

1.0 APPLICATION DETAILS

Ref: 21/02020/FUL
Location: 86 Bradmore Way | Coulsdon | CR5 1PB
Ward: Old Coulsdon
Description: Demolition of existing dwelling and garage and erection of a 2-3 storey building (including lower ground floor), comprising 7 dwellings, together with car parking, cycle parking, refuse storage and associated landscaping.
Drawings: 20.043.001; 20.043.002; 20.043.003; 20.043.101F Rev. F; 20.043.102M Rev. M; 20.043.103; 10.043.110A Rev. A; 20.043.111; 20.043.112; 20.043.113; 20.043.120; 20.043.121; 20.043.122; 20.043.123; 20.043.124; 20.043.125; 20.043.126B; 20.043.127B; 20.043.130; 20.043.132; 2020/5527/002 Rev. P5; 2020/5527/003 Rev. P5; 2101/06/AIA Rev. A; Amended Landscaping Plan (Received 14.01.2022); CGI Rendering Looking Northwest toward Site; and CGI Rendering Looking Southeast toward Site.
Statements: Arboricultural Impact Assessment (ref. 2101/06/AIA) -- Prepared by Oakwood Tree Consultants Ltd (15.10.2021); Covering Letter -- Prepared by HTA Design (16.04.2021); Design and Access Statement Rev. A -- Prepared by Harp & Harp (Received 18.01.2022); Energy Statement for Planning (ref. 8540 Rev. 2) -- Prepared by Base Energy (21.04.2021); External Daylight Study (ref. 8540 Rev. A) -- Prepared by Base Energy (21.04.2021); Flood Risk and Surface Water Assessment -- Prepared by Base Energy (20.04.2021); Planning Statement -- Prepared by HTA Design (April 2021); Planning Statement Addendum 1: Fire Safety (ref. NPA-BWC-86-IHTA-P-Planning Statement-Addendum-211121 TC) -- Prepared by HTA Design (November 2021); and Transport Statement (ref. 5527/TS01) -- Prepared by RGP (April 2021).
Agent: Arjun Singh
Applicant: New Place Associates
Case Officer: Demetri Prevatt

	Type of Dwelling Units					Totals
	One Bedroom	Two Bedroom	Three Bedroom	Four Bedroom	Five or More Bedrooms	
Existing	0	0	1	0	0	1
Proposed	0	2	3	2	0	7

Number of Vehicle Parking Spaces	Number of Cycle Parking Spaces
Five (5)	Sixteen (16)

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; and
- Referral from Ward Cllr. Margaret Bird supported by Ward Cllr. Steve Hollands.

2.0 RECOMMENDATION

2.1 That the Planning Committee resolve to GRANT planning permission subject to the completion of a legal agreement to secure the following:

- A financial contribution of £10,500 for sustainable transport improvements and enhancements.

2.2 That the Director of Planning and Sustainable Regeneration has delegated authority to negotiate the legal agreement indicated above.

2.3 That the Director of Planning and Sustainable Regeneration has delegated authority to issue the planning permission and impose conditions and informatives to secure the following matters:

CONDITIONS

Standard

1. Three-year time limit for commencement.
2. Requirement for development to be carried out in accordance with the approved drawings and reports.

Pre-Commencement of Development Conditions

3. Submission and approval of a Construction Management Plan and Construction Logistics Plan.
4. Submission and approval of a Construction Environmental Management Plan for Biodiversity.
5. Submission and approval of details of a Tree Method Statement and Tree Protection Plan.
6. Submission and approval of details of a Protected and Priority Species Site Survey and, if necessary, Impact Management Plan.

Pre-Commencement of Above Ground Work Conditions

7. Submission and approval of details of a Sustainable Urban Drainage System.
8. Submission of detailed drawings of the retaining walls.

Pre-Commencement of Visible Superstructure Conditions

9. Submission and approval of details of the materials specifications including facing materials, joinery and openings.
10. Submission and approval of details of Enhanced Sound Insulation.
11. Submission and approval of details of the rooftop photovoltaic panel installation.

Pre-Occupation Conditions

12. Submission and approval of details of on Electric Vehicle Charging Points.
13. Submission and approval of details of a Waste Management Plan.
14. Submission and approval of further details on the Landscaping Strategy including a Biodiversity Enhancement Strategy, landscaping management plan, and details on: boundary treatment design (incl. visibility splays); arrangement of communal amenity space; play space arrangement equipment, and materials/plantings for hard/soft landscaping.
15. Submission and approval of details on lighting.

Compliance Conditions

16. Use restriction to dwellinghouses (Use Class C3).
17. Implementation of cycle storage as shown on plans prior to occupation.
18. Provision and maintenance of off-street vehicle parking spaces.
19. Provision of accessible and adaptable dwellings.
20. Compliance with dwelling emissions rate and water efficiency standard.
21. Installation and maintenance of anti-vibration measures.
22. Compliance with noise emissions levels of mechanical equipment.
23. Provision of ultra-low NOx boilers.
24. Any other planning condition(s) considered necessary by the Director of Planning and Strategic Transport

INFORMATIVES

1. Community Infrastructure Levy
2. Code of practice for Construction Sites
3. Highways informative in relation to s278 and s38 works required
4. Compliance with Building/Fire Regulations
5. Construction Logistics Informative
6. Refuse and cycle storage Informative
7. Any other informative(s) considered necessary by the Director of Planning and Strategic Transport

3.0 PROPOSAL AND LOCATION DETAILS



Proposal

3.1 The application seeks Planning Permission for the redevelopment of the site involving the:

- Demolition of the existing two-storey detached dwellinghouse (Use Class C3);
- Erection of a two/three-storey detached building with a habitable loft level to provide seven (7) self-contained dwelling units (Use Class C3);
- Provision of five (5) vehicle parking spaces on a raised platform;
- Provision of associated amenity, cycle storage, hard/soft landscaped, and waste storage spaces; and
- Various supporting alterations.

3.2 According to the proposed plans listed above, the building proposed would rise above its 324.6sqm lower ground level floor plate to peaks and ridgelines located between 8.6m to 12.3m above the lowest adjacent ground level. It would have a design inspired by the Arts & Craft architecture and styling of neighbouring buildings and be finished in a red hue. The predominant finishing material of mixed red stock brick would be complemented by red creasing tiles, red framing, and rosemary red clay roofing tiles. These red elements would be contrasted by

a mix of light green framing and timber joist, as well as, lead dormers at roof level. Visual relief would be provided via the aforementioned creased tile and contrasting elements, as well as, bay windows, clipped eaves, diaper pattern brickwork, and gable-end projections.

- 3.3 The proposed building would provide a three-bedroom, five-person dwellinghouse spread across the lower and upper ground floor levels (Unit 5), and two (2) four-bedroom, eight-person dwellinghouses spread across all three (3) levels (Units 1 & 2). Additionally, two (2) three-bedroom, five-person flats would be spread across the lower and upper ground floor levels (Units 3 & 4) while two (2) two-bedroom, three-person flats would be located in the loft level (Units 6 & 7). The gross internal area (GIA) of each flat is detailed in Table 3.0.

Dwelling	Floorspace Provided	Floorspace Required	Number of Bedrooms	Type of Bedrooms	Occupancy
Unit 1	144.5sqm	124.0sqm	4	4 Doubles	8
Unit 2	136.2sqm	124.0sqm	4	4 Doubles	8
Unit 3	112.1sqm	93.0sqm	3	2 Doubles & 1 Single	5
Unit 4	131.2sqm	93.0sqm	3	2 Doubles & 1 Single	5
Unit 5	93.4sqm	93.0sqm	3	2 Doubles & 1 Single	5
Unit 6	61.2sqm	61.0sqm	2	1 Double & 1 Single	3
Unit 7	69.2sqm	61.0sqm	2	1 Double & 1 Single	3

Table 3.0: Details of dwellings to be provided.

