

1 APPLICATION DETAILS

Ref: 24/00389/FUL
 Location: Land at the junction of Coombe Road and Edridge Road, Croydon, CR0 1BD
 Ward: Fairfield
 Description: Erection of four x two storey houses with accommodation in the roof space with associated landscaping, refuse storage and cycle storage
 Drawing Nos: Location Plan 22012 001 P1; Proposed Ground Floor Plan 22012 100 P9; Proposed First Floor Plan 22012 101 P9; Proposed Second Floor Plan 22012 102 P9; Proposed Roof Plan 22012 103 P9; Proposed South Elevation 22012 200 P7; Proposed North Elevation 22012 202 P7; Proposed West Elevation 22012 201 P7; Proposed East Elevation 22012 203 P8; Proposed Section Looking North 22012 250 P7; Proposed Section Looking East 22012 251 P7; Proposed Landscape Plan 22012 150 P9; Bin Store Details House 1 22012 175 P7; Bin Store Details Houses 2, 3 & 4 22012 176 P7; Rear Garden Bike Store Details Houses 1, 2, 3 & 4 22012 177 P7; Proposed Ground Floor Plan with Finished Floor Levels 22012 100 P8; Existing Site Plan with Levels 22012 010 P6; Refuse Diagram 22012 165 P9.
 Applicant: Regent Land and Developments Ltd
 Agent: Q Square Group
 Case Officer: Gregg Chapman

	1B	2B	3B	4B	TOTAL
Existing	0	0	0	0	0
Proposed (Market Housing)	0	0	3	1	4

Vehicle and Cycle Parking (London Plan Standards)		
PTAL: 6a		
	Standard	Proposed
Car Parking Maximum Standard	Car Free	0
Long Stay Cycle Storage minimum	8	12
Short Stay Cycle Storage minimum	2	0

1.1 This application is being reported to committee because:

- The ward councillors (Cllr Chris Clark and Cllr Ria Patel) 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:

- A. The prior completion of a legal agreement to secure the following planning obligations:
- a) Sustainable Transport contribution of £6,000.
 - b) Restriction on future residents obtaining car parking permits.
 - c) Maintenance of replacement tree planting.
 - d) Any other planning obligation(s) considered necessary by the Director of Planning and Sustainable Regeneration.

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) Development implemented in accordance with submitted drawings

Pre-commencement

- 3) Notwithstanding the details on the plans - details of external materials to be submitted and approved including detailed design of specified elements (fenestration, walls, etc.)
- 4) Provision of contaminated land assessment – limited intrusive ground assessment
- 5) Footway and Carriageway Survey and requirement to make good

Prior to Development Above Ground Floor Slab Level

- 6) Detailed hard and soft landscaping maintenance/management plan including boundary treatments

Prior to Occupation

- 7) Provision of cycle storage and refuse storage
- 8) Submission of details of any external energy generation
- 9) Provision of recommended ecological enhancement measures

Compliance

- 10) Compliance with requirements of the Fire Statement
- 11) Compliance with recommendations of Arboriculture Survey and Report - but no consent is granted for the pruning of the neighbouring Red Chestnut
- 12) Compliance with recommendations of Biodiversity Survey and Report. In addition, grass to be cut in two stages. Trees for removal to be left on site in log piles.
- 13) Compliance with Surface Water/Drainage Strategy
- 14) Compliance with Construction Management Plan
- 15) Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 2015 (as amended) no development relating to Classes A and B of Part 1 (Development within the curtilage of a dwellinghouse)

- 16) 110 litres per person water efficiency targets to be met
- 17) M4(2) accessibility compliance for each home
- 18) Any other planning condition(s) considered necessary by the Director of Planning and Sustainable Regeneration.

Informatives

- 1) Granted subject to a Section 106 Agreement
- 2) Community Infrastructure Levy
- 3) Historic England informative
- 4) Thames Water informative
- 5) Code of practice for Construction Sites
- 6) Compliance with Building/Fire Regulations
- 7) Construction Logistics Informative
- 8) A s278 Agreement will be required for any works to the public highway.
- 9) Any other informative(s) considered necessary by the Director of Planning and Sustainable Regeneration

2.4 That the Committee confirms that it has had special regard to the desirability of preserving the settings of listed buildings and features of special architectural or historic interest as required by Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

2.5 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.

2.6 That, if within 3 months the legal agreement has not been completed, the Director of Planning and Sustainable Regeneration is delegated authority to refuse planning permission.

3 PROPOSAL AND LOCATION DETAILS

Proposal

3.1 The proposal is to erect a two and a half storey terrace of four properties to provide three three bed homes and one four bed home. All homes would have private rear gardens. Plots two to four would have a shared rear access.



