

PART 5: Planning Applications for Decision

Item 5.2

1.0 SUMMARY OF APPLICATION DETAILS

Ref: 19/04350/FUL
 Location: Land To the Rear of 24-42 & 30 Moreton Road, South Croydon, CR2 7DL
 Ward: South Croydon
 Description: Demolition of existing dwelling. Construction of 31 no. apartments in two blocks, with associated parking, refuse stores, cycle stores and landscaping.
 Drawing Nos: RT319/0472/P/0001, SK/101, D/101 Rev A, D/102 Rev A, D/104 Rev A, D/105 Rev H, D/110, D/113 Rev C, D/126 Rev E, D/127 Rev E, D/128 Rev C, D/129 Rev C, D/132 Rev B, D/133 Rev C, D/134 Rev C, D/136, D/138, D/139, D/140 Rev B, D/141 Rev B, D01, D02, D03.
 Applicant: Mr Heath, Dawson Heath Property Limited
 Agent: N/A
 Case Officer: Samantha Dixon

	studio	1 bed	2 bed	3 bed	4 bed
Existing				1	
Proposed flats		6 (19%)	20 (65%)	5 (16%)	0

Affordable - 52% on site (16 London affordable rented units (1x1 bed and 15x2 bed)

Number of car parking spaces	Number of cycle parking spaces
16	62

1.1 This application is being reported to Planning Committee because the Ward Councillor (Councillor Gatland) has made a representation in accordance with the Committee Consideration Criteria and requested Committee consideration and objections above the threshold in the Committee Consideration Criteria have been received.

2.0 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 – 16 units (16 x London affordable rent)
- b) Local Employment and Training contributions
- c) Provision/contribution to car club space on street
- d) Travel Plan Monitoring
- d) Removal of future occupiers rights to a parking permit
- e) S278 Agreement for the implementation of the highway works
- f) Financial contribution towards air quality
- g) Carbon offsetting contribution
- h) Monitoring fee
- 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
3. Construction Logistics Plan to be submitted prior to any development on site.
4. Contaminated Land assessment to be submitted prior to any development on site.
5. Construction environmental management plan (biodiversity) to be submitted prior to any development on site.
6. Ecological Design Strategy for bats and reptiles to be submitted prior to any development on site.
7. SuDS condition as requested by LLFA
8. Piling Method Statement to be submitted and approved as required by Thames Water
9. Biodiversity enhancement strategy to be submitted prior to any above ground works.
10. Landscape and ecological management plan to be submitted prior to occupation
11. Wildlife sensitive lighting design scheme to be submitted prior to occupation
12. Details of screens to Unit 31 terrace to be submitted
13. Lighting of bin and bike stores, surface and under-croft parking areas to be submitted
14. Full details of cycle (for front block) and refuse storage to be submitted
15. Details of electric vehicle charging points to be submitted
16. Delivery and Servicing Plan to be submitted
17. Details of materials as submitted
18. Windows in northern elevation of Block C to be obscurely glazed and non-opening
19. East facing windows in Block A as shown on plans to be obscurely glazed and non-opening
20. Landscaping and children's play-space as submitted
21. Accordance with Tree Protection Plan
22. Inclusive access M4(2) and M4(3)
23. Car and cycle parking provided as specified
24. Car club space on street to be provided prior to occupation
25. No obstruction within visibility splays
26. In accordance with submitted Residential Green Travel Plan
27. Reinstatement of raised kerbs and verge where necessary
28. Groundwater flood resistance and resilience measures as submitted
29. 110 litre Water usage
30. Reduction in carbon dioxide by 35% beyond Building Regulations
31. Accord with mitigation and enhancement measures outlined in the submitted Ecological Surveys
32. Accord with mitigation outlined in Noise Assessment
33. 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 practise for Construction Sites
- 4) Light pollution
- 5) Requirement for ultra-low NOx boilers
- 6) Thames Water informative regarding groundwater discharge and water pressure
- 7) Network Rail requirements
- 8) Any other informative(s) considered necessary by the Director of Planning and Strategic Transport

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

2.5 That if by 23 April 2020 the legal agreement has not been completed, the Director of Planning and Strategic Transport is delegated authority to refuse planning permission.

3.0 PROPOSAL AND LOCATION DETAILS

3.1 The proposal includes the following:

- Demolition of the existing house
- Erection of three storey building at front of site to create 4 residential units and erection of a three/four/five storey building at rear to create 27 residential units (31 units in total) including 5x3 bedroom (16%), 20x2 bedroom (65%) and 6x1 bedroom (19%).
- Provision of communal external amenity space and children's play space
- Provision of 16 off-street parking spaces
- Provision of associated refuse and cycle stores

3.2 During the course of the application amended plans have been received. The main alterations to the scheme have been as follows:

- Alteration to the red site line. The plans originally included a narrow strip of trees to the north of the site. This strip has been removed and the area within the red line reduced in size. This alteration does not affect the proposed scheme in any way.
- Widening of two parallel parking bays
- Amendment to cycle parking



Fig 1: Proposed site plan

Site and Surroundings

- 3.3 30 Moreton Road is a two storey detached dwelling located to the west side of Moreton Road. The application site comprises this dwelling and its curtilage and a strip of land to the rear which runs to the rear of 24-42 Moreton Road. The land at the rear is currently landlocked with no direct access to it and is covered in trees and vegetation.
- 3.4 Directly to the west of the site is the railway line and to the north is Muggeridge Close, a cul-de-sac which contains a block of flats and associated car parking. The surrounding area is predominantly residential with a mix of flats and semi-detached and detached houses. It is located only 500 meters from a primary shopping area/local centre and has a PTAL of 3-4 and good connection to rail and bus routes. The site has potential for groundwater flooding to occur at the surface.



