new access, provision of car parking, cycle storage, refuse and recycling store and hard and soft landscaping. **Permission granted but not implemented.**

## 4. SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The principle of intensified residential development is acceptable given the national and local need for housing.
- The proposal includes 30% affordable housing and is the maximum reasonable level of affordable housing currently deliverable in view of the schemes viability.
- The proposal provides an acceptable unit mix, with appropriate level of family units based upon the viability of the scheme.
- The proposed design and appearance of the scheme would be acceptable;
- The living conditions of adjacent occupiers would be protected from undue harm subject to conditions.
- The proposed residential development would provide quality accommodation for future occupiers and amenity provision.
- The level of parking and impact upon highway safety and efficiency would be satisfactory.
- Sustainability aspects have been properly assessed and their delivery can be controlled through planning obligations and planning conditions.

## 5. CONSULTATION RESPONSE

- 5.1. Lead Local Flooding Authority (LLFA): The LLFA originally objected to the scheme, however additional details have been submitted and reviewed. The LLFA have therefore have removed their objection subject to planning conditions relating the detailed design of the site being provided prior to commencement of on-site works.
- 5.2. Thames Water: No objection subject to proposed informative relating to water pressure being added to the proposal.
- 5.3. Place Ecology: No objection subject to securing biodiversity mitigation and enhancement measures.
- 5.4. Secure By Design: No objection subject to conditions relating to secure by design to be secured.
- 5.5. The views of the Planning Service are expressed in the MATERIAL PLANNING CONSIDERATIONS section below.

## 6. LOCAL REPRESENTATION

- 6.1. The application has been publicised by 22 letters of notification to neighbouring properties, site notices and press notice.
- 6.2. The number of representations received from in response to notification and publicity of the application are as follows. It is noted that there are multiple entries submitted by the same objectors:  
 No of individual responses: 34      Objecting: 34      Supporting: 0
- 6.3. 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	Response
<b><i>Principle of development</i></b>	
Overdevelopment and intensification of the area with the surrounding developments currently constructed and/or with planning approval near Foxley Lane.	Each application is assessed on its own merits and issues with accumulated impact on parking had been taken into account. Please see paragraphs 8.2 – 8.14 and 8.49 – 8.61 for detailed considerations
Loss of a family buildings	The proposal would provide 16 three-bedroom dwellings and 27 family units in total. Please see paragraphs 8.2 – 8.14 for detailed considerations
Flats are not needed in this location	Unclear where the opinion is based on.
<b><i>Design</i></b>	
The proposed modern design and is not in keeping with the character of the area.	Please see paragraphs 8.15 – 8.28 for detailed considerations
The proposed massing is bulky and out of keeping with the context	Please see paragraphs 8.15 – 8.28 for detailed considerations
The proposed building is too high.	Please see paragraphs 8.15 – 8.28 for detailed considerations
<b><i>Neighbour Amenity</i></b>	
Proposed leads to loss of privacy, loss of light and overbearing impact onto neighbouring properties.	The impact of the development onto all adjoining properties is considered acceptable and discussed further within paragraphs 8.41 – 8.48 for detailed considerations



Impact on amenities of adjoining occupiers in regards to noise and pollution	Officers are satisfied that the proposal would not impact the amenities of adjoining occupiers as per the assessment within this report.
<b><i>Traffic &amp; Parking</i></b>	
Insufficient parking and overspill onto the adjoining streets which are under existing parking stress.	Please see paragraphs 8.49 – 8.62 for detailed considerations
Emerging traffic will pose a hazard to the surrounding area.	Please see paragraphs 8.49 – 8.62 for detailed considerations
The parking assessment does not take into account the cumulative impact of development.	Please see paragraphs 8.49 – 8.62 for detailed considerations
<b><i>Impact on Tree and Ecology</i></b>	
Impact upon biodiversity and natural landscape.	Please see paragraphs 8.63 – 8.65 for detailed considerations.
The proposal impacts mature trees on-site.	Please see paragraphs 8.63 – 8.65 for detailed considerations.
<b><i>Other matters</i></b>	
The proposed development does not accord with the draft Croydon Plan as the site is not within 800 metres of a railway station.	Each application is assessed on its own merits, in relation to the relevant planning policies and guidance at the time. Any update to the Local Plan are currently draft and not adopted policy to which this proposal can be considered against.
It is common knowledge that the current targets are out of step with the revised London Plan.	Please see paragraphs 6.10 – 6.12 for detailed considerations.
Limited affordable housing is provided.	Each application is assessed on its own merits, in relation to the relevant planning policies and guidance at the time. The proposed affordable housing offer on-site has increased accordingly

	during the application submission. This is discussed further within paragraphs
Where is the outdoor communal play area or gardens? The size of the amenity area is inadequate.	There would be one primary communal area provided between the two blocks although there would be breakout spaces within the site, which adhere with the relevant policy expectations on size and indicative design, with details proposed to be secured via condition.
Impact on local infrastructure such as schools, and local surgeries.	The application would be liable for CIL payment which would contribute to delivering infrastructure to support the development of the borough.
Impact upon the safety of local school children.	A condition will be imposed requiring a Construction Logistics Plan to ensure construction activities do not cause undue disturbance to the highway network.

6.4. The Purley and Woodcote Residents Associations (PWRA) have objected to the application, raising the following (summarised) planning related concerns:

- Loss of a family home, whilst the proposed development would not contribute to providing family accommodation.
- Overdevelopment of the site with the proposed development significantly increasing the built area of the existing family home
- Overdevelopment of the site resulting in inadequate amenity space for potential occupiers
- The design is totally out of keeping with the locality and surrounding townscape, as a result of its massing, form (incl height), and overall appearance.
- Detrimental to the amenity of occupiers of adjoining properties. Given the size and scale of this proposed development the occupiers of neighbouring properties will suffer visual intrusion, increased noise and, for those adjacent to the proposed development, loss of privacy.
- Inadequate car parking for a development of the size and scale proposed, resulting in additional on street parking, putting parking pressure on the surrounding area, and increased traffic movements so greatly endangering road safety.

## 7. RELEVANT PLANNING POLICIES AND GUIDANCE

7.1. In determining any planning application, the Council is required to have regard to the provisions of its Development Plan so far as is material to the application and to any other material considerations. Such 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 2016, the Croydon Local Plan (February 2018), and the South London Waste Plan 2012.

7.2. Government Guidance is contained in the National Planning Policy Framework (NPPF) revised 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:

- Promoting sustainable transport;
- Delivery of housing
- Promoting social, recreational and cultural facilities and services the community needs
- Requiring good design.

