

**PART 6: Planning Applications for Decision**

**Item 6.4**

**1.0 SUMMARY OF APPLICATION DETAILS**

Ref: 20/01397/FUL  
 Location: 1-3 South Drive, Coulsdon, CR5 2BJ  
 Ward: Coulsdon Town  
 Description: Demolition of existing buildings, and erection of a part 5, part 6 storey (plus lower ground floor) block of flats and associated car parking, cycle parking, bin storage and landscaping.  
 Drawing Nos: MAC-SDC\_HTA-A\_DR\_1000 P1; MAC-SDC\_HTA-A\_DR\_1100 P1; MAC-SDC\_HTA-A\_DR\_1101 P1; MAC-SDC\_HTA-A\_DR\_2000 P5; MAC-SDC\_HTA-A\_DR\_2001 P4; MAC-SDC\_HTA-A\_DR\_2002 P3; MAC-SDC\_HTA-A\_DR\_2003 P3; MAC-SDC\_HTA-A\_DR\_2004 P2; MAC-SDC\_HTA-A\_DR\_2005 P3; MAC-SDC\_HTA-A\_DR\_2006; MAC-SDC\_HTA-A\_DR\_2100 P4; MAC-SDC\_HTA-A\_DR\_2101 P4; MAC-SDC\_HTA-A\_DR\_2102 P4; MAC-SDC\_HTA-A\_DR\_2103 P4; MAC-SDC\_HTA-A\_DR\_2104 P5; MAC-SDC\_HTA-A\_DR\_2105 P3; MAC-SDC\_HTA-A\_DR\_2200 P5; MAC-SDC\_HTA-A\_DR\_2201 P5; 521.01  
 Applicant: Macar Developments Ltd  
 Agent: N/A  
 Case Officer: Chris Stacey

	1B2P	2B3P	2B4P	3B4P	3B5P	3B6P	TOTAL
<b>EXISTING</b>	0	0	0	0	0	2	<b>2</b>
<b>PROPOSED (AFFORDABLE RENT)</b>	6	7	5	0	2	0	<b>20</b>
<b>PROPOSED (PRIVATE)</b>	5	8	3	1	1	1	<b>19</b>
<b>TOTAL</b>	<b>11</b>	<b>15</b>	<b>8</b>	<b>1</b>	<b>3</b>	<b>1</b>	<b>39</b>

<b>Car parking spaces</b>	<b>Cycle parking spaces</b>
16 (Inc. 3 blue badge)	62

1.1 This application is being reported to committee because objections above the threshold in the Committee Consideration Criteria have been received and because both a Ward Councillor for Coulsdon Town (Cllr Clancy) and the Coulsdon West Residents Association made representations in accordance with the Committee Considerations Criteria and requested Planning Committee consideration.

**2.0 RECOMMENDATION**

2.1 That the Planning Committee resolve to GRANT planning permission subject to:

- A. The prior completion of a legal agreement to secure the following planning obligations:
- a) Provision of 50% affordable housing (by habitable room) at London Affordable Rent;
  - b) Carbon offset payment of £72,903;
  - c) Sustainable transport contribution of £58,500 towards measures in the immediately surrounding area;
  - d) Air quality mitigation contribution of £3,900;
  - e) 3 years paid car club membership for all future occupiers of the development;
  - f) S.278 works on South Drive;
  - g) Residential travel plan;
  - h) Restriction on future occupiers from applying for parking permits should a CPZ be implemented in the area;
  - i) Local employment and training strategy (construction phase) including a financial contribution of £17,500;
  - j) Monitoring fees - Figure TBC;
  - k) Any other planning obligation(s) considered necessary by the Director of Planning and Strategic Transport.

2.2 That the Director of Planning and Strategic Transport has delegated authority to issue the planning permission and impose conditions and informatives to secure the following matters:

### **Conditions**

1. Time limit of 3 years
2. Implemented in accordance with approved drawings

#### Pre-Commencement Conditions:

3. Construction management plan
4. Sustainable drainage measures
5. Land contamination

#### Prior to Above Ground Works Conditions:

6. Biodiversity enhancement strategy
7. Materials and detailing
8. Secure by design
9. Landscaping (including maintenance, external lighting, child play space and boundary treatments)
10. Public art

#### Prior to Occupation Conditions:

11. Waste management plan
12. Energy strategy and carbon reduction (including details of PV panels)
13. Delivery and servicing plan
14. Parking management plan (including details of electric vehicle charging points)

### Compliance Conditions:

15. Ecological mitigation and enhancement measures
16. Cycle store and refuse store
17. Arboricultural measures
18. Accessible homes
19. In accordance with recommendations of air quality assessment
20. 110litre water usage
  
21. Any other planning condition(s) considered necessary by the Director of Planning and Strategic Transport

### **Informatives**

1. Community Infrastructure Levy
2. Subject to legal agreement
3. Code of practice for construction sites
4. Wildlife protection
5. Thames Water
6. Refuse collection arrangements
7. Any other informative(s) considered necessary by the Director of Planning and Strategic Transport

- 2.3 That the 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.

### **3.0 SUMMARY OF KEY REASONS FOR RECOMMENDATION**

- The principle of intensifying the residential use of the existing site to provide a greater quantum of homes than existing is acceptable.
- The proposed development would provide 50% affordable housing (all to be delivered as London Affordable Rented homes) thereby providing a significant increase in new affordable homes within an existing residential area.
- The design and appearance of the development is acceptable and would evolve the local character whilst using land efficiently. Planning conditions are recommended to ensure that the development would use high quality materials, detailing and landscaping.
- The living standards for future occupiers would be acceptable and Nationally Described Space Standard (NDSS) compliant, with acceptable light and outlook levels, private amenity space, communal amenity space and child play space.
- The living conditions of adjoining occupiers would be protected from undue harm subject to conditions.
- The level of parking and impact upon the local transport network is considered acceptable subject to conditions and planning obligations.
- The proposal's impact on trees and biodiversity is acceptable subject to conditions. Suitable sustainability measures have been included and the development would be zero carbon (partly achieved through planning obligations).
- The proposed flooding and sustainable drainage measures are acceptable subject to conditions.

## 4.0 SITE LOCATION AND PROPOSAL DETAILS

### Site and Surroundings



*Figure 1: Existing properties at 1-3 South Drive*

- 4.1 The application site measures 48m in width and 40m in depth, has an overall area of 0.16ha, and is currently occupied by two detached 3 bedroom bungalows with accommodation in the roof. The site slopes down towards the south and east and both existing bungalows are elevated above street level due to the slope of the land such that No.1 South Drive is lower than No.3 South Drive, and both bungalows appear to have higher ridge heights than the two storey houses opposite. The lowest part of the site is in the south-east corner, and land levels rise gradually across the site by approximately 7m leading to the highest part of the site in the north-west corner. Each existing property features a driveway with an associated dropped kerb leading to a detached garage block and a generous garden to the rear.



*Figure 2: Location of site*

- 4.2 The site sits on the west side of South Drive close to its junction with The Avenue. South Drive is a residential street just to the north-west of Coulsdon District Centre (the boundary of which is demarcated by the brown dashed line in Figure 2), and the site is surrounded by a mix of detached and semi-detached houses which are mostly 2 storey under pitched roofs. The buildings on the street mostly date from the first half of the 20<sup>th</sup> Century and are varied in design although there are shared design characteristics, including bay windows, tiled pitched roofs, brick, tile and render (pebbledash or painted) elevations, and gaps between buildings. Neighbouring buildings on the street are generally set behind steeply sloped landscaped gardens with low boundary walls and large trees which contributes towards a suburban character. The site does not fall within a conservation area, nor does it sit in close proximity to any statutory listed buildings. The site has a PTAL of 4 and sits in close proximity to a number of bus stops served by multiple routes (indicated by red dots in Figure 2), Coulsdon Town station (highlighted in Figure 2), the A23 road (indicated by a blue line in Figure 2) and a car club bay on Leaden Hill (indicated by a green dot in Figure 2).

### **Proposal**

- 4.3 The application seeks to demolish both of the existing detached bungalows and erect a part five, part six storey building (plus lower ground floor) accommodating thirty nine homes.



- The proposal would comprise of 11 x 1 bedroom, 23 x 2 bedroom and 5 x 3 bedroom apartments, of which 50% would be London Affordable Rented homes (delivered through a S.106 planning obligation).
- 16 parking spaces would be located within the basement and within the forecourt to the front of the site, accessed via a single relocated replacement crossover.
- A communal garden with child play space is proposed to the rear of the site.
- Both refuse storage and cycle storage is located within the building envelope at lower ground floor with direct access from both the front of the building and from within the internal circulation core.
- A comprehensive landscaping scheme including planting to the front boundary, replacement trees and biodiversity enhancement measures.



