

**1.0 APPLICATION DETAILS**

Ref: 19/05539/FUL  
 Location: 80 Croham Road South Croydon CR2 7HA  
 Ward: South Croydon  
 Description: Construction of a two-storey building with habitable roof space to accommodate 6 flats to the front and three terraced, two-storey, dwellinghouses to the rear of the site; with associated vehicle parking, cycle and bin provision; following the demolition of existing dwellinghouse.  
 Drawing Nos: J003349-DD-01; 02; 03; 04; 05; 06; 07C; 08F; 09E; 10E; 11C; 12C; 13D; 14E; 15A; 16A; 17C; 18B; 19B; 20E; 21G; 22; 23A; 24C; 25B; 26A; 27A; 28; 29; 30; 31  
 Agent: Emily Hall, WS Planning & Architecture  
 Applicant: Mrs Shahnaz Raja  
 Case Officer: Yvette Ralston

	<b>1 bed</b>	<b>2 bed</b>	<b>3 bed</b>	<b>4 bed+</b>	<b>TOTAL</b>
<b>Existing</b>	0	0	0	1 x 5b	1
<b>Proposed</b>	3 (1b2p)	5 (2b4p)	1 (3b5p)	0	9

*All units are proposed for private sale*

<b>Number of car parking spaces</b>	<b>Number of cycle parking spaces</b>
6	18

1.1 This application is being reported to Planning Committee in accordance with the following committee consideration criteria:

- Objections above the threshold in the Committee Consideration Criteria

**2.0 RECOMMENDATION**

2.1 That the Planning Committee resolve to GRANT planning permission subject to the completion of a legal agreement to secure the following:

- A financial contribution of £13,500 for sustainable transport improvements and enhancements.
- Removal of parking permits in the CPZ for new residents

2.2 That the Director of Planning and Strategic Transport has delegated authority to negotiate the legal agreement indicated above.

2.3 That the Director of Planning and Strategic Transport has delegated authority to issue the planning permission and impose conditions and informatives to secure the following matters:

## CONDITIONS

1. Commencement time limit of 3 years
2. Development to be carried out in accordance with the approved drawings and reports

### Pre-commencement conditions

3. Submission of Construction Management Plan and Construction Logistics Plan
4. Materials / details to be submitted
5. Protective fencing for trees at the rear of the garden and details of services installation in relation to RPAs

### Pre-Occupation Conditions

6. Submission of details of refuse and recycling store including space for bulky waste, and details of cycle store including provision of 2 x visitor cycle spaces
7. Submission of details of EVCPs
8. Submission of details of child play, communal amenity space, boundary treatments between private and shared amenity space and screening for rear bin store (details in accordance with plans) and a management plan for the hard and soft landscaping
9. Submission of details of solar panels

### Compliance Conditions

10. Implementation of car parking as shown on plans with no boundary treatments above 0.6m in the sightlines
11. Development in accordance with accessible homes requirements; 1 unit to be M4(3), 4 units M4(2) and 4 upper floor flats M4(1)
12. Obscure glazing on flank elevation windows at first floor and above
13. In accordance with Tree Protection Plan and Arboricultural Impact Assessment
14. In accordance with SUDS details
15. Compliance with energy and water efficiency requirements
16. Any other planning condition(s) considered necessary by the Director of Planning and Strategic Transport

## INFORMATIVES

1. Granted subject to a Section 106 Agreement
2. Community Infrastructure Levy
3. Code of practice for Construction Sites
4. Highways informative in relation to s278 and s38 works required
5. Compliance with Building/Fire Regulations
6. Construction Logistics Informative (in relation to condition 3)
7. Refuse and cycle storage Informative (in relation to condition 6)
8. 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 2 storey detached dwelling and garage
- Erection of a replacement 3 storey building comprising 6 flats plus 3 x 2-storey houses to the rear
- A new access route from Croham Road to the houses at the rear including the relocation of the vehicular crossover (1.5m to the west)
- 6 parking spaces – 3 on the front forecourt for the flats and 3 at the rear for the houses - and 18 cycle parking spaces
- Private amenity space, play space and hard and soft landscaping

3.2 During the assessment of the application amended plans have been received with the following minor amendments:

- Amendments to the proposed materials and additional details provided for balustrades, window details and cycle store details



## Site and Surroundings

- 3.3 The site is a rectangular shaped plot located on the south side of Croham Road comprising a 2 storey detached house with 5 bedrooms, a single storey garage and a large rear garden. The property on the site is a traditional suburban style property in white render and brick with front projecting bays and a pitched roof. There is a large front forecourt which is almost fully tarmacked used for car parking, a front boundary wall and trees. The site slopes gradually downwards from the pavement to the property and is then relatively flat to the end of the garden.
- 3.4 The area is suburban and residential in character, comprising properties of varying styles and materials. Examples of backland style development and flatted schemes are found in the area.
- 3.5 The site itself is not subject to any land use designations. There is a local heritage area on the opposite side of Croham Road. There are no TPO trees on the site but there is an area TPO on number 78 to the west (TPO 9, 1997). The site has a PTAL of 2 which is poor and Croham Road is a classified road. The site is at high risk of surface water flooding.



