

PART 6: Planning Applications for Decision

Item 6.1

1 APPLICATION DETAILS

Ref: 17/06314/FUL
 Location: Land to the North and South of Shrublands Avenue, Croydon, CR0 8JD
 Ward: Shirley South
 Description: Demolition of garages and erection of one four-storey building and two three-storey buildings comprising of 26 residential units (15 x one-bedroom and 11 x two-bedroom flats) together with associated car parking and cycle parking spaces, hard and soft landscaping, alterations to ground levels, servicing arrangements, refuse and recycling facilities, and public and private amenity space
 Drawing Nos: See drawing issue register dated 11/01/18
 Applicant: Brick by Brick Croydon Limited
 Agent: Carter Jonas LLP
 Case Officer: Richard Freeman / Chris Stacey

	1B2P	2B4P	TOTAL
AFFORDABLE RENT	15	11	26
PRIVATE	0	0	0
TOTAL	15	11	26
FAMILY UNITS	0	11	11

Number of car parking spaces	Number of cycle parking spaces
33	54

- 1.1 This application is being reported to Planning Committee because objections above the threshold in the Committee Consideration Criteria have been received and as the former Ward Councillor for the former Shirley Ward (Councillor Chatterjee – now Ward Councillor for Shirley North) made representations in accordance with the Committee Consideration Criteria and requested Planning Committee consideration.
- 1.2 As such, both Councillor Chatterjee and currently sitting Shirley South Ward Councillors have been contacted to determine whether anyone would like to address the Planning Committee.

2 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- 2.1 This is an application to erect three residential blocks, one of four storeys (Block A) and two of three storeys (Blocks B and C) housing a total of 26 residential units across two parcels of land which are currently used as communal green space.
- 2.2 The application site has not been designated as a protected open space and as such its loss through redevelopment is in principle acceptable. The use of this site for housing would contribute towards meeting the housing targets set out in the Croydon Local Plan (2018) and is thus seen as a positive use for this site.

- 2.3 The proposed housing tenure and mix is acceptable given the circumstances specific to this development and the wording of relevant policy in both the Croydon Local Plan (2018) and the London Plan (2016).
- 2.4 The design and appearance of the scheme responds positively to the surrounding context and is of a high quality, thus considered to be acceptable.
- 2.5 The proposal would have an acceptable impact on the residential amenity of surrounding occupiers, both in terms of daylight and sunlight levels and privacy for existing surrounding residents.
- 2.6 The standard of residential accommodation would be acceptable, as all units would meet the Nationally Described Space Standards (NDSS), would have sufficient private amenity space and access to sufficient communal amenity and child play space. All units would have good access to light and outlook.
- 2.7 The loss of a number of existing trees along with the proposed landscaping strategy, which would include the provision of a number of new trees and is of a high quality, is deemed to be acceptable.
- 2.8 The proposal complies with the London Plan (2016) hierarchy of: be lean, be clean, be green, and would provide a carbon offsetting payment to meet the Mayor's requirement for all new homes to be zero carbon.
- 2.9 Sufficient car and cycle parking has been proposed, and it is not considered that the proposal would have an adverse impact upon either the capacity or safety of the local transport network.
- 2.10 Suitable planning obligations and conditions have been recommended in order to ensure that the proposed development does not have an adverse impact upon either air quality or the risk of flooding.

3 RECOMMENDATION

- 3.1 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) Provision of 100% affordable housing as affordable rent;
 - b) Air quality mitigation contribution;
 - c) Carbon offset payment;
 - d) Local Employment and Training Strategy and financial contribution;
 - e) Provision of a travel plan;
 - f) Provision of a car club space and membership;
 - g) Relevant monitoring fees;
 - h) Any other planning obligation(s) considered necessary by the Director of Planning and Strategic Transport.
- 3.2 That the Director of Planning and Strategic Transport is delegated authority to negotiate the legal agreement indicated above.

- 3.3 Director of Planning and Strategic Transport is delegated authority to issue the planning permission and impose conditions and informatives to secure the following matters:

Conditions

- 1) Development implemented in accordance with drawings
- 2) Details of materials to be submitted and approved including detailed design of specified elements
- 3) Provision and further details of bin and bicycle stores
- 4) Detailed hard and soft landscaping maintenance/management plan including details of children's play space and communal amenity space
- 5) Detailed sustainable drainage strategy to be provided prior to commencement
- 6) Details of proposed ecological enhancement measures
- 7) Tree protection measures, hand-digging within root protection area and details regarding transplanted trees
- 8) Water efficiency targets to be met
- 9) Sustainable development carbon reduction target to be met and details of proposed PV panels
- 10) The requirement to enter into a Highways Agreement to amend access to the site and stop up an area of the eastern car park
- 11) Provision of a Construction Logistics Plan
- 12) Scheme of archaeological investigations to be undertaken
- 13) Development implemented in accordance with noise report
- 14) Noise from any air handling units, mechanical plant, or any other fixed external machinery to be at least 10dB below existing background noise level
- 15) Mechanical ventilation system to be submitted and approved
- 16) Lighting scheme to be submitted
- 17) 10% units to meet Part M4(3), with others to meet either Part M4(2) or Part M4(1)
- 18) Low emission measures
- 19) Development implemented in accordance with contaminated land report
- 20) Secure by design details
- 21) Development to commence within three years of the date of permission
- 22) Any other planning condition(s) considered necessary by the Director of Planning and Strategic Transport

Informatives

- 1) Requirement for Highway Licence and S.278/S.247 under the Highways Act
 - 2) Thames Water informatives
 - 3) Subject to legal agreement
 - 4) Boiler details
 - 5) Any other informative(s) considered necessary by the Director of Planning
- 3.4 That, if within 6 months the legal agreement has not been completed, the Director of Planning and Strategic Transport is delegated authority to refuse planning permission.
- 3.5 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.

