

**PART 6: Planning Applications for Decision****Item 6.6****1. SUMMARY OF APPLICATION DETAILS**

Ref: 19/04152/FUL

Location: 8-10 Grovelands Road, Purley, CR8 4LA

Ward: Purley and Woodcote

Description: Construction of three building blocks with heights ranging between four to five storeys to accommodate 44 flats with associated vehicular parking spaces, a new vehicular access, cycle and refuse stores and hard and soft landscaping; following demolition of existing two dwellinghouses.

Drawing Nos: A-00 Rev 4; A-01 Rev 2; A02 Rev 2.1; A-03 Rev 2; A-04; A-05; A-06; A-07 Rev 2; A-08 Rev 2; A-09; A-10; A-11 Rev 2; A-12 Rev 2; D-01; D-02A Rev 2; D-02B Rev 2; D-02C Rev 2; D-03; D-04; D-05; D-14; D-15; D17Rev 2; D18; Site Location Plan; (Surface Water Drainage Strategy Preliminary Layout) Dwg no: 4418-01 ; PLANNING STATEMENT, dated Nov 2019; BS5837:2012, Ref: 2019012.1 v2.0 and dated 11 February 2019; CONSTRUCTION LOGISTICS PLAN, Ref: 2212018A Rev 2, dated 10/10/2019; (UPDATED) TRANSPORT ASSESSMENT, dated 25 October 2019; SURFACE WATER DRAINAGE STRATEGY (SWDS) AND FLOOD RISK ASSESSMENT, Ref: 4418 and dated 07/05/2019; Preliminary Ecological Appraisal, Ref; 4417 and dated 12 April 2019; Bat Survey, Ref: 4417. June 2019; Noise Assessment, Ref: 4417, April 2019; ENERGY STATEMENT, Prepared by: H Davey and dated 26 July 2019; and Waste Management Plan, Version 2019C, Oct 2019.

Applicant: Mr Lombard – Purple Pepper Partnership

Case Officer: Karim Badawi

	1B 2P	2B 3P	2B 4P	3B 5P	Total
Existing Provision				2	<b>2</b>
Affordable Rent	1		4	2	<b>7</b>
Shared Ownership	1	1	2	1	<b>5</b>
Market Housing	11	9	9	3	<b>32</b>
Total Proposed	<b>13</b>	<b>10</b>	<b>15</b>	<b>6</b>	<b>44</b>

*70% of the units are proposed for Private sale; 30% of the habitable rooms are proposed for Affordable Housing with a split of 41% Shared Ownership and 59% Affordable Rent by Habitable Room.*

Number of car parking spaces	Number of cycle parking spaces
31	89

- 1.1. This application is being reported to Planning Committee as objections above the threshold in the Committee Consideration Criteria have been received.

## **2. RECOMMENDATION**

- 2.1. That the Planning Committee resolve to GRANT planning permission prior to the completion of a legal agreement to secure the following:
- a) Affordable housing – 13 units (7 x affordable rented and 5 x shared ownership);
  - b) Local Employment and Training contributions;
  - c) Financial contribution towards air quality;
  - d) Contribution to car club space;
  - e) S278 Agreement for the implementation of the highway works;
  - f) Carbon offsetting contribution;
  - g) Private Waste and Recycling collection for the whole development;
  - h) Monitoring fee; and
  - i) And any other planning obligations considered necessary.
- 2.2. That the Director of Planning and Strategic Transport has delegated authority to negotiate the legal agreement indicated above.
- 2.3. That the Director of Planning and Strategic Transport has delegated authority to issue the planning permission and impose conditions and informatives to secure the following matters:

### **Conditions**

- 1. Time limit of 3 years
- 2. Development to be carried out in accordance with the approved drawings and reports except where specified by conditions

### **Pre-Commencement Conditions**

- 3. Details and samples of materials to be submitted for approval;
- 4. Landscaping and child play / communal amenity space and boundary treatment
- 5. Details of children's play-space to be submitted for approval;
- 6. Full details of cycle storage to be submitted for approval;
- 7. Lighting of bin and bike stores, surface and basement parking to be submitted for approval;
- 8. Construction Method Statement

9. Infiltration test and design to be submitted for approval of the LLFA.

#### Pre-Occupation Conditions

10. Public Art details to be submitted for approval;
11. Details of electric vehicle charging point to be submitted;
12. Delivery and servicing plan
13. Car park management plan
14. Bat light
15. Submission of a copy of the EPS license for bats prior to commencement of any development;
16. Replacement trees to be planted prior to occupation in accordance with the submitted Landscape plan.
17. Energy efficiency / sustainability
18. BREEAM (prior to occupation) (S4)
19. Secured by design (D4)

#### Compliance Conditions

20. Accessible homes;
21. Obscure-glazed side windows for non-habitable rooms;
22. Obscure-glazed side windows for Unit 1;
23. Car parking provided as specified;
24. Refuse/cycle parking provided as specified;
25. Visibility splays as approved;
26. Accord with the submitted Construction Logistics Plan
27. Accord with Conclusions and Recommendations section of the submitted Preliminary Ecological Appraisal;
28. Accord with Recommendations section of the submitted Bat Survey;
29. Accordance with Tree Protection Plan
30. Accord with the mitigation measures stated within Surface Water Drainage Strategy (SWDS) and Flood Risk Assessment;
31. Water efficiency
32. Accord with mitigation outlined in Noise Assessment
33. Unexpected contamination
34. Any other planning condition(s) considered necessary by the Director of Planning and Strategic Transport

#### Informatives

1. Granted subject to a Section 106 Agreement
2. Community Infrastructure Levy
3. Code of practice for Construction Sites
4. Nesting birds in buildings
5. Environment Agency advice to applicant regarding contaminated land, piling, drainage and disposal of soil.
6. Light pollution
7. Requirement for ultra-low NOx boilers
8. Thames Water informatives regarding underground assets and public sewers

9. Any other informative(s) considered necessary by the Director of Planning and Strategic Transport.

### 3. PROPOSAL AND LOCATION DETAILS

#### Proposal

#### 3.1. Fig. 1: Proposed Site Plan.



- 3.2. The proposal is for the construction of three building blocks with heights ranging between four to five storeys to accommodate 44 flats (13 x 1-bed, 25 x 2-bed and 6 x 3-bed) with 31 associated parking spaces, a new vehicular access, cycle and refuse stores and hard and soft landscaping; following demolition of existing two dwellinghouses.
- 3.3. The proposed buildings would comprise the following:
- Hunts Building facing Grovelands Road with a height of four storeys above basement level. It would accommodate nine one-bedroom units, seven two-bedroom units and two three-bedroom units.
  - Andrew West building to the west corner with a height of three-storeys above basement level. It would accommodate two one-bedroom units, seven two-bedroom units and two three-bedroom units.
  - Andrew East building to the east corner with a height of four storeys, including basement level. It would accommodate two one-bedroom units and ten two-bedroom units. This block would be entirely dedicated to the affordable housing provision within the development.
- 3.3. The proposed parking provision would comprise the following:
- 16 car parking spaces, including two disabled car parking spaces, under Hunts Building; with direct access from Grovelands Road.

- 15 car parking spaces within the basement of Hunts East building; accessed through new vehicular access along the east boundary of the site.
  - Cycle parking accommodating 74 bicycles within a dedicated space at the ground floor of Andrew East building, in addition to further spaces within the vehicle car parking areas.
- 3.4. Provision of a communal amenity space with a surface area of 306 sqm which includes a 103-sqm children's play area, in addition to refuse stores and a refuse collection area.
- 3.5. During the course of the application amended plans have been received. The main alterations to the scheme have been as follows:
- Amendments to the car parking layouts. (Reason: To introduce disable car parking spaces and improve the refuse store size and location).
  - Amending the Hunt Block car park entrance. (Reason: Following Strategic Transport request)
  - Changes to the proposed soft landscaping (Reason: To introduce significant replacement trees in response to the removal of trees on site)
  - Converting one three-bedroom unit into a two-bedroom unit. (Reason: The new location of the rear refuse store was in close proximity to the main window of one of the bedrooms which would impact the quality of the proposed dwelling. The conversion allowed said window to be secondary).