*Aerial view of the site*

## Planning History

- 3.6 Site history is set out below.

Reference	Description	Decision	Date
18/02157/FUL	Demolition of the existing building. Erection of a three storey building with accommodation in the roofspace (totalling four stories) comprising of 7x two bedroom and 2x one bedroom flats. Provision of associated parking, landscaping, refuse and cycle stores.	Withdrawn	18.01.2019

3.7 A pre-app for was submitted before the current application (different architect/agent)

Reference	Description
19/00251/PRE	Proposed 9 Flats - 6x 2bed and 3x 1bed flats. Demolish existing 5 bed detached house and garage.

#### 4.0 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The principle of the intensified residential development is acceptable given the residential character of the surrounding area
- The proposal includes a mix of different types and sizes of homes and a decent quality of accommodation and amenity space for residents.
- The design and appearance of the development is of a high quality, and would not harm the character of the surrounding area.
- The living conditions of adjoining occupiers would be protected from undue harm.
- The level of parking and impact upon highway safety and efficiency would be acceptable.

#### 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 The application was publicised by 26 letters of notification to neighbouring properties.

6.2 The number of representations received in response to the initial notification and publicity of the application is set out below. A request for referral to committee was received from Cllr Gatland however this was received after the referral deadline so is treated as an objection but is detailed separately below.

6.3 No of individual responses: 20; Objecting: 20; Supporting: 0

6.4 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.

<b>Objection</b>	<b>Officer comment</b>
<b><i>Character and design</i></b>	
The roofline is too high; building is taller than neighbouring properties and others on the street; overbearing; inconsistent with scale of surrounding buildings	Addressed in paragraphs 8.5-8.17 of this report
Fails to integrate into the neighbourhood in terms of appearance and flats are not in keeping with the area	
Overdevelopment of the site; a total of 9 units / 15 bedrooms in comparison to the existing 1 x 5-bed house	
Do not support balconies	
<b><i>Transport and highways</i></b>	
3 parking spaces for the flats is inadequate – will lead to on-street parking in adjacent streets which are already busy and dangerous to pedestrians	Addressed in paragraphs 8.41-8.48 of this report
More residents will lead to congestion on the main road and public transport delays	
The entrance next to the bus stop would be dangerous	
The sightlines in the report ignore the obstruction of the bus shelter immediately to the west.	
It would be difficult to park a large vehicle at the rear	
The access road is too narrow for emergency vehicles to access the rear of the site	
Cumulative impacts from recent developments nearby on transport and parking need to be taken into account	
<b><i>Impacts on neighbouring amenity</i></b>	
Impacts on privacy due to overlooking from balconies and windows – for	Addressed in paragraphs 8.26-8.32 of this report

residents on Croham Road, Broadeves Close and Croham Manor Road	
Impacts on 80 Croham Road: extends beyond the rear building so the building would loom over the garden; side facing windows looking over the house and garden (windows must be obscured); rear balconies overlooking the garden	
<b>Trees and environmental impacts</b>	
Loss of greenery	Addressed in paragraphs 8.33-8.40 of this report
There is a climate emergency so green spaces must not be destroyed	
Loss of trees and impacts on roots of TPO trees	
<b>Quality of accommodation</b>	
Cycle storage for the 3 houses requires residents to bring bikes through the house	Noted
Bin storage will be too small	Addressed in paragraphs 8.51-8.53 of this report
Lack of shared amenity space	Addressed in paragraph 8.24 of this report
Play space does not have a secure boundary and could be used a public space	This is unlikely given its location in the centre of the site and not visible from the public highway.
<b>Other</b>	
Insufficient number of 3-bed units	Addressed in paragraphs 8.3-8.4 of this report

6.5 The Croham Valley Residents Association objected to the application, raising the following concerns:

- Overdevelopment: 2 buildings comprising 6 flats and 3 houses with a total accommodation size of 637sqm is much larger than the existing 5 bed house.
- Unacceptable loss of trees which provide screening
- Overbearing due to its bulk, mass and design and will harm the appearance of the surrounding area
- Roof ridge line is unacceptably higher than neighbouring properties and there are balconies
- 3 parking spaces for 6 flats is inadequate
- Concern about how emergency vehicles will access the houses at the back
- Lack of shared amenity space for the flats

6.6 Cllr Maria Gatland objected to the application, raising the following concerns:

- Overdevelopment of the site
- Loss of trees and nature habitats
- The design does not reflect the character of the area or enhance the streetscene
- 3 parking spaces for the flats is not sufficient in this area of parking stress

## **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 New London Plan (2021), the Croydon Local Plan (2018) and the South London Waste Plan (2012).
- 7.2 Government Guidance is contained in the National Planning Policy Framework (NPPF) (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:

### London Plan (2021):

- D3 Optimising site capacity through the design-led approach
- D4 Delivering good design
- D5 Inclusive design
- D6 Housing quality and standards
- D7 Accessible housing
- H1 Increasing housing supply
- H2 Small sites
- H10 Housing size mix
- S4 Play and informal recreation
- G5 Urban Greening
- G6 Biodiversity and access to nature
- G7 Trees and woodlands
- SI1 Improving air quality
- SI2 Minimising greenhouse gas emissions
- SI3 Energy infrastructure
- SI12 Flood risk management
- SI13 Sustainable drainage
- T4 Assessing and mitigating transport impacts
- T5 cycling
- T6 car parking
- T6.1 Residential parking
- T7 Deliveries, servicing and construction

