

**1.0 APPLICATION DETAILS**

Ref: 21/01274/FUL  
 Location: 100 Reddown Road Coulsdon CR5 1AL  
 Ward: Coulsdon Town  
 Description: Demolition of the existing dwelling and redevelopment of the site to provide 9 flats in a new 3/4 storey building including living accommodation in the roof space with associated car parking, landscaping and cycle storage.  
 Drawing Nos: 4193/OS; EE Rev C; LGSP Rev C; 4193 GF Site Plan Rev C; LGGFP Rev C; SFFP Rev C; FE Rev C; NSE Rev C; Re Rev C; SSE Rev C; STS Rev C; SD  
 Agent: Lee Richardson, LPR Design  
 Applicant: Mark McElduff, MacGroup Ltd  
 Case Officer: Yvette Ralston

	<b>1 bed</b>	<b>2 beds</b>	<b>3 bed</b>	<b>TOTAL</b>
<b>Existing</b>	0	0	1	1
<b>Proposed</b> (all market housing)	2 (2x1b2p)	4 (4x2b3p)	3 (1x3b4p, 1x3b5p, 1x3b6p)	9

<b>Number of car parking spaces</b>	<b>Number of cycle parking spaces</b>
4	19

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
- Referral to committee from Cllr Luke Clancy

**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 £13,500 for sustainable transport improvements and enhancements.
- Removal of parking permits in the CPZ for all new residents
- 3 of the parking spaces to be allocated to the 3 family sized units

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

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

#### CONDITIONS

1. Commencement time limit of 3 years
2. Development to be carried out in accordance with the approved drawings and reports

#### Pre-commencement conditions

3. Submission of Construction Management Plan and Construction Logistics Plan
4. Construction Environmental Management Plan for Biodiversity
5. Materials / design details to be submitted
6. Submission of landscaping, child play and communal amenity space details including a 1-1.2m high hedge at the front, and 4 replacement trees.
7. Submission of SUDS details
8. Biodiversity enhancement strategy

#### Pre-occupation / compliance conditions

9. Obscure glazing on flank windows above ground floor level
10. Compliance with Arboricultural Assessment and Tree Protection Plan
11. Compliance with Ecological Appraisal recommendations
12. Detail of cycle storage, plus 2 visitor spaces, and implementation of refuse storage as shown on plans prior to occupation
13. Implementation of car parking as shown on plans with no boundary treatments above 0.6m in the sightlines
14. Installation of EVCPs at 20% active and 80% passive
15. Development in accordance with accessible homes requirements
16. Compliance with energy and water efficiency requirements
17. Any other planning condition(s) considered necessary by the Director of Planning and Strategic Transport

#### INFORMATIVES

1. Granted subject to a Section 106 Agreement
2. Community Infrastructure Levy
3. Code of practice for Construction Sites
4. Highways informative in relation to s278 and s38 works required
5. Compliance with Building/Fire Regulations
6. Construction Logistics Informative (in relation to condition 3)
7. Refuse and cycle storage Informative (in relation to condition 8)
8. Any other informative(s) considered necessary by the Director of Planning and Strategic Transport

### **3.0 PROPOSAL AND LOCATION DETAILS**

#### **Proposal**

- 3.1 The applicant seeks full planning permission for the following:

- Demolition of the existing part 1, part 2 storey detached dwelling
- Erection of a replacement building of 3 storeys plus roof comprising 9 flats
- 4 parking spaces on the front forecourt and 19 cycle parking spaces within the ground floor of the building
- Communal and private amenity space, play space and hard and soft landscaping



- 3.2 During the assessment of the application, minor amendments to the design and site plan have been made, including:
- A reduction in the height of the front and rear gables
  - Insetting of the front door to accentuate the entrance and removal of the canopy above
  - Retention of the hedge in the rear garden on the southern boundary (H2)
- 3.3 These amendments were not material in nature and did not require public re-consultation.

### **Site and Surroundings**

- 3.4 The application site is located on the west side of Reddown Road, to the north of the junction with Westwood Road. Beyond the rear garden to the west is the railway line. The property on the site is a two storey detached dwelling with a pitched roof, clad in peddle dash. It has an attached single storey garage and space for parking of one car on the forecourt. The front boundary treatment is a low brick wall. The topography slopes gently downwards from the front to the back of the site; currently the entrance to the property is sited around 1m below the pavement, with steps leading down to the front door, and at the rear there

are steps down from the patio to the grass which is around 1m lower. There are trees and hedges on the site but none are protected by TPO.

- 3.5 The wider area is suburban and residential in character comprising detached two storey properties with hipped roofs and front gables. The site has a Public Transport Accessibility Level (PTAL) of 1b which is very poor, but it is within 750m walking distance of Couldson South train station. The site is at low risk of surface water flooding.



*Aerial view of site*

### **Planning History**

- 3.6 Site history is set out below.