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

7.4. Consolidated London Plan 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
- 5.7 Renewable energy
- 5.10 Urban greening
- 5.12 Flood risk management
- 5.13 Sustainable drainage
- 5.14 Water quality and wastewater infrastructure
- 5.15 Water use and supplies
- 5.16 Waste net self sufficiency
- 5.18 Construction, Demolition and excavation waste
- 6.3 Effects of development on transport capacity
- 6.9 Cycling
- 6.10 Walking
- 6.11 Smoothing traffic flow and tackling congestion
- 6.12 Road Network Capacity
- 6.13 Parking
- 7.6 Architecture
- 8.3 Community infrastructure levy

7.5. Croydon Local Plan (adopted February 2018)

- SP1 – The places of Croydon
- SP2 – Homes
- 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
- DM24 – Land contamination
- DM25 – Sustainable drainage systems and reducing flood risk
- SP7 – Green Grid
- DM27 – Biodiversity
- DM28 – Trees
- SP8 – Transport and Communications
- DM29 – Promoting sustainable travel and reducing congestion
- DM30 – Car and cycle parking in new development
- DM42 – Purley

7.6. Suburban Design Guide Supplementary Planning Document (SPD) 2019

7.7. The SPD is a Housing Design Guide that provides guidance on suburban residential developments and extensions and alterations to existing homes across the borough. The SPD is a design guide for suburban developments likely to occur on windfall sites where existing homes are to be redeveloped to provide for several homes or proposals for building homes in rear gardens.

7.8. Other relevant Supplementary Planning Guidance as follows:

- London Housing SPG, March 2016
- National Technical Housing Standards, 2015
- National Planning Practice Guidance

7.9. Emerging New London Plan

7.10. 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. The Secretary of State has commented on the Mayor's Intend to Publish version and so it would appear to be nearing adoption. 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.

7.11. 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.

- 7.12. It is important to note, should the Secretary of State support 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.
- 7.13. 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. MATERIAL PLANNING CONSIDERATIONS**

8.1. The principal issues of this particular application relate to:

- The principle of the Development
- Affordable Housing and Housing Mix
- The Design and its Impact on the Character of the Area
- The Quality of the Proposed Residential Accommodation
- Impact on Neighbouring Amenity
- Impact on Highways, Parking and Refuse Provision
- Impacts on Trees and Ecology
- Sustainability and Environment
- Environmental Health

### **Principle of Development**

#### Proposed Land Use:

- 8.2. Paragraph 11 of the NPPF 2018 applies a presumption in favour of sustainable development which means approving development proposal which accords with an up-to-date development plan without delay. Paragraph 68 acknowledges the contribution of small and medium size sites can make in meeting the housing requirements and supports the development of windfall sites.
- 8.3. The above policies are clearly echoed within Policy SP2.1 of the Croydon Local Plan (2018) (CLP 2018) while Policy SP2.2 commits to the delivery of 10.060 homes across the borough's windfall sites.
- 8.4. The site is a windfall site which could be suitable for sensitive renewal and intensification. The proposal is for a residential scheme within a residential area; it would comprise 41 flats which would accord with national and local policies. Accordingly, the proposed land use would be acceptable in principle.

#### Loss of Existing and Proposed Land Use:

- 8.5. The existing lawful use of 126 Foxley Lane as a C2 care home is not protected in policy terms and therefore in principle the change of use from C2 to C3 is acceptable in principle.
- 8.6. Whilst 126 Foxley Lane is not currently in use as C3 use (there is has extant consent to return to this to C3 use as a single dwelling or to change the use to an HMO for 10 people). Therefore, taking this into account as well as 3 Woodcote Drive, being a single family dwelling, Policy DM1.2 of the CLP 2018 is relevant. The policy permits residential redevelopment where it would not result in the net loss of three-bedroom homes or the loss of homes smaller than 130 sqm. 126 Foxley Lane has a gross internal area (GIA) of 277 sq m. 1 Woodcote Drive is a four bedroom home with a GIA floor area of approximately 265 sq m. 27 family homes are proposed as part of the development and therefore the proposal would be in accordance with the requirements set out by Policy DM1.2.

#### Density:

- 8.7. The site falls in a suburban setting under The London Plan (2016) terms and has a PTAL score of 3. Table 3.2 of The London Plan identifies the optimum sustainable residential quality density; this table sets the density for such setting within a range of 150-200 hr/ha. The proposal would result in a density of 529hr/ha, which officers note exceeds the matrix.
- 8.8. 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 challenges notably to provide a high level of family units as well as respond to the existing protected trees on-site.
- 8.9. In summary, the proposed residential use and its density would be acceptable in principle. The proposal would accord with the National and Local requirements and would optimise the delivery of additional housing in the borough.

#### **Affordable Housing and Housing Mix**

##### Affordable Housing:

- 8.10. Policy SP2 of 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. CLP Policy SP2.5 requires a minimum provision of affordable housing to be provided preferably as a minimum level of 30% affordable housing on the same site as the proposed development.



- 8.11. A full viability appraisal accompanied the submitted documents for the planning application which concluded that the development could either provide 15% on site affordable housing, with a 60/40 split between affordable rent and intermediate affordable housing or provide 30% shared ownership homes on-site. This appraisal was subject to a third party review which initially considered that a total of 18 units (or 43% affordable housing by units) could be provided with a (60/40 split per unit). However these were based upon the affordable rented units being capped at 80% of market rents not London Affordable Rent (LAR), which the LPA seeks to secure given their greater affordability to local residents.
- 8.12. These assumptions were challenged by the applicant, providing additional information in regards to the contingencies proposed, the site specific costs associated with protecting the large number of mature and protected trees on-site as well as providing an independent quantity surveyors full measured cost plan relating to the proposed building costs on-site. This was then reviewed by an independent third party which agreed with the additional details set out. Taking this into account, the follow-up review concluded that the development could provide 8 units at a 60/40 split (however the 5 rented units would not be the LAR tenure). An alternative scenario was tested, based solely on providing LAR units by habitable rooms would equate to 4 units or 13 habitable rooms. This would be 9.7% of the habitable rooms across the site being viable to be delivered as affordable housing provision.
- 8.13. Following this independent review and discussion between the developer and the LPA, an improved offer of 30% affordable housing by habitable rooms with a 20/80 split between LAR and Shared Ownership units has been proposed. This equates to 13 affordable units being provided on site of which 2 are LAR and 11 are intermediate. Whilst the split does not adhere with local Policy SP2, considering the scheme has been shown to only be able to viably provide 8 units, an offer of 13 units (or 30% by habitable room), including LAR units is considered by officers to be a good outcome.

#### Housing Mix:

- 8.14. Policy DM1.1 of the Croydon Local Plan (2018) requires major developments to have a minimum amount of three-bedrooms in accordance with Table 4.1 except for where there is an agreement with an approved registered provider for a specific mix; this policy also allows an element of two-bedroom/four-person dwellings as a substitute. Table 4.1 of Policy DM1.1 states that an suburban setting with PTAL 1 should have 70% minimum percentage of three-bedrooms or larger.
- 8.15. 27 of the 41 units (approx. 66%) would be family units, including 2bed-4person units. Whilst the unit mix is lower than what DM1.1 sets out, considering the proposed affordable housing offer and viability of the scheme discussed above it is notable that providing larger units would further affect the viability of the scheme and therefore the proposed affordable housing offer. The scheme continues to provide 11 x 2b, 4p; 12 x 3b, 4p; 3 x 3b, 5p and 1 x 3b, 6p units allowing for a varied and sustainable community for families of differing sizes. The proposed level of family housing provided on-site is therefore supported accordingly.