### **Site and Surroundings**

- 3.6. The application relates to a site which comprises two large two-storey family dwellinghouses. The site sits to the north side of Grovelands Road with an area of 0.24 hectare (2404 sqm), close to the junction with Downlands Road. The site's contour level ascends steeply from east to northwest. It borders Nos 6 and 12 to the east and west respectively and Nos. 33 & 35 Boxridge Avenue and 21 Purley Rise to the north.
- 3.7. **Fig. 2:** Aerial View for the site's location.



- 3.8. The vicinity of the site has a steep, steady rise towards the west of Grovelands Road and is mainly residential comprising of two-storey detached dwellinghouses, the junction with Downlands Road comprises church buildings and the frontage along Brighton Road comprises large mixed-use buildings with three storeys.
- 3.9. The site has a PTAL rating of 4 with an eight minute walk from Reedham railway station and within walking distance to local amenities on Brighton Road.
- 3.10. The site is not subject to a formal tree preservation order; however the north of the site borders heavy vegetation. The site falls outside a medium flood risk zone which extends along Grovelands Road.

### **Planning History**

- 3.11. There are no recent planning applications of relevance at the application site. However Members should be aware of previous pre-application enquiries as detailed below:

- 18/06036/PRE – Residential development of 49 units
- 19/01196/PRE – Residential development of 43 units.

- 3.12. Applications of interest within the surrounding area are detailed below:

#### **99 Downlands Road**

- 19/04169/FUL - Demolition of existing dwelling and erection of a two storey block containing 1no 3 Bed, 2no 2 bed and 6no 1Bed apartments with associated access, 2 parking spaces, 16 space cycle storage and refuse store. [Withdrawn 18/11/2019]

## **4. SUMMARY OF KEY REASONS FOR RECOMMENDATION**

- The principle of intensified residential development is acceptable given the national and local need for housing.
- The proposal includes 30% affordable housing, in accordance with local plan requirements and is the maximum reasonable level of affordable housing currently deliverable in view of scheme viability.
- The proposal includes a policy compliant number of family units.
- The proposed design and appearance of the scheme would be acceptable; the proposed heights would not be excessive considering the steep contour levels of the site. Whilst acknowledged that the mass of built form is significantly greater than the existing structures of site, the proposal accords with the thrust of guidance contained within the Suburban Housing Design SPD.
- The living conditions of adjacent occupiers would be protected from undue harm subject to conditions.
- The proposed residential development would provide quality accommodation for future occupiers and adequate amenity provision.
- The level of parking and impact upon highway safety and efficiency would be acceptable.

- Sustainability aspects have been properly assessed and their delivery can be controlled through planning obligations and planning conditions.

## 5. CONSULTATION RESPONSE

### Lead Local Flood Authority (statutory consultee)

- 5.1. The response from the Lead Local Flood Authority (LLFA) stated that the preferred discharge of surface water for the applicant was infiltration according with the submitted Flood Risk Assessment. However, this would require necessary testing to be designed at a later stage. Accordingly, requested conditions for infiltration testing and its design and for the applicant to have full consultation with Environment Agency and Thames Water as necessary.
- 5.2. The views of the Planning Service are expressed in the MATERIAL PLANNING CONSIDERATIONS section below.

## 6. LOCAL REPRESENTATION

- 6.1. The application has been publicised by 21 letters of notification to neighbouring properties, and two site notices in the vicinity of the application site. The number of representations received from neighbours, a Residents' Association, a local ward Councillor and Local MP in response to notification and publicity of the application are as follows:

No of individual responses: 26      Objecting: 20      Supporting: 6

Comment: 0

- 6.2. The following issues were raised in representations. Those that are material to the determination of the application, are addressed in substance in the MATERIAL PLANNING CONSIDERATIONS section of this report.
- 6.3. The following issues were raised in representations and are material to the determination of the application:

Objection	Response
<b><i>Principle of development</i></b> Full assessment within Section 8A of this report.	
Proposal is contrary to the NPPF, Croydon Local Plan 2018 and Suburban Design Guide 2019 in terms of design, respect to the character of the area.	Officers are satisfied that the proposal would be in line with these documents as discussed in detail within Section 10 of this report.
Overdevelopment and intensification	Officers are satisfied that the proposed density would be in line with the London Plan.



Loss of two family homes	The proposal would provide six three-bedroom units and the loss of two family homes would be acceptable.
<b>Design</b> Full assessment within Section 8C of this report.	
The proposal is not in keeping with the character of the area.	The character of the area is mixed and includes flatted blocks.
The proposed massing is bulky and out of keeping with the context	The proposed design, materials and height would break up the massing of the proposal.
The proposal is an overdevelopment to the site.	Officers are satisfied that the proposal provides appropriate development to the site.
The proposal would be overbearing on the setting of St Swithuns Church	The proposal would not exceed the height of the church and the site is set with an adequate distance to disperse any direct impact onto the setting of the church. Furthermore, the church building is not listed and its setting does not have any designation within the local plan.
The proposal should have a lower height with tiled pitched roofs to make it more acceptable.	Officers are satisfied that the design of the proposal and its appearance.
The proposed grey brick colour is unattractive and the proposal should include red brick and white render	Planning process should not prevent or discourage innovation or change as per the NPPF paragraph 127.
Elevated sites in Purley are inappropriate for flat developments, three-floor developments are only acceptable in Brighton Road Area.	Every application is treated on its own merits. Officers are satisfied this scheme is appropriate to its context.
<b>Proposed Residential</b> Full assessment within Section 8D of this report.	
Inadequate amenity spaces for future occupiers	The proposed amenity space would accord with Croydon Local Plan.
Overlooking between proposed units and with adjoining neighbours	The proposed windows are aligned to avoid inter-overlooking between each other and windows along the boundary would be inset to avoid direct overlooking onto neighbouring properties.



Poor quality development	Officers are satisfied that the proposal would provide quality residential accommodation for future occupiers.
<b>Neighbour Amenity</b> <i>Full assessment within Section 8E of this report.</i>	
Overshadowing onto No. 21 Purley Rise	Officers are satisfied that there would not be significant impact onto due to the proposal's overall height and its separation distance with this neighbouring property.
Loss of privacy to No. 21 Purley Rise	Addressed in the report at paragraphs 8.19 – 8.24
Overlooking survey is not accurate as identified screening trees are not substantial and deciduous.	The Council Tree officer visited the site and did not agree that the trees were deciduous and did provide sufficient privacy screening.
Impact on amenities of adjoining occupiers	Officers are satisfied that the proposal would not impact the amenities of adjoining occupiers as per the assessment within this report.
<b>Traffic &amp; Parking</b> <i>Full assessment within Section 8F of this report.</i>	
Potential parking overspill onto the road	The Council Strategic Transport are satisfied with the proposed parking level.
Potential overspill would impact church visitors, particularly the elderly. Planning committee should consider effective controls put in place to maintain ease of parking and access.	Church parking is out of the application remit and the area does not have a CPZ to enforce any controls.
Impact on traffic movement	The Council Transport Officer did not raise an objection to the proposal.
<b>Impact on Ecology</b> <i>Full assessment within Section 8G of this report.</i>	
Loss of green space would impact wild life.	Appropriate mitigation measures are conditioned to minimise impact on potential existing wildlife.
Tree labelled T19 on the plans for removal is in a good condition and not fair condition as submitted by the applicant.	The Council Tree Officer carried out a site visit and confirmed the tree was in the specified category and did not raise an objection to its removal.

