

1 APPLICATION DETAILS

Ref: 23/00010/FUL
 Location: 30 Riddlesdown Avenue, Purley, CR8 1JG
 Ward: Purley Oaks and Riddlesdown
 Description: Demolition of existing garage and shed fronting Riddlesdown Road, alterations to land levels, erection of dwellinghouse (over two floors) and associated parking, cycle storage and refuse storage
 Drawing Nos: Location plan, SL/22 101, SL/22 102A, SL/22 103, SL/22 104A, SL/22 109, SL/22 200, SL/22 201, SL/22 202A, SL/22 203A, SL/22 204, SL/22 205, SL/22 206, SL/22 207, SL/22 208, Planning Fire Safety Strategy, SL/22 210, site plan, 3040-001, Flood Risk Assessment, Preliminary Ecological Appraisal
 Applicant: Mr. Simon Lewis
 Case Officer: Hayley Crabb

Vehicle and Cycle Parking (London Plan Standards)	
PTAL: 1A	
Car Parking maximum standard	Proposed
1.5 spaces per dwelling	2
Cycle Storage minimum	Proposed
2 (per dwelling)	3

1.1 This application is being reported to committee because:

- The application has been referred by the Riddlesdown Residents Association and ward councillor Cllr Alasdair Stewart made representations in accordance with the Committee Consideration Criteria and requested committee consideration.

2 RECOMMENDATION

2.1 That the Committee resolve to GRANT planning permission subject to the completion of a S.106 agreement to secure the following heads of terms:

- (a) A financial contribution of £10,000 towards road improvements
- (b) And any other planning obligations considered necessary

- 2.2 That the Director of Planning and Sustainable Regeneration is delegated authority to negotiate the legal agreement indicated above.
- 2.3 That the Director of Planning and Sustainable Regeneration is 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) Carried out in accordance with the approved drawings

Pre-commencement

- 3) Construction Logistics Plan to include a conditions survey of the public highway
- 4) Ecology condition (Construction Environmental Management Plan for Biodiversity)
- 5) Sustainable Drainage (SUDs)

Prior to above ground floor slab level

- 6) Materials including details of biodiverse green roof
- 7) Refuse storage
- 8) Landscaping scheme (including SUDs details/details of green roof/boundary treatment/retaining walls/ permeable paving to car parking area)
- 9) Ecology condition (Biodiversity Enhancement Layout)

Pre-occupation

- 10) Ecology condition (Wildlife sensitive lighting design scheme)

Prior to occupation

- 11) Visibility splays shall be provided as specified

Compliance

- 12) No windows in the side elevations other than as specified/obscure glazed
- 13) Remove Permitted Development for the new house
- 14) Car park layout
- 15) Fire Safety (report and plan)
- 16) Ecology condition (in accordance with ecological appraisal recommendations)
- 17) Energy efficiency requirements
- 18) Water efficiency requirements
- 19) Accessible design: M4(2) compliance.
- 20) Cycle store provision
- 21) Electric Vehicle Chargers
- 22) Any other planning condition(s) considered necessary by the Director of Planning and Sustainable Regeneration

Informatives

- 1) Community Infrastructure Levy
- 2) S106
- 3) Code of practise for Construction Sites
- 4) Party Wall Act
- 5) Thames Water
- 6) Highways
- 7) Any other informative(s) considered necessary by the Director of Planning and Sustainable Regeneration

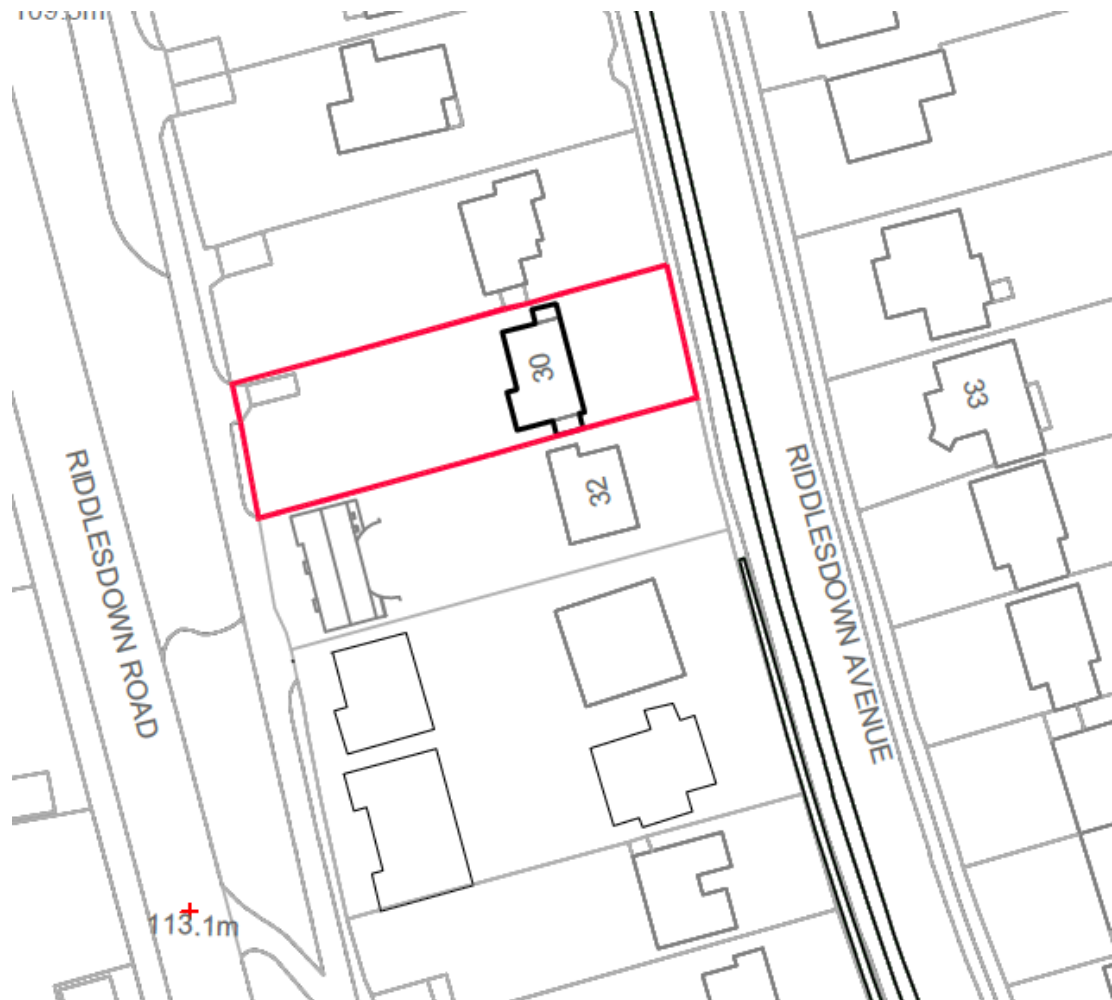
2.2 That the Committee confirms that adequate provision has been made, by the imposition of conditions, for the preservation or planting of trees as required by Section 197 of the Town and Country Planning Act 1990.