### Croydon Local Plan (2018):

- SP2 Homes
- DM1 Housing choice for sustainable communities
- SP4 Urban Design and Local Character
- DM10 Design and character
- DM13 Refuse and recycling
- SP6 Environment and Climate Change
- DM23 Development and construction
- DM25 Sustainable drainage systems and reducing floor risk
- DM27 Protecting and Enhancing our 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

- Croydon Suburban Design Guide SPD (2019)
- Section 106 Planning Obligations in Croydon and their Relationship to the Community Infrastructure Levy (2019)
- London Housing SPG (Mayor of London, 2016)
- Accessible London: Achieving an Inclusive Environment SPG (Mayor of London, 2014)
- Play and Informal Recreation SPG (Mayor of London, 2012)
- Character and Context SPG (Mayor of London, 2014)
- Sustainable Design and Construction SPG (Mayor of London, 2014)

## **8.0 MATERIAL PLANNING CONSIDERATIONS**

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

- Principle of development
- Design of the proposal and the impact on the character of the area
- Quality of accommodation
- Impact on neighbouring residential amenity
- Impacts on trees
- Landscaping
- Impacts on ecology and biodiversity
- Access, parking and highways impacts
- Waste / Recycling Facilities
- Sustainability and Flood Risk

### **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 SP2.1 of the Croydon Local Plan (2018) applies a presumption in favour of development of new homes and Policy SP2.2 states that the Council will seek to deliver 32,890 homes between 2016 and 2036, with 10,060 of said homes being delivered across the borough

on windfall sites. London Plan policy D3 encourages incremental densification to achieve a change in densities in the most appropriate way and policy H3 seeks to significantly increase the contribution of small sites to meeting London's housing needs. 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.

- 8.2 Policy DM1.2 seeks to prevent the net loss of three bedroom units and the loss of small family units that have a floor area of less than 130sqm. The existing property has 5 bedrooms and measures 171sqm. There is 1 x 3-bed family unit proposed which replaces a 3b+ property.
- 8.3 Policies SP2.7 and DM1.1 set a strategic target for 30% of all new homes over the plan period to have 3 or more bedrooms in order to meet the borough's need for family sized units and ensure that a choice of homes is available in the borough. In order to meet this strategic target, requirements for proportions of family sized accommodation based on PTAL are applied to major applications, and the general 30% target for 3-beds is normally applied on smaller scale suburban intensification schemes. In this case, there is only 1 x 3-bed unit proposed, which would not comply with the strategic target. However a good mix of different styles of homes are provided and the terraced homes at the rear of the site (1 x 3-bed and 2 x 2-beds) with private gardens would lend themselves to occupation by small families. This is considered to be acceptable on balance.

#### **Design and impact on the character of the area**

- 8.4 The existing building is a 2 storey detached property in white render and brick with a brown clay pitched roof. It does not hold any significant architectural merit and there is no in principle objection to its demolition.
- 8.5 Policies SP4.1 and DM10.1 of the Local Plan state 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. Proposals should seek to achieve a minimum height of 3 storeys, should respect the development pattern, layout and siting; the scale, height, massing, and density; and the appearance, existing materials and built and natural features of the surrounding area.
- 8.6 The site is located opposite the Campden & Spencer Road Local Heritage Area which contains a number of Locally Listed buildings including several well-preserved Victorian villas dating from before 1890 such as numbers 49-51 Croham Road, directly opposite the site. Impacts on the setting of the Local Heritage Area and locally listed buildings have been considered in the assessment of the scheme. The buildings are considered to be designed in an appropriately sensitive manner to preserve the special character of the area.
- 8.7 The proposed front flatted building is 3 storeys in height which complies with the Suburban Design Guide SPD which indicates 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. The height is appropriate and the building is considered to sit well within the

streetscene. It does not breach the 45 degree lines from neighbouring properties in elevation which indicates that the height and massing is appropriate.



Figure 2.10c: Where surrounding buildings are predominantly detached dwellings of two (2) or more storeys, new developments may be three (3) storeys with an additional floor contained within the roof space or set back from the building envelope below.

*Extract from Suburban Design Guide SPD*



*Proposed massing / street elevation*

- 8.8 The 3 x terrace houses at the rear are 2 storeys in height and are appropriately subservient to the front flatted block. They are of a similar height and scale to the neighbouring properties to the west (3 Broadeves Close) and south (5 & 7 Broadeves Close) and do not raise any concerns in terms of having an overbearing visual impact on neighbouring properties.
- 8.9 The proposed development on the site follows a similar pattern to the adjacent development at Broadeaves Close in terms of footprint and access arrangements. The front block extends approximately 2.8m beyond the rear of 1 Broadeves Close and respects the 45 degree sight line from the rear window of 1 Broadeves Close. The houses at the rear have a similar footprint to 3 Broadeves Close to the west but are aligned between 2.5 – 4m further forward to allow space for rear gardens behind. The positioning of the houses respects the 45 degree line from the back window of number 3 Broadeves Close (which is orientated with its front door facing south).
- 8.10 The front block extends approximately 1.75m beyond the rear of the conservatory / 8m beyond the main building of number 82 Croham Road to the east. The massing also respects the 45 degree site lines from the closest rear facing windows of this property. The proposed mass of the front block is acceptable and the front building line is appropriately stepped to correspond with neighbouring properties on either side.