- 3.4 At the front of the property, a ramp from street level would provide access across the forecourt to stairs to the lower ground floor level, as well as, a private front entrance to Unit 3 and communal entrance to Units 4, 6, and 7. The stairs to the lower ground floor level would lead to the private entrances to Units 1, 2 and 5. The forecourt would be the location for five (5) off-street vehicle parking spaces (including one (1) disabled parking space), as well as, communal cycle and waste stores.
- 3.5 The private amenity space provided by the balcony or patio from which every unit would benefit would be supplemented by 362.1sqm of amenity space to be provided in the re-landscaped rear garden. A section of the rear garden has been identified as the location for the requisite 38.8sqm of children's play space.
- 3.6 According to the Arboricultural Impact Assessment (dwg. 2106/06/AIA) and Arboricultural Impact Assessment Plan (dwg. 2101/06/AIA), the proposal would involve minor pruning to a single tree (T2) located in the front garden of the host property, as well as, the felling of a group of trees (G13) in the side garden and three (3) trees (T7, T10 and T12) in the rear garden. The proposed loss of trees would be off-set by the planting of two (2) feature trees in the front garden and three (3) in the rear garden.
- 3.7 The proposed alterations would involve a reconfiguration of the existing vehicle crossover to the front of the property, formation of a second crossover, and

raising the height of the front garden to form a forecourt through the installation of raised platform (i.e. rootbridge system).

Site and Surroundings



- 3.8 The application site is an essentially rectangular 1,425.3sqm residential property located in Coulsdon on the southwest side of Bradmore Way. It is a double-wide property that contains a two-storey detached dwellinghouse that sits notably below street level due to the front garden's steep slope down from the pavement. While the design of the dwellinghouse adopted some elements of the characteristic Arts and Craft styled houses that line Bradmore Way, it is a unique yet fitting element along the street scene.
- 3.9 Steep gradients and mature trees are defining elements of the character and appearance of the local suburban setting with the host property being no exception. Bradmore Way slopes upward in a west to east direction while the properties have dramatic changes in height and fall away from north to south. Dense groups of plantings and trees in the rear gardens provide a green frame to the picturesque views of Farthing Downs to the south.
- 3.10 The existing dwellinghouse is accessible via steps carved into the slope of the front garden. These steps also provide access to a path along the side of the building that leads to the rear garden. A vehicle ramp that has also been built into the slope of the front garden provides access to a detached garage.

- 3.11 Although the application site is within walking distance of Coulsdon South national rail station, it has a 'poor' PTAL Rating of 1B. Vehicular access is relatively convenient due to the aforementioned detached front garage and lack of local parking restrictions, such as a Controlled Parking Zone, along the immediate stretch of Bradmore Way.
- 3.12 In regard to other relevant planning constraints, the local area is deemed to be a Critical Drainage Area. However, the host property is neither located within a Conservation Area, subject to a relevant Article 4 Direction, nor the site of a Listed Building.

Planning History

- 3.13 19/02891/FUL -- Enlargement of the existing single dwelling house and creation of a pair of semi-detached dwellings with vehicle access, cycle and refuse storage, retaining walls and raised patio area. -- Conditionally Granted on 24.03.2020.
- 3.14 18/02380/FUL -- Demolition of existing garage and the erection of a three/four bedroom two storey dwelling with accommodation at lower ground floor, associated parking and amenity provision. -- Conditionally granted on 06.09.2018.
- 3.15 18/01623/HSE -- Alterations and part demolition of the existing property; the erection of a two storey front/side/rear extension; and the provision of a rear balcony and raised patio area. -- Conditionally granted on 01.06.2018.
- 3.16 Advice given on pre-application enquires ref. 17/06335/PRE, 19/01574/PRE, 19/03672/PRE, 20/00276/PRE, and 20/03986/PRE.

4.0 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The principle of the intensified residential development is acceptable given the residential character of the surrounding area and the need for housing nationally and locally.
- The proposal includes a mix of different sized units and provides a good quality of accommodation and amenity space for residents.
- The design and appearance of the development is of a high quality and is sympathetic to the character of the surrounding area.
- The proposed landscaping scheme and planting of additional trees would result in an enhancement to the streetscene.
- The living conditions of adjoining occupiers would be protected from undue harm.
- The level of parking and the impact on highway safety and efficiency would be acceptable.

5.0 CONSULTATIONS

- 5.1 None.

6.0 LOCAL REPRESENTATION

- 6.1 Ten (10) neighbouring properties were notified of the application and invited to comment. Four-hundred and fifty-three (453) representations were received with four-hundred and fifty-one (451) constituting objections to the proposal. Individuals/groups such as MP Chris Philip, the East Coulsdon Residents' Association, London Wildlife Trust, and Old Coulsdon Residents' Association were noted as objectors. The concerns raised in the objections received are summarised in Table 6.0, which also contains the Case Officer's response to the objections.

Objection	Officer's Response
Principle of Development	
As local housing targets are being met and there is a local oversaturation of flats, such a development is unnecessary. The area needs more family homes. Furthermore, the London Plan (2021) reduced its housing target prior to its adoption.	Acknowledged and addressed in paragraphs 8.2 through 8.6. Furthermore, a reduction in housing targets does not constitute their elimination and the housing targets in the London Plan are higher than those set out in the Croydon Local Plan 2018
The scale of the development is inappropriate for the locality and such developments should be concentrated around transport hubs.	Acknowledged and addressed in paragraphs 8.2 through 8.6.
The local area is not designated an area of focused intensification.	It is acknowledged that the application site does not fall within an area of focused intensification. However, the proposed development is not seeking to benefit from the provisions of the Croydon Local Plan's focused intensification policy (DM10.11).
Density	
The increase in the number of dwellings constitutes an overdevelopment that would strain soft and hard infrastructure.	Acknowledged and addressed in paragraphs 8.8 through 8.10.
The cumulative impacts of allowing intensification proposals on the application and in the local area would be excessive and unsustainable.	The carrying capacity of the application site and surrounding area is acknowledged and addressed in paragraphs 8.8 through 8.10. Similar assessments for intensification proposals in the local area would be completed prior to Planning Permission being granted. As such, cumulative impacts within the entire area would be taken into consideration.
Impact on Character & Appearance	
As there are currently no blocks of flats along Bradmore Way, the	Acknowledged and addressed in paragraphs 8.11 and 8.16.

proposal's introduction of flats would be out of keeping with the character of the single-family area.	
The appearance of the development (e.g. materials, height and style) would be incongruous with the appearances of neighbouring buildings that define the character of the street scene.	Acknowledged and addressed in paragraphs 8.15 through 8.20.
The height of the proposed building is not considerate of the local topography and would result in losses of views through and beyond the application site.	Acknowledged and addressed in paragraph 8.20.
The excessive bulk, footprint, height, massing and size of the proposed building would be out of keeping with the quiet, leafy street and semi-rural street/area comprised of detached and semi-detached properties.	Acknowledged and addressed in paragraphs 8.20 through 8.24.
Balconies and roof terraces are out of keeping with the character of the rear garden setting.	Acknowledged and addressed in paragraph 8.19.
The existing dwellinghouse is of architectural/historical merit and warrants preservation.	As the existing building is neither a locally or statutory Listed Building, it is not especially protected from demolition. The merits of replacing the dwellinghouse are acknowledged and addressed in paragraphs 8.11 through 8.24.
Impact on Local Amenity	
The increase in the number of units and inhabitants would result in an increase in activity and noise that would constitute an undue nuisance.	Acknowledged and addressed in paragraph 8.29.
The design and scale of the proposed building would appear overbearing and result in undue losses of light, outlook, and privacy.	Acknowledged and addressed in paragraphs 8.25 through 8.28.
The construction of the proposed development would generate dust, noise and pollution.	The ability to construct permitted development is granted by right through planning legislation. However, building works to complete such development must take place in accordance with the Council's requirements for construction that have been designed to fairly manage noise and disturbance during building works. In addition, a condition

	has been proposed requiring a Construction Management Plan and Construction Logistics Plan to manage these impacts.
The increase in density and introduction of flats proposed would result in an increase in crime.	While there may be a correlation between density and crime in some instances, there is no causality. Nevertheless, the design of the proposed development includes sufficient consideration of Crime Prevention through Environmental Design to ensure the safety and privacy of the host property and neighbouring properties.
Quality of Accommodation	
The dwellings proposed would provide insufficient space including areas to accommodate working/studying from home.	Addressed in paragraph 8.30. However, it is noted that as the relevant space standards do not explicitly address home office space, its provision does not constitute a material planning consideration.
The level of daylight and sunlight would be substandard in one (1) or more of the proposed flats.	Addressed in paragraph 8.31.
Living in flats can be detrimental to the mental health of occupants.	Addressed in paragraphs 8.30 through 8.33.
Impact on Local Transport	
The increase in the number of units and inhabitants would result in an unmanageable and unsustainable increase in traffic and on-street parking strain. Additionally, it would be detrimental to pedestrian/highway safety.	Addressed in paragraphs 8.44 through 8.54.
The use of sustainable modes of transport by future occupants would be limited by the challenging local topography.	Acknowledged and addressed in paragraphs 8.44 through 8.54.
The proposed development would adversely impact the highway safety of the nearby educational institution.	There is no empirical evidence to support this prediction.
Impact on Natural Environment	
The loss of natural habitats, permeable surface area, trees and vegetation would be detrimental to nature and ecology.	Acknowledged and addressed in paragraphs 8.38 and 8.43.
As the Applicant provided insufficient ecological evaluation of the existing site including	Addressed in paragraphs 8.38 and 8.39.