<b>Reference</b>	<b>Description</b>	<b>Decision</b>	<b>Date</b>
15/05201/LP	Alterations and use of part of garage as habitable room	LDC granted	04.01.2016
83/00904/P	Erection of single storey rear extension & covered walkway	granted	19.07.1983

- 3.7 A pre-app took place before submission of the current scheme:

20/03621/PRE: Demolition of the existing dwelling and redevelopment of the site to provide 9 flats in a new 3/4 storey building including living

accommodation in the roof space with associated parking, landscaping and cycle storage.

#### 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.
- The proposal includes a mix of different sized units including 30% 3-bed units and provides a decent quality of accommodation for residents.
- The design and appearance of the development would not harm the character of the surrounding area.
- The living conditions of adjoining occupiers would be protected from undue harm.
- The quantity of parking provision and impact upon highway safety and efficiency would be acceptable.

#### 5.0 CONSULTATIONS

5.1 Discussion with internal consultees within the Planning Service including Spatial Planning (Design), Highways, Trees and Ecology has taken place and is referred to within the report as appropriate.

#### 6.0 LOCAL REPRESENTATION

6.1 The application was publicised by 4 letters of notification to neighbouring properties. The number of representations received in response to the consultation are as follows.

6.2 No of individual responses: 350; Objecting: 264; Supporting: 85

6.3 Note that 1) there are many examples of duplicate representations / resubmissions from the same address and these have each been counted as individual reps; and 2) many of the supporting comments are from people living outside the borough.

6.4 The following objections were raised in representations. Those that are material to the determination of the application, are addressed in substance in the Material Planning Considerations section of this report.

Objection	Officer comment
<b><i>Character and design</i></b>	
Overbearing, too high, too large, bulk and mass harmful to the streetscene, depth too great. 9 flats is overdevelopment	Addressed in paragraphs 8.5-8.13 of this report
Not in keeping with the area. The Hooley House Estate is mainly Edwardian houses	

Contemporary design inappropriate. Features are incongruous and unsophisticated such as oversized fascias, excessive reveals, gable apex glazing, large fenestration which does not respect the neighbouring buildings.	
1.2m to the boundaries is not acceptable	
Red brick out of place as most buildings are white render.	
<b>Highways impacts</b>	
4 parking spaces is an under-provision. (The census says that Coulsdon residents own 1.5 cars on average)	Addressed in paragraphs 8.36-8.43 of this report
The access near Westwood Avenue will create hazards for road users	
Will result in increased traffic	
People will still own cars regardless. Nearest schools and nurseries are quite a long walk and walking distance to supermarket is 1.1km which is inconvenient with heavy bags	
With the rise of electric cars we do not need to discourage cars	Noted
Cars will park on the yellow lines and just move them every day between 11-12pm so the parking issues cannot be avoided in the CPZ by removing permits.	This is unlikely / impractical
The yellow line parking restrictions on the road are to stop commuters for Coulsdon South parking on the road. The council has said that no further parking permits will be granted on the road.	Noted / agreed
No provision for electric vehicle charging	EVCPs to be required by condition
The road is used as backroad to avoid travelling through Coulsdon Town.	Noted
The highway code states there should be no parking within 10m of a junction	The Highway Code still applies. Cars should not park within 10m of the junction but this cannot be controlled by planning.
If adequate parking can't be provided on site then the size of the development should be decreased.	4 parking spaces is considered to be an acceptable balance in terms of limiting intensified use of a crossover opposite a junction v. encouraging

	sustainable transport / reduced car ownership amongst occupiers.
<b>Quality of accommodation</b>	
Insufficient space for working from home	This is not a planning requirement. All units meet the space standards and WFH would be possible.
How are disabled people and young families catered for in this development?	The proposal is M4(2) and M4(3) compliant and play space is proposed.
The flats are cramped and poor quality. Dark and unwelcoming LGF units	Addressed in paragraphs 8.14 to 8.20 of this report.
Families need private gardens	Private balconies and a communal garden are proposed.
<b>Neighbouring amenity impacts</b>	
Overshadowing of neighbours, daylight and sunlight impacts on number 98.	Addressed in paragraphs 8.21-8.27 of this report
Loss of privacy and overlooking from balconies	
Blank walls on north and south elevation will be imposing for neighbours, affecting their visual amenity.	
Side windows should have frosted glass for privacy	
Fencing should be 2m, not 1.8m high	
<b>Impacts on trees, ecology and the environment</b>	
Loss of trees, vegetation, green space and natural habitats	Addressed in paragraphs 8.28-8.35 of this report.
Not appropriate near to nature reserve	
Hedgehogs, slow worms and badgers have been seen nearby	
Additional cars will increase air pollution	Noted. Unfortunately this is not a major application so contributions cannot be sought towards air pollution mitigation.
Climate change	
Objection to the removal of the hedge on the boundary with number 102 which is largely within the garden of number 102.	This hedge (H2) is now to be retained.
The Wildlife & Countryside Act (as amended) 1981 Schedule 5 applies to the application. There is significant wildlife in number 98 including wildlife ponds, frogs, newts, slow worms in the compost, grass snakes, birds, etc.	Impacts have been assessed in the Ecology Assessment. Addressed in paragraphs 8.32 to 8.35 of this report.

