

**1.0 APPLICATION DETAILS**

**Ref:** 21/04028/FUL  
**Location:** 25 The Grove | Coulsdon | CR5 2BH  
**Ward:** Coulsdon Town  
**Description:** Erection of two-storey building with double-storey roof and basement level to provide eight (8) self-contained flats (following demolition of existing two-storey dwellinghouse), Associated amenity, cycle storage, hard/soft landscaped, vehicle parking and waste storage spaces, and Alterations.  
**Drawings:** 021 Rev. C; 022 Rev. C; 2010/62/AIA; 2010/62/TCP; 2020/5510/001 Rev. P9; 2020/5510/005 Rev. P1; D012.PL.001; D012.PL.002 Rev. C; D012.PL.003; D012.PL.004 Rev. D; D012.PL.005 Rev. C; D012.PL.006 Rev. C; D012.PL.007 Rev. C; D012.PL.008 Rev. C; D012.PL.009 Rev. C; D012.PL.010 Rev. C; D012.PL.011 Rev. C; D012.PL.012 Rev. B; D012.PL.013 Rev. B; D012.PL.014 Rev. C; D012.PL.015 Rev. C; D012.PL.016 Rev. C; D012.PL.017; D012.PL.018 Rev. B; D012.PL.019 Rev. C; and D012.PL.020.  
**Statements:** Design & Access Statement Rev. C -- Prepared by NewPlace; Energy Statement (ref. 8649) -- Prepared by Base Energy Services Ltd. (09.07.2021); External Daylight Study -- Prepared by Base Energy Services Ltd. (09.07.2021); Flood Risk and Surface Water Assessment (Rev.2) -- Prepared by Base Energy Services Ltd. (16.05.2021); Planning Statement (ref. NPA-TGC-25-HTA-P-Planning Statement) -- Prepared by HTA Design LLP (July 2021); and Revision B of Transport Statement (ref. 5510/TS03) -- Prepared by GRP Consulting Engineers Ltd.  
**Agent:** Arjun Singh  
**Applicant:** New Place Associates  
**Case Officer:** Demetri Prevatt

	Type of Dwelling Units					Totals
	One Bedroom	Two Bedroom	Three Bedroom	Four Bedroom	Five or More Bedrooms	
Existing	0	0	0	0	1	1
Proposed	2	4	2	0	0	8

Number of Vehicle Parking Spaces	Number of Cycle Parking Spaces
Six (6)	Seventeen (17)

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 £12,000 for sustainable transport improvements and enhancements;
- Prevention of future occupants of the approved dwellings from obtaining parking permits within future Controlled Parking Zones in the vicinity of the application site

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

#### Standard

1. Three-year time limit for commencement.
2. Requirement for development to be carried out in accordance with the approved drawings and reports.

#### Pre-Commencement of Development Conditions

3. Submission and approval of a Construction Management Plan and Construction Logistics Plan.
4. Submission and approval of a Construction Environmental Management Plan for Biodiversity.
5. Submission and approval of details of a Tree Method Statement and Tree Protection Plan.

#### Pre-Commencement of Above Ground Work Conditions

6. Submission and approval of details of a Sustainable Urban Drainage System.
7. Submission of detailed drawings of the retaining walls.

#### Pre-Commencement of Visible Superstructure Conditions

8. Submission and approval of details of the materials specifications including facing materials, joinery and openings.
9. Submission and approval of details of Enhanced Sound Insulation.
10. Submission and approval of details of the rooftop photovoltaic panel installation.

#### Pre-Occupation Conditions

11. Submission and approval of details of on Electric Vehicle Charging Points.
12. Submission and approval of details of a Waste Management Plan.
13. Submission and approval of further details on the Landscaping Strategy including a Biodiversity Enhancement Strategy, landscaping management plan, and details on: boundary treatment design (incl. visibility splays); arrangement

- of communal amenity space; play space arrangement equipment, and materials/plantings for hard/soft landscaping.
14. Submission and approval of details on lighting.

#### Compliance Conditions

15. Use restriction to dwellinghouses (Use Class C3).
16. Implementation of cycle storage as shown on plans prior to occupation.
17. Provision and maintenance of off-street vehicle parking spaces.
18. Provision of accessible and adaptable dwellings.
19. Compliance with dwelling emissions rate and water efficiency standard.
20. Installation and maintenance of anti-vibration measures.
21. Provision and maintenance of obscured-glazed and partially non-opening windows in the side elevations.
22. Provision of ultra-low NOx boilers.
23. Any other planning condition(s) considered necessary by the Director of Planning and Strategic Transport

#### INFORMATIVES

1. Community Infrastructure Levy
2. Code of practice for Construction Sites
3. Highways informative in relation to s278 and s38 works required
4. Compliance with Building/Fire Regulations
5. Construction Logistics Informative
6. Refuse and cycle storage Informative
7. Any other informative(s) considered necessary by the Director of Planning and Strategic Transport

### **3.0 PROPOSAL AND LOCATION DETAILS**



## Proposal

3.1 The application seeks Planning Permission for the redevelopment of the site involving the:

- Demolition of the existing two-storey detached dwellinghouse (Use Class C3);
- Erection of a two-storey detached building with a non-habitable basement level and bi-level habitable loft to form eight (8) self-contained dwelling units (Use Class C3);
- Provision of 6 car parking spaces in the basement;
- Provision of associated amenity, cycle storage, hard/soft landscaped, vehicle parking, and waste storage spaces; and
- Various supporting alterations.

3.2 According to the proposed plans listed above, the building proposed would rise above its 246.0sqm ground level floor plate to eaves located 7.2m above ground level and a 12.5m high main ridgeline. It would have a design inspired by the traditional architecture of neighbouring buildings and be finished in either red or white brickwork in both horizontally and vertically stacked patterns. The roof tiles would be red and the door/window openings a mixture of timber composite and metal framing. In addition to varied brickwork patterns, rafter tails on the front elevation would contribute to visual relief.

3.3 The proposed building would have provide a single one-bedroom, two-person flat and two (2) two-bedroom, three-person flats on both the ground floor and first floor levels. A three-bedroom, five-person unit would be located on the lower loft level while a larger three-bedroom, six-person bi-level unit would be split across the lower and upper loft levels. The gross internal area (GIA) of each flat is detailed in Table 3.0.

