

1.0 APPLICATION DETAILS

Ref: 20/01303/FUL
 Location: 19 Downsview Road, Upper Norwood, London, SE19 3XD
 Ward: Crystal Palace and Upper Norwood.
 Description: Demolition of existing dwelling and garage, erection of two storey building (with lower ground and roofspace accommodation) comprising 9 flats with associated parking, amenity space and waste and cycle stores.
 Drawing Nos: 19127E (Received 17/03/2020), 2047G (Received 17/03/2020), D162.001 (Received 17/03/2020), LUM 001 PL1 (Received 23/04/2020), LUM 001 PL2 (Received 23/04/2020), LUM 001 PL2 (Received 23/04/2020), LUM 001 PL3 A (Received 23/04/2020), LUM 001 PL4 B (Received 23/04/2020), LUM 001 PL5 C (Received 23/04/2020), 001 A (Received 23/04/2020), LUM 001 PL7 A (Received 23/04/2020), LUM 001 PL8 B (Received 23/04/2020), LUM 001 PL9 B (Received 23/04/2020), LUM 001 PL10 A (Received 23/04/2020), LUM 001 PL11 (Received 23/04/2020), LUM 001 PL12 A (Received 23/04/2020), LUM 001 PL13 (Received 23/04/2020), LUM 001 PL14 (Received 23/04/2020)
 Agent: Mr Neal Thompson
 Applicant: Lumiere Property
 Case Officer: Paul Young

| | studio | 1 bed | 2 bed | 3 bed | 4 bed (+) |
|-----------------|---------------|--------------|--------------|--------------|------------------|
| Existing | 0 | 0 | 0 | 1 | 0 |
| Proposed | 0 | 2 | 3 | 4 | 0 |

All units are proposed for private sale

| Number of car parking spaces | Number of cycle parking spaces |
|-------------------------------------|---------------------------------------|
| 6 | 16 |

1.1 This application is being reported to committee owing to the receipt of objection letters in excess of the threshold set out in the Croydon Constitution and owing to a referral from Cllr Mann.

2.0 RECOMMENDATION

- 2.1 That the Planning Committee resolve to GRANT planning permission.
- 2.2 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) Commencement 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) Material specifications/samples of external materials to be submitted
- 4) Compliance with hard and soft landscaping plan including boundary treatments
- 5) No additional windows in any flank elevations above ground floor without consent
- 6) Access Road and car parking/manoeuvring area to be provided as shown
- 7) Visibility splays to be provided/retained
- 8) Compliance with submitted Tree Protection Plan.
- 9) Details of boundary treatments and privacy screens.
- 10) Submission of further details of electric vehicle charging points
- 11) Submission of Construction Logistics Plan
- 12) Requirement for 19% Carbon reduction and 110 litre Water usage
- 13) Details of site specific SUDS to be submitted
- 14) Implementation of waste/recycling areas prior to occupation of units
- 15) Implementation of cycle parking/storage areas prior to occupation of units
- 16) Any other planning condition(s) considered necessary by the Director of Planning and Strategic Transport

INFORMATIVES

- 1) Community Infrastructure Levy
- 2) Highway/Crossover Works
- 3) Compliance with Building/Fire Regulations
- 4) Any other informative(s) considered necessary by the Director of Planning and Strategic Transport

3.0 PROPOSAL AND LOCATION DETAILS

Proposal

3.1 The applicant seeks full planning permission for the following:

- Demolition of the existing single storey dwelling and garage
- Erection of a replacement two storey building with roofspace and lower ground/basement accommodation to provide 9 flats (4 x 3 beds, 3 x 2 beds and 2 x 1 beds) complete with balcony/terraced areas and/or private gardens and communal amenity space.
- Excavation of part of the rear of the site to provide for lower ground accommodation and private gardens/terraces to units 1, 2 and 4.
- Excavation of part of the front of the site and creation of new vehicular crossover and forecourt providing 6 vehicular parking spaces for the development
- Provision of new boundary treatments, privacy screens, pathways and other hard and soft landscaping.