<b><i>Flooding</i></b>	
Hardstanding will cause flooding issues	Addressed in paragraph 8.46 of this report.
Pressure on sewage system. There has been sewage flooding in the street.	
The application states that SuDs will not be used, even though the flood risk analysis assessment states it will be.	
<b><i>Other</i></b>	
Noise, traffic, rubbish generated by residents	Any noise from residential units would not be out of the ordinary in a residential location. Rubbish will be contained in the refuse store.
Intensification no longer justifiable following the reduction in London Plan housing targets	Croydon's housing targets are for 2,079 homes PA. The proposed scheme is policy compliant.
Density is in excess of London Plan	Density calculations are no longer a key policy consideration in the new London Plan (2021)
Construction noise	A Construction management plan would be required by condition
Area already saturated with flats e.g. Cane Hill and development at 116. Many are unsold. No demand for 1-bed flats in the area.	Flats are an appropriate form of housing
Impacts on infrastructure and utilities - sewage, schools, GPs. There are only 7 health facilities in the south of the borough and 49 in other parts of the borough.	A CIL contribution will be sought
How much of the CIL is spent in Coulsdon and where?	Details of CIL spending is available in the Council's Annual Monitoring Report (although may not be broken down by area)
Too many flats/people in Coulsdon. Coulsdon has had 2700 developments in the last 5 years.	
The Council is strict on householder applications but allows blocks of flats which is an inconsistent approach	Each scheme is assessed on its own merits
Area isn't identified for intensification in Croydon Plan	Housing intensification is appropriate in any location as long as it respects the character of the area and is of a high quality design. The proposed scheme for 9 units is policy compliant.



6.5 The east Coulsdon Residents Association objects to the proposal on the following grounds:

- Does not accord with Local Plan policy for Coulsdon
- Flats not appropriate in Hooley House Estate
- Not in keeping with Edwardian character
- Size is overbearing compared to surrounding 2 storey houses
- Illustrations may be misleading
- Side walls will be detrimental to neighbours
- Mass is incongruous and bulky and visually intrusive
- Balconies will cause overlooking
- Amenity impacts on neighbours
- Size of rear garden insufficient
- Inadequate sewage system in the area. Local gardens flooded with sewage on 20/08/20
- 4 parking spaces is insufficient
- Lack of step free access to communal garden (*Officer note: step-free access is provided internally via the lift*)
- Loss of trees and wildlife
- No need for 1 and 2 bed flats in Coulsdon

6.6 Cllr Luke Clancy, Coulsdon Town Ward, has referred the application to Committee on the grounds of overdevelopment.

6.7 Representations of support stated the following. It is noted that many of the supporting comments are from people who do not live nearby:

- Gentle density, appropriate to surroundings
- Optimum use of space
- Aesthetically pleasing
- Suggest some trees at the front
- Convenient travel route into the city for new occupiers
- New development would be more eco-friendly than the current property

## **7.0 RELEVANT PLANNING POLICIES AND GUIDANCE**

7.1 In determining any planning application, the Council is required to have regard to the provisions of its Development Plan so far as is material to the application and to any other material considerations and the determination shall be made in accordance with the plan unless material considerations indicate otherwise. The Council's adopted Development Plan consists of the London Plan (2021), the Croydon Local Plan (2018) and the South London Waste Plan (2012).

7.2 Government Guidance is contained in the National Planning Policy Framework (NPPF) (2021). The NPPF sets out a presumption in favour of sustainable development, requiring that development which accords with an up-to-date local plan should be approved without delay.

7.3 The main planning Policies relevant in the assessment of this application are:

### London Plan (2021):

- D3 Optimising site capacity through the design-led approach
- D4 Delivering good design
- D5 Inclusive design
- D6 Housing quality and standards
- D7 Accessible housing
- D12 Fire Safety
- H1 Increasing housing supply
- H2 Small sites
- H10 Housing size mix
- S4 Play and informal recreation
- G5 Urban Greening
- G6 Biodiversity and access to nature
- G7 Trees and woodlands
- S11 Improving air quality
- S12 Minimising greenhouse gas emissions
- S13 Energy infrastructure
- S112 Flood risk management
- S113 Sustainable drainage
- T4 Assessing and mitigating transport impacts
- T5 cycling
- T6 car parking
- T6.1 Residential parking
- T7 Deliveries, servicing and construction

### Croydon Local Plan (2018):

- SP2 Homes
- DM1 Housing choice for sustainable communities
- SP4 Urban Design and Local Character
- DM10 Design and character
- DM13 Refuse and recycling
- SP6 Environment and Climate Change
- DM23 Development and construction
- DM25 Sustainable drainage systems and reducing floor risk
- DM27 Protecting and Enhancing our Biodiversity
- DM28 Trees
- SP8 Transport and communications
- DM29 Promoting sustainable travel and reducing congestion
- DM30 Car and cycle parking in new development