Figure 1: proposed ground floor plan

Amendments

- 3.2 Amendments were provided on 20th May 2024 in response to Officer comments. The amendments were to enliven the end (eastern) elevation of plot 4. An oriel window, and brick detailing are now added to the end elevation. In addition, existing and proposed levels details were provided.
- 3.3 Amendments were provided on 24th May 2024 in response to Officer and consultee comments. These are:
- 1) The widening of the side accessways by 20cm (from 1.0 metre to 1.2 metres) to allow sufficient space for bicycles.
 - 2) The inclusion of two Fastigiata Trees (as requested by the Tree Officer).
 - 3) The relocation of bin storage away from the listed wall to rear gardens at the request of the Conservation Officer.
- 3.4 None of these changes were significant enough to require re-notification.

Site and Surroundings

- 3.5 The site falls within Croydon Metropolitan Centre and the Opportunity Area, at a crossroads, and between the junction of Coombe Road and Edridge Road. Coombe Road is part of the Transport for London (TfL) managed highway network.
- 3.6 Coombe Road has a variety of building lines, with some two and three storey buildings being set at the back of the pavement. Edridge Road, at the point nearest to the application site, comprises predominantly terraced houses set back from the street by small front yards. The crossroads is dominated by the Queen Anne mansion block diagonally opposite. Ruskin House (Grade II Listed) dominates the Park Lane/ Coombe Road junction and is set back from the road, creating a sense of spaciousness and grandeur.
- 3.7 The ground level rises from west to east. There are no Tree Protection Orders on the site, which falls within a Tier 2 Archaeological Priority Area and is at slight risk of flooding from surface water. It lies within a Source Protection Zone (protecting subterranean drinking waters) and has a Public Transport Accessibility Level (PTAL) of 6a (very high).



Figure 2: Street Scene



Figure 3: Aerial photograph of the site



Figure 4: Site Location Plan

Planning Designations and Constraints

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

- PTAL: 6a
- Croydon Metropolitan Centre
- Opportunity Area
- Archaeological Priority Area
- Flood Risk Zone: 1
- Surface water flood risk: Slight Risk
- Coombe Road is a TfL Road
- Ruskin House has a number of protected trees (TPO 8, 1974 and TPO 46, 2010)

Planning History

23/01981/PRE	To redevelop to provide four, new homes.	Initial Response Sent 07.08.2023.
17/06330/FUL	Erection of a three-storey building to provide eight one bedroom flats with accommodation in the roof space and the erection of a two storey 3 bedroom house with accommodation in the roof space with landscaping and other associated works	Approved 3 rd August 2018 (expired 3 rd August 2021).



Figures 5, 6 & 7: Site Layout Plan, Visual Representation and Front Elevation of scheme 17/06330/FUL



Figure 8: Visual Representation of current scheme with scheme 17/06330/FUL shown hatched by way of comparison

4 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- 4.1 This is an application to erect a terrace of four houses (three three bed and one four bed dwellings) on a plot of land which is currently informally used as open space but was previously a terrace of houses until they were demolished during World War II following bomb damage.
- 4.2 The proposal provides housing to meet the housing targets set out in the Croydon Local Plan 2018 and is seen as a positive use of a site which contained houses until WWII. It is acknowledged that the site has been used for local space, however this is not protected in policy terms.
- 4.3 Ruskin House, adjacent to the site at the junction of Park Lane and Coombe Road, is Grade II Listed, and the proposal is not considered to cause harm to this heritage asset, due to the form and appearance of the scheme.

- 4.4 The proposal would have an acceptable impact on residential amenity of adjoining occupiers – the adjacent terrace is not directly overlooked by principal room windows and would retain adequate light and outlook. A single storey element of the end property is nearest to the Edridge Road terrace.
- 4.5 The standard of residential accommodation would be high. All units would have private amenity space.
- 4.6 The site is in a Tier 2 Archaeological Priority Area. Onsite archaeological excavations have previously been undertaken to assess the importance and likelihood of significant archaeology to be present on site. This found that the site had a low archaeological potential, and that no further archaeological work was required, which was agreed with by the Greater London Archaeological Advisory Service.
- 4.7 No parking is provided which is considered appropriate in the Opportunity Area and an area of high public transport accessibility (6a, on a scale of 1 – 6b). Adequate cycle and bin stores would be provided, and details would be controlled by condition.
- 4.8 Four trees of mixed amenity value would be lost. Twelve replacement trees of varying size are proposed, including the two trees that the Tree Officer considers necessary.
- 4.9 The previous approved scheme for four storey flatted development, which has now expired, is a significant material planning consideration. This is because the Local Planning Authority have previously found that such a level of development could be accommodated (subject to conditions and a legal agreement) without harm to the character and appearance of the area, the setting of Ruskin House, and highways/sustainability. This proposal for a terrace of four dwellings (replicating the pre-war presence of four terraced houses), including four family homes is considered to be of a high standard and supported.