Fig 2. Aerial street view highlighting the proposed site in relation to adjacent properties

Planning History

- 3.4 19/00466/PRE: New Build Residential – Proposed construction of nine new dwelling houses with associated parking, cycle and refuse storage, landscaping. Reconfiguration and extension of 30 Moreton Road and construction of access driveway.
- 3.5 19/02145/PRE: New Build Residential - Proposed demolition of existing dwelling. Construction of 30no. apartments in two blocks, with associated parking, refuse stores, cycle stores and landscaping.

4.0 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 52% affordable housing in accordance with local plan requirements.
- The proposal includes a policy compliant number of family units.
- The massing, design and appearance of the development is appropriate, according 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 living standards of future occupiers are satisfactory (in terms of overall residential quality) and would comply with the Nationally Described Space Standard (NDSS).
- 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.

5.0 CONSULTATION RESPONSE

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

Lead Local Flood Authority (LLFA) (Statutory Consultee)

5.2 An objection to the development was initially received. Further information has now been received to address these concerns. The LLFA have now removed its objection and is satisfied that a detailed sustainable drainage scheme can be suitably secured through a condition (which is recommended).

Thames Water

5.3 The development is located within 15 meters of a strategic sewer and therefore a piling method statement is required to be submitted by condition. The developer will need to provide measures to minimise groundwater discharges into the public sewer and an informative is requested in this regard. No objection with regard to water, waste water network and sewage treatment works infrastructure capacity.

Network Rail (Statutory Consultee)

5.4 The applicant must ensure that their proposal, both during construction and after completion of works on site, does not:

- encroach onto Network Rail land
- affect the safety, operation or integrity of the company's railway and its infrastructure
- undermine its support zone
- damage the company's infrastructure
- place additional load on cuttings
- adversely affect any railway land or structure
- over-sail or encroach upon the air-space of any Network Rail land
- cause to obstruct or interfere with any works or proposed works or Network Rail development both now and in the future

The development must ensure that any future maintenance can be conducted solely on the applicant's land. Storm/surface water must not be discharged onto Network Rail's property or into Network Rail's culverts or drains except by agreement with Network Rail. Network Rail have also provided comment with regard to machinery, scaffolding, piling, fencing, lighting, noise and vibration and landscaping.

[Officer Comment: An informative notifying the applicant of Network Rail requirements will be attached to any permission granted].

6.0 LOCAL REPRESENTATION

6.1 The application has been publicised by way of 121 letters of notification to neighbouring properties in the vicinity of the application site. Site notices were also erected in the vicinity of the site and a press note published. The number of representations received

from neighbours in response to notification and publicity of the application are as follows:

No of individual responses: 14 Objecting: 14 Supporting: 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:

Objection	Officer comment
<i>Visual amenity</i>	
Overdevelopment of the site.	Addressed in Section 8.21 of this report.
Loss of family homes and too many flats destroys local character.	There are numerous existing flatted developments within close proximity to the application site.
Design – Out of keeping/obtrusive scale	Addressed in Sections 8.13 – 8.20 of this report.
The house to be demolished is unique with many architectural features inside and outside.	Addressed in Section 8.12 of this report. The existing building is no statutorily or locally listed and is not located within a Conservation Area.
<i>Impact on amenities of neighbouring properties and future residents</i>	
Loss of light to neighbouring properties	Addressed in Sections 8.38 – 8.55 of this report.
Overlooking and loss of privacy for neighbours	Addressed in Sections 8.38 – 8.55 of this report.
Disrupt quiet residential gardens	Addressed in Section 8.46 of this report. This is a residential development in a residential area and there is no reason to suggest that the proposal would result in noise that is not associated with a residential area.
Extra air pollution and noise disturbance for extra traffic.	This is a residential development and there is no evidence or reason to suggest that the proposal would result in extra pollution or noise that is not associated with a residential area. The additional impact on the highway network is considered to be negligible. The Councils Environmental Health Team have no objection in this regard.

<i>Transport and parking</i>	
Inadequate parking provision will exacerbate existing parking problems	Addressed in Sections 8.62 – 8.65 of this report.
Parking stress survey takes no consideration of church services on Sunday when people cannot park.	The parking stress survey has been undertaken to standard Lambeth Methodology which is considered appropriate in a residential area for this quantum of development.
Construction traffic and disruption	A condition will be imposed requiring a Construction Logistics Plan to ensure construction activities do not cause undue disturbance to the highway network
Increased traffic/exacerbate traffic problems. Moreton Road is used as a rat run and people do not observe the speed limit and ignore the one-way system. Increased risk of collision.	Addressed in Section 8.58 of this report. This is the existing situation. The planning system cannot police how drivers use the roads or whether they respect highway laws.
Does not take into account the redevelopment at 7 Dornton Road into a care facility in terms of extra cars in the roads.	The recent permission at 7 Dornton Road (19/02280/FUL) granted use of the site for vulnerable adults who are not capable of driving and 2 staff, one of which would park on site. The impact on the highway network from that permission is negligible.
<i>Other matters</i>	
Wildlife corridor will be completely lost	Addressed in Sections 8.27 – 8.29 of this report.
Change in the demographics of the area will increase crime	This is a residential development in a residential area. There is no reason to assume the proposal will cause an increase in crime.
Exacerbate impact on already strained services i.e. doctors, dentists, schools.	The application is CIL liable. Addressed in Section 8.74 of this report.
Inadequate community consultation	Neighbours were notified of the application in accordance with the required national guidelines. The applicant also undertook a public exhibition on site on Saturday 15th June between 10am and 2pm, and on Monday

	17th June between 6.30pm and 8.30pm as outlined in the supported Statement of Community Involvement.
Detrimental impact on house prices	Not a material planning consideration.

