1.0 SUMMARY OF APPLICATION DETAILS

Ref: 18/04839/FUL

Location: 31 Riddlesdown Road, Purley CR8 1DJ

Ward: Purley Oaks and Riddlesdown

Description: Proposed demolition of existing 2 storey detached house and

garage, and the erection of new 3 storey flat block including for 8 apartments, amended access / parking provision &

landscaping

Drawing Nos: 2017.107.03 C; 2017.107.11 D; 2017.107.18 C; 2017.107.17 C;

2017.107.16 C; 2017.107.12 D; 2017.107.10 C; 2017.107.19 C;

2017.107.15 B; 2017.107.14 C and 2017.107.13 B

Applicant: Mr Patel (Patel Property Ltd)

Agent: Mr Patrick Stroud
Case Officer: Robert Naylor

	studio	1 bed	2 bed	3 bed	4 bed
Apartments	0	4 (2 person)	2 (4 person)	1 (4 person)	0
				1 (6 person)	

All units are proposed for private sale

Number of car parking spaces	Number of cycle parking spaces
6 (including one disabled space)	14

1.1 This application is being reported to committee because the ward councillor (Cllr Simon Hoar) has made representations in accordance with the Committee Consideration Criteria and requested committee consideration. Furthermore, objections above the threshold in the Committee Consideration Criteria have been received.

2.0 RECOMMENDATION

- 2.1 That the Planning Committee resolve to GRANT planning permission
- 2.2 That the Director of Planning and Strategic Transport has delegated authority to issue the planning permission and impose conditions and informatives to secure the following matters:

Conditions

- 1. Development to be carried out in accordance with the approved drawings and reports except where specified by conditions
- 2. Materials to be submitted
- 3. Hard and soft landscaping to be submitted
- 4. Child play space
- 5. Details of cycle parking and refuse store
- 6. Obscured glazing
- 7. Car parking to be provided in accordance with details to be agreed
- 8. Details of electric vehicle charging point to be submitted

- 9. Permeable forecourt material
- 10. Construction Logistics Plan to be submitted
- 11. 19% Carbon reduction
- 12. 110litre Water usage
- 13. In accordance with details of Flood Risk Assessment
- 14. In accordance with the findings and recommendations of the Preliminary Ecological Survey
- 15. Accessibility requirements
- 16. Time limit of 3 years
- 17. Any other planning condition(s) considered necessary by the Director of Planning and Strategic Transport

Informatives

- 1) Community Infrastructure Levy
- 2) Code of practise for Construction Sites
- 3) Wildlife protection
- Any other informative(s) considered necessary by the Director of Planning and Strategic Transport

3.0 PROPOSAL AND LOCATION DETAILS

- 3.1 The proposal includes the following:
 - Demolition of the existing detached house
 - Erection of a three storey building including roofspace accommodation
 - Provision of 4 x one bedroom flats; 2 x two bedroom flats and 2 x three bedroom flats accessed via Riddlesdown Road
 - Provision of 6 off-street spaces with associated access via Riddlesdown Road
 - Provision of associated refuse/cycle stores
 - Amended plans were received on the 10th June 2019 incorporating inset balconies
 to flats 3 and 6 at first and second floor respectively, and amending the unit mix from
 3 x one bedroom flats, 3 x two bedroom flats and 2 x three bedroom flats, to 4 x one
 bedroom flats, 2 x two bedroom flats and 2 x three bedroom flats to accommodate
 this change. In addition, obscure glazing was provided to the bin store on the ground
 floor.

Site and Surroundings

- 3.2 The application site is a large detached property located on the eastern side of Riddlesdown Road. The topography of the site is undulating with Riddlesdown Road located on a hill sloping from south to north, whilst the property is located at the top of a steep driveway and the rear garden set up significantly higher at the rear than at the front of the property.
- 3.3 The surrounding area is residential and the current host property and many of the properties here occupy fairly generous plot sizes. There is no distinct style in regard to the properties along Riddlesdown Road, however the majority along this section appear as single family dwellinghouses. More recently a number of schemes for flats have been approved in the vicinity as noted in the Planning History below. The site is located within a Tier 2 Archaeological Priority Area.