4 PROPOSAL AND LOCATION DETAILS

Proposal

- 4.1 The proposal is to erect three residential blocks, one of four storeys (Block A) and two of three storeys (Blocks B and C) housing a total of 26 residential units. Block A which sits to the north of Shrublands Avenue would provide one one-bed flat and seven two-bed flats. Block B which sits to the south of Shrublands Avenue would provide ten one-bed flats and two two-bed flats, and Block C which also sits to the south of Shrublands Avenue would provide four one-bed flats and two two-bed flats.



Fig.1 – Sketch plan of the proposed layout of the scheme

- 4.2 The proposed landscaping would feature a mixture of soft and hard landscaping, including replacement and additional car parking, child play space, paved access routes and defensible planting around the proposed buildings.

Site and Surroundings

- 4.3 The site sits in the south west-corner of the Shrublands Estate in Shirley South ward and comprises two parcels of land totalling 0.6ha sitting either side of Shrublands Avenue which is a single carriageway local distributor road served by a bus route (see Fig.2). The parcel of land to the north of Shrublands Avenue is an undulating area of communal green space and features two paved footpaths and a number of trees. The parcel of land to the south of Shrublands Avenue is a relatively flat area of communal

green space and features two areas of hardstanding used for parking along with three garages directly to the south of 118-140 Shrublands Avenue and a number of trees.



Fig.2 – Aerial photo of Shrublands indicating the application site

- 4.4 The surrounding area is characterised by a mixture of 1960s 3 and 4 storey blocks of flats and 2 storey terraced houses set within areas of communal green space interspersed with areas of hardstanding used for parking along with garaging. The Shrublands Estate is bounded by dense woodland on its south, east and west sides and suburban streets featuring semi-detached houses to its north.
- 4.5 There are no Tree Protection Orders on the site, the site does not fall within an Archaeological Priority Area (although lies in an area of archaeological interest as it sits 300m from a Tier 2 Archaeological Priority Area), and whilst the site is not at risk of flooding from surface water, Shrublands Avenue falls within a 1000 year surface water flooding zone. The site has a Public Transport Accessibility Level (PTAL) of 1b indicating poor access to public transport.

Planning History

- 4.6 There are no relevant planning applications.

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

5.3 It is recommended that the submitted archaeological desk-based assessment report be approved, and in order to secure the on-going archaeological interest a condition requiring further evaluation of the site is recommended (OFFICER COMMENT: a condition is recommended).

Lead Local Flood Authority

5.4 No objection subject to a pre-commencement condition requiring the submission of detailed designs of a surface water drainage scheme for the site (OFFICER COMMENT: a condition is recommended).

Thames Water

5.5 No objection subject to informative relating to surface water drainage, connections to sewage and water pressure (OFFICER COMMENT: an informative is recommended).

6 LOCAL REPRESENTATION

6.1 A total of 73 neighbouring properties were notified about the application and invited to comment and the application was also advertised by site notice and in the local press. The number of representations received from neighbours, local groups etc. in response to notification and publicity of the application were as follows:

No of individual responses: 9 Objecting: 9 Supporting: 0

No of petitions received: 1 (containing 81 signatories)

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:

Objections

- This development cannot be considered a 'donor site' for another development in Sanderstead
- Impact on parking and safety of local highway network
- Building A will block views for/of approaching traffic
- Building A is much taller than surrounding buildings
- The parking survey has not been carried out at appropriate times
- A traffic management plan detailing sufficient mitigation measures for the development, including during construction, should be secured
- Loss of existing footpath
- Impact on flood risk
- Foul water drainage should be addressed prior to a decision being made
- Will adversely impact upon local character
- Loss of trees
- Impact on surrounding residential properties
- Overdevelopment due to loss of green space

- 6.3 The following issues were raised in representations, but they are not material to the determination of the application:
- The applicant is associated with the Council. [*OFFICER COMMENT: This application has been considered in the normal way and is being reported to Planning Committee for a decision as a Ward Councillor made a referral and a significant number of objections were received.*]
 - The concerns and suggestions raised by residents during the consultation process appear to have been disregarded. [*OFFICER COMMENT: An appropriate level of public engagement has been undertaken and is evidenced in the submitted Statement of Community Involvement.*]
 - The proposed development will have an adverse impact on property prices [*OFFICER COMMENT: Property value is not a material planning consideration.*]
- 6.4 Councillor Chatterjee (the Ward Councillor at the time the application was advertised) objected to the application on the following grounds:
- Out of keeping with the area
 - Would deprive existing residents of much needed amenity space
 - Would lead to surface water flooding
 - Foul water drainage has been inadequately considered
 - The parking survey is not representative
 - Inadequate parking for the development has been proposed
 - No three-bedroom units have been proposed
 - CIL and S.106 funding would not adequately mitigate the impacts of the proposal