appropriate references to potential presence (temporary or permanent) of badgers, bats, and slow-worms habitats, they need to provide a protected and priority species survey of the site, construction environmental management plan (CEMP), and ecologically-sensitive lighting plan.	
The applicant should also adopt a landscaping plan that utilises planting that, as best as possible, reflects ecological character of the area (e.g. the downland flora of nearby Farthing Downs).	Acknowledged and addressed in paragraphs 8.38 and 8.41.
Archaeology	
The application site could be a significant site for archaeological remains.	The application site is not located within an Archaeological Priority Area and no evidence is available to the contrary.
Inaccuracies with Application	
Submissions included with the application provided inaccurate information about local properties including references to consented local developments that are not relevant to the proposal.	Any inaccuracies contained with the documents and drawings submitted with the application were minor in nature and insufficient to prejudice any assessment of the proposed development
The submissions (incl. drawings) provided with the application were insufficiently detailed.	The documents and drawings submitted with the application provide enough details to assist with a thorough and robust assessment of the proposed development.
The Transport Statement submitted with the application did not identify all local parking restrictions. Additionally, the parking survey detailed was not completed during school times.	The submitted statement contained enough relevant details during the relevant periods to assist with an accurate assessment of the on-street parking situation relevant to the proposed development.
Public Consultation	
The Site Notices found on the Public Access Module did not provide a deadline for responses.	Site Notices were not used for the subject application. The Notification Letters sent and details on the Council's website displayed the deadline for responses.
There was a lack of public engagement by the Applicant.	While encouraged to work with neighbours and stakeholders, Applicants are not obligated to do so.
Non-Material Considerations	
Properties along Bradmore Way are usually subject to covenants prohibiting flat conversions.	As legal covenants are a matter of property law and have no impact on the acceptability of the proposed

	development in planning terms as set out in the relevant planning legislation, they are not a material consideration for this application.
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Table 6.0: Issues material to the determination of the application raised in public objections.

6.2 Two (2) of objections received were from local Ward Councillors Margaret Bird and Steve Hollands who used their representations to refer the application to the Planning Committee. In addition to referring the application, they also objected on the grounds that the proposal would:

- Be an overdevelopment of the host property that would appear overbearing and out of keeping with the street scene;
- Be intrusive for neighbouring properties and block views of Farthing Downs that contribute to local character;
- Provide an insufficient amount of off-street vehicle parking spaces and electric vehicle charging points;
- Provide insufficient amenity space for future occupants due to the inaccessibility of the communal garden; and
- Have an unaccounted impact on local ecology.

6.3 The concerns of the local Ward Councillors are acknowledged and addressed in the assessment below.

7.0 RELEVANT PLANNING POLICIES AND GUIDANCE

7.1 This recommendation to grant planning permission has been taken having regard to the policies and proposals in the London Plan (2021) and Croydon Local Plan (2018), as well as, to all relevant material considerations:

Town and Country Planning Act 1990 (As Amended)

National Planning Policy Framework (2021)

Section 4	Decision Making
Section 5	Delivering a Sufficient Supply of Homes
Section 8	Promoting Healthy and Safe Communities
Section 9	Promoting Sustainable Transport
Section 11	Making Effective Use of Land
Section 12	Achieving Well-Designed Places
Section 14	Meeting the Challenge of Climate Change, Flooding and Coastal Change
Section 15	Conserving and Enhancing the Natural Environment

London Plan (2021)

Policy GG2	Making the Best Use of Land
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 D8	Public Realm
Policy D11	Safety, Security and Resilience to Emergency
Policy D12	Fire Safety
Policy D14	Noise
Policy H1	Increasing Housing Supply
Policy H2	Small Sites
Policy G4	Open Space
Policy G5	Urban Greening
Policy G6	Biodiversity and Access to Nature
Policy G7	Trees and Woodlands
Policy SI1	Improving Air Quality
Policy SI2	Minimising Greenhouse Gas Emissions
Policy SI4	Managing Heat Risk
Policy SI7	Reducing Waste and Supporting the Circular Economy
Policy SI12	Flood Risk Management
Policy SI14	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 T7	Deliveries, Servicing and Construction
Policy DF1	Delivery of the Plan and Planning Obligations

Croydon Local Plan (2018)

Policy DM1	Housing Choice for Sustainable Communities
Policy DM10	Design and Character
Policy DM13	Refuse and Recycling
Policy DM16	Promoting Healthy Communities
Policy DM18	Heritage Assets and Conservation
Policy DM25	Sustainable Drainage Systems and Reducing Flood Risk
Policy DM27	Protecting and Enhancing Our Biodiversity
Policy DM28	Trees
Policy DM29	Promoting Sustainable Travel and Reducing Congestion
Policy DM37	Coulsdon
Policy SP2	Homes
Policy SP4	Urban Design and Local Character
Policy SP6	Environment and Climate Change
Policy SP7	Green Grid
Policy SP8	Transport and Communication

Other Relevant Policies & Guidance

- Borough Character Appraisal (LBC - 2015)
- Housing SPG (GLA - 2015)
- Suburban Design Guide SPD (LBC - 2019)
- Technical Housing Standards - Nationally Described Space Standard (2015)

8.0 MATERIAL PLANNING CONSIDERATIONS

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

- Principle of Development;
- Density;
- Architectural and Environmental Design;
- Local Amenity;
- Quality of Accommodation;
- Amenity Space;
- Urban Greening;
- Local Transport;
- Environmental Sustainability;
- Waste Management; and
- Fire Safety.

Principle of Development

8.2 In order to create a housing market that works better for all Londoners, the London Plan (2021) states that the planning and development system must ensure that more homes are delivered (Policy GG4). This strategic objective is supported by the Croydon Local Plan (2018), which applies a presumption in favour of development of new homes and states that the Council will seek to deliver 32,890 homes between 2016 and 2036 with 10,060 of said homes being delivered across the borough on windfall sites (Croydon Local Plan -- Policy SP2). On these windfall sites, the London Plan (2021) encourages incremental densification that, through an appropriate design-led approach, helps make the best use of land and optimises the capacity of existing sites (Policy D3). Furthermore, the London Plan (2021) also states that London Boroughs should pro-actively support well-designed new homes on small sites (below 0.25 hectares in size) through planning decisions in order to significantly increase the contribution of small sites to both meeting London's housing needs and diversify the sources, locations, type and mix of housing supply (Policy H2).

8.3 As the application site's existing use is residential, the basic principle of optimising this residential use to increase the local stock of well-designed homes is acceptable.

8.4 In regard to "well-designed new homes", the London Plan (2021) and Croydon Local Plan (2018) note that development seeking to optimise local housing output is expected to have a high-quality design that addresses and respects the character of the local area; local need for family-sized housing; capacity of the local transport network; and the level of density the surrounding area is considered capable of supporting (London Plan - Policies D1, D2, D3 and GG2;

Croydon Local Plan - Policy DM1, DM10, SP2 and SP4).The proposed development would be a relatively low-impact addition to and diversification of an existing development leading to the provision of additional homes in a part of the Borough that is conveniently located close to an existing and well-served rail station. It is a good example of a sympathetically designed development that would increase the housing stock and options available to Londoners in an area where it is appropriate and could be handled.