*Figure 3: View of front of proposal*

## **Planning History**

4.4 The following planning decisions are relevant to the application:

### 1 South Drive:

19/01109/FUL

Demolition of existing detached dwelling and detached garage and the erection of a three/four storey building with accommodation within the lower level and roof level to provide 9 flats (comprising 1 x 1 bedroom, 5 x two bedroom and 3 x three bedroom units), cycle storage, private and communal amenity space, landscaping including land level alterations, bin store, new access crossover and the provision of 6 parking spaces to the front.

***Permission granted July 2019, not yet implemented.***

13 South Drive:

18/05880/FUL Demolition of the existing property and erection of new apartment building containing nine self-contained apartments, car parking, refuse storage, cycle storage and associated landscaping.

***Permission granted April 2019, constructed.***

21/01094/CONR Variation of condition 10 car club of 18/05880/FUL.

***Currently under determination.***

## **5.0 CONSULTATION RESPONSE**

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

5.2 The following were consulted regarding the application:

### **Designing Out Crime Officer**

5.3 No objection subject to a condition requiring Secured by Design accreditation (which is recommended)

### **Ecology Advisor**

5.4 No objection subject to conditions securing biodiversity mitigation and enhancement measures (which are recommended)

### **Local Lead Flood Authority**

5.5 No objection subject to a pre-commencement condition (which is recommended)

### **London Fire Brigade**

5.6 No response received

### **Thames Water**

5.7 No objection subject to an informative in respect of discharging into a public sewer (which is recommended)

## **6.0 LOCAL REPRESENTATION**

6.1 A total of 34 neighbouring properties were notified about the application and invited to comment and the application was also advertised by site notice and in the local press. The number of representations received from neighbours, local groups etc. in response to notification and publicity of the application were as follows:

No of individual responses: 497    Objecting: 489    Supporting: 7

No of petitions received: 0

6.2 The following issues were raised in representations that are material to the determination of the application, and they are addressed in substance in the next section of this report:

SUMMARY OF OBJECTIONS	RESPONSE
Principle of development	
Overdevelopment / in excess of density range	Please refer to paragraph 8.9 of this report
Proposed housing will not be affordable	Please refer to paragraph 8.4 of this report
Loss of existing family homes	The proposed development would result in a net uplift in family accommodation
The proposed mix of housing is not policy compliant	Please refer to paragraph 8.8 of this report
This level of intensification is not justifiable following reduction in London Plan housing targets	Please refer to paragraph 8.2 of this report
The scale of development proposed is not justified outside of a 'Focussed Intensification Zone'	Given that the site sits close to the boundary of a district centre and has good access to public transport a scheme of the scale proposed is in principle considered justifiable
Design	
Adverse impact on character of area	Please refer to paragraphs 8.10 – 8.23 of this report
Height and massing is unacceptable	Please refer to paragraphs 8.14 – 8.18 of this report
Poor quality of proposed accommodation	Please refer to paragraphs 8.24 – 8.27 of this report
Insufficient amenity and child play space	The proposed child play space is in excess of the required standards
The architectural style of the proposal is not in keeping with the area	Please refer to paragraphs 8.19 – 8.23 of this report
Proposed flat roof is inappropriate in this location	Please refer to paragraph 8.20 of this report
Proposal should be considered as a 'tall and large building' as per policy DM15 of the Croydon Local Plan	Please refer to paragraph 8.15 of this report
Amenity	
Negative impact on neighbouring amenity	Please refer to paragraphs 8.28 – 8.34 of this report
Overlooking and loss of privacy	Please refer to paragraphs 8.28 – 8.34 of this report
Impacts on neighbouring daylight	Please refer to paragraphs 8.28 – 8.34 of this report
Increase in noise levels	The proposal is for a C3 (residential) use and would therefore not introduce noise levels which would be incompatible with other C3 (residential) uses
Disturbance from construction	A condition is recommended requiring the submission of a construction



	management plan prior to the commencement of works
<b>Highways &amp; Parking</b>	
Insufficient car parking	Please refer to paragraphs 8.38 – 8.41 of this report
Parking survey is inadequate	The submitted parking survey has been undertaken in accordance with the 'Lambeth Methodology'
Negative impact on highway safety	Please refer to paragraphs 8.36 – 8.37 of this report
Public transport network is at capacity and cannot accommodate additional residents	The proposed additional public transport trips generated by this development are not of such a level as to have a material impact on the overall capacity of the public transport network with any negligible additional impact being offset by the proposed sustainable transport contribution
<b>Other matters</b>	
Impact upon local infrastructure	The proposed development would be CIL liable which assists in delivering infrastructure in the Borough
Loss of natural vegetation and natural habitat	Please refer to paragraphs 8.45 – 8.48 of this report
Detrimental impact on trees	Please refer to paragraphs 8.45 – 8.46 of this report
Cumulative impact of development	The cumulative impact of this development and other developments consented within the immediate local area has been taken into consideration and is referred to where such impacts would be relevant within this report
Damage to neighbouring properties from construction works	This is a civil matter and is not a material planning consideration
Right of light infringements for neighbouring properties	This is a civil matter and is not a material planning consideration
Will increase flooding in the area	The proposed development would incorporate SUDS measures. Please refer to paragraph 8.50 of this report
The sewage system in this area cannot cope with the proposed development	This is a matter which needs to be dealt with between the applicant and Thames Water
Proposal will adversely impact upon a locally designated view from Farthing Downs	Given the location of this proposal and the presence of other developments of a similar or larger scale between this view point and the application site (i.e. Smitham Yard/Leaden Hill), the proposal will not adversely impact this view
Increase in carbon footprint / adverse environmental impacts	Please refer to paragraph 8.49 of this report

1 lift and staircase is not safe from a fire safety perspective	A fire statement has been submitted with the application to demonstrate the scheme is acceptable from a fire safety perspective. The planning system does not need to duplicate other statutory regimes
Inaccurate information submitted with the application	Sufficient information to allow for the determination of the application has been submitted
Flats are not suitable given the current COVID-19 pandemic	Flats form a substantial part of Croydon's existing stock and are essential to assist the borough in meeting housing need.
Covenants on these properties restrict the building of anything other than single dwellinghouses	This is a legal matter and is not a material planning consideration
Proposal will cause adverse health impacts	Please refer to paragraph 8.57 of this report
Detrimental impact on surrounding property values	Property values are not a material planning consideration
Conflict in interest between applicant and officers of the Council	There is no conflict of interest between any Council employees involved in this application and the developer. All relevant Declarations of Interest have been made
<b>SUMMARY OF SUPPORT</b>	<b>RESPONSE</b>
Good design and use of space	Noted

6.3 Councillor Clancy requested that the application be heard at planning committee and made the following representations:

- Overdevelopment
- Unacceptable design
- Height of proposal would be overbearing and create an unwelcome precedent in the area
- Would cause a loss of privacy and light to surrounding properties
- Would exacerbate parking stress on South Drive

6.4 Coulsdon West Residents Association requested that the application be heard at planning committee and made the following representations:

- Inaccurate documentation submitted
- Overdevelopment / excessive density
- Proposed height and massing would be overbearing
- Adverse impact on parking in local area and operation of the highway
- Adverse impact on biodiversity
- Inappropriate mix of units proposed
- Insufficient amenity space proposed
- Daylight levels for proposed flats does not meet BRE criteria
- Would create an unacceptable precedent for this area

6.5 East Coulsdon Residents Association made the following representations:

- Overdevelopment
- Proposed development is an incompatible use of this site
- Design is out of keeping with locality
- Topography of site will mean that its height will be exacerbated rising above the buildings on the High Street
- Adverse amenity impacts for adjoining properties
- Inadequate car parking
- Adverse impact on parking in local area and operation of the highway
- Construction vehicles would significantly disrupt the operation of the town centre
- Coulsdon does not need the further provision of 1 and 2 bedroom flats
- Insufficient private amenity space proposed

## 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.

### National Guidance

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:

- Delivering a sufficient supply of homes;
- Promoting healthy and safe communities;
- Promoting sustainable transport;
- Making effective use of land;
- Achieving well-designed places.

### Development Plan

7.3 The Development Plan comprises the Croydon Local Plan 2018 (**CLP**), the London Plan 2021 (**LP**), and the South London Waste Plan 2012 (**SLWP**).

7.4 Whilst generally only applicable to developments of 25 homes or less the Council's Suburban Design Guide 2019 (**SDG**) which is a supplementary planning document (SPD) intended to provide supplementary guidance to the CLP is also of relevance.