### Supplementary Planning Documents/Guidance

- Croydon Suburban Design Guide SPD (2019)
- Section 106 Planning Obligations in Croydon and their relationship to the Community Infrastructure Levy (2019)
- London Housing SPG (Mayor of London, 2016)
- Accessible London: Achieving an Inclusive Environment SPG (Mayor of London, 2014)

- Play and Informal Recreation SPG (Mayor of London, 2012)
- Character and Context SPG (Mayor of London, 2014)
- Sustainable Design and Construction SPG (Mayor of London, 2014)

## **8.0 MATERIAL PLANNING CONSIDERATIONS**

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

- Principle of development
- Design and impact on the character of the area
- Quality of accommodation
- Impact on neighbouring residential amenity
- Trees and landscaping
- Biodiversity
- Access, parking and highways impacts
- Flood risk and energy efficiency

### **Principle of Development**

8.2 The existing use of the site is residential and as such the principle of redeveloping the site for residential purposes is acceptable. Policy SP2.1 of the Croydon Local Plan (2018) applies a presumption in favour of development of new homes and Policy SP2.2 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. London Plan policy D3 encourages incremental densification to achieve a change in densities in the most appropriate way and policy H3 seeks to significantly increase the contribution of small sites to meeting London's housing needs. Given the above, the principle of intensifying the residential use of the site to provide 9 flats - a net increase of 8 homes - is acceptable.

8.3 Policies SP2.7 and DM1.1 set a strategic target for 30% of all new homes over the plan period to have 3 or more bedrooms in order to ensure that the borough's need for family sized units is met, and DM1.2 seeks to avoid a net loss of 3-bed family-sized homes. The proposal is for 1 x 3b6p, 1 x 3b5p, 1 x 3b4p, 4 x 2b3p and 2 x 1b2p units for a total of 9 units. This mix comprises 33% 3-beds and offers a good mix of different sized accommodation.

8.4 The proposed scheme on the site for 9 units would not trigger affordable housing contributions in line with policy SP2 or London Plan policy H4 or H5.

### **Design and impact on the character of the area**

8.5 The existing building on the site is a suburban 2 storey detached property in pebbledash with a pitched roof. The building itself does not hold any architectural merit and there is no in principle objection to its demolition.

8.6 Policies SP4.1 and DM10.1 of the Local Plan state that the Council will require development of a high quality, which respects and enhances Croydon's varied

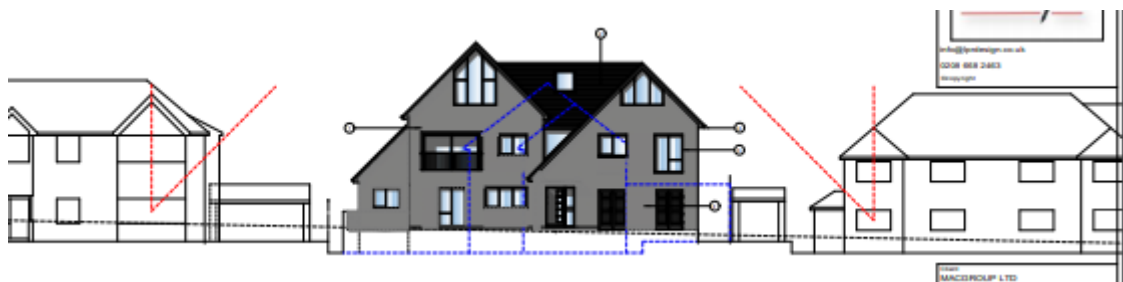
local character and contributes positively to public realm, landscape and townscape. Proposals should seek to achieve a minimum height of 3 storeys, should respect the development pattern, layout and siting; the scale, height, massing, and density; and the appearance, existing materials and built and natural features of the surrounding area. London Plan policy D3 states that a design-led approach should be pursued and that proposals should enhance local context by delivering buildings and spaces that positively respond to local distinctiveness.

- 8.7 The neighbouring properties and the majority of those along Reddown Road and Westwood Avenue are 2 storey detached properties. The Suburban Design Guide SPD indicates that in this context it is appropriate for new developments to be 3 storeys plus an additional storey contained within the roof or set back. The proposal is 3 storeys from the front (including roof space), with a ridge height that is 1.5m higher than number 98 and 1.6m higher than number 102 at its highest point, which is acceptable. The building appears as 4 storeys from the rear due to the slope of the land, which is also acceptable and compliant with policy guidance. The building is considered to sit comfortably within the streetscene and to respect the height of neighbouring properties.



Figure 2.10c: Where surrounding buildings are predominantly detached dwellings of two (2) or more storeys, new developments may be three (3) storeys with an additional floor contained within the roof space or set back from the building envelope below.