Tree labelled T19 falls on a shared boundary with No. 21 Purley Rise and its ownership is not solely for the applicant.	The applicant submitted a Land Registry Drawings of their ownership accompanied with a Tree Surveyor plan which showed the tree falling within their ownership. The Council Tree Officer carried out a site visit and confirmed the tree falls within the site's boundary but grew to push towards the shared boundary fence.
Loss of green space which is needed on the west side of Purley.	The existing green space is private, the flattened nature of the proposal would not require the same level of green space provision and the proposal would provide generous communal green space.
The proposal would include cutting down a high number of mature trees which would be contrary to politicians green policy.	The NPPF, the London Plan and Croydon Local Plan do not prohibit cutting down trees. The Council Tree Officer did not raise objections regarding the loss of non-TPO trees, the proposed landscape Plan would provide replacement trees to overcome the harm of removing existing trees.
<b><i>Other matters</i></b>	
Shared ownership of Tree T19 with No.21 Purley Rise.	This is a civil matter between the applicant and the neighbouring property.
Lack of communication with the community contrary to the NPPF.	The applicant confirmed engagement with the adjoining properties prior to the submission of the application.
Impact on local infrastructure.	The application would be liable for CIL payment which would contribute to delivering infrastructure to support the development of the area.
Impact on construction works onto adjoining properties in terms of waste, noise and air pollution.	The decision notice would include a Construction Method Statement to ensure minimum distribution to neighbouring properties during construction process.

- 6.4. Note that a number of non-planning related concerns (eg loss of view, setting a precedent, loss of property value, etc) were also raised.

6.6. Purley and Woodcote Residents Association objected to the application, raising the following (summarised) planning related concerns:

- Overdevelopment of the site;
- Out of keeping with the locality and surrounding townscape, as a result of its massing, form, and overall design / appearance.
- The density of buildings on the site results in minimal and insufficient amenity space for future occupiers.
- Poor configuration and size of proposed flats due to the proposal attempt to minimise overlooking (within the development and for neighbours) and minimise loss the trees.
- Detrimental to the amenity of occupiers of adjoining properties such as visual intrusion, increased noise and loss of privacy.
- Inadequate car parking would result in additional on-street parking, putting parking pressure on the surrounding area, and
- Increasing traffic movements would endanger road safety
- Loss of a further two family homes

## **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. Such determination shall be made in accordance with the Plan unless material considerations indicate otherwise. The Council's adopted Development Plan consists of the Consolidated London Plan 2016, the Croydon Local Plan (February 2018), and the South London Waste Plan 2012.

7.2. Government Guidance is contained in the National Planning Policy Framework (NPPF) revised in February 2019. 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;
- Delivery of housing
- Promoting social, recreational and cultural facilities and services the community needs
- Requiring good design.

7.3. The main policy considerations raised by the application that the Committee are required to consider are:

### **7.4. Consolidated London Plan 2016**

- 3.3 Increasing housing supply
- 3.4 Optimising housing potential
- 3.5 Quality and design of housing developments
- 3.8 Housing choice
- 3.9 Mixed and balanced communities

- 5.1 Climate change mitigation
- 5.2 Minimising carbon dioxide emissions
- 5.3 Sustainable design and construction
- 5.7 Renewable energy
- 5.10 Urban greening
- 5.12 Flood risk management
- 5.13 Sustainable drainage
- 5.14 Water quality and wastewater infrastructure
- 5.15 Water use and supplies
- 5.16 Waste net self sufficiency
- 5.18 Construction, Demolition and excavation waste
- 6.3 Effects of development on transport capacity
- 6.9 Cycling
- 6.10 Walking
- 6.11 Smoothing traffic flow and tackling congestion
- 6.12 Road Network Capacity
- 6.13 Parking
- 7.6 Architecture
- 8.3 Community infrastructure levy

#### 7.5. Croydon Local Plan (adopted February 2018)

- SP1 – The places of Croydon
- 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
- DM24 – Land contamination
- DM25 – Sustainable drainage systems and reducing flood risk
- SP7 – Green Grid
- DM27 – Biodiversity
- DM28 – Trees
- SP8 – Transport and Communications
- DM29 – Promoting sustainable travel and reducing congestion
- DM30 – Car and cycle parking in new development
- DM43 – Sanderstead

- 7.6. Suburban Design Guide Supplementary Planning Document (SPD) 2019
- 7.7. The SPD is a Housing Design Guide that provides guidance on suburban residential developments and extensions and alterations to existing homes across the borough. The SPD is a design guide for suburban developments likely to occur on windfall sites where existing homes are to be redeveloped to provide for several homes or proposals for building homes in rear gardens.
- 7.8. Other relevant Supplementary Planning Guidance as follows:
- London Housing SPG, March 2016
  - National Technical Housing Standards, 2015
  - National Planning Practice Guidance

## **8. MATERIAL PLANNING CONSIDERATIONS**

- 8.1. The principal issues of this particular application relate to:

- A. The principle of the development
- B. Affordable Housing and Housing Mix
- C. The Design of the Proposal and its Impact on the Character of the Area
- D. The Quality of the Proposed Residential Accommodation
- E. Impact on Neighbouring Amenity
- F. Impact on Highways, Parking and Refuse Provision
- G. Impacts on Trees and Ecology
- H. Sustainability and Environment
- I. Other matters
- J. Planning Obligations

### The Principle of Development

- 8.2. Proposed Land Use: Paragraph 11 of the NPPF 2018 applies a presumption in favour of sustainable development which means approving development proposal which accords with an up-to-date development plan without delay. Paragraph 68 acknowledges the contribution of small and medium size sites can make in meeting the housing requirements and supports the development of windfall sites.
- 8.3. The above policies are clearly echoed within Policy SP2.1 of the Croydon Local Plan (2018) (CLP 2018) while Policy SP2.2 commits to the delivery of 10,060 homes across the borough's windfall sites.
- 8.4. The site is a windfall site which could be suitable for sensitive renewal and intensification. The proposal is for a residential scheme within a residential area; it would comprise three building to accommodate 44 flats which would accord with the above national and local policies. Accordingly, the proposed land use would be acceptable in principle.

- 8.5. Loss of Existing Land Use: Policy DM1.2 of the CLP (2018) permits residential redevelopment where it would not result in the net loss of three-bedroom homes or the loss of homes smaller than 130 sqm. The proposal would provide six three-bedroom flats following the demolition of two family homes. Accordingly, it would not result in a net loss of three-bedroom homes the proposal would be acceptable.
- 8.6. Density: The site falls in an urban setting and has a PTAL score of 4. Table 3.2 of The London Plan identifies a density of 200-700 habitable rooms/ha and 45/185 units/ha as being appropriate. The proposal would result in a density of 508 hr/ha and 183 u/ha. Accordingly, the density of the proposal would be in line with the optimum matrix set by the London Plan (2016) and the proposal would be acceptable.
- 8.7. In summary, the proposed residential use and its density would be acceptable in principle. The proposal would accord with the National and Local requirements and would optimise the delivery of additional housing in the borough.