7.5 A full list of relevant policies are included in Appendix 1 of this report.

## 8.0 MATERIAL PLANNING CONSIDERATIONS

8.1 The main planning issues raised by the application that the committee must consider are:

1. Principle of Development
2. Housing Tenure, Mix and Density

3. Design and Appearance
4. Housing Quality
5. Impact on Surrounding Neighbours
6. Highways, Parking and Refuse
7. Trees, Landscaping, Biodiversity and Sustainability
8. Flood Risk and Sustainable Drainage
9. Other Matters

### **Principle of Development**

8.2 The site's existing use is residential and as such the proposed redevelopment of the site for residential purposes is acceptable. Policy SP2.2 of the CLP states that the Council will seek to deliver a minimum of 32,890 homes between 2016 and 2036, equating to 1,645 homes per year, with 10,060 of said homes being delivered across the borough on windfall sites (i.e. non allocated sites outside of the Croydon Opportunity Area – such as this application site), and equating to 503 homes per year. The LP sets a housing target for Croydon of 20,790 homes between 2019 and 2029, equating to 2,079 homes per year, which includes a “small sites” target of 6,410, equating to 641 homes per year, which is an increase on the Council's current windfall target. Given the above the principle of intensifying the residential use of the existing site to provide a greater quantum of homes than existing is acceptable.

### **Housing Tenure, Mix and Site Optimisation**

- 8.3 Policies SP2.4 and SP2.5 of the CLP state that on sites of ten or more dwellings the Council will seek a minimum of 30% affordable housing, but negotiate to achieve up to 50% affordable housing (subject to viability), and seek a 60:40 split between affordable rented homes and intermediate (including starter) homes.
- 8.4 The proposed scheme seeks to provide 20 affordable homes which represents 50% of the total housing proposed by habitable room at a split of 100% affordable rented. Given that the quantum of affordable housing proposed meets the requirements of SP2.4 of the CLP a viability appraisal has not been undertaken. The affordable rented provision is proposed in the form of London Affordable Rent units, a low cost rented product supported by the Mayor of London which is based on social rent levels which are considerably lower than typical affordable rent levels, which can be set at up to 80% of market rent levels, and represents a form of affordable housing that is genuinely affordable to people on low incomes.

	Market	Affordable <i>(London Affordable Rent)</i>
Units	19	20
<i>As a %</i>	49%	51%
Habitable Rooms	55	56
<i>As a %</i>	50%	50%

*Fig. 4 Proposed tenure split*

- 8.5 Whilst the proposed affordable housing tenure split differs from that set out in policy SP2.4 of the CLP, given that 100% of the proposed affordable housing would be provided as affordable rented (in the form of London Affordable Rent) which is both a more affordable product and for which Croydon has a greater need (91% of need for homes in Croydon is for affordable homes for residents on lower incomes), and which Moat (a Registered Provider) has requested on this site, the proposed tenure split is strongly supported and can be afforded substantial weight in the determination of this application given the benefits arising from this provision.
- 8.6 Officers understand, as set out in paragraph 4.3 above, that the site is to be sold to Moat who intend to deliver the whole scheme as affordable housing. The s106 agreement and planning permission would only secure the 50% of units as affordable housing (being the reasonable maximum in policy terms) and so no weight should be attached to the potential for the other 19 units potentially being delivered as affordable housing as this would not be controlled by the planning permission.
- 8.7 Both of the existing properties which are to be demolished are 3 bedroom properties measuring circa 140sqm and can be classified as family homes. Policy DM1.2 of the CLP seeks to prevent the loss of 3 bedroom homes (as originally built) and homes smaller than 130sqm, and whilst the proposal would result in the loss of 2 x 3 bedroom properties it would provide 5 x 3 bedroom properties and would thus result in a net uplift in family housing on the site and would thus not conflict with this policy.
- 8.8 As the site sits within an 'urban setting' (due to its close proximity to Coulsdon district centre, despite its built form being of a suburban character) with a PTAL of 4, in accordance with Table 4.1 of policy DM1.1 of the CLP, major proposals in this location are required to provide a minimum of 40% 3 bedroom homes unless there is an agreement with the associated affordable housing provider that 3 or more bedroom dwellings are neither viable nor needed as part of the affordable housing element of any proposal. In this instance Moat (a Registered Provider) has confirmed that the proposed mix (which only includes a 3 bedroom home provision of 12.8%) represents their identified need in this location for affordable housing provision. Given that it is understood that it is likely that 100% of these homes would become affordable in practice, such a mix can be supported in line with the exceptions to the preferred mix outlined by policy DM1.1 of the CLP which allows for an alternative mix where requested by a Registered Provider. Given the above the proposed mix can be supported.

	<b>Affordable</b>	<b>Market</b>	<b>Total</b>
<b>1b2p</b>	6	5	<b>11</b>
<i>As a %</i>	<i>30</i>	<i>26.3</i>	<i>28.2</i>
<b>2b3p</b>	7	8	<b>15</b>
<i>As a %</i>	<i>35</i>	<i>42.1</i>	<i>38.4</i>
<b>2b4p</b>	5	3	<b>8</b>
<i>As a %</i>	<i>25</i>	<i>15.8</i>	<i>20.5</i>
<b>3b4p</b>	0	1	<b>1</b>



As a %	0	5.3	2.6
<b>3b5p</b>	2	1	<b>3</b>
As a %	10	5.3	7.7
<b>3b6p</b>	0	1	<b>1</b>
As a %	0	5.3	2.6
<b>Total</b>	<b>20</b>	<b>19</b>	<b>39</b>

*Fig. 5 Proposed mix by tenure*

8.9 With respect to the optimisation of the site policy D3 of the LP sets out that all development must make the best use of land by following a design-led approach that optimises the capacity of sites. It is important to note that this policy does not set out numerical density ranges for different locations as per the old LP which no longer forms part of the development plan and as such is not a material planning consideration. Part B of this policy does however promote higher density developments in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling. Given the site has a PTAL of 4 and sits approximately 50m north-west of the boundary of Coulsdon District Centre which has extensive amenities and good public transport connections, in principle this site is considered appropriate for a development of higher density. Whilst the principle of a higher density development on this site can be considered acceptable it is recognised that this policy sets out a number of design considerations to be assessed in order to determine whether the form of development being proposed is appropriate in this instance and such considerations are detailed in the subsequent section of this report.

## **Design and Appearance**

### Layout

8.10 The proposed layout of the development includes the provision of a single kinked flatted block which follows the front building lines of the existing bungalows. A small amount of car parking is provided to the front of the site adjacent to the main pedestrian access route alongside a large area of soft landscaping. A communal garden and child play area is located to the rear of the building. With the exception of visitor cycle parking, all other cycle parking and refuse storage is located within the footprint of the building at lower ground floor.



Figure 6: Proposed site plan

8.11 Given that the proposed front building line would follow that of both the existing bungalows and would align with the neighbouring property at 5 South Drive, the proposal would be compliant with the guidance regarding building lines set out in section 2.17 of the SDG. In respect of the rear building line whilst it is noted that this does notably extend beyond the rear building line of 5 South Drive, given the separation distance between the building and 5 South Drive (6.8m), along with the incorporation of partially recessed corners, said building line would not breach a 45 degree line from the nearest window of this property when taken in plan (as advised by section 2.11 of the SDG) and would not extend beyond the existing rear building line of this property to an extent that would upset the development pattern. Given that the properties fronting The Avenue are separated from the proposed development by a distance of 23m and sit at 90 degrees to the proposed development the proposed rear building in relation to these properties is not considered to have an adverse impact upon the development pattern. A gap of 1.7m and 1.3m between each side of the building and the respective boundaries (excluding the proposed oriel windows to each side elevation) to 5 South Drive and 2 and 2b The Avenue has been proposed according with the guidance regarding relationships to neighbouring boundaries contained in section 2.16 of the SDG. As the proposal spans two plots, guidance contained within section 2.15 of the SDG requires proposals to respond to the gap in built form that historically existed across the boundary. In this instance the proposal successfully achieves this through the incorporation of a 2.5m wide, 2m deep recess in the centre of the building and a step in the height of the building at this point which assists in both breaking down the overall mass of the proposals whilst also allowing the proposal to reflect the plot widths and pattern of development along South Drive.

Given the adherence to the above guidance the siting and layout of the proposed development would accord with policy DM10.1a of the CLP which requires proposals to respect the development pattern, layout and siting of the surrounding area.