3 PROPOSAL AND LOCATION DETAILS

Proposal

3.1 The proposal comprises the following:

- Erection of a single/two storey detached 3-bedroom (4 person) dwelling;
- Refuse and cycle provision;
- 2 parking spaces would be provided (one for the host dwelling and one for the proposed dwelling); and
- Side access would be maintained from Riddlesdown Road to the host dwelling



Site Location Plan

Site and Surroundings

- 3.2 The application site consists of a detached two storey dwelling which faces Riddlesdown Avenue. To the rear of the site are a detached garage and shed which front onto Riddlesdown Road, which would be replaced by the new dwelling. The existing garage is served by an access drive to the rear of the site, which also serves the other dwellings on this side of Riddlesdown Road. The site immediately to the south has a house fronting Riddlesdown Avenue, and another fronting Riddlesdown Road, and the proposal would create a similar arrangement.
- 3.3 The area is residential in character consisting of predominately detached dwellings of varying sizes and styles set within varying plot sizes.
- 3.4 A number of detached single/two dwellings have been constructed in the rear gardens of properties in Riddlesdown Avenue, fronting Riddlesdown Road. As noted above, No. 32 Riddlesdown Avenue the adjoining site has also erected a dwelling fronting Riddlesdown Road (No. 79N Riddlesdown Road).

Planning Designations and Constraints

3.5 The site is subject to the following formal planning constraints and designations:

- PTAL: 1a – Very poor accessibility to public transport links
- Archaeological Priority Area (Tier II – London to Brighton)
- No Tree Preservation Order on the site
- Riddlesdown Road is a Local Distributor Road
- The site is identified as at very low risk of surface water flooding. (1 in 1000 year) close proximity to ground water flooding.

Planning History

30 Riddlesdown Road (application site)

3.6 05/01926/P – Erection of side and rear extension to garage – Planning Permission granted on 06.07.2005.

3.7 01/00077/P – Erection of single storey side extension – Planning Permission granted on 07.03.2001.

32 Riddlesdown Avenue, Purley

3.8 20/02296/HSE - Erection of a two-storey side and rear extension; extension to existing patio at rear; insertion of a ground floor side window in to the existing dwelling and alterations to the front elevation – Planning Permission granted on 24.07.2020.

3.9 18/02858/DISC - Discharge of conditions 2, 3, 7 and 12 attached to planning permission 16/04621/FUL for the demolition of existing garage to the rear and erection of 3 bedroom detached house with part pitched/part flat roof (fronting Riddlesdown Road) – Approved 07.09.2018.

3.10 16/04623/FUL - Demolition of existing garage to the rear. Erection of 3 bedroom detached house with curved sedum roof (fronting Riddlesdown Road) – Planning Permission granted on 23.06.2017.

3.11 16/04621/FUL - Demolition of existing garage to the rear and erection of 3 bedroom detached house with part pitched/part flat roof (fronting Riddlesdown Road) – Planning Permission granted on 23.06.2017.

4 SUMMARY OF KEY REASONS FOR RECOMMENDATION

4.1 The application is recommended for approval because:

- The principle of residential development on the site is acceptable;
- The principle of backland development is acceptable given the residential character of the area;
- The design and appearance of the development is appropriate for the site;
- There would be no undue harm to the residential amenities of adjoining occupiers;
- The living standards of future occupiers would be acceptable and compliant with the Nationally Described Space Standards and the London Plan;
- The proposed development would not cause unacceptable harm to the amenities of neighbouring residential occupiers;
- Subject to the imposition of conditions and the recommended s.106 obligation, the proposed development would not have an adverse impact on the operation of the highway:
- Subject to conditions, the proposal would not have an adverse impact on Flooding;
- Landscaping can be controlled by conditions; and
- Sustainability aspects can be controlled by conditions.

4.2 The following sections of this report summarise the officer assessment and the reason for the recommendation.

5 CONSULTATION RESPONSE

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

5.2 The following were consulted regarding the application:

Historic England (Statutory Consultee)

5.3 Historic England were consulted due to the site being within an Archaeological Priority Area – Tier II (London to Brighton Roman Road). Historic England have advised, the proposal is unlikely to have a significant effect on heritage assets of archaeological interest and have advised that no further assessment or conditions necessary.

6 LOCAL REPRESENTATION

6.1 A total of 5 neighbouring properties were notified about the application and invited to comment. Site Notices were also erected. The number of representations received from neighbours, local groups etc in response to notification and publicity of the application were as follows:

No of individual responses: 7 Objecting: 7 Supporting: 0 Comment: 0

6.2 It should be noted that neighbouring properties/interested parties were consulted on amended/additional information received and amended drawing site notices were erected. No further responses were received from neighbouring properties/interested parties apart from Riddlesdown Residents' Association. See paragraph 6.8 below and Ward Councillor Alasdair Stewart, see paragraph 6.10 below.

6.3 The following local groups/societies made representations:

- Riddlesdown Residents' Association

6.4 The following Councillor made representations:

- Councillor Alasdair Stewart

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

Objection	Officer comment
Overdevelopment/character	
Overdevelopment/character/obtrusive by design	Addressed in Section 8.9-8.15 of this report
Neighbouring amenity	
Residential amenity/overshadowing/loss of light/loss of privacy/overlooking/noise	Addressed in Section 8.21-8.26 of this report
Transport and Highways impacts	
Quality of access road/no parking for no. 30.	Addressed in Section 8.33-8.44 of this report.
Flooding	
Flooding	Addressed in Section 8.47-8.50 of this report. Details can be secured via condition.
Other	
Construction/disruption	This is part of the build process. Construction Logistics addressed in Section 8.50 of this report. A pre-commencement condition would be attached for a Construction Logistics

	Plan to be submitted and an informative placed as in respect of the Councils "Code of Practice on the Control of Noise and Pollution from Construction Sites" which should be adhered to.
Infrastructure	Addressed in Section 8.55 of this report. The scheme would be CIL liable, with a payment which contributes to meeting the need for physical and social infrastructure, including educational and healthcare facilities. A s.106 obligation is also proposed towards transport infrastructure, which would be £10,000 and higher than the amount usually required, in order to contribute to the resurfacing of the access road outside the site.

6.6 The following additional issues were raised in representations that officers have considered, and would like to make the Committee aware of, noting that they are not material to the determination of the application:

- Foundations, damage are not a planning consideration and boundary treatment/fencing is a matter between third parties.