*Extract from Suburban Design Guide SPD (surrounding buildings 2 storey detached)*



*Proposed streetscene elevation – Reddown Road*

- 8.8 The proposed building is wider than the existing building on the site but it retains the spacious feel of the plot and the area by maintaining appropriate separation distances between neighbouring properties. The separation distance to the site boundary on both sides is around 1.4m, with a building to building separation of around 8m between neighbouring buildings on either side. The single storey garages attached to neighbouring properties on either side plus the step down in height of the building to single storey with pitched roof on its south (left) elevation ensures that characteristic gaps between properties at upper levels are retained. 45 degree lines are shown in elevation from the front and rear and neither are breached by the proposed height and mass of the building.

- 8.9 The front building line is set between 2.2m to 3.5m further back than the existing building on the site, so the building would sit slightly further back in the site than neighbouring properties, in order to leave space for car parking on the front forecourt. This set back is appropriate when considered alongside the increase in mass compared to the existing building. The proposed building is not considered to be overbearing or cause any detrimental impacts on the streetscene.
- 8.10 The footprint of the building is larger than its neighbours and others on Reddown Road however the site is wider than neighbouring sites and the rear projection does not breach 45 degree lines from the closest rear windows of neighbouring properties in plan, indicating that the mass would not appear overbearing to neighbours nor impact on their outlook. The rear of the site is bounded by the railway and a grass verge, and the proposed building footprint leaves enough space for an appropriately sized communal garden at the rear, so the size of the footprint is considered to be appropriate for the site.
- 8.11 The design approach is a contemporary reinterpretation. The asymmetrical gable roof form including a catslide is contextually appropriate. The rear roof form features a hipped roof and a protruding gable. The proposed materials include multi red brickwork with black tiled roof. Brick detailing is incorporated on the front elevation to add interest to the façade. Use of aluminium window frames is supported, as are window reveals of at least 225mm in order to give depth and relief to the façade. Roof lights are flush. The front boundary treatment is a proposed to be a low brick wall, similar to the existing and other properties in the street. The proposed materials are high quality and robust and the design of the building is considered to be a positive contribution to the streetscene. Detailed materials information will be secured by condition.
- 8.12 In terms of site layout, 4 car parking spaces are proposed on the front forecourt, with permeable block paving as the paving material. This requires a fairly significant mass of hardstanding at the front but boundary planting is proposed at the front (behind the brick wall) to screen the parking from the street. The vehicle crossover is proposed to be moved to the centre of the site and a pedestrian entrance is proposed on the north side of the site providing step free access to the main front entrance. There is an additional stepped pedestrian access via the side of the building to the rear amenity space, and access to this space can also be gained internally via the lift and the lower ground floor of the building. Refuse and cycle stores are incorporated within the front of the ground floor of the building. There is one front facing balcony which is inset and is suitable in a contemporary reinterpretation approach to design. There is a lightwell on the left hand side of the building providing light to LGF unit 1. Whilst lightwells are not characteristic of the area it would not be visible from the street.
- 8.13 The proposal is considered to comply with policies SP4.1 and DM10 and London Plan policy D3 as it is of an appropriate height and mass and a suitably high design quality which responds appropriately to its context and contributes positively to the streetscene.

## Quality of Accommodation

- 8.14 The National Design Guide states that well designed homes should be functional, accessible and sustainable. They should provide internal environments and associated external spaces that support the health and well-being of their users and all who experience them. Homes should meet the needs of a diverse range of users, taking into factors such as ageing population and cultural differences. They should be adequate in size, fit for purpose and adaptable to the changing needs of their occupants over time. The London Plan policy D6 states that housing developments should be of a high quality and provide adequately sized rooms with comfortable and functional layouts. It sets out minimum Gross Internal Area (GIA) standards for new residential developments. All proposed units exceed the minimum space standards and internal layouts are sensible with hallways and adequate storage space.
- 8.15 All units, including those at lower ground floor level and roof level are dual aspect. Unit 1 on the LGF has rear and side facing windows plus a front lightwell which complies with the 25 degree line taken from 2m up and the front retaining wall is terraced so outlook would be acceptable. The single bedrooms on the second floor (units 8 and 9) are served only by rooflights however these are velux style so are openable to allow ventilation and limited outlook.
- 8.16 At ground and first floor, side facing windows are high level and all are secondary windows to living rooms/kitchens or are bathroom windows so they could be obscured without harming the quality of accommodation. This will be required by condition. It will not be necessary for the rooflights to be obscured, nor those at lower ground floor level.
- 8.17 Good design promotes quality of life for the occupants and users of buildings. This includes function (buildings should be easy to use) and also includes comfort, safety and security, amenity, privacy, accessibility and adaptability. Accessibility requirements have been considered in accordance with London Plan Policy D7. Unit 2 on the lower ground floor (1b2p) is a M4(3) wheelchair accessible unit. A lift is provided internally, providing step free access from ground floor to all units. All facilities of the site are accessible in a step free manner including the bins and bikes, communal amenity and play space. One wheelchair accessible parking space is also provided on site.
- 8.18 Policy DM10.4 of the Local Plan requires provision of high quality private amenity space at a minimum of 5sqm per 1-2 person unit and an extra 1sqm per extra occupant thereafter. The lower ground floor units have private patio/garden spaces; unit 2 (1b2p) has provision at the rear only and unit 1 (3b5p) has private space extending from the rear around the side of the building and into the front lightwell space. Appropriate boundary treatments (hedging) are proposed to provide separation and privacy from the communal space. Upper floors have inset balconies either at the front (unit 6) or the rear (all other units). All private amenity spaces comply with the space requirements.
- 8.19 The communal garden provides over 100sqm of shared amenity space for future occupiers, plus around 20sqm of children's play space and all areas are relatively flat so are usable. The garden area includes seating, grass, paths and a pergola.