#### Affordable Housing and Housing Mix:

- 8.9. Affordable Housing: Policy SP2 of the CLP (2018) states that to deliver affordable housing in the Borough on sites of ten or more dwellings, the Council will negotiate to achieve up to 50% affordable housing, subject to viability and will seek a 60:40 ratio between affordable rents homes and intermediate (including shared ownership) homes unless there is an agreement with a Registered Provider that a different tenure split is justified. CLP Policy SP2.5 requires a minimum provision of affordable housing to be provided preferably as a minimum level of 30% affordable housing on the same site as the proposed development.
- 8.10. A full viability appraisal, prepared by Arebray Development Consultancy (ADC), accompanied the submitted documents for the planning application. During the course of the application, the applicant explained that they were in discussion with a Registered Provider (RP), Optivo, to take on the whole development. The RP, as a developer would offer to provide the whole of Andrews East block, 11 units (25%), as affordable housing, with a tenure split of 60:40 ratio between shared ownership and affordable rent. This block comprises two x 1-bedroom flats, eight x two-bedroom flats and one three-bedroom flat.
- 8.11. The Council's third party assessors, HCA DAT, carried out their own appraisal to the scheme; carried out different scenarios, including a scenario for the applicant's offer. HCA DAT advice was that the scheme could achieve the proposed 25% affordable housing within Andrew East with a 60:40 ratio between affordable rent and intermediate homes in addition to a surplus of £66,714 which would accord with policy SP2.4.
- 8.12. The Council's Housing Advisor agreed with the third party assessor finding and added that the applicant could agree to provide further units to achieve 30% onsite affordable housing and avoid a review mechanism at a later date in the development. The applicant agreed to this term and offered an additional three-bed unit as affordable rent within Hunt block.

- 8.13. In summary, the final agreed offer would be 30% affordable housing, from which would be 59% affordable rent and 41% shared ownership per habitable rooms. This would be in accordance the Policies SP2.4 and SP2.5 of the CLP (2018).
- 8.15. Housing Mix: Policy SP2.7 of the CLP (2018) seeks to ensure that a choice of homes is available to address the borough's need for homes of different sizes and that this will be achieved by setting a strategic target for 30% of all new homes up to 2036 to have three or more bedrooms. Policy DM1.1 of the CLP (2018) requires a minimum provision of homes designed with three or more bedrooms on sites of 10 or more dwellings. In suburban settings with PTAL 4 or above, the requirement would be 60% three or more bedroom units. The policy goes on to say that within three years of the adoption of the plan, where a viability assessment demonstrates that larger homes would not be viable, an element may be substituted by two-bedroom (four person) homes.
- 8.16. The proposal of 44 units would have the following mix of dwelling:

Unit size	Proposed Number	Percentage
<b>1-bed/2-persons</b>	13	30 %
<b>2-bed/3-persons</b>	10	22 %
<b>2-bed/4-persons</b>	15	34 %
<b>3-bed/4-person</b>	6	13 %
<b>Total</b>	44	100%

- 8.17. The proposal would provide 47% of three-bedroom and large two-bedroom units. However, Policy DM1.1 sets an exception for a change in mix where there is an agreement with an affordable housing provider that three or more bedroom dwellings are neither viable nor needed. As per the previous section, the applicant has an agreement with an RP to take over the whole development and agreed the final provision of the family units. Accordingly, the proposed unit mix would be acceptable and in line with Policies SP2.7 and DM1.1.

### The Design of the Proposal and its Impact on the Character of the Area

#### ***i. Pattern and Layout:***

- 8.33. Policy DM.10 of the CLP (2018) states that proposals should be of high quality, respect the development pattern, layout and siting. The proposal would comprise one building onto Grovelands Road, Hunt block, and two buildings to its rear, Andrew East and Andrew West blocks. Hunt block would follow the existing front building line and would sit towards the east corner of the plot. Andrew blocks would be parallel to the angled lines of the rear edge of the site creating an irregular shaped area between the three buildings with widths ranging from 14 to 20 metres comprising pathways, landscaped communal amenity area, children's play area and private amenity spaces to ground floor units.



8.34. The proposal would utilise the site's topography to form basement levels to accommodate vehicle parking, cycle parking and bin stores. The vehicle car parks would sit below Hunt and Andrew West blocks with access from the public highway. Hunt's car park would have a direct access-ramp from the front of the development. Andrew's car park and pedestrian entrance would be along the side of the Hunt block, providing a sense of arrival to the development and creating a legible separation between the public highway and the private development. The decision notice would contain a condition for landscape details to be submitted to ensure a high quality level of the landscaped areas.

8.35. **Fig. 3: Proposed Site Plan.**



8.36. Considering all the points raised above, the proposal would provide a high-quality public realm with a comprehensive layout, clear, well defined public and private spaces. The proposed vehicle and cycle parking at basement levels would not cause an undue impact on the appearance of the area. Accordingly, the proposed pattern and layout would be acceptable and in line with DM10.

## ii. Scale and Height:

8.36. Policy DM.10 of the CLP (2018) states that proposals should be of high quality, seeking to achieve a minimum height of 3 storeys and should respect...the scale, height, massing, and density.

8.37. Figure 2.10c from Policy 2.10 of the Suburban Design Guide SPD (2019) (SDG (2019)) states that: *Where surrounding buildings are predominantly detached dwellings of two (2) or more storeys, new developments may be three (3) storeys with an additional floor contained within the roof space or set back from the building envelope below.* Figure 2.10d of the same policy states that:

*'Where surrounding buildings are predominantly single storey, new development should seek to accommodate a third storey within the roof space'*

8.38. **Fig. 4:** Figure 2.10c and Figure 2.10d of the SDG (2019).



8.39. The proposal sits at the middle of a steep hill which rises towards the west side of Grovelands Road. This road comprises detached dwellinghouses with two and three storeys. The immediate neighbours on Grovelands Road are a detached bungalow and a two-storey detached dwellings to the east and west respectively. The site has a steep topography, making a valley of its southeast corner with a slope steepness of 16% upwards to the northwest corner. The site also has a difference of 3.8 metres in height between the southeast and the southwest corners. This difference in height is consistent along the streetscene and provides a gradual increase of one-to-two stories along Grovelands Road.

8.40. **Fig.5:** Height comparison for Hunt block:



8.41. Objection letters raised concerns of the proposed five- and four-storey height and its impact on the character of the area. However, the recommendations of the SDG (2019), mentioned above, combined with the streetscene steep setup would deem a height of four storeys above ground level acceptable.

8.42. Hunt block would appear as two entities divided by a four-storey, glazed section above the main entrance. The difference between their base points would stipulate this division; the east entity would comprise the basement vehicular access, appearing as five-storeys and the west entity would step back and sit on a higher topography with a full height of four-storeys. Each entity would have a width equal or even less than existing single family dwellings within the streetscene. Furthermore, the top floor of this building would be pushed back, would have different materials to the bottom floors and would not form a visual part of the main building.

8.43. **Fig.6:** West side view of Hunt Block



8.44. Andrew blocks to the rear of the site would have a height of three-storey above excavated ground level. Due to the steepness of the site, a part of Andrew West building would be two storeys above ground level. Furthermore, the top floor would be set from the edges reducing the overall mass and bulk of the proposal.

8.45. Objection letters raised a concern that the proposal would be overbearing to the setting of St Swithuns Church. This church is not listed and its setting does not warrant preservation. Furthermore, due to the difference in height across the wider area, the proposal would not be over dominant, or materially higher than the church building as shown at Fig.3 below.

8.46. **Fig. 7:** The development from the junction of Grovelands Rd and Downing Rd.



8.47. Considering all the points raised above, the overall scale, mass and height of the proposal would be appropriate to its setting, would be acceptable and in line with DM10.

**iii. Design and Materials:**

8.47. Paragraph 127 of the NPPF states that: '*Planning policies and decisions should ensure that developments...are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities)*'.