7 RELEVANT PLANNING POLICIES AND GUIDANCE

- 7.1 In determining any planning application, the Council is required to have regard to the provisions of its Development Plan so far as is material to the application and to any other material considerations and the determination shall be made in accordance with the plan unless material considerations indicate otherwise. The Council's adopted Development Plan consists of the Croydon Local Plan (2018), Mayor's London Plan (2016) and the South London Waste Plan (2012).
- 7.2 Government guidance is contained in the National Planning Policy Framework (NPPF), revised in July 2018. 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:
- Promoting sustainable transport;
 - Delivering a wide choice of high quality homes;
 - Requiring good design.
- 7.3 The main policy considerations from the London Plan (2016) raised by the application that the Committee are required to consider are:
- Policy 1.1 Delivering the Strategic Vision and Objectives for London
 - Policy 2.18 Green Infrastructure: The Multi-Functional Network of Green and Open Spaces
 - Policy 3.3 Increasing Housing Supply

- Policy 3.4 Optimising Housing Potential
- Policy 3.5 Quality and Design of Housing Developments
- Policy 3.6 Children and Young People’s Play and Informal Recreation Facilities
- Policy 3.8 Housing Choice
- Policy 3.9 Mixed and Balanced Communities
- Policy 3.12 Negotiating Affordable Housing on Individual Private Residential and Mixed Use Schemes
- Policy 3.13 Affordable Housing Thresholds
- Policy 5.2 Minimising Carbon Dioxide Emissions
- Policy 5.3 Sustainable Design and Construction
- Policy 5.7 Renewable Energy
- Policy 5.12 Flood Risk Management
- Policy 5.13 Sustainable Drainage
- Policy 5.14 Water Quality and Wastewater Infrastructure
- Policy 5.15 Water Use and Supplies
- Policy 6.1 Strategic Approach
- Policy 6.3 Assessing Effects of Development on Transport Capacity
- Policy 6.9 Cycling
- Policy 6.13 Parking
- Policy 7.1 Lifetime Neighbourhoods
- Policy 7.2 An Inclusive Environment
- Policy 7.3 Designing Out Crime
- Policy 7.4 Local Character
- Policy 7.6 Architecture
- Policy 7.14 Improving Air Quality
- Policy 7.18 Protecting Open Space and Addressing Deficiency
- Policy 7.19 Biodiversity and Access to Nature
- Policy 7.21 Trees and Woodlands

7.4 There is a new Draft London Plan that has gone out for public consultation which expired on the 2nd March 2018. The GLA’s current program is to have the examination in public of the Draft London Plan in autumn 2018, with the final London Plan published in autumn of 2019. The current 2016 consolidation Plan is still the adopted Development Plan. However the Draft London Plan is a material consideration in planning decisions and will gain more weight as it moves through the process to adoption. At present the plan in general is considered to carry minimal weight.

7.5 The Mayor of London has published and adopted Supplementary Planning Guidance, of which the Affordable Housing and Viability SPG, Housing SPG, Play and Informal Recreation SPG and Sustainable Design and Construction SPG are of relevance.

Croydon Local Plan (2018)

7.6 The new local plan was adopted on the 27th February 2018 and now carry full weight. The main relevant policies to this application are as follows:

- SP2 Homes
- DM1 Housing Choice for Sustainable Communities
- SP4 Urban Design and Local Character

- DM10 Design and Character
- DM13 Refuse and Recycling
- SP6 Environment and Climate Change
- DM23 Development and Construction
- DM25 Sustainable Drainage Systems and Reducing Flood Risk
- SP7 Green Grid
- DM27 Protecting and Enhancing our Biodiversity
- DM28 Trees
- SP8 Transport and Communication
- DM29 Promoting Sustainable Travel and Reducing Congestion
- DM30 Car and Cycle Parking in New Development
- DM45 Shirley

8 MATERIAL PLANNING CONSIDERATIONS

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

1. The Principle of the Development
2. Housing Tenure and Mix
3. Design and Appearance
4. Impact on Surrounding Occupiers
5. Quality of Living Environment for Future Occupiers
6. Landscaping, Biodiversity and Sustainability
7. Transport, Parking and Highways
8. Other Planning Issues

Principle of the Development

- 8.2 Both parcels of land which form the site are publically accessible green spaces with grass and trees, with the northern parcel of land also featuring two paved paths. Policy 7.18 of the London Plan (2016) seeks to resist the loss of protected open spaces, as identified by the Local Planning Authority (LPA) through its Local Development Framework (LDF). The application site has not been designated in the Croydon Local Plan (2018) as a protected open space and whilst the space is of amenity value to the wider community its loss through redevelopment can thus in principle be considered acceptable as it is not protected by policy.
- 8.3 The areas covered by the application site are relatively small and offer no formalised facilities, such as benches, play equipment etc. and there are a number of other similar open spaces within the local area as well as extensive woodlands to the south of the Shrublands Estate. Given the context of the site, its redevelopment is thus not considered to significantly impact on the provision of open space available to those in the wider area. Furthermore a notable portion of the areas covered by the application site will continue to be publically accessible green space and will also benefit from enhancements which would include additional planting and play space.
- 8.4 The application site is not allocated within the Croydon Local Plan (2018) for a particular use and there is no policy restricting the proposed use of the site to a specific use. Given this along with the requirement for a minimum of 32,890 new homes to be delivered over the plan period, of which 10,060 are planned to be delivered on windfall

sites (such as this), the principle of a wholly residential use on this site is considered acceptable.