Site and Surroundings

- 3.2 This application concerns an area of land (approximately 0.1066 ha in area) which lies on the eastern side of Downsview Road and currently houses a single storey detached dwelling with front and rear gardens. The immediate area is primarily residential, comprising a mix of single storey and two storey dwellings along Downsview Road and larger 3 storey flatted developments further to the East (along Woodlands Road).
- 3.3 The site slopes fairly steeply upwards to the North/North East. The site has a Public Transport Accessibility Level (PTAL) of 2 (low), and Downsview Road (in front of the site) has a 1 in 30 year (high) risk of surface water flooding.
- 3.4 A current aerial photo of the site is shown below:



Planning History

- 3.5 There is no relevant planning history in relation to the site. There was a recent application next door at number 21 Downsview, the details of which are set out under the headings below:

| Address and Reference | Description | Decision | Date |
|---|---|--------------------------|------|
| 21 Downsview Road 19/06082/FUL | Demolition of the existing dwelling and the erection of a two storey replacement building (with lower ground and roofspace accommodation) comprising 8 flats with associated car parking, waste and cycle store, and amenity space. | Application Withdrawn | |

4.0 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The principle of the development is acceptable given the residential character of the surrounding area.
- The design and appearance of the development is of a suitably high quality, and would not harm the character of the surrounding area.
- Subject to conditions, the living conditions of adjoining occupiers would be protected from undue harm.
- The mix of accommodation is acceptable/encouraged and living standards of future occupiers would comply with National, Regional and Local standards.
- Subject to the suggested conditions, the proposed access/layout, level of parking is acceptable and would not unduly harm highway safety
- Subject to compliance with a tree protection plan and a suitable landscaping scheme (secured via conditions), no harm would result to visual amenity or biodiversity.
- Subject to conditions, suitable sustainable energy, water and drainage measures can be secured.

5.0 CONSULTATIONS

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

6.0 LOCAL REPRESENTATION

6.1 Neighbour notification: 11 local addresses have been notified. A site notice was also displayed at the entrance to Woodlands Road (from Beulah Hill). Written objections have been received from 49 separate addresses, with 2 supporting written representations on the grounds of provision of additional housing.

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:

| (Planning Related) Objection | Officer comment |
|-------------------------------------|------------------------|
|-------------------------------------|------------------------|

| | |
|---|--|
| <i>Design and appearance</i> | |
| Overdevelopment of the site | Addressed in Paragraphs 8.5-8.13 of this report. |
| Out of character/harmful to the area due to it bulk/siting and design | Addressed in Paragraphs 8.5-8.16 of this report. |
| <i>Impact on amenities of neighbouring properties</i> | |
| Loss of light, outlook and privacy to neighbouring properties | Addressed in Paragraphs 8.25-8.32 of this report |
| Extra pollution and noise | 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. |
| <i>Landscape/Trees</i> | |
| Loss/Harm of trees, vegetation and natural habitat | Addressed in paragraph 8.43 of this report. |
| <i>Transport and parking</i> | |
| Insufficient parking provision | Addressed in paragraphs 8.33-8.39 of this report |
| Adverse impact on highway safety | Addressed in paragraphs 8.33-8.39 of this report. |
| <i>Other matters</i> | |
| Strain on public services/infrastructure | If granted permission and implemented, the development would be liable for CIL payments and the units would generate Council Tax payments which could fund infrastructure/services. |
| Increase in Flood Risk | Addressed in paragraph 8.41-8.42 of this report |
| Disruption during Construction | A Construction management plan will be secured via planning condition |

6.3 Note that a number of non-planning related concerns (eg impact on utilities, setting a precedent, loss of property value, conflict with land covenants etc) have also been raised.

6.4 Norwood Society: Object to the application on the following (summarised) planning related grounds:

- Overdevelopment
- Poor Design/out of character
- Poor quality of accommodation for occupants
- Harm to neighbouring amenity in terms of overlooking, increased noise, loss of outlook and overshadowing.
- Loss of trees/biodiversity

6.5 Councillors Mann has objected to the application and referred this application to committee on the following (summarised) planning related grounds:

- Overdevelopment

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 (CLP) 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.