Dwelling	Floorspace Provided	Floorspace Required	Number of Bedrooms	Type of Bedrooms	Occupancy
Flat G1	61.8sqm	61.0sqm	2	1 Double & 1 Single	3
Flat G2	54.0sqm	50.0sqm	1	1 Double	2
Flat G3	61.1sqm	61.0sqm	2	1 Double & 1 Single	3
Flat F4	61.9sqm	61.0sqm	2	1 Double & 1 Single	3
Flat F5	50.4sqm	50.0sqm	1	1 Double	2
Flat F6	60.7sqm	61.0sqm	2	1 Double & 1 Single	3
Flat S7	87.5sqm	86.0sqm	3	2 Doubles & 1 Single	5
Flat S8	116.0sqm	102.0sqm	3	3 Doubles	6

**Table 3.0:** Details of dwellings to be provided.

3.4 Entry to the building would be provided via an above ground front entrance located at the ground floor level close to a set of steps up from street level, as well as, a lift in the basement level accessible via a pedestrian ramp from street level. Both the pedestrian ramp and adjoining vehicle ramp would provide access

to a communal bin store room, seventeen (17) space secured cycle storage room, and six (6) off-street vehicle parking spaces located within the basement.

- 3.5 The private amenity space provided by the balcony or patio from which every unit would benefit would be supplemented by 226.8sqm of amenity space to be provided in the re-landscaped rear garden. 21.9sqm of this space would be designed to function as children's play space.
- 3.6 According to the Arboricultural Impact Assessment Plan (dwg. 2010/62/AIA) and Proposed Landscaping Plan (dwg. D012.PL.020), the proposal would involve the felling of a single tree (T8) in the front garden of the host property, as well as, a single group of trees (G2) and three individual (3) trees (T3, T4 and T5) in the rear garden. This loss of a single group of trees and four (4) individual trees would be off-set by the planting of six (6) feature trees in the front garden and twenty-one (21) trees in the rear garden.
- 3.7 The proposed alterations would also involve a reconfiguration of the existing vehicle crossover to the front of the property including restoration of part of the existing footpath.

### Site and Surroundings



- 3.8 The application site is a rectangular 924.6sqm residential property located in Coulsdon on the northwest side of The Grove. It contains a two-storey detached dwellinghouse with accommodation in the roofspace. It has reddish/brown roof tiles and a white render finish that is reflective of the residential character and traditional design of the various types of detached houses that line the side street. Nevertheless, the existing dwellinghouse is at the upper end of the spectrum in terms of the scale of the local housing stock.
- 3.9 As with the neighbouring houses on the northern side of the public highway, the existing building is at a higher elevation than street level but benefits from a detached garage built into the slope of the otherwise vegetated and sloping front garden. It benefits from a one-storey side extension to its original southwest-facing flank wall that forms a shed, as well as, a one and a half-storey side extension along its original northeast-facing flank wall that provides habitable space. Habitable roofspace has been created in the dual-pitched main roof with side gables through the erection of a dormer window on the rear roofslope and installation of a window into each side gable.
- 3.10 The land levels of the host property continue the slope upward beyond the paved patio to the rear of the existing dwellinghouse. Immediately beyond the patio is a sloping section of the rear garden that is heavily landscaped with steps passing through shrubs and small trees. The aforementioned paths lead to a grassy section beyond that slopes gently up toward the rear boundary of the site.
- 3.11 Although the application site is within walking distance of Coulsdon Town national rail station, it has a 'poor' PTAL Rating of 2 according to the Transport for London's (TfL) online planning tool. However, a manual PTAL assessment completed by the Applicant's Transport consultant and detailed in the submitted Transport Statement concludes that the application site has a 'moderate PTAL Rating of 3. Vehicular access is relatively convenient due to the aforementioned detached front garage and lack of local parking restrictions, such as a Controlled Parking Zone, along the immediate stretch of The Grove.
- 3.12 In regard to other relevant planning constraints, the local area is deemed to be in a Critical Drainage Area and suffers from a Local Park Deficiency. However, the host property is neither located within a Conservation Area, subject to a relevant Article 4 Direction, nor the site of a Listed Building.

### **Planning History**

- 3.13 98/02173/P -- Erection of single storey side extension with accommodation in roof space. -- Conditionally Granted on 05.11.1998.
- 3.14 97/01980/P -- Erection of single storey side extension. -- Conditionally Granted on 16.10.1997.
- 3.15 83/02636/P -- Erection of double garage in front garden. -- Conditionally Granted on 20.12.1983.

#### 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 and the need for housing nationally and locally.
- The proposal includes a mix of different sized units and provides a good quality of accommodation and amenity space for residents.
- The design and appearance of the development is of a high quality and is sympathetic to the character of the surrounding area.
- The proposed landscaping scheme and planting of additional trees would result in an enhancement to the streetscene.
- The living conditions of adjoining occupiers would be protected from undue harm.
- The level of parking and the impact on highway safety and efficiency would be acceptable.

#### 5.0 CONSULTATIONS

##### Highways Services

- 5.1 No objection in regards to Drainage, Highways Boundary, Highways Works and On-Street Parking. Various conditions suggested, relating to these matters to ensure the impacts of the proposed development are properly and sufficiently mitigated.

##### Thames Water

- 5.2 No objection to the proposal in regards to both foul water, surface water and waste water management. Informatives have been suggested.

#### 6.0 LOCAL REPRESENTATION

- 6.1 Ten (10) neighbouring properties were notified of the application and invited to comment. Seventy-three (73) individuals/parties including MP Chris Philp submitted seventy-four (74) representations that were all in objection to the proposal. The concerns raised in these objections are summarised in Table 6.0, which also contains the Case Officer's response to the objections.

Objection	Officer's Response
<b>Principle of Development</b>	
The local area is saturated with flats. Furthermore, the London Plan (2021) reduced its housing target prior to its adoption.	Acknowledged and addressed in paragraphs 8.2 and 8.3. Furthermore, a reduction in housing targets does not constitute their elimination and the housing targets in the London Plan are higher than those set out in the Croydon Local Plan 2018
The local area is not designated an area of focused intensification.	It is acknowledged that the application site does not fall within an area of focused intensification. However, the

	proposed development is not seeking to benefit from the provisions of the Croydon Local Plan's focused intensification policy (DM10.11).
<b>Density</b>	
The increase in the number of dwellings constitutes an overdevelopment that would strain soft and hard infrastructure.	Acknowledged and addressed in paragraphs 8.7 through 8.9.
The cumulative impacts of allowing intensification proposals on the application and nearby properties would be excessive and unsustainable.	The carrying capacity of the application site and surrounding area is acknowledged and addressed in paragraphs 8.7 through 8.9. Similar assessments for intensification proposals on neighbouring sites would be completed prior to Planning Permission being granted. As such, cumulative impacts within the entire area would be taken into consideration.
<b>Impact on Character &amp; Appearance</b>	
As there are currently no blocks of flats on The Grove, the proposal's introduction of flats would be out of keeping with the character of the single-family area.	Acknowledged and addressed in paragraphs 8.14 and 8.15.
The appearance of the development (e.g. contemporary-style, materials, height and openings) would be incongruous with the appearances of neighbouring buildings that define the character of the street scene.	Acknowledged and addressed in paragraphs 8.14 through 8.18.
The excessive bulk, footprint, height, massing and size of the proposed building would be out of keeping with the quiet, leafy street and semi-rural street/area.	Acknowledged and addressed in paragraphs 8.19 through 8.23.
Balconies and roof terraces are out of keeping with the character of the rear garden setting.	Acknowledged and addressed in paragraph 8.18.
<b>Impact on Local Amenity</b>	
The increase in the number of units and inhabitants would result in an increase in activity and noise that would constitute an undue nuisance.	Acknowledged and addressed in paragraph 8.30.
The design and scale of the proposed building would appear overbearing and result in undue losses of light, outlook, and privacy.	Acknowledged and addressed in paragraphs 8.26 through 8.29.