Housing Tenure and Mix

- 8.5 Policy SP2.4 of the Croydon Local Plan (2018) states that on sites of ten or more dwellings the Council will negotiate to achieve up to 50% affordable housing (subject to viability), and seek a 60:40 split between affordable rented homes and intermediate (including starter) homes. The Affordable Housing and Viability SPG states that the Mayor has an expectation that residential proposals on public land should maximise affordable housing provision and deliver at least 50% affordable housing.
- 8.6 The proposed scheme seeks to provide 100% affordable housing, all of which would be in the form of affordable rented units, where rent controls require a rent level of no more than 80% of the local market rent (inclusive of service charges). Whilst the proposed tenure mix is not compliant with the preferred mix set out in policy, relevant policy does not seek to restrict the overall portion of affordable housing that can be provided within a development, and instead generally seeks to maximise affordable housing within schemes so long as regard is had to the need to promote mixed and balanced communities. Furthermore paragraph 4.4 in the Croydon Local Plan (2018) recognises that 91% of housing need in Croydon is for affordable housing, and given that the preferred mix set out in policy will not meet this need, schemes such as this which deviate from the preferred mix by proposing a higher portion of affordable housing can be supported as they meet an identified need.
- 8.7 In this instance the proposed development seeks to provide 26 new affordable homes on an existing estate which currently has 260 houses and 770 flats and maisonettes, of which many are owner occupied and many are affordable rented properties. Given the modest scale of the proposed development and the mix of tenures already present in the vicinity of the site, it is considered that the delivery of a 100% affordable scheme in this location is not contrary to the policy objectives around creating mixed and balanced communities, and thus is acceptable.
- 8.8 The proposed development seeks to provide a total of 15 one-bed units and 11 two-bed units, representing a mix of 58% one-bed units and 42% two-bed units. Policy DM1 of the Croydon Local Plan (2018) states that within three years of the adoption of the plan, where an assessment demonstrates that larger homes would not be viable, two bedroom, four person homes complying with the Nationally Described Space Standards (NDSS) can be considered to be family accommodation.
- 8.9 In this instance the applicant has undertaken research into the existing mix of units on the Shrublands estate which has concluded that around 85% of the existing properties are three or four bed dwellings and that there is a need for smaller sized units in this locality. Given the above, and the fact that all units meet or exceed the NDSS, the proposed two bedroom, four person properties can constitute family accommodation and would thus represent 42% of the dwellings proposed. Whilst lower than the 60% requirement for sites in an urban setting with a PTAL of 1b, the proposed mix is acceptable given the existing mix of properties within the site's locality.

Design and Appearance

- 8.10 The layout of the proposed development features three buildings, of which one is located to the north of Shrublands Avenue and two are located to its south (see Fig. 1).

Each of the buildings have been located so as not to restrict the permeability of the site and thus respond to the existing character and nature of the Shrublands Estate. Furthermore, 'cranked' building forms have been proposed for the three new blocks in order to respond to the form of a number of existing buildings in the area which are a defining feature of the local character, and is an approach which is supported.

- 8.11 The height of Block A, which sits to the north of Shrublands Avenue is four storeys, whilst the height of both Blocks B and C, which sit to the south of Shrublands Avenue, is three storeys. The majority of buildings within the immediate vicinity of the application site are three storeys in height, whilst other nearby buildings extend to four storeys. When viewed within their surrounding context (see Fig.3) the scale and height of the proposed three buildings are considered to respond positively to the scale and height of the existing surrounding buildings and are thus acceptable.