6.7 The Riddlesdown Residents' Association raised an objection (and referral in the event planning permission recommended for approval) in relation to the proposed development and raised the following points as their main concerns:

- No pre-application submitted (Officer comment: Whilst this is recommended, there is no requirement for a pre-application to be submitted);
- Overdevelopment/cramped form of development/out of keeping
- Lack of parking/Riddlesdown Avenue/no Transport Statement or Lambeth Methodology/consented schemes/dropped kerb advice/cycle and refuse storage; (Officer comment: A Parking Survey has been submitted for assessment)
- Access road fronting Riddlesdown Road – Improvements needed (Officer comment: a £10,000 contribution to this is proposed to be secured by s.106 agreement)
- Landscaping details (Officer comment: Details can be secured via condition)
- Surface Water/Flood Risk Assessment (Officer comment: Details can be secured via condition)

- Construction Logistics Plan (Officer comment: It is considered the details can be secured via a suitably worded pre-commencement condition given the proposal is for one unit)

6.8 Following the re-consultation process, The Riddlesdown Resident's Association uphold their objection and state that the concerns previously raised have generally not been addressed:

- Planning Statement – No change to points previously raised
- Design and Character: Whilst the applicant has submitted new drawings to show the proposed house in relation to the adjoining new dwellings still considered to be an overdevelopment of the site
- PTAL rating, vehicle parking and highway safety: No change to points raised. The swept path drawings do not take into account the grass bank on one side of the access road and does not show overlapping onto the grass verge/bank. Parking spaces are too tight and there are insufficient parking spaces for two dwellings (host and proposed) in a PTAL 1a area.
- Access road/service road (Officer comment: The applicant has confirmed agreement to pay a financial contribution towards road improvements)
- Surface water disposal and flood risk Assessment/refuse/cycle storage and landscaping (Officer comments: (Officer comment: Details can be secured via condition)

6.9 Councillor Alasdair Stewart made the following representations:

- Cramped and substandard
- Out of character (design and character)
- Insufficient parking/no disabled space

6.10 Following the re-consultation process, Councillor Alasdair Stewart has upheld his objection and referral for the following reasons:

"I believe my reasoning (objections and referral) from the original application still stands and applies:

While I am in favour of building additional homes, and supportive of sensible 'back garden developments', this application is cramped and sub-standard. The design and character is not appropriate and does not comply with DM 10. Insufficient parking is proposed, with no option of a disabled space should one be required (Local Policies SP8.1, DM29, DM30, and London Plan T6).

I am aware RRA have shared concerns re flooding and surface water in their own objection, and I share those same concerns".

Officer comment: Points covered in the report below where relevant.

7 RELEVANT PLANNING POLICIES AND GUIDANCE

Development Plan

7.1 The Council's adopted Development Plan consists of the London Plan (2021), the Croydon Local Plan (2018) and the South London Waste Plan (2022). Although not an exhaustive list, the policies which are most relevant to the application are:

London Plan (2021)

- D1 London's form, character and capacity growth
- D3 Optimising site capacity through the design led approach
- D4 Delivering Good Design
- D5 Inclusive Design
- D7 Accessible housing
- D12 Fire Safety
- D14 Noise
- G5 Urban Greening
- G6 Biodiversity and access to nature
- G7 Trees and Woodlands
- HC1 Heritage
- SI 2 Minimising Greenhouse Gas Emissions
- SI 8 Waste Capacity and Net Waste Self-Sufficiency
- SI 12 Flood Risk Management
- SI 13 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
- SP4 Urban Design and Local Character
- SP6 Environment and Climate Change
- DM1 Housing Choice for Sustainable Communities
- DM10 Design and Character
- DM13 Refuse and Recycling
- DM16 Promoting Healthy Communities
- DM18 Archaeology
- DM19 Promoting and Protecting Healthy Communities
- DM23 Development and Construction
- DM25 Sustainable Drainage Systems and Reducing Flood Risk
- DM27 Biodiversity
- DM28 Trees

- DM29 Promoting Sustainable Travel and Reducing Congestion
- DM30 Car and cycle parking.

7.2 The Development Plan should be read as a whole, and where policies conflict with each other, the conflict must be resolved in favour of the policy contained in the last document to be adopted, approved or published as part of the development plan, (in accordance with s38(5) of the Planning and Compulsory Purchase Act 2004).

Planning Guidance

National Planning Policy Framework (NPPF)

7.3 Government Guidance is contained in the NPPF, updated on 20 July 2021, and accompanied by the online Planning Practice Guidance (PPG). The NPPF sets out a presumption in favour of sustainable development, requiring that development which accords with an up-to-date local plan should be approved without delay. The NPPF identifies a number of key issues for the delivery of sustainable development, those most relevant to this case are:

- Delivering a Sufficient Supply of Homes
- Promoting Sustainable Transport
- Achieving Well Designed Places

SPDs and SPGs

7.4 There are also several Supplementary Planning Documents (SPD) and Supplementary Planning Guidance (SPG) documents which are material considerations. Although not an exhaustive list, the most relevant to the application are:

- London Housing SPG (March 2016)
- Technical Housing Standards: Nationally Described Space Standard (2015)
- National Design Guide (2021)
- Housing Design Standards LPG (2023)

8 MATERIAL PLANNING CONSIDERATIONS

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

1. Principle of development
2. Design and impact on character of the area
3. Quality of residential accommodation
4. Impact on neighbouring residential amenity
5. Trees, landscaping and biodiversity

6. Access, parking and highway impacts
7. Fire Safety
8. Flood risk and energy efficiency
9. Other Planning Issues
10. Conclusions

Principle of development

- 8.2 The Croydon Local Plan (2018) sets out a presumption in favour of new homes, with a housing target of 32,890 homes over a 20-year period from 2016-2036 (1,645 homes per year). The London Plan requires 20,790 of those homes to be delivered within a shorter 10-year period (2019-2029), resulting in a higher annual target of 2,079 homes per year.
- 8.3 The Croydon Local Plan also sets out a target for development on Windfall sites of 10,060 homes (approximately 503 per year). The London Plan requires 6,410 net completions on small sites (below 0.25 hectares in size) over 10 years, with small-sites housing target of 641 per year.
- 8.4 Policy H1 (Increasing housing supply) and Policy H2 (Small sites) of the London Plan (2021) states:
- Boroughs should optimise the potential for housing delivery on all sites (H1)
 - Councils should pro-actively support small site development to significantly increase the contribution that small sites make towards housing delivery (H2).
 - Councils should support housebuilders (H2).
- 8.5 Policy SP2 of the Croydon Local Plan (2018) sets out how housing will be delivered across the Borough. DM11 recognises the importance of the delivery of new housing and sets out key objectives for development within the borough. Policy SP2.7 of the Croydon Local Plan (2018) sets a strategic target of 30% of all new homes up to 2036 to have three beds or more.
- 8.6 The 2023 Authority Monitoring report identifies that only 17% of new homes currently have 3+ bedrooms, so there is pressure to increase this. Also Policy DM1.2 of the Croydon Local Plan (2018) seeks to prevent the loss of small family homes by restricting the net loss of three bed units and the loss of units that have a floor area of less than 130sq.m.
- 8.7 The proposal would not result in the loss of a dwelling and the proposed dwelling would provide 3 bedrooms. The proposed development would therefore accord with policy and would boost the supply of 3+ bedroom homes.
- 8.8 The existing use of the site is residential (C3) and as such the principle of redeveloping the site for residential purposes is acceptable in land use terms. Given