6.3 The following Councillors have made representations:

Cllr Maria Gatland (South Croydon Ward Councillor). Referred application to committee:

- This is probably the largest backland development we have seen to date in our ward of South Croydon. Running behind the properties in Moreton Road and onto what appears to be Railway Land it is a gross overdevelopment of this area that damages the amenities of residents in Moreton Road and Muggeridge Close in terms of noise and privacy and overlooking.
- The design is one of the worst I have seen and in no way fits into the character of this area with its size and bulk dominating.
- In this time of concern about climate change and air pollution and this Council's declaration of a Climate Emergency the loss of mature trees and nature habitat is concerning.

6.4 Dornton Road Area Resident's Association have objected as follows:

- Residents within Croham Ward are seeing a rapid escalation in demolition of family homes into multiple flats. This is changing the character and community feel at an unprecedented rate
- The design is not in keeping with the area, nor is it innovative enough to warrant special architectural merit.
- The area is outside locations identified for intensification
- There is no evidence that the many projects underway within only a half mile of Moreton Road will be met with demand from buyers
- Only 16 car parking bays to be provided for all these residents. Extra vehicles will have to park on the street, and it is stated in the Transport Statement that 'parking bays in Moreton Road and Dornton Road are fairly heavily parked, but those in Dornton Road are less so'. This suggests that those not able to park on site or on Moreton Road will park on Dornton Road, taking up the space that is intended for use by Dornton Road residents and their visitors. This is clearly not a parking strategy but a car shifting strategy
- Section 4.10 of the submitted transport statement predicts parking needs on data from the 2011 Census, and the applicant's predictions state that the CPZ permit parking bays would be 89% filled. As car ownership has increased since 2011 the parking bays are likely to exceed 90% filled constituting 'Parking stress'
- The application does not consider the likely redevelopment of 7 Dornton Road into a care facility, which will also use up car parking spaces within the road
- With 31 new apartments there will be a substantial increase in traffic through the one-way system of Dornton Road and Moreton Road merging onto the busy Croham Road.

7.0 RELEVANT PLANNING POLICIES AND GUIDANCE

7.1 In determining any planning application, the Council is required to have regard to the provisions of its Development Plan so far as is material to the application and to any other material considerations and the determination shall be made in accordance with the plan unless material considerations indicate otherwise. The Council's adopted Development Plan consists of the Consolidated London Plan 2015, the Croydon Local Plan 2018 and the South London Waste Plan 2012.

7.2 Government Guidance is contained in the National Planning Policy Framework (NPPF), issued 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:

- Delivering a sufficient supply of homes
- Promoting sustainable transport;
- Achieving well designed places;

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

7.4 Consolidated London Plan 2015

- 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
- 3.11 Affordable housing targets
- 3.12 Negotiating affordable housing on individual private residential and mixed use schemes
- 3.13 Affordable housing thresholds
- 5.1 Climate change mitigation
- 5.2 Minimising carbon dioxide emissions
- 5.3 Sustainable design and construction
- 5.12 Flood risk management
- 5.13 Sustainable drainage
- 5.16 Waste net self sufficiency
- 6.3 Assessing effects of development on transport capacity
- 6.9 Cycling
- 6.13 Parking
- 7.2 An inclusive environment
- 7.3 Designing out crime
- 7.4 Local character
- 7.6 Architecture
- 7.14 Improving air quality
- 7.19 Biodiversity and access to nature
- 7.21 Woodlands and trees

7.5 Croydon Local Plan 2018

- SP2 Homes
- SP6.3 Sustainable Design and Construction
- DM1 Housing choice for sustainable communities
- SP4 Urban Design and Local Character
- DM10 Design and character
- DM13 Refuse and recycling
- DM16 Promoting healthy communities
- SP6 Environment and Climate Change
- DM23 Development and construction
- 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

7.6 There is relevant Supplementary Planning Guidance as follows:

- London Housing SPG March 2016
- Croydon Suburban Design Guide Supplementary Planning Document April 2019

8.0 MATERIAL PLANNING CONSIDERATIONS

8.1 The main planning issues raised by the application that the Planning Committee are required are as follows:

1. Principle of development
2. Affordable housing and housing mix
3. Townscape and visual impact
4. Trees, landscaping and biodiversity
5. Housing quality for future occupiers
6. Residential amenity of neighbours
7. Parking and highway safety
8. Flood risk
9. Sustainability
10. Other planning matters

Principle of Development

8.2 This application must be considered against a backdrop of significant housing need, not only across Croydon, but also across London and the south-east. All London Boroughs are required by the London Plan to deliver a number of residential units within a specified plan period. In the case of the London Borough of Croydon, there is a requirement to deliver a minimum of 32,890 new homes between 2016 and 2036 (Croydon's actual need identified by the Croydon Strategic Housing Market Assessment would be an additional 44,149 new homes by 2036, but as there is limited developable land available for residential development in the built up area, it is only possible to plan for 32,890 homes). This requirement is set out in policy SP2.2 of the Croydon Local Plan (CLP) (2018), which separates this target into three relatively

equal sub targets with 10,760 new homes to be delivered within the Croydon Opportunity Area, 6,970 new homes as identified by specific site allocations for areas located beyond the Croydon Opportunity Area boundary and 10,060 homes delivered across the Borough on windfall sites. The draft London Plan, which is moving towards adoption (although in the process of being amended) proposes significantly increased targets which need to be planned for across the Borough. In order to provide a choice of housing for people in socially-balanced and inclusive communities in Croydon, the Council will apply a presumption in favour of sustainable development of new homes.