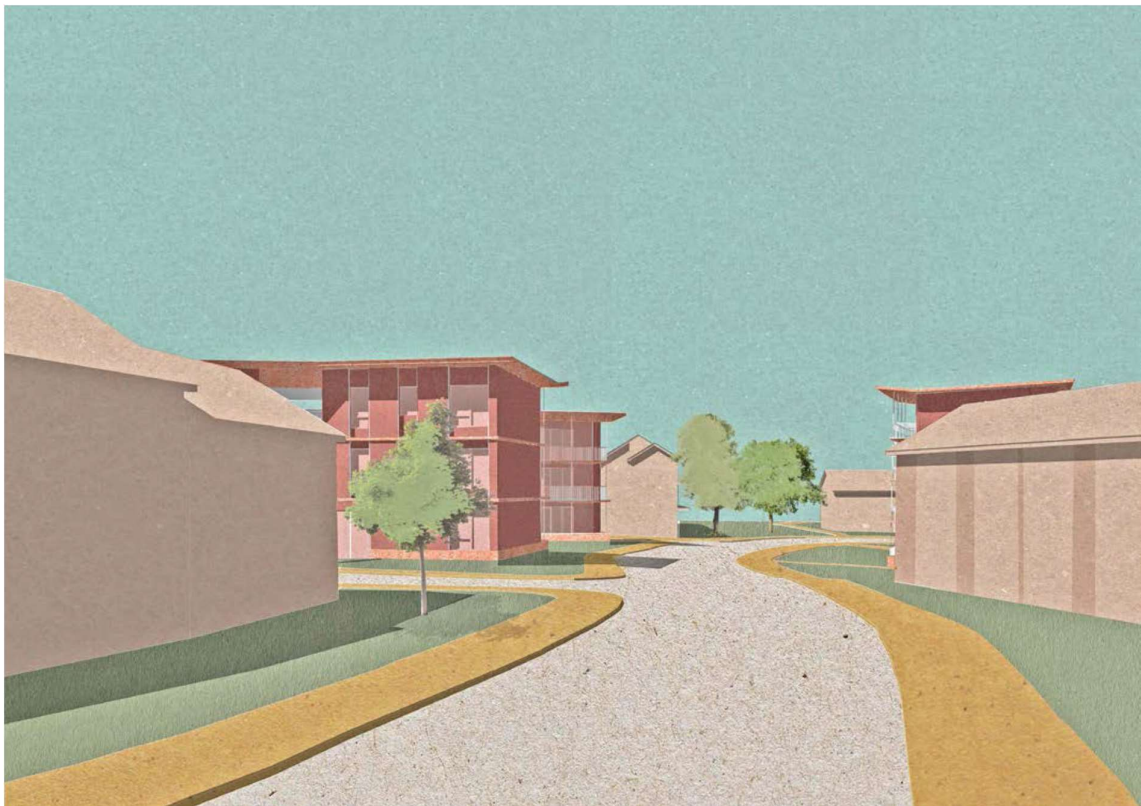


Fig.3 – View of proposal looking west along Shrublands Avenue

- 8.12 A key design feature of the proposed three buildings are their inverted pitched roof forms which have been designed to provide building forms which are distinctive to, yet complement, the existing pitched roof forms found around the Shrublands Estate. Another key design feature found across all three buildings are the external stair cores which aid to break down the mass of the buildings and increase visual permeability through them. Officers are of the view that these design moves are successful in creating distinctive high quality building forms which respect the surrounding character.
- 8.13 The architectural detailing and materiality of the proposed buildings takes reference from the existing buildings found on the Shrublands Estate. The proposed elevations feature a gridded design which emphasises the vertical elements of the buildings through stacking windows and balconies and contrasting them with infill panels, giving the buildings a very strong vertical and horizontal rhythm which is considered to be

successful. The material palette comprises of orange/red brickwork, patterned precast concrete, smooth orange/red precast concrete (for banding details and decks), and silver/bronze metal window frames (see Fig.4). The proposed palette of materials and architectural detailing are of high quality and complement the existing materials found within the surrounding area. In order to ensure quality, a condition requiring further information on the detailed design of the proposal is recommended.