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:

Greater London Archaeological Advisory Service (Statutory Consultee)

5.3 No objection.

Conservation Officer

5.4 Support, subject to conditions. *[Officer comment: conditions are recommended]*

Highways

5.5 No objection, subject to a s106 Legal Agreement and conditions *[Officer comment: a combination of s106 and conditions are recommended]*

Trees

5.6 No objection, subject to the inclusion of two mature Fastigiate trees to the frontage. *[Officer comment: The application plans have been amended to include this]*

Ecology

- 5.7 No objection, subject to conditions regarding grass cutting and log piles. *[Officer comment: conditions are recommended]*

6 LOCAL REPRESENTATION

- 6.1 A total of 21 neighbouring properties were notified about the application and invited to comment and the application was also advertised by site notice. The number of representations received from neighbours, local groups etc in response to notification and publicity of the application (including re-notification following amendments) were as follows:

No of individual responses: 8 Objecting: 8 Commenting: 0

No of petitions received: 0

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

Objection	Officer comment
<u>Development</u>	
Loss of Green Space. Overdevelopment. Cramped and poor quality accommodation. Little amenity space. Not suitable for those with accessibility needs. Not affordable housing.	Noted. Please refer to section 8.2 – 8.7 of the report.
<u>Character</u>	
Out of character with buildings nearby. Too tall. Red brick inappropriate – need redstock or yellowstock (imperial) bricks. Poor materials. Loss of Trees.	Noted. Please refer to section 8.8- 8.18. of the report.
<u>Drainage</u>	
Unlikely to allow for sufficient drainage. Drainage problems in area.	Noted. Please refer to section 8.48 – 8.50 of the report.
<u>Heritage</u>	
Impact on setting of Grade II listed Ruskin House and Victorian Terraces. Designed modern houses are inappropriate. There were three not four houses here before.	Noted. Please refer to section 8.12 – 8.19 of the report.
<u>Biodiversity</u>	
Loss of a green biodiverse open space/habitat.	Noted. Please refer to section 8.41 – 8.42 of the report.
<u>Noise</u>	
Ruskin House is a licenced premises and hosts various clubs and events. Noise assessment appears selective.	Noted. Please refer to section 8.30 – 8.35 of the report.
<u>Highways</u>	
No off street parking. Proposal would exacerbate parking problems. There is no cycle parking provision. Servicing the front of properties will	Noted. Please refer to section 8.43 – 8.47 of the report.

lead to congestion and poor sightlines. Layout will be a distraction to drivers.	
<u>Overlooking</u>	
Overlooking of Ruskin House Gardens and adjacent houses.	Noted. Please refer to section 8.23 – 8.24 of the report.
<u>Other Matters</u>	
Development will cause movement of neighbouring Ruskin House	This is not a material planning consideration. Foundations are a matter of Building Regulations. If any damage to neighbouring property were to occur, then that would be a private, civil matter.
Land should not have been sold for development by the council.	Land ownership, or the past motives for sale are not a material consideration in the determination of the application.

6.3 Cllr Chris Clark and Cllr Ria Patel have referred the application 24/00389/FUL to the Planning Committee. Cllr Esther Sutton has objected. The following concerns were raised;

Cllr Chris Clark – Objection (and referral)

- Loss of open space
- Impact on street scene
- Adverse impact on neighbouring heritage building, Ruskin House

Cllr Ria Patel – Objection (and referral)

- Loss of one of the only green spaces in Fairfield ward.
- Loss of 4 trees and bushes
- Concern around the development being dense
- Concern that the application is out of touch with the neighbouring Grade II listed building, Ruskin House
- Lack of information about the energy efficiency of the proposed building.
- Interest in whether the embodied-carbon in the proposed new-build has been considered or measured.

Cllr Esther Sutton – Objection

- Residents are very concerned about the loss of an existing green space and four trees
- Proposed development is quite dense, and out of keeping of the surrounding area being next to Ruskin House a Grade II listed building.
- Concerned about the embodied carbon and energy efficiency in the new-build
- Want to know more about the construction materials used.

7 RELEVANT PLANNING POLICIES AND GUIDANCE

7.1 The Council's adopted Development Plan consists of the London Plan (LP) (2021), the Croydon Local Plan (CLP) (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)

- GG1 Building Strong and Inclusive Communities
- GG2 Making Best Use of Land
- GG4 Delivering Homes Londoners Need
- SD1 Opportunity Areas
- D1 London's Form, Character and Capacity Growth
- 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
- D13 Agent of change
- D14 Noise
- H1 Increasing Housing Supply
- H2 Small sites
- H10 Housing Size Mix
- HC1 Heritage Conservation and Growth
- G5 Urban Greening
- G6 Biodiversity and Access to Nature
- G7 Trees and Woodlands
- SI 2 Minimising Greenhouse Gas Emissions
- SI 12 Flood Risk Management
- SI 13 Sustainable Drainage
- T4 Assessing and Mitigating Transport Impacts
- T5 Cycling
- T6 Car Parking

Croydon Local Plan (2018)