7.3 The main planning Policies relevant in the assessment of this application are:

Consolidated London Plan 2016 (LP):

- 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
- 3.14 – Existing Housing
- 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
- 5.18 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
- 7.4 Local Character
- 7.6 Architecture
- 8.13 Community Infrastructure Levy

Croydon Local Plan 2018 (CLP):

- 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
- SP6 Environment and Climate Change
- DM23 Development and construction
- DM25 Sustainable drainage systems and reducing floor risk
- DM27 Biodiversity
- DM28 Trees
- SP8 Transport and communications
- DM29 Promoting sustainable travel and reducing congestion
- DM30 Car and cycle parking in new development

Supplementary Planning Documents/Guidance

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

Emerging London Plan

- 7.4 Whilst the emerging New London Plan is a material consideration, the weight afforded is down to the decision maker linked to the stage a plan has reached in its development. The Plan appears to be close to adoption and therefore, the New London Plan's weight has increased following on from the publication of the Panel Report and the London Mayor's publication of the Intend to Publish New London Plan. The Planning Inspectors' Panel Report accepted the need for London to deliver 66,000 new homes per annum (significantly higher than existing adopted targets), but questioned the London Plan's ability to deliver the level of housing predicted on "small sites" with insufficient evidence having been presented to the Examination to give confidence that the targets were

realistic and/or achievable. This conclusion resulted in the Panel Report recommending a reduction in London's and Croydon's "small sites" target.

- 7.5 The Mayor in his Intend to Publish New London Plan has accepted the reduced Croydon's overall 10 year net housing figures from 29,490 to 20,790 homes, with the "small sites" reduced from 15,110 to 6,470 homes. Crucially, the lower windfall housing target for Croydon (641 homes a year) is not dissimilar to but slightly larger the current adopted 2018 Croydon Local Plan target of 592 homes on windfall sites each year.
- 7.6 It is important to note, that whilst the Secretary of State has not supported the Intend to Publish New London Plan, that the overall housing target in the New London Plan would be 2,079 new homes per annum (2019 – 2029) compared with 1,645 in the Croydon Local Plan 2018. Therefore, even with the possible reduction in the overall New London Plan housing targets, assuming it is adopted, Croydon will be required to deliver more new homes than our current Croydon Local Plan 2018 and current London Plan (incorporating alterations 2016) targets.
- 7.7 For clarity, the Croydon Local Plan 2018, current London Plan (incorporating alterations 2016) and South London Waste Plan 2012 remain the primary consideration when determining planning applications.

8.0 MATERIAL PLANNING CONSIDERATIONS

8.1 The main planning issues relevant in the assessment of this application are as follows:

- Principle of development
- Townscape and visual impact
- Mix and quality of proposed accommodation
- Impact on amenities of surrounding residents
- Access, Parking and Highway Safety
- Sustainability and Flood Risk
- Biodiversity, Trees and Ecology
- Waste/Recycling Facilities

Principle of Development

- 8.2 Paragraph 59 of the 2018 National Planning Policy Framework (NPPF) states that *"to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay."*
- 8.3 Similarly, the London Plan and Croydon Local Plan identify appropriate use of land as a material consideration to ensure that opportunities for development

are recognised and housing supply optimised. It is acknowledged that windfall schemes which provide sensitive renewal and intensification of existing residential areas play an important role in meeting overall demand and thus helping to address overcrowding and affordability issues.

- 8.4 Given the site is within an established residential area, the principle of proposing residential development on the site is therefore considered acceptable (and is indeed encouraged) by adopted planning policies and guidance.