- 8.48. Policy DM.10 of the CLP (2018) states that proposals should respect the appearance, existing materials and built and natural features of the surrounding area.
- 8.49. Objection letters raised concerns with the modern design if the development being out of character with the area. Officers agree it would be different; however, planning should not discourage innovation or change as per the NPPF. Additionally, the character of the vicinity comprises a mix of architecture styles: albeit most of the buildings are traditional dwellinghouses, they lack an architecture cohesion whereby the development should to follow its merits.
- 8.50. The proposed front building line maintained a consistent offset from the pavement similar to other properties on the road. This setback allowed for landscaping to the front of the development which would follow a general characteristic of the area and would have a positive impact on the streetscene. The proposal comprises three buildings of similar plot size, appearance, materials, fenestration and architecture lines rhythm. The architecture style for the development would be modern with sleek lines using a minimum number of materials. All buildings would have protruding elements, in contrast to the stepped-in balconies, which would add richness to its articulation. Furthermore, the proposal on its own merits would form a cohesive group of buildings in that section of the road, which would enrich the character of the area.
- 8.51. The proposed materials would consist of three main elements as a nod to existing materials in the vicinity: light colour brick, black metal frames at the main parts of the buildings and a rendered/cladded top floors. This palette of materials would complement the proposed soft landscaping and the hardscaping needed for the driveway and pathways.
- 8.52. Considering all the points raised above, the overall scale, mass and height of the proposal would be appropriate to its setting, would be acceptable and in line with DM10.

#### The Quality of the Proposed Residential Accommodation

- 8.18. Internal Areas: Policy SP2.8 of the CLP (2018) states that the Council would require new homes to achieve the minimum standards set out in the Mayor of London Housing Supplementary Planning Guidance (SPG) and National Technical Standards (2015) (NTS (2015)) or equivalent.
- 8.19. The proposed layout for the scheme would provide a legible development for the benefit of the end user. Each building would have one service core which would serve up to five units. The proposal would comprise single-floor units across three buildings with a mix of one- , two- and three-bedroom units. All units would achieve or exceed their minimum or respective sizes as set out in the NTS (2015).
- 8.20. All proposed internal rooms within each unit would have an appropriate size respective to its end-user. Additionally, the distribution of the scheme across medium-size blocks would result in all units, except for one south-facing unit, having a dual aspect across the scheme.
- 8.21. Guidance 2.9 of the SDG (2019) states that new to new dwellings' separation distance should be 12 metres. The proposed layout, the alignment of the proposed blocks along the boundary edges would result in appropriate



separation distances between the units of opposite blocks. The smallest distance between Hunt and Andrew East would be 13 metres, and the smallest distance between Andrew West and the corner of Hunt would be approximately 15 metres.

- 8.22. Considering the above, the proposed accommodation would be acceptable in accordance with Policy SP2.8.
- 8.23. Accessibility: London Housing SPG (2015) states that 90% of new-build housing should meet Building Regulation requirement M4(2) 'Accessible and Adaptable Dwellings' with the remaining 10% meeting Building Regulation requirement M4(3) 'Wheelchair User Dwellings'. Policy SP2.8 of the CLP (2018) states that the Council would ensure that new homes in Croydon meet the needs of residents over a lifetime.
- 8.24. Each block core would have a lift, all distribution corridors and units would maintain a step-free access which would allow all units to be adaptable in accordance with M4(2) which requires a step-free access to the WC and other accommodation within the entrance storey of any unit.
- 8.25. Further to the above, the amended drawings identified the eight wheelchair user dwellings and five disabled car parking spaces. These units would be one-, two- and three-bedroom units; their drawings included furniture, wheelchair-turning circles and wheelchair-user bathrooms to prove their function and usability as M4(3) units. This would be in excess of the minimum policy requirement and is a positive element of the scheme.
- 8.26. Considering the above, the proposal would provide sufficient number of wheelchair user dwellings in addition to providing fully future adaptable dwellings across the scheme in accordance with the London Housing SPD (2015)

### ***iii. Amenity Areas and Play Space:***

- 8.26. Policy DM10.4 of the CLP (2018) states that all new residential development will need to provide private amenity space, this space should be functional with minimum depth of 1.5 metres and a minimum area of 5 sqm per 1-2 person unit and an extra 1 sqm per extra occupant thereafter.
- 8.27. Most of the proposed units would have a minimum of 5 sqm, for one-bedroom units, which would increase depending on each unit's location within the floor plan, and the articulation of the design, and would be in accordance with Policy DM10.4.
- 8.28. Policy DM10.4 also states that all flatted developments must provide a minimum of 10 sqm per child of new play space as set out in Table 6.2, this calculation will be based on an agreement in principle on the amount of affordable housing. All units provide sufficient private amenity space.
- 8.29. The Council reached an agreement with the developer regarding the amount of onsite affordable housing, as per Section 10A above. The calculations in accordance with Table 6.2 concludes that 100.4 sqm would be required as play space for the scheme. The proposal would provide a net area of 113 sqm for

play space, in addition to 203 sqm of net additional space to be used as communal amenity for future occupiers.



- 8.31. Considering the above, the proposal would provide adequate amenity and play space for the future occupiers in accordance with Policy DM10.4.
- 8.32. In summary, the proposal would provide adequate, sustainable accommodation for future occupiers in terms of legibility, unit size, habitable room's adequacy, private and communal amenity spaces in accordance with London Housing SPG (2015) and Croydon Local Plan Policies SP2 and DM10.

## Impact on Neighbouring Amenity

- 8.33. Policy DM10.6 of the CLP (2018) states that the Council will ensure proposals would protect the amenity of occupiers of adjoining buildings and that proposals will not result in direct overlooking into their habitable rooms or private outdoor space and not result in significant loss of existing sunlight or daylight levels.
- 8.34. Guidance 2.9 of the SDG (2019) states that careful design can mitigate the inevitable increase in overlooking and impact on the outlook occurring from developments and the evolution of the suburbs. Adding that a greater level of protection will be given to the first 10 metres of a neighbouring garden, and that the design should present obscure, diagonal or oblique views if overlooking onto this space occurs.
- 8.35. Guidance 2.9 of the SDG (2019) discusses massing and relationship between buildings. It states that there should be 18 metres between a new and existing third party dwelling. This distance was quoted to prevent overlooking; however can be used as a guideline for overbearing impact.

- 8.36. Paragraph 2.9.1 of the SDG (2019) states that when considering the relationship with other built form, applicants should ensure that there is not unreasonable loss of light for neighbours.
- 8.37. The assessment of the design of the proposal concluded that the elevations would provide attractive development. Furthermore, the change in land levels across the site would result in a low overall height across the development: submitted drawings show the development being in line with or marginally exceeding the height of the adjoining two-storey dwellings. This would reduce any potential overbearing impact on neighbouring properties as per the following assessment for adjoining properties.
- 8.38. **Fig. 9:** Height comparison with adjoining properties:

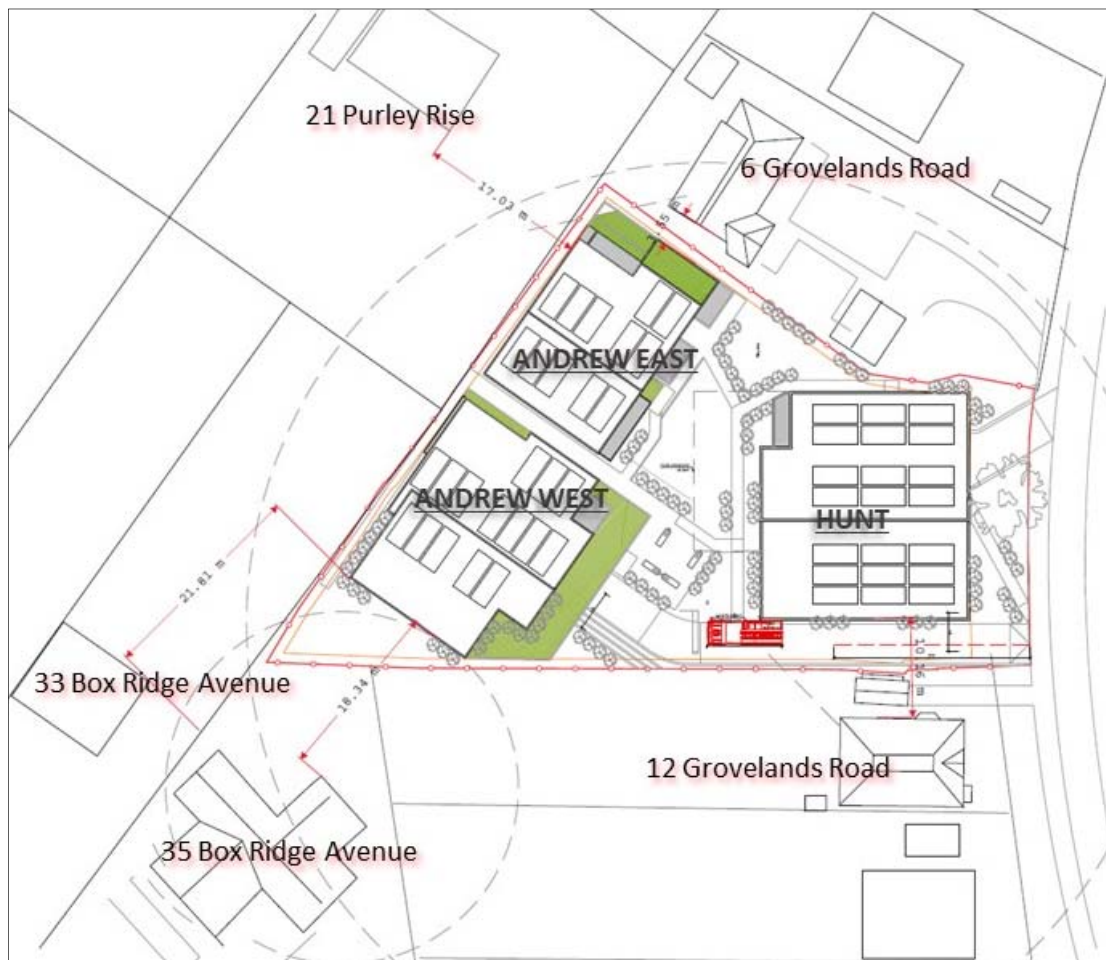


- 8.39. The site is adjoining the following properties, each will be assessed accordingly:
- No. 6 Grovelands Road** along its east boundary; the site is adjacent to a detached building, the front garden and the side of the property, the dwelling would site a separation distance of 3.5 metres from the side of Andrew East block.
  - No. 12 Grovelands Road** along its west boundary; the site is adjacent to the garage and its driveway and the dwelling would have a separation distance of 10 metres from the Hunt block.
  - No. 35 Box Ridge Avenue** to the northwest corner; the site is adjacent to the end of their angled-edge of the rear garden, the dwelling would sit at a separation distance of 23 metres from Andrew West block.
  - No. 33 Box Ridge Avenue** along the north boundary; this dwelling is set 7.5 metres from the shared boundary and would have a separation distance of 20 metres from the northwest corner of Andrew West block.
  - No. 21 Purley Rise** along the north boundary; the site is adjacent to the side / rear garden of this property and the dwelling would sit at a distance of 17 metres from the rear edge of Andrew East block's ground floor. However,



due to the siting of the two buildings and the upper floors setback on Andrew East, the actual distance between the side wall of No.21 and the proposed parallel wall would be 24 metres.

8.40. **Fig. 10:** The adjoining properties for the site:



**i. No.6 Grovelands Road:**

- 8.41. Overlooking: Hunt Block would align along the front garden of this property and Andrew East block would run along its side wall; both blocks would not have direct overlooking onto its internal spaces. Additionally, Andrew East's first-floor, and subsequent upper floors, would be setback at each level making a bigger separation with the small private rear amenity of this adjoining property, all upper floor windows are angled with diagonal views on this space. Furthermore, most windows towards this private space would be for non-habitable rooms and can be made obscure via a condition.
- 8.42. Noted that this property has fencing around its front garden which might indicate its use as their private amenity. The proposal would not have building blocks parallel to this space and the proposed landscape would have some five-metres-tall trees along with a two-metres array of trees along this edge. Accordingly, the proposal would not be considered to have an adverse overlooking onto this adjoining property.
- 8.43. Overbearing Impact: The submitted drawings show that Andrew East block upper floors would be setback to avoid any encroachment to the 45° line of the

nearest rear, upper-floor window of this property. Accordingly, the proposal would not result in an overbearing impact on its residents.

- 8.44. Loss of Sunlight and Daylight: The location of this property to the east of the proposal would normally protect it from a significant loss of sunlight and daylight; this property also does not have any side windows overlooking the site. Any impact from Hunt block would occur at late afternoons during the peak of summer, and any impact from Andrew East block would occur after 3 pm during winter months, which would be acceptable.

***ii. No.12 Grovelands Road:***

- 8.45. Overlooking: The proposal would align with the side wall of this property and would not have any direct overlooking onto its internal spaces. Officers note the presence of a ground floor bay window at number 12 overlooking the site, however this window is impacted by their existing garage which would provide some element of screening. Additionally, the proposed upper floor side windows would be have obscured and diagonal views at a distance of approximately 15 metres from this secondary window.
- 8.46. Hunt block upper floors side windows would have an element of overlooking onto their private amenity. However, the proposal would have obscured and diagonal, oblique views onto this private amenity with a separation distance of 10 metres. The combined factors of distance and angled view would be sufficient to disperse direct overlooking which would be acceptable.
- 8.47. Andrew West's front elevation (the block to the rear) would be approximately 33m from the rear elevation of 12 Grovelands Road, sufficient distance to ensure no loss of privacy to rear windows. It would therefore be 23 metres from the rear edge of their private amenity space protected by policy. This distance would be considered sufficient to avoid any overlooking impact onto this property and its amenity.
- 8.48. Overbearing Impact: The submitted drawings show that Hunt block would not be within the 45<sup>0</sup> line of nearest upper-floor window of this property. Accordingly, the proposal would not result in an overbearing impact on its residents.
- 8.49. Loss of Sunlight and Daylight: As per figure 5 above, the Hunt block would sit at a distance of 10 metres from this property with the closest height of 8 metres. The online sun path assessment showed that the Hunt block would only impact the private amenity of this property in the early sun hours during winter time which would be acceptable.

***iii. Nos.33 & No.35 Box Ridge Avenue:***

- 8.50. Overlooking: The change in height across the site would result in the fourth floor of Andrew West building being at a single-storey level when compared with this neighbouring property. Additionally, the corner of this proposed block would sit at a distance of 18 metres and 22 metres from Nos. 35 and 33 respectively. The combined factors of separation distances, single-storey appearance of the proposal and normal fencing around the development would result in lack of overlooking impact onto this adjoining property.

- 8.51. Overbearing Impact: As per figure 5 above, Andrew West block would sit at a distance of 18 metres and 22 metres from Nos. 35 and 33 respectively. Furthermore, this proposed block would have a height of single-storey when compared with these two adjoining properties. Accordingly, the separation distance and the overall height would result in lack of overbearing impact onto these adjoining properties.
- 8.52. Loss of Sunlight and Daylight: As per figure 5 above, Andrew West block would sit at a distance of 19 metres and 22 metres from Nos. 35 and 33 respectively. The online sun path assessment concluded that Andrew West block, at a height of 4.5 metres by the closest boundary, would impact the rear gardens of these properties during the winter months before 10 am, which would be acceptable.