- SP2 Homes
- SP4 Urban Design and Local Character
- SP6 Environment and Climate Change
- SP7 Green Grid
- SP8 Transport and Communications
- DM1 Housing Choice for Sustainable Communities
- DM4 Development in Croydon Metropolitan Centre, District and Local Centres
- DM10 Design and Character
- DM13 Refuse and Recycling
- DM16 Promoting Healthy Communities
- DM18 Heritage Assets and Conservation
- DM23 Development and Construction
- DM25 Sustainable Drainage
- DM27 Protecting and Enhancing our Biodiversity

- DM28 Trees
- DM29 Promoting Sustainable Travel
- DM30 Car and Cycle Parking
- DM38 Croydon Opportunity Area

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 2023, 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 several key issues for the delivery of sustainable development, those most relevant to this case are:

Chapter 2 - Achieving Sustainable Development

Chapter 4 - Decision Making

Chapter 5 - Promoting Sustainable Transport

Chapter 8 - Promoting Healthy and Safe Communities

Chapter 9 - Promoting Sustainable Development

Chapter 11 - Making Effective Use of Land

Chapter 12 - Achieving Well Designed Places

Chapter 14 - Climate Change and Flooding

Chapter 15 - Conserving and Enhancing the Natural Environment

Chapter 16 - Conserving and Enhancing the Historic Environment

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:

- Croydon Opportunity Area Planning Framework SPD (2013)
- London Housing SPG (2016)
- Technical Housing Standards: Nationally Described Space Standard (2015)
- National Design Guide (2021)
- Mayor of London's London Plan Guidance Housing Design Standards (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, Character of the Area, and Heritage
3. Impact on Neighbouring Residential Amenity
4. Quality of Residential Accommodation
5. Trees, Landscaping and Biodiversity
6. Transport, Parking and Highways
7. Flood Risk and Water Efficiency

- 8. Other Planning Matters
- 9. Conclusions

Principle of Development

- 8.2 The Croydon Local Plan (CLP) sets out a housing target of 32,890 homes over a 20-year period from 2016-2036. The London Plan (LP) sets out a housing target for the borough of 2,079 homes per year. The CLP also sets out a target for development on Windfall sites of 10,060 homes (approximately 503 per year). The LP requires 6,410 net completions on small sites (below 0.25 hectares in size) over 10 years, with a small-sites housing target of 641 per year.
- 8.3 CLP policy SP2 explains that developments should ensure land is used efficiently. LP policy H1 states that boroughs should optimise housing delivery on sites of PTAL 3-6 or within 800m of a train station or town centre boundary. The site has a PTAL of 6a and is within the Croydon Metropolitan Centre and Croydon Opportunity Area, within character area 6 (Southern and Old Town) including the development of 7,300 new homes.
- 8.4 The site is currently a publicly accessible green space with grass, a small path and some trees (which are not protected), albeit that the site was previously developed as a terrace of properties which were demolished following bomb damage during the Second World War. This site is not designated as green space within the CLP. Whilst there is amenity value to the wider community, there is no policy protection offered to the current use of the space.
- 8.5 The current area is small, with no facilities, and there are a number of open spaces in the local area which offer significantly more play and recreation opportunities, including Park Hill Park (250m away) and Queens Gardens (400m). As such the site's development is not considered to significantly impact on the provision of open space in the wider area.
- 8.6 The Council has previously found (application 17/06330/FUL), under the CLP and Opportunity Area Framework that the development of the site (more intensively than now proposed but with less family housing) is acceptable in principle. Whilst this permission has expired, and the London Plan has since been updated, the immediate character of the site has not significantly changed. The site history is a significant material consideration.
- 8.7 There is no policy to restrict the proposed use of the site to a specific use, so a residential proposal is acceptable in principle to help meet the housing targets set out in the CLP and Opportunity Area Framework. The proposal provides four family units which are a notable benefit of the scheme. Through CLP policy SP2 and LP policy H1, it could be anticipated that the site should be developed more intensively (as previously consented through application 17/06330/FUL). The application must be determined as submitted, and there is a careful balance to be struck between the amount of development and the character of the area/historic conservation. This is set out below.

Design, Character of the Area and Heritage

- 8.8 Policies SP4.1 and DM10.1 of the CLP 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

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. LP 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.

