

PART 6: Planning Applications for Decision

Item 6.4

1.0 SUMMARY OF APPLICATION DETAILS

Ref: 20/01484/FUL
 Location: 67 Higher Drive, Purley, CR8 2HR
 Ward: Purley and Woodcote
 Description: Demolition of existing building and erection of a four storey block of flats (including roofspace accommodation) and associated car parking, cycle parking, bin storage and landscaping. The proposed development comprises 17 residential apartments and 13 car parking spaces.
 Drawing Nos: PL_001 00; PL_050 14; PL_100 12; PL_101 11; PL_102 11; PL_103 11; PL_200 11; PL_201 11; PL_202 11; PL_203 11; PL_300 11; PL_301 11; PL_302 11; CCL 10316 Rev 2
 Applicant: Macar Developments Ltd
 Agent: N/A
 Case Officer: Chris Stacey

	1B2P	2B3P	2B4P	3B5P	TOTAL
AFFORDABLE RENT	2	3	3	1	9
PRIVATE	1	1	5	1	8
TOTAL	3	4	8	2	17

Car parking spaces	Cycle parking spaces
13 (Inc. 2 blue badge)	28

- 1.1 This application is being reported to committee because objections above the threshold in the Committee Consideration Criteria have been received and because a Ward Councillor for Purley and Woodcote (Cllr Brew) made representations in accordance with the Committee Considerations Criteria and requested Planning Committee consideration.

2.0 RECOMMENDATION

- 2.1 That the Planning Committee resolve to GRANT planning permission subject to:

- A. The prior completion of a legal agreement to secure the following planning obligations:
- a) Provision of 52% affordable housing at London Affordable Rent;
 - b) Carbon offset payment of £25,937;
 - c) Sustainable transport contribution of £25,500 towards measures on Higher Drive and immediately surrounding area;
 - d) Air quality mitigation contribution of £1,700;

- e) Car club contribution of £5,000 towards provision in Purley and Kenley;
- f) S.278 works on Higher Drive;
- g) Local employment and training strategy (construction phase) including a financial contribution of £7,825;
- h) Monitoring fees totalling £6,188;
- i) Any other planning obligation(s) considered necessary by the Director of Planning and Strategic Transport.

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. Time limit of 3 years
- 2. Implemented in accordance with approved drawings
- 3. Submission of a construction management plan
- 4. Sustainable drainage measures
- 5. Land contamination
- 6. Ecology measures
- 7. Materials and detailing
- 8. Secure by design
- 9. Landscaping (including maintenance, external lighting, child play space and boundary treatments)
- 10. Cycle store and refuse store
- 11. Arboricultural measures
- 12. Public art
- 13. Travel plan
- 14. Energy strategy and carbon reduction (including details of PV panels)
- 15. Delivery and servicing plan
- 16. Parking management plan (including details of electric vehicle charging points)
- 17. Accessible homes
- 18. Obscure glazing and non-openable windows below 1.7m (where necessary)
- 19. 110litre water usage
- 20. Any other planning condition(s) considered necessary by the Director of Planning and Strategic Transport

Informatives

- 1. Community Infrastructure Levy
- 2. Subject to legal agreement
- 3. Code of practice for construction sites
- 4. Wildlife protection
- 5. Thames Water
- 6. London Fire Brigade
- 7. Refuse collection arrangements
- 8. Any other informative(s) considered necessary by the Director of Planning and Strategic Transport

2.3 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.

3.0 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The principle of intensifying the residential use of the existing site to provide a greater quantum of homes than existing is acceptable.
- The proposed development would provide 52% affordable housing (all to be delivered as London Affordable Rented homes) thereby providing a significant increase in new affordable homes within an existing residential area.
- The design and appearance of the development is acceptable and would evolve the local character whilst using land efficiently. Planning conditions are recommended to ensure that the development would use high quality materials, detailing and landscaping.
- The living standards for future occupiers would be acceptable and Nationally Described Space Standard (NDSS) compliant, with acceptable light and outlook levels, private amenity space, communal amenity space and child play space.
- The living conditions of adjoining occupiers would be protected from undue harm subject to conditions.
- The level of parking and impact upon the local transport network is considered acceptable subject to conditions and planning obligations.
- The proposal's impact on trees and biodiversity is acceptable subject to conditions. Suitable sustainability measures have been included and the development would be zero carbon (partly achieved planning obligations).
- The proposed flooding and sustainable drainage measures are acceptable subject to conditions.

4.0 SITE LOCATION AND PROPOSAL DETAILS

Site and Surroundings



Figure 1: Existing property

- 4.1 The application site measures 22m in width and 61m in depth, has an overall area of 0.14ha, and is currently occupied by a detached 5 bedroom two storey house. The site features a sloped garden to its front alongside a driveway, accessed via a dropped

kerb leading to area of hardstanding in front of the property and an attached garage on the north-west side of the property. A large rear garden sits to the rear of the existing property and features a slight rise in land level towards its rear, with the end of the rear garden sitting circa 4m higher than the front of the site.

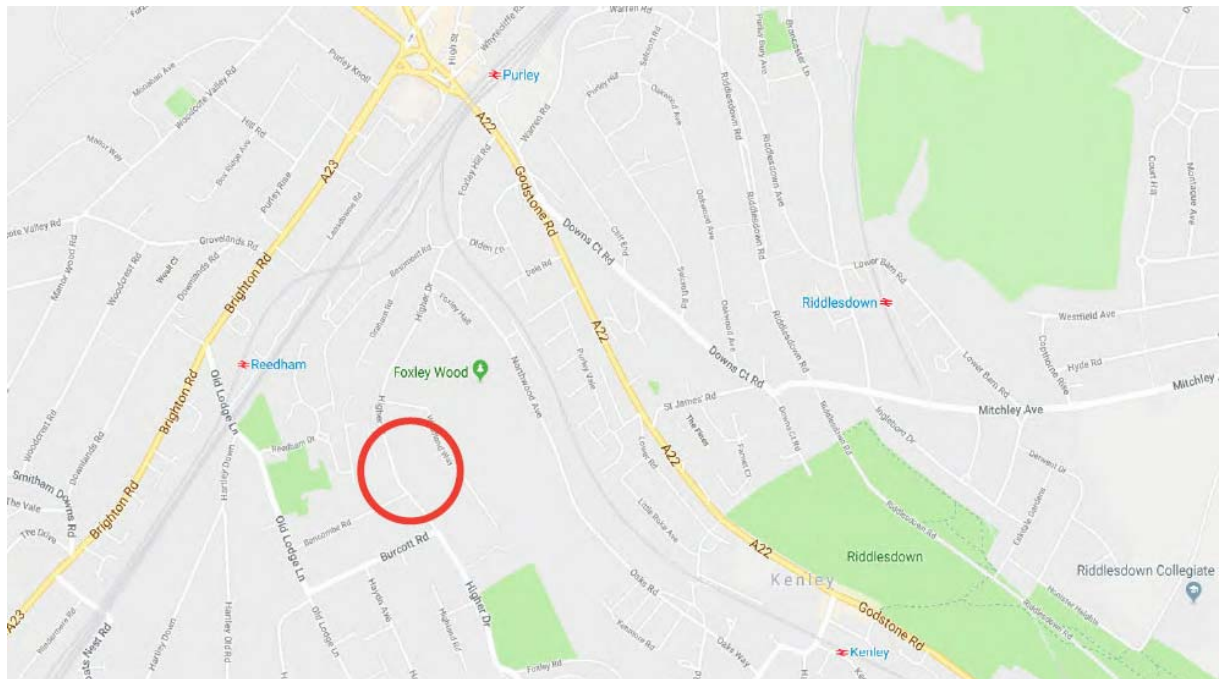


Figure 2: Location of site

- 4.2 The site sits on the east side of Higher Drive, a two-way steeply sloping residential street terminated by Foxley Hill Road in the north and Cullesden Road in the south, and sits approximately 1.1km south of Purley District Centre. The surrounding area is principally residential in character, featuring a variety of detached properties on large plots arranged in a similar fashion to the application site as well as a number of flatted blocks currently under construction. Whilst not currently under construction it should be noted that the site sits in close proximity (30m) to the recently consented proposals at 59-63 Higher Drive for 40 flats. Due to land level changes properties on the opposite side of Higher Drive sit at a lower level to those on the side of the road of the application site. St Barnabas Church and its grounds sits directly to the south of the application site and the Highfield House nursing home sits 400m further south. The site does not fall within a conservation area, nor does it sit in close proximity to any statutory listed buildings.