Figure 1: Aerial street view highlighting the proposed site within the surrounding streetscene

Planning History

- 3.4 In terms of recent planning history at the site there is nothing of relevance. However Members will be aware that there are have been similar types of schemes submitted and approved as detailed below:
 - 80 Riddlesdown Road planning permission granted for nine flats (Ref: 18/00812/FUL)
 - 96a Riddlesdown Road planning permission granted for nine flats (Refs: 17/04385/FUL and 18/01032/CONR) Works have commenced and the host property has been demolished, and building works are under construction.
 - 98 Riddlesdown Road planning permission has been granted for nine flats (Ref: 18/05154/FUL).
 - 122 Riddlesdown Road planning permission granted for nine flats (Refs: 17/02724/FUL; 17/05176/NMA and 17/05069/CONR) Works have commenced and the host property has been demolished, and building works are under construction.

4.0 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The principle of the development is acceptable given the residential character of the surrounding area.
- The design and appearance of the development is appropriate.

- The living conditions of adjoining occupiers would be protected from undue harm subject to conditions.
- The living standards of future occupiers are satisfactory and Nationally Described Space Standard (NDSS) compliant
- The level of parking and impact upon highway safety and efficiency is considered acceptable and can be controlled through conditions.
- Sustainability aspects can be controlled by conditions.

5.0 CONSULTATION RESPONSE

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 has been publicised by 14 letters of notification to neighbouring properties in the vicinity of the application site. The number of representations received from neighbours, local groups (Purley & Woodcote Residents Association) etc in response to notification and publicity of the application are as follows:
 - No of individual responses: 22 Objecting: 21 Supporting: 0 Comment: 1
- 6.2 The following issues were raised in representations. Those that are material to the determination of the application, are addressed in substance in the MATERIAL PLANNING CONSIDERATIONS section of this report:

Summary of objections	Response				
Principle of development					
Overdevelopment and intensification	Addressed in the report at paragraph 8.6				
Poor quality development	Addressed in the report at paragraphs 8.16 – 8.18				
Loss of family house	Addressed in the report at paragraph 8.5				
Design					
Out of character	Addressed in the report at paragraphs 8.8 – 8.15				
Over intensification – Too dense	Addressed in the report at paragraph 8.6				
Visual impact on the street scene (Not in keeping)	Addressed in the report at paragraphs 8.13 – 8.14				
Lack of accessible provision	Addressed in the report at paragraph 8.18				
Number of storeys	Addressed in the report at paragraphs 8.8 – 8.9				
Amenities					
Negative impact on neighbouring amenities	Addressed in the report at paragraphs 8.19 – 8.31				
Loss of light	Addressed in the report at paragraphs 8.19 – 8.31				

Loss of privacy	8.19 – 8.31				
Overlooking	Addressed in the report at paragraphs				
	8.19 – 8.31				
Disturbance (noise, light, pollution,	Addressed in the report at paragraph				
smells etc.)	8.31				
Refuse store too small	Addressed in the report at paragraph				
	8.37				
Traffic & Parking					
Negative impact on parking and traffic in	Addressed in the report at paragraphs				
the area	8.32 – 8.38				
Not enough off-street parking	Addressed in the report at paragraphs				
	8.32 – 8.38				
Negative impact on highway safety	Addressed in the report at paragraphs				
	8.32 – 8.38				
Inadequate refuse and recycling	Addressed in the report at paragraph				
provision	8.37				
Other matters					
Construction disturbance	Addressed in the report at paragraph				
	8.38				
Impact on wildlife	Addressed in the report at paragraph				
	8.43 – 8.44				
Impact on flooding	Addressed in the report at paragraph				
_	8.39 – 8.41				
Restrictive covenants at the site	Addressed in the report at paragraph				
	8.48				
	<u> </u>				