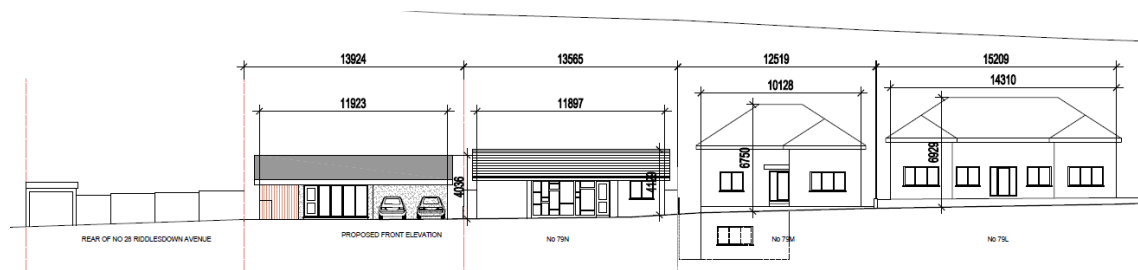
the above the principle of intensifying the site is acceptable subject to further consideration below.

Demolition / Loss of existing garden land

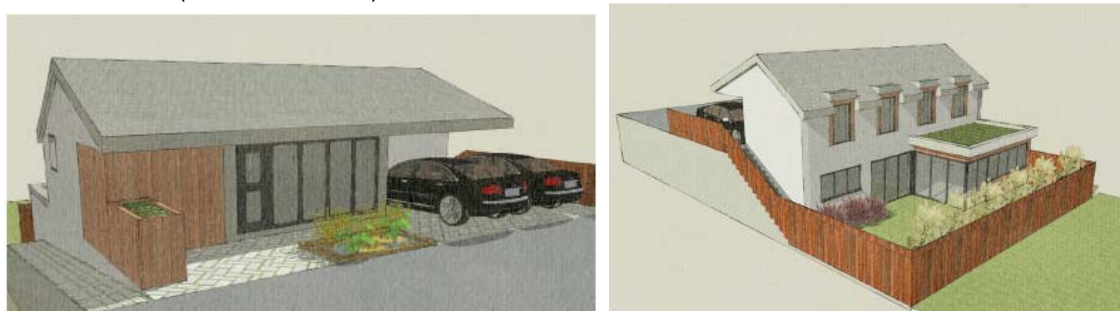
The proposed development would result in the loss of some garden space, an existing garage and parking space. The garage falls below modern standards for vehicle parking, but does provide useful ancillary storage space for the existing house. Local Plan Policy DM1 requires development on backland sites to retain a garden of at least 200sqm or 50% (whichever is smaller); and a length of at least 10m. The proposal would comply with this requirement and therefore there is no conflict with the Local Plan in terms of land use. The proposal would re-provide 2 parking spaces therefore there would be no net loss of parking; the parking arrangements and impacts are considered later in this report. The existing house benefits from “permitted development” rights; the suggested planning conditions would not remove these rights so if external storage was required by the occupants of the existing house, they would still be able to erect a shed or similar structure in their garden, with access from both the front and rear similar to the current arrangement. Overall, there is no conflict with the Local Plan arising from the proposed demolition and loss of existing garden land.

Design and impact on character of the area

- 8.9 Policy SP4.1 indicates that the Council will require all new development to contribute to enhancing a sense of place and improving the character of the area. Policies SP4.1 and SP4.2 of also require development to be of a high quality which respects and enhances local character. Policy DM10 of the Croydon Local Plan (2018) requires the siting, layout and form of new development to respect the character and appearance of existing areas and Policy DM17 requires development to avoid detrimental impact on the quality of the view. Policies D2, D3, D4 and D5 of the London Plan (2021) are also of relevance.
- 8.10 It is proposed to demolish the existing garage and shed fronting Riddlesdown Road. The proposal would see the erection of a single/two storey dwelling to the north of a number of other properties which have been erected along this stretch of road fronting Riddlesdown Road. See below which includes the proposed dwelling and illustrative CGIs of the development.



Street scene (Plan: SL/22 208)

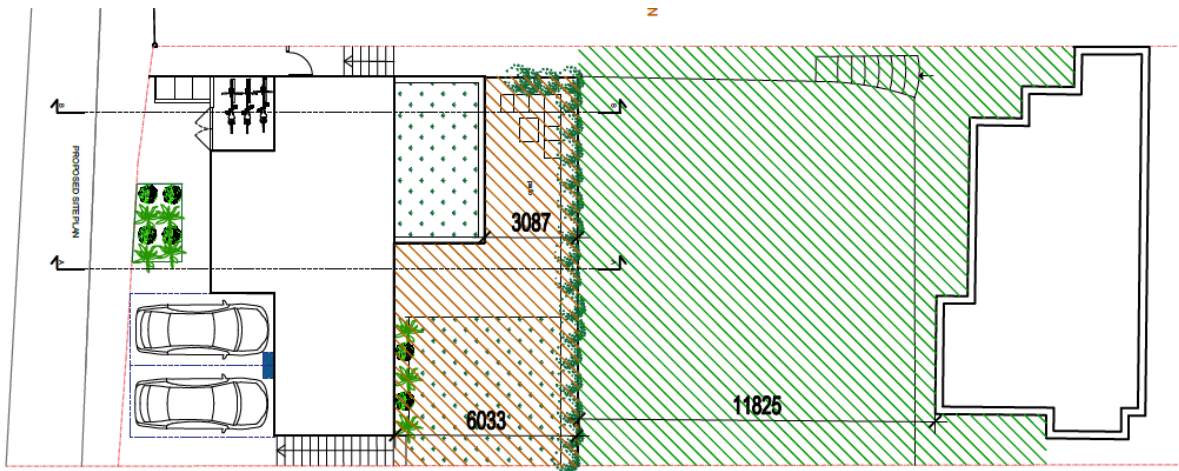


CGI's within Planning Statement (Illustrative purposes only)

8.11 The garden of no. 32 Riddlesdown Avenue (next door) has already been subdivided and a single/two storey dwelling erected fronting Riddlesdown Road (No. 79N Riddlesdown Road). (See plan below from application 16/04621/FUL). The proposed dwelling would have a similar width and depth (two storey element) to no. 79N. It would provide a rear access path from Riddlesdown Road to the garden of the host (existing) dwelling, as well as side access to the garden of the proposed house. Concern has been raised regarding the plot size. It should be noted that no. 79N has a larger curtilage/depth of garden to that proposed. (See drawing UC/200C from application 16/04621/FUL below). Whilst the plot would have a smaller curtilage to no. 79N, it is considered that given the plot sizes in the vicinity of the site and that the size of the dwelling would be comparable to that at no. 79N The proposal would not appear overly cramped for the plot or result in the overdevelopment of the site, and would be sufficiently in keeping with the character of the area. As explained above, Local Plan Policy DM10 requires that, in the case of development in the grounds of an existing building which is retained, a minimum length of 10m and no less than half or 200m² (whichever is the smaller) of the existing garden area is retained for the host property, after the subdivision of the garden. The existing garden area is 372sqm (excluding the garage and driveway, as these are not usually considered part of the garden area). The proposal would retain a garden of 11.8m long, and 186sqm (50% of the existing garden) for the existing house.