## Townscape and Visual Impact

- 8.16. The existing buildings do not hold any special significant architectural merit and are neither locally nor statutorily listed. Therefore there is no objection to their demolition.
- 8.17. The site is located on the corner of Foxley Lane and Woodcote Drive. The site has a green frontage and prominent trees play an important part in the local character of the site. The proposal has been accompanied by a detailed contextual analysis which has considered the site, the surrounding area and how their proposed design concept has evolved from this analysis. Unlike other sites on Foxley Lane, the site is set back from the road by a wide pavement, as well as being directly opposite a small green space which further adds to the character of this element of the street.

### Site Layout

- 8.18. The site has a vast number of existing trees on-site, a number of which are formally protected, primarily around the boundaries of the site. The proposed layout of the site has taken into account the prominent, high quality trees and located the two blocks in appropriate locations, to ensure the high quality trees are retained and that the character of the area, whilst altered, continues to be defined by mature, prominent trees.



*Figure 4: Proposed Site Layout*

- 8.19. As seen in figure 4, the proposal aims to respond to the site and address the corner, with block A responding to 128 Foxley Lane whilst Block B being a corner building addresses the point of the site. This approach is considered appropriate.

### Scale, Height, Massing and Design

- 8.20. The building characteristics seen throughout Foxley Lane vary notably and there is no one distinct scale or mass, with a number of smaller in-fill houses

having been consented primarily on the southern side of the road and then two storey detached houses or three/four storey flatted blocks on the northern side.

8.21. As set out a design led approach has been undertaken to holistically consider this site. As seen in figure 5, this included looking at long sections of Foxley Lane, understanding the gaps between buildings, the proposed prominence of roof forms throughout the street and then responding to these key characteristics within their design.

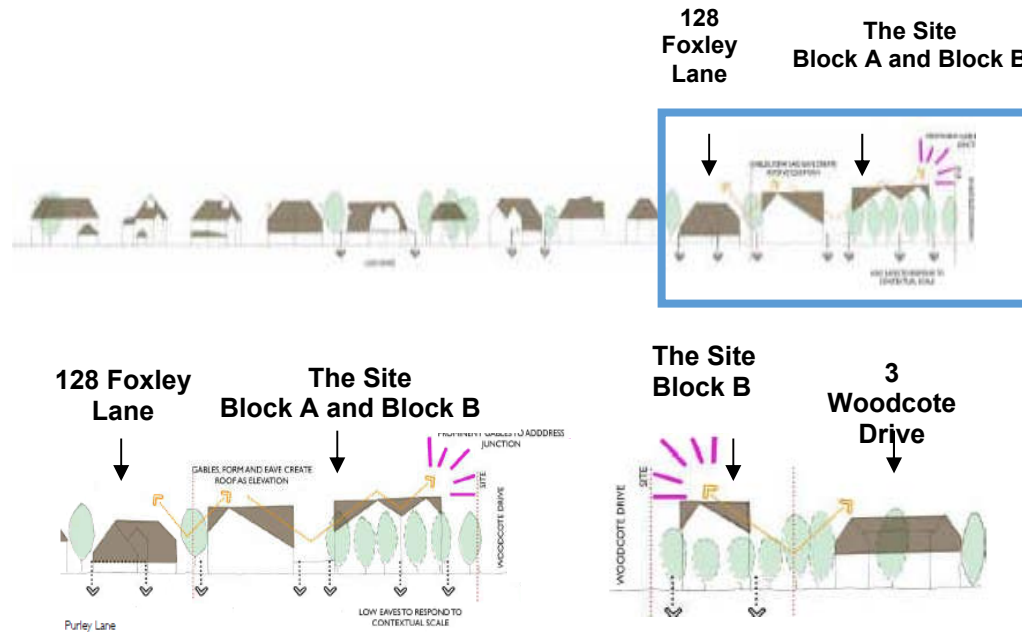


Figure 5: Foxley Lane Long streetscene elevation (top), Immediate Foxley Lane Streetscene (bottom left) and Woodcote Drive Streetscene (bottom right)

8.22. The proposed use of two blocks, linked by a single storey element between the sites allows the proposal to appear as two buildings which respect the sites' individual histories, as well as respecting the typical gaps seen throughout the built form and is shown within figure 6.

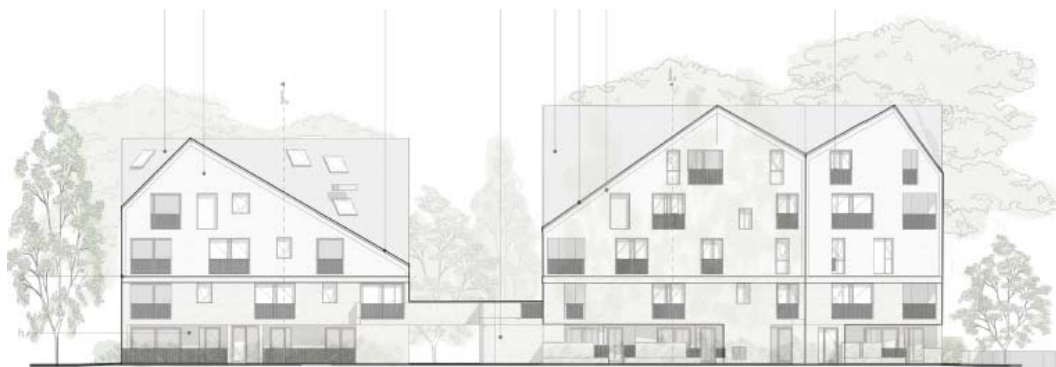


Figure 6: Streetscene elevation of the development from Foxley Lane (with trees omitted)

8.23. The proposed development site is a corner plot and therefore has taken into consideration the suburban design guidance which sets out "Redevelopment of corner plots to provide new dwellings, including extensions or conversions should seek to include an (1) additional storey to the 3 storeys recommended

*in the Croydon Local Plan Policy DM10.1. Some corner plots may be able to accommodate further height provided the massing is responsive to neighbouring properties”.*