Play equipment is also detailed and includes timber stepping stones, balancing beams and wobble board. The use of bespoke, natural play features is supported. Details are acceptable in accordance with Local Plan policies DM10.5 and DM10.4.

- 8.20 A Fire Statement has been provided in line with London Plan policy D12. This outlines the location of the fire service access point, and means of escape for all users, evacuation assembly point, internal fire safety systems and building construction techniques that would be used. This is acceptable.
- 8.21 The proposal would provide a good quality of accommodation for future occupiers in accordance with Local Plan Policies SP2 and DM10 and London Plan policies D6, D7 and D12.

### **Impacts on neighbouring residential amenity**

- 8.22 Policy DM10.6 of the Local Plan states that the Council will ensure proposals protect the amenity of occupiers of adjoining buildings and will not result in direct overlooking into their habitable rooms or private outdoor space and not result in significant loss of existing sunlight or daylight levels. The nearest residential properties are 102 Reddown Road to the south and 98 Reddown Road to the north. The railway line is at the rear of the garden so there are no amenity concerns in this direction.
- 8.23 It has already been mentioned that there is no breach of 45 degree lines in plan or elevation, and there is 8m separation between the buildings, so the building is not considered to have an overbearing impact on either neighbour or impact negatively on their outlook. As there is no breach of the 45 degree lines, a daylight and sunlight assessment has not been carried out.
- 8.24 Number 102 has 3 first floor windows facing the site, 2 of which are secondary bedroom windows which have their main windows facing front and back, and 1 is a bathroom window. It is notable that the building would be positioned closer to number 102 than the current property on the site, however the step down to single storey with pitched roof on the south (left) side at the front (2 storeys at the rear) and the aforementioned 8m separation between the 2 buildings ensures that the increased proximity would not be overbearing in any way. The impacts on the side facing windows are considered to be acceptable given that they are either secondary bedroom windows or non-habitable windows (bathroom) and that the separation distance is sufficient. The roof level velux window to bedroom 2 of unit 8 is openable but orientated upwards (as it is in the roof) and therefore does not allow direct overlooking to number 102.
- 8.25 Number 98 similarly has 2 first floor windows facing the site. These look to be secondary bedroom windows with the main windows facing the rear. Given the separation distance and the fact that they are secondary, impacts are considered to be acceptable. The roof level velux window to bedroom 2 of unit 9 is openable but orientated upwards (as it is in the roof) and therefore does not allow direct overlooking to number 98.

- 8.26 All flank windows on the proposed building at ground and first floor would be high level and obscured (by condition). The lower ground floor level windows and the rooflights do not need to be obscured. This will ensure there are no direct overlooking impacts to neighbours. The rear facing balconies at ground, first and roof level are inset to avoid any direct overlooking towards the gardens of numbers 98 and 102.
- 8.27 Noise from residential occupiers would not be out of the ordinary in this residential location so is not a cause for concern.
- 8.28 Any potential amenity impacts on neighbouring properties have been adequately mitigated so the proposal complies with Local Plan policy DM10.6.