Proposal

- 4.3 The application seeks to demolish the existing two storey property and erect a four storey building (inclusive of accommodation within the roof level) accommodating seventeen homes.
- The proposal would comprise of 3 x 1 bedroom, 12 x 2 bedroom and 2 x 3 bedroom apartments, of which 52% would be London Affordable Rented homes (delivered through a S.106 planning obligation). The applicant has advised that the whole site is to be sold to Moat (a Registered Provider) and it is likely that 100% of these homes would become affordable in practice, although only 52% of these units has been committed to within the S.106 Agreement and the planning application must be determined on that basis.

- 13 parking spaces would be located to the front of the site, accessed via a replacement crossover (relocated to the centre of the site).
- A communal garden with child play space is proposed to the rear of the site.
- Refuse storage is located in a standalone screened store at the front of the site with cycle storage located to the rear of the site (accessed via an external side pathway).

Planning History

4.4 The following planning decisions are relevant to the application:

59-63 Higher Drive:

19/03282/FUL – Demolition of existing buildings, erection of a three/four/five storey building comprising 40 residential units, provision of 24 car parking spaces and associated refuse and cycle storage.

Permission granted January 2020, not yet implemented.

76 Higher Drive:

17/01641/FUL – Demolition of existing house: erection of two/three storey building with accommodation in roofspace comprising 6 two bedroom, 2 three bedroom and 1 one bedroom flats: formation of vehicular access and provision of associated parking.

Permission granted July 2017, currently under construction.

78 Higher Drive:

19/01837/FUL – Demolition of existing detached dwelling and erection of a three/four storey building to provide a total of 9 units as well as associated refuse and cycle stores, landscaping, vehicular access and car parking.

Permission granted August 2019, currently under construction.

5.0 CONSULTATION RESPONSE

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

5.2 The following were consulted regarding the application:

Designing Out Crime Officer

5.3 No objection subject to a condition requiring Secured by Design accreditation (which is recommended)

Ecology Advisor

5.4 No objection subject to conditions securing biodiversity mitigation and enhancement measures (which are recommended)

Local Lead Flood Authority

5.5 No objection subject to a pre-commencement condition (which is recommended)

London Fire Brigade

- 5.6 No objection subject to the proposal complying with the Building Regulations (an informative is recommended)

Thames Water

- 5.7 No objection subject to an informative in respect of discharging into a public sewer (which is recommended)

6.0 LOCAL REPRESENTATION

- 6.1 A total of 27 neighbouring properties were notified about the application and invited to comment and the application was also advertised by site notice and in the local press. The number of representations received from neighbours, local groups etc. in response to notification and publicity of the application were as follows:

No of individual responses: 40 Objecting: 40 Supporting: 0

No of petitions received: 0

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

SUMMARY OF OBJECTIONS	RESPONSE
Principle of development	
Overdevelopment / in excess of density range	Please refer to paragraph 8.7 of this report
Insufficient information regarding affordable housing	The proposal would provide 52% affordable housing (by habitable room) at London Affordable Rent levels
Loss of existing family home	The proposed development would result in a net uplift in family accommodation
The proposed mix of housing is not policy compliant	Please refer to paragraph 8.6 of this report
This level of intensification is not justifiable following reduction in London Plan housing targets	Please refer to paragraph 8.2 of this report
Design	
Adverse impact on character of area	Please refer to paragraphs 8.8 – 8.17 of this report
Height and massing is unacceptable	Please refer to paragraphs 8.11 – 8.13 of this report
Poor quality of proposed accommodation	Please refer to paragraphs 8.18 – 8.21 of this report
Insufficient child play space	The proposed child play space is in excess of the required standards
The architectural style of the proposal is not in keeping with the area	Please refer to paragraphs 8.14 – 8.17 of this report
Amenity	
Negative impact on neighbouring amenity	Please refer to paragraphs 8.22 – 8.26 of this report

Overlooking	Please refer to paragraphs 8.22 – 8.26 of this report
Impacts on neighbouring daylight	Please refer to paragraphs 8.22 – 8.26 of this report
Increase in noise levels	The proposal is for a C3 (residential) use and would therefore not introduce noise levels which would be incompatible with other C3 (residential) uses
Disturbance from construction	A condition is recommended requiring the submission of a construction management plan prior to the commencement of works
Highways & Parking	
Insufficient car parking	Please refer to paragraphs 8.31 – 8.32 of this report
Parking survey is inadequate	The submitted parking survey has been undertaken in accordance with the 'Lambeth Methodology'
Negative impact on highway safety	Please refer to paragraphs 8.28 – 8.30 of this report
Site is atop a steep hill with no public transport	The site's location does not prevent the site from being suitable for residential intensification in principle (given there are no policy constraints preventing such development in this location) with this section of Higher Drive already being an established residential area
No provision for electric vehicles	A policy compliant level of electric vehicle charging points are proposed
Other matters	
Impact upon local infrastructure	The proposed development would be CIL liable which assists in delivering infrastructure in the local area
Loss of natural vegetation and natural habitat	Please refer to paragraphs 8.36 – 8.39 of this report
Existing property has a roosting bat population	Please refer to paragraph 8.39 of this report
Detrimental impact on trees	Please refer to paragraphs 8.36 – 8.38 of this report
Cumulative impact of development	The cumulative impact of this development and other developments consented within the immediate local area has been taken into consideration and is referred to where such impacts would be relevant within this report
Impact on neighbouring foundations	This is a civil matter and is not a material planning consideration
Will increase flooding in the area	The proposed development would incorporate SUDS measures. Please refer to paragraph 8.41 of this report.

No provision for renewable energy sources	The proposed development would be net zero carbon. Please refer to paragraph 8.40 of this report
Pre-application advice has been ignored	Officers are content that the substantive issues raised at pre-application stage have been suitably addressed within this application which allow it to be recommended for approval
Significant information to determine the application is missing	Sufficient information to allow for the determination of the application has been submitted
Inaccurate information submitted with the application	Sufficient information to allow for the determination of the application has been submitted
Flats are not suitable given the current COVID-19 pandemic	Flats form a substantial part of Croydon's existing stock and are essential to assist the borough in meeting housing need.

6.3 Councillor Brew requested that the application be heard at planning committee and made the following representations:

- Overdevelopment
- Cumulative impact of development in the immediate surroundings
- The affordable housing provision on site must be confirmed
- Insufficient car parking
- Inadequate parking stress survey
- Very poor PTAL rating

6.4 Foxley Residents Association made the following representations:

- Overdevelopment
- Insufficient provision of family sized homes
- Cumulative impact of development in the immediate surroundings
- Insufficient car parking
- Inadequate parking stress survey
- Adverse impact on highway safety
- Adverse impact on neighbouring amenity

6.5 Purley & Woodcote Association made the following representations:

- Loss of a family home
- Overdevelopment due to increased built area of site and inadequate amenity space for future occupiers
- Design is out of keeping with locality
- Adverse amenity impacts for adjoining properties
- Inadequate car parking
- Adverse impact on highway safety
- Cumulative impact of development in the immediate surroundings

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.