- 8.3 This presumption includes South Croydon, which is identified in the “Places of Croydon” section of the CLP (2018) as being an area for sustainable growth of the suburbs in the Brighton Road area with a mix of windfall and infill development that respects the existing residential character and local distinctiveness. The Croydon Suburban Design Guide (2019) has recently been adopted, which sets out how suburban intensification can achieve high quality outcomes and thinking creatively about how housing can be provided on windfall sites. As is demonstrated above, the challenging targets will not be met without important windfall sites coming forward, in addition to the large developments within Central Croydon and on allocated sites.
- 8.4 The application is for a flatted development providing additional homes within the borough, which the Council is seeking to promote. The site is located within an existing residential area which is well connected by public transport links and as such providing that the proposal accords with all other relevant material planning considerations, the principle of development is supported.

Affordable Housing and Housing Mix

- 8.5 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.
- 8.6 The proposal is for 31 flats split across three blocks. Blocks A and B are located to the rear and Block C to the frontage. Block B would provide the affordable housing (16 out of the 17 units) at a mix of 1x1 bedroom, 3 x 2 bedroom 3 person and 12 x 2 bedroom 4 person. The development achieves the minimum of 50% affordable units.
- 8.7 The proposed tenure of all of the affordable units is London affordable rent (LAR), which falls within the “affordable rent homes” tenure and is a significantly discounted housing product. This is not the 60:40 split required by policy however the provision of LAR is considered to be more beneficial as it will help to meet the Council's pressing need for low cost homes for rent. The applicant has partnered with Moat Homes Limited, a Registered Provider of affordable housing who have confirmed that the absence of three bedroom affordable flats reflects the demand for two bedroom rented units in this location. They have also commented that rents associated with three bedroom units would preclude their provision viably at LAR levels, and have confirmed that the tenure of the accommodation meets their needs.
- 8.8 Given the high quantum of affordable housing proposed and the applicant's partnership with a Registered Provider, officers are entirely satisfied with the mix and tenure of the proposed affordable units and this is a significant positive element of this scheme.

- 8.9 CLP Policy DM1.2 seeks to prevent the net loss of 3-bedroom homes (as originally built) and homes less than 130m². The existing dwelling on site comprises a 3 bedroom house with a floor area of over 130sqm (138sqm excluding garage and stores). All of the proposed units have floor spaces of less than 130sqm and 5 of the new units would comprise three bedrooms. There would therefore be no net loss of homes under 130sqm or three-bedroom homes as required by Policy DM1.2.
- 8.10 Policy SP2.7 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 requires a minimum provision of homes designed with 3 or more bedrooms on sites of 10 or more dwellings. In urban settings with PTALs of 3/4, the requirement is 40-60% 3+ bedroom units. The policy goes on to say that an exception to this may be where there is an agreement with an associated affordable housing provider that three bedroom dwellings are neither viable or needed as part of the affordable housing element or 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.
- 8.11 19 of the units (5x3bedroom, 14 x 2bedroom, 4-person) would constitute family homes meaning the scheme would provide 61% family sized units (exceeding the target for family units). The proposal provides a net gain in family accommodation, in accordance with/exceeding the policy requirements outlined above.

Townscape and Visual Impact

- 8.12 The existing property is not statutorily listed or locally listed and does not fall within a Conservation Area. Whilst the building contains some attractive qualities, the building is of no particular architectural merit nor does it contribute significantly to the character of the area. It is somewhat of an anomaly in the street scene differing in era and appearance from the more traditional properties either side. As such, there is no objection to its demolition.



Figure 3. Front elevation of 30 Moreton Road

- 8.13 The properties situated in the surrounding area comprise varied architectural forms in terms of their era, scale and appearance. Predominantly Moreton Road and the roads surrounding contain two and a half storey buildings from the Victorian/Edwardian era, detached and semi-detached. Some remain single dwellinghouses whilst others have been converted to flats. More modern interventions can also be found such as the application property itself, and also the blocks to the north at No.16 (as can be seen in Figure 2 above) which were permitted in 2005 and comprise four storeys with a modern roof form. To the south east of the site fronting Doveton Road is a three storey purpose-built block of flats and to the north is the three/four storey block accessed from cul-de-sac Mugeridge Close.
- 8.14 CLP Policy DM10.1 states that proposals should achieve a minimum height of 3 storeys whilst respecting a) the development pattern, layout and siting; b) The scale, height, massing and density; c) The appearance, existing materials and built and natural features of the surrounding area.
- 8.15 Section 2.10 of the Suburban Design Guide SPD (2019) suggests appropriate ways of accommodating additional accommodation on sites based on the site's context. The local context does not fit perfectly into any of the scenarios outlined. Most comparable would be that where the surrounding buildings are predominantly detached dwellings of two or more storeys, new developments may be three storeys with an additional floor contained within the roof space or set back from the building envelope below. Section 2.13 refers to developments on backland sites and recognises that such sites tend to be of a size to accommodate developments of a larger scale and in such scenarios height should generally be no greater than the predominant surrounding buildings.
- 8.16 The proposed building fronting Moreton Road would comprise three full storeys and its height would be stepped to respect the ridge height of the buildings on either side. The

proposed building has a flat roof, which whilst being a contemporary intervention within the street scene, utilises the building height and features to the front elevation to ensure that development is entirely in keeping with the street scene. The front elevation has been designed with two projecting bays and window sizes which are representative of the proportions of the gable features on the adjacent buildings.