- 8.12 The proposed land levels largely follow the existing topography of the site and that of the neighbouring sites sloping upwards from both the south and east sides of the site, with the highest part of the site being at its north-west corner. The proposed development seeks to work with said land levels to avoid significant areas of excavation and this arrangement allows for both step free access to the main entrance of the building using a shallow gradient ramp (accompanied by a stepped route) and the communal garden and child play area to the rear whilst negating the requirement for large retaining walls which would adversely impact upon the streetscene.
- 8.13 The front of the site is effectively split in two by the communal entrance to the building which sits in the centre of the site. The southern half of the site frontage accommodates the vehicular access ramp to the lower ground car parking area (accessed via a replacement crossover) as well as 3 car parking spaces at surface, visitor cycle parking and access to the refuse store which also sits at lower ground level within the building envelope. The northern half of the site frontage features an area of soft landscaping, incorporating grass, trees and shrubs which will help to soften the overall appearance of the frontage of the site as well as a ramped pedestrian access route to the communal entrance to the building. Direct access from the building to the communal garden and child play area to the rear is provided via a centrally located corridor leading out to a step free pathway at the rear of the building. The arrangement of the aforementioned spaces will ensure that the curtilage of the site accommodates an appropriate proportion of soft landscaping that is in keeping with the suburban character of South Drive.

#### Scale, Height and Massing

- 8.14 Policy DM10.1b of the CLP requires proposals to respect the scale, height and massing of the surrounding area, whilst seeking to achieve a minimum height of 3 storeys. Whilst principally intended for developments proposing 25 homes or less Section 2.10 of the SDG promotes development of greater heights than that of neighbouring properties citing that building height changes regularly occur on streets across the borough and as such developments do not necessarily need to step down in height towards neighbouring buildings of a lesser height.
- 8.15 Policy DM15 of the CLP sets out criteria for how to assess 'tall and large' buildings and also details when proposals should be considered as such, defining them in paragraph 6.152 as those which are significantly taller and larger than surrounding buildings and those which would cause a significant change to the skyline. Whilst it is recognised that the proposal would rise to 6 storeys in height on a street where the predominant height is 2 storeys (with paragraph 6.153 suggesting that in such situations a proposal would be considered to be a 'tall' building), given that only part of the building would be 6 storeys in height (the part which is furthest away from adjacent properties), and the manner in which the proposal both steps down and back to better respond to the scale of neighbouring properties, it is considered that the proposal has suitably sought to address its relationship with its surroundings such that it doesn't represent such a stark differential in scale to neighbouring properties nor would cause a significant change to the skyline which would otherwise render it being considered a 'tall and large' building in line with policy DM15 of the CLP. Whilst the proposal is not in a location identified for such buildings in place specific policy DM37 of the CLP, had the



proposal had been assessed under policy DM15 of the CLP it should be recognised that it would accord with the criteria set out in that it is located in an area with a PTAL of 4 with direct links to the Croydon Opportunity Area, the design is of exceptional quality and that the proposal does not adversely impact on any heritage assets.



*Figure 7: View looking down South Drive*



*Figure 8: View looking up South Drive*

8.16 The proposed building would be a part 5, part 6 storey building with 4 storey wings on both its north and south facades. Notwithstanding the conclusion reached in paragraph 8.15 above it is recognised that the proposed overall scale, height and massing of the



proposed development would be larger than that of the existing buildings on South Drive, however given the size of the site, its separation to neighbouring properties and its location just 50m from the boundary of Coulsdon district centre, a proposal of this scale which seeks to evolve the character of the street through a larger and denser development is considered appropriate in this instance. Moreover it should also be recognised that within the adjacent district centre building heights rise up to 7 storeys in height (and are visible from the application site), and as such a building of this scale on the periphery of a district centre is not in principle considered to be out of keeping with the wider townscape of this area to a degree that would render it out of keeping with the surrounding area. In order to achieve an acceptable relationship to the immediate neighbouring properties, which generally feature 2 storeys plus a pitched roof, a series of steps to the building's overall height, mass and form have been incorporated to break up the building's overall scale. The northern half of the building is 5 storeys in height, stepping down to 4 storeys directly adjacent to 5 South Drive. Given however the manner in which the development utilises the existing land levels on the site, the ground floor level would effectively sit below that of 5 South Drive, and as such the overall height of the building adjacent to this boundary would be approximately half a storey taller than that of the ridge height of 5 South Drive. Given the fact that the 4 storey element of the proposal would also be set in from both the front and rear facades to accentuate the subservience of this element of the building, the relationship between the proposed development and 5 South Drive in respect of the building's scale, height and massing (as illustrated by Figure 8) is considered acceptable. In respect of the relationship between the proposal and the properties at 2 and 2b The Avenue, it should be recognised that the distance between the rear elevation of these properties and the proposed building is 23m, with the rear gardens of said properties benefitting from the presence of a number of large mature trees. Whilst the difference between the height of the proposed southern portion of the building (being 6 storeys in height, stepping down to 4 storeys) and these properties coupled with the land levels change is significant, given the aforementioned relationship between the proposal and these buildings, along with the two storey set down and set ins from both the front and rear facades on the southern end of the building, this proposed relationship in townscape terms is considered acceptable.





*Figure 9: Relationship between proposed development and 5 South Drive*

- 8.17 Existing properties on the opposite side of South Drive (No's 8-14) are also 2 storey dwellings with pitched roofs and due to land level changes sit at a lower level than both the application site and the street. Whilst the differential between the proposed height of the development and these properties is not insubstantial (albeit in part mitigated through the various stepping features of the building), given the front to front distance between the proposal and these properties, which measures a total of 26m (inclusive of the front gardens of said properties and the landscaped area to the front of the application site), along with the presence of soft landscaping features, said relationship is not considered harmful to the extent that it would have an adverse impact upon the character of the area.
- 8.18 Whilst the proposed development seeks to provide a building of a greater scale to that of the immediately surrounding existing properties (albeit not out of keeping with the scale of other developments in the local area), such an increase in scale in a highly accessible location on the periphery of a district centre is supported by policies set out both within the CLP, LP and SDG which seek to evolve the character of such sustainable locations to assist in the delivery of increased levels of housing and as such on balance the proposed scale, height and massing of the development is considered to strike an appropriate relationship between optimising the development potential of the site whilst not unacceptably impacting the character of the surrounding area.

Appearance and Materials

- 8.19 The proposed architectural approach for the development seeks to deliver a contemporary interpretation of a traditional residential 'mansion block', a form of development commonly found in both suburban and urban settings. In order to inform the appearance of the proposed development a robust character analysis of the local area has been undertaken and the proposal seeks to reference aspects of the surrounding character, such as the material choice and proportions of the fenestration, whilst at the same time introducing aspects of contemporary detailing to ensure that the proposal is not simply a pastiche of surrounding buildings. Such an approach to the appearance of the proposed development is considered appropriate in this instance and is considered to result in a high quality development which would complement and successfully evolve and enhance the character of the surrounding area.



*Figure 10: Main entrance to building*

- 8.20 Whilst the proposed roof form of the building would be flat, in this instance said roof form is a key feature of the overall contemporary aesthetic of the building and is integral to what officers consider to be a convincing design approach, with the top of the building being celebrated and articulated by vertical brick corbelling. Section 2.19 of the SDG outlines that the proportions of the roof, comparative to the rest of the proposal, should be well considered, which may mean that in certain circumstances a pitched roof may not be appropriate, and in this instance had a pitched roof been incorporated officers are of the opinion that this would have introduced an unnecessarily bulky feature which would have overcomplicated and detracted from the scheme's overall appearance.
- 8.21 The proposed material palette is simple yet effective and incorporates a red multi stock brick as the principle facing material, interspersed with GRC banding along with aluminium openings treated in a dark grey/bronze tone. Careful consideration has been given to the detailing of the building, with key features including a vertically stacked horizontal brick banding between levels, vertical brick corbelling to the upper levels, and an ornate, yet contemporarily detailed, communal entrance. Overall the proposed material palette and detailing is well considered and would result in a high quality building which would complement the surrounding character and would accord with both relevant guidance contained within the SDG and relevant policy contained within the CLP. A condition requiring the submission of samples and the specification of the final materials, alongside detailed drawings of reveal depths and key junctions/features (such as the brickwork features) has been recommended. A condition requiring the submission of details of the proposed hardscaping materials alongside soft landscaping features, including the maintenance of such details, would be imposed as well as a condition requiring the submission of details for any external lighting.



*Figure 11: Detailing to the top of the building*

- 8.22 In order to respect the character of the street and the locality, balconies have been inset and incorporated holistically into the design of building as opposed to being projecting features which can appear stuck on and would be out of keeping in a suburban location such as this. Such an approach follows the guidance set out in section 2.26 of the SDG.

Conclusion:

- 8.23 In conclusion whilst it is recognised that the scale and massing of the proposal would be greater than that of other buildings on the street, the manner in which the proposal seeks to respond to the local character through respecting the development pattern (through building lines and respecting the existing plot rhythm), stepping down and back in height and scale adjacent to neighbouring properties, and utilising a material palette and detailing which picks up on materials commonly found within the local area, is considered to allow the proposal to evolve the character of the street through the intensification of this site in a suitable manner which respects and enhances its character.