***iv. No.21 Purley Rise:***

- 8.53. Overlooking: Andrew East block would have the rear façade adjacent to the side boundary of this property. 21 has side facing principal fenestration at a distance of 17m from the proposal. There is not however direct overlooking as the section of the proposed building opposite this fenestration does not have any windows in it. As such the impact on the privacy of this unit internally is acceptable. it would appear that the amenity space to the side of 21 is well used and there would be some mutual overlooking of this space. Considering that the property also benefits from a large rear garden area directly behind the house, which would be 17m from the proposed elevation, and so not directly overlooked, this relationship is on balance acceptable.
- 8.54. Overbearing Impact: Andrew East block would sit at a distance of 18 metres or more along the 45<sup>0</sup> line of the rear windows of this property. This distance would be sufficient to overcome any overbearing concerns, particularly considering the replacement trees / hedge which would be conditioned along this boundary to overcome potential privacy impact.
- 8.55. Loss of Sunlight and Daylight: Andrew East block would sit at a distance of 18 metres from the sidewall of this property, and its maximum closest height would be 5.8 metres. Accordingly, any shadow resulting from this block would not result in a significant loss to the sun and daylight of the main part of the private amenity of this property. Furthermore, this 18 metres separation area would suffer a loss of sun and daylight at the later hours within summer months only.
- 8.56. The application did not include a professional sunlight and daylight assessment onto neighbouring properties. The combined factors of separation distances from the neighbouring properties, in addition to the site's changing contour levels and lack of direct windows facing the site, deemed a lack of need for such assessment. However, the application included an online assessment for properties Nos. 6 and 12 Grovelands Road. Officers are satisfied that the proposal would not result in loss of sunlight and daylight to adjoining properties as per the following assessment.
- 8.57. In summary, the proposal would not result in a significant adverse impact on adjoining neighbouring properties in terms of loss of privacy, overbearing impact or loss of sun and daylight, as per Croydon Local Plan (2018) Policy DM10.6 and the Croydon Supplementary Guidance (2019).

### Impact on Highways, Parking Provision and Waste Management

- 8.77. Highway Safety: Policy DM30 of the CLP (2018) states sustainable growth in Croydon would require new developments to ensure movement of pedestrians, cycles and emergency services is not impeded by the provision of car parking.
- 8.78. The site falls on a residential road and has two vehicular access serving the existing two dwellinghouses. The proposed vehicular access to the west corner of the site would have increased level of activity resulting from the 15-vehicles car park, the waste and recycling collection vehicle and pedestrian movement mainly associated with the residents of the two Andrew blocks. Following discussions with the Council's Strategic Transport Officer, the proposed amended plans modified the access to include appropriate visibility splays for the kerb users; in addition to ensuring that it would have sufficient width to accommodate a vehicle turning-in and a vehicle turning-out of site without disrupting movements on Grovelands Road.
- 8.79. The proposed access to the Hunt block car park was also amended to have a 90° angle with the public highway and ensure that both drivers and pedestrians would have appropriate visibility splays.
- 8.80. Further to the above, the application included a Construction Logistics Plan to ensure minimum disruption to the public highway. The Council's Network Impact Assessment Engineer reviewed the submitted details and requested some amendments which were incorporated within the final received plan. The decision notice would include a compliance condition for the approved document.
- 8.81. Considering all the above, and as per the advice sought from the Council's specialist officer and engineer, the proposal would not harm the adjoining public highway or the safety of its users.
- 8.82. Vehicle Parking: Policy DM30 of the CLP (2018) states sustainable growth in Croydon would require new development to reduce the impact of car parking in any development located in areas of good public transport accessibility or areas of existing on-street parking stress and provide car and cycle parking spaces as set out in Table 10.1. This table states that developments in areas of good public transport accessibility should aim for significantly less than 1 space per unit. It also states that adequate parking spaces for disabled people must be provided preferably onsite.
- 8.83. The proposal would have 31 vehicle parking spaces, these would include five disabled car parking bays, divided across two car parks. The first 16 spaces would sit beneath Hunt Block with direct access the main road; the remaining 15 spaces would sit beneath Andrew West block and accessed through the vehicular/pedestrian access to the west front corner of the site. This would amount to 70% provision to the proposed 44 units or a provision to each of the two- and three-bedroom units.
- 8.84. The eastern edge of the site falls within PTAL 4 zone, the submitted PTAL spreadsheet concluded that the site has a very good access to public transport links and falls within a reasonable walking distance of local bus stops, Reedham station, Purley Town Centre and local amenities. The parking stress survey concluded that the overnight levels are below 50% and peak levels within

Grovelands Road are limited to 41% which indicates that the area has an ample on-street-parking capacity. Considering these factors and the S106 financial contribution towards a car club space, the proposed parking provision would be acceptable.

- 8.85. Table 10.1 of the CLP (2018) states that major developments should enable the future provision of electric charging points and parking bays for electric vehicles. The proposal would have electric charging points for 14 spaces (45%) and the decision notice would include a condition to ensure passive electric charging points ready for future installation across the remainder of spaces.
- 8.86. Considering all above, and as per the advice sought from the Council's Strategic Transport officer, the proposed vehicle parking levels, its layout and access would be acceptable.
- 8.89. Cycle Parking: Table 6.3 of The London Plan (2016) sets the cycle parking standards at one space per one-bedroom units and two spaces for all other bigger units; it also required major developments to have one space per 40 units for short stay. The proposed mix would require a total of 74 spaces and two short stay spaces. The proposal would have a total of 89 spaces, 72 spaces within the main store beneath Andrew East block, six spaces within the car park beneath Andrew West block and four within the car park for Hunt block, in addition to nine racks for short stay along the vehicular access. This provision would exceed the requirements of the London plan and would provide accessible storage for future occupiers of the development.
- 8.90. Considering all above, and as per the advice sought from the Council's Strategic Transport officer, the proposed cycle parking levels, its layout and access would be acceptable.
- 8.91. Waste Management: Policy DM13 of the CLP (2018) aims to ensure that the location and design of refuse and recycling facilities are treated as an integral element of the overall design and the Council would require developments to provide safe, conveniently located and easily accessible facilities for occupants, operatives and their vehicles.
- 8.92. The proposal went through some amendments to ensure that the proposed facility are adequate in size and location. The proposal would have the following provision:
- A refuse store within the car park beneath the Hunt block. This store would serve Hunt block residents, through a direct access from the core, and it would have a general large items storage for all the residents of the development. This refuse store would cater for wheelchair users; it would have a two-metres separation distance between the bins and low level recycling and waste bins for ease of movement and access. The collection vehicle would park on the public highway and would use the proposed gradient level of 1:16 to access the car park then the refuse store.
  - A refuse store on ground level to the side of Andrew East block. This store would have a linear shape and sliding doors, with bins aligned along the wall. It would serve residents of Andrew East and Andrew West blocks with a carrying distance of 22 and 19 metres respectively. The collection vehicle would reverse within the proposed vehicular access and the bins would be dragged down to collection point.

- 8.93. The proposed waste management strategy for Andrew East store would exceed the Council's requirement for bin drag distance. Accordingly, the proposal would depend on private collection service. Section 106 agreement would include a term to dismiss the Council from their responsibility of waste collection onsite.
- 8.94. In summary, the proposal's parking provision, vehicular movement and servicing of the proposed development would not result in a significant adverse impact on adjoining highway and its operation in terms of safety, significant increment to existing on-street parking as per the London Plan (2016) and Croydon Local Plan (2018) Policies DM13 and DM30.