Townscape and Visual Impact

- 8.5 The existing building does not hold any special significant architectural merit and is neither locally nor statutorily listed. Therefore there is no 'in principle' objection to its demolition.
- 8.6 Policy SP4.1 of the 2018 Local Plan states that the Council will require development of a high quality, which respects and enhances Croydon's varied local character and contributes positively to public realm, landscape and townscape to create sustainable communities
- 8.7 Similarly, Policy DM10.1 of the 2018 Local Plan states that proposals should be of high quality and, whilst seeking to achieve a minimum height of 3 storeys, should respect:
- 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; the Place of Croydon in which it is located.
- 8.8 In relation to density, Policy 3.4 of the London Plan indicates that in suburban areas with PTALs of 2-3, an appropriate density equates to 150-250 habitable rooms per hectare (hr/ha).
- 8.9 The proposed development would provide 29 habitable rooms, which equates to a density of around 272 hr/ha. This is slightly above this threshold. However, it is noted that in the subtext of Policy 3.4 it states that a rigorous appreciation of housing density is crucial to realising the optimum potential of sites, but it is only the start of planning housing development, not the end. It is not appropriate to apply it (the density matrix) mechanistically.
- 8.10 Indeed, the Council's Supplementary Planning Document titled Suburban Residential Development (2019) sets out more detailed guidance on how to (best) meet the requirements of Policies SP4.1 and DM10.1
- 8.11 In relation to bulk and scale, Policy 2.10 of the SPD sets out that where surrounding buildings are predominantly single storey, new development

should be two stories with a third storey within the roof space as shown in the diagram below:



Figure 2.10d: Where surrounding buildings are predominantly single storey, new development should seek to accommodate a third storey within the roof space.

8.12 The proposed development would largely follow this guidance, although, owing to the slope of the land, would appear somewhat taller from the South given the significant downward slope of the land. Notwithstanding, given the setback from the front (by at least 3.7m) and by the side (by at least 0.7m) boundaries, and the fact that the bulk of development would be set slightly further back into the site (by 5.8-6m) the development would not appear unduly prominent within the streetscene.

8.13 It is also noted that, unlike in figure 2.10, not all the properties in the immediate vicinity are single storey, with its neighbour at number 17 being 1.5 – 1.75 stories, and the properties opposite (number 24, 26, 28, 30, 32 etc) all being two stories in height, as shown in the photo below:



8.14 Concerns have been raised that the lower ground level to the front of the building (clad in stone) actually results in a three storey building, however, this is due to the topography of the land and the steep downward slope to the south. This 'storey' accounts for a very small proportion of the floorplan and simply provides waste and cycle parking facilities, much like the lower level garage present at number 17 next door. Please see photo of number 17 below.



8.15 The design approach taken for the proposed development is considered be of a generally faithful nature with some contemporary elements, combining certain materials and features (such as hipped and dual pitched gable ended tiled roof forms and red stock bricks) with stone cladding, aluminium fenestration and metal railed balustrades/terraces. In general, the proposed design is considered to be of a good quality and in compliance with adopted policies and guidance, although further details on the material specifications will be secured via condition to ensure that they are of a suitably high quality. Proposed elevational plans/perspectives of the proposed development are shown below:



8.16 Given the assessment above, and subject to the attached conditions, the application is not considered to harm the character or appearance of the site or the surrounding area.

Mix and Quality of Accommodation Provided

8.17 Policy DM1.2 seeks to prevent the net loss of small family homes by restricting the loss of three bedroom units and the loss of units that have a floor area of less than 130sqm. The existing unit is a 3 bed and measures approximately 125sqm. However, 4 x 3 bed units are proposed, which would result in a net gain of small family homes, and as such, there is no conflict with Policy DM1.2.

8.18 Policy SP2.7 of the 2018 Local Plan states that the Council will seek to ensure that a choice of homes is available in the borough that will address the borough's need for homes of different sizes. For both market and affordable

housing, the Council strategic target for 30% of all new homes up to 2036 to have three or more bedrooms.

8.19 4 of the 9 units (44%) of the units would be 3 bedroom units which would exceed the 30% target set out in Policy SP2.2. In addition to this, two large 2 bedroom 4 person units are also proposed which could accommodate small families. As such this housing mix would be acceptable, and indeed, this high provision of family units adds additional weight in favour of the proposal.