- 8.9 The site lies within the Croydon Opportunity Area. Policy SP4.4 states that in the Opportunity Area the Council will support high-quality, high-density developments that are tailored to, and help to protect or establish local identity. This is reflected by the approved flatted development of application 17/06330/FUL.
- 8.10 The site sits at the junction of Coombe Road, Edridge Road and Heathfield Road and so is highly visible. The proposal seeks to continue the form of terraced properties fronting on to Edridge Road round the corner, a similar form to that which had historically existed. This layout would restore the traditional street pattern and provide a positive frontage to Coombe Road. The “Heathfield Gardens” mansion block diagonally opposite the site is a decorative three storey building with accommodation in a roof mansard and addresses the corner. The relationship with the Grade II listed Ruskin Court is discussed below. The height of the proposal, at two and a half storeys, would be similar to the terraced properties at Edridge Road (and notably lower than the previously approved scheme) and would not overly dominate the massing of the area. The street scene elevation is provided above at Figure 2.
- 8.11 The appearance of the properties has been subject to third party concern, referring to a blandness, and with criticism of materials. The proposed dwellings are simple in their designed form, as is usual of terraced properties, but do have interest, with extended front bays, which include a covered porch, dividing stone parapet separators, large modern windows, and brick detailing, with a step between properties two and three (in height and forward projection). The eastern elevation, which will be visible in the public realm could be enlivened, and a condition to secure this is proposed. Materials are shown within the Design and Access Statement to include brown and red multistock brick, arranged in different patterns, with stone, and artificial slate. Further details are not provided. Therefore, given the prominence of the location, and the heritage setting (discussed below), a condition is proposed that requires the submission of materials, notwithstanding that which is shown, to ensure a high standard of finish is achieved.

Heritage

- 8.12 S66 of the Town and Country Planning Act (1990) places a statutory duty upon Local Planning Authorities to have special regard to the importance of preserving or enhancing listed buildings, including their setting, and must be (and are) given great weight in decision making. Policy HC1 of the LP and policy DM18 of the CLP recognise the importance of heritage, seeking to ensure that there is not harm to such assets.
- 8.13 The site was originally part of the early 18th century property Coombehill, which is now called Ruskin House and is Grade II listed (listed in 1951). With its surviving 18th century form and features, this building has both historical and architectural significance.
- 8.14 The area which is now the subject of the planning application contained outbuildings as shown on the 1868 county survey. The property was subdivided towards the end of the 19th century when Edridge Road was formed. By 1910 the houses on the east side of Edridge Road had been built, including those replacing the outbuildings and facing Coombe Road (Upper Coombe Street as it was then). The houses on the corner, some

possibly with commercial premises on the ground floor, were designed to accommodate the curve of the corner site. The corner houses remained in place until the Second World War when they may have been demolished due to war damage. The site appears to have remained vacant since and is now a grassed open space.

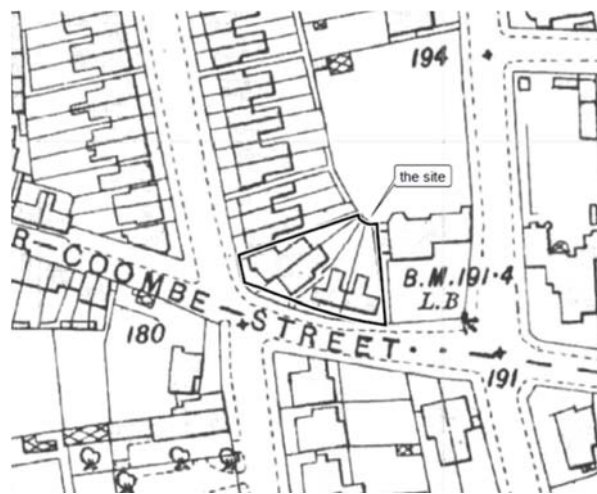


Figure 9: Ordnance Survey Map, 1913

- 8.15 In heritage terms, part of the history of the site is with developed form. The Historic Environment Officer confirms that there is therefore no objection to the principle of development. This also reflects the council past decision for application 17/06330/FUL.
- 8.16 The proposed dwellings are designed as a terrace of four two and a half storey properties with a simple form. The layout allows for front and back gardens and street boundaries which emphasise the traditional layout of Victorian development neighbouring the site and echoes a similar pattern of development which was previously on the site. The line of the new development is sited and orientated away Ruskin House, and by design, less so on the Edridge Rd end, so that the proposed development addresses the curved corner as the original buildings on the site did.
- 8.17 Subject to conditions regarding materials and detailing, it is considered that the proposed development would preserve the setting of the Grade II listed building at Ruskin House. The Historic Environment Officer supports the proposed scheme.
- 8.18 Additionally, and whilst not a statutory designation, the Victorian terrace buildings, the Heathfield Gardens Mansion block, and the locally listed detached 18 Edridge Road are undesignated heritage assets (as defined within the NPPF). The proposed development, similarly to the assessment of Ruskin House, would not cause harm to their setting, given the historic presence of development at the site, and the proposed scale and form of development.

Archaeology

- 8.19 Section 16 of the NPPF and policy HC1 of the LP make the conservation of archaeological interest a material planning consideration. The area has a good archaeological potential and this is recognised in its classification as a Tier II APA. The past presence and clearance of dwellings at the site suggests that archaeological levels may have already been truncated. The evidence examined indicates that the archaeological potential is broad by period, but likely to be limited by extent. The Greater London Archaeological Advisory Service (GLAAS) has considered the proposal and confirmed that the development is unlikely to have a significant effect on heritage assets of archaeological interest and is therefore acceptable in this regard.