8.5 According to the Croydon Local Plan (2018), there is an identified need for larger homes in the borough requiring the retention of existing three-bedroom dwelling units and the development of more (Paragraphs 4.20 and 4.21). Therefore, the Croydon Local Plan (2018) has set a strategic target for thirty percent (30%) of all new homes over the plan period to have three (3) or more bedrooms to help meet the borough’s need for family sized units and ensure that a choice of homes is available in the borough (Policies DM1.1 and SP2.7). In order to meet this strategic target, small scale suburban intensification schemes are generally expected to ensure that thirty-percent (30%) of the unit they provide have three (3) or more bedrooms. Additionally, the Council will only permit the redevelopment of residential units where it does not result in the net loss of three-bedroom homes (as originally built) or the loss of homes smaller than 130.0sqm (Croydon Local Plan -- Policy DM1).

8.6 It is acknowledged that the proposed development would result in the loss of a family-sized home (i.e. three (3) or more bedrooms). However, the existing dwellinghouse is larger than 130.0sqm and the proposal would result in the net gain of four (4) family-sized homes. Furthermore, the proposed development would exceed the strategic target for providing family-sized homes by having over seventy percent (70%) of the proposed homes providing three (3) or more bedrooms.

Type of Unit		Quantum
Two Bedroom	Two-Bedroom, Three-Person	2
Three-Bedroom (Family-Sized)	Three-Bedroom, Five-Person	3
Four-Bedroom (Family-Sized)	Four-Bedroom, Eight-Person	2

Table 8.0: Breakdown of the proposed dwellings by unit type.

- 8.7 Subject to compliance with the relevant policies and objectives of the National Planning Policy Framework (2021), London Plan (2021), Croydon Local Plan (2018), Croydon's Suburban Design Guide SPD (2019) (herein referred to as 'SDG') and all other relevant Supplementary Planning Guidance/ Documents, the proposal is considered to be in line with local and regional strategic objectives that seek to make the best use of land and optimise local housing potential.

Density

- 8.8 The London Plan (2021) requires development to follow a design-led approach that optimises the capacity of sites to ensure that development is of the most appropriate form and land use for the development site, as well as, responds to development sites' context and capacity for growth (Policy D3). In regard to the latter, the plan notes that the density of a development proposal should be linked to the provision of future planned levels of infrastructure rather than existing levels and be proportionate to the site's connectivity and accessibility by walking, cycling, and public transport to jobs and services (London Plan - Policy D2).
- 8.9 The proposed development would utilise three (3) levels to increase the density of the site but still present itself as a two-storey building from the street. Furthermore, it would increase the footprint of the property's main building without: adopting a shape that would be contrived or incongruous with the local built environment; or relying on excessive projections beyond the established building lines. Therefore, the proposal is considered to have adopted a considerate design-led approach that increases the density of the existing residential use on a spacious property through an acceptable built form.
- 8.10 In regard to infrastructure in the local area, the development would be required to contribute to the provision of local infrastructure via charges under the Mayoral and Croydon Community Infrastructure Levies (CIL). Additionally, the development would be required to make a contribution toward the provision of sustainable transport in the local area through a payment required by the Section 106 Legal Agreement that would need to be completed before the Planning Permission hereby recommended can be granted. These contributions are considered to be proportionate to the scale of the proposed development and sufficient to mitigate its expected impact on local infrastructure.

Architectural and Environmental Design

- 8.11 According to the National Planning Policy Framework (NPPF) (2021), the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve (Paragraph 126). Therefore, the NPPF (2021) requires planning policies and decisions to ensure developments are visually attractive as a result of good architecture, layout and appropriate and effective landscaping yet are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (e.g. increased densities) (Paragraph 130).
- 8.12 In accordance with NPPF (2021) policy on 'achieving well-designed places', Croydon's Local Plan (2018) requires development proposals to be of high

quality and respect: the development pattern, layout and siting; scale, height, massing, and density; and appearance, existing materials and built/natural features of the surrounding area and Place of Croydon in which it is located (Policy DM10).

- 8.13 With regard to the local character of the application site and its surroundings, both Croydon's Borough Character Appraisal (2015) and Local Plan (2018) identify Coulsdon as a small suburban settlement surrounded by green areas of Green Belt (Character Appraisal - Page 26; Local Plan - Paragraph 11.70). Furthermore, the Borough Character Appraisal (2015) notes that Coulsdon is relatively verdant in character with tree lined streets and its detached houses are mainly found on larger hillside properties with landscaped front and rear gardens (Pages 30 & 31).

Typology and Siting

- 8.14 It is noted that although the proposed building would provide residential accommodation and supporting amenities (e.g. cycle and waste storage spaces) across three (3) levels, the building would present itself externally as a pair of two-storey semi-detached houses with notably-sized side extensions. Additionally, the new structure would be built on the same site as the existing dwellinghouse. As a result, the property would reflect the form and siting that is characteristic of semi-detached dwellinghouse properties in the local area

Character and Materials

- 8.15 The SDG (2019) explicitly states that the built character of an area is not defined by the people who live there, but rather the physical characteristics of which it is composed (Paragraph 2.7.1). As such, character can change over time and it is possible for well-designed proposals to be integrated into an existing community and have a positive effect on that area (SDG - Paragraph 2.7.1).
- 8.16 In light of the SDG's (2019) identification of what does not define character, the fact that the proposed development would result in a single-family building being replaced with a multi-family building is not negative mark against the proposal. Furthermore, it is noted that family neighbourhoods are not limited to areas comprised of only single-family houses as families can live within multi-dwelling buildings. In this regard, the proposed development would provide five (5) family-sized dwellings that would help bring larger families to the local area.
- 8.17 In attempting to provide a well-designed proposal, the SDG (2019) advises that development does not need to replicate existing qualities and can evolve the character of an area by referencing and reinforcing existing architectural styles or introduces new well-designed architectural styles that add interest to the area including increased building sizes (Paragraph 2.7.2).
- 8.18 The design of the proposed two/three-storey building adopts the architectural-styling of an Arts and Craft inspired semi-detached dwellinghouse, which are original to the local area. However, it applies these architectural elements (i.e. diaper pattern brickwork, gable-end projections, lead dormers and prominent chimney) on a new build that would maximise its bulk and massing rather than

evolve/expand over time. As such, it adopts the Contemporary Reinterpretation approach to responding to character described in the SDG (2019). The implementation of the proposal would result in a building that embraces the prevailing character and vernacular of the locality so as to blend-in rather than create a signature structure that would stand apart. Nevertheless, this recommendation includes a condition requiring the submission and approval of further details on the facing materials to be used in the development of the proposed building.

- 8.19 The SDG (2019) states that balcony design is an integral part of a proposal and must be part of the initial design phase (Paragraph 2.26.1) rather than an amenity to be rejected outright. In this regard, the inset balconies proposed for the loft level would be a new feature in the immediate area but one that has been carefully designed as part of the overall scheme to ensure their appearance is integrated into the design and appearance of the rear elevation of the proposed two/three-storey building. Therefore, they are considered to be acceptable.

Height and Scale

- 8.20 According to Croydon's Local Plan (2018), development proposals should seek to achieve a height of three-storeys while respecting the height of existing buildings (Policy DM10.1). In this regard, the proposed development would provide residential accommodation and supporting amenities across three (3) internal levels that have the appearance of a two-storey building typical of the local area. It is acknowledged that in order to accommodate these three (3) levels, the main ridgeline of the proposed building would rise almost 4.0m higher than the peak of the existing dwellinghouse. However, it is noted that the height of the proposed building would be line with that of the house located at the adjoining property to the southeast (no. 88A Bradmore Way). Such a relationship between neighbouring buildings is common along Bradmore Way as neighbouring buildings do not always have step-down in height that corresponds to a change in level between properties yet protect through views to Farthing Downs (See: Image 8.2).