Addressed in the report at paragraphs

- 6.3 The following Councillors made representations:
 - Cllr Simon Hoar (Purley Oaks and Riddlesdown Councillor)
 - 1. Out of keeping with the streetscene and local housing style
 - 2. Insufficient parking on a busy emergency access road
 - 3. One of the three bed units has no amenity space and is therefore not suitable for future occupiers
 - 4. Loss of privacy and amenity for neighbouring residents
- 6.4 The Purley & Woodcote Residents Association have made the following representations:
 - Loss of a good quality family home
 - Gross overdevelopment of site
 - Inadequate amenity

Loss of privacy

Out of character of the area

7.0 RELEVANT PLANNING POLICIES AND GUIDANCE

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

Development Plan consists of the Consolidated London Plan 2015, the Croydon Local Plan 2018 and the South London Waste Plan 2012.

- 7.2 Government Guidance is contained in the National Planning Policy Framework (NPPF), revised in 2019. The NPPF sets out a presumption in favour of sustainable development, requiring that development which accords with an up-to-date local plan should be approved without delay. The NPPF identifies a number of key issues for the delivery of sustainable development, those most relevant to this case are:
 - Delivering a wide choice of high quality homes;
 - Requiring good design;
 - Promoting sustainable transport.
- 7.3 The main policy considerations raised by the application that the Committee are required to consider are:

7.4 Consolidated London Plan 2016

- 3.3 Increasing housing supply
- 3.4 Optimising housing potential
- 3.5 Quality and design of housing developments
- 3.8 Housing choice
- 5.1 Climate change mitigation
- 5.2 Minimising carbon dioxide emissions
- 5.3 Sustainable design and construction
- 5.12 Flood risk management
- 5.13 Sustainable drainage
- 5.16 Waste net self sufficiency
- 6.3 Assessing effects of development on transport capacity
- 6.9 Cycling
- 6.13 Parking
- 7.2 An inclusive environment
- 7.3 Designing out crime
- 7.4 Local character
- 7.6 Architecture
- 7.21 Woodlands and trees

7.5 Croydon Local Plan 2018

- SP2 Homes
- SP6.3 Sustainable Design and Construction
- DM1 Housing choice for sustainable communities
- DM10 Design and character
- DM13 Refuse and recycling
- DM18 Heritage assets and conservation
- DM23 Development and construction
- DM28 Trees
- DM29 Promoting sustainable travel and reducing congestion
- DM30 Car and cycle parking in new development
- DM42 Purley

- 7.6 There is relevant Supplementary Planning Guidance as follows:
 - London Housing SPG March 2016
 - Croydon Suburban Design Guide Supplementary Planning Document April 2019

8.0 MATERIAL PLANNING CONSIDERATIONS

- 8.1 The main planning issues raised by the application that the Planning Committee are required are as follows:
 - 1. Principle of development
 - 2. Townscape and visual impact
 - 3. Housing quality for future occupiers
 - 4. Residential amenity for neighbours
 - 5. Access and parking
 - 6. Sustainability and environment
 - 7. Trees and landscaping
 - 8. Archaeological Priority Zones
 - 9. Other matters