- 8.24. The proposed height of the development has carefully been considered taking into account the respective form and height of adjoining properties. Noticeably Block A adjacent to 128 Foxley Lane, (a two storey detached property) is a four storey block with accommodation within the roof space which responds to its neighbour in both its proportions, roof form and separation distances between boundaries which allows the building to sit comfortable adjacent to this adjoining property within detrimentally impact the character of the area. Block B being located directly on the corner of the two roads responds to the currently in construction three storey flatted block at 3 Woodcote Drive as well as Block A and so its step up in height to five storeys (with accommodation again based within the roof) is supported. In this context, the proposed massing and height responds to the directly adjoining properties in a positive manner.
- 8.25. As detailed in the planning history section of this report the site has extant consent for a care home across the two sites. The site layout is similar in form, although notably the proposed scale and massing have altered. However, that application (ref. 17/04657/FUL) was submitted in October 2017, prior to the adoption of the Croydon Local Plan 2018 as well as the Suburban Design Guide which this application is now been considered against.
- 8.26. Therefore, overall the proposal is considered to create a denser form of development which responds to the evolving character of the streetscene in its massing, scale and height.
- 8.27. The proposal is considered to be a ‘contemporary re-interpretation’ to the existing buildings within the area, utilising asymmetrical pitched roofs with low eaves, gable projections and prominent materials such as light colour brick to reflect render which is seen within the existing building at 126 Foxley Lane as well as across the wider area. Two colourations are proposed within the brick work, taking into account the horizontal banding of the elevations which are common within the wider streetscene. Textured brick and solider course detailing alongside recessed fenestration and balconies further add depth and fine detail (as demonstrated by figure 7). The interesting roof forms, well considered elevations and good levels of detailing have been carefully considered throughout the design process and add interest to all



*Figure 7 – Proposed detailed section CGI*



elevations and result in a high quality interesting building which marks the corner plot.

### Heritage

- 8.28. Whilst the site is not located within the Upper Woodcote and Webb Estate Conservation Area, the streets around the Webb Estate complement many of its important characteristics such as density, building typology, generous plots with landscaping, architectural styles and materials.
- 8.29. Whilst there would be an increase in height and bulk from this development, in comparison to the existing situation the layout and massing of the new buildings has been carefully designed to reflect the original pattern of development. As part of the application, the relationship between the site and the conservation area has been demonstrated. At its closest point between the southern boundary of the site and the boundary of the conservation area, there would be approximately a 70 metres separation with buildings located in between. Taking this separation into account, the existing significant landscaping between the conservation area and the site as well as the existing and approved built form, overall the visibility to and from the conservation area is considered to minimal. Therefore the proposal is considered to respect the local character and the setting of the nearby conservation area.



*Figure 8: CGI image of the development (left - NE towards the site from Foxley Lane and right – the corner element between Foxley Lane and Woodcote Drive (existing trees omitted)).*

- 8.30. As set out by the local plan policy DM10, the cumulative impact of development must be considered. In this circumstance the proposal is considered to be a high quality design, which has not only considered but positively responds and reinforces the character of the local area whilst further defining and adding to the sense of place.

### **The Quality of the Proposed Residential Accommodation**

#### Internal Areas:

- 8.31. Policy SP2.8 of the CLP (2018) states that the Council would require new homes to achieve the minimum standards set out in the Mayor of London Housing Supplementary Planning Guidance (SPG) and National Technical Standards (2015) (NTS (2015)) or equivalent.

- 8.32. 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, barring flat 3 on the ground floor. However, this is a south facing so will continue to receive good quality daylight and sunlight (discussed further below) as well as having acceptable outlook.
- 8.33. The planning application was accompanied by a daylight assessment which had tested 8 units from across the development. Of these 8 units reviewed, the one single aspect unit (highlighted above) was assessed as well as 7 other units from across a number of the unit's types and floors including flat 1 located on the ground floor and being north-west in its aspect. All of the units tested are shown to provide good levels of daylight for future occupiers and this is considered to be an accurate depiction of the proposed daylight levels across the development.
- 8.34. In addition, it is considered that the proposed design provides for light and well ventilated residential accommodation, appropriate floor to ceiling heights.
- 8.35. 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.

#### Accessibility:

- 8.36. London Housing SPG (2015) states that 90% of new-build housing should meet Building Regulation requirement M4(2) 'Accessible and Adaptable Dwellings' with the remaining 10% meeting Building Regulation requirement M4(3) 'Wheelchair User Dwellings' unless viability has shown accordingly. Policy SP2.8 of the CLP (2018) states that the Council would ensure that new homes in Croydon meet the needs of residents over a lifetime.
- 8.37. The proposed buildings each have their own cores with lifts included. The applicant has stated that 4 units across the development are proposed to be M4 (3) and are all located on the ground floor level. This would equate to 9.75% of the units meeting this standard. However it is noted that all of the 6 units on the ground floor could be secured as M4 (3) and therefore it is proposed that an additional unit is secured by condition to be adaptable for M4 (3) standards should it be required by future occupiers (to meet policy expectations). All other units are proposed to meet M4 (2) whilst all external spaces would be located at the same level as the internal ground floor and therefore the site is fully accessible which is supported accordingly.

#### Relationship between Blocks

- 8.38. The proposed relationship between blocks has been carefully considered and amended during the application process. There would be an approximate 9 metre separation between the blocks. At first floor level due to the location of private amenity spaces further amendments have been required to ensure that these amenity spaces as well as habitable windows which look onto this space are not concentrated within the same space. As figure 9 details, the amenity spaces and windows have now been staggered to restrict overlooking between units 12, 14 and 17. These units all have outlook or aspect in another direction as well as towards this space between the buildings. This is considered to be acceptable with further details proposed to be secured via condition in regards to landscaping.