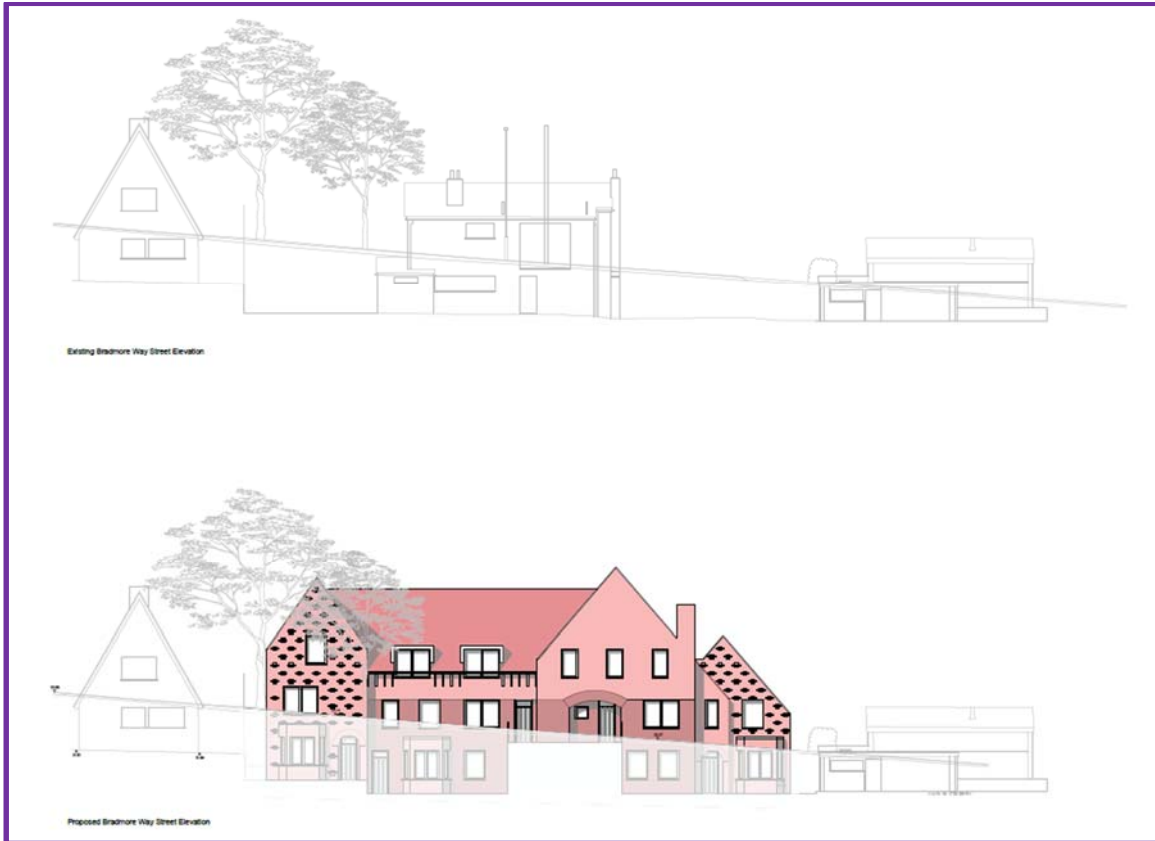


Image 8.1: Existing (top) and Proposed (bottom) Street Scene.



Image 8.2: Lack of step-down in roof height along Bradmore Way.

Form and Massing

- 8.21 When a development would result in a building projecting beyond a rear building line, the SDG (2019) states it should follow a 45-degree rule (See: Image 8.3) to avoid any detrimental impacts on adjoining amenity (Paragraph 2.11.1). However, the SDG also advises caution when dealing with the 'stepping' that could result from adhering the 45-degree rule and states that no stepping should be introduced where the stepping would overly complicate the development's form (Paragraph 2.11.3).
- 8.22 As illustrated on the 45-Degree Outlook Test drawings (dwg. 20.043.130 and 20.043.132) listed in the Approved Plans, the areas of the proposed building that would project beyond the rear building lines of the original dwellinghouse and existing neighbouring buildings would comply with the 45-degree rule test on elevation and plan. The considerate design of the proposed building allows the development to blend into its surrounding and provide a logical evolution to the pattern of development of the local rear garden setting.

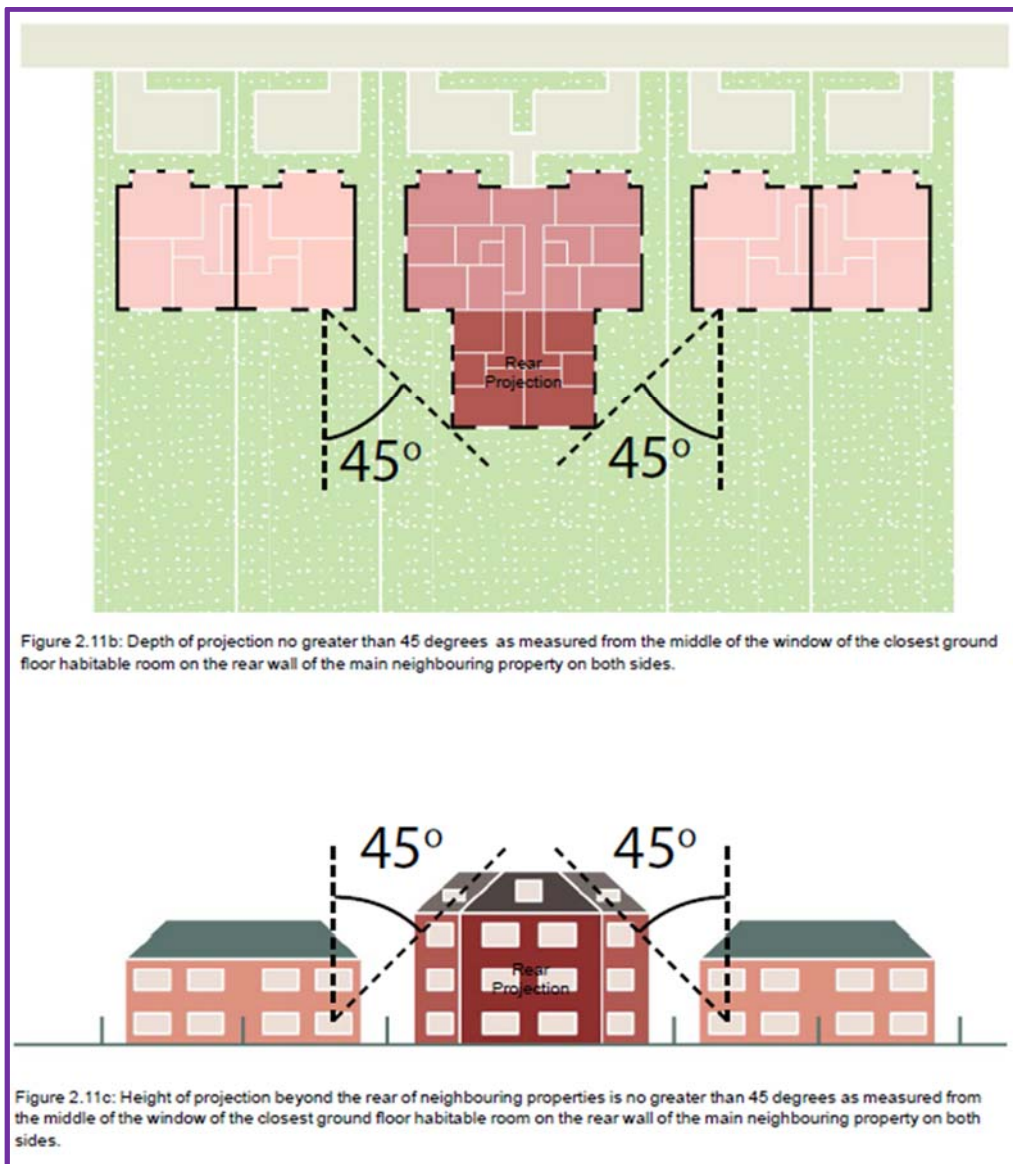


Image 8.3: 45-Degree Test Rule.