Figure 4. Proposed building fronting Moreton Road

8.17 The building would be finished with light coloured brickwork to reflect the colouring of the buildings to either side. The massing would be broken down with stone banding which also takes cues from traditional buildings in the area. Overall, the building sits well within the street scene, not appearing overly prominent or incongruous.



Figure 5. Proposed visual of building fronting Moreton Road

8.18 The proposed building to the rear would have an 'L' shaped form. It would be three storey at its southern end rising to five storeys to the north. Given the location of the building to the rear of the existing buildings on Moreton Road, the proposal would not be overly visible within the public realm, the three storey element would be no greater in height than the existing properties. The taller element would be over 40m from the Moreton Road frontage and therefore the mass would not be a prominent feature within the street scene.

8.19 Whilst it has its own vehicular road, the block of flats on Muggeridge Close has a similar relationship with the buildings on Moreton Road as the current proposal, sitting behind the rear gardens. That building comprises four storeys and has a pitched roof above and therefore the overall height of the current proposal would be similar to the development at Muggeridge Close. Given the height of this adjacent development, it is considered that the scale of the proposed block is entirely in keeping with the area.

8.20 This block is proposed to be constructed from three types of brick to break up the overall massing, separated by vertical recesses. Panels of vertical stack-bonded brickwork have been included to provide additional visual interest to the facades, adjacent to the main entrances, along with areas of brick detailing. The entrances to each apartment block have been extruded from the facade to provide a sense of arrival and enclosure, and to visually differentiate from the rest of the block. The recesses will accommodate the rainwater hoppers and downpipes, where required, avoiding visual clutter on the facades. Balconies are primarily located on the west elevation to prevent any overlooking issues to neighbouring gardens and have been recessed to give additional privacy from passing trains and to allow more light into lower units.



Figure 5. Proposed visual of building fronting Moreton Road

8.21 In accordance with Table 3.2 of the London Plan, this site is classed as having an 'urban' setting (predominant dense development, terraced or mansion blocks, mix of uses, 2-4 storeys, 800m walking distance of a district centre). The London Plan suggests that appropriate densities for sites with a PTAL of 3 is 200-450HR/Ha and PTAL 4 200-700HR/ha. The proposal has a density of 340hr/ha which sits comfortably within the density range outlined above.

8.22 The proposals have been designed to enable future development on the land to the north. This area is currently under multiple ownership, comprising an area of Network Rail land, a narrow strip of land owned by the applicant and a car park used by the residents of Muggeridge Close. Drawings have been submitted to show how a future

development could be accommodated on this land in future, with the relevant consents. The north elevation of the rear block has been designed without windows in order to enable such potential development in the future.

- 8.23 Having considered all of the above, against the backdrop of housing need, officers are of the opinion that the proposed development would comply with the objectives of the above policies in terms of respecting local character.

Trees, landscaping and ecology

- 8.24 The land to the rear of the dwellings on Moreton Road is heavily vegetated. It is currently overgrown with dense ground vegetation, predominantly bramble and either self-seeded saplings or trees which have re-grown from previously cut stumps. There are no mature trees present on the site of good quality.
- 8.25 No significant tree losses are required to facilitate the proposed development. 12 low quality Category C trees and an area of saplings/scrub is to be removed. One moderate quality Category B street tree and two low quality Category C off-site trees are to be retained. It is proposed to re-plant 17 x replacement specimen trees in order to enhance the site and mitigate the loss of trees. These trees are proposed to be of a heavy stock size (12-14cm stem circumference). CHECK – retention of cat B tree in communal space?
- 8.26 The Council's Tree Officer has assessed the Arboricultural Assessment and planting schemes and raises no objection to the scheme. The trees marked for removal offer limited visual amenity value. The proposed landscaping and planting schedule would suitably mitigate the impact of tree loss. The proposed Tree Protection Measures and landscaping details shown on the planting plan can be secured by condition.
- 8.27 Ecology – A Preliminary Ecological Appraisal, Preliminary Roost Assessment & Phase 2 Bat and Reptile Survey Report and Mitigation Plan was originally submitted. The Council's ecological consultant initially express concern to the level of information provided and outlined a number of issues that needed to be overcome. The applicant subsequently submitted an amended assessment with additional information.
- 8.28 The submitted information found that, whilst two species of bats were recorded at the site, no bat roosts were found on site. Activity level of bats was found to be low, the majority of activity being through the local area with very little foraging activity. It is noted that a small area of habitat corridor will be lost by the proposed development, however a new linear connecting green corridor will be created by the planting of new trees along the site boundary. Mitigation measures are proposed to ensure that bats will not be harmed during construction works and it is recommended that bat friendly lighting is required by condition. Measures to enhance bat activity on the site are also recommended, such as bat boxes and features within the new buildings. Therefore potential impact on bats have been minimised. The submitted surveys also confirm that reptiles use the site and therefore protection measures are recommended during construction (such as reptile fencing) as well as long term mitigation and enhancement measures within the development such as habitat piles and rough grassland/wildflower meadow. This would all be secured by condition.

8.29 The Council's ecological consultant has now removed their objection subject to securing the biodiversity mitigation and enhancement measures by a number of conditions.

Housing Quality for Future Occupiers

8.30 All of the proposed new units would comply with or exceed the internal dimensions required by the Nationally Described Space Standards (NDSS).

8.31 23 of the 31 units would be dual aspect (75%). 8 units would be single aspect, all of these facing westwards. There are no single aspect north facing units. As such, the development overall is considered to provide adequate levels of daylight/sunlight for future occupiers. The Daylight/Sunlight Assessment finds that the rear private garden of the ground floor unit in the frontage block would not receive adequate direct sunlight to accord with BRE guidance. This unit however has its main reception room to the front which has access to a further private terrace and front garden and therefore this unit is considered to have private amenity of adequate quality. All other amenity areas would be fully compliant with BRE guideline criteria.