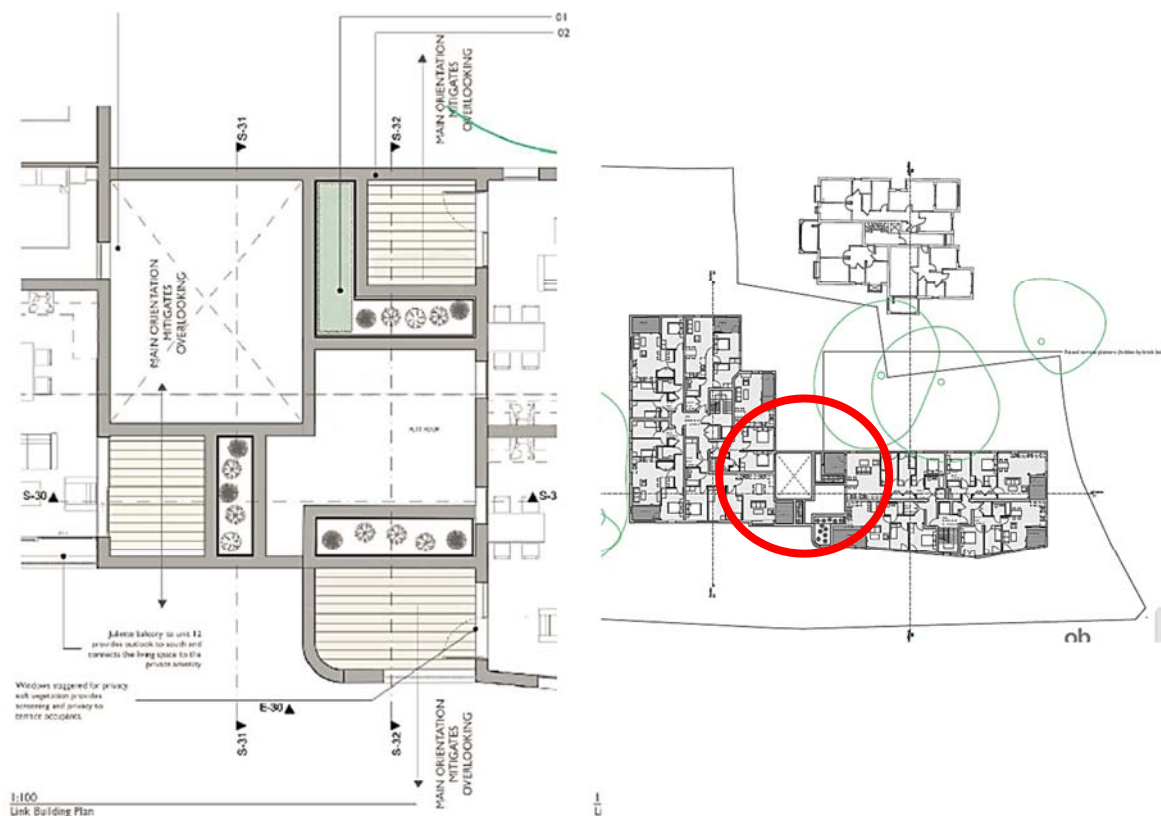


Figure 9: Relationship between units 12, 14 and 17 (left) and proposed first floor plan (right)

Amenity Areas and Play Space:

- 8.39. Policy DM10.4 of the CLP (2018) states that all new residential development will need to provide private amenity space, this space should be functional with a minimum depth of 1.5 metres and a minimum area of 5 sqm per 1-2 person unit and an extra 1 sqm per extra occupant thereafter.
- 8.40. All of the units would meet or exceed the minimum private amenity areas in accordance with Policy DM10.4. Further details in relation to the proposed defensible planting treatment indicatively highlighted on the submitted plans would be conditioned to be provided as part of a detailed landscaping plan.
- 8.41. In addition to the private amenity areas, the development would provide a communal area with playspace opportunities at the rear of the site. Considering the scale of development and the proposed affordable housing provision the development should provide 226 sqm of play space for the scheme, which can be accommodated on the site. The proposed central communal space (highlighted below in figure 7) would provide the main communal space and child play space whilst the site provides further opportunities for break out spaces to be provided within the south eastern corner at the base of the prominent TPO trees as shown within the images in figure 10. Whilst these are just indicative images at this stage, it is consider that these images demonstrate

appropriately how these spaces could work with further details proposed to be secured via a detailed landscaping condition



*Figure 10: Proposed Indicative Landscaping Strategy (left), indicative proposed communal/child playspace (top right) and other break-out/entry spaces (bottom right).*

- 8.42. Overall, the development is considered to provide an acceptable level of accommodation, private amenity and communal spaces for all future occupiers.

## Impact upon the adjoining occupiers

8.43. The properties most affected by the development would be the neighbours highlighted within figure 11.



Figure 11: Proposed site layout with adjoining occupiers

### 128 Foxley Lane

8.44. To the west of the site is 128 Foxley Lane, a two storey detached house. There would be an approximate 15 metre separation between the flank wall of Block A and this adjoining occupiers flank elevation of the main house not the existing garage. There are also noted to be a significant number of mature trees located along the boundary between the two sites, with fenestration located appropriately to ensure that any overlooking that may occur between the sites is minimal. Block A is noted to break the 45 line guidance in plan (although not in elevation), however from a distance of approximate 24 metre separation (as shown in figure 12). Taking into account the separation distance, proposed site layout, internal layout of the units and retention of existing mature trees overall the proposal is not considered to have a detrimental impact upon this adjoining occupier.

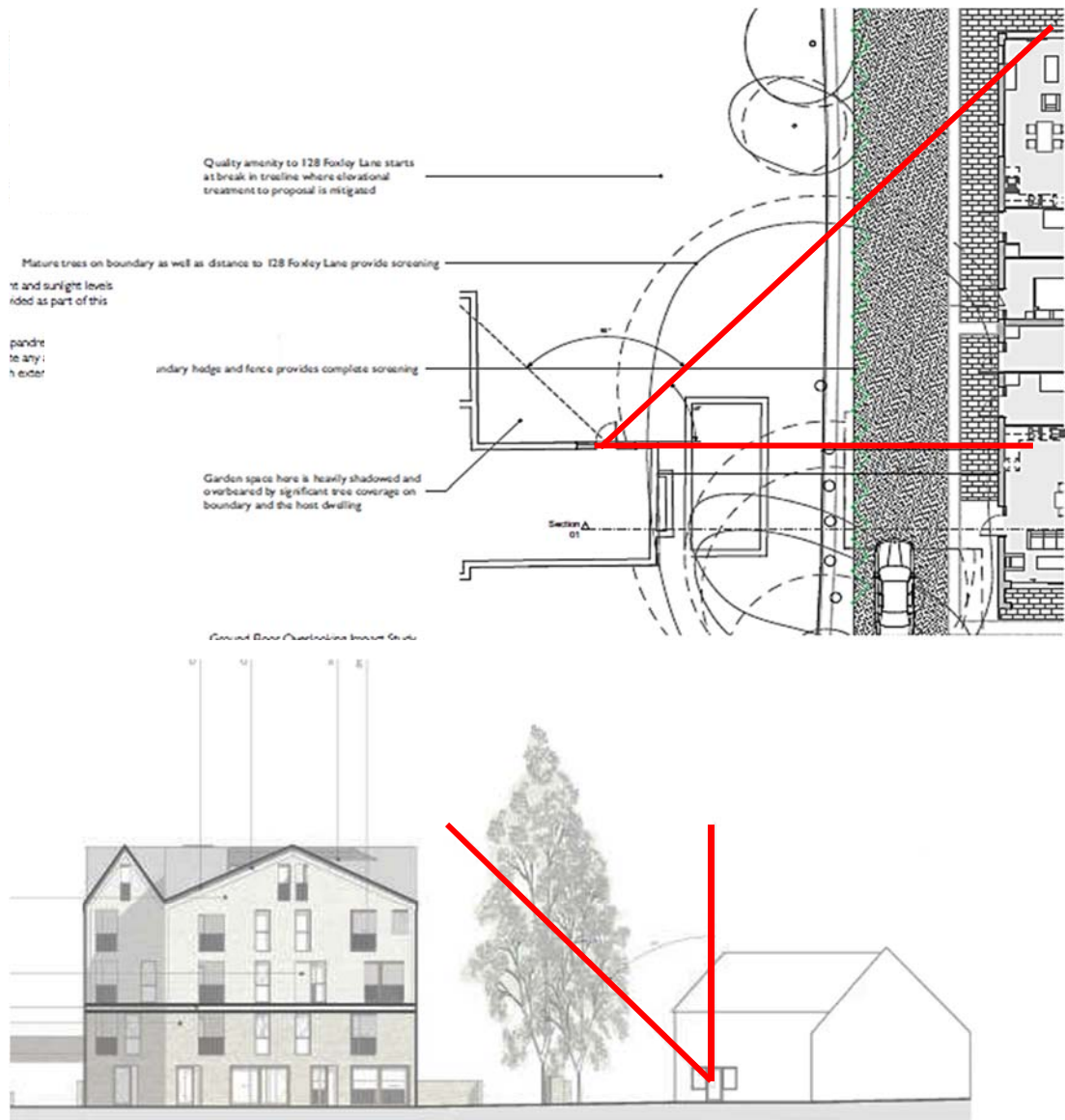


Figure 12: Relationship between Block A and 128 Foxley Lane (Top – In Plan and Bottom in Elevation (garage omitted for clarity))