Drawing UC/200C from application 16/04621/FUL for house built at no. 32.



Drawing SL/22 103 (Received 25th July 2023) for proposed house at no. 30.

8.12 The proposed dwelling would have a similar width and depth (two storey element) to no. 79N, although would be of a different design. It should be noted there are properties in close proximity which have a larger massing to that proposed. The proposed development would appear as a single storey bungalow from Riddlesdown Road frontage as does 79N and single/two storey at the rear due to the differing land levels at the rear. The dwelling would be sunk into the site reducing its visual impact. The development would incorporate dormer features at the rear. In terms of materials, it is proposed to provide a mix of cedar cladding and render. The main roof would have slate tiles and the proposed single storey element at the

rear would incorporate a green roof. The windows would be grey (aluminium). Whilst most properties on the opposite side of Riddlesdown Road are traditional in appearance, the form and design of properties on this side of the road are generally simply designed bungalows with white rendered walls and dark roof tiles; which the proposal would reflect. Whilst the existing homes on this side of the road do not include dormer features at the rear, there are several rear elevation dormers in the wider area (usually permitted development). The overall roof form and massing would be smaller than most of those within the row of houses and therefore it is considered that in this context the design of the roof, including rear dormers, is acceptable. In order to ensure a high-quality development is provided, it is recommended for details of the materials/details of the green roof at the rear to be secured via an appropriately worded condition to ensure a high quality development is brought forward.

- 8.13 The proposed house would be set back from the frontage with Riddlesdown Road by approximately 2.1m (at its closest point) to 5.2m and aligned with the front elevations of the adjacent homes. This would generally accord with the existing building line along this side of the road (see block plan below) and would be set further back than the existing garage. Car parking is proposed to the front of the dwelling, with an off street parking space for the host dwelling as well as an off street parking space for the proposed dwelling similar to the parking for other dwellings along this stretch. The appearance of this would be similar to the adjacent house, and as a result is considered to be acceptable.



Block Plan (Plan: SL/22 102A)

8.14 An area of hardstanding on the frontage would be given over to two off street parking spaces, which is consistent with other examples in the area with an area for soft landscaping provided in the form of a flower bed which would soften the appearance of the development in the street scene. A condition is recommended to ensure that the frontage is of a suitably permeable material and a landscaping scheme would also be required if approval were to be granted, which would include planting on the frontage. With conditions this element of the proposal is considered acceptable.

The site slopes relatively steeply, and plans have been submitted showing the topography (see block plan above). The new building would be set-in from the boundaries on either side meaning that any excavation for foundations, retaining walls etc. would be pulled in from the boundaries of the site. Whilst not strictly a planning matter, details of the retaining wall for the proposed lower ground floor have been provided to offer some confidence that the wall thicknesses shown on the plans are correct and have been properly considered. Any “hard” structure, e.g., new paths, steps, and boundary treatments are to be secured by the recommended landscaping plan condition.

8.15 In light of the above, officers are of the opinion that the proposed development would not result in the overdevelopment of the site and would comply with the objectives of the above policies in terms of visual amenity and character of the area.

Quality of residential accommodation

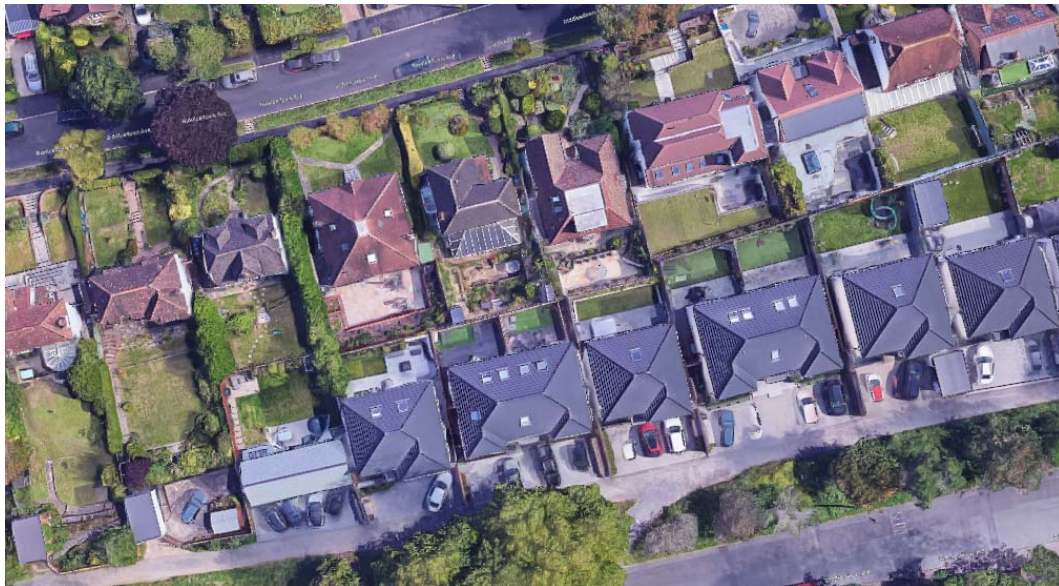
- 8.16 Policies SP2.8 of the Local Plan, the Housing Design Standards LPG and D6 of the London Plan requires new homes to be of high quality and achieve minimum standards in unit and room sizes, and ceiling heights.
- 8.17 It is proposed to provide a 3 bedroom dwelling over two floors; one floor at ground level, and another floor at lower ground level (at the rear) owing to the steep slope of the land, meaning that at the rear of the property the lower ground floor would be at ground level. The application drawings show the proposal would provide a 3 bedroom (6 person) dwelling, however two of the bedrooms are under 11.5m² and therefore not large enough to be classified as a double occupancy room and therefore based on the floor areas the proposal would provide a 3 bedroom (4 person) dwelling.
- 8.18 The Technical Housing Standards requires a 3 bedroom (4 persons) unit over 2 floors to have a minimum gross internal floor area (GIA) of 84m² with 2.5m² built in storage. The dwelling would exceed the required space standards. It should also be noted that the proposed dwelling would also exceed the required space standards for a 3-bedroom (6 person) unit (minimum gross internal floor area (GIA) of 102m² with 2.5m² built in storage) having an internal floor area of 116m². It is also considered the proposed dwelling would provide an adequate level of accommodation for future occupiers in terms of layout and outlook and an adequate level of storage would be provided.
- 8.19 The Local Plan requires a minimum 7sqm of private amenity space that is of high quality design, and enhances and respects the local character; provides functional private amenity space.
- 8.20 A private outdoor garden would be provided of 63sqm, which would significantly exceed the minimum standard, and in terms of character would not be that dissimilar to the gardens of other properties along this stretch.
- 8.21 In terms of accessibility, the agent has confirmed that level access to the proposed dwelling would be provided from the street. It is also considered there would be sufficient space to provide an internal lift to the lower ground floor if required, with step-free access to the patio. The London Plan requires new homes to be M4(2) (accessible and adaptable) or M4(3) compliant (wheelchair user) where feasible; a planning condition is recommended to secure at least M4(2) compliance.