**Housing Quality**

- 8.24 As outlined by Figure 12 below almost all of the proposed units would meet or exceed the internal floor area and private amenity space standards set out by both the Nationally Described Space Standards (NDSS) and Table 6.2 in the CLP. 1 x 3b6p home would have a private amenity space 2.9sqm under the standard, although given this unit is on the top floor and is dual aspect on balance it is considered that this would still offer a good standard of accommodation. Furthermore 2 x 2b4p homes would also be marginally under the private amenity space standards (by 0.5sqm), however would be internally oversized to compensate for this – as such they would provide an appropriate level of residential amenity for their future occupiers.

	Internal Floor Area		Private Amenity Space	
	Requirement	Proposed	Requirement	Proposed
<b>FLATS 1, 3, 7, 12, 14, 15, 22, 23, 30, 33 &amp; 34</b> (1B2P)	50sqm	50-68.2sqm	5sqm	5.3-17.2sqm
<b>FLATS 2, 8, 9, 13, 16, 17, 19, 21, 24, 25, 27, 29, 32, 35 &amp; 39</b> (2B3P)	61sqm	62.4-68.9sqm	6sqm	6.1-19.6sqm
<b>FLATS 4, 10, 11, 18, 20, 26, 28 &amp; 38</b> (2B4P)	70sqm	70.2-86sqm	7sqm	6.5-25sqm
<b>FLAT 5</b> (3B4P)	74sqm	104.1sqm	7sqm	22.7sqm
<b>FLATS 6, 31 &amp; 36</b> (3B5P)	86sqm	89.9-103.6sqm	8sqm	13.5-15.9sqm
<b>FLAT 37</b> (3B6P)	95sqm	95.1sqm	9sqm	6.1sqm

Figure 12: Internal floor area and private amenity space

- 8.25 Due to privacy and overlooking concerns the majority of the proposed units would be single aspect, however careful consideration has been given to the internal layout of the proposed units in order to ensure that they are not deep in plan and feature generous frontages to enable them to be well lit and well ventilated. All of these units face either east or west and there are no single aspect north facing units proposed. An internal daylight and sunlight assessment accompanies the application and confirms that (bar two isolated instances to bedrooms) all of the habitable rooms proposed would meet or exceed the recommended average daylight factor (ADF) levels specified by BRE, with many of these rooms notably exceeding said recommended levels. Where units are located at ground floor level adjacent to communal areas suitable areas of defensible planting have been incorporated in order to ensure that the privacy of future occupiers is suitably protected.
- 8.26 Communal amenity space and child play space is located to the rear of the building and can be directly accessed from within the building via a centrally located corridor leading out to a footpath at the rear of the building in accordance with the guidance contained within the SDG. In line with Table 6.2 of the CLP the proposed development would be required to provide 167.5sqm of child play space, and the proposed development would provide an area for child play space of 169sqm which slightly exceeds this, alongside further areas of communal amenity space. A condition requiring the submission of further information and details in relation to the proposed communal amenity space and child play space is recommended.
- 8.27 In terms of accessibility, step free access would be provided from street to the front door through the use of suitably graded ramps externally, supplemented by a stepped route. At the rear of the building step free access would also be used to ensure that the child play area and communal garden are accessible to all residents of the



development. Within the building all of the proposed units and all other ancillary features (such as cycle parking, refuse store etc.) would benefit from level access due to the inclusion of a lift, with four of the ground floor units designed to be wheelchair adaptable/accessible (in accordance with Part M4(3) of the Building Regulations) and all other units designed to be adaptable/accessible (in accordance with Part M4(2) of the Building Regulations). Such provision would accord with the LP and would be secured via condition. To serve said wheelchair adaptable/accessible units proposed, three blue badge car parking spaces with the necessary clear zones around them have been proposed both to the front of the site and within the basement car park, and the applicant has also demonstrated that should a fourth be required this could be provided at the front of the site.

### Impact on Surrounding Neighbours

8.28 There are a number of properties that surround the site which include 5 South Drive to the north, 2, 2b and 4 The Avenue to the south, 8-14 South Drive to the east and 2-8a The Grove to the west as illustrated in Figure 13 below.



Figure 13: Surrounding neighbours

#### 5 South Drive

8.29 5 South Drive sits to the north of the application site at a higher level, with the main property sitting between 4.2m and 5.8m from the site boundary, between which sits a detached garage and an access path to the rear garden. This property features its main entrance to the side elevation fronting the application site along with three further windows at ground floor and two further windows at first floor on this side elevation. The front of the property features two bay windows, each featuring casements which front towards the application site and there are a number of windows serving the rear elevation of this property. All of the aforementioned windows have been tested as part



of a daylight and sunlight assessment submitted with the application. In respect of the side elevation it is noted that one of the ground floor side windows sits directly adjacent to the entrance door (and can thus reasonably be assumed to serve a hallway), and the two first floor side windows are obscure glazed (and can thus reasonably be assumed not to serve habitable rooms). Of the side facing windows all of these would experience breaches beyond BRE guidelines in respect of daylight, however all of these windows would continue to achieve sunlight levels in excess of those recommended by BRE guidelines, and given the nature of the spaces many of these windows serve, as well as their reliance on light from the application site, this level of impact is considered on balance to be acceptable. Of the side facing casements to the two front bay windows one would experience a breach beyond BRE guidelines in respect of daylight, however both would continue to achieve sunlight levels in excess of those recommended by BRE guidelines, and given said rooms are also served by additional multiple casements fronting away from the site the overall impact on these rooms would be negligible. Of the rear facing windows all of these windows would continue to achieve daylight and sunlight levels in accordance with BRE requirements. Overall the daylight and sunlight impacts upon 5 South Drive are considered to be minor and when weighed against the planning benefits arising from this scheme would not warrant the refusal of this application.

8.30 The front building line of the proposed development would align with that of 5 South Drive, with the rear building line exceeding that of 5 South Drive by 9m, however given the separation distance between the proposed building and that of 5 South Drive (6.8m), the proposal would not breach a 45 degree line (taken from the centre point of the closest habitable room window on the rear elevation of 5 South Drive outlined in Figure 14) in plan. Whilst it is recognised that a 45 degree line when taken in elevation from the same point is broken by the proposed development the extent of this, coupled with the separation distance between 5 South Drive and the proposed development is such that the proposal is not considered to be unacceptably overbearing. Moreover as explained in the previous paragraph it has been demonstrated that the proposal would not have an unacceptable daylight and sunlight impact upon 5 South Drive.

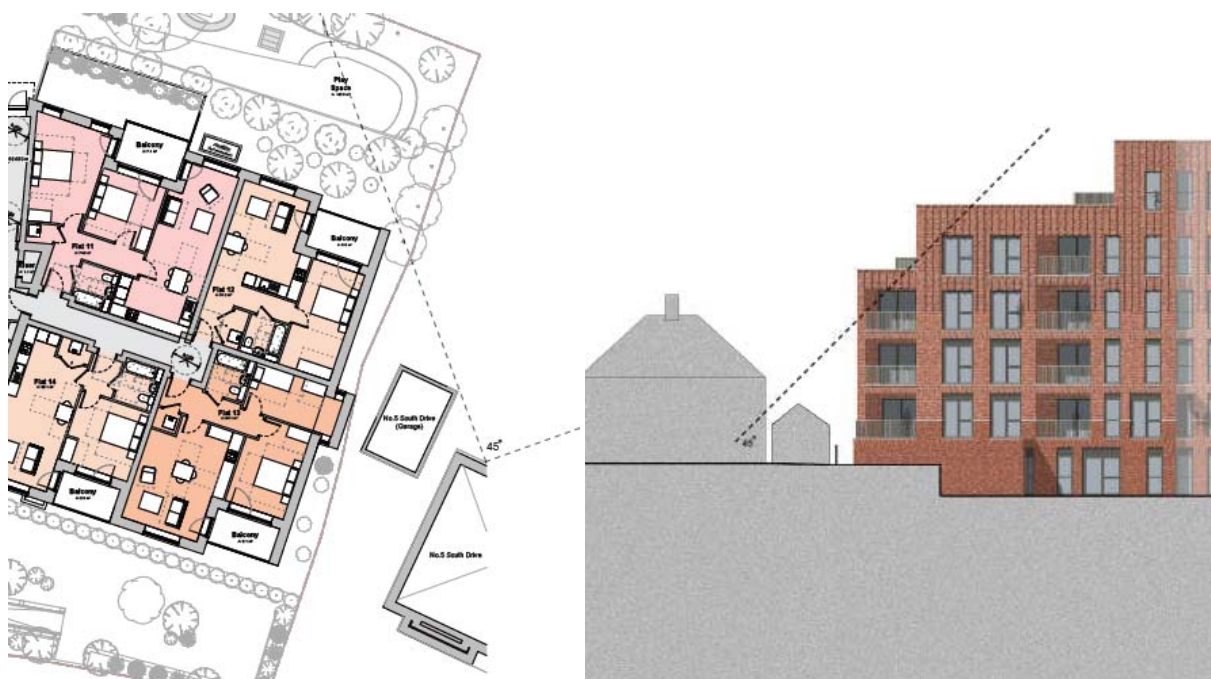


Figure 14: 45 degree line to 5 South Drive in plan and elevation

8.31 In order to avoid any direct overlooking of 5 South Drive and ensure that the first 10m of the rear garden are suitably protected (in accordance with DM10.6c of the CLP), with the exception of a window at ground floor level opposite the side elevation of 5 South Drive (which due to land level changes would effectively sit a level lower than 5 South Drive) the proposal does not seek to provide any side facing windows on its north elevation and balconies proposed on both the east and west elevations are contained within the building form (i.e. are inset). Where habitable rooms are proposed on the north elevation they are served by oriel windows directing their outlook to either the east or west (a method promoted in section 2.9 of the SDG) and at levels 4 and 5 are notably set back from the edge of the building to an extent which would mitigate direct overlooking of this property.