The construction of the proposed development would generate dust, noise and pollution.	The ability to construct permitted development is granted by right through planning legislation. However, building works to complete such development must take place in accordance with the Council's requirements for construction that have been designed to fairly manage noise and disturbance during building works. In addition, a condition has been proposed requiring a Construction Management Plan and Construction Logistics Plan to manage these impacts.
<b>Quality of Accommodation</b>	
The quality of and outlook would be substandard in one (1) or more of the proposed flats.	Acknowledged and addressed in paragraph 8.32.
The level of daylight and sunlight would be substandard in one (1) or more of the proposed flats.	Acknowledged and addressed in paragraph 8.32.
Living in flats can be detrimental to the mental health of occupants.	Acknowledged and addressed in paragraphs 8.31 through 8.33.
One (1) or more of the private amenity space would be undersized.	Acknowledged and addressed in paragraph 8.35.
The development may not be accessible.	Acknowledged and addressed in paragraph 8.33.
<b>Impact on Local Transport</b>	
The increase in the number of units and inhabitants would result in an unmanageable and unsustainable increase in traffic and on-street parking strain. Additionally, it would be detrimental to pedestrian/highway safety.	Acknowledged and addressed in paragraphs 8.42 through 8.51.
<b>Impact on Natural Environment</b>	
The loss of natural habitats, permeable surface area, trees and vegetation would be detrimental to nature.	Acknowledged and addressed in paragraphs 8.38 and 8.39.
<b>Waste Management Provisions</b>	
Inadequate and poorly designed.	Acknowledged and addressed in paragraph 8.55.
<b>Public Consultation</b>	
Notices of the development were not posted in lampposts.	Notification of the application was given in accordance with the adopted procedures of the Council. In this regard, the posting of Site Notices was not

	necessary or completed as all adjoining occupiers were notified by letter.
There was a lack of direct notification of neighbouring properties.	Notification of the application was given in accordance with the adopted procedures of the Council and in accordance with national procedures. The Council has fulfilled its statutory duty in this regard

**Table 6.0:** Issues material to the determination of the application raised in public objections.

## 7.0 RELEVANT PLANNING POLICIES AND GUIDANCE

7.1 This recommendation to grant planning permission has been taken having regard to the policies and proposals in the London Plan (2021) and Croydon Local Plan (2018), as well as, to all relevant material considerations:

### Town and Country Planning Act 1990 (As Amended)

#### National Planning Policy Framework (2021)

Section 4	Decision Making
Section 5	Delivering a Sufficient Supply of Homes
Section 8	Promoting Healthy and Safe Communities
Section 9	Promoting Sustainable Transport
Section 11	Making Effective Use of Land
Section 12	Achieving Well-Designed Places
Section 14	Meeting the Challenge of Climate Change, Flooding and Coastal Change
Section 15	Conserving and Enhancing the Natural Environment

#### London Plan (2021)

Policy GG2	Making the Best Use of Land
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 D8	Public Realm
Policy D11	Safety, Security and Resilience to Emergency
Policy D12	Fire Safety
Policy D14	Noise
Policy H1	Increasing Housing Supply
Policy H2	Small Sites
Policy G4	Open Space
Policy G5	Urban Greening
Policy G6	Biodiversity and Access to Nature
Policy G7	Trees and Woodlands
Policy SI1	Improving Air Quality

Policy SI2	Minimising Greenhouse Gas Emissions
Policy SI4	Managing Heat Risk
Policy SI7	Reducing Waste and Supporting the Circular Economy
Policy SI12	Flood Risk Management
Policy SI14	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 T7	Deliveries, Servicing and Construction
Policy DF1	Delivery of the Plan and Planning Obligations

#### Croydon Local Plan (2018)

Policy DM1	Housing Choice for Sustainable Communities
Policy DM10	Design and Character
Policy DM13	Refuse and Recycling
Policy DM16	Promoting Healthy Communities
Policy DM18	Heritage Assets and Conservation
Policy DM25	Sustainable Drainage Systems and Reducing Flood Risk
Policy DM27	Protecting and Enhancing Our Biodiversity
Policy DM28	Trees
Policy DM29	Promoting Sustainable Travel and Reducing Congestion
Policy DM37	Coulsdon
Policy SP2	Homes
Policy SP4	Urban Design and Local Character
Policy SP6	Environment and Climate Change
Policy SP7	Green Grid
Policy SP8	Transport and Communication

#### Other Relevant Policies & Guidance

Borough Character Appraisal (LBC - 2015)  
Housing SPG (GLA - 2015)  
Suburban Design Guide SPD (LBC - 2019)  
Technical Housing Standards - Nationally Described Space Standard (2015)  
Waste and Recycling in Planning Policy Document (LBC, 2015, As Amended)

## **8.0 MATERIAL PLANNING CONSIDERATIONS**

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

- Principle of Development;
- Density;
- Architectural and Environmental Design;
- Local Amenity;
- Quality of Accommodation;
- Amenity Space;
- Urban Greening
- Local Transport;
- Environmental Sustainability;
- Waste Management; and
- Fire Safety.

### **Principle of Development**

8.2 In order to create a housing market that works better for all Londoners, the London Plan (2021) states that the planning and development system must ensure that more homes are delivered (Policy GG4). 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. The London Plan (2021) also states that London Boroughs should proactively support well-designed new homes on small sites (below 0.25 hectares in size) through planning decisions in order to significantly increase the contribution of small sites to both meeting London's housing needs and diversify the sources, locations, type and mix of housing supply (Policy H2). 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.

8.3 In regard to "well-designed new homes", the London Plan (2021) and Croydon Local Plan (2018) note that development seeking to optimise local housing output is expected to have a high-quality design that addresses and respects the character of the local area; local need for family-sized housing; capacity of the local transport network; and the level of density the surrounding area is considered capable of supporting (London Plan - Policies D1, D2, D3 and GG2; Croydon Local Plan - Policy DM1, DM10, SP2 and SP4). The proposed development would be a relatively low-impact addition to and diversification of an existing development leading to the provision of additional homes in a part of the Borough that is conveniently located close to an existing and well-served rail

station. It is a good example of a sympathetically designed development that would increase the housing stock and options available to Londoners in an area where it is appropriate and could be handled.