National Guidance

- 7.2 Government guidance is contained in the National Planning Policy Framework (**NPPF**) revised in February 2019. The NPPF sets out a presumption in favour of sustainable development, requiring that development which accords with an up to date local plan should be approved without delay. The NPPF identifies a number of key issues for the delivery of sustainable development, those most relevant to this case are:

- Delivering a sufficient supply of homes;
- Promoting healthy and safe communities;
- Promoting sustainable transport;
- Making effective use of land;
- Achieving well-designed places.

Development Plan

- 7.3 The Development Plan comprises the Croydon Local Plan 2018 (**CLP**), the London Plan 2016 (**LP**), and the South London Waste Plan 2012 (**SLWP**).
- 7.4 A replacement for the LP, in the form of the New London Plan 2019 (**NLP**) has been subject to public consultation and an examination in public (EiP). Subsequently the Mayor's Intend to Publish NLP has been published following on from the Planning Inspector's Panel Report, with the Secretary of State subsequently commenting on the Mayor's Intend to Publish NLP. Whilst the NLP is yet to be formally adopted, it is close to adoption and whilst the weight afforded to it is down to the decision maker, its weight continues to increase as it gets closer to adoption.
- 7.5 Of particular relevance to this proposal is the Council's Suburban Design Guide 2019 (**SDG**) which is a supplementary planning document (SPD) intended to provide supplementary guidance to the CLP.
- 7.6 A full list of relevant policies are included in Appendix 1 of this report.

8.0 MATERIAL PLANNING CONSIDERATIONS

- 8.1 The main planning issues raised by the application that the committee must consider are:
1. Principle of Development
 2. Housing Tenure, Mix and Density
 3. Design and Appearance
 4. Housing Quality
 5. Impact on Surrounding Neighbours
 6. Highways, Parking and Refuse
 7. Trees, Landscaping, Biodiversity and Sustainability
 8. Flood Risk and Sustainable Drainage

9. Other Matters

Principle of Development

- 8.2 The site's existing use is residential and as such the proposed redevelopment of the site for residential purposes is acceptable. Policy SP2.2 of the CLP states that the Council will seek to deliver a minimum of 32,890 homes between 2016 and 2036, equating to 1,645 homes per year, with 10,060 of said homes being delivered across the borough on windfall sites (i.e. non allocated sites outside of the Croydon Opportunity Area – such as this application site), and equating to 503 homes per year. The emerging NLP sets a housing target for Croydon of 20,790 homes (reduced from the previously proposed 29,490 homes) between 2019 and 2029, equating to 2,079 homes per year, which includes a “small sites” target of 6,470, equating to 647 homes per year, which is an increase on the Council's current windfall target. Given the above the principle of intensifying the residential use of the existing site to provide a greater quantum of homes than existing is acceptable.

Housing Tenure, Mix and Density

- 8.3 Policies SP2.4 and SP2.5 of the CLP state that on sites of ten or more dwellings the Council will seek a minimum of 30% affordable housing, but negotiate to achieve up to 50% affordable housing (subject to viability), and seek a 60:40 split between affordable rented homes and intermediate (including starter) homes.
- 8.4 The proposed scheme seeks to provide 9 affordable homes which represents 52% of the total housing proposed by habitable room at a split of 100% affordable rented. Given that the quantum of affordable housing proposed is in excess of the requirements of SP2.4 of the CLP (which is strongly supported) a viability appraisal has not been undertaken. The affordable rented provision is proposed in the form of London Affordable Rent units, a low cost rented product supported by the Mayor of London which is based on social rent levels which are considerably lower than typical affordable rent levels, which can be set at up to 80% of market rent levels, and represents a form of affordable housing that is genuinely affordable to people on low incomes.

	Market	Affordable (London Affordable Rent)
Units	8	9
As a %	47%	53%
Habitable Rooms	24	26
As a %	48%	52%

Fig. 3 Proposed tenure split

- 8.4 Whilst the proposed affordable housing tenure split differs from that set out in policy SP2.4 of the CLP, given that 100% of the proposed affordable housing would be provided as affordable rented (in the form of London Affordable Rent) which is both a more affordable product and for which Croydon has a greater need, and which Moat

(a Registered Provider) has requested on this site, the proposed tenure split is supported and can be afforded substantial weight in the determination of this application given the benefits arising from this provision.

- 8.5 Officers understand, as set out in paragraph 4.3 above, that the site is to be sold to Moat who intend to deliver the whole scheme as affordable housing. The s106 agreement and planning permission would only secure 52% of units as affordable housing (being the reasonable maximum in policy terms) and so no weight should be attached to the potential for the other 8 units potentially being delivered as affordable housing as this would not be controlled by the planning permission.
- 8.6 The existing property which is to be demolished is a 5 bedroom property measuring circa 200sqm and can be classified as a family home. Whilst policy DM1.2 of the CLP only seeks to prevent the loss of 3 bedroom homes (as originally built) and homes smaller than 130sqm, which the proposal would not conflict with, there is an expectation (in line with the strategic objectives of the CLP as set in policy SP2.7) that all developments will contribute towards the delivery of family housing (i.e. homes with 3 or more bedrooms) and in order to achieve this proposals would not be supported where they result in a net loss of family housing (which would otherwise discord with this strategic objective). In this instance the proposed development would provide 2 x 3 bedroom homes and would thus result in a net uplift in family housing on the site.
- 8.7 As the site sits within a 'suburban setting' with a PTAL of 1b, in accordance with Table 4.1 of policy DM1.1 of the CLP, major proposals in this location are required to provide a minimum of 70% 3 bedroom homes unless there is an agreement with the associated affordable housing provider that 3 or more bedroom dwellings are neither viable nor needed as part of the affordable housing element of any proposal, or; within three years of the adoption of this plan, where a viability assessment demonstrates that larger homes would not be viable, an element may be substituted by 2b4p homes. In this instance Moat (a Registered Provider) has confirmed that the proposed mix (which only includes a 3 bedroom home provision of 11.8%) represents their identified need in this location for affordable housing provision. Given that it is understood that it is likely that 100% of these homes would become affordable in practice, such a mix can be supported in line with the exceptions to the preferred mix outlined by policy DM1.1 of the CLP which allows for an alternative mix where requested by a Registered Provider. Furthermore it should also be noted that 8 of the proposed units would be 2b4p homes, and when this is taken into account alongside the 2 x 3 bedroom homes, 60% of the proposed homes overall would be in the form of either 2b4p or 3 bedroom homes. Given the above the proposed mix can be supported.

	Affordable	Market	Total
1b2p	2	1	3
<i>As a %</i>	22.2	12.5	17.7
2b3p	3	1	4
<i>As a %</i>	33.3	12.5	23.5
2b4p	3	5	8

As a %	33.3	62.5	47
3b5p	1	1	2
As a %	11.2	12.5	11.8
Total	9	8	17

Fig. 4 Proposed mix by tenure

- 8.8 With respect to density, the site's setting can be classed as 'suburban' and given its PTAL of 1b a recommended density level range is between 150-200 habitable rooms per hectare (hr/ha) in accordance with Table 3.2 of the LP. The proposal has a density of 357 hr/ha, and whilst this is clearly above the recommended density level for a location such as this, it should be noted that the density matrix should not be applied mechanistically with developments only being refused where they demonstrate clear characteristics of overdevelopment (for example poor quality accommodation), with the LP providing sufficient flexibility for such higher density schemes to be supported. In this instance such characteristics are not deemed to be present, with the proposed development considered to provide a good standard of accommodation for future occupiers and as such there is no objection to the proposal's density level. It should also be noted that the density matrix does not form a part of the NLP (which is due to be adopted shortly replacing the LP) which arguably limits the level of weight that can be afforded to the density matrix in any regard.