8.11 The separation distance between the front block and the rear houses is 14m. At the front, the separation distance from the flank elevation of the block and the site boundary to the west is 1m, and the distance between the buildings is 4m. On the east side, the gap is larger to accommodate the access road; 3.5m to the site boundary and 6m to the adjacent building. The gaps are the same as the existing arrangement and maintain adequate separation between properties when viewed from the street scene. At the rear, there is a 1m gap on either side between the flank walls of the houses and the site boundary. The existing 1.8m high (on the east) or 2m high (on the west) close board fences would be retained. Overall, the positioning of the buildings is acceptable.



*Proposed site plan showing positioning and footprint of buildings*

8.12 In terms of the wider site layout, the proposal is to retain the existing vehicle crossover and introduce a new access road on the east side (adjacent to number 82) to provide access to the houses at the back. The front forecourt slopes down gradually by approximately 1.5m from the footway to the front of the property. No changes are proposed to the land levels apart from minor amendments at the front of the building to ensure level access. There is level access through the building at ground floor level to the rear amenity space. There are 3 car parking spaces proposed at the front forecourt for the 6 flats along with cycle storage and an area of landscaping. The soft landscaping at the front is not extensive but is an enhancement on the existing. A delineated pedestrian path leads to the main entrance and to the rear in a welcoming, legible building approach. The front boundary treatment is a low wall as per the existing and some hedging, with 2

large trees to be retained. The trees would screen the parking and bike store on the forecourt.

- 8.13 There are 3 car parking spaces proposed at the rear (in the centre of the site) for the 3 houses. An area of shared amenity space and play space is also proposed in the centre of the site. Refuse storage is mainly integrated within the front building envelope and there is also a small refuse store adjacent to the amenity space for use by the rear houses.
- 8.14 The proposed design approach is a contemporary reinterpretation. The roof form of the flatted block is a contemporary style pitched roof with no overhanging eaves featuring larger and smaller front facing gables and a sunken flat roof section in the centre with solar panels. The brick detailing involves the use of textured bricks around the edge of the roof and continuing around the building to reference the traditional bargeboards and quoins locally. This is considered to be successful and brick details have been amended as part of the assessment of the application to provide a more subtle contrast. There is also a protruding brick course between the upper floor windows of the front block. The proposed balconies at the rear and are appropriately integrated into the building and a metal upright balustrade is proposed which is acceptable. Materials specifications have been provided as well as details of the window reveals, bricks, guttering, etc and these are broadly acceptable at this stage but final details will be required by condition. The proposed balustrades for the inset balconies at the rear are metal upright balustrades which are acceptable. The proposed materiality responds well to materials found in the vicinity.
- 8.15 The design approach for the houses at the rear is simple with well-proportioned front gable roofs, some brick detailing between the windows and appropriate insets to windows and doors to add depth to the facades. This simple approach is considered to be suitable for a backland style development.
- 8.16 Overall, the proposed design is considered to be a high quality contemporary reinterpretation approach whilst maintaining an overall traditional building form, which responds well to the character of the area. The height, massing, layout and design approach to the site is compliant with policies SP4.1 and DM10 and is considered to represent a general enhancement to the streetscene.

### **Quality of Accommodation**

- 8.17 London Plan policy D6 states that housing developments should be of a high quality and provide adequately sized rooms with comfortable and functional layouts. It sets out minimum Gross Internal Area (GIA) standards for new residential developments. All proposed units exceed the minimum space standards and internal layouts have been well thought out with adequate storage space. In the flatted block, all proposed units are dual or triple aspect and will receive good levels of light and outlook. Side facing bathroom windows are appropriately obscure glazed.
- 8.18 The layout of the 3 houses at the rear is acceptable. Each has a ground floor kitchen, WC and living room with doors opening out to the private gardens, with 2 or 3 bedrooms upstairs and bathrooms. The layouts suggest that they would

provide adequate accommodation for small families. The 14m separation distance between the flatted block and the rear houses does not raise inter-overlooking issues.