#### 8-14 South Drive

8.32 These properties are located opposite the site with the separation distance between these properties and the proposal being in excess of 25m and including the presence of a road and landscaping. It is however recognised that due to topographical changes these properties sit at a lower level to the application site. Whilst the above relationship would not give rise to adverse overlooking impacts or result in unacceptable impacts to the outlook of 8-14 South Drive, a daylight and sunlight assessment has been undertaken to ascertain the impact of the proposed development on these properties. Said assessment has however demonstrated that all of the affected windows to these properties would comply with BRE guidelines and only experience a negligible impact, and furthermore all of the windows tested would continue to receive daylight levels in excess of those recommended by the BRE guidelines. As such the amenity implications on these properties would be limited and not unacceptable to an extent that would warrant the refusal of this application.

#### 2, 2b and 4 The Avenue

8.33 These properties are located to the south of the site at a lower level with the separation distances between the rear elevations of these properties and the proposal being in excess of 23m and including the presence of a number of large mature trees in the rear garden of 2b The Avenue (some of which are evergreen). The proposal does not include any side facing windows on its south elevation at levels ground to 3, with side facing windows to levels 4 and 5 notably set back from the edge of the building to an extent which would mitigate direct overlooking of these properties. Where habitable rooms are proposed on the south elevation at levels ground to 3 they are served by oriel windows directing their outlook to either the east or west (a method promoted in section 2.9 of the SDG). Balconies proposed on both the east and west elevations are contained within the building form (i.e. are inset) to avoid direct overlooking towards these properties, and those proposed on the south elevation at level 4 are notably set back from the edge of the building. Given this relationship the proposed development would not give rise to adverse overlooking impacts to the houses themselves nor the first 10m of each property's rear garden (as per the guidance contained within section 2.9 of the Suburban Design Guide). Furthermore given the distance present between the proposal and these properties coupled with the fact that levels 4 and 5 are notably set back the proposed development would not unacceptably impact upon the outlook from the rear of these properties. Given that these properties sit due south of the application site a daylight and sunlight assessment of these properties is not necessary as the proposal would not adversely impact upon their daylight and sunlight levels.

## 2-8a The Grove

- 8.34 These properties are located to the west of the application site at its rear and sit at a higher level with the separation distance between these properties and the proposal being in excess of 30m and including the presence of a number of large mature trees within their rear gardens (some of which are evergreen). Given this relationship the proposed development would not unacceptably impact upon the amenity of these properties.

### **Highways, Parking and Refuse**

- 8.35 The site has a PTAL of 4 representing a good level of public transport accessibility, sits approximately 300m north-west of Coulsdon Town rail station, 50m north of the closest bus stop on The Avenue and 100m north-west of the closest bus stop on Brighton Road. A car club bay on Leaden Hill is also located 250m south-east of the application site. South Drive is a non-classified non through route two-way residential street, albeit made narrow due to the presence of parked cars on both sides of the street, and slopes downwards outside the application site towards its junction with The Avenue which connects onto both Brighton Road and Woodcote Grove Road. Whilst the site sits just outside of the 'Coulsdon Centre' Controlled Parking Zone (CPZ), South Drive is subject to some parking restrictions (in the form of single yellow lines) applicable during 11am and 12pm Monday to Friday.
- 8.36 Vehicle access to the site is currently via two driveways and associated dropped kerbs both on the south side of each respective existing property. The proposed development seeks to remove both of the existing vehicular accesses and provide a single crossover towards the southern side of the site which would result in the provision of an additional on-street parking space. Said crossover would be 5.5m in width and be positioned at a 90 degree angle to the public highway. The submitted drawings have suitably demonstrated that the appropriate visibility splays for both pedestrians and vehicles can be achieved. Works to stop up the existing crossovers and provide the new crossover along with upgrades to the section of pavement immediately outside the application site will be carried out under a S.278 agreement between the applicant and the Council and will be secured under the S.106 agreement. Vehicular tracking diagrams have been provided with the application and demonstrate that sufficient space to accommodate the necessary vehicular movements both within the forecourt at the front of the site and within the basement parking area has been provided. Furthermore the Council's highways officer has confirmed that the gradients of the proposed ramp within the front forecourt are compliant with relevant guidance.
- 8.37 In respect of trip generation the proposed development is expected to generate in the region of 208 trips per day, of which 33 would be vehicular trips (with the remainder taking place via other transport modes such as public transport, walking and cycling). Given the level of vehicular trip generation expected from the proposed development and taking into account other developments within the vicinity of this site, the level of vehicular trip generation from this proposal would not adversely impact the operation of South Drive nor the surrounding road network. In order to further mitigate and assist in reducing private car use from both this development and within the local area a Travel Plan will be secured as part of the S.106 agreement (promoting the use of sustainable transport modes for future residents) and a Sustainable Transport Contribution of £58,500 will also be secured through the S.106 agreement and be used towards the potential future implementation of a CPZ in this area along with future

expansion of car club bays in the local area. Furthermore the applicant has committed to paying for 3 years membership for all future residents to the existing car club facility on Leaden Hill (250m from the site) and a permit free restriction will also be applied to all future occupants of this development to restrict them from applying for parking permits should a CPZ be implemented in this area. Such measures are considered to reasonably mitigate against any increase in vehicle trip generation from the proposed development and potentially allow for a reduction in this figure in the future.

- 8.38 Table 10.3 of the LP sets out maximum car parking standards for residential developments. This states that both 1-2 bedroom and 3 bedroom + properties in Outer London PTAL's of 4 should provide up to 0.5-0.75 spaces per unit, however goes on to clarify that when considering development proposals that are higher density or in more accessible locations, the lower standard should be applied as a maximum. Given the location of this site in very close proximity to both bus and rail links as well as its location on the edge of a district centre it is thus considered appropriate to apply the lower standard as a maximum in this instance. As such in line with the LP the proposed development could therefore provide up to a maximum of 19 spaces (as opposed to a maximum of 29 spaces had the higher standard been applied). In this instance it also needs to be borne in mind that policy DM30 of the CLP accepts 2/3rds car parking provision for the affordable element of a development which would reduce the aforementioned figure to 16 spaces (which would have equated to 24 spaces had the higher standard been applied) given the quantum of affordable housing proposed to be secured through the S.106 agreement. It is important to note however that it is not necessarily desirable to provide car parking up to the maximum standards given the ambitions of both the LP and CLP to reduce reliance on car usage and promote/prioritise sustainable modes of transport.
- 8.39 The proposed development would provide a total of 16 spaces (including 3 blue badge spaces (with the potential to adapt a further space in the front forecourt at a later date to increase this to 4) and electric vehicle charging facilities) and based on the above paragraph and using the lower standard (0.5 spaces per unit) as a maximum (as recommended by the LP) the development should not result in any parking 'overspill'. It is however recognised that in the current absence of a CPZ it is prudent to also undertake a more robust 'worst case' assessment of any potential impacts of this development to ascertain whether had the higher standard (0.75 spaces per unit) been applied (and be borne out in reality) whether this would unacceptably impact parking stress levels in the local area. In this scenario the proposed development would result in a parking overspill of 8 vehicles, and parking stress surveys undertaken across two nights in accordance with the established Lambeth Methodology demonstrated that the existing overnight parking stress within 200m of the application site was 80% (equating to 21 unoccupied spaces) and 84% (equating to 26 unoccupied spaces) respectively. As such, and when also taking into account the potential overspill of other developments within this area (which combined are expected to result in an overspill of 4 vehicles if the higher maximum standard is applied to them) it is noted that there would in effect be capacity to accommodate this level of parking should it arise, although it is noted that parking stress would rise to 93% (equating to 9 unoccupied spaces) and 89% (equating to 14 unoccupied spaces) respectively. Whilst it is recognised that this would take parking stress levels over the 85% threshold (where parking levels are considered 'stressed'), such a level of parking would be beyond that accepted by policy (as outlined in paragraph 8.38) and there are a number of other factors (including mitigation measures proposed) as outlined in paragraph 8.41 which in reality would likely reduce the level of parking demand for this development.