Impact on neighbouring residential amenity

- 8.22 Policy D3 (Optimising density through the design-led approach) of the London Plan states developments should secure safe and inclusive environments, secure outlook, privacy and amenity, provide green space and achieve outdoor /indoor environments that are inviting for people to use. Policy DM10 of the Croydon Local

Plan requires the Council to have regard to the privacy and amenity of adjoining occupiers. Policies SP4.1 and SP4.2 seek to respect and enhance character, to create sustainable communities and enhance social cohesion and well-being. The homes most impacted by the development would be no. 28, the host dwelling, 32 Riddlesdown Avenue and 79N Riddlesdown Road.

- 8.23 There would be separation distance from the host dwelling to the first floor of the proposed dwelling of approximately 18m, which is supported by paragraphs 6.80-6.81 of the Local Plan. A 1.8m wooden fence is proposed to separate the plots with planting along the back of the fence, meaning that although there is a slope to the land, the separation distance between ground floor windows would be obscured by the fence. The lower ground floor of the new building to the first floor of the existing house would have a separation distance of approximately 16.3m, although views would largely be restricted by the proposed boundary fence. In addition, the proposed development would have a smaller roof form and lower ridge height than those, meaning that the visual impact would be comparatively reduced. As a result the impacts on privacy and amenity are similar to the established characteristics of the area, and
- 8.24 It is considered the proposed development would not have a significant effect on the amenities of the host property or nos. 28 and 32 in terms of overshadowing, loss of light, outlook, loss of privacy, overlooking, openness, overbearing form of development or sense of enclosure or any other identifiable harm as to withhold planning permission. It is however recommended for an appropriately worded condition be attached for details of side boundary treatments to be agreed to limit the potential for overlooking.



Aerial View

- 8.25 With regard to no. 79N Riddlesdown Road (next door to the new house), there are no side facing windows in the side flank wall adjacent to the boundary. See

photograph below. It is considered the proposed development would not have a significant impact on the amenities of no. 79N in terms of overshadowing, loss of light, outlook, loss of privacy, overlooking, openness, overbearing form of development or sense of enclosure.

8.26 The dwelling would be used solely for residential purposes, and in the context of the area, it is not considered that this would result in any additional undue harm through noise and disturbance to surrounding occupiers. As such, the proposal accords with aforementioned policies.

Trees, landscaping and biodiversity

8.27 Policy DM28 of the Croydon Local Plan (2018) seeks to protect and enhance the borough's woodlands, trees and hedgerows and that development is not permitted resulting in the avoidable loss or deterioration of irreplaceable habitats, including ancient woodland, hedgerows and veteran trees. Policy G7 of the London Plan (2021) is also of relevance.

8.28 There is not a Tree Preservation Order on the site. Whilst there are some small trees/shrubs on the site (e.g. Field Maple, Hazel) there are no trees of merit on site.

8.29 In terms of landscaping, it is proposed to provide permeable paving at the front of the site as well as soft landscaping. To the rear of the proposed dwelling a patio area would be provided which would be permeable, a lawn and soft landscaping would also be provided as well as natural screening adjacent to the proposed fence at rear. It is recommended for details to be secured via an appropriately worded landscaping condition including details of retaining walls.

8.30 Policy G6 of the London Plan (2021) states development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process. This is reiterated in Policy DM27 of the Croydon Local Plan 2018 (Protecting and enhancing our biodiversity).

To enhance biodiversity across the borough and improve access to nature, development proposals should:

- a. Incorporate biodiversity on development sites to enhance local flora and fauna and aid pollination locally;
- b. Incorporate biodiversity within and on buildings in the form of green roofs, green walls or equivalent measures;
- c. Incorporate productive landscapes in the design and layout of buildings and landscaping of all major developments⁸⁰;
- d. Have no adverse impact on land with biodiversity or geo-diversity value as designated on the Policies Map; and
- e. Have no adverse impact on species of animal or plant or their habitat protected under British or European law, highlighted within a local/regional Biodiversity Action Plan, or when the Council is presented with evidence that a protected species would be affected.

8.31 Protected species are a material planning consideration. The site has a large area of hardstanding where the existing garage and shed are located with soft landscaping adjacent which would need to be removed to facilitate the development. A preliminary Ecological Appraisal (PEA) has been submitted. The Preliminary Ecological Assessment (Furesfen, June 2023) relating to the likely impacts of development on designated sites, protected species and Priority species & habitats

and identification of appropriate mitigation measures. It is considered that there is sufficient ecological information available for determination of this application. This provides certainty for the LPA of the likely impacts on designated sites, protected and Priority species & habitats and, with appropriate mitigation measures secured, the development can be made acceptable.

- 8.32 No protected species or habitats were identified on the site. The Council's external Ecological Assessor has advised that the mitigation measures identified in the PEA (Furesfen, June 2023) should be secured by a condition of any consent and implemented in full. This should include a Construction Environmental Management Plan (CEMP) for Biodiversity detailing how the off-site grassland will be protected throughout the construction period. This is necessary to conserve and enhance protected and Priority species. The reasonable biodiversity enhancement measures outlined within the PEA, including bat and bird access tiles / boxes, native species planting and inclusion of fruit trees, hedgehog connectivity measures, hedgerow creation is welcomed.