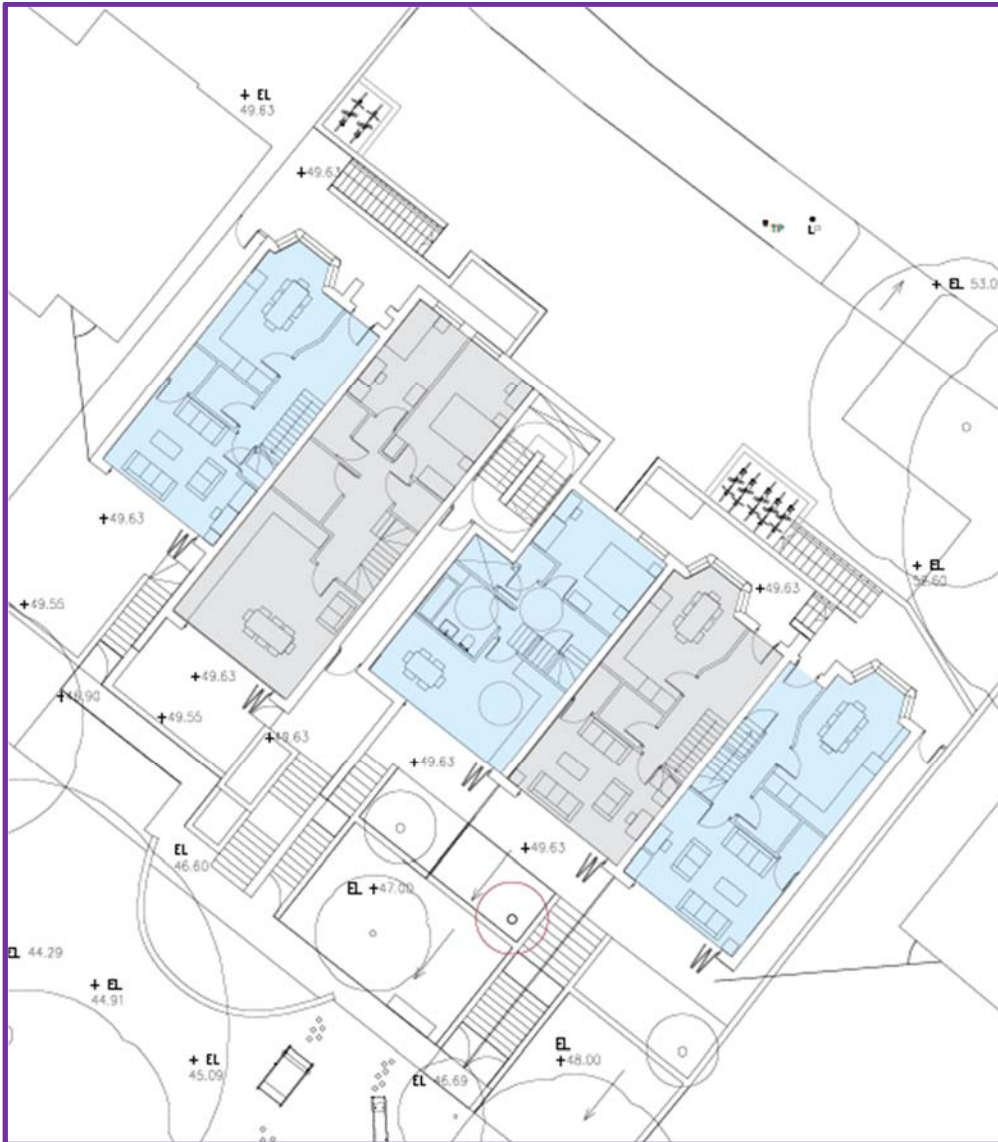


Image 8.4: 45-Degree Test on plan.



Image 8.5: 45-Degree Test on elevation.

- 8.23 In regard to the width of redevelopment proposals such as the subject application, the SDG (2019) states that the width of a proposal should be determined by the appearance within the streetscene and proposed proportions and fenestration of the front elevation (Paragraph 2.17.2). Additionally, developments that seek to build closer to the boundary with neighbouring plots must demonstrate consideration to the impact on neighbouring amenity as well as the rhythm of development along the street (SDG - Paragraph 2.16.2).
- 8.24 It is acknowledged that the proposed two/three-storey building would project beyond the side building lines of the existing dwellinghouse and encroach upon the property's side boundaries. However, it is also noted that the host property is essentially a double width property. Therefore, the width of the proposed building would be similar to that of a pair of semi-detached houses with side extensions developed on a similarly-sized pair of adjoining properties. As many of the pairs of semi-detached properties original to Bradmore Way have developed in such a manner, the proposal would not result in a width and pattern of development out of keeping with that of the local built environment. Additionally, it is noted that the flank walls would be setback from the side boundaries of the property by at least 1.2m in keeping with the similar side setbacks of the neighbouring houses.

Local Amenity

- 8.25 The Croydon Local Plan (2018) states the Council will support development proposals that ensure they protect the amenity of the occupiers of adjoining buildings and do not result in: direct overlooking at close range or habitable rooms in main rear / private elevations; significant loss of existing sunlight/daylight levels of adjoining occupiers; and direct overlooking of private outdoor space (with the exception of communal open space) within 10.0m perpendicular to the rear elevation of a dwelling (Policy DM10).

Enclosure & Impact on Light

- 8.26 It is noted that the proposed two/three-storey building would be set away from the side boundaries with the adjoining properties of nos. 82 and 88A Bradmore Way by approximately 1.2m. While the proposed building would be taller than the existing dwellinghouse, the buffers between the building and adjoining properties would be sufficient to avoid any undue enclosure of the adjoining properties. The adequacy of the separation distances to be provided are evident in the findings of the External Daylight Study prepared by Base Energy Services Ltd. that concluded the losses of daylight and sunlight and neighbouring properties would be negligible and within reason according to the relevant BRE Guidance.

Impact on Outlook

- 8.27 As noted previously in this report (Images 8.4 and 8.5), the proposed building's projection beyond the rear building lines of the buildings at the adjoining properties to the side would not encroach beyond the 45-degree rule tests described and illustrated in the SDG (2019). Therefore, it is noted that the proposed development would not give rise to any undue enclosure or losses of outlook from the neighbouring properties.

Impact on Overlooking

8.28 It is noted that the door and window openings proposed for the front and rear elevations of the proposed two/three-storey building would have no more of an impact on privacy at neighbouring properties than existing openings located on the same elevations of the existing dwellinghouse. Similarly, the recessed design of the rear balconies proposed would ensure no new opportunities for the overlooking of areas currently out of sight.

Noise & Activity

8.29 Although the proposed development would increase the intensity of the residential use of the site, the density of development would be in keeping with carrying capacity and scale of the large suburban property. Therefore, the level of activity, disturbance and noise generated by the redevelopment would be in keeping with the levels expected in an area that can accommodate moderate intensification. However, the recommendation includes numerous noise-related conditions that would ensure noise emissions from mechanical equipment associated with the development are acceptable.

Quality of Accommodation

8.30 According to the Technical Housing Standards – Nationally Described Space Standard (2015), all of the dwelling unit proposed would provide a sufficient amount of Gross Internal Area (GIA) (See: Table 3.0). As such, all dwelling units proposed are deemed capable of providing acceptable amounts of living space to future occupants due to the practicality, efficiency and effectiveness of their internal layouts.

Dwelling	Floorspace Provided	Floorspace Required	Number of Bedrooms	Type of Bedrooms	Occupancy
Unit 1	144.5sqm	124.0sqm	4	4 Doubles	8
Unit 2	136.2sqm	124.0sqm	4	4 Doubles	8
Unit 3	112.1sqm	93.0sqm	3	2 Doubles & 1 Single	5
Unit 4	131.2sqm	93.0sqm	3	2 Doubles & 1 Single	5
Unit 5	93.4sqm	93.0sqm	3	2 Doubles & 1 Single	5
Unit 6	61.2sqm	61.0sqm	2	1 Double & 1 Single	3
Unit 7	69.2sqm	61.0sqm	2	1 Double & 1 Single	3

Table 3.0: Details of dwellings to be provided.