### **3 Woodcote Drive**

- 8.45. As highlighted by the planning history surrounding the site, the adjoining property has previously been demolished with consent granted for a flatted scheme which is currently under construction. Due to the unusual nature of the site, it wraps around both the southern and western elevation of this adjoining site. However, there would continue to be a 19 metre separation from the proposed northern elevation of Block B and an approximate 10.70 metre separation between the northern elevation of Block A and the rear elevation of this adjacent flatted block seen within figure 13. However, it is important to note that the proposed rear elevation of Block A does not project beyond the southern elevation of the adjoining development – it is not immediately behind it. Taking into account these separation distances, the proposed offset site layouts, continued retention of significant mature trees along the northern boundary between the sites as well as the proposed internal layout restricting



overlooking at the closest point overall this relationship is considered acceptable.

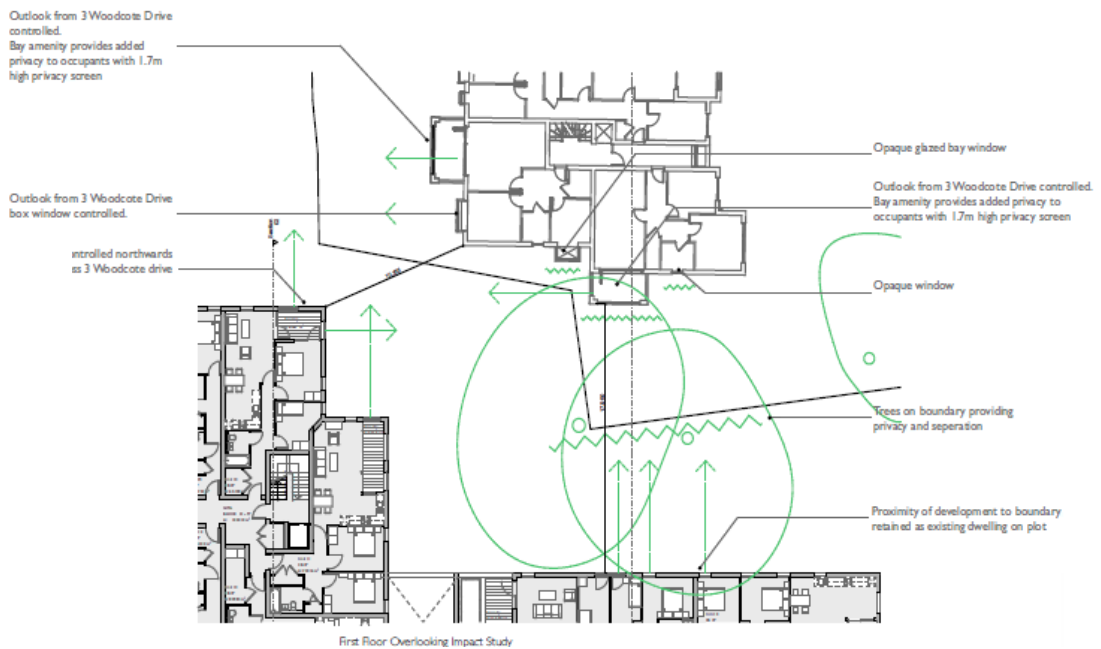


Figure 13: Separation distances between blocks A and B and flatted scheme at 3 Woodcote Drive)

### **1, 3 and 5 Green Lane**

- 8.46. There is an approximate 44 metre separation between the proposed rear elevation of Block A and that of 3 Green Lane (which is the closest point of separation between the proposed Block A and the neighbour properties within Green Lane). Taking into account this separation, level of screening retained along the rear boundary overall there is not considered to be a detrimental impact upon these adjoining occupiers.

### **122 Foxley Lane and 6 Woodcote Drive**

- 8.47. These two neighbours are located east of the site, on the opposite side of Woodcote Drive with there being an approximate separation of 23 metres between the eastern elevation of Block B and 122 Foxley Lane. There would be an approximate 35 metre separation from the same elevation to 6 Woodcote Drive, which is also offset from the proposed building. Taking into account this separation across a road overall there is not considered to be a detrimental impact upon these adjoining occupiers.

### **95 – 101a Foxley Lane**

- 8.48. Whilst the front building line on the southern section of Foxley Lane steps slightly from east to west, the separation between the site and these directly opposite properties would be approximately 42.5 metres. Taking into account this significant separation, overall there is not considered to be a detrimental impact upon these neighbours amenities.
- 8.49. It is important to note that 126 Foxley Lane's last lawful use was as a care home, as well as the extant consent across both sites for a larger care home. A care home use (falling within use class C2) is different to a C3 residential use and it notably creates visitors and staff at different times of the day. Therefore,

whilst the proposal would increase the number of residents on-site, the use would remain residential in nature, and as set out within the transport section below the proposal aims to discourage car ownership/useage. It is therefore not considered to detrimentally impact the amenities of the adjoining occupiers by way of noise or pollution associated with the development.

- 8.50. In summary, the proposal would not result in a significant adverse impact on adjoining neighbouring properties in terms of loss of privacy, overbearing impact or loss of sun and daylight, as per Croydon Local Plan (2018) Policy DM10.6 and the Croydon Supplementary Guidance (2019).