#### Impacts on Trees and Ecology

- 8.95. Trees: Policy DM10.8 of the CLP (2018) states that: *'In exceptional circumstances where the loss of mature trees is outweighed by the benefits of a development, those trees lost shall be replaced with new semi-mature trees of a commensurate species, scale and form.'* Policy DM28 of the CLP (2019) states that the Council will seek to protect and enhance the borough's trees and hedgerows, adding that a condition require replacement of removed trees will be imposed and those replacement trees should meet the requirement of DM10.8.
- 8.96. The site comprises two extensive gardens with several mature trees, none of the existing trees are protected by a Tree Protection Order (TPO). Policy DM28 recognises that trees are only one consideration when addressing the competing needs of development and agrees that replacement semi-mature trees of commensurate species, scale and form can mitigate the loss of existing trees.
- 8.97. The application included a BS5837 compliant Arboricultural Assessment Report which considered the effect of the proposed development on the local character, from a tree point of view. This report identified five moderate Category B trees and concluded that the rest of the trees on site are either low Category C or the unretainable Category U. This report included a method statement to outline the way in which the retained trees, particularly those outside the site and within a proximity to the boundary, would be protected and managed during the demolition and construction processes. The decision notice would include a condition to ensure the development following the methodology of this report.
- 8.98. The scheme would propose the planting of nine 'Heavy-standard' trees with heights of 3.5 to 5 metres, and 30 'Select- Standard' trees with height of 2 metres. The proposal would have 29 trees removed from site and would propose a total of 36 trees, in addition to extensive hedging and shrubbery. One tree in particular of Category B sits at the front of the site and would have a replacement in the same location.
- 8.99. Objection letters raised concerns to the tree identified as T19 stating that this tree was in a good condition. These letters also contested the ownership of the tree and stated that the tree was in shared ownership between No.8 and No.21 Purley Rise. The ownership of the tree is a civil and not a planning matter,

notwithstanding that, the case officer's site visit and the tree officer's site visit confirmed that the tree appeared to originally growing within the boundary of No.8 Grovelands Road and throughout time it passed the shared fence onto No.21 Purely Rise. Furthermore, the Council specialist officer agreed with the categorisation of the tree and its replacement as part of the development.

- 8.100. Accordingly, the development would propose trees replacing those removed as a result of the proposal, the number of proposed trees would exceed the number of removed trees and its stature would accord with the requirement of policy DM10 and would be acceptable.
- 8.101. Ecology: Policy DM27 of the CLP (2018) states that developments should have no adverse impact on land with biodiversity or geo-diversity value as designated on the Policies Map and have no adverse impact on species of animal or plant or their habitat protected under British or European law, or when the Council is presented with evidence that a protected species would be affected.
- 8.102. The site is not subject to any statutory or non-statutory designations. The application incorporated a Preliminary Ecological Assessment which concluded that the site did not support any features which would contribute to its designation. However, it found that the site had value to wildlife and a potential to support bat and breeding birds. Accordingly, it recommended carrying out bat surveys to determine their presence onsite and a precautionary approach to vegetation clearance for breeding birds and reptiles, to minimise any adverse impact on these species groups. The decision notice would include a condition to accord with the recommendations set out in the submitted ecological assessment.
- 8.103. A Bat Survey was carried out, as per the recommendations of the Preliminary Ecological Assessment, and its area extended over the existing buildings, hardstanding areas, trees, hedges and shrubs on site. It comprised three bat activity surveys, which included two at dusk and one at dawn time. On two occasions (on the first dusk and the dawn surveys) a single common pipistrelle bat was seen emerging or re-entering the garage buildings, located between number 8 and number 10 Grovelands Road.
- 8.104. The Bat Survey concluded that bat roosts may be present in the garage buildings and that the development might result in their loss or disturbance. Accordingly, the development would require mitigation and compensation appropriate to the species present, roost type and status and the number of bats. The mitigation would include an EPSM Licence from Natural England to legally disturb and destroy any present bat roosts. The licence would include timing restrictions for certain aspects of the work and would ensure the presence of an ecologist on-site during certain phases of the work. Application for this licence would follow the grant of planning permission and the completion of relevant survey work; the decision notice would include a condition to ensure this license is obtained prior to the commencement of the development.
- 8.105. The mitigation strategy included roosting opportunities post-development, through the incorporation of bat bricks within the proposed blocks or bat boxes on walls and trees. In addition to tree and shrub planting and the installation of suitable bat lighting. The proposal would include replacement trees, shrubs and hedges; the decision notice would include a condition for bat roosting bricks or



boxes and the installation of bat-friendly lighting per the recommendations section of the Bat Survey.

- 8.106. In summary, the proposal would include replacement to the removed trees on site and would incorporate mitigation measures to reduce or avoid the impact on protected habitats on site as per Local Plan Policies DM10.8, DM27 and DM28.

### Sustainability and Environment

- 8.107. Sustainability and Energy Efficiency: Policy SP6.2 of the CLP (2018) states that the Council will ensure that development make the fullest contribution to minimising carbon dioxide emissions in accordance with the London Plan energy hierarchy to assist in meeting local, London Plan and national CO2 reduction targets.
- 8.108. The Council Sustainable Development & Energy Officer reviewed the submitted Energy Statement and agreed with its conclusions. The development would:
- Meet the 35% onsite reduction via fabric insulation, gas boilers and solar PV; and
  - Commit to a carbon offset payment of £60/tonne; calculated as: offset of 36.1 (tonne/year) x 30 (years) x £60/tonne = £64,980.00;
- 8.109. This carbon offset should be included within the S106 agreement, along with the Council's standard payment triggers of 50% on commencement, 50% on completion. The decision notice would also include a Condition to submit the 'as built' carbon performance (Dwelling Emission Rate), as calculated as part of the Building Regulations compliance. Along with submission of evidence of installation of the solar PV system (e.g. MCS Certificate or equivalent).
- 8.110. Policy SP6.3 of the CLP (2018) requires all new-build residential development to meet water efficiency standard of 110 litres/person/day as set out in Building Regulations Part G. The decision notice would include a condition to ensure the development would adhere to the standards of this policy.
- 8.111. Flooding and Sustainable Urban Drainage: The site falls outside areas with risk of flooding and surface water flooding as per the information provided on the Environmental Agency Flood Map. Policy DM25 of the CLP (2018) states that sustainable drainage systems (SuDS) are required in all development. This would ensure that sustainable management of surface water would not increase the peak of surface water run-off when compared to the baseline scenario.
- 8.112. The submitted SuDS management for the proposal would include permeable paving, rainwater harvesting, geocellular systems and proprietary treatment systems. These measures would accord with London Plan Policy 5.13 drainage hierarchy and would ensure that any surface water is discharged to combined sewer and avoid its impact onsite and adjoining areas. The decision notice would include a condition to ensure that the development would adhere to the mitigation measures raised within the submitted Surface Water Drainage Strategy and Flood Risk Assessment.

## **9. CONCLUSIONS**

- 9.1. The provision of 44 residential dwellings within the Borough is encouraged by the Council's Local Plan policies, national guidance in the NPPF and regional policies of the London Plan.
- 9.2. The proposal would provide 30% affordable housing with a mix of 60:40 ratio between London Affordable Rent and shared ownership.
- 9.3. The proposed site layout and design of the new building has had sufficient regard to the scale and massing, pattern and form of development in the area and to existing building, and would result in an appropriate scale of built form on this site.
- 9.4. The proposed development would result in the creation of modern residential units ensuring good standard of accommodation for future occupiers. The development has been designed to ensure that the amenity of existing local residents would not be compromised.
- 9.5. In addition, the development would be acceptable on highways, environmental and sustainability grounds as well as in respect of the proposed planning obligations.
- 9.6. All material considerations have been taken into account, including responses to the consultation. The conditions recommended and obligations secured by Section 106 would ensure that any impacts of the scheme are mitigated against and it is not considered that there is any material planning considerations in this case that would warrant a refusal of this application. Taking into account the consistency of the scheme with the Development Plan and weighing this against all other material planning considerations, the proposal is considered to be acceptable in planning policy terms.