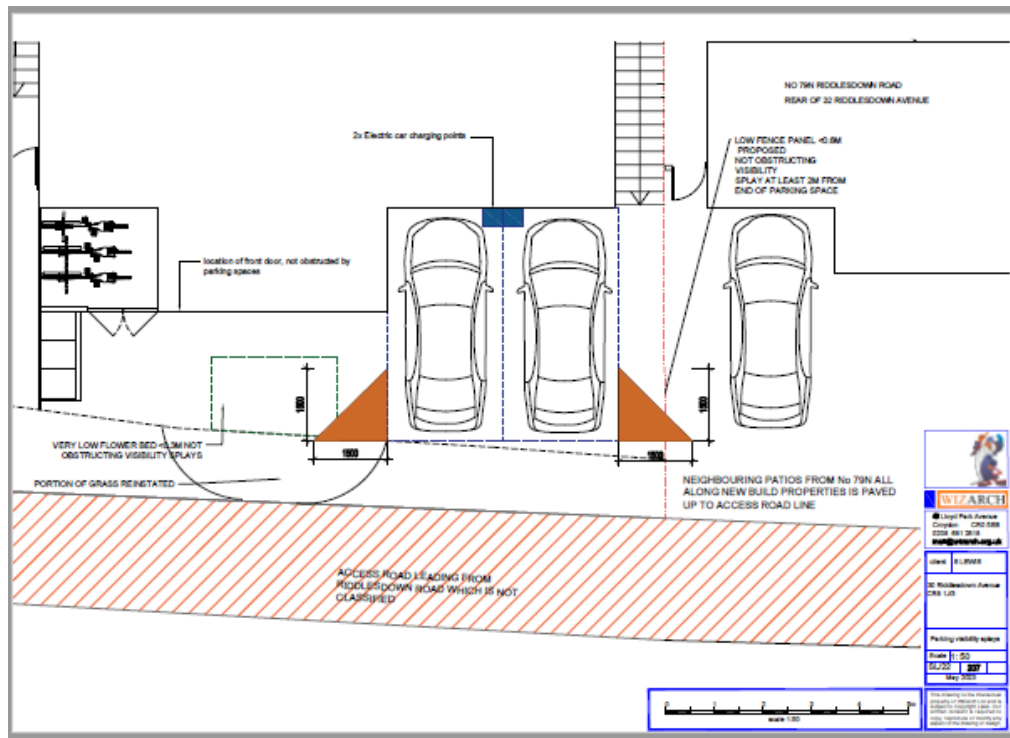
External lighting is proposed and therefore a wildlife sensitive lighting design scheme condition is also recommended. Four ecological conditions are therefore recommended.

Access, parking and highway impacts

- 8.33 Policy SP8 of the Croydon Local Plan (2018) concerns traffic generation, sustainable travelling and parking standards. Policy DM29 of the Croydon Local Plan (2018) requires development to have a positive impact; not have a detrimental impact on highway safety for pedestrians, cyclists, public transport users and private vehicles. In order to reduce impact on traffic movement the Council will require new development to promote measures to increase the use of public transport, cycling and walking.
- 8.34 The location of the existing house on the site is shown on the TFL WebCAT website as having a PTAL 1a which indicates a relatively poor level of accessibility to public transport. This is based on it only being in walking distance of one bus route; the 412 on Mitchley Avenue. However, the site is shown on Google Maps as being approximately 500m from Riddlesdown Station (400m to the entrance plus about another 100m walking distance to the platform), which is well within the 960m distance used for the calculation; therefore, in reality the accessibility is higher than this. The new house on Riddlesdown Road would have similar bus accessibility, and would be about 150m further from the station, but still well within the 960m walking distance. On sites with PTAL 1a, Table 10.3 of Policy T6.1 of the London Plan (2021) requires a maximum of 1.5 car parking spaces per dwelling, (for sites with PTAL 2 this is reduced to a maximum of 1 space per dwelling). The proposed development would result in the loss of one car parking space for the existing house at 30 Riddlesdown Avenue (accessed from Riddlesdown Road), which the development seeks to replace in front of the new house. The new house would also be permitted

up to 1.5 spaces (or 1 whole space), with a second parking space also being proposed on the site; or 2 spaces in total, both accessed from Riddlesdown Road. Although the parking space for the existing house would be in front of the new house and accessed from the rear, that is similar to the current arrangement; and there would be direct rear access via a garden path (again, similar to the current arrangement). Two parking spaces adjacent to each other facing Riddlesdown Avenue was also the arrangement granted in respect of application 16/04621/FUL at the adjacent site (No. 79N), so although this is an unusual arrangement, it is not unprecedented within the area.

- 8.36 Both Riddlesdown Road and Riddlesdown Avenue have unrestricted parking (other than an overnight parking ban for 5 tonne vehicles and coaches on Riddlesdown Avenue). A parking stress survey has been submitted to cover the eventuality that the occupiers of either house choose to park on their respective streets. Parking stress varies between 51% and 63%, with 19-28 spaces available on each street on each night of the survey. This is well below the 85% usually considered “high stress” and demonstrates a significant amount of on-street capacity which can accommodate the overspill parking from the new houses. The Council’s transport planner has advised that the survey does not demonstrate that other committed developments have been taken into account and the survey was carried out when private schools had already broken up, and therefore its findings are limited. However, given the proposal is for one dwelling and there are no major development proposals within the survey area, the survey is sufficient to demonstrate that the parking of one additional house would not cause severe harm to the highway network (which is the test set out in the NPPF). In the event that there is overspill parking. The additional impact this would create on Riddlesdown Avenue would be minimal and given the provision of a parking space for the host and space for the proposed dwelling was previously supported at the adjacent site, it is considered that there is not sufficient evidence to warrant refusing the planning application based on insufficient parking. The Council’s transport planner has also raised a concern that there is no disabled parking space proposed, however officers note that there is no policy requirement for this to be provided for one dwelling.
- 8.37 With regard to the parking layout, (see plan below and aerial view in paragraph 8.24 above). The parking space would be set approximately 1m from the side boundary leaving space to access the proposed access steps to the rear garden. Drawing number SL/22 207 has an annotation stating that part of the side boundary fencing would be under 0.6m “not obstructing visibility splay at least 2m from end of parking space”. Part of the visibility splay would be over the front garden of no. 79N Riddlesdown Road, which is out of the applicant’s control. However, visibility would be improved compared to the current situation, and therefore there would be no harm to highway safety. The junction of the access road with the main carriageway along Riddlesdown Road is established and used for access to the existing garage to the rear of no. 30, among others. It is not considered the use of this junction by parking for one additional dwelling would significantly alter the safety and efficiency of the junction.



Parking Plan (Plan: SL/22 207)

8.38 It is acknowledged that additional dwellings being granted and implemented incrementally will have some impact on the access road. It should be noted that one of the refusal reasons in respect of an application to the rear of 34 and 36 Riddlesdown Avenue (application 19/05914/FUL, for 5 homes) was refused on the ground “The proposed development, by reason of the failure to enter into legal agreement to secure localised improvements to the service road would be likely to result in unacceptable pressure on the road condition and access to the site, and could result in a detrimental impact on the safe operation of the adjacent pedestrian areas and highway”. This application was the subject of a planning appeal. As part of the appeal a unilateral undertaking was submitted, to provide £50,000 (£10,000 per home) towards upgrading the access drive parallel to Riddlesdown Road. Another £50,000 has also been received from neighbouring development towards this upgrade work. The Inspector for the appeal considered that an undertaking would be necessary in respect of road improvements. The appeal was allowed. It should be noted that the applicant has agreed to pay a financial contribution of £10,000 towards improvements of the access road. This has been discussed with the Council’s highways team who have explained that some of the funding received has already been spent on preliminary work (feasibility, topographical surveys, 3 design pack options, structural design, drainage options RSAs etc.); and that more expensive options have been ruled out due to costs, but that this contribution added to the remainder of the funds already collected will be sufficient to implement a road safety improvement scheme, which is to turn the service road into a one way system, implement new street lighting, and repair pot holes. This scheme (subject to the

outstanding funding) is designed and ready to be implemented; therefore the additional financial contribution from this development will facilitate safety improvements which will be a benefit to residents on Riddlesdown Road.