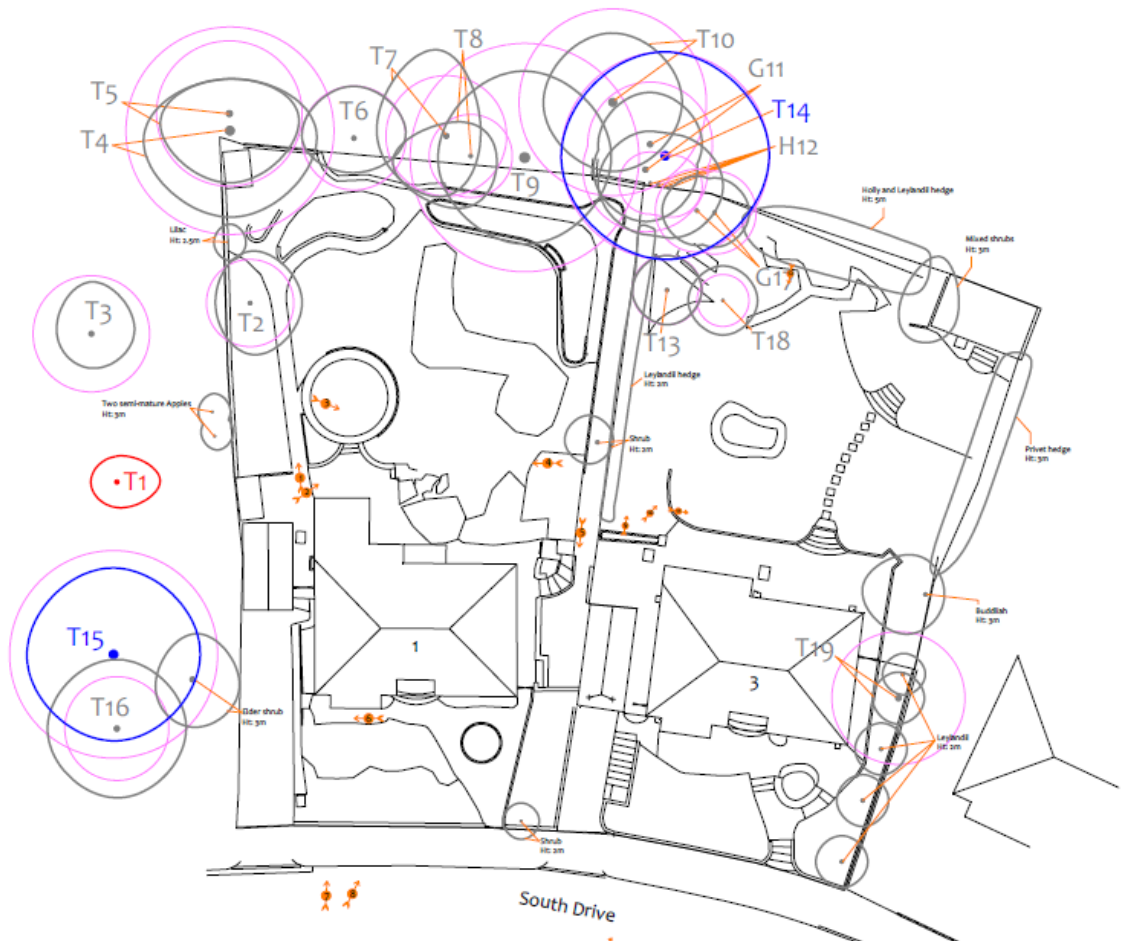
- 8.40 It is recognised that daytime parking levels (as evidenced by the parking stress survey) are higher than those at night time, however given the fact that the proposed development is for a residential use, where parking demand is generally lower during the daytime, it is not considered that the proposed development would further exacerbate daytime parking levels.
- 8.41 There are a number of factors and measures that form a part of the proposals which would in effect reduce parking demand and the potential implications for parking in the surrounding area. These include the fact that the development would remove one of the existing vehicular crossovers (resulting in a net increase of 1 on street parking space), will be subject to a residential travel plan (which will encourage more sustainable modes of transport and discourage private car use) and would also be providing all future occupants with 3 years membership to the nearby car club bay on Leaden Hill. Evidence from COMO UK suggests that one car club bay can replace the need for 10.5 vehicles, and when this, the potential impacts of a successful residential travel plan and the net increase in on street parking as a result of the development are taken into account, even in the 'worst case' scenario such measures would offset the anticipated parking overspill such that parking stress levels are not adversely impacted by the proposal. It also needs to be borne in mind that the area immediately around the application site is under consideration for future CPZ expansion, and the Sustainable Transport Contribution could be used towards funding this (and/or further car club bays which may further reduce private car reliance both for this site and in the local area). In the eventuality that a CPZ was implemented in this area, the permit free agreement being imposed by the S.106 would prevent any future occupiers from parking on the surrounding streets which would thus prevent the development from generating any parking 'overspill'. Given the above assessment and the various measures being proposed the development would thus not adversely impact parking stress in the local area.
- 8.42 In respect of cycle parking the proposed development provides a total of 62 cycle parking spaces in a secure store within the basement accessed from the front of the site and also accessible directly from the communal core of the building. Whilst the overall quantum of cycle parking would fall slightly short (by 10 spaces) of LP and CLP standards, in this instance whilst it had been demonstrated that a policy compliant level of cycle parking (72 spaces) could be accommodated in the proposed store, in order to encourage the uptake of cycling and make it as easy and accessible as possible for future occupiers, a reduced number of spaces is proposed to allow for 14 of these spaces to be in the form of Sheffield stands (as opposed to double stacking stands), which is considered to be more appropriate in this instance. In the event that the uptake of cycling increases to a point where double stacking stands are not seen as an obstacle to preventing people from cycling, it has been demonstrated that said Sheffield stands could be replaced by double stacking stands to bring the level of cycle parking up to the requisite levels. Given that this application will be subject to a Travel Plan which will require ongoing monitoring this situation can be controlled and adapted to suit future needs and as such is acceptable. 2 short stay cycle parking spaces in the form of Sheffield stands to the front of the site have been provided and this accords with both LP and CLP standards. A compliance condition securing the cycle store and its ongoing use as such is recommended.
- 8.43 With respect to refuse storage, a dedicated refuse store, including space for bulky goods, has been located at basement level within the envelope of the building and can

be directly accessed from the front of the building. Whilst the proposed store would be within 20m of the collection point on street, some of the bins at the rear of the store would be in excess of this and as such a waste management plan detailing how these bins will be presented within 20m of the collection point by the onsite management team is recommended to be secured via condition. Subject to this condition the proposed refuse provision would provide the requisite level of refuse storage for the proposed development and would accord with policy DM13 of the CLP.

8.44 It is anticipated that deliveries and servicing of the site would take place on-street, reflecting the existing arrangements and that of many proposals consented within the local area. In order to ensure that this is suitably managed in the future a delivery and servicing management plan is recommended via condition. In respect of construction management a full detailed Construction Logistics Plan would be required by planning condition to be submitted for the Council's approval prior to the commencement of development.

### Trees, Landscaping, Biodiversity and Sustainability

8.45 There are currently a total of 19 trees and hedges on or within the immediate vicinity of the site as identified by the tree survey schedule contained within the submitted Arboricultural Report. These include 2 Category B trees (1 sited within the rear garden of 2b The Avenue, and 1 sited within the rear garden of 6 The Grove), 16 Category C trees and hedges (11 of which are on adjacent sites, many of which in the rear gardens of properties on The Grove) and 1 Category U tree (situated within the rear garden of 2 The Avenue), and are highlighted in Figure 15 below. None of these trees are the subject of a Tree Preservation Order (TPO).