- 8.19 London Plan policy D7 states that 10% of new build housing should meet Building Regulation requirement M4(3) 'Wheelchair User Dwellings'. 1 wheelchair user dwelling is provided (unit 1, the 1b2p unit on the ground floor of the flatted block) which has a floorspace of 58.5sqm and complies with this requirement. The remaining 90% of units should meet Building Regulation requirement M4(2) 'Accessible and Adaptable Dwellings' which requires step free access to all units and the facilities of the site. Unit 2 on the ground floor of the flatted block (2b4p) complies with M4(2) requirements. However no lift is proposed internally which means that the 4 upper floor flats do not have step free access and are not M4(2) compliant. Policy D7 states that homes that are not on the ground floor on minor developments can comply with the M4(1) standard, which does not require step-free access, where provision of step-free access would be unfeasible. In this instance, officers are satisfied that providing a lift for four flats would not be viable. There is level access to the front of the flatted block and through the building to the amenity space.
- 8.20 There is level access to the houses at the rear via the pedestrian walkway from the front of the site. Internally within the houses the occupiers would need to install chairlifts if step free access is required, which could be accommodated. Step-free access to the amenity space / play space and bins is provided for all occupiers of both the flatted block and the rear houses. Therefore, the development can provide 1 M4(3) unit and four M4(2) units with only the upper floor flats being M4(1) standard.
- 8.21 Policy DM10.4 of the Local Plan requires provision of high quality private amenity space at a minimum of 5sqm per 1-2 person unit and an extra 1sqm per extra occupant thereafter. In the flatted block the ground floor units have rear patios which face towards the communal areas (pedestrian path or shared garden); hedges are proposed to separate these spaces but full details of the boundary treatment will be required by condition. The upper floor flats have rear facing inset balconies which all comply with space requirements. The houses each have private rear gardens of over 20sqm in area, which is positive.
- 8.22 In addition, communal amenity space and play space is provided in accordance with policies DM10.4 and DM10.5. These spaces are combined in the centre of the site, with the majority (around 23sqm) being occupied by play space. This quantum of play space is sufficient but more detail is required with regards to how the communal amenity and play space will be laid out and landscaped in order to cater for different users. It will also be necessary to provide good screening between the small bin store adjacent and the communal amenity space. It is acknowledged that the amenity space is relatively small, however all units have private amenity space so it is considered acceptable.
- 8.23 In summary, the proposal would provide good quality accommodation for future occupiers internally and externally in accordance with Local Plan Policies SP2 and DM10 and the London Plan policies D6 and D7.

## Impacts on Neighbouring Residential Amenity

- 8.24 Policy DM10.6 of the Local Plan states that the Council will ensure proposals protect the amenity of occupiers of adjoining buildings and will not result in direct overlooking into their habitable rooms or private outdoor space and not result in significant loss of existing sunlight or daylight levels. The nearest residential properties are number 82 Croham Road to the east and number 1 and 3 Broadeves close to the west. To the rear (south) is number 5 Broadeves Close. The assessment of impacts on neighbouring amenity takes into account the fact that the majority of the existing trees on the site are proposed for removal (discussed below), including those along the boundaries.
- 8.25 As mentioned, the front block complies with 45 degree lines in plan and elevation so would not be overbearing towards either neighbouring property, nor have a detrimental impact on their outlook. The flats are orientated with their main outlook towards the front and back, with all balconies inset, to avoid overlooking concerns to neighbouring properties.



*Proposed site plan showing relationship with neighbouring properties (45 degree lines marked in red)*

- 8.26 82 Croham Road is sited 5.9m to the east of the proposed building. It has 4 small ground floor side facing windows from the living room which currently look to the 1.5m high fence separating the property from number 80. These are secondary windows with the main living room windows facing the street and the adjoining

conservatory at the rear. Number 82 does not have any first floor windows facing number 80. The proposed front flatted block includes 2 east facing windows at ground floor, of which one would be obscured (as it is a bathroom window) and the other (bedroom window) would look towards the fence so would not raise privacy concerns. There are also 2 east facing windows at first floor, both of which are bathroom windows which would both be obscured. No overlooking concerns to the property, conservatory or garden of number 82 are raised.

- 8.27 1 Broadeves Close is sited approximately 4m to the west of the proposed building. It has 2 ground floor doors (with small glass windows) facing the site behind a 1.8m high fence. The proposed flatted block includes one west facing ground floor window which does not need to be obscured as it would face the fence, 2 first floor west facing windows, both of which would be obscured as they are secondary windows, and 1 second floor west facing window which would also be obscured as it is a secondary window. No overlooking concerns to the property or garden of 1 Broadeves Close are raised.
- 8.28 At the rear, the 3 x 2-storey terraced houses are positioned and laid out internally to avoid any overlooking impacts. The house on the west (house 3) is sited 2m from the side of number 3 Broadeves Close. 3 Broadeves Close is orientated with its front entrance to the south, so the 45 degree line from ground floor the rear window has been shown and it has been demonstrated that this is not breached by the proposed house on the west. 3 Broadeves Close does not have any flank windows facing the proposed houses. House 3 has 1 ground floor window and 1 first floor side window proposed, both of which would be obscured. The easternmost house (house 1) in the proposed terrace similarly would have 1 ground and 1 first floor window facing east. The first floor window is to a non-habitable space (stairs) and would face towards the end of number 82's garden so does not raise any amenity concerns.
- 8.29 The house to the rear, 5 Broadeves Close, has 1 first floor window facing the site. It is currently screened by a row of tall trees. These would be retained, as well as the 1.8m high fence. Ground floor windows do not raise overlooking concerns given the fence. At the first floor, each house has a Juliette balcony and a small windows facing south. The positioning of house 1 means that it could have the potential to overlook the first 10m of the rear garden of 5 Broadeves Close (which would be contrary to policy DM10.4d) however this would be from a distance of 15m and would be largely screened by the tall Poplar trees and so therefore does not constitute direct overlooking prohibited by policy. No amenity concerns are raised in terms of overlooking or privacy impacts to the house or garden of the property.
- 8.30 The assessment demonstrates that there are no detrimental amenity impacts on neighbouring properties resulting from the proposed development, and this is considered to be the case despite the proposed removal of the majority of the trees on the site (discussed below), including those along the boundaries. The buildings may be more visible to neighbouring properties than the current arrangement, but this does not equate to detrimental impacts on neighbouring amenity. The proposal complies with policy DM10.6.