8.31 In addition to having practical and comfortable layouts, the proposed dwellings would be located far enough away from neighbouring buildings to benefit from pleasant outlooks and good levels of natural light. Additionally, the habitable rooms to the front of the proposed building that would open onto communal areas or be in the path of the headlights of vehicles access the forecourt would be provided with adequate screening in the form of hanging planters.

8.32 In order to provide suitable housing and genuine choice for London’s diverse population (incl. disabled people, older people and families with young children), residential development must ensure that at least ten percent (10%) of dwellings are compliant with Building Regulation M4(3) and all remaining dwellings are compliant with Building Regulation M4(2) (London Plan - Policy D7). As the proposed development would provide one (1) dwelling (Unit 3) as a M4(3) compliant unit and the remaining as M4(2) compliant units, the proposal would be sufficiently accessible. Consequently, the proposal adheres to local and regional policies requiring the internal areas of housing developments to be of the highest quality.

Amenity Space

8.33 According to local and regional policy, housing is expected to be of the highest quality both internally and externally (London Plan - Policy D6; Croydon Local Plan - Policy DM10). In regard to the latter, the noted policies require 5.0sqm of private outdoor space to be provide for one to two-person units with an extra 1.0sqm per every extra occupant thereafter. Furthermore, the London Plan (2021) expects these spaces to be practical in terms of their shape and utility so as to ensure the space offers good amenity (Policy D6).

8.34 As noted above, every dwelling unit would be provided with private amenity space in the form of a patio for ground floor units and a balcony for upper floor dwellings. In regard to quality, each of these amenity spaces would be considered genuine, fit-for-purpose, and sufficiently-sized (Table 8.1). Additionally, the 362.1sqm communal amenity space to be located in the rear garden would provide over 50.0sqm of high-quality open space per unit.

Dwelling	Area of Balcony/Patio	Area Required	Complaint
Unit 1	20.5sqm	11.0sqm	Yes
Unit 2	15.0sqm	11.0sqm	Yes
Unit 3	14.7sqm	8.0sqm	Yes
Unit 4	15.3sqm	8.0sqm	Yes
Unit 5	27.0sqm	8.0sqm	Yes
Unit 6	6.0sqm	6.0sqm	Yes
Unit 7	6.0sqm	6.0sqm	Yes

Table 8.1: Details of dwellings to be provided.

8.35 In addition to providing general outdoor amenity space, the Croydon Local Plan (2018) requires flatted development to provide a minimum of 10.0sqm per child of new play space (Policy DM 10.4). As such, the proposed development would need to provide at least 38.8sqm of play space. By proposing to use a section of the communal rear garden as play space, the development would be able to provide the necessary quantum of play space.

8.36 In regard to the quality of the amenity spaces to be provided, it is acknowledged that the local topography (i.e. the significant slope within the rear garden) is a challenge to providing highly usable space. The layout of the amenity spaces addresses this issue by providing private amenity spaces with step-free access. As such, the communal spaces supplement the private amenity that would address the need for readily available amenity space. Although the private amenity spaces may not provide a significant amount of play space, communal

play spaces are a common and acceptable amenity that offers the benefits of social interaction among children from different households and the natural surveillance of multiple households. In order to ensure the quality and suitability of the proposed communal amenity spaces, this recommendation includes a condition requiring the submission and approval of further details on the: arrangement and type of play equipment to be installed, garden furniture to be provided in common spaces, and measures to ensure accessibility for users of varying abilities.

Urban Greening

- 8.37 According to local and regional policy, the inclusions of urban greening measures (e.g. high-quality landscaping, green roofs and green walls) must be provided to increase the green cover in London (London Plan - Policy G5; Croydon Local Plan - SP7). Additionally, the Council seeks to protect and enhance the borough's woodlands, trees and hedgerows by requiring all development proposals to comply with the recommendations of BS5837 2012 (Trees in relation to design, demolition and construction) or equivalent and resists development that would result in the avoidable loss or the excessive pruning of preserved trees or retained trees (Croydon Local Plan -- Policy DM28).

Landscaping & Biodiversity

- 8.38 As the inclusion of urban greening measures in new development will result in an increase in green cover, the London Plan (2021) states that such measures should be integral to planning the layout and design of new buildings and developments (Policy G5). However, it is noted that only major developments are required by regional policy to achieve an identified urban greening factor (UGF). Nevertheless, both local and regional policy requires development proposals to manage impacts on biodiversity and aim to secure net biodiversity gain, (London Plan - Policy G6; Croydon Local Plan - Policies DM27 and SP7). Additionally, the Croydon Local Plan (2018) notes that development should seek to retain existing landscape features
- 8.39 As noted above, tree-lined streets and front gardens are characteristic of the leafy suburban area that is Coulsdon. In this regard, it is acknowledged that the raised platform required to form the forecourt proposed would result in the loss of the plantings on the sloped front garden. However, it is also noted that the raised platform would accommodate the retention of existing trees. Additionally, the soft landscaping to be provided atop the platform (incl. a single tree) would off-set the loss of the existing soft landscaping, which has made a limited contribution to the visual amenity of the street scene due to its sunken location.
- 8.40 At the rear of the property, it is acknowledged that the removal of vegetation and trees required to implement the proposed development would be notable. However, this loss would not result in the loss of any identified protected habitat or species. Furthermore, any damaging ecological losses resulting from the implementation of the subject proposal would be avoided as this recommendation includes a condition requiring the submission and approval of a Protected and Priority Species Site Survey and, if necessary, Impact Management Plan.

- 8.41 The losses of existing soft landscaping in the rear garden would be off-set by the planting of multiple new trees in the rear garden. Additionally, the landscaping plan included in the proposal would take advantage of the challenging change in levels across the application property to provide a coherent, navigable and softly landscaped environment that would enhance biodiversity and provide direct access to nature for multiple households. In particular, it is noted that it is noted that the palette of shrubs to be planted would be diverse and the species of trees identified should be suitable for the locality.

Trees

- 8.42 In order to protect and enhance the borough's woodlands, trees and hedgerows, the Council requires all development proposals to comply with the recommendations of BS5837 2012 (Trees in relation to design, demolition and construction) or equivalent and resists development that would result in the avoidable loss or the excessive pruning of preserved trees or retained trees (Croydon Local Plan -- Policy DM28).
- 8.43 While the proposal would involve the loss of multiple mature trees, it is noted that the trees to be felled were no higher than Category C including two (2) trees classified as dead (Category U) and none subject to tree preservation orders (TPO)*. Additionally, the loss of a single group of trees and three (3) individual trees would be off-set by the planting of two (2) feature trees in the front garden and three (3) trees in the rear garden. In regard to the trees to be planted, the types proposed should be acceptable in terms of canopy, height and species. To ensure that the arboricultural methods, tree protection plan, and tree planting programme to be used are acceptable and implemented in full, this recommendation includes a Arboricultural Method Statement and Landscaping Management plan conditions designed to secure the submission and approval of the aforementioned details and programme prior to the first occupation of the development.

***Note:** The use of the raised platform within the proposed parking area, would assist with the prevention of any protected trees needing to be felled to accommodate the proposed development and dropped kerb.

Local Transport

- 8.44 Development within the borough and Greater London is expected to deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling. (London Plan - Policy T2; Croydon Local Plan - Policies DM16, DM29 and SP8). Therefore, the cumulative impacts of development on public transport and the road network capacity (incl. walking and cycling), as well as associated effects on public health must be considered and mitigated (London Plan - Policy T4). Additionally, development proposals must also avoid increasing highway danger (London Plan - Policy T4).
- 8.45 As vehicle access to the site is not constrained, future occupants would be able to benefit from the possible use of private vehicles. Additionally, the site's very poor PTAL Rating of 1B does not reflect the legitimate potential for future

occupants to be utilise a variety of modes of transport including walking, cycling, and using public transport.