- 8.4 According to the Croydon Local Plan (2018), there is an identified need for larger homes in the borough requiring the retention of existing three-bedroom dwelling units and the development of more (Paragraphs 4.20 and 4.21). Therefore, the Council will only permit the redevelopment of residential units where it does not result in the net loss of three-bedroom homes (as originally built) or the loss of homes smaller than 130.0sqm.
  
- 8.5 It is acknowledged that the proposed development would result in the loss of a family-sized home (i.e. three (3) or more bedrooms). However, the existing dwellinghouse is larger than 130.0sqm and the proposal would result in the net gain of a family-sized home. 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, the proposal includes 2 x 3 bed units, so the proportion of 3 bed units (25%) does not meet the strategic target. However, a good mix of different sized homes are provided and given that this is not a major application, it is accepted that it is not always possible to meet the 30% requirement. In addition, the proposal would result in an uplift of 3 bed units in comparison to the current 1 x family size unit on site. Therefore, it is considered that it would be unreasonable to warrant a refusal on this basis.
  
- 8.6 Subject to compliance with the relevant policies and objectives of the National Planning Policy Framework (2021), London Plan (2021), Croydon Local Plan (2018), Croydon’s Suburban Design Guide SPD (2019) (herein referred to as ‘SDG’) and all other relevant Supplementary Planning Guidance/ Documents, the proposal is considered to be in line with local and regional strategic objectives that seek to make the best use of land and optimise local housing potential.

Type of Unit		Quantum
One Bedroom	One-Bedroom, Two-Person	2
Two Bedroom	Two-Bedroom, Three-Person	4
Three-Bedroom (Family-Sized)	Three-Bedroom, Five-Person	1
	Three-Bedroom, Six-Person	1

**Table 8.0:** Breakdown of the proposed dwellings by unit type.

**Density**

- 8.7 The London Plan (2021) requires development to follow a design-led approach that optimises the capacity of sites to ensure that development is of the most appropriate form and land use for the development site, as well as, responds to

development sites' context and capacity for growth (Policy D3). In regard to the latter, the plan notes that the density of a development proposal should be linked to the provision of future planned levels of infrastructure rather than existing levels and be proportionate to the site's connectivity and accessibility by walking, cycling, and public transport to jobs and services (London Plan - Policy D2).

- 8.8 The proposed development would utilise five (5) levels to increase the density of the site but still present itself as a two-storey building from all elevations. Furthermore, it would increase the footprint of the property's main building without: adopting a shape that would be contrived or incongruous with the local built environment, or relying on excessive projections beyond the established building lines. Therefore, the proposal is considered to have adopted a considerate design-led approach that increases the density of the existing residential use on a spacious property through an acceptable built form.
- 8.9 In regard to general soft and hard infrastructure in the local area, it is noted that the proposed development would provide less than ten (10) new dwellings and is, therefore, considered to be a minor development. As such, the proposal does not meet the various thresholds of the London Plan (2021) that would require the scheme to provide pre-calculated physical or financial contributions to mitigate any significant impacts on soft and hard infrastructure in the local community. However, it would be subject to a charge under the Community Infrastructure Levy for local infrastructure. In contrast, the conveniently accessible location of the development site would lead to the provision of much needed additional housing in a part of the borough that is a practical location for any increases in soft and hard infrastructure that the Council will provide to meet its obligation to provide more housing.

### **Architectural and Environmental Design**

- 8.10 According to the National Planning Policy Framework (NPPF) (2021), the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve (Paragraph 126). Therefore, the NPPF (2021) requires planning policies and decisions to ensure developments are visually attractive as a result of good architecture, layout and appropriate and effective landscaping yet are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (e.g. increased densities) (Paragraph 130).
- 8.11 In accordance with NPPF (2021) policy on 'achieving well-designed places', Croydon's Local Plan (2018) requires development proposals to be of high quality and respect: the development pattern, layout and siting; scale, height, massing, and density; and appearance, existing materials and built/natural features of the surrounding area and Place of Croydon in which it is located (Policy DM10).
- 8.12 With regard to the local character of the application site and its surroundings, both Croydon's Borough Character Appraisal (2015) and Local Plan (2018) identify Coulsdon as a small suburban settlement surrounded by green areas of Green Belt (Character Appraisal - Page 26; Local Plan - Paragraph 11.70).

Furthermore, the Borough Character Appraisal (2015) notes that Coulsdon is relatively verdant in character with tree lined streets and its detached houses are mainly found on larger hillside properties with landscaped front and rear gardens (Pages 30 & 31).



**Image 8.1:** Existing (Left) and Proposed Block Plans.

### Typology and Siting

8.13 It is noted that although the proposed building would provide residential accommodation and supporting amenities (e.g. cycle and waste storage spaces) across five (5) internal levels, the building would present itself externally as a two-storey dwellinghouse with a sunken garage. Additionally, it would be built on the same site as the existing dwellinghouse. As a result, the property would continue to reflect the form and siting that is characteristic of detached dwellinghouse properties in the local area.

### Character and Materials

8.14 The SDG (2019) explicitly states that the built character of an area is not defined by the people who live there, but rather the physical characteristics of which it is composed (Paragraph 2.7.1). As such, character can change over time and it is possible for well-designed proposals to be integrated into an existing community and have a positive effect on that area (SDG - Paragraph 2.7.1).

8.15 In light of the SDG's (2019) identification of what does not define character, the fact that the proposed development would result in a single-family building being with a multi-family building is not negative mark against the proposal. Furthermore, it is noted that family neighbourhoods are not limited to areas comprised of only single-family houses as families can live within multi-dwelling

buildings. In this regard, the proposed development would provide two (2) family-sized dwellings that would help bring larger families to the local area.

- 8.16 In attempting to provide a well-designed proposal, the SDG (2019) advises that development does not need to replicate existing qualities and can evolve the character of an area by referencing and reinforcing existing architectural styles or introduces new well-designed architectural styles that add interest to the area including increased building sizes (Paragraph 2.7.2).
- 8.17 The design of the proposed two-storey building adopts the architectural-styling of a detached dwellinghouse original to the local area (e.g. dual pitched, double-fronted, brick buildings). However, it also adds a few subtle contemporary elements such as vertical brickwork, white bricks, and a mix of metal and timber composite framings. As such, it adopts a blend of two approaches to responding to character described in the SDG (2019); Contemporary Reinterpretation, and Sympathetic & Faithful. The result is a building that has a strong relationship with neighbouring buildings but makes a small contribution to the evolution of the character and appearance of the street scene through adding contemporary accents that complement the traditional appearance of the existing buildings. Nevertheless, this recommendation includes a condition requiring the submission and approval of further details on the facing materials to be used in the development of the proposed building.
- 8.18 The SDG (2019) states that balcony design is an integral part of a proposal and must be part of the initial design phase (Paragraph 2.26.1) rather than an amenity to be rejected outright. In this regard, the roof terraces proposed in the development would be a new feature in the immediate area but they have been carefully designed as part of the overall scheme to ensure their appearance and supporting screening is integrated into the design and appearance of the proposed two-storey building.