### **Transport, Parking and Access**

#### Parking

- 8.51. The site is located on the corner of Foxley Lane and Woodcote Drive which are adopted highways. The site has a PTAL rating of 1b which indicates poor accessibility to public transport, although the site is located in close proximity to local bus stops and existing advisory cycle lane situated along Foxley Lane, which provides access to Purley District Centre.
- 8.52. The London Plan sets out maximum car parking standards for residential developments based on public transport accessibility levels and local character. 1-2 bedroom units should provide less than 1 space per unit and 3 bedroom units up to 1.5 spaces per unit and for 4 bedroom units up to 2 spaces. However, it is important to note that Policy DM30 of CLP2018 states that development should provide parking for affordable homes at an average rate not less than 2/3 that of other tenures. Taking all this into account the maximum requirement for this development would be 39 parking spaces.
- 8.53. The proposal provides 21 parking spaces on-site of which 6 would be wheelchair accessible as highlighted by the applicant's submission. Therefore, the development would result in a maximum of 18 vehicles parking on the local road network in policy terms and if one to one parking were to be expected 20 vehicles could be located on-street. The applicant has undertaken an on-street parking survey to the recognised Lambeth methodology which shows that local parking stress was at 5% overnight (with 6 cars parked on-street) and rising to 28% (32 cars parked) at peak drop-off times for local schools. These surveys excluded Foxley Lane as an appropriate location for vehicles to park which is considered appropriate. However, taking this into account the worst case scenario where 20 vehicles are parking on-street, the overnight capacity would increase to 23% (with 89 parking spaces available).
- 8.54. Alongside considering the potential impact of this development, the potential cumulative impact of development in relation to parking availability should be considered. As highlighted within the planning history section of this report, there are notably two approved flatted developments within Woodcote Drive which provide 6 parking spaces on-site respectively. Therefore, in the worst case scenario of 1 to 1 parking ratio, with another 6 vehicles to be parked on-street the overnight parking stress would rise to 28%.
- 8.55. The transport assessment submitted with the proposal details that in the worst case scenario based upon for 41 homes would create 11 two way trips in the



morning and 9 two way trips in the PM. This is considered to have a negligible impact upon the highway network.

- 8.56. Considering the proposed parking provision and the sites location, the site has been designed to promote pedestrian movement with three pedestrian accesses to and from the site (both on Foxley Lane and Woodcote Drive) as well as providing resident and visitor cycle parking. The transport assessment submitted has included a healthy streets assessment to identify any potential challenges or issues which may deter pedestrian or cycling from the site to Purley District Centre. The assessment identified a number of points from the site to the District Centre which include poor quality dropped kerb, missing tactile paving, street furniture, car parking blocking the existing advisory cycle lane and sunken gully covers.
- 8.57. Considering the proposed parking levels, to discourage car ownership and encourage sustainable transport methods and, it is recommended that the following measures are secured through the S.106 Agreement process:
- A financial contribution of £61,500 towards
- (1) the placement of car clubs with Electric Vehicle Charging Points within low to moderate PTAL area,
  - (2) improved/enhanced cycling and pedestrian infrastructure
  - (3) removal parking permits from future occupiers should the site fall within a permit zone.
- 8.58. It is important to note the two refused schemes at 6 Woodcote Drive and 87 – 89 Foxley Lane (highlighted within the planning history section of this report) have been refused for the following highway reason *“Insufficient information has been submitted to justify the proposed parking provision...Therefore the proposal would be unacceptable in parking and highway safety terms contrary to DM29 and DM30 of the Croydon Local Plan (2018)”*. As stated in the officer report for both of these *“the Council aspiration for this element of Purley is 1 to 1 parking provision considering general sites’ constraints however with the desire to promote sustainable travel across the borough”*. However the refusal reason on both sites primarily relates to the lack of an appropriate car parking survey which clearly identifies whether the surrounding streets have capacity to cope with any overspill parking. This is significantly different to this application where appropriate surveys, in line with the Lambeth methodology have been undertaken alongside a detailed transport assessments as set out above. It is also important to note the difference between the Foxley Lane and this proposal, which also fronts onto Woodcote Drive and allows off-street parking to occur without detrimentally impact the highway network.

### **Access**

- 8.59. The proposed vehicular access would utilise the existing crossovers for 126 Foxley Lane although they are proposed to be improved accordingly. The site would have an ingress (western crossover) and egress (eastern crossover) when viewed from Foxley Lane which would be appropriately signed and secured via conditioned.
- 8.60. A number of the representations received have raised concern that the proposal may detrimentally impact the safety of school children accessing the local

schools. The nearest school, John Fisher School is located approximately 250 metres away from the site. The proposed access and manoeuvring within the site is considered acceptable with adequate sightlines having been provided alongside pedestrian visibility splays which are proposed to be conditioned accordingly. Taking these points as well as the low level of vehicle movements associated with the site and that the proposal does not impact upon pedestrian routes overall the proposal is considered acceptable.

- 8.61. Therefore, whilst there is notable potential for overspill parking from this development to happen onto the surrounding street as set out by the NPPF para. 109 “developments should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe”. As the parking surveys have demonstrated there is no capacity issues within the immediate area where there is unrestricted on-street parking, with appropriate sight lines and visibility splays as well as acceptable swept paths for vehicles to enter and exit in first gear.

#### **Electric Charging Points**

- 8.62. Policy DM30 states that 20% of parking bays should have EVCP with future provision available for the other bays. In line with the relevant policies, 5 parking spaces should be secured as active charging points and the other bays as passive provision by way of condition.

#### **Cycle Storage**

- 8.63. Cycle storage would be provided internally within the Block A, apart from for three ground floor units which Block B who will have their cycle storage located within their private entrances. The location of the proposed cycle store for future residents alongside additional visitor cycle parking areas externally throughout the development is considered acceptable further supporting enhanced sustainable transport measures. Full details are proposed to be secured via condition.