*Figure 15: Existing tree survey*

- 8.46 The proposed development seeks to remove 9 of the existing trees, all of which are Category C trees and are relatively small and/or are hidden from public view, as well as a Holly, *Leylandii* hedge and several small shrubs. Given the low quality and limited visual amenity value that these specimens hold, their removal is acceptable. In order to mitigate for the loss of the aforementioned trees and enhance the landscaping quality of the site, the proposal incorporates the planting of 18 new trees, including 10 at the front of the site (which is welcomed as it would assist in softening the appearance of the site's frontage and reflect some of the front gardens present along the street) as well as a number of smaller trees and shrubs across the entirety of the site (with further details of said planting to be secured via condition). Given the presence of a number of trees of good quality both on and directly adjacent to the site which are proposed to be retained, tree protection measures and restricted activity zones have been proposed. Subject to the imposition of suitably worded conditions, including a requirement that the proposed development accords with the recommendations contained within the submitted Arboricultural Report the Council's Arboricultural officer has no objections to the proposed development and the proposal would comply with policy DM28 of the CLP.
- 8.47 In respect of landscaping, an indicative landscaping plan has been provided which outlines that the site will feature a well balanced mix of both soft and hard landscaping, both at the front and rear of the site. The proposed soft landscaping will feature a mix of new trees, shrubs, hedging, grass and wildflower whereas the hard landscaping will feature a mix of permeable paving and areas of gravel. In line with policy G5 of the LP, major developments are required to include urban greening measures and in the absence of a local target at present a target score of 0.4 for residential developments is recommended. The applicant has submitted an urban greening factor assessment which outlines that the proposed development achieves a score of 0.32. Whilst said score falls below the recommended target set out in policy G5 of the LP, there are a number of factors on this site, including its overall size, requirement to provide a significant level of child play space to the rear (a feature which scores low in urban greening factor terms), and the inability to provide a green roof due to ongoing maintenance costs which would make the service costs unaffordable for the affordable housing units. Given the above, in this instance the level of urban greening proposed can on balance be considered acceptable given the relative constraints and as such the proposed indicative landscaping scheme for the site is acceptable and further details of the proposed landscaping (including samples where appropriate) alongside details of maintenance measures and any external lighting and boundary treatments proposed will be secured via condition.
- 8.48 An ecology report, incorporating a bat scoping survey, has been submitted in support of the application to identify what habitats are present on site and look for any evidence of, or potential for, protected/notable species. This report concluded that whilst the site contained some common/widespread habitat types, including the potential to support nesting birds, the proposed development would, subject to appropriate mitigation measures, not adversely impact upon any protected and priority species and habitats. Such mitigation measures include the provision of new bird nesting boxes and wildlife rich planting and will ensure that the proposed development results in a biodiversity net gain in accordance with policy G6 of the LP and policy DM27 of the CLP. Conditions securing the proposed ecological enhancements as detailed in the submitted ecology



report as well as requiring the submission of further details of biodiversity enhancement measures are recommended.

8.49 CLP policy SP6.2 requires new development to minimise carbon dioxide emissions, including requiring new dwellings in major development proposals to be zero carbon. As 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. CLP policy SP6.3 requires all new developments to achieve a high standard of sustainable design and construction. An energy statement accompanies the application and demonstrates how the proposals would achieve at least a 35% reduction in regulated carbon emissions. The building fabric would use good levels of insulation, low air permeability, high efficiency heating systems and advanced heating controls, along with the use of solar PV panels in order to achieve this. Given that said solar PV panels are not indicated on the proposed plans (albeit there is a sufficiently sized flat portion of roof which would allow them to discreetly sited) details of said panels would be required by condition to ensure that they both achieve the anticipated emissions savings whilst also not having any adverse impact upon the final appearance of the proposed building. The remaining regulated CO2 emissions shortfall (in order to achieve the equivalent of zero carbon) would be secured through the S.106 agreement by way of a carbon offset payment of £72,903.

### **Flood Risk and Sustainable Drainage**

8.50 The applicant has submitted a Flood Risk Assessment which also includes details of proposed SUDS measures. The site is located in Flood Zone 1 and according to the Environment Agency has a very low probability of fluvial flooding. Furthermore the site also sits in a location which is at a very low risk of surface water flooding. In order to mitigate against any possible increase in surface water flooding within the local area SUDS measures utilising infiltration systems with soakaway units and permeable paving will be incorporated in accordance with policy DM25 of the CLP with such measures being secured via a pre-commencement condition.

### **Other Matters**

8.51 The development will be liable for a Community Infrastructure Levy (CIL) payment. CIL payments are pooled from developments and contribute to delivering infrastructure to support the development of the Borough, such as local schools.

8.52 The proposal was considered by the Metropolitan Police Service's Designing out Crime Officer who raised no objections. In order to ensure a safe, inclusive and accessible development where crime and disorder and the fear of crime do not undermine the quality of life, Secured by Design accreditation is recommended to be secured by a planning conditions.

8.53 CLP policy DM14 requires the inclusion of public art, which is to be secured by a planning condition.

8.54 In accordance with policy D12 of the LP the applicant has provided a fire statement and fire strategy undertaken by an independent suitably qualified assessor showing the fire resistance credentials of the building to minimise the risk of fire spread, the location of a fire appliance, means of escape and the evacuation assembly point. This matter will be finalised through the Building Regulations regime.

- 8.55 The site is in residential use and the land is unlikely to be contaminated. A stage 1 contamination report and intrusive investigation is however recommended by condition, along with remedial works in the event that contamination is found to be present during the construction phase, to ensure a safe environment for future residents.
- 8.56 The site is in an Air Quality Management Area (AQMA), although it is not on a main road or near particularly polluting uses. A contribution of £3,900 towards air quality improvements to mitigate against non-road transport emissions will be secured via a S.106 agreement.
- 8.57 A health impact assessment screening was submitted which identified that the proposal would improve housing quality, with suitable access to health, social and retail facilities, open space and would be environmentally sustainable.

### **Conclusion**

- 8.58 All other relevant policies and considerations, including equalities, have been taken into account. Planning permission should be granted subject to conditions and a legal agreement for the reasons set out above. The details of the decision are set in the RECOMMENDATION section of this report.

## **Appendix 1: Planning Policies and Guidance**

The following lists set out the most relevant policies and guidance, although they are not exhaustive and the provisions of the whole Development Plan apply (in addition to further material considerations).

### CLP

The Croydon Local Plan was adopted in February 2018 and the most relevant policies to this application are as follows:

- SP2 Homes
- DM1 Housing Choice for Sustainable Communities
- SP4 Urban Design and Local Character
- DM10 Design and Character
- DM13 Refuse and Recycling
- DM14 Public Art
- DM16 Promoting Healthy Communities
- SP6 Environment and Climate Change
- DM23 Development and Construction
- DM24 Land Contamination
- DM25 Sustainable Drainage Systems and Reducing Flood Risk
- SP7 Green Grid
- DM27 Protecting and Enhancing our Biodiversity
- DM28 Trees
- SP8 Transport and Communication
- DM29 Promoting Sustainable Travel and Reducing Congestion
- DM30 Car and Cycle Parking in New Development
- DM37 Coulsdon

The Suburban Design Guide was adopted in April 2019 as a supplementary planning document to the CLP and is of relevance.

### LP

The London Plan was adopted in March 2021 and the most relevant policies to this application are as follows:

- Policy GG1 Building Strong and Inclusive Communities
- Policy GG2 Making the Best Use of Land
- Policy GG3 Creating a Healthy City
- Policy GG4 Delivering the Homes Londoners Need
- Policy D1 London's Form, Character and Capacity for Growth
- Policy D2 Infrastructure Requirements for Sustainable Densities
- Policy D3 Optimising Site Capacity Through the Design-Led Approach
- Policy D4 Delivering Good Design
- Policy D5 Inclusive Design
- Policy D6 Housing Quality and Standards
- Policy D7 Accessible Housing
- Policy D8 Public Realm
- Policy D11 Safety, Security and Resilience to Emergency

- Policy D12 Fire Safety
- Policy H1 Increasing Housing Supply
- Policy H2 Small Sites
- Policy H4 Delivering Affordable Housing
- Policy H5 Threshold Approach to Applications
- Policy H6 Affordable Housing Tenure
- Policy H10 Housing Size Mix
- Policy S4 Play and Informal Recreation
- Policy G1 Green Infrastructure
- Policy G5 Urban Greening
- Policy G6 Biodiversity and Access to Nature
- Policy G7 Trees and Woodlands
- Policy SI 1 Improving Air Quality
- Policy SI 2 Minimising Greenhouse Gas Emissions
- Policy SI 3 Energy Infrastructure
- Policy SI 4 Managing Heat Risk
- Policy SI 5 Water Infrastructure
- Policy SI 7 Reducing Waste and Supporting the Circular Economy
- Policy SI 12 Flood Risk Management
- Policy SI 13 Sustainable Drainage
- Policy T1 Strategic Approach to Transport
- Policy T2 Healthy Streets
- Policy T3 Transport Capacity, Connectivity and Safeguarding
- Policy T4 Assessing and Mitigating Transport Impacts
- Policy T5 Cycling
- Policy T6 Car Parking
- Policy T6.1 Residential Parking
- Policy T7 Deliveries, Servicing and Construction
- Policy T9 Funding Transport Infrastructure Through Planning

The Housing SPG was adopted in March 2016 and the Play and Informal Recreation SPG was adopted in September 2012, both as supplementary planning guidance to the LP and are of relevance.