## Trees

- 8.31 Policy DM10.8 and DM28 seek to retain existing trees and vegetation. There are currently a number of trees on and adjacent to the site; 45 in total which are of an adequate size to be assessed within the arboricultural assessment, and 10 of these are just outside the site boundary. Trees comprise 34 x Category C trees, 9 x Category B trees and 2 x Category U trees. The trees are spread across the site, with a few in the front garden, many along the east, west and south boundaries of the site, and a group in the rear garden.
- 8.32 There is an area TPO (TPO 9, 1997) on the former site of number 78 Croham Road (now Broadeves Close) to the west. The trees on the western and southern boundaries (outside the site) are therefore protected by TPOs. None of the adjoining TPO trees are to be impacted by the proposed development.
- 8.33 The proposal would involve the removal of a total of 33 trees, of which 2 are category B Cyprus trees in the centre of the rear garden (T17 and T18), 29 are category C trees within the site and 2 are Category U trees.
- 8.34 There are 12 trees to be retained, of which all but 2 are located just outside the site boundary within neighbouring properties. This means that all trees within the grounds of the site, apart from 2 Ash trees in the front garden, are to be removed. The removal of the 2 Cyprus trees T17 and T18 (13-14m in height) is regrettable but they are not protected and their removal is necessary to facilitate development. The remainder of the trees proposed for removal are of a poorer quality and smaller in size and their removal is accepted. It is acknowledged that this is a high number of tree removals and that there will be a fairly substantial reduction in tree coverage on the site, however those proposed for removal are generally of a low quality and their removal will be mitigated by a high quality landscaping scheme including 10 replacement trees. This approach has been agreed by appropriate Officers within the Council and, on balance, the removal of trees does not outweigh the benefits brought by the proposed development of the site.
- 8.35 The best quality trees are a group of large Poplar trees of around 20m in height at the rear (southern boundary) of the site, within the grounds of 5 Broadeves Close (T28-32), and are all to be retained. These trees are protected by the area TPO of 78 Croham Road. There is no development proposed within their RPAs as this is where the rear gardens of the proposed terrace of houses are located. 1 TPO tree on the western boundary is also to be retained, and its RPA will not be impacted as it is in the location where native boundary hedging is to be located. The other trees to be retained are 4 on the eastern boundary and 2 at the front of the site.
- 8.36 The proposed new access road on the eastern side of the site would conflict with the RPA of T14 (category C) within 82 Croham Road by 6sqm (14.6% of total RPA). This is a fairly significant root incursion which would be mitigated by ensuring that the road is of a no-dig design in this area, which is achievable as outlined in the Arboricultural Method statement. The road would also lead to very minor root incursions to tree T12 (Category C) by 0.4sqm or 3.6% of its RPA. The report states that there is adequate space on site to ensure that service runs

are located outside of the RPAs of retained trees, however in order for this to be demonstrated the Council will require details of services installation by condition to ensure that this is outside of the RPAs. Protective fencing and ground protection will be used around all retained trees as appropriate to safeguard the trees. This approach has been agreed with appropriate officers and will be required as a pre-commencement condition to ensure retained trees are protected from the outset.

### **Landscaping**

- 8.37 Local Plan policy 10.8 requires proposals to incorporate hard and soft landscaping. A landscaping scheme and Landscape Statement has been submitted showing details of hard and soft landscaping, amenity planting and boundary treatments. At the front, a low brick wall would be reinstated with a hedge. Native hedging would be provided on the west side and the around the rear gardens to encourage biodiversity, and clipped hedging would be provided on the east side alongside the access road. 4 new trees are proposed in the front garden and 6 in the rear garden. Permeable paving would be used on the access route and parking areas, with lawn and some wildflower plug planting in the amenity spaces. Clipped hedging is proposed as the boundary treatment between private and shared amenity spaces. Species, size and density of proposed planting has also been provided.
- 8.38 Details of the play space has not been provided at this stage. A condition will be attached to require this detail, along with a management and maintenance plan for the landscaping and play space.

### **Access, Parking and Highway Safety**

- 8.39 The site has a Public Transport Accessibility Level (PTAL) of 2 which indicates poor access to public transport. The site is within a CPZ.