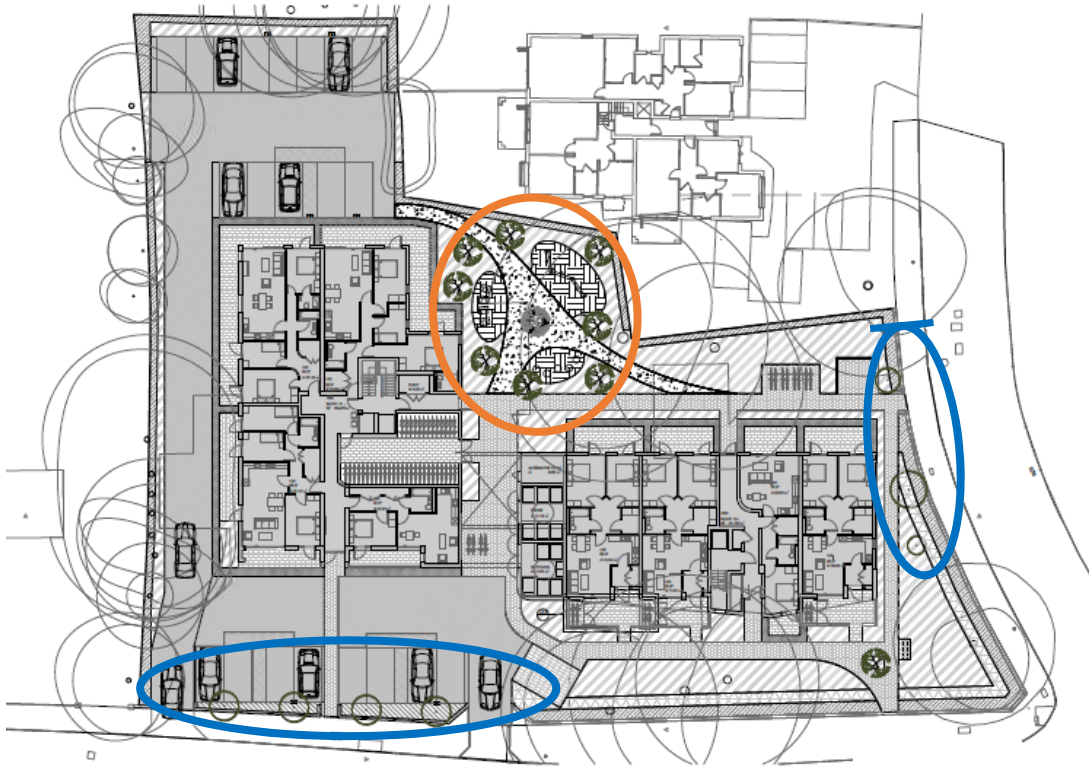
#### **Refuse Storage**

- 8.64. The proposed refuse store for both blocks would be located within the building envelope of Block B. The proposal sets out that refuse trucks will also enter and exit the site which is supported and welcomed. Further clarification including detailed swept paths in regards to the proposed refuse and servicing strategy for the site will be secured accordingly via condition.

#### **Trees and Ecology**

- 8.65. A number of trees on-site are currently protected by two tree preservation orders (TPO 3, 2001 and TPO 9, 1975). The proposal would see the removal of 5 groups of trees and 18 trees of which 2 are B graded (and located at the rear of the site and not considered worthy of protection) whilst the others are either C or U graded, including 7 trees protected by the TPO's, their removal is acceptable subject to replacement tree planting. It is noted that whilst there is a number of trees to be removed these specimens are either poor quality, dysfunctional and/or in decline. All other large mature trees, which are in good condition are to be retained and protected. Overall the landscaping approach is

considered acceptable with new tree replacement planting, indicatively shown on the submitted plans to be adjacent to the proposed frontage parking area, along the eastern boundary with Woodcote Drive (both circled in blue on figure 14) as well an opportunity to provide additional planning within the proposed communal area (circled in orange on figure 14).



*Figure 14: Indicative landscaping layout plan with proposed tree replacements.*

- 8.66. The site is not subject to any statutory or non-statutory designations in relation to ecology. The application was submitted with phase 1 assessment which set out that sites likely impact upon designated sites, protected and priority species. The initial survey recommended that a bat survey was undertaken and this was submitted accordingly to the LPA for review. This has been reviewed accordingly and considered to provide sufficient ecological information for determination, subject to relevant conditions being added to the proposal. Details shall be secured in regards to biodiversity layout plan, indicating where the proposed enhancement measures would be located as well as a wildlife sensitive lighting design scheme and for works to be undertaken in accordance with the submitted ecology assessments.
- 8.67. In summary, the proposal would include replacements to the removed trees on site and would incorporate mitigation measures to reduce or avoid the impact on protected habitats on site as per Local Plan Policies DM10.8, DM27 and DM28.

### **Sustainability and Flooding**

#### Sustainability and Energy Efficiency:

- 8.68. Policy SP6.2 of the CLP (2018) states that the Council will ensure that development make the fullest contribution to minimising carbon dioxide

emissions in accordance with the London Plan energy hierarchy to assist in meeting local, London Plan and national CO2 reduction targets. CLP policy SP6.3 requires all new developments to achieve a high standard of sustainable design and construction. All new dwellings in major development should be proposed to be zero carbon with a minimum a 35% reduction in regulated carbon emissions over the 2013 Building Regulations is required on site, with any remaining CO2 emissions to be offset through a financial contribution. The proposal has been submitted with an energy and sustainability assessment which sets out that the proposed buildings would create a site wider reduction of CO2 over part L 2013 Building Regulations of 35.4%.

- 8.69. Policy SP6.3 of the CLP (2018) requires all new-build residential development to meet water efficiency standard of 110 litres/person/day as set out in Building Regulations Part G. The decision notice would include a condition to ensure the development would adhere to the standards of this policy.

Flooding and Sustainable Urban Drainage:

- 8.70. The site falls within an area potentially at risk from groundwater flooding as well as low levels of risk of surface water flooding. The applicants have submitted a Flood Risk Assessment which was reviewed by the LLFA who have no objection to the scheme subject to planning conditions requiring the detailed strategy is submitted for review once infiltration testing has been completed on-site. This is proposed condition is recommended accordingly.

**Environmental Health**

- 8.71. Policy DM23 of the Croydon Local Plan (2018) states that the Council will promote high standards of development and construction throughout the borough by: a. Ensuring that future development, that may be liable to cause or be affected by pollution through air, noise, dust, or vibration, will not be detrimental to the health, safety and amenity of users of the site or surrounding land; and b. Ensuring that developments are air quality neutral and do not lead to further deterioration of existing poor air quality;

Air Pollution:

- 8.72. The proposal has been submitted with an air quality assessment which has considered the site, and proposed mitigations which are proposed to be secured via condition. Additionally, the s106 agreement would include air quality financial contribution of £100 per unit.

Noise Pollution:

- 8.73. A noise impact assessment has been submitted as part of the proposal. This sets out that any noise disturbance for future occupiers can be mitigated by robust glazing specifications. The findings of this study are accepted and proposed to be secured via condition accordingly.

Contaminated Land

- 8.74. A desktop study was submitted with the application which details the potential risk on-site from contamination. Whilst the results of this survey are noted, considering the scale of the development a full site investigation should be undertaken, assessed and approved by the LPA prior to the commencement of work on-site. This is proposed to be secured via conditions accordingly.

## **9. CONCLUSIONS**

- 9.1. The provision of 41 residential dwellings within the Borough is encouraged by the Council's Local Plan policies, national guidance in the NPPF and regional policies of the London Plan.
- 9.2. The proposal would provide 30% affordable housing, and is in line with the principles of Policy SP2.4 of the local plan.
- 9.3. The proposed site layout and design of the new building has been designed to respond to the character and context of the sites and its surroundings. In-line with the principles of the SDG, the proposal is considered to be a high quality, design led development which is an appropriate scale, mass and height for this site.
- 9.4. The proposed development would result in the creation of modern residential units ensuring good standard of accommodation for future occupiers. The development has been designed to ensure that the amenity of existing local residents would not be compromised.
- 9.5. In addition, the development would be acceptable on highways, environmental and sustainability grounds as well as in respect of the proposed planning obligations.
- 9.6. The proposal would comply with the Croydon Local Plan 2018 and would be acceptable. Taking all of the above planning considerations into account, it is recommended that planning permission should be granted.
- 9.7. All other relevant policies and considerations, including equalities, have been taken into account. Planning permission should be granted subject to a legal agreement for the reasons set out above. The details of the decision are set out in the RECOMMENDATION.