Impact on Neighbouring Residential Amenity

- 8.20 Policy DM10 of the CLP specifies that proposals should protect the amenity of the occupiers of adjoining buildings and should not result in direct overlooking to habitable rooms, or private outdoor space within 10m perpendicular to the rear elevation of a dwelling. Furthermore, proposals should ensure that they do not result in significant loss of sunlight or daylight levels of adjoining occupiers. Policy SP4 seeks to respect and enhance character to create sustainable communities and enhance social cohesion and well-being. It ensures that the amenity of the occupiers of adjoining buildings are protected, taking into account the context of a development, in this case being within the Metropolitan Centre and Opportunity Area.
- 8.21 The properties that have the most potential to be affected are 127 Edridge Road and Ruskin House. A daylight and sunlight report has been submitted which demonstrates the impact of the development on the nearest residential properties, namely those 127 Edridge Road. These have been assessed in accordance with the BRE Guidelines.
- 8.22 The sunlight and daylight assessment found 100% compliance with the BRE tests (Vertical Sky Components, internal Daylight Distribution and Annual and Winter Sunlight) and included within the assessment the impact on approved extensions to 127 Edridge Road (22/02946/HSE and 22/02944/LP). It is considered that the proposed development would have a negligible impact on the sunlight and daylight of the surroundings properties. The taller/bulkier previous approved scheme (17/06330/FUL) had also complied, finding a negligible impact.
- 8.23 In terms of impact on privacy, the rear elevation of the terrace would have bedrooms/bathrooms facing their respective rear gardens at first and second floor. This would allow for some mutual overlooking of the side and rear garden of neighbouring properties with 127 Edridge Road being the closest. This is not unusual within a residential environment, and whilst the proposed dwellings are angled towards the boundary, as the corner turns, the relationship is not a direct (back-to-back) relationship where clear inward views of rooms could be provided. Any impact from the angled relationship is any event nullified by the presence of glazed/bathroom windows at first and second floor of 127 Edridge Road, as shown on application 22/02944/LP, including within the dormer, that is being completed currently. Ground floor windows are set behind boundary treatment. The main private garden area of 127 Edridge Road is set back from the proposed development by virtue of the rear two storey projection and is already mutually overlooked by its neighbour.
- 8.24 Ruskin House is a non-residential building which is unlikely to be significantly impacted upon by the proposal. Any overlooking of the amenity area of the commercial premises would not cause harm to residential amenity and is not unusual the context of mixed residential and commercial uses within the vicinity.
- 8.25 It is also of relevance that the taller and bulkier previously approved scheme, which is a material consideration, would have had a greater presence in the outlook from neighbouring properties, although 127 Edridge Road has since been extended.

8.26 Concerns have been raised about the impact of construction. These would only be temporary and so should be afforded very little weight. A detailed Construction Logistics Plan (including working hours, routing, delivery management, and site storage/working compound) is provided with the application. Compliance with the submitted plan is considered to be necessary to ensure that impacts are managed and acceptable. Again, it is worth raising the material consideration of the previous, larger permission when considering the impact of construction.

Quality of Residential Accommodation

8.27 LP policy SP2.7 sets a strategic target for 30% of all new homes over the plan period to have three or more bedrooms to ensure that the borough's need for family sized units is met. The proposal is for 3 x 3 bed and 1 x 4 dwellings which would contribute towards the Council's need for family sized homes, resulting in a net gain of four family sized homes. A third-party objector raises comment that the proposals are not affordable housing. As the proposal is not major development, this is not a policy requirement.

8.28 The National Design Guide states that well-designed homes should be functional, accessible and sustainable. LP 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 and requires that 75% of the GIA of each dwelling has a floor to ceiling height of over 2.5m. CLP policy DM10.4 and LP policy D6 set out the standards for external private amenity space which is for 5sqm per 1-2 person unit and an extra 1sqm per occupant thereafter. The table below summarises the assessment of the internal and external spaces of the proposed new dwellings against LP policy D6.

Plot	Size (beds/person)	GIA (sqm) proposed	Min. GIA (sqm)	Private Amenity Space (sqm)	Min. Amenity Space (sqm)
1	4B/5P	143.7	103	35.1	9
2	3B/4P	115.6	90	40.2	8
3	3B/4P	115.6	90	38.4	8
4	3B/4P	115.6	90	34.1	8

Table 1: scheme considered against London Plan Policy D6 and Table 3.1

8.29 All units exceed the Nationally Described Space Standards, and the CLP and LP policy expectations. All are arranged with their main outlook being to the front and are dual aspect (which the LP notes has inherent benefits) with secondary windows to the rear. As such, the proposed units themselves are considered to have good internal and external amenity and access to light and outlook.

8.30 Policy D13 of the LP and policy seek to ensure that there is not unacceptable conflict between noise generating commercial uses and noise sensitive uses. The proposed units have their front aspect fronting the junction and Coombe Road and so would be relatively noisy. However, being dual aspect, opening windows are also present for rooms from the rear to allow airflow. This is a betterment from the previous approval (17/06330/FUL), which had flats that had all primary accommodation fronting the highway.