#### Height and Scale

- 8.19 According to Croydon's Local Plan (2018), development proposals should seek to achieve a height of three-storeys while respecting the height of existing buildings (Policy DM10.1). In this regard, the proposed development would provide residential accommodation and supporting amenities across five internal levels within a two-storey building. It is acknowledged that in order to accommodate four of its five levels above ground, the proposed building would rise 1.7m higher than the existing dwellinghouse. However, the proposed building benefits from a design that spreads the extra height across the ground floor, first floor and roof levels to ensure the building is only relatively larger than neighbouring two-storeys buildings rather than excessively so. Furthermore, the additional height allows the proposal to meet the Croydon Local Plan's intent of seeking three-storey buildings (i.e. sensitive intensification) without adding the 3.0m of height that would likely be needed to accommodate a third-storey.





**Image 8.2:** Existing (top) and Proposed (bottom) Street Scene.

### Form and Massing

8.20 When a development would result in a building projecting beyond a rear building line, the SDG (2019) states it should follow a 45-degree rule (See: Image 8.3) to avoid any detrimental impacts on adjoining amenity (Paragraph 2.11.1). However, the SDG also advises caution when dealing with the ‘stepping’ that could result from adhering the 45-degree rule and states that no stepping should be introduced where the stepping would overly complicate the development’s form (Paragraph 2.11.3).

8.21 As illustrated on the Proposed Ground Floor Plan (dwg. D012.PL.007 Rev. C) listed in the Approved Plans, the areas of the proposed building that would project beyond the rear building lines of the original dwellinghouse and existing neighbouring buildings would pass the 45-degree rule test. While the form of the building would not adopt a rigid ‘T’-shape, it would appear neither contrived nor illogical. It allows the development to blend into its surrounding and provide a logical evolution to the pattern of development of the local rear garden setting.

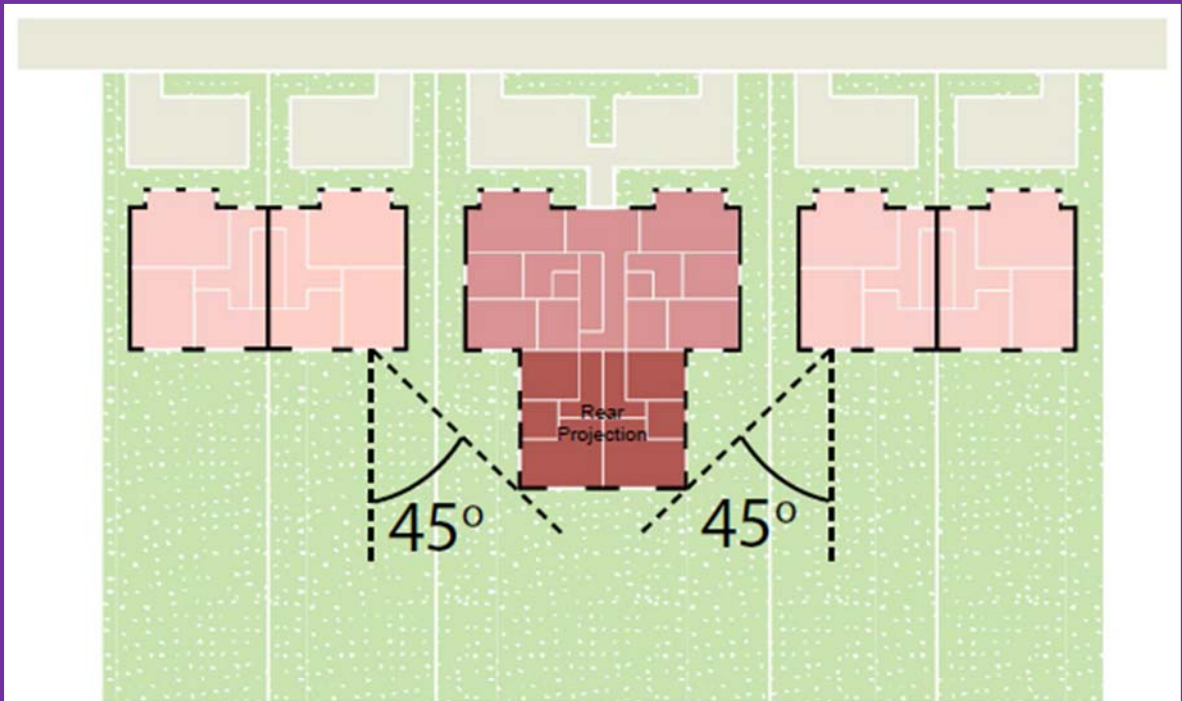


Figure 2.11b: Depth of projection no greater than 45 degrees as measured from the middle of the window of the closest ground floor habitable room on the rear wall of the main neighbouring property on both sides.

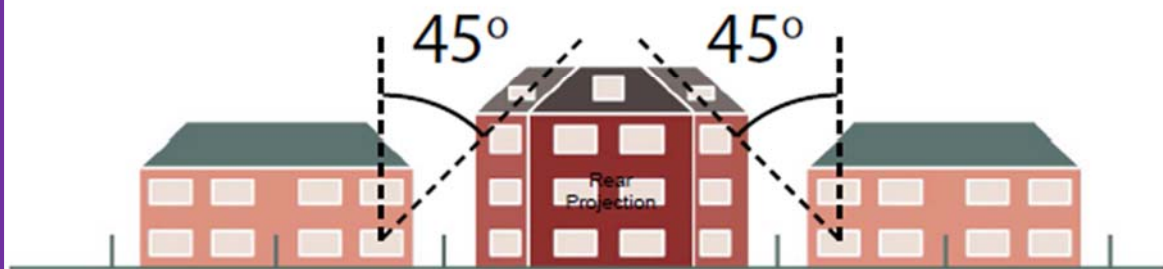


Figure 2.11c: Height of projection beyond the rear of neighbouring properties is no greater than 45 degrees as measured from the middle of the window of the closest ground floor habitable room on the rear wall of the main neighbouring property on both sides.

**Image 8.3:** 45-Degree Test Rule.



**Image 8.4:** 45-Degree Test on plan.

8.22 In regard to the width of redevelopment proposals such as the subject application, the SDG (2019) states that the width of a proposal should be determined by the appearance within the streetscene and proposed proportions and fenestration of the front elevation (Paragraph 2.17.2). Additionally, developments that seek to build closer to the boundary with neighbouring plots must demonstrate consideration to the impact on neighbouring amenity as well as the rhythm of development along the street (SDG - Paragraph 2.16.2).