8.20 In relation to the quality of the accommodation provided, Policy 3.5 of the 2016 London Plan states that housing developments should be of the highest quality, internally, externally and in relation to their context and to the wider environment. It indicates that the design of all new housing should enhance the quality of local places, taking into account physical context and local character. Policy 3.5 sets out minimum GIA standards for new residential developments.

8.21 In addition to the above, Policy DM10.4 of Croydon’s local plan states that all proposals for new residential development will need to provide private amenity space that:

- Is of high quality design, and enhances and respects the local character;
- Provides functional space (the minimum width and depth of balconies should be 1.5m);
- Provides a minimum amount of private amenity space of 5m² per 1-2 person unit and an extra 1m² per extra occupant thereafter;
- All flatted development and developments of 10 or more houses must provide a minimum of 10m² per child of new play space, calculated using the Mayor of London’s population yield calculator and as a set out in Table 6.2 below. The calculation will be based on all the equivalent of all units being for affordable or social rent unless as signed Section 106 Agreement states otherwise, or an agreement in principle has been reached by the point of determination of any planning application on the amount of affordable housing to be provided. When calculating the amount of private and communal open space to be provided, footpaths, driveways, front gardens, vehicle circulation areas, car and cycle parking areas and refuse areas should be excluded.

8.22 These standards are set out within table 6.2 within Policy DM10.4. A breakdown of the development in relation to GIA’s and Amenity space requirements and provisions of the development are set out in the following table:

| Unit No. | Unit Type | GIA | | Private Amenity (PA) | |
|----------|-----------|----------------------------|----------------------------|----------------------------|----------------------------|
| | | Required (m ²) | Provided (m ²) | Required (m ²) | Provided (m ²) |
| 1 | 3b4p | 74 | 82 | 7 | 50 |

| | | | | | |
|---|------|----|----|---|-----|
| 2 | 1b2p | 50 | 50 | 5 | 21 |
| 3 | 2b3p | 61 | 61 | 6 | 6.2 |
| 4 | 1b2p | 50 | 50 | 5 | 21 |
| 5 | 3b4p | 74 | 77 | 7 | 9.6 |
| 6 | 3b4p | 74 | 82 | 7 | 9.7 |
| 7 | 2b4p | 70 | 73 | 7 | 6.2 |
| 8 | 3b4p | 74 | 92 | 7 | 5.1 |
| 9 | 2b4p | 70 | 76 | 7 | 5.1 |

8.23 The proposed development would generally exceed the standards. It is noted that a few of the units (numbers 7,8 and 9) would not quite meet private amenity standards. However, the GIAs of these units all exceed London Plan standards, and the subtext of Policy DM10.4 indicates that where there is a shortfall in Private amenity space provision, this can be compensated for via an enlarged GIA. Additionally, a level communal area around 95m² would also be provided, which could also act as suitable playspace.

8.24 Similarly, the units in the roofspace would have floor to ceiling heights within London Plan standards/tolerances. As such, in general, the proposed accommodation is considered to be of a good standard and no conflicts with adopted policy or guidance are identified.

Impacts on Neighbouring Residential Amenity

8.25 Policy DM10.6 of the Croydon Local Plan states that The Council will support proposals for development that ensure that;

- The amenity of the occupiers of adjoining buildings are protected; and that
- They do not result in direct overlooking at close range or habitable rooms in main rear or private elevations; and that
- They do not result in direct overlooking of private outdoor space (with the exception of communal open space) within 10m perpendicular to the rear elevation of a dwelling; and that
- Provide adequate sunlight and daylight to potential future occupants; and that
- They do not result in significant loss of existing sunlight or daylight levels of adjoining occupiers.