- 8.39 The siting of electric vehicle charging points have been shown. It is recommended for full details to be secured via an appropriately worded condition.
- 8.40 Concern has been raised in respect of the layout of the cycle store not being large enough to accommodate space for wider/adapted bikes. The cycle store shows the provision of 3 bikes. (See parking plan above). It should be noted that planning policy requires the provision of 2 cycle spaces. Sheffield Stands have also been shown and the external doors would be at least 1.2m wide. It is considered the cycle store is of an adequate size to accommodate the 2 bikes required by policy and would alternatively provide space for wider/adapted bikes. It is considered this can adequately be dealt with via condition.
- 8.41 Policy DM13 of the Croydon Local Plan (2018) states refuse/recycling should be sensitively integrated within the building, ensure facilities are well screened, provide adequate space for temporary storage of waste (including bulky waste) materials generated by the development and provide layouts that ensure facilities are safe, conveniently located and easily accessible by occupants, operatives and their vehicles.
- 8.42 A refuse store would be located to the front of the proposed dwelling. It is required to provide space for 2 x 240ltr bins for refuse/recycling, 1x180ltr bins for landfill. Plan SL/22 104A states the timber store would provide space for 3 x 240L bins. This is considered acceptable. It is recommended for details to be secured via an appropriately worded condition. In terms of bulky waste, it is considered there would be sufficient space available when necessary.
- 8.43 It is recommended for a condition to be attached for a Construction Logistic Plan (including a conditions survey) to be secured as a pre-commencement condition), and an informative placed on the decision in respect of works being carried out in line with the Council's "Code of Practice on the Control of Noise and Pollution from Construction Sites". Highway matters can be placed on the decision as an informative.
- 8.44 Additional information has been submitted including visibility splays, swept path information, access dimensions and parking bay dimensions. It is considered the level of information is satisfactory for the nature of the development. Relevant details can to secured/controlled via appropriately worded conditions and/or informatives

Fire safety

- 8.45 Policy D5 of the London Plan (2021) seeks for inclusive design and Policy D12 of the London Plan (2021) states in the interests of fire safety and to ensure the safety

of all building users, all development proposals must achieve the highest standards of fire safety.

8.46 A Planning Fire Safety Strategy and Fire Safety Plan have been submitted. The details on Fire Safety submitted by the Applicant's authorised agent were considered to sufficiently address the requisite fire safety measures/procedures. Subject to the imposition of an appropriately worded condition the proposed development would comply with Policy D12.

Flood risk and energy efficiency

8.47 Policy SI 12 and Policy SI 13 of the London Plan 2021 state that development proposals must comply with the flood risk assessment and management requirements of the NPPF and utilise sustainable urban drainage systems (SUDS). The London Plan (2021) states that current and expected flood risk from all sources should be managed in a sustainable way and that particular surface water management issues should be identified and measures implemented to aim to reduce these risks. Policies SP6.4 and DM25 seek to reduce the risk of flooding in the borough and ensure that all developments incorporate sustainable urban drainage systems (SUDS).

8.48 The site is identified as at very low risk of surface water flooding on the Environment Agency website. A Flood Risk Assessment (FRA) has been submitted which states the site falls within flood zone 1 where there is less than 1 in 1000 annual probability of river or sea flooding (<0.1%). The report also states the site resides just outside a critical drainage area boundary, that the site is located within the London Clay which typically restricts any large volumes of groundwater to percolate from the surface and that the ground water vulnerability maps indicate the site resides in an Unproductive region of groundwater vulnerability. Officers note that the new house would replace an area of hardstanding and that the new paving/driveway would be permeable, therefore limiting the impact on surface water drainage.

8.49 Thames Water were consulted and responded in respect of "surface water drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection". Matters in respect of surface water, ground water discharges and other matters raised by Thames Water can be placed on the decision by way of an informative in order to bring the applicants attention to the advice given.

8.50 The SuDS mitigation measures would include permeable paving as well as channel drainage to all thresholds and slopes away from the building from all hardstanding areas which is considered to be acceptable in principle. A green roof is also proposed which would reduce surface water run-off. Whilst these are acceptable in principle and the provision of a water butt could be secured via a suitably worded condition, in this instance, given the site sits on clay, it is considered additional information is required in this regard. Given the nature of the proposal and relatively

low flood risk, it is considered this can adequately be dealt with by way of an appropriately worded pre-commencement condition.

- 8.51 Appropriately worded conditions would be attached for details of the external energy generation measures and a condition to ensure that the mains water consumption would meet a target of 110 litres or less per head per day.

Archaeology

- 8.52 DM18.9 of the Croydon Local Plan (2018) states - In consultation with the Greater London Archaeological Advisory Service, or equivalent authority, the Council will require the necessary level of investigation and recording for development proposals that affect, or have the potential to affect Croydon's archaeological heritage. Remains of archaeological importance, whether scheduled or not, should be protected in situ or, if this is not possible, excavated and removed as directed by the Greater London Archaeological Advisory Service or equivalent authority. Policy HC1 of the London Plan (2021) is also of relevance.

- 8.53 The site falls within an Archaeological Priority Area (Tier II – London to Brighton Roman Road). Historic England have confirmed that given the site falls within Tier II and the nature of the proposal it is unlikely to have a significant effect on heritage assets of archaeological interest in this instance.

Other Planning Issues

- 8.54 It is recommended for a condition be attached for a Construction Logistic Plan to be submitted (as a pre-commencement condition) and for an informative to be placed on the decision in respect of works being carried out in line with the Council's "Code of Practice on the Control of Noise and Pollution from Construction Sites".
- 8.55 With regard to infrastructure, the scheme would be CIL liable. The levy amount has been calculated to ensure that the development contributes to meeting the need for physical and social infrastructure, including educational and healthcare facilities.

Conclusions

- 8.56 The provision of an additional dwelling within the Borough is encouraged by the Council's Local Plan policies, national guidance in the NPPF and regional policies of the London Plan. The proposed new dwelling would add to the supply of family sized housing in the area, whilst respecting the local character. It would not result in unacceptable impacts in terms of highways, amenity, or environmental impacts, and would result in a sustainable form of development.
- 8.57 All other relevant policies and considerations, including the statutory duties set out in the Equalities Act 2010, the Human Rights Act, the Planning and Compulsory Purchase Act, and the Town and Country Planning Act, have been taken into account. Given 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 terms subject to the detailed recommendation set out in section 2 (RECOMMENDATION).