8.23 It is noted that the proposed two-storey building would project beyond the side building lines of the original dwellinghouse and encroach upon the property's side boundaries. However, a notable buffer would remain between the flank walls of the proposed building and side boundaries ensuring through views and preventing an out of keeping 'terrace-effect'. Additionally, the balanced fenestration and use of a projecting gable-end on the front elevation of the proposed building would soften the impact of the building's larger massing. Lastly, the fact that the existing dwellinghouse has a massing that is relatively large means the proposed increase in width is neither drastic nor excessive.

### Landscaping

8.24 According the Croydon Local Plan (2018), development should seek to retain existing landscape features that contribute to the setting and local character of an area (Policy DM10). As noted above, tree-lined streets and front gardens are characteristic of the leafy suburban area that is Coulsdon. In this regard, it is noted that proposed development would not only retain the level of landscaping with the front garden of the property but add an additional area to the side of the existing sunken garage, as well as, feature trees.

8.25 Although the extensive urban greenery currently found in the rear garden of the existing property does not contribute to the street scene along The Grove, it is

characteristic of a verdant and leafy suburban area. While it is acknowledged that the proposed development would result in the felling of numerous trees and removal of large amount of shrubs and plants, it is also noted that the proposed landscaping plan would result in a net gain of trees and provision of a similar amount of soft landscaping with a larger portion that could be used by future occupants. Full details of landscaping can be controlled by the imposition of a planning condition.

### **Local Amenity**

- 8.26 The Croydon Local Plan (2018) states the Council will support development proposals that ensure they protect the amenity of the occupiers of adjoining buildings and do not result in: direct overlooking at close range or habitable rooms in main rear / private elevations; significant loss of existing sunlight/daylight levels of adjoining occupiers; and direct overlooking of private outdoor space (with the exception of communal open space) within 10.0m perpendicular to the rear elevation of a dwelling (Policy DM10).

#### Enclosure & Impact on Light

- 8.27 It is noted that the proposed two-storey building would be set away from the side boundaries with the adjoining properties of nos. 23 and 25A The Grove by 1.7m to 4.8m. While the proposed building would be taller than the existing dwelling house by 1.7m, the buffers between the building and adjoining properties would be sufficient to avoid any undue enclosure of the adjoining properties. The adequacy of the separation distances to be provided are evident in the findings of the External Daylight Study prepared by Base Energy Services Ltd. that concluded while a couple of windows of a neighbouring house (W5 and W9) would suffer significant losses of daylight and possibly sunlight, the habitable rooms of these neighbouring houses would not.

#### Impact on Outlook

- 8.28 As noted previously in this report (Images 8.4 and 8.5), the proposed building's projection beyond the rear building lines of the buildings at the adjoining properties to the side would not encroach beyond the 45-degree rule test described and illustrated in the SDG (2019). Therefore, it is noted that the proposed development would not give rise to any undue enclosure or losses of outlook from the neighbouring properties.

#### Impact on Overlooking

- 8.29 It is noted that the door and window openings proposed for the front and rear elevations of the proposed two-storey building would have no more of an impact on privacy at neighbouring properties than existing openings located on the same elevations of the existing dwellinghouse. While the balconies and side-facing window openings proposed to serve the flats to be provided at the first floor and lower loft levels could introduce new opportunities for overlooking, the use of obscure-glazing and louvered screening would ensure the privacy of neighbouring properties is maintained. Additionally, this recommendation

includes conditions that would ensure the subject windows would be obscure-glazed and partially non-opening and that the balconies would have screening.

### Noise & Activity

8.30 Although the proposed development would increase the intensity of the residential use of the site, the density of development would be in keeping with carrying capacity and scale of the large suburban property. Therefore, the level of activity, disturbance and noise generated by the redevelopment would be in keeping with the levels expected in an area that can accommodate moderate intensification. However, the recommendation includes numerous noise-related conditions that would ensure noise emissions from mechanical equipment associated with the development are acceptable.

### **Quality of Accommodation**

8.31 According to the Technical Housing Standards – Nationally Described Space Standard (2015), every dwelling unit proposed aside from Flat F6 would provide a sufficient amount of Gross Internal Area (GIA) (See: Table 3.0). However, the shortfall in the undersized unit would be marginal (just 0.3 sqm), and it benefits from a considerate design that makes good use of the internal living space to avoid creating cramped living conditions. Therefore, all dwelling units proposed are deemed capable of providing acceptable amounts of living space to future occupants due to the practicality, efficiency and effectiveness of their internal layouts.

Dwelling	Floorspace Provided	Floorspace Required	Number of Bedrooms	Type of Bedrooms	Occupancy
Flat G1	61.8sqm	61.0sqm	2	1 Double & 1 Single	3
Flat G2	54.0sqm	50.0sqm	1	1 Double	2
Flat G3	61.1sqm	61.0sqm	2	1 Double & 1 Single	3
Flat F4	61.9sqm	61.0sqm	2	1 Double & 1 Single	3
Flat F5	50.4sqm	50.0sqm	1	1 Double	2
Flat F6	60.7sqm	61.0sqm	2	1 Double & 1 Single	3
Flat S7	87.5sqm	86.0sqm	3	2 Doubles & 1 Single	5
Flat S8	116.0sqm	102.0sqm	3	4 Doubles	6

**Table 3.0:** Details of dwellings to be provided.

8.32 In addition to having practical and comfortable layouts, the proposed dwellings would be located far enough away from neighbouring buildings to benefit from pleasant outlooks and good levels of natural light. While some of the windows serving habitable rooms would have limited outlooks due to the use of obscured-glazing, all but one of these rooms would be served by other primary windows providing outlook and natural light. It is acknowledged that Bedroom 3 in Flat S8 would not benefit from a window opening providing an appreciable outlook. However, it is also noted that Flat S8 provides a substantial amount of living space that could be utilised by the future occupant(s) of Bedroom 3 to offset the bedroom's artificially constrained outlook.

8.33 In order to provide suitable housing and genuine choice for London’s diverse population (incl. disabled people, older people and families with young children), residential development must ensure that at least ten percent (10%) of dwellings are compliant with Building Regulation M4(3) and all remaining dwellings are compliant with Building Regulation M4(2) (London Plan - Policy D7). As the proposed development would provide one (1) dwelling (Flat G1) as a M4(3) compliant unit and the remaining as M4(2) compliant units, the proposal would be sufficiently accessible. Consequently, the proposal adheres to local and regional policies requiring the internal areas of housing developments to be of the highest quality.

### Amenity Space

8.34 According to local and regional policy, housing is expected to be of the highest quality both internally and externally (London Plan - Policy D6; Croydon Local Plan - Policy DM10). In regard to the latter, the noted policies require 5.0sqm of private outdoor space to be provide for one to two-person units with an extra 1.0sqm per every extra occupant thereafter. Furthermore, the London Plan (2021) expects these spaces to be practical in terms of their shape and utility so as to ensure the space offers good amenity (Policy D6).