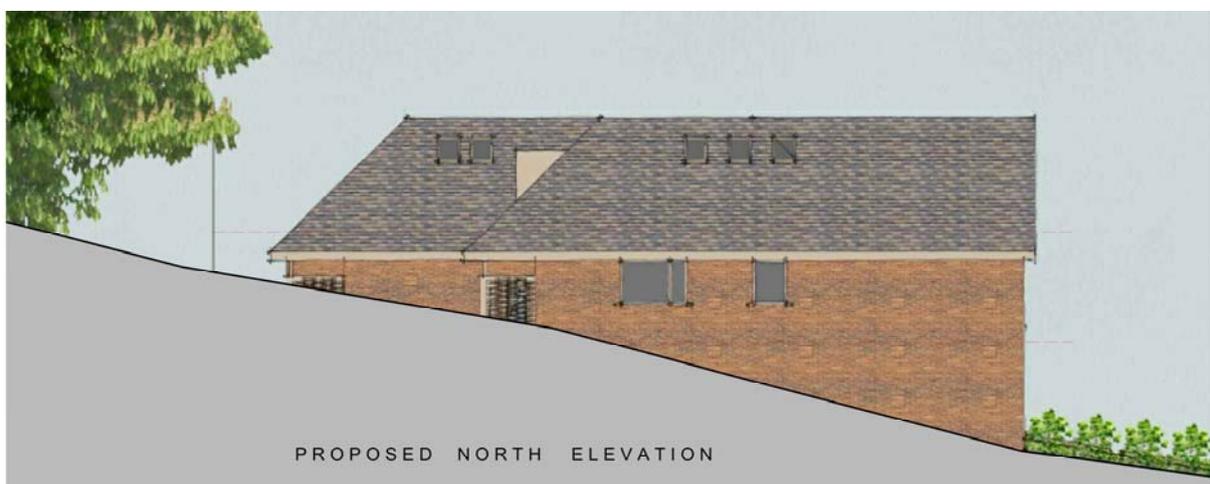
8.26 The nearest residential properties to the development are numbers 17 to the North and number 21 to the South.

8.27 In terms of the rear building line, Suburban Design Guide SPD (2019) states that depth of the projection should be no greater than 45 degrees as measured from the middle window of the closest ground floor habitable room on the rear wall of the main neighbouring property on both side. The relevant extract from the Suburban Design Guide SPD (2019) which demonstrates this is shown below.