Design and Appearance

Layout

- 8.9 The proposed layout of the development includes the provision of a single flatted block notably set back from the street in a similar manner to the existing house. Car parking is provided at the front of the site, whilst a communal garden and child play area is located to the rear of the building. Cycle parking is also located at the rear of the site accessed via a 1.2m wide footpath to the side of the building.

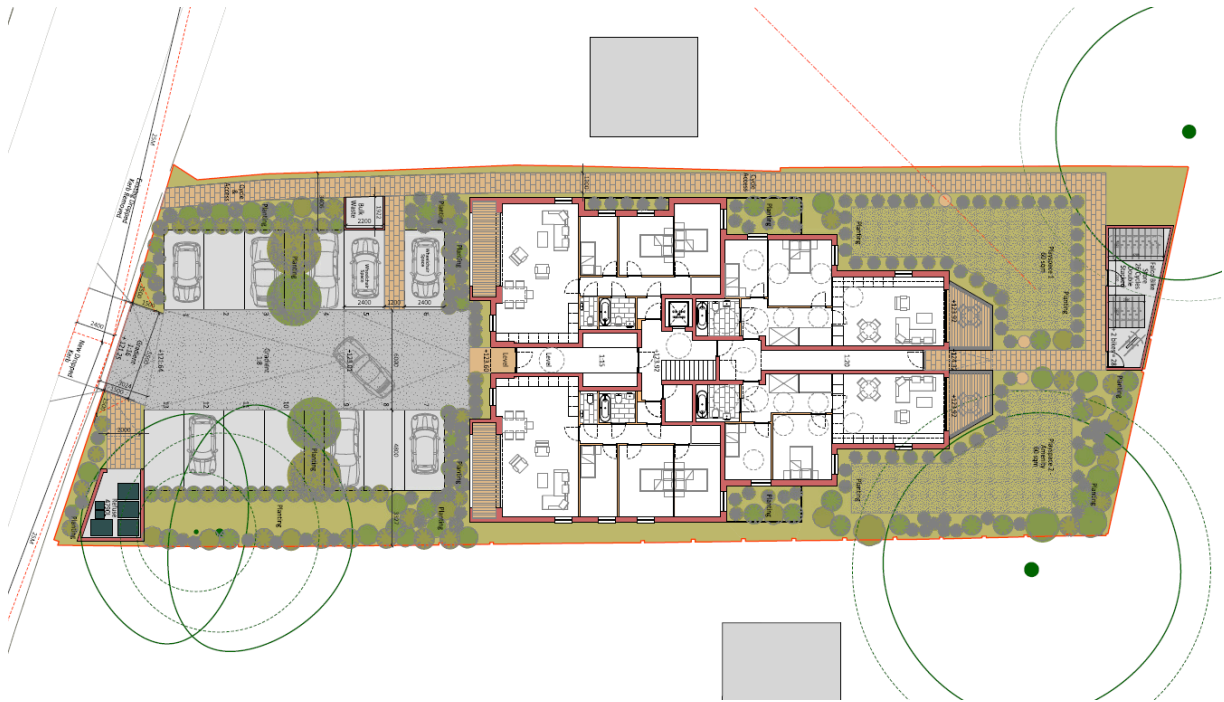


Figure 5: Proposed site plan

- 8.10 As previously noted the proposed front building line is notably set back from the street which is characteristic of this part of Higher Drive, with the proposed front building mediating between that of 65 Higher Drive and St Barnabas Church, which would be compliant with the guidance regarding building lines set out in the CLP and SDG. Whilst the rear projecting portion of the building (which features two steps) does notably project beyond the rear building line of both the existing property and that of the neighbouring property at 65 Higher Drive it, given the notable separation distances between the proposed building and the existing property at 65 Higher Drive, does respect the 45 degree angle from the nearest windows of 65 Higher Drive. A gap of 1.8m and 1.2m between each side of the building and the respective boundaries to 65 Higher Drive and St Barnabas Church has been proposed according with the relevant guidance regarding relationships to neighbouring boundaries in the SDG. Access to the building is via a communal entrance located in the centre of the front façade which provides direct access to both the car parking area and street. Direct access from the building to the communal garden and child play area is provided via a centrally located corridor leading out to a pathway at the rear of the building located in the centre of the site.
- 8.11 The proposed land levels largely follow the existing topography of the site and that of the neighbouring sites sloping up gradually from the site's street frontage to its rear. This arrangement both allows for step free access using shallow gradient levels that allow ease of access whilst negating the requirement for large retaining walls which would adversely impact upon the streetscene.
- 8.12 The front of the site will feature an area of hardstanding rising from street level towards the building accommodating car parking for the proposed development, accessed via a replacement crossover (relocated to the centre of the site). Planting along the front boundary, within the car park and to the front of the building is proposed along with planting adjacent to the boundary of the site with St Barnabas Church, is proposed to soften the overall appearance of the front of the site, with two of the existing Horse

Chestnut trees (adjacent to St Barnabas Church) proposed to be retained. Whilst the refuse store is to be located at the front of the site it would be a low level structure and would also be sufficiently screened by soft landscaping to its front. The area to the rear of the building will be predominantly soft landscaped and will house the communal amenity and child play space provision, along with a secure cycle store containing 28 cycle parking spaces for the proposed flats.

Scale, Height and Massing

- 8.13 Policy DM10.1 of the CLP requires proposals to respect the scale, height and massing of the surrounding area, whilst seeking to achieve a minimum height of 3 storeys. Section 2.10 of the SDG provides further guidance for suburban residential developments (such as this proposal) stating that where surrounding buildings are predominantly detached dwellings of 2 or more storeys, new developments may be 3 storeys with an additional floor contained within the roof space or set back from the building envelope below. Furthermore the SDG also states that developments do not necessarily need to step down in height towards neighbouring buildings of a lesser height.



Figure 6: Extract from the SDG



Figure 7: Proposed street scene

- 8.14 The proposed building would feature 4 storeys fronting Higher Drive with the top storey being located within the pitched roof form. The ridge height would be slightly higher than that of 65 Higher Drive and would only be marginally higher than St Barnabas Church, however such differentiations in height between neighbouring properties in the local context (especially when surrounding consents are taken into account) are not uncommon, and the overall height of the proposed building is not considered to result in a negative impact upon the character and would be of a height that suitably complements its immediate surroundings. As such the scale, height and massing of the building as presented to Higher Drive strikes an appropriate balance between

respecting the local character whilst intensifying and optimising the development potential of the site, and is thus acceptable.



Figure 8: Proposed site section

- 8.15 The rear portion of the building features two notable steps, in height and width, to reduce the overall massing of the projecting elements of the building and gives this portion of the building a subservient appearance to the main portion of the massing at the front of the site. The first step, whilst still 4 storeys features a step down in the ridge height of the building, whilst the second step features a reduction of a floor housing three storeys with the top storey being located within the pitched roof form. Given the above measures, the scale, height and massing of the rear portion of the building is acceptable and would accord with the relevant sections of the CLP and the SDG.