8.32 Given the location of the site adjacent to the railway line, an Environmental Noise and Vibration Assessment accompanies the planning application to assess the living conditions of future occupiers. The report concludes that the ground vibration level is well below the threshold so that the future occupiers will not be affected in this regard. The report also states that recommended internal noise levels can easily be achieved if the recommended construction to the rear facade is undertaken (glazing and insulation). The Council's Environmental Health advisors have confirmed that the Noise Assessment is satisfactory. The applicant should observe the recommendations as submitted in relation to noise and vibration mitigation measures which can be secured by condition.

8.33 A Contaminated Land Assessment has also been undertaken. The Council's Environmental Health advisors consider the report to be satisfactory relating to reports on historical uses of the site, however recommend that the standard contaminated land condition is attached to any planning permission granted requiring further works to be undertaken. As highlighted by the Phase 1 desk study report, there is potential soil contamination based on previous site use and evidence from site walkover. Therefore an intrusive ground investigation needs to be carried out to determine if contamination is present.

8.34 The building is divided into three blocks each with their own access and staircore. All ground floor units will have step free pedestrian access. In terms of accessibility, the London Plan sets requirements for 10% of homes to be designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users. Block B (the only block over three storeys) has a lift and three units within Block B (Units 13, 17 & 21) have been designed to the standards set out under Building Regulations M4(3) and would therefore be in compliance with London Plan policy. The ground floor units and other units in Block B have been designed to the standards set out under Building Regulations M4(2) for accessible and adaptable dwellings.

8.35 With regard to external amenity space, the London Housing SPG states that a minimum of 5 sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1 sqm for each additional unit. Private amenity space has been

provided for all units in the form of private gardens for the ground floor units and balconies for the upper floor units, all of which accord with the minimum standards. The linear nature of the site has resulted in restricted garden spaces to the rear of Block A, better suited to non-family units. Unit 7 (located at the southern end of the block) has the opportunity for a larger, south facing garden, which has resulted in a family unit being located here to take advantage of this extra space. Block B also has some larger private garden spaces, which have been allocated to the 2b/4p family units as required by the registered provider. The provision of private amenity space is acceptable.

8.36 Communal amenity space is provided at the southern end of the site with an area of some 270sqm. This includes an area of naturalistic door-stop playspace as required by Policy DM10.4 of the CLP. Areas within the space have also been identified for biodiversity interventions such as insect hotels and log piles.

8.37 The development is considered to result in a high-quality development including a significant proportion of family units all with adequate amenities and overall provides a good standard of accommodation for future occupiers.

Residential Amenity for Neighbours

8.38 Policy DM10.6 states that the Council will not support development proposals which would have adverse effects on the amenities of adjoining or nearby properties or have an unacceptable impact on the surrounding area. This can include a loss of privacy, daylight, sunlight, outlook or an increased sense of enclosure. The main properties that would be affected by the proposed development are the adjacent dwellings on Moreton Road and Muggeridge Close.



Figure 8: Site plan highlighting the relationship with the adjoining occupiers.

28 Moreton Road

- 8.39 No.28 is located to the north side of No.30. No.28 is divided into two flats (one on each storey), the ground floor flat having a conservatory which runs along the shared boundary of the site.
- 8.40 The upper storeys of the frontage building do not encroach over a 45 degree angle from the rear windows of No.28. The ground floor element is deeper however not as deep as the building at No.28. Given the proposed layout, the development would not be unduly overbearing upon or cause any loss of outlook to No.28. There are no windows proposed that would cause any loss of privacy to No.28, the only windows in the northern elevation serve a stairwell and are shown to be obscurely glazed.
- 8.41 A Daylight, Sunlight and Overshadowing Report has been submitted to assess the impact of the development on the surrounding properties. In terms of impact on daylight and sunlight, the side windows of the ground floor conservatory would receive a loss of light, however this room is served by other sources of day and sunlight via a rear window and large rooflight that would still achieve acceptable levels in accordance with BRE guidelines. A first floor bedroom would also experience a minor alteration (29% transgression) in daylight in comparison to the existing condition. This reduction is not excessive and as it relates to a bedroom (where the primary function of the room is to sleep) is considered to be acceptable. The proposal would therefore only have a minor adverse impact in terms of daylight/sunlight to No.28. In terms of overshadowing of the rear garden of No.28, the proposal would have no adverse impact.
- 8.42 The proposed rear block would be set well away from the rear boundary of No.28. at its closest point the proposed buildings would be over 22m away from the rear elevation of No.28. By reason of this separation and layout, the proposed development at the rear would cause no loss of light, outlook or privacy to No.28.

34 Moreton Road

- 8.43 No.34 is located directly to the south of the application site. It has been converted into 3 flats.
- 8.44 The proposed frontage development does not encroach over a 45 degree angle from the rear windows of No.34 and given the proposed layout, the development would not be unduly overbearing upon or cause any harmful loss of outlook to No.34. There are no windows proposed in the southern elevation that would cause any loss of privacy to No.34. The unit at the second floor of Block A has a roof terrace and this should be adequately screened to the sides to ensure it would not harmfully overlook the gardens of the adjacent dwellings.
- 8.45 The daylight assessment shows that some windows in No.34 will experience some loss of daylight. At ground floor level a bedroom window will experience a very minor transgression of 21% of the existing condition (only 1% over the BRE guidelines permitted reduction). The side facing window would experience a transgression of 35% which can be considered a moderate reduction in daylight, however would be fully compliant with the second daylight test (the no-skyline assessment). The applicant states that this window serves a kitchen however the planning history shows this to be a secondary bedroom window. At first floor level two side facing windows also fail to