8.31 Concern has been expressed by third parties with respect to events that may occur at the neighbouring Ruskin House.

- 8.32 Previous application 17/06330/FUL addressed both traffic noise and commercial noise by imposing a condition to ensure that mitigation measures were delivered to restrict internal noise levels.
- 8.33 The current application has submitted a Noise Survey report. The survey found that mitigation was not necessary. The assessment details are noted. Whilst third parties question this, it is clear that there are a number of residential properties within the vicinity already, and that any loud commercial noises (including from events) would be required to respect the amenities of all residents within the area including those from Edridge Road who have rear gardens facing Ruskin House. Road noise can be mitigated by opening rear windows (which was not always the case with the consented scheme).
- 8.34 LP policy D12 requires all development proposals to achieve the highest standards of fire safety. Details have been provided accordingly. In the event of an emergency a fire appliance could stop on Coome Road or Edridge Road. The dwellings would be provided with fire alarms. There is a protected staircase route from the top floor to the ground floor escape doors. As a result (and subject to compliance with the Building Regulations), the application complies with Policy D12.
- 8.35 LP policy D7 states that 10% of new build housing should meet Building Regulation requirement M4(3) 'Wheelchair User Dwellings'; and all other dwellings should meet the Building Regulation requirement M4(2) 'Accessible and Adaptable Dwellings' which requires step free access to all units and the facilities of the site. The houses are step-free and would have a paved pedestrian access to the front door, and as such would be able to comply with M4(2). A condition is recommended, with final matters secured through building regulations.

Trees, Landscaping and Biodiversity

Trees and Landscaping

- 8.36 CLP policy DM28 and LP policy T7 seek to retain existing trees and vegetation. The application has been supported by an Arboricultural Statement and Survey. CLP policy DM10.8 requires the incorporation of soft and hard landscaping within development proposals.
- 8.37 The site is not within a Conservation Area and there are no protected trees on the site. The submitted Arboriculture Statement and Survey identifies two category 'C' (trees of low quality) cherry trees, one category 'U' Crab apple (trees of a quality that cannot realistically be retained), and one category 'C' shrub (Cotoneaster). These will all be removed to facilitate the development. In addition, works are identified to prune the overhanging crown (to retain an even and flowing canopy) of the protected Red Chestnut at Ruskin House (TPO 8, 1974), which is identified as a category 'B' (moderate quality) tree.
- 8.38 The Red Chestnut at the adjacent site has a root protection area which extends into the site. Permeable block paving is proposed within the canopy within the application site. Tree protection measures are not considered to be necessary due to the presence of the boundary wall. Ground protection is proposed during works. The Tree Officer has no objection to the proposed development, noting that pruning works to the Red Chestnut are not in fact necessary due to the separation, and recommending that two

(tall and mature) Fastigiata trees are planted to the frontage for amenity value. The applicant has amended their plans to show such trees.

- 8.39 A condition requiring the development to be undertaken in accordance with the requirements of the Arboricultural Method Statement (other than the pruning of the neighbouring Red Chestnut as this is not needed) is considered to be necessary.
- 8.40 The application proposes the planting of twelve new trees (seven within the front area and five within rear gardens – including the Fastigiata trees), as part of the landscaping scheme supporting this development. It is considered necessary to require further details of landscaping to be provided by condition, and that a maintenance scheme is adhered to for these trees (as part of the legal agreement).

Biodiversity

- 8.41 CLP policy DM27 and LP policy G6 seeks to protect and enhance biodiversity. The start date for 10% Biodiversity Net Gain for minor new development is for applications submitted after 2nd April 2024, which this application was not. Notwithstanding this, the applicant has submitted an assessment that demonstrates that there would be a 34% increase as a result of targeted planting of appropriate grasses and an increase in tree numbers.
- 8.42 In terms of Ecology, a site survey was undertaken to establish a baseline of ecological information. Limited ecological interest was identified. A cavity with limited potential for a bat roost was identified on one tree. This was inspected with an endoscope and no indication of bat presence found. It is, however, recommended that the soft fell of the tree (with an Ecologist in attendance) and clearance of trees outside of the bird nesting season (unless accompanied by an Ecologist) occurs. These recommendations are proposed to be secured by way of condition to ensure compliance with the Biodiversity Survey and Report. In addition, the Ecology Officer, who has no objection, recommends that the grass is cut in two stages, and that the trees that are replaced are left on site to create log piles. The Ecology Officer has no objection to the proposal, subject to these conditions.