Appearance and Materials

- 8.16 The proposed architectural approach for the development incorporates a mixture of sympathetic and faithful and contemporary reinterpretation elements (as defined in section 2.8 of the SDG), through respecting and referencing the surrounding character of the area, in terms of the building's form, material palette and detailing, whilst at the same time introducing aspects of contemporary detailing to ensure that the proposal is not simply a pastiche of surrounding buildings. Such an approach to the appearance of the proposed development is considered appropriate in this instance and would complement and respect the character of the surrounding area.
- 8.17 The proposed roof form of the building would be pitched, featuring forward facing gables and hipped roofs (features commonly found within the local area). The respective features of the roof form are well proportioned against the rest of the proposals, are well rationalised and not overcomplicated, and accord with the relevant guidance set out in both the CLP and SDG.
- 8.18 The proposed material palette consists principally of multi-stock red / dark brown bricks and dark brown tile hanging (materials commonly found within the local area) as well detailed features such as brick banding and feature brickwork to the main entrance of the building. The proposed material palette and detailing is well considered, would complement the surrounding character, and would accord with relevant guidance in the SDG. A condition requiring the submission of samples and the specification of the final materials, alongside detailed drawings of reveal depths and key junctions/features (such as the feature brickwork to the main entrance) has been recommended. A mixture of setts and slabs would form the proposed hardscaping alongside soft landscaping features, with a condition requiring the submission of samples of such

details alongside details of maintenance measures and any external lighting being recommended.

- 8.19 In order to respect the character of the street and the locality, balconies have been inset and incorporated holistically into the design of building as opposed to being projecting features which can appear stuck on and would be out of keeping in a suburban location such as this. Low level brick walls which form a part of the façade topped by metal balustrading are proposed, with such a treatment deemed to be acceptable as it evident that the proposed balcony design has been treated as an integral part of the design and thus follows the guidance set out in the SDG.

Housing Quality

- 8.20 As outlined by Figure 9 below almost all of the proposed units would meet or exceed the internal floor area and private amenity space standards set out by both the Nationally Described Space Standards (NDSS) and Table 6.2 in the CLP. 2 x 2b3p homes would be marginally under the private amenity space standards (by 0.5sqm), however would be internally oversized to compensate for this – as such they would provide an appropriate level of residential amenity for their future occupiers.

	Internal Floor Area		Private Amenity Space	
	Requirement	Proposed	Requirement	Proposed
FLATS 6, 11 & 17 (1B2P)	50sqm	50-53sqm	5sqm	11-18sqm
FLATS 3, 4, 13 & 14 (2B3P)	61sqm	62-70sqm	6sqm	5.5-7.5sqm
FLATS 5, 7, 8, 9, 10, 12, 15 & 16 (2B4P)	70sqm	70-77sqm	7sqm	7.5-8.8sqm
FLATS 1 & 2 (3B5P)	86sqm	90-95sqm	8sqm	8.8sqm

Figure 9: Internal floor area and private amenity space

- 8.21 All of the proposed units would be either dual or triple aspect with the exception of 2 x 1 bedroom homes, although both of these units would be south-west facing and still have access to good light, outlook and ventilation so overall would provide a high standard of accommodation for their future occupiers. An internal daylight and sunlight assessment accompanies the application and confirms that all of the habitable rooms to all units proposed would meet or exceed the recommended average daylight factor (ADF) levels specified by BRE. Where units are located at ground floor level adjacent to communal areas suitable areas of defensible planting have been incorporated in order to ensure that the privacy of future occupiers is suitably protected.
- 8.22 Communal amenity space and child play space is located to the rear of the building and can be directly accessed from within the building via a centrally located corridor leading out to a footpath at the rear of the building in accordance with the guidance contained within the SDG. In line with Table 6.2 of the CLP the proposed development would be required to provide 80.8sqm of child play space, and the proposed development would provide an area dedicated to child play space of 120sqm which

exceeds this. A condition requiring the submission of further information and details in relation to the proposed communal amenity space and child play space is recommended.

8.23 In terms of accessibility, step free access would be provided from street to the front door through the use of suitably graded ramps externally. At the rear of the building suitably graded ramps would also be used to ensure step free access from the building to all other facilities, including the child play area and communal garden as well as the cycle store. Within the building all of the proposed units would benefit from level access due to the inclusion of a lift, with two of the ground floor units designed to be wheelchair adaptable/accessible (in accordance with Part M4(3) of the Building Regulations) and all other units designed to be adaptable/accessible (in accordance with Part M4(2) of the Building Regulations). Such provision would accord with both the LP and NLP and would be secured via condition. To serve the two wheelchair adaptable/accessible units proposed, two blue badge car parking spaces with the necessary clear zones around them have been proposed to the front of the site.

8.24 It is recognised that the existing use of the church hall to the south of site could include noisy activities from time to time, however its presence is not considered to negatively impact upon future occupiers of the proposed development given that the church hall already sits within an established residential location and that other regulations outside of the planning system regulate noise disturbances from such uses.

Impact on Surrounding Neighbours

8.25 There are a number of properties that surround the site which include 65 Higher Drive to the north-west, 8 and 10a Woodland Way to the north-east and 17 Callow Field and 72a and 74a Higher Drive to the south-west as illustrated in Figure 10 below.



Figure 10: Surrounding neighbours

65 Higher Drive

8.26 65 Higher Drive sits on the north-west side of the application site, with the main property sitting 10m from the site boundary, between which sits a detached double garage and access path to the rear garden. There are a total of 4 side windows on its south-east elevation (i.e. the flank elevation adjacent to the application site), one at ground floor level and 3 small windows at first and second floor levels. Whilst the positioning, sizing and external appearance of these windows would give the appearance that said windows are either secondary or serve non-habitable rooms, a daylight and sunlight assessment has nonetheless tested the impact of the proposed development upon these windows and concluded that given the generous separation distance between this property and the proposed development, these windows would continue to achieve daylight and sunlight levels in accordance with BRE requirements. The front building line of the proposed development would sit 7m forward of the front elevation of 65 Higher Drive (to align closer to the predominant building line on this side of Higher Drive), however due to the notable distance between the proposed building and the closest habitable room window on the front elevation of 65 Higher Drive the proposed building would not result in unacceptable amenity impacts for 65 Higher Drive at its front. The rear building line of the proposed building features a number of setbacks with its rearmost building line sitting 13m beyond the rear elevation of 65 Higher Drive, however given the notable separation distances between the proposed building and this property, a 45 degree line (taken from the centre point of the closest habitable room window on the rear elevation of 65 Higher Drive outlined in Figure 11) demonstrates that the proposed building would not breach this line in either plan nor elevation (in accordance with the SDG). Furthermore a daylight and sunlight assessment has also concluded that the rear facing windows closest to the application site would continue to achieve daylight and sunlight levels in accordance with BRE requirements. As such the proposed development would therefore not result in unacceptable amenity impacts for 65 Higher Drive at its rear.



Figure 11: 45 degree line to 65 Higher Drive in plan and elevation

- 8.27 The side elevation of the proposed building facing 65 Higher Drive features a number of side windows at both ground and the upper floor levels. On the upper floor levels the majority of the proposed side windows are secondary windows to a room served by a front or rear facing primary window, however there are a few instances where said windows serve a second bedroom. A condition is recommended requiring that all upper floor side facing windows would need to be obscured glazed and non-openable below 1.7m in order to suitably protect the amenity of 65 Higher Drive. With respect to the balconies/terraces that sit on the rear elevation of the proposed building adjacent to 65 Higher Drive, the terrace at ground level would sit well below the existing fence line, whilst the balconies on the upper levels would be inset to minimise overlooking and a condition requiring details of screening to the side elevations of said balconies is also recommended to prevent any direct overlooking.

17 Callow Field and 72a and 74a Higher Drive

- 8.28 These properties are located opposite the site with the separation distance between these properties and the proposal being in excess of 40m and including the presence of a road and landscaping. Given the degree of separation between the proposed development and these properties, the proposals would not result in unacceptable amenity impacts for these properties.

8 and 10a Woodland Way

- 8.29 These properties are located to the rear of the site with the separation distance between these properties and the proposed rear building line of the proposed building being in excess of 30m. Furthermore there is significant established vegetation located between the application site and these properties which is to be retained. As such the proposals would not result in unacceptable amenity impacts for these properties.