meet the BRE guidelines in terms of daylight. From looking at the planning history of the site (87/03816/P) it appears that the windows affected serve a hallway (non-habitable space). Paragraph 2.9 of the Suburban Design Guidance (SDG) states that daylight/sunlight assessments will not normally be required where a neighbour's window directly faces onto or over an application site in a manner that is considered to be un-neighbourly. These un-neighbourly windows place undue restraints on the development, and as such the light and outlook they receive will not receive significant protection. Given the location of the windows directly facing onto the application site and the use of the rooms that the windows serve, overall it is concluded that the proposal would have only a minor adverse impact on daylight to No.34. Given the orientation of the buildings, a sunlight assessment is not required in terms of the impact on No.34. In terms of overshadowing of the rear garden of No.34, the proposal would have no adverse impact.

- 8.46 The proposed access road to the rear development would align the side boundary with No.34. It is acknowledged that there will be some impact on the amenities of the rear garden to this neighbouring property in terms of noise disturbance from vehicles, however the level of activity in the car park will be relatively modest. It is proposed to erect a 2m high close-boarded fencing to the boundaries of the site and some new planting beyond the rear of No.34 which should help to mitigate any adverse impacts.
- 8.47 The proposed rear block would be located approximately 20m from the rear elevation of No.34 and approximately 10m from the rear boundary. By reason of this separation, the proposed development at the rear would cause no loss of light, outlook or privacy to No.34.

Other Properties on Moreton Road

- 8.48 The development would sit to the rear of No's. 24 to 40 Moreton Road. The properties in Moreton Road at the southern end of the application site have shorter rear gardens than the properties to the north.
- 8.49 The rear elevations of No's. 24/26 are over 20m away from the proposed development at the rear and as such the proposal would not be unduly overbearing of cause any loss of privacy. The daylight/sunlight assessment demonstrates that the proposals would have no adverse impact on light to these dwellings.
- 8.50 No's.36/38/40 have shorter rear gardens, No.40 being the shortest. The proposed development would be located approximately 14m from the rear elevation of No.40. Whilst this gap is sufficient to ensure the proposal will not be unduly overbearing, the eastern elevation of Block A has been designed to ensure that the development would not directly overlook the rear of these properties in any case. The units at this end of the building have been internally arranged so that there are no upper level main habitable rooms facing eastwards. All of the first and second storey windows would be obscurely glazed and this would be secured by condition. The daylight/sunlight assessment demonstrates that the proposals would have no adverse impact on light to these dwellings.
- 8.51 19 Moreton Road is situated on the opposite side of Moreton Road, approximately 23m from the front elevation of the proposed frontage block, retaining a similar relationship as with the existing dwelling at No.30. Given the gap between the properties the

proposal would cause no loss of privacy or outlook. The daylight/sunlight assessment demonstrates that the proposals would have no adverse impact on light to this dwelling.

8.52 Overall, the impact on the amenities of the properties on Moreton Road would be acceptable.

Muggeridge Close

8.53 The flatted residential block on Muggeridge Close has a large surface car park to its rear (between the flats and the development site). The proposed building would be located over 50m from the adjacent block. Given this considerable gap, the proposal would not be overbearing or cause any loss of outlook, light or privacy to the units in Muggeridge Close.

Dwellings on the opposite side of the Railway Line (St Peters Street)

8.54 The rear boundaries of these dwellings are located over 40m from the application site. Given this considerable gap and separation by the railway line, the proposal would not be overbearing or cause any loss of outlook, light or privacy to these properties.

8.55 Given the location of the site, no other residential properties would be significantly affected by the proposal – in terms of direct effects on residential amenities.

Highway Safety, Access and Parking

8.56 Moreton Road together with the adjoining Doveton Road and Dornton Road form a local, predominantly residential access road system running south from Croham Road. A clockwise one way traffic system operates in Dornton Road, Doveton Road and Moreton Road (north from Doveton Road).

8.57 The site has a PTAL of 3-4 indicating moderate to good access to public transport. It is located 500m from a Local Centre/Primary Shopping Area, 500m (5 minute walk) from South Croydon railway station and within 500m of 4 different bus routes (160m Birdhurst (64, 433), 360m Sussex Road (403), 500m Croham Road (403, 142)). Moreton Road and surrounding streets are situated within a Controlled Parking Zone whereby parking is restricted to permit holders only or pay at machine (Monday - Saturday 9am to 5pm).

8.58 The number of trips expected to be generated by the proposed scheme is considered to be immaterial when considered against the existing background traffic flows in the area.

8.59 The existing house has an in-out access arrangement with two vehicular crossovers. It is proposed to remove the northernmost access and create a single vehicular access at the southern end of the frontage, by enlarging the existing crossover. The required pedestrian visibility splays and vehicular visibility splays are achieved at the access.

8.60 The access roadway is 4.2 metres wide which is adequate for two vehicles to pass each other. The undercroft access has a clearance height of 4.5m which is adequate to enable emergency and refuse vehicles to access the entire site. The access roadway has a footway along its northern side and beyond that, the parking access and manoeuvring area will operate as shared vehicle/ pedestrian surface which is considered appropriate given the clear visibility within that area.