Access Arrangements

- 8.46 Pedestrians would be able to access the main building from street level via a ramp leading to single communal and private front entrances. As such, future occupants of the units served by these entrances would be provided with a traditional 'front door' and accessible step-free route. The ramp would also provide convenient access to the cycle stores located on the upper ground floor level. In contrast, future occupants of the units accessible via lower ground floor entrances and those storing their bicycles at the lower level would need to navigate stairs.
- 8.47 Two (2) vehicle crossovers to Bradmore Way would provide vehicular access to the five (5) off-street parking spaces to be provided on the raised platform. The existing 3.6m wide vehicle crossover would be widened to 5.0m while a new 3.5m crossover would be formed to the southeast. This redevelopment would have no impact on existing street trees and the proposed visibility splays would be acceptable. Nevertheless, this recommendation includes a landscaping condition that would ensure the boundary treatments and steps in close proximity to the vehicle access would not be a detriment to pedestrian, cyclist and vehicle safety. Additionally, conditions regarding a Construction Logistics Plan, highways conditions survey, threshold levels, and a Section 278 Legal Agreement are also included.

Car Parking

- 8.48 According to the London Plan (2021), developments located in Outer London areas with a PTAL of 1B should provide no more than one and a half (1.5) vehicle parking spaces per unit (Table 10.3). As such, the seven (7) unit proposal should provide no more than eleven (11) parking spaces. Since the proposal includes five (5) off-street parking spaces, it is compliant with the London Plan (2021) and its strategic objectives to discourage unsustainable travel patterns, which can mean not providing the maximum number of spaces allowed.
- 8.49 On suburban sites such as the host property, the Council would expect a residential development to generate a demand of one (1) vehicle parking spaces per dwelling unit. As such, the proposal would be expected to generate a demand for seven (7) vehicle parking space resulting in an overspill from the development site onto local streets of two (2) vehicles. A Parking Survey of the 200.0m of Bradmore Way on either side of the application site submitted by the Applicant concluded that the proposed development would not unduly increase local on-street parking stress since these streets displayed sufficient overnight capacity (i.e. 42.7% average occupancy of the one-hundred and nine (109) spaces available).

- 8.50 Considering how close future occupants would be to local bus stops, Coulsdon Town Centre and Coulsdon South rail station and the fact that they would be provided with amenities to accommodate cycling, it is noted that sustainable modes of transport (incl. e-bikes) would make low-car lifestyles viable. Furthermore, the development would be required to contribute to improving sustainable transport in the area.
- 8.51 Swept paths for the parking spaces are provided (using a 4.8m car as required), demonstrating that the spaces are accessible for ingress and egress in forward gear. Additionally, one (1) disabled car parking space is to be provided with extra width to enable manoeuvring.
- 8.52 A contribution of £10,500 will be secured via S106 agreement to contribute towards sustainable transport initiatives in the local area including on street car clubs with electric vehicle charging points (EVCPs) within the South Croydon / Purley Oaks area as well as general expansion of the EVCP network in the area in line with Local Plan policies SP8.12 and SP8.13. The funding will go towards traffic orders at around £2500, signing, lining of car club bay, EVCP provision including electrics and set up costs for the car club. Additionally, every residential unit is to be provided with a minimum 3-year membership to a local car club scheme upon 1st occupation of the unit. Funding secured will also be used for extension and improvements to walking and cycling routes in the area and improvements to local bus stops to support and encourage sustainable methods of transport.
- 8.53 Conditions will be attached to require a condition survey of the surrounding footways, carriageway and street furniture prior to the start of any works on site. This would need to be accompanied by photos and a report of any areas which may be of concern (this would be secured as part of the CLP condition). Given the site's location a Construction Logistics Plan (CLP) is required and will be secured by condition. Lastly, details of the provision of active and passive EVCPs in accordance with Policy T6.1 of the London Plan (2021) will also be secured via pre-commencement condition.

Cycle Parking

- 8.54 In order to encourage the use of cycling as a primary mode of transport, the redevelopment would be required to provide two (2) short-stay cycle parking spaces and fourteen (14) covered and secured long-stay cycle storage spaces as per Table 10.2 of the London Plan (2021). According to the Proposed Plans, suitably located cycle stores at the lower and upper ground floor levels would be able to provide all of the requisite spaces and in an acceptably accessible manner. Therefore, this recommendation includes a cycle storage condition that would secure the required provision including the electrical sockets required to accommodate the charging of e-bike to assist cyclists with the challenges of the local topography.

Environmental Sustainability

Air Quality & Water Use

- 8.55 In order to reduce greenhouse gas emissions and deliver development that is adaptable in a changing climate, the Council requires minor new-build residential developments to achieve the national technical standard for energy efficiency in new homes (2015) and all new-build residential development to meet a minimum water efficiency standard of 110.0l per person per day (Local Plan - Policy SP6). In this regard, Energy Statement for Planning (ref. 8540 Rev. 2) prepared by Base Energy Services Ltd. notes that the proposal would achieve both targets. Therefore, this recommendation includes an Emission Rate & Water Use condition designed to ensure future compliance.

Flood Risk Management

- 8.56 In order for the Council to ensure that development within the borough reduces flood risk and minimises the impact of flooding, Policy DM25 of the Croydon Local Plan (2018) requires development proposed within areas at risk of flooding development to incorporate flood resilience and resistant measures into the design, layout and form of buildings to reduce the level of flood risk both on site and elsewhere.
- 8.57 As the application site is located within a Critical Drainage Area, the applicant submitted a requisite Flood Risk Assessment (FRA). According to the submitted FRA, the proposed development would help manage flood risk through the installation of a Sustainable Urban Drainage System (SUDs) that would incorporate the utilisation of rainwater recycling (i.e. water butts), planting of rain gardens to allow for rain water attenuation, and formation of soakaways to gradually disperse surface water. Considering the scale of the proposed development and identified flood risks, this SUDs proposed would be acceptable. Therefore, this recommendation includes a SUDs condition designed to ensure that details of design and installation of the identified measures are submitted to and approved by the Local Planning Authority prior to the commencement of above ground works.

Waste Management

- 8.58 The London Plan (2021) requires new housing to provide adequate and easily accessible storage space that supports the separate collection of dry recyclables and food waste, as well as, residual waste (Policy D6). It is supported locally by Croydon's Waste and Recycling in Planning Policy Document (2018) that requires a flattened development of the proposal's size and arrangement to provide enough bins and bin storage space within the curtilage of the property to handle the approximately 140.0l of food waste, 896.0l of recycling waste and 1,080.0l of landfill waste that would be generated by the proposed dwellings on a weekly basis (Section 4). According to the drawings submitted with the application, there is sufficient space within a proposed forecourt bin store to integrate the requisite waste storage facilities. Therefore, this recommendation includes a Waste Storage Management condition designed to secure the provision of the requisite facilities and management procedures.

Fire Safety

- 8.59 According to Policy D12 of the London Plan (2021), all development proposals must achieve the highest standards of fire safety and ensure that they identify suitable outdoor space for fire appliances and assembly points; incorporate appropriate fire safety features; minimise the risk of fire spread; provide suitable and convenient means of escape (incl. a robust strategy for evacuation); and suitable access and equipment for firefighting.
- 8.60 The details on fire safety and risk management contained within the Planning Statement Addendum 1: Fire Safety prepared by HTA Design LLP are considered to provide sufficient and appropriate fire safety measures/procedures in accordance with regional policy. This recommendation includes a Fire Safety condition designed to ensure that the identified measures/procedures are implemented.

Other Matters

- 8.61 All material considerations have been taken into account, including responses to the public consultation. Taking into account the consistency of the scheme with the Development Plan and weighing this against all other material planning considerations, the proposal is considered to be acceptable in planning policy terms.
- 8.62 The development would be liable for a charge under the Community Infrastructure Levy (CIL).
- 8.63 All other planning considerations including equalities have been taken into account.

Conclusion

- 8.64 The proposed development would considerably optimise the housing potential of a large suburban property through the erection of a sympathetically-design two/three-storey building that would be a positive addition to the local street scene, provide high-quality dwelling units with the necessary supporting amenities, and contribute to biodiversity, sustainable transport and urban greening. Furthermore, the comprehensive design and layout of the proposed development would help meet local and regional objectives on providing the housing Londoners need (incl. family-sized homes) without generating any detrimental impacts on fire safety, local amenity and local transport. Therefore, it is recommended that Planning Permission be **GRANTED**.