St Barnabas Church and Hall

- 8.30 To the south of the site is located St Barnabas Church and Church Hall. These premises are not in a residential use and so the impact on them would be limited. Whilst protected by the CLP as community uses, were they to be redeveloped at some point in the future, the proposal is not considered to significantly prejudice this site given that obscure glazed windows are proposed to the upper levels of the proposed development.

Highways, Parking and Refuse

- 8.31 The site has a PTAL of 1b representing a poor level of public transport accessibility, sits approximately 1km south of Purley rail station and 750m south-east of Reedham rail station, and sits approximately 350m from the closest bus stop on Old Lodge Lane. Higher Drive is a non-classified two-way steeply sloping residential street terminated by Foxley Hill Road to the north and Cullesden Road to the south. The site does not fall within a Controlled Parking Zone (CPZ) and Higher Drive is not currently subject to any parking restrictions.
- 8.32 Vehicle access to the site is currently via a driveway and dropped kerb on the north side of the site (adjacent to 65 Higher Drive). The proposed development seeks to relocate the vehicular access to a centrally located position at the front of the site at a 90 degree angle to the public highway and widen it to 5.5m. The submitted drawings have suitably demonstrated that the appropriate visibility splays for both pedestrians

and vehicles can be achieved. Works to widen the existing vehicle crossover to take into account the relocated and widened access point, along with upgrades to the section of pavement immediately outside the application site, will be carried out under a S.278 agreement between the applicant and the Council and will be secured under the S.106 agreement. Vehicular tracking diagrams have been provided with the application and demonstrate that sufficient space to accommodate the necessary vehicular movements within the forecourt at the front of the site has been provided. Furthermore the Council's highways officer has confirmed that the gradients of the proposed ramps within the front forecourt parking are compliant with relevant guidance.

- 8.33 In respect of trip generation the proposed development is expected to generate in the region of 85 vehicular trips per day (comprising of both inbound and outbound trips), with approximately 3-4 of these trips occurring during both the morning and afternoon peak periods. Given the level of vehicular trip generation expected from the proposed development and taking into account the cumulative impact of surrounding recent consents, the Council's highways officer has confirmed that the level of vehicular trip generation from this proposal would not adversely impact the operation of Higher Drive nor the surrounding road network. In order to further mitigate and assist in reducing car use from both this development and within the local area a Travel Plan will be secured via condition (promoting the use of sustainable transport modes for future residents) and a Sustainable Transport Contribution of £25,500 will be secured through the S.106 agreement and be used towards the implementation of parking restrictions on Higher Drive and the introduction of a bus route along Higher Drive. Additionally a contribution of £5,000 towards funding a network of car club bays within the Purley and Kenley area will also be secured through the S.106 agreement. Such measures are considered to reasonably mitigate against any increase in vehicle trip generation from the proposed development and potentially allow for a reduction in this figure in the future.
- 8.34 A number of concerns have been raised in representations in respect of road collisions and issues with speeding vehicles along Higher Drive. Given the relatively low level of trip generation, and with conditions to ensure the safe design of the access, the scheme is not considered likely to significantly exacerbate concerns of vehicle collisions from vehicles entering the highway, so officers are satisfied that this element of the proposal is acceptable. Higher Drive, whilst being on a slope and relatively well used, is an adopted highway and the proposal is not considered to lead to additional trips likely to make the use of the road unsafe. The conduct of vehicles on the highway, in terms of speeding etc. is unlikely to be significantly affected by the proposal and is best managed through other means outside of the planning process.
- 8.35 Table 6.2 of the LP sets out maximum car parking standards for residential developments. This states that 1-2 bedroom properties should provide less than 1 space per unit, with up to 1.5 spaces per unit being provided for 3 bedroom properties. In line with the LP the proposed development could therefore provide up to a maximum of 18 spaces. It is important to note however that it is not necessarily desirable to provide car parking up to the maximum standards given the ambitions of both the LP and CLP to reduce reliance on car usage and promote/prioritise sustainable modes of transport. In this instance it also needs to be borne in mind that policy DM30 of the CLP accepts 2/3rds car parking provision for the affordable element of a development which would reduce the aforementioned figure to 15 spaces given the quantum of affordable housing proposed to be secured through the S.106 agreement.

- 8.36 The proposed development would provide a total of 13 spaces (including 2 blue badge spaces and electric vehicle charging facilities) and based on the above paragraph a degree of parking 'overspill' could occur which would need to be accommodated on-street in the locality. In order to demonstrate the impact of the development on on-street parking stress, a parking stress survey in accordance with the established Lambeth Methodology has been submitted. The existing overnight parking stress within 200m of the application site states that out of a capacity of 195 on-street parking spaces available 167 are vacant (representing a stress level of 14%), and when recently consented developments in the vicinity of this site are taken into account (bearing in mind their anticipated parking 'overspill' levels) this reduces to an availability of 145 spaces (representing a stress level of 26%). As has been noted above it is the Council's intention to introduce parking restrictions along Higher Drive to facilitate the provision of a bus route, and such restrictions could involve applying double yellow lines to one side of Higher Drive. Such an intervention would obviously decrease the availability of on-street parking within the vicinity of the site by around 50%, and thus would likely increase overall parking stress to in the region of 52%. Even in this circumstance however it is clear that there is sufficient on-street capacity to accommodate the anticipated level of parking 'overspill' of this development, and that the proposed development would not increase parking stress levels to an unacceptable level. In light of the above the proposed car parking provision and the proposal's impact upon the local highway network would be acceptable. It is also noted that a number of measures, such as the potential introduction of a bus route, car club provision and travel plan would all be aimed at reducing use of private motor cars and so the amount of parking necessary.
- 8.37 In respect of cycle parking the proposed development provides a total of 28 cycle parking spaces in a secure standalone cycle store at the rear of the site accessed via an external pathway along the northern edge of the site and also accessible directly from the communal core of the building. Whilst the overall quantum of cycle parking would fall marginally short (by 3 spaces) of LP and CLP standards, an increased scale of cycle store would impact upon the communal amenity and child play space at the rear of the site, and given the topography of the local area, the level of cycle parking provision for the proposed development would likely be sufficient and on balance is thus acceptable. In the event that demand exceeded the capacity provided sufficient space is available to provide additional cycle parking spaces, and the ongoing monitoring of the Travel Plan would ensure that this situation is regularly reviewed. Of the 28 cycle parking spaces proposed, 26 of these would be in the form of double stacking bays with 2 Sheffield stands allowing those less mobile to store their bikes within the communal cycle store. A condition is recommended requiring further details of the proposed cycle store.
- 8.38 With respect to refuse storage, a dedicated refuse store has been located at the front of the site, accessed via a dedicated pathway, and would be suitably screened behind soft landscaping so as not to adversely impact upon the street scene. The proposed store would be within 30m of the proposed building and within 20m of the collection point on street. An area identified for the storage of bulky waste items has also been proposed on the north side of the site, accessed via an external pathway. The proposed refuse provision would provide the requisite level of refuse storage for the proposed development and would accord with policy DM13 of the CLP.

8.39 It is anticipated that deliveries and servicing of the site would take place on-street, reflecting the existing arrangements and that of many proposals consented within the local area. In respect of construction management a full detailed Construction Logistics Plan would be required by planning condition to be submitted for the Council's approval prior to the commencement of development.

Trees, Landscaping, Biodiversity and Sustainability

8.40 There are currently a total of 14 trees on or within the immediate vicinity of the site as identified by the tree survey schedule contained within the submitted Arboricultural Report. These include 2 Category A trees (sited within the grounds of 65 Higher Drive and St Barnabas Church); 2 Category B trees; 9 Category C trees and 1 Category U tree, and are highlighted in Figure 12 below. Whilst none of these trees are the subject of a Tree Preservation Order (TPO) it should be noted that the trees contained within both 8 and 10 Woodland Way to the rear of the site are the subject of an area TPO.