8.35 As noted above, every dwelling unit would be provided with private amenity space in the form of a patio for ground floor units and a balcony for upper floor dwellings. In regard to quality, each of these amenity spaces would be considered genuine and fit-for-purpose. In contrast, three (3) of the proposed amenity spaces would not provide the amount of space required by local and regional policy. However, the short-falls are not considered to be significant and it is acknowledged that these minor short falls would be off-set by the expansive communal amenity space to be provided in the rear garden of the property. This 226.8sqm communal amenity space would provide 28.4sqm of high-quality open space per unit.

Dwelling	Area of Balcony/Patio	Area Required	Compliant
Flat G1	21.8sqm	6.0sqm	Yes
Flat G2	21.6sqm	6.0sqm	Yes
Flat G3	16.1sqm	6.0sqm	Yes
Flat F4	5.5sqm	6.0sqm	No
Flat F5	14.5sqm	5.0sqm	Yes
Flat F6	5.5sqm	6.0sqm	No
Flat S7	8.0sqm	8.0sqm	Yes
Flat S8	8.0sqm	9.0sqm	No

**Table 8.1:** Details of dwellings to be provided.

8.36 In addition to providing general outdoor amenity space, the Croydon Local Plan (2018) requires flatted development to provide a minimum of 10.0sqm per child of new play space (Policy DM 10.4). As such, the proposed development would need to provide at least 15.0sqm of play space. By proposing 21.9sqm of play space in the communal rear garden, the proposal exceeds the minimum requirement. In order to ensure the quality and suitability of the proposed play space, this recommendation includes a condition requiring the submission and approval of further details on the play space including the type of play equipment to be installed.

## **Urban Greening**

- 8.37 According to local and regional policy, the inclusions of urban greening measures (e.g. high-quality landscaping, green roofs and green walls) must be provided to increase the green cover in London (London Plan - Policy G5; Croydon Local Plan - SP7). Additionally, the Council seeks to protect and enhance the borough's woodlands, trees and hedgerows by requiring all development proposals to comply with the recommendations of BS5837 2012 (Trees in relation to design, demolition and construction) or equivalent and resists development that would result in the avoidable loss or the excessive pruning of preserved trees or retained trees (Croydon Local Plan -- Policy DM28).

### Landscaping & Biodiversity

- 8.38 As the inclusion of urban greening measures in new development will result in an increase in green cover, the London Plan (2021) states that such measures should be integral to planning the layout and design of new buildings and developments (Policy G5). Additionally, the both local and regional require development proposals to manage impacts on biodiversity and aim to secure net biodiversity gain, (London Plan - Policy G6; Croydon Local Plan - Policies DM27 and SP7).
- 8.39 It is acknowledged that the existing front and rear gardens provide a dense coverage of plants, shrub and trees. Therefore, its loss as part of the proposed development proposal would be notable but not identified as resulting in the loss of any protected habitat or species. However, it is also acknowledged that the landscaping plan included in the proposal would take advantage of the challenging change in levels across the application property to provide a coherent, navigable and softly landscaped environment that would enhance biodiversity and provide direct access to nature for multiple households. In particular, it is noted that the palette of shrubs to be planted would be diverse (i.e. sixteen types of plantings), feature trees would be planted to add to both diversity and visual amenity, and 50.0sqm of hard-standing would be converted to landscaped areas. As a result of the reduction in hard-standing, the breakdown of the approximately 900.0sqm site would be: 150.0sqm of hard-standing, 250.0sqm of roof area, and 500.0sqm of gardens and landscaped areas.

### Trees

- 8.40 In order to protect and enhance the borough's woodlands, trees and hedgerows, the Council requires all development proposals to comply with the recommendations of BS5837 2012 (Trees in relation to design, demolition and construction) or equivalent and resists development that would result in the avoidable loss or the excessive pruning of preserved trees or retained trees (Croydon Local Plan -- Policy DM28).
- 8.41 While the proposal would involve the loss of multiple mature trees, it is noted that the trees to be felled were no higher than Category C. Additionally, the loss of a single group of trees and four (4) individual trees would be off-set by the planting of six (6) feature trees in the front garden and twenty-one (21) trees in the rear

garden. In regard to the trees to be planted, Council's Tree Officers noted that the type proposed would be acceptable in terms of canopy, height and species. To ensure that the final details of the proposed tree planting programme is acceptable and the plan is implemented in full, this recommendation includes a Landscaping Management plan condition designed to secure the submission and approval of the aforementioned details and programme prior to the first occupation of the development.

### **Local Transport**

- 8.42 Development within the borough and Greater London is expected to deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling. (London Plan - Policy T2; Croydon Local Plan - Policies DM16, DM29 and SP8). Therefore, the cumulative impacts of development on public transport and the road network capacity (incl. walking and cycling), as well as associated effects on public health must be considered and mitigated (London Plan - Policy T4). Additionally, development proposals must also avoid increasing highway danger (London Plan - Policy T4).
- 8.43 The application site has a moderate access to public transport (PTAL Rating of 3) and vehicle access is not constrained by any bus routes or parking restrictions along The Grove. Therefore, future occupants of the proposed development would be able to select from a variety of modes of transport including: walking, cycling, using public transport and driving a private vehicle.

### Access Arrangements

- 8.44 Pedestrians would be able to access the main building from street level via steps leading to a front entrance and footpath through to an entrance in the basement level. As such, future occupants would be provide with a traditional 'front door' and accessible step-free route. The latter would also provide access for cyclists. An adjoining driveway would provide vehicular access to the property. It would require a re-design of the existing vehicle crossover resulting in the formation of a suitably 3.9m wide dropped kerb. This redevelopment would have no impact on existing street trees and the proposed visibility splays would be acceptable. Nevertheless, this recommendation includes a landscaping condition that would ensure the boundary treatments and steps in close proximity to the vehicle access would not be a detriment to pedestrian, cyclist and vehicle safety. Additionally, conditions regarding a Construction Logistics Plan, highways conditions survey, threshold levels, and a Section 278 Legal Agreement are also included.

### Car Parking

- 8.45 According to the London Plan (2021), a development providing two (2) one-bedroom units, two (2) three-bedroom units and four (4) two-bedroom units in an area with a PTAL Rating of 2-3 should provide no more than six and a half (6.5) vehicle parking space (Table 10.3). As the proposal includes six (6) off-street parking spaces, it is in line with the requirements of the London Plan (2021) and its strategic objectives to discourage unsustainable travel patterns, which can mean not providing the maximum number of spaces allowed.