- 8.61 The parking forecourt provides sufficient manoeuvring space for vehicles to access and egress the site in a forward gear. Swept paths drawings have been submitted for the individual parking bays as well as demonstrating that a fire tender and refuse vehicle could manoeuvre within the site and would not have to either reverse back into the site or out onto the public highway.
- 8.62 The London Plan sets out maximum car parking standards for residential developments based on public transport accessibility levels and local character. 1-2 bedroom units should provide less than 1 space per unit, 3 bedroom units up to 1.5 spaces per unit and 4 bedroom units up to 2 spaces per unit. For the proposed scheme, the London Plan maximum requirement is 33.5 spaces.
- 8.63 On-site parking provision is provided at a rate of 16 spaces including 3 spaces for disabled bays. Analysis of Census Ward data for South Croydon suggests that a development of this size and mix could potentially generate parking demand from occupants of up to 28 vehicles. This means that as a worst-case scenario there could be potential overspill of 12 vehicles onto the surrounding road network.
- 8.64 A parking stress survey has been carried out which has recorded maximum overnight parking stress to be 74% in CPZ permit bays (59 of 80 spaces occupied) and 49% at all kerbside available overnight (CPZ bays and single yellow line spaces subject to Monday to Friday daylight restrictions) (64 spaces of 130 available) within 200m of the application site. In the daytime the parking stress is much lower. In the worse-case scenario as a result of the development, parking pressure in all unobstructed kerbside spaces lawfully available at night would be 58% (76 spaces of 130). Whilst this represents a snapshot in time, it demonstrates that there is capacity on the surrounding highway to accommodate any potential overspill vehicles from the development.
- 8.65 As the level of car parking provided on-site is not expected to accommodate all parking demand from occupants, the applicant has agreed that future occupier's access to resident parking permits for this area would be removed by S106. The applicant has also agreed to provide funding for the implementation of a public car club bay. Car clubs are an effective tool to limit the demand for private car ownership and mitigate against potential overspill parking onto surrounding streets. It is proposed that this car club parking space would be provided in front of the north end of the site's Moreton Road frontage, where the existing domestic crossover would be stopped up. This would mean that no existing street parking bays are lost as a result of the car club bay. The applicant has agreed to fund the implementation of the car club bay and the running costs for a period of 3 years.
- 8.66 Local Plan Policy DM30 states that 20% of parking bays should have EVCP with future provision available for the other bays. 3 of the car parking spaces will be equipped with EVCP the rest should have passive provision for future demand. Full details and provision of the EVCP will be secured by conditioned.
- 8.67 Three of the parking bays (10%) are Blue Badge bays all with step free access from the rear building.
- 8.68 The development generates a need for 56 cycle storage spaces to accord with London Plan requirements. A total of 62 spaces are shown to be provided for future occupiers

as well as 4 spaces for visitors. A purpose built store would be located within the rear block and individual storage provided for the 4 units at the front of the site.

- 8.69 To further promote sustainable means of travel a Residential Green Travel Plan has been submitted. In line with the detail above, the scheme is accompanied by a good level of cycle parking and some electrical vehicle charging points plus a proposed on-street car club bay. The targets for reducing car use and increasing cycling (at 3% respectively within 12 months of opening) are very good. The plan proposes surveying of future residents, held after 3 months of occupation then at 3, 5 and 7 years. The cycle parking and on-street car club bay and membership package should help establish good travel habits. Details contained with the Travel Plan can be secured by condition.
- 8.70 As outlined above, refuse vehicles would be able to access the site. Refuse storage is shown in two locations. The stores can accommodate the required number of bins. A bulky waste store is also proposed of the required size (10sqm).
- 8.71 In order to ensure that the proposed development would not have any adverse impact on the highway network or on the surrounding residents, a Construction Logistics Plan (CLP) will be required by pre-commencement condition. As well as this Environmental Health colleagues have requested a Delivery and Servicing Management Plan be submitted.

Flood Risk

- 8.72 The site is located within an area with potential for ground water flooding to occur at the surface. Policy DM25 requires all development to incorporate sustainable drainage measures (SuDS). A Flood Risk Assessment (FRA) and Drainage Strategy have been submitted as part of the application. It is proposed that surface water will be disposed of by utilising permeable paving and soakaways. The LLFA have reviewed the submitted information. Their initial concerns have been addressed and overcome and they have no objection to the application subject to the imposition of a condition. In terms of groundwater flooding, resilient and resistance mitigation measures are recommended (such as use of appropriate materials and construction of the ground floor units, positioning of electrical appliances) which would also be secured by condition.

Sustainability

- 8.73 Policy seeks high standards of design and construction in terms of sustainability and sets out Local and National CO2 reduction targets. An Energy Statement has been provided which shows that the minimum 35% on-site CO2 reductions beyond Part L of 2013 Building Regulations can be achieved (meeting local policy requirements) through on-site energy efficiency measures and renewable technologies (PV panels) (amounting to a 41% CO2 reduction). Zero carbon cannot be achieved on site and therefore the remaining shortfall will be offset through a cash-in-lieu contribution, secured through the Section 106 Agreement.

Other Matters

- 8.74 The development will be liable for a charge under the Community Infrastructure Levy (CIL). This payment will contribute to delivering infrastructure to support the development of the area, such as local schools.

8.75 An employment and training strategy and contribution would be secured through a legal agreement to ensure the employment of local residents during construction.

Conclusions

8.76 Given the significant need for housing within the Borough, the principle of residential development is considered acceptable in this area. The proposal provides a policy compliant affordable housing offer and agreement has been reached with a Registered Provider to deliver the affordable units on site. The proposed design would respect the character and appearance of the area and would represent a sensitive and sustainable intensification of the site. The proposal would have no significantly harmful impact on the amenities of the adjacent properties or on the highway network. Officers are wholly satisfied that the scheme is worthy of a planning permission.

8.77 All other relevant policies and considerations, including equalities, have been taken into account.