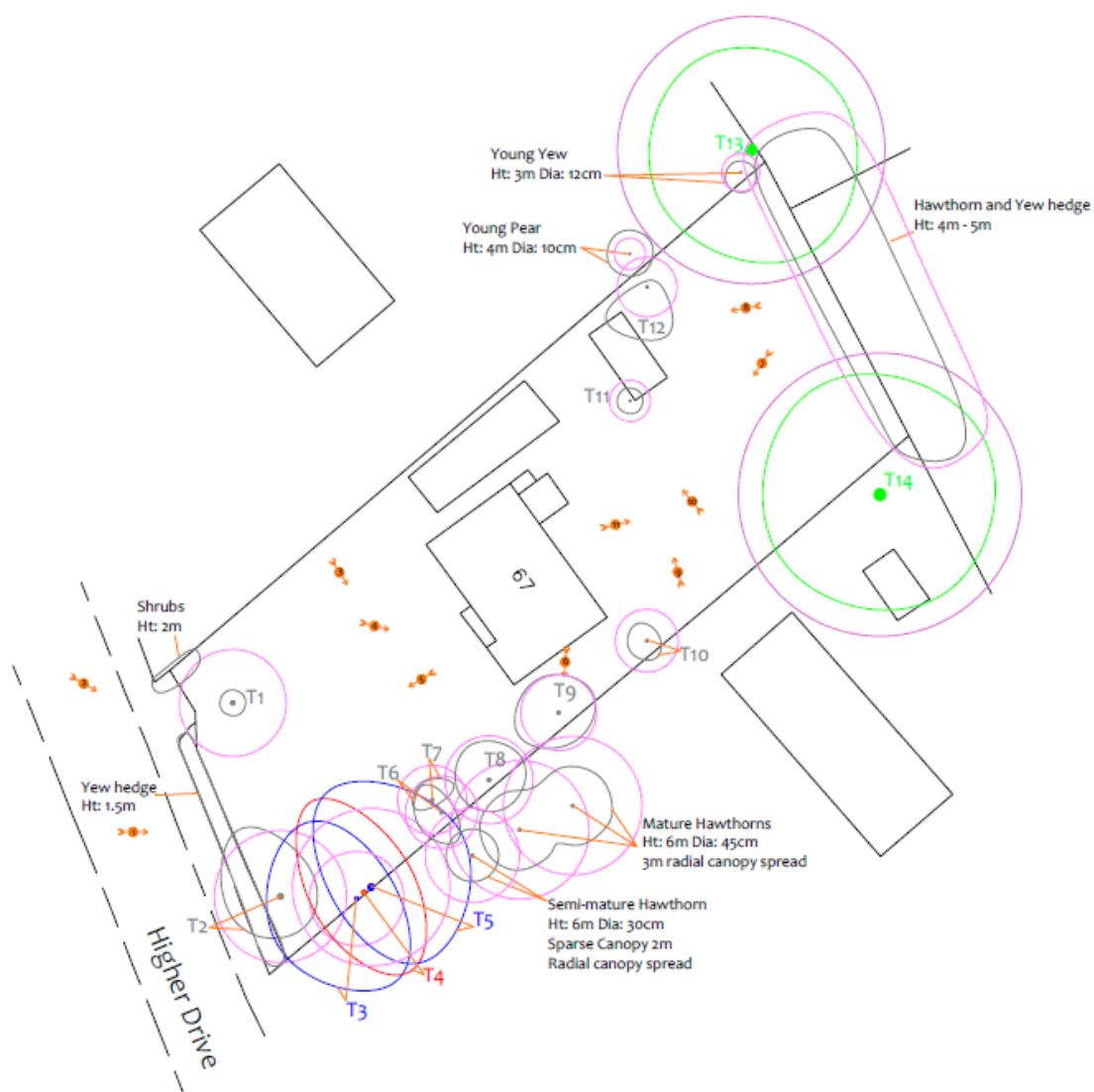


Figure 12: Existing tree survey

8.41 The proposed development seeks to remove 7 of the existing trees (none of them covered by the TPO) as well as a low Yew hedge at the front of the site. 6 of the existing trees which are to be removed are classed as Category C trees, with the remaining 1

being classed as a Category U tree. Given the low quality of the trees and hedges that are proposed to be removed, their removal is acceptable. In order to mitigate for the loss of the aforementioned trees and enhance the landscaping quality of the site, the proposal seeks to plant both an additional 4 mature trees within the front forecourt of the site (which is welcomed as it would help to soften the appearance of the front of the site and retain the leafy suburban character of the area), as well as a number of smaller trees and shrubs across the entirety of the site (with further details of this planting to be secured via condition). Given that some of the proposed works would take place within the Root Protection Area (RPAs) of Category A trees and in close proximity to trees which are the subject of a TPO, tree protection measures and restricted activity zones have been proposed. Subject to the imposition of suitably worded conditions, including a requirement for that the proposed development accords with the recommendations contained within the submitted Arboricultural Report the Council's Arboricultural officer has no objections to the proposed development and the proposal would comply with policy DM28 of the CLP.

- 8.42 In respect of landscaping, whilst large portions of the site will features soft landscaping in the form of new trees, planting and lawns, with full details of said soft landscaping to be conditioned, hard landscaping in the form of setts and slabs is also proposed to the front of the site, as well as along the side and to the rear of the site. The proposed indicative landscaping scheme for the site is considered to be acceptable and incorporates an appropriate balance between hard and soft landscaping at the front of the site to ensure that the site is not dominated by hard landscaping features. Further details of the proposed landscaping (including samples where appropriate) alongside details of maintenance measures and any external lighting and boundary treatments proposed will be secured via condition.
- 8.43 An ecology report, incorporating a bat survey, has been submitted in support of the application to identify what habitats are present on site and look for any evidence of, or potential for, protected/notable species. This report concluded that whilst the site contained common/widespread habitat types, including the presence of a common pipistrelle (bat) day roost, subject to the imposition of the necessary conditions to ensure that the necessary licenses are obtained to ensure protected species are suitably protected, the proposed development would not represent a conservation concern from an ecology perspective. Furthermore in order to ensure that the proposed development does not have an adverse impact upon the biodiversity value of the site and instead results in a biodiversity net gain for the site (in accordance with policy G6 of the NLP and policy DM27 of the CLP) a series of mitigation and enhancement measures, including the provision of bat boxes, sparrow nest boxes and wildlife rich planting have been recommended. Conditions requiring further details of the proposed ecological enhancements as well as a wildlife sensitive lighting design scheme in accordance with the recommendations of the submitted ecology report are recommended.
- 8.44 CLP policy SP6.2 requires new development to minimise carbon dioxide emissions, including requiring new dwellings in major development proposals to be zero carbon. As a minimum a 35% reduction in regulated carbon emissions over the 2013 Building Regulations is required on site, with any remaining CO2 emissions to be offset through a financial contribution. CLP policy SP6.3 requires all new developments to achieve a high standard of sustainable design and construction. An energy statement accompanies the application and demonstrates how the proposals would achieve at least a 35% reduction in regulated carbon emissions. The building fabric would use

good levels of insulation, low air permeability, high efficiency heating systems and advanced heating controls, along with the use of solar PV panels in order to achieve this. Given that said solar PV panels are not indicated on the proposed plans (albeit there is a sufficiently sized flat portion of roof which would allow them to discreetly sited) details of said panels would be required by condition to ensure that they both achieve the anticipated emissions savings whilst also not having any adverse impact upon the final appearance of the proposed building. The remaining regulated CO2 emissions shortfall (in order to achieve the equivalent of zero carbon) would be secured through the S.106 agreement by way of a carbon offset payment of £25,937.