- 8.46 On suburban sites such as the host property, the Council would normally expect a residential development to generate a demand of one (1) vehicle parking spaces per dwelling unit. As such, the proposal would be expected to generate a demand for eight (8) vehicle parking space resulting in an overspill from the development site onto local streets of two (2) vehicles. A Parking Survey of local streets within 200m of the application site submitted by the Applicant concluded that the proposed development, as well as, other consented developments within 250.0m of the application site would not unduly increase local on-street parking stress since these streets displayed sufficient capacity both during the day and overnight.
- 8.47 Considering how close future occupants would be local bus stops, shops and Coulsdon Town rail station and the fact that they would be provided with amenities to accommodate cycling, it is noted that sustainable modes of transport would make car-free lifestyles viable. Furthermore, the development would be required to contribute to improving sustainable transport in the area and future occupants would be prohibited from obtaining parking permits in the area if on-street parking stress were to become unsustainable and require the implementation of a local CPZ.
- 8.48 Swept paths for the parking spaces are provided (using a 4.8m car as required), demonstrating that the spaces are accessible for ingress and egress in forward gear. As two of the six vehicle parking spaces (i.e. 33%) would be provided with active electric vehicle charging points (EVCPs) and the remaining with a passive provision, the proposal would exceed the relevant requirements of Policy T6.1 the London Plan (2021). One disabled car parking space is provided with extra width to enable manoeuvring. It is noted that disabled parking bays are normally required to have transfer spaces on both sides of the parking bay. In this case, there is a transfer space on one side only. With the space available in the lower ground floor parking area, to achieve a transfer space on both sides would result in the loss of one of the other car parking spaces. This has been assessed and in this case, on balance, it is considered that it is preferable not to lose one of the other car parking spaces. In this case, it is accepted that the disabled parking bay will only have a transfer space on one side. It is considered that there is adequate manoeuvring space within the parking area to allow a driver wanting to access the disabled parking space to be able to manoeuvre to park in this space with the driver's door adjacent to the transfer space.
- 8.49 A contribution of £12,000 will be secured via S106 agreement to contribute towards sustainable transport initiatives in the local area including on street car clubs with electric vehicle charging points (EVCPs) within the South Croydon / Purley Oaks area 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 will 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. Additionally, the S106 agreement would also prohibit occupants of the development from obtaining parking permits in any future local CPZ. Every residential unit is to be provided with a minimum 3-year membership to a local car club scheme upon 1st occupation of the unit. Funding will also be used for extension and improvements

to walking and cycling routes in the area and improvements to local bus stops to support and encourage sustainable methods of transport.

- 8.50 Conditions will be attached to require a condition survey of the surrounding footways, carriageway and street furniture prior to the start of any works on site. This would need to be accompanied by photos and a report of any areas which may be of concern (this would be secured as part of the CLP condition). Given the site's location a Construction Logistics Plan (CLP) is required and will be secured by condition.

### Cycle Parking

- 8.51 In order to encourage the use of cycling as a primary mode of transport, the redevelopment would be required to provide two (2) short-stay cycle parking spaces and fifteen (15) covered and secured long-stay cycle storage spaces as per Table 10.2 of the London Plan (2021). According to the Proposed Plans, a suitably design cycle storeroom within the basement level would be able to provide all of the requisite spaces and in acceptably accessible manner. Therefore, this recommendation includes a cycle storage condition that would secure the required provision.

## **Environmental Sustainability**

### Air Quality & Water Use

- 8.52 In order to reduce greenhouse gas emissions and deliver development that is adaptable in a changing climate, the Council requires minor new-build residential developments to achieve the national technical standard for energy efficiency in new homes (2015) and all new-build residential development to meet a minimum water efficiency standard of 110.0l per person per day (Local Plan - Policy SP6). In this regard, Energy Statement (ref. 8649) prepared by Base Energy Services Ltd. notes that the proposal would achieve both targets. Therefore, this recommendation includes an Emission Rate & Water Use condition designed to ensure future compliance.

### Flood Risk Management

- 8.53 In order for the Council to ensure that development within the borough reduces flood risk and minimises the impact of flooding, Policy DM25 of the Croydon Local Plan (2018) requires development proposed within areas at risk of flooding development to incorporate flood resilience and resistant measures into the design, layout and form of buildings to reduce the level of flood risk both on site and elsewhere.
- 8.54 As the application site is located within a Critical Drainage Area, the applicant submitted a requisite Flood Risk Assessment (FRA). According to the submitted FRA, the proposed development would help manage flood risk through the installation of a Sustainable Urban Drainage System (SUDs) that would incorporate the utilisation of rainwater recycling (i.e. water butts), provision of additional and appropriately-designed green infrastructure (incl. 50.0sqm reduction in hard-standing) to allow for rain water attenuation, and formation of

soakaways to gradually disperse surface water. Considering the scale of the proposed development and identified flood risks, this SUDS proposed would be acceptable. Therefore, this recommendation includes a SUDs condition designed to ensure that the identified measures are installed and the maintenance plan implemented.

### **Waste Management**

8.55 The London Plan (2021) requires new housing to provide adequate and easily accessible storage space that supports the separate collection of dry recyclables and food waste, as well as, residual waste (Policy D6). It is supported locally by Croydon's Waste and Recycling in Planning Policy Document (2018) that requires a flatted development of the proposal's size and arrangement to provide enough bins and bin storage space within the curtilage of the property to handle the approximately 76.8l of food waste, 1,024.0l of recycling waste and 1,140.0l of landfill waste that would be generated by the proposed dwellings on a weekly basis (Section 2). According to the drawings submitted with the application, there is sufficient space within the basement level of the proposed two-storey building to integrate the requisite waste storage facilities. Therefore, this recommendation includes a Waste Storage Management condition designed to secure the provision of the requisite facilities and management procedures.

### **Fire Safety**

8.56 According to Policy D12 of the London Plan (2021), all development proposals must achieve the highest standards of fire safety and ensure that they identify suitable outdoor space for fire appliances and assembly points; incorporate appropriate fire safety features; minimise the risk of fire spread; provide suitable and convenient means of escape (incl. a robust strategy for evacuation); and suitable access and equipment for firefighting.

8.57 The details on fire safety and risk management contained within the Planning Statement prepared by HTA Design LLP are considered to provide sufficient and appropriate fire safety measures/procedures in accordance with regional policy. This recommendation includes a Fire Safety condition designed to ensure that the identified measures/procedures are implemented.

### **Conclusion**

8.58 The proposed development would considerably optimise the housing potential of a large suburban property through the erection of a sympathetically-design two-storey building that would be a positive addition to the local street scene, provide high-quality dwelling units with the necessary supporting amenities, and contribute to biodiversity, sustainable transport and urban greening. Furthermore, the comprehensive design and layout of the proposed development would help meet local and regional objectives on providing the housing Londoners need (incl. family-sized homes) without generating any detrimental impacts on fire safety, local amenity and local transport. Therefore, it is recommended that Planning Permission be **GRANTED**.

### Other Matters

- 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.
- 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.