### **Trees and landscaping**

- 8.29 Policy DM10.8 seeks to retain existing trees and vegetation and policy DM28 requires proposals to incorporate hard and soft landscaping. An Arboricultural report has been submitted assessing impacts on trees on and adjacent to the site. There are no prominent trees of arboricultural merit within the site boundaries.
- 8.30 There are a total of 4.5 trees/hedges proposed for removal. These include 4 x small ornamental specimens (T5, T6, T7 & T8 - all category C), plus the hedge on the northern boundary (H4 – category C) is proposed to be partially removed. There is no arboriculture objection to the proposed removals.
- 8.31 Following representations from a neighbour, the hedge in the rear garden on the southern boundary (H2) is to be retained. On the southern boundary the front hedge (H1) is proposed for retention. On the rear boundary of the site, in front of the railway line, H3 and T11 are proposed for retention, and the ecology report suggests infilling the gap at the end of H3 (in front of the railway, on the south western corner of the site) with native species, and adherence with the enhancement measures outlined in the ecology report will be required by condition.
- 8.32 On the northern boundary (with number 98), half of H4 is proposed to be retained and T9 in the garden of number 98 will be retained but experience a minor root incursion by the proposed building. All retained trees will be protected by protective fencing. A condition will be attached to ensure compliance with the arboricultural method statement and tree protection plan.
- 8.33 The proposed landscaping is limited in detail currently. 1.8m close board fences are proposed on the side and rear boundaries. New planting is proposed on the southern boundary, and hedging is proposed to provide defensible planting between the private and shared amenity spaces at the rear, and between the car parking area and the habitable windows at the front. Hedging is proposed at the front of the site however we will ensure, via condition, that this is a double staggered, post and wire hedge, minimum height 1-1.2m (which may step down to visibility splays), to ensure the parking is adequately screened. A condition will be attached to ensure sufficient replacement tree planting is proposed (4 trees minimum to replace those removed) along with further details of the landscaping



proposal. The proposal is considered, subject to conditions, to comply with Local Plan policy DM10.8 and DM28.

## **Ecology**

- 8.34 Local Plan policy DM27 seeks to protect and enhance biodiversity in the borough. An ecological impact assessment has been undertaken. The assessment identifies that the proposal is unlikely to have any direct or indirect impact on the nearby Farthing Downs and Happy Valley SSSI or any nearby SINCs. The site itself was found to have negligible potential for notable invertebrates such as the stag beetle. Neighbouring ponds in number 98 and 102 were tested for great crested newts but none were found so the site is concluded to be of negligible importance for great crested newts. The site provides low suitability for common toads and mitigation is suggested. A slow worm was identified in the garden of number 98 and the railway is likely to provide a commuting corridor for reptiles so the site is identified as having low potential for reptiles and mitigation is proposed.
- 8.35 The site holds high potential for nesting birds in the hedgerows and trees, but negligible potential for significant bird species and assemblages; mitigation measures for nesting birds are proposed. No badgers were identified in the survey but precautionary measures are proposed. The trees on the site were found to provide negligible suitability for roosting bats. 2 nocturnal bat surveys of the building were undertaken and no evidence of roosting bats was recorded during the surveys so the building is concluded to be of negligible importance for roosting bats. The railway corridor provides potential suitable habitat for dormice, but the site itself does not. The rear hedgerow would be retained. Recommendations to maintain connectivity for hedgehogs are proposed.
- 8.36 Mitigation measures to protect biodiversity include retention of boundary hedgerows where possible, a precautionary approach to site clearance to protect reptiles and toads, a check of potential bird nesting habitats by an ecologist prior to site clearance, installation of a bat box on the northern elevation of the new building, sensitive lighting to protect commuting bats, and hedgehog links below the new garden fence. A series of biodiversity enhancements for the site are also proposed including provision of new/replacement hedgerows, bird and bat boxes, creation of dead wood habitats, avoidance of slug pellets/pesticides, creation of green/brown roofs and walls (i.e. on bike/bin stores).
- 8.37 The Ecology Assessment and the mitigation and enhancement measures reposed have been reviewed by the Council's Ecology advisor and no objection has been raised subject to conditions for a Construction Environment Management Plan (Biodiversity) to detail the proposed mitigation measures and a Biodiversity Enhancement Plan.

## **Access, Parking and Highway Safety**

### Accessibility and access arrangements

- 8.38 The site has a Public Transport Accessibility Level (PTAL) of 1b which indicates very poor access to public transport. It is however within 750m walking distance from Coulsdon South train station and is located within a CPZ which restricts parking between the hours of 11am and 12pm on weekdays.
- 8.39 The site has an existing vehicle crossover on the north side of the site, close to number 98. The proposal involves relocating the crossover to the centre of the site to enable provision of 4 car parking spaces on the front forecourt. The crossover would be moved 4.5m closer to the junction with Westwood Road. Croydon's vehicle crossover guidance states that new crossovers must not be constructed within 10m of a road junction in order to avoid conflicting traffic movements, and the proposed (and existing crossover) would be within 10m of the junction with Westwood Road. However as only 4 car parking spaces are proposed (a net increase of 2) there would not be a significant increase of vehicle movements into and out of the site or a significant intensification of use of the crossover. In addition, the positioning of the crossover opposite (rather than next to) the junction would reduce the possibility of conflicting signalling and traffic movements and therefore the shift in the position of the crossover is not considered to pose a serious threat to highway safety. The appropriate pedestrian and vehicle sightlines are shown on the plans. The proposed width of crossover complies with highways guidance. The new crossover and reinstatement of the old crossover would be agreed as part of a S278 Agreement.
- 8.40 A separate 1.2m wide pedestrian path is proposed on the north side of the site providing step-free access to the main front entrance. The position of this path on the north side is convenient for pedestrians walking down from the station at the end of the road.