Flood Risk and Sustainable Drainage

- 8.45 The applicant has submitted a Flood Risk Assessment which also includes details of proposed SUDS measures. The site is located in Flood Zone 1 and according to the Environment Agency has a very low probability of fluvial flooding. Furthermore the site also sits in a location which is at a very low risk of surface water flooding. In order to mitigate against any possible increase in surface water flooding within the local area SUDS measures utilising infiltration systems with soakaway units and permeable paving will be incorporated in accordance with policy DM25 of the CLP with such measures being secured via a pre-commencement condition.

Other Matters

- 8.46 The development will be liable for a Community Infrastructure Levy (CIL) payment. CIL payments are pooled from developments and contribute to delivering infrastructure to support the development of the Borough, such as local schools.
- 8.47 The proposal was considered by the Metropolitan Police Service's Designing out Crime Officer who raised no objections. In order to ensure a safe, inclusive and accessible development where crime and disorder and the fear of crime do not undermine the quality of life, Secured by Design accreditation is recommended to be secured by a planning conditions.
- 8.48 CLP policy DM14 requires the inclusion of public art, which is to be secured by a planning condition.
- 8.49 The site is in residential use and the land is unlikely to be contaminated. A stage 1 contamination report and intrusive investigation is however recommended by condition, along with remedial works in the event that contamination is found to be present during the construction phase, to ensure a safe environment for future residents.
- 8.50 The site is in an Air Quality Management Area (AQMA), although it is not on a main road or near particularly polluting uses. A contribution of £1,700 towards air quality improvements to mitigate against non-road transport emissions will be secured via a S.106 agreement.
- 8.51 A health impact assessment screening was submitted which identified that the proposal would improve housing quality, with suitable access to health, social and retail facilities, open space and would be environmentally sustainable.

Conclusion

8.52 All other relevant policies and considerations, including equalities, have been taken into account. Planning permission should be granted subject to conditions and a legal agreement for the reasons set out above. The details of the decision are set in the RECOMMENDATION section of this report.

Appendix 1: Planning Policies and Guidance

The following lists set out the most relevant policies and guidance, although they are not exhaustive and the provisions of the whole Development Plan apply (in addition to further material considerations).

CLP

The Croydon Local Plan was adopted in February 2018 and the most relevant policies to this application are as follows:

- SP2 Homes
- DM1 Housing Choice for Sustainable Communities
- SP4 Urban Design and Local Character
- DM10 Design and Character
- DM13 Refuse and Recycling
- DM14 Public Art
- DM16 Promoting Healthy Communities
- SP6 Environment and Climate Change
- DM23 Development and Construction
- DM24 Land Contamination
- DM25 Sustainable Drainage Systems and Reducing Flood Risk
- SP7 Green Grid
- DM27 Protecting and Enhancing our Biodiversity
- DM28 Trees
- SP8 Transport and Communication
- DM29 Promoting Sustainable Travel and Reducing Congestion
- DM30 Car and Cycle Parking in New Development
- DM42 Purley

The Suburban Design Guide was adopted in April 2019 as a supplementary planning document to the CLP and is of relevance.

LP

The London Plan was adopted in March 2016 and the most relevant policies to this application are as follows:

- Policy 2.18 Green Infrastructure
- Policy 3.2 Improving Health and Addressing Health Inequalities
- Policy 3.3 Increasing Housing Supply
- Policy 3.4 Optimising Housing Potential
- Policy 3.5 Quality and Design of Housing Developments
- Policy 3.6 Children and Young People's Play and Informal Recreation Facilities
- Policy 3.8 Housing Choice
- Policy 3.9 Mixed and Balanced Communities
- Policy 3.10 Definition of Affordable Housing
- Policy 3.11 Affordable Housing Targets
- Policy 3.12 Negotiating Affordable Housing on Individual Private Residential and Mixed Use Schemes
- Policy 3.13 Affordable Housing Thresholds
- Policy 5.1 Climate Changes Mitigation

- Policy 5.2 Minimising Carbon Dioxide Emissions
- Policy 5.3 Sustainable Design and Construction
- Policy 5.7 Renewable Energy
- Policy 5.8 Innovative Energy Technologies
- Policy 5.9 Overheating and Cooling
- Policy 5.10 Urban Greening
- Policy 5.11 Green Roofs and Development Site Environs
- Policy 5.12 Flood Risk Management
- Policy 5.13 Sustainable Drainage
- Policy 5.14 Water Quality and Wastewater Infrastructure
- Policy 5.15 Water Use and Supplies
- Policy 5.17 Waste Capacity
- Policy 5.18 Construction, Excavation and Demolition Waste
- Policy 6.1 Strategic Approach
- Policy 6.3 Assessing Effects of Development on Transport Capacity
- Policy 6.5 Funding Crossrail and Other Strategically Important Transport Infrastructure
- Policy 6.9 Cycling
- Policy 6.10 Walking
- Policy 6.13 Parking
- Policy 7.1 Lifetime Neighbourhoods
- Policy 7.2 An Inclusive Environment
- Policy 7.3 Designing Out Crime
- Policy 7.4 Local Character
- Policy 7.5 Public Realm
- Policy 7.6 Architecture
- Policy 7.13 Safety, Security and Resilience to Emergency
- Policy 7.14 Improving Air Quality
- Policy 7.19 Biodiversity and Access to Nature
- Policy 7.21 Trees and Woodlands

The Housing SPG was adopted in March 2016 and the Play and Informal Recreation SPG was adopted in September 2012, both as supplementary planning guidance to the LP and are of relevance.

NLP

The New London Plan has been subject to public consultation and an examination in public (EiP). Whilst the NLP is yet to be formally adopted, it is close to adoption and the most relevant policies to this application are as follows:

- Policy GG1 Building Strong and Inclusive Communities
- Policy GG2 Making the Best Use of Land
- Policy GG3 Creating a Healthy City
- Policy GG4 Delivering the Homes Londoners Need
- Policy D1 London's Form, Character and Capacity for Growth
- Policy D2 Infrastructure Requirements for Sustainable Densities
- Policy D3 Optimising Site Capacity Through the Design-Led Approach
- Policy D4 Delivering Good Design
- Policy D5 Inclusive Design
- Policy D6 Housing Quality and Standards

- Policy D7 Accessible Housing
- Policy D8 Public Realm
- Policy D11 Safety, Security and Resilience to Emergency
- Policy D12 Fire Safety
- Policy H1 Increasing Housing Supply
- Policy H2 Small Sites
- Policy H4 Delivering Affordable Housing
- Policy H5 Threshold Approach to Applications
- Policy H6 Affordable Housing Tenure
- Policy H10 Housing Size Mix
- Policy S4 Play and Informal Recreation
- Policy G1 Green Infrastructure
- Policy G5 Urban Greening
- Policy G6 Biodiversity and Access to Nature
- Policy G7 Trees and Woodlands
- Policy SI 1 Improving Air Quality
- Policy SI 2 Minimising Greenhouse Gas Emissions
- Policy SI 3 Energy Infrastructure
- Policy SI 4 Managing Heat Risk
- Policy SI 5 Water Infrastructure
- Policy SI 7 Reducing Waste and Supporting the Circular Economy
- Policy SI 12 Flood Risk Management
- Policy SI 13 Sustainable Drainage
- Policy T1 Strategic Approach to Transport
- Policy T2 Healthy Streets
- Policy T3 Transport Capacity, Connectivity and Safeguarding
- Policy T4 Assessing and Mitigating Transport Impacts
- Policy T5 Cycling
- Policy T6 Car Parking
- Policy T6.1 Residential Parking
- Policy T7 Deliveries, Servicing and Construction
- Policy T9 Funding Transport Infrastructure Through Planning