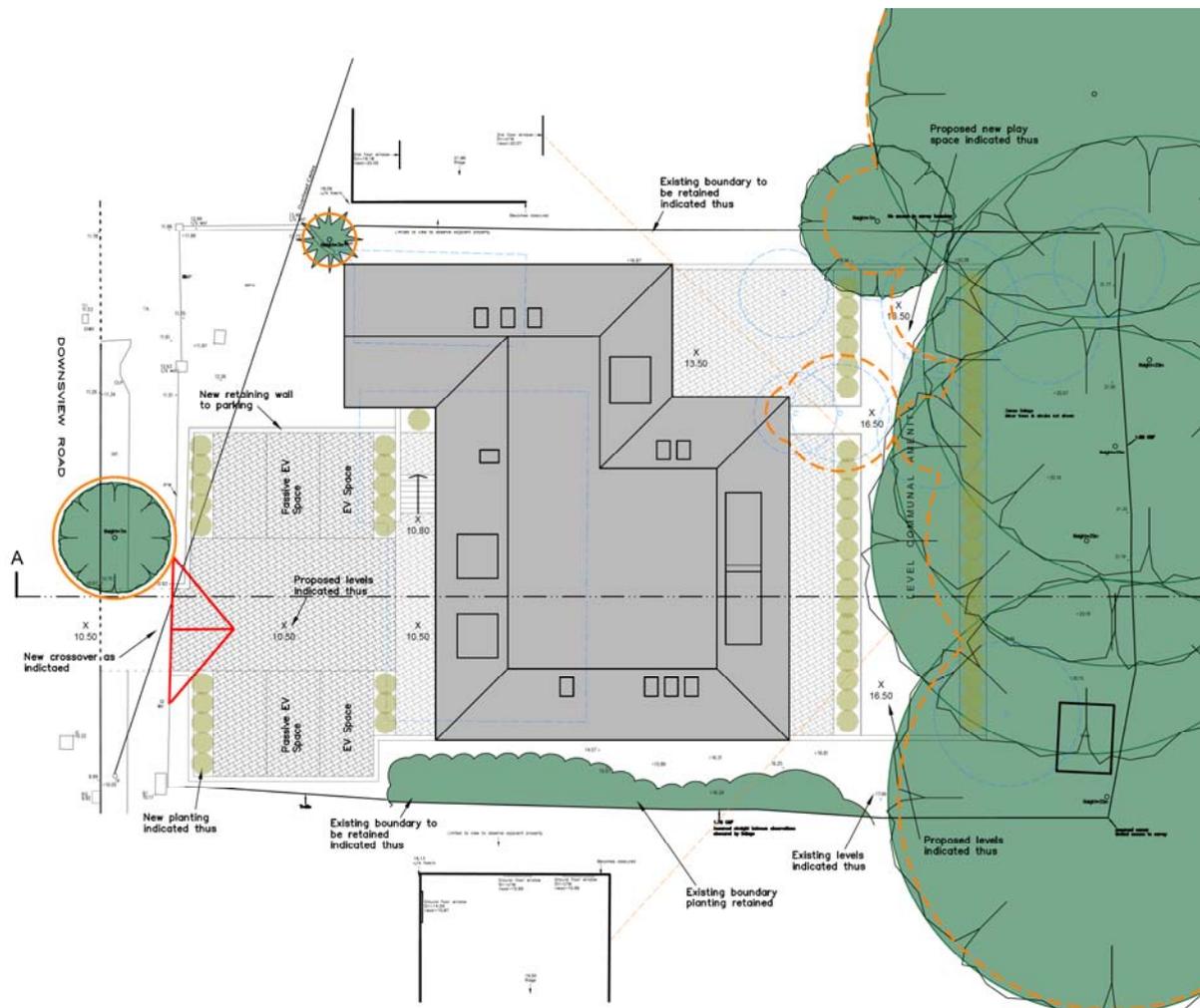
Figure 2.11b: Depth of projection no greater than 45 degrees, as measured from the middle of the window of the closest ground floor habitable room on the rear wall of the main neighbouring property on both sides.

8.28 In relation to the impact on number 17, the proposed development would be staggered to the rear, and as such, would not subtend 45 degree horizontal or vertical lines drawn from the nearest habitable room windows serving this property. As such, there would be no conflict with BRE guidelines (which seek to preserve adequate daylight and sunlight to adjoining properties). Given the proposed excavation to the rear, the amount of 'above ground' visible development would be limited when viewed from the rear of number 17 (it would appear as single storey form with roofspace accommodation). It is also noted that given the steep upward slope, the windows serving number 17 are at a higher level/greater height. As such, there would not be any material harm to the amenities of this occupier in terms of loss of daylight/sunlight or outlook. The relationship is shown in the proposed side elevation (below) and the proposed site plan and rear elevation (later on in this section)



8.29 In relation to the impact on number 21, given the slope of the land, the proposed development would appear slightly more dominant to the rear (1.75 rather than 1.5 stories), but once again, there no conflict with BRE 45 degree guidelines and, given the orientation of the development (due north), there would be no impacts on direct sunlight reaching this property (or its rear garden). It is also noted that the occupiers of this property have written in support of the application.

8.30 The proposed site plans and rear (east) elevation plans further help demonstrate the relationship between the proposed development and its neighbours and are shown below:





8.31 In relation to overlooking, no flank windows are proposed, and privacy screens are proposed on the raised balcony/terrace/roof inset areas to prevent overlooking of both neighbours (17 and 21). Full details of these will be secured via condition. Subject to this, no material harm in terms of overlooking would occur.

8.32 The proposed development would introduce additional activity and lighting in and around the site. However, this activity would be residential in nature, within a residential area, and adopted planning policies and guidance encourage intensification of residential use in principle (subject to a full planning assessment). As such, it is not considered to result in unacceptable harm in this regard.