Fig.4 – Proposed material palette and partial elevation

Impact on Surrounding Residents

8.14 The surrounding properties that have the most potential to be affected by the proposals are indicated by Fig.5.

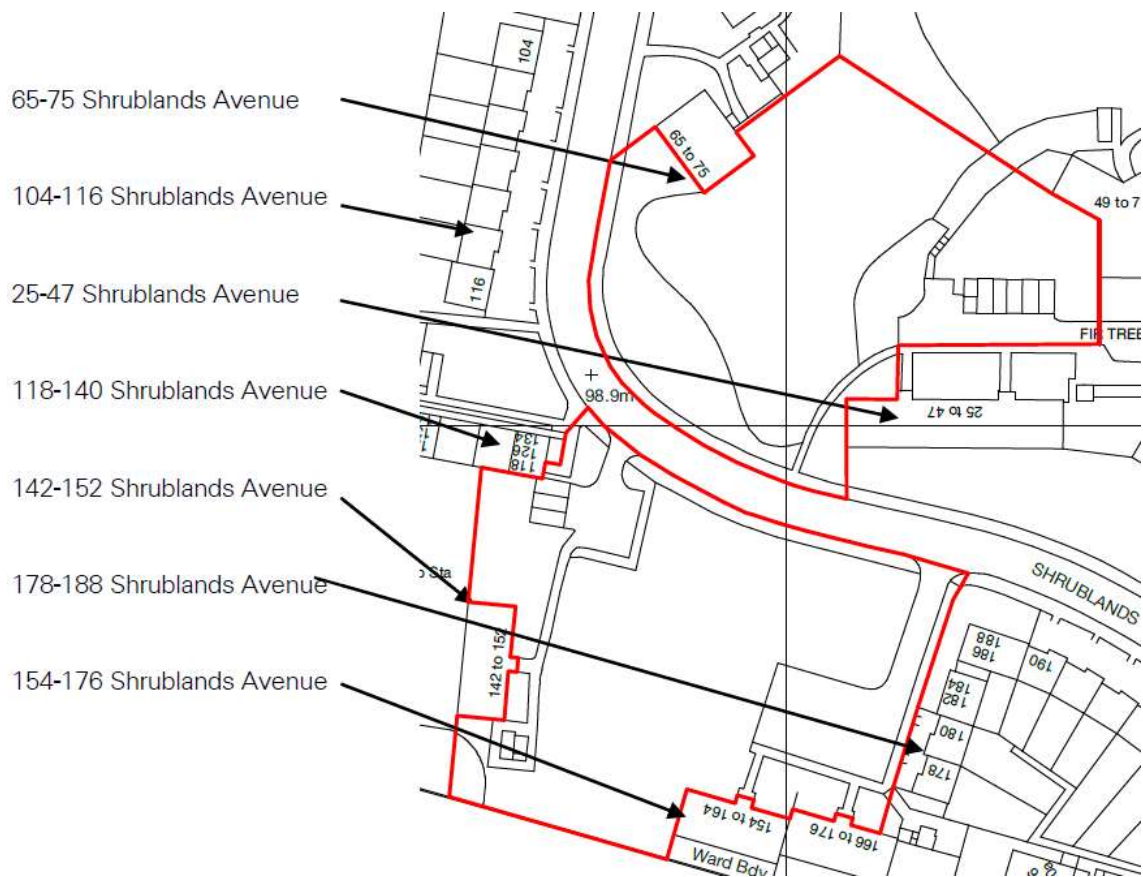


Fig.5 – Surrounding properties in relation to the application site

- 8.15 A daylight and sunlight report has been submitted which demonstrates the impact of the development on all of the above properties. The assessment undertaken is in accordance with the BRE Guidelines. In terms of daylight impacts (assessed through calculating the Vertical Sky Component of individual windows) 159 of the 161 windows assessed comply with BRE guidelines. For the two which do not comply (a ground floor window at 65-75 Shrublands Avenue and a ground floor window at 142-152 Shrublands Avenue), it should be noted that the resultant values for both of these windows are only marginally outside of the BRE guidelines and as such the impact on these properties can only be considered to be minor. In terms of sunlight impacts (assessed through calculating the Annual Probable Sunlight Hours of individual windows that face within 90 degrees of due south) all 42 windows assessed comply with BRE guidelines. A number of surrounding gardens and open spaces have also been assessed (in terms of the total hours of sunlight received by them currently and with the proposal in situ) and all such spaces would comply with BRE guidelines. Given these results, the proposal is therefore acceptable in terms of its daylight and sunlight impacts on surrounding properties.
- 8.16 In terms of overlooking the proposed buildings have been carefully positioned such to reduce instances where windows directly overlook one another. The only instance where proposed windows face each other and are below 18m is between Block B and 142-152 Shrublands Avenue. In this instance the minimum distance between directly facing windows is 16m. Block B has been designed such that all west facing windows (looking towards 142-152 Shrublands Avenue) serve either bathrooms or bedrooms. Furthermore it should be noted that a street separates these two buildings. Given these

circumstances and the fact that such relationships between buildings are common in an urban environment, officers are content that the proposals will afford suitable levels of privacy to existing surrounding residents.

- 8.17 Concerns have been raised regarding the impact of construction, however such impacts would only be temporary and as such should only be afforded limited weight. In order to ensure that such impacts are acceptable it is recommended that a Construction Logistics Plan is secured by condition.

Quality of Living Environment for Future Occupiers

- 8.18 All of the proposed units comply with the Nationally Described Space Standards (NDSS) and all feature generous external balconies, which are a minimum of 1.8m in depth and meet the minimum quantum's stipulated by policy DM10.4 of the Croydon Local Plan (2018). Each stair core throughout the development serves no more than two units per floor.
- 8.19 In accordance with policy DM10.5 of the Croydon Local Plan (2018) communal amenity space is provided to the rear of Block A and between Blocks B and C in the form of informal soft landscaping with paved paths which will be accessible to both future occupants of the proposed development and existing residents of the estate.
- 8.20 The proposed development will result in a child yield of 14 and as such a minimum of 140sqm of child play space is required. Child play space for the proposed development is located between Blocks B and C and will be accessible to both future occupants of the proposed development and existing residents of the estate. In order to ensure the quantum and quality of the communal amenity space and child play space a condition requiring further details and the minimum quantum of such spaces is recommended.
- 8.21 With respect to the amenity of future occupants of the proposed buildings, it is noted that all of the proposed units are either dual or triple aspect, enabling their cross ventilation and ensuring they have good access to light and outlook. The daylight and sunlight assessment submitted confirms this to be the case as all rooms achieve Average Daylight Factor levels in excess of BRE guidelines. In terms of the privacy afforded to future occupants of the proposed buildings, the only instance where proposed windows directly overlook one another occurs between Blocks B and C. It is noted that the distance between these buildings is a minimum of 16m, and this is from the edge of one balcony to another. The distance between the actual windows is a minimum of 19.5m; as such the amenity levels afforded to the proposed units are good.
- 8.22 All three blocks feature level access to the communal lobbies. 10% of the proposed units (in the form of two one-bed dwellings) comply with Part M4(3) (Wheelchair User Dwellings) and whilst the remaining units have been designed to comply with Part M4(2) (Accessible and Adaptable Dwellings), 18 of these do not comply with Part M4(2) due to their location on upper levels without access to a lift. Given the scale and nature of the proposal however it is not considered viable to provide lifts to all three blocks and as such upper level units will instead be required to comply with Part M4(1) (Visitable Dwellings). Three accessible bays have been proposed for the development which is in excess of London Plan (2016) standards.