#### Car parking

- 8.41 London Plan policy T6.1 would permit up to 1.5 spaces per 3+ bed unit and 1 space per 1-2 bed unit which equates to a maximum of 10.5 (11) spaces. Maximum car parking provision is not supported because a balance needs to be struck between encouraging sustainable modes of transport on the one hand and ensuring highway safety and managing on-street parking on the other. In the interests of sustainable development and climate concerns, new developments should not over-provide car parking. Furthermore, given the location of the site opposite the junction, intensified use of the crossover should be kept to a minimum.
- 8.42 4 car parking spaces are proposed on the front forecourt for the 9 flats. The site is located within a CPZ which restricts parking between 11am-12pm on weekdays. The Council would remove the ability of new residents to apply for parking permits to park in the street, which would severely limit their ability to own cars (as they would not be able to park in the area). Therefore, the proposal to provide just 4 parking spaces is considered appropriate. 3 of the 4 parking spaces would be secured for the 3 family sized units as part of the S106 agreement.
- 8.43 The tracking diagrams confirm that manoeuvring into and out of the parking spaces can be achieved safely. One of the parking spaces is shown as a disabled

bay on the plan, located closest to the front entrance. Conditions would be attached to ensure that 20% active and 80% passive electric vehicle charging points are provided in line with policy DM30 and London Plan policy T6.1.

- 8.44 In addition to the removal of parking permits, a contribution of £13,500 will be secured via S106 agreement to contribute towards sustainable transport initiatives in the local area in line with Local Plan policies SP8.12 and SP8.13. In addition, every residential unit will be provided with a minimum 3-year membership to a local car club scheme upon first occupation of the unit.
- 8.45 A condition will be attached to require submission of a Construction Logistics Plan (CLP) and a condition survey of the surrounding footways and carriageway prior to commencement of works on site.

#### Cycle parking

- 8.46 Policy DM30 and London Plan policy T5 would require provision of a total of 17 cycle parking spaces for residents plus 2 visitor parking spaces. Cycle parking is proposed in various locations; the main cycle store is on the ground floor of the building, accessed from the front forecourt with space for 11 bikes. An additional store is provided in the rear garden with 2 Sheffield stands (space for 4 bikes) and the lower ground floor units have private bike stores with space for 2 bikes each in their rear gardens. The rear cycle store can be accessed via the path on the side of the building via bike ramps to negotiate the steps. This equates to a total of 19 spaces which is acceptable.
- 8.47 Visitor parking spaces are not shown on plan but these could be positioned somewhere on the front forecourt and they will be required by condition.

#### Waste / Recycling Facilities

- 8.48 Policy DM13 requires the design of refuse and recycling facilities to be treated as an integral element of the overall design. The bin store is located internally within the ground floor of the building and is of an appropriate size to accommodate the required bins (1x1280 litre recycling bin, 1x1100 litre waste bin and 1x240 litre food bin) and in an appropriate location for collection by operatives. Details are acceptable and a condition will be attached to ensure compliance with the approved details.

### **Flood Risk and Energy Efficiency**

#### Flood risk

- 8.49 The site is within flood zone 1, at low risk of surface water flooding and at low to medium risk of groundwater emergence. Representations have raised concern about sewage flooding in the area. A basic flood risk assessment has been submitted stating that appropriate SUDS would be used on site to ensure flood risk is not increased elsewhere. The applicant has confirmed that the ground conditions are Lewes Nodular Chalk and that infiltration is viable, so the primary SUDS for the site would be soakaways designed to BRE 365 standards following site specific testing. The soakaways would be supplemented by water butts to

reduce potable water demand and permeable paving to all areas of hardstanding. Full surface water drainage details will be required by condition in accordance with Local Plan policy DM25 and London Plan policy SI13. Liaison with Thames Water will also be required to ensure confirmation of adequate sewage capacity.

### Energy efficiency

- 8.50 In order to ensure that the proposed development will be constructed to high standards of sustainable design in accordance with Local Plan policy SP6, a condition will be attached requiring the proposed development to both achieve the national technical standard for energy efficiency in new homes (2015) which requires a minimum of 19% CO2 reduction beyond the Building Regulations Part L (2013), and meet a minimum water efficiency standard of 110 litres/person/day as set out in Building Regulations Part G.

### **Conclusion**

- 8.51 The provision of 9 flats in this location is acceptable in principle. The proposed design is considered to be an enhancement to the streetscene, and the massing and site layout is considered to be appropriate. The quality of accommodation is acceptable, with good levels of accessibility around the site and the building. 4 car parking spaces is acceptable given the location of the site within the CPZ and opposite the junction. Impacts on trees and ecology are acceptable. Landscaping and SUDS details will be required by condition.
- 8.52 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.

### Other matters

- 8.53 The development would be liable for a charge under the Community Infrastructure Levy (CIL).
- 8.54 All other planning considerations including equalities have been taken into account.