Transport, Parking and Highways

- 8.43 LP policies T4 and T6.1 (and Table 10.3) set out parking standards for proposed development. CLP policies SP8, DM29, and DM30 provide further guidance with respect to parking and state that development should not adversely impact upon the safety of the highway network.
- 8.44 The site is located in an area with a PTAL (public transport accessibility level) of 6a which is very good on a scale of 0 (worst) - 6b (best). In accessible areas such as this the aforementioned policies seek the provision of car free development (as a maximum standard).
- 8.45 The site is within a CPZ, Permit Holders (Zone C&W) Payment Parking (Tariff T1&T3). The site itself fronts the junction (Coombe Road is a Classified A road), which has single yellow lines (and proposes no parking). A clause of the legal agreement is recommended to ensure that future residents do not apply for parking permits (on street or within council car parks). Contributions towards sustainable modes of transport are also sought. Given the detail of the proposal, and subject to such legal agreement clauses, the proposal would not give rise to significant private vehicle trips which would materially impact the free flow or safe movement of vehicles on the local

highway. There is no objection from the Highway Officer to the development (including cycle and refuse storage discussed below).

- 8.46 CLP policy DM10 states that the Council will support proposals that incorporate cycle parking within the building envelope. Failing that, the council will require cycle parking to be located within safe, secure, well-lit, and conveniently located weather-proof shelters unobtrusively located within the setting of the building. Policies DM16 and DM29 of the CLP promote active travel including cycling. London Plan policy T5 (and table 10.2) promotes cycling and requires adequate cycle storage, in line with the London Cycling Design Guide. In this instance, at least 2 cycle spaces are required per dwelling to comply with the London Plan. Cycle parking is proposed on site in secure cycle stores (3 spaces per dwelling) and is above the required standards and can be secured by condition. The route to the cycle storage areas (and revised bin storage areas as below) has at the request of the Highways Officer been widened by c.20 cm (to 120cm) to allow ease of movement of cycles/bins (to meet standards).

Refuse Storage

- 8.47 Policy DM13 of the CLP requires the design of refuse and recycling facilities to be treated as an integral element of the overall design. Each dwelling would be served by bin storage (which has been relocated to rear gardens at the request of the Conservation Officer to prevent potential damage to the listed wall). On collection day the residents will move the bins up to a location on the side of the road. The Highway Officer confirms that there is sufficient space within the development. Collection would be the same as per the arrangements for the other houses within the vicinity and is considered acceptable (and less impactful than the previously approved flats) in this regard.

Flood Risk and Water Efficiency

- 8.48 LP policy SI13 requires developments to achieve greenfield runoff rates and to manage surface water as close to source as possible by following the drainage hierarchy. CLP policies SP6 and DM25 require all developments to incorporate SUDS to reduce surface water runoff and provide water treatment on site.
- 8.49 The detailed submitted Flood Risk Assessment Statement notes that the site is located within Flood Zone 1 (low probability), and that the risk of flooding from all sources (fluvial, surface water, groundwater, sewer) has been found to be negligible or low. A very low level (less than 1%) risk of surface water flooding is shown to the front of the site on Coombe Road.
- 8.50 The application proposes rainwater re-use through water butts, rain gardens, permeable surfaces, attenuation tank (with best possible discharge rate), and connection to a surface water sewer (that has been analysed and found feasible). Surface water runoff from the site would be significantly reduced (and slowed). This is considered to be a well-reasoned site drainage scheme.

Water Efficiency

- 8.51 Policy SP6 of the CLP requires the development to meet a minimum water efficiency standard of 110 litres/person/day. A planning condition is recommended to secure compliance with the domestic water consumption target of 110 litres/person/day, to ensure sustainable use of resources.

Other Planning Matters

8.52 Comments have been received regarding embodied carbon and climate change. To reduce greenhouse gas emissions and deliver development that is adaptable in a changing climate policy SP6 of the CLP seeks to reduce energy and carbon dioxide (CO₂). For minor developments (ten units or fewer), it is stated that, *“The Council will seek high standards of sustainable design and construction from new development, conversion, and refurbishment to assist in meeting local and national CO₂ reduction targets. This will be achieved by: a. Requiring new-build residential development of fewer than 10 units to achieve the national technical standard for energy efficiency in new homes (2015). This is set at a minimum of 19% CO₂ reduction beyond the Building Regulations Part L (2013)”*. In the past this requirement had been met by the imposition of planning conditions requiring detail of how this would be achieved. However, the new current Part L (2021) Building Regulation requirement is for a 31% CO₂ reduction from part L 2013. Therefore, through Building Regulations, policy SP6 is met in this respect, and conditions and further details are not necessary or reasonable.

Conclusions

- 8.53 The proposed provision of four family dwellings at Edridge Road and Coombe Road, within the Croydon Metropolitan and Opportunity Area is acceptable in principle in accordance with policy. The siting of the proposed dwellings would relate successfully to the existing pattern of development and historic terraced development form that was located at the site prior to World War II. The proposal is considered to be an improvement from the previous consented flatted scheme, which is a material consideration, and would provide a good quality of accommodation internally and externally.
- 8.54 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.
- 8.55 Given the general consistency of the scheme with the Development Plan and weighing this against all other material planning considerations, including the benefits and the harm outlined within this report, the proposal is acceptable in planning terms subject to the detailed recommendation set out in section 2 (RECOMMENDATION).