Landscaping, Biodiversity and Sustainability

- 8.23 The existing site features two areas which are predominantly grassed and features a total of 37 trees. The proposed scheme seeks to remove 14 trees, including some which are considered to be of a moderate quality and value. However it is proposed to transplant two of these trees into the proposed landscaping and plant a further four semi-mature trees, as well as a number of smaller less mature trees. Given the heavily wooded nature of the surrounding area officers do not object to the loss of the proposed trees, and a condition is recommended in order to secure details of the tree protection plan, including further details relating to the two trees which are proposed to be transplanted.



Fig.6 – Illustrative view of the central garden between Blocks B and C (looking north)

- 8.24 The proposed landscaping strategy for the site seeks to provide a sequence of varying spaces across the development creating different character areas. The central garden which sits between Blocks B and C (see Fig.6) has been designed as a series of three glades featuring extensive planting, open areas of grass for informal uses and child play equipment. The space to the rear of Block A has been envisaged as a rain garden featuring a Sustainable Urban Drainage System attenuation area and naturalised landscaping. It is considered that the proposed landscaping strategy is of high quality and will enhance the proposed development and its immediate surroundings. Furthermore given the variety of spaces proposed within the landscaping it is considered the proposals will enhance the biodiversity value of the site. In order to ensure the quality of the proposed landscaping a condition requiring the submission of further details of landscaping and biodiversity enhancements, including their ongoing management, is recommended.

- 8.25 The Mayor's Housing SPG requires new dwellings to be zero carbon, meaning that new dwellings must achieve at least a 35% reduction in regulated carbon emissions over Part L 2013, employing the London Plan (2016) hierarchy of: be lean, be clean, be green, with the remaining regulated CO2 emissions, to 100%, to be offset through a cash in lieu contribution. In this instance the proposed scheme achieves a 38.8% reduction in regulated carbon emissions over Part L 2013 with the remaining regulated CO2 emissions shortfall (to 100%) being covered by a carbon offset payment which would be secured through a section 106 agreement. Renewable technologies are proposed for this development (in accordance with the 'be green' principle) in the form of roof mounted photovoltaic (PV) panels.
- 8.26 In order to ensure that the proposals meet an on-site CO2 emissions reduction of 38.8% a condition requiring details to be submitted confirming that this level of CO2 reductions has been met, along with securing the proposed quantum of PV panels, is recommended. A condition requiring the proposed development to meet a minimum water efficiency standard of 110/litres/person/day is also recommended.