#### Access arrangements

- 8.40 Currently the vehicle crossover is on the eastern site boundary adjacent to the fence with number 82. The proposal is to move the crossover 1.5m to the west, away from the site boundary. This enables the required pedestrian sightlines to be achieved on either side.
- 8.41 There is a bus stop outside the site and the crossover would be moved 1.5m closer to the bus stop, so that it would be around 10m away. The minor shift in the position of the crossover would not have a material impact on the operation of the bus stop. As a worst case scenario, exiting vehicles may have to wait momentarily whilst a bus is at the bus stop. The impact of the presence of the bus shelter on visibility for vehicles leaving the site would be acceptable as the bus shelter is narrow and does not have side panels or a bench so does not provide a significant obstruction to the view of oncoming cars. The shift in the location of the crossover would require the street sign outside the site to be relocated and this would be agreed through a S278 agreement. The width of the crossover would remain the same at 3.1m with 0.5m ramps on either side. The appropriate vehicular sightlines of 2.4m by 43m to the east and west are

achieved. A condition will be attached to ensure that no planting or obstructions above 0.6m in height are located within the sightline areas. No concerns are raised with regards to highway safety.

- 8.42 A new access road and pedestrian pathway would be constructed to provide access to the front and rear parts of the site. The access road includes appropriate passing space for cars and also a speed bump. The speed bump is to ensure vehicles move slowly to avoid any conflict between those parked at the front and the back of the site. As raised in representations, the access road is not wide enough for a fire appliance to access the rear of the site, however a sprinkler system could be installed at the rear which would be acceptable.

#### Car parking

- 8.43 In areas of PTAL 2 in outer London, London Plan policy T6 requires up to 0.75 parking spaces per dwelling for 1-2 bed units and up to 1 space per 3+ bed dwelling. This would equate to a maximum of 7 car parking spaces comprising 2.5 for the houses at the rear and 4.5 for the flats at the front. The proposal includes a total of 6 car parking spaces for the 9 units; 1 each for the houses at the rear and 3 for the 6 flats in the block at the front. This provision would therefore provide just short of the London plan maximum requirements. It is often not desirable to deliver the maximum amount of parking on site as this can, amongst other things, promote unsustainable travel patterns. There is a bus stop outside the site serving the 64 and 433 buses which provide access to East and West Croydon, Thornton Heath and New Addington. South Croydon train station is also located 650m to the west. Given the relatively good accessibility of the site to local public transport options, the provision of 6 car parking spaces for the 9 flats does not raise any concerns.
- 8.44 The site is within a CPZ so parking permits would be removed from future residents. However it is on the edge of the CPZ so residents would be able to park in surrounding roads and it therefore necessary to undertake some analysis of parking stress in the vicinity (outside of the CPZ), taking into account cumulative impacts from nearby developments. The Councils starting point for suburban sites such as this is normally for 1:1 parking. As such, in order to justify a worst case shortfall of 3 car parking spaces a parking survey has been undertaken. The survey assessed on-street parking availability overnight within 200m walking distance of the site on 13th November 2019. The survey included spaces on Sycamore Close where parking bays are private and therefore should not be included. When this road is removed, and parking spaces within Spencer Road and Campden Road within the CPZ are discounted (as residents will not be able to park here) the parking stress would be 55% (22 cars parked, 40 spaces). Should the worst case scenario of three overspill spaces from the development occur, this would increase the parking stress in these uncontrolled spaces to 62.5% (25 or 40 occupied). This is the parking stress resulting from the development and is considered to be acceptable.
- 8.45 When cumulative impacts from nearby developments are also factored in, there is potential for an increase in parking stress. 7 nearby development sites have been assessed. The majority provide 1:1 car parking and those that do not have justified this approach with their own parking beat surveys demonstrating parking

availability in the vicinity. These sites have been assessed as their survey areas overlap with the application site's and as they have less than 1:1 parking, however they are more than 200m away from the available parking spaces on Normanton Road, Hollycroft Close and Croham Manor Road and so are considered unlikely to result in a cumulative impact. Therefore the worst reasonable case is that the scheme results in a parking stress of 62.5% (25 of 40 occupied) of parking spaces outside of the Controlled Parking Zone, on suitable roads. This is an acceptable level of parking stress and it should be noted that the development itself provides 6 spaces (just 1 short of the maximum London Plan allowance) and parking permits for the CPZ will be removed from new residents through a S106 legal agreement, which is likely to deter residents from owning cars and contributing to parking stress in the vicinity. Furthermore, as mentioned, the public transport links in the area are considered to be relatively good, which may further encourage residents to use sustainable methods of transport, which would be supported.

- 8.46 Swept paths for the parking spaces are provided, demonstrating that the spaces are accessible. 1 disabled car parking space is proposed at the front of the site, closest to the entrance to the flatted block, and 1 of the spaces at the rear has been identified as potential second disabled bay if required. 2 electric vehicle charging points are provided (1 at the front and 1 at the back) and the remainder would be passive spaces.
- 8.47 A contribution of £13,500 will be secured via S106 agreement to contribute towards sustainable transport initiatives including on street car clubs with electric vehicle charging points (ECVPs) as well as general expansion of the EVCP network in the area in line with Local Plan policies SP8.12 and SP8.13. The funding would go towards traffic orders at around £2500, signing, lining of car club bay, EVCP provision including electrics and set up costs for the car club. Funding will also be used for extension and improvements to walking and cycling routes in the area to support and encourage sustainable methods of transport.
- 8.48 The car parking arrangements comply with Local Plan policy DM30 and London Plan policy T6.