Access, Parking and Highway Safety

8.33 Policy SP8.15 of the Croydon Local Plan states that the Council will encourage car free development in Centres, where there are high levels of PTAL and when a critical mass of development enables viable alternatives, such as car clubs (while still providing for disabled people). Detailed car parking standards are contained within the Croydon Local Plan's Detailed Policies and Proposals.

8.34 The site has a Public Transport Accessibility Level (PTAL) of 2 (low). The 2016 London Plan requires a maximum of 1.5 spaces for 3 bedroom dwellings, and maximum 1 space for 2 bed dwellings (which equates to a maximum of 11 spaces in total for the proposed development). 6 car parking spaces are provided, which is below these maximum standards.

8.35 2011 Census data for Upper Norwood indicates that car ownership was 0.4 for 1 bedroom units, 0.69 for two bedroom units and 1.07 for three bedroom units. Factoring in the rise in car ownership (6% increase to 2018 from recent TFL data), it is calculated that the proposed development would have a likely car ownership of 8.42 vehicles. 6 Car parking spaces would be provided. This

suggests that there would be a potential overspill of 2/3 vehicles onto the public highway.

8.36 Paragraph 109 of the 2019 NPPF states that Development should only be prevented or refused on highways grounds if *“the residual cumulative impacts on the road network would be severe.”*

8.37 Downsview Road is free from parking restrictions, and at the time of the site visit, there was ample space to park vehicles safely on street and close to the site. A photo of Downsview road taken at the time of this visit is below:



8.38 As such, any overspill would not increase parking pressures to a ‘severe’ level and as such, no conflicts with paragraph 109 would arise.

8.39 In relation of cycle parking, London Plan standards would require 16 secure and covered cycle parking spaces. The development would provide these 16 spaces which would be secure, covered and easily accessible in line with these standards.

Sustainability and Flood Risk

8.40 Conditions can be attached to ensure that a 19% reduction in CO2 emissions over 2013 Building Regulations is achieved and mains water consumption would meet a target of 110 litres or less per head per day.

8.41 The site is partly located within an area with a high risk of surface water flooding. Policy DM25 of the Croydon Local Plan requires all development to incorporate sustainable drainage measures (SuDS).

- 8.42 A condition requiring additional site specific SuDS measures (eg rainwater collection/recycling, green roofs/walls etc) is also recommended. Subject to this, and combining this with the submitted landscaping scheme (implementation secured via condition), it is considered that there would be no material increase in flood risk and no conflict with adopted Policy.

Trees, Biodiversity and Ecology

- 8.43 A number of existing trees on the site would be lost (12). However, the trees that would be lost would be of low visual amenity value (category C or below), and the higher quality specimens (category B and above) would be retained and protected during development. It is noted that the Croydon Tree Officer did not raise any objections, subject to compliance with the tree protection plan and the submitted landscaping masterplan scheme (ref D162.001).

Waste/Recycling Facilities

- 8.44 The guidance set out in the Council's Suburban Design Guide (2019) advises that waste storage areas should be within 30m of the entrance of each residential units and within 20m of the public highway.
- 8.45 The application proposes a secure and covered waste storage area within 15m of the public highway and around 10m from the main entrance and which is of a suitable size to accommodate the development. As such, no objections are raised.

Other matters

- 8.46 All other planning related matters have been considered and no other planning harm has been identified.

Conclusion/Planning Balance

- 8.47 The proposed development would provide 8 new residential units, a large percentage of which would be suitable for small families. This adds a fair amount of weight in favour of the proposal. Subject to the recommended conditions, the development would not result in any material harm in terms of the character or appearance of the site or surrounding area, the amenities of surrounding residents, trees, flood risk or sustainability. The proposed development would potentially introduce some increase in on-street parking on surrounding road, but this would be minimal, would not conflict with adopted Policy and would not outweigh the benefits associated with the provision of the proposed residential units. As such, the development is considered acceptable and is therefore recommended for approval.