Transport, Parking and Highways

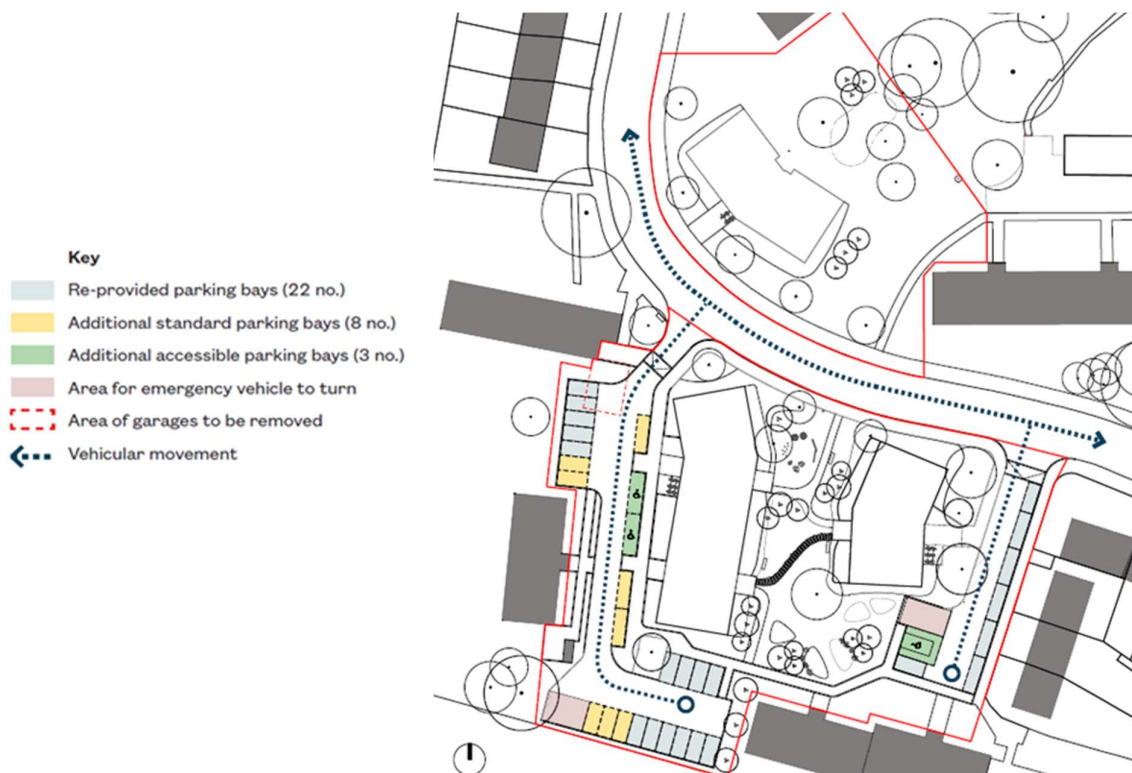


Fig.7 – Proposed parking strategy

- 8.27 The site has a public transport accessibility level (PTAL) of 1b indicating poor access to public transport provision. The application site currently features two surface car parks, adjacent to 118-140 Shrublands Avenue and 154-188 Shrublands Avenue, with the latter being accessed via a narrow access road. Combined these two car parks provide a total of 22 parking bays (however these bays are not clearly demarcated) and directly adjacent to 118-140 Shrublands Avenue sits a block of three garages. All

of the existing car parking and associated hardstanding is set to be removed as part of the proposals. Two new access roads are to be provided at the east and west edges of the southern site serving a total of 33 parking bays, of which 22 comprise of the re-provision of existing parking on site, 8 are additional standards bays for the new dwellings, and 3 are additional accessible bays for the new dwellings (see Fig.7).

- 8.28 In order to establish the existing level of parking demand in the locality a recent parking study during daytime AM and PM hours, along with a night time parking study undertaken in 2016, have been undertaken which covers all roads and parking areas within a 200m walking distance of the site. Said studies have concluded that on average between 42% and 55% of available capacity within the surrounding locality is occupied at any given time, and as such notable capacity within the surrounding locality is available to accommodate any potential increases in parking demand.
- 8.29 In order to predict potential car ownership for the proposed units, census data for the local area has been analysed, which states that average car ownership is 0.6 cars per household. In this instance the proposal seeks to provide a total of 8 additional car parking spaces (inclusive of 3 accessible spaces and accounting for the loss of the three garages) for the development which equates to 0.42 spaces per household. Whilst this is below maximum parking standards, it is slightly lower than local average car ownership, and could thus result in 5 additional vehicles being parked on street. With the exception of the accessible bays which would be allocated to valid blue badge holders, it is not proposed to allocate the proposed spaces to specific dwellings. Given the extent of capacity in the local area identified above, officers are content that this would not adversely impact the operation of the local highway network.
- 8.30 In terms of trip generation it is estimated that the proposed development would generate 30 two-way trips in the AM peak and 22 two-way trips in the PM peak, which is considered to have a negligible impact on the local transport network.
- 8.31 Cycle parking for the proposed development is provided by way of an internal secure bike store within each block for occupants (totalling 38 spaces) and external stands adjacent to the building entrance for visitors (totalling 16 spaces). This provision is in excess of London Plan (2016) standards and is therefore acceptable. A condition requiring further details of the proposed cycle parking and their retention in perpetuity is recommended.
- 8.32 Two existing paved paths run across the northern site, one in an east-west direction and the other in a north-south direction, both connecting Fir Tree Gardens to Shrublands Avenue. Whilst the east-west path will be removed as part of this proposal, the north-south path will remain thus maintaining a direct paved pedestrian link between these two streets.
- 8.33 Delivery and servicing for Blocks B and C would principally take place from the western car park which has been designed to incorporate turning heads that allow refuse and emergency vehicles to enter, manoeuvre and exit the site, as demonstrated by swept path diagrams submitted with the application. Delivery and servicing to Block A is proposed to be done on-street, as per the existing collection procedures elsewhere on the estate.
- 8.34 Each block is served by a communal bin store which can accommodate the requisite quantum of refuse and recycling demand and is within 20m of the waste collection

vehicle point. Refuse and recycling provision is thus considered to be acceptable subject to a condition requiring its retention in perpetuity.

8.35 To ensure that the construction period limits impact on the local highway network, it is recommended that a Construction Logistics Plan (CLP) is conditioned.

8.36 Furthermore a S.278 agreement for the necessary highway works to amend access to the site would be required, along with a S.247 agreement for the stopping up of an area of the eastern car park. A condition for the provision of a car club bay to be provided in the western car park is also recommended.

Other Planning Issues

8.31 As set out in the consultations section of the report, the Greater London Archaeological Advisory Service have requested a condition requiring further evaluation of the site and this has been recommended to be included by officers.

8.32 The scheme's impact on air quality has been considered and conditions would mitigate the impact of the construction phase of the development. A contribution to off-site air quality improvements would be secured through a S.106 agreement.

8.33 The risk of flooding has been considered and a condition requiring the submission of detailed designs of a surface water drainage scheme for the site is recommended.

8.34 This development is no longer being proposed as a 'donor site' for another development in Sanderstead by the same applicant.

Conclusions

8.35 All other relevant policies and considerations, including equalities, have been taken into account. Planning permission should be granted for the reasons set out above. The details of the decision are set out in the RECOMMENDATION.