#### Cycle parking

- 8.49 Policy DM30 and London Plan policy T5 and Table 10.2 would require provision of a total of 12.5 cycle parking spaces; 7.5 for the flats at the front and 5 for the houses at the rear. The proposal involves a total of 18 cycle parking spaces; 12 for the flats at the front and 2 each for the houses at the back. This is an oversupply of cycle parking space, however in the interests of promoting sustainable transport this is not a concern.
- 8.50 The cycle store for the flats is located on the front forecourt in a wooden store containing Sheffield stands including a space for an adapted bike. The cycle store is in a convenient and accessible location. The houses each have smaller wooden containers in their rear garden with space for 2 bikes each. In line with London Plan policy T5 it will also be necessary to provide 2 visitor cycle parking spaces; this is not shown on the site plan but there is sufficient space for a Sheffield stand at the front of the site. This will be required by condition.

## **Waste / Recycling Facilities**

- 8.51 Policy DM13 requires the design of refuse and recycling facilities to be treated as an integral element of the overall design. The bin store is located within the building envelope, on the eastern elevation and accessed externally. Timber doors would open onto the pedestrian pathway so would not conflict with vehicles. The bin store is located within 20m of the roadside, enabling collection by Council operatives.
- 8.52 A second bin store is proposed at the rear of the site for use by the 3 houses. As previously mentioned, this bin store will need to be well screened as it is adjacent to the shared amenity space. A refuse management Strategy has been submitted outlining that it will be the responsibility of the Site Managers to move the refuse containers to the designated collection point by 6am on the scheduled collection day, and then to return the containers to their storage areas after emptying.
- 8.53 Proposed waste receptacles include a total waste provision of 1560L and recycling provision of 1320L and food waste is not indicated. The proposed quantum of bins is not compliant at this stage with the Council's New Build and Conversion waste management document, however there is more than enough space for the necessary number of bins for the site. Final details will be required by condition. A storage space for bulky waste, as required by policy DM13, is not shown on the plan but there is sufficient space on the site and this will be required as part of the condition.

## **Flood Risk and Energy Efficiency**

### Flood risk

- 8.54 The site is located within an area at high risk of surface water flooding and within a critical drainage area. There is also a moderate risk of groundwater flooding. The proposed development has been designed with appropriate flood risk mitigation measures incorporated. Ground floor levels would be raised to 56.6mAOD, which is 0.6m above external ground levels in the area of the surface water flow route; water resistance measures would be included in the development to ensure protection against the 1 in 100 year flood event, including the use of flood doors, raising electrical sockets and non-return valves for foul and surface water discharge pipes.
- 8.55 In order to mitigate impacts of surface water flooding, 2 geocellular crates would be provided; 1 at the front to provide attenuation for 15.2 cubic metres of surface water (which is in excess of the requirement for 14.7m<sup>3</sup>) and 1 at the back, beneath the proposed play area, to drain overland surface water from the flood flow route. Potential floodwaters from the rear attenuation tank would be released to the public sewer at a restricted rate of 2l/s. Drainage gulleys would be provided along the eastern side of each building to drain to the rear geocellular crate. Rainwater butts would also be provided for rainwater attenuation, and permeable paving on hard surfaces. The site is not appropriate for water infiltration into the ground due to the chalk soil.

8.56 Details provided within the Flood Risk Assessment and the SUDS Strategy are acceptable in line with Local Plan policy DM25 and the London Plan Sustainable Drainage Hierarchy (policy SI13).

#### Energy efficiency

8.57 The plans show that solar panels are provided on the roof of the flatted block and the houses. This is welcomed in line with policy SP6 and details will be required by condition. A standard condition will also be attached requiring the proposed development to both achieve the national technical standard for energy efficiency in new homes (2015) which requires a minimum of 19% CO2 reduction beyond the Building Regulations Part L (2013), and meet a minimum water efficiency standard of 110 litres/person/day as set out in Building Regulations Part G. This is to ensure that the proposed development will be constructed to high standards of sustainable design in accordance with Local Plan policy SP6.

#### **Conclusion**

8.58 The provision of 6 flats and 3 houses in this location is acceptable in principle. The proposed mix of different types of accommodation and the layout of the site is supported. The design and massing of each building is appropriate as it provides a good quality of accommodation and avoids amenity impacts on neighbouring occupiers. The loss of trees is substantial but the best quality trees around the site boundary are to be retained and protected which is welcomed and a well-considered landscape plan has been provided. The approach to flood risk mitigation has also been thoroughly considered. The level of on-site car parking and the access arrangements are acceptable.

8.59 All material considerations have been taken into account, including responses to the public consultation. Taking into account the consistency of the scheme with the Development Plan and weighing this against all other material planning considerations, the proposal is considered to be acceptable in planning policy terms.

#### Other matters

8.60 The development would be liable for a charge under the Community Infrastructure Levy (CIL).

8.61 All other planning considerations including equalities have been taken into account.