Principle of Development

- 8.2 The London Plan and Croydon Local Plan identify the appropriate use of land as a material consideration to ensure that opportunities for development are recognised and housing supply optimised. It is acknowledged that windfall schemes which provide sensitive renewal and intensification of existing residential areas play an important role in meeting the demand for additional housing in Greater London, helping to address overcrowding and affordability issues.
- 8.3 The site has been identified by the developer as a windfall site and as such it could be suitable for sensitive renewal and intensification. The residential character of the surrounding area is fairly uniform and consists of large detached houses on relatively large plots, developed at a relatively low density.
- 8.4 The application is for a flatted development providing additional high quality homes within the borough, which the Council is seeking to promote, and also provides 2 three bedroom family units, which the borough has an identified shortage of. Whilst providing flatted accommodation, the proposal has been designed to appear as a large detached dwelling-house which would maintain the overall character of the area, in keeping with neighbouring properties. This is a similar approach to the four previously mentioned granted schemes within Riddlesdown Road. The scheme involves the removal of six trees (3 Category U; 1 Category C and 2 Category B) to the front of the site (See Trees and Landscaping section) however these are of relatively low amenity value and the loss of these will be mitigated through the provision of replacement trees and shrubs towards the front of the property.
- 8.5 The Croydon Local Plan (Policy DM1.2) seeks to prevent the loss of small family homes by restricting the net loss of three bed units and the loss of units that have a floor area less than 130sqm. Given that the existing property is neither a 3 bedroom home (as originally built) or smaller than 130sqm its loss is therefore acceptable, subject to a replacement 3 bed property being provided (to ensure that there is no net loss of family accommodation which would discord with policy SP2.7(a)). In this instance the proposal seeks to provide two 3 bed units along with two 2 bed 4 person

units, providing accommodation for smaller families. The overall mix of accommodation, given the relatively small size of the site which limits the number of larger units that can be realistically provided, would be acceptable and would result in a net gain in family accommodation.

Townscape and Visual Impact

- 8.6 There are a variety of house types and styles in the vicinity, including various bungalows, semi-detached and detached two storey properties with accommodation in the roofspace. The proposal seeks the demolition of the existing property and erection of eight units over three storeys. The existing property is not protected from demolition by existing policies and its demolition is deemed acceptable subject to a suitably designed replacement building coming forward. The scheme has been specifically designed to resemble a large detached property, rather than a block of flats. Officers are satisfied that the scheme respects the street-scene.
- 8.7 The Croydon Local Plan has a presumption in favour of three storey developments and the application seeks to provide a three storey property providing a high quality built form that respects the pattern, layout and siting in accordance with Policy DM10.1 and Suburban Design Guide SPD (SDG SPD). There are a number of other developments in the area that have adopted a similar approach, which have also been assessed against the policies of the CLP and have been found acceptable. The height, scale and massing of the scheme would be acceptable, given that the site works well with the topography and surrounding streetscene.

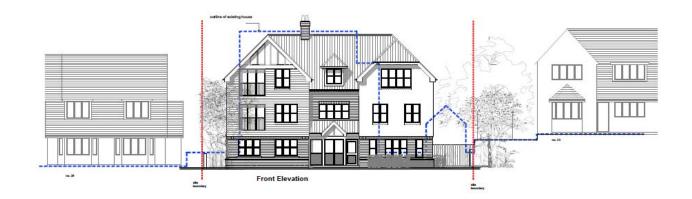


Figure 2: Elevational view highlighting the proposal in relation to neighbouring properties

- 8.8 The design of the building would incorporate a traditional Arts and Crafts styled appearance (albeit a contemporary interpretation) consisting of an asymmetrical design with a more predominant gable with a subservient semi-hipped gable to the front elevation. This will maintain the overall street scene with use of an appropriate materials palette (Tudor boarding; facing red stock bricks; red plain tiles, uPVC windows and appropriate use of render) with an adequate balance between brick and glazing and appropriate roof proportions.
- 8.9 The application site has a fairly large rear garden which is not visible from the public highway or any public vantage points and would be utilised for communal amenity space. As with the majority of properties in the immediate surroundings, the proposed building would be centrally located which would mean that the development would not

appear overly cramped in its plot. Whilst the frontage would be given over to hardstanding to allow for off street parking for the new dwellings there would be an area of soft landscaping along the boundary of the site to soften the appearance. This would generally reflect the arrangement of the neighbouring buildings and would be acceptable.



Figure 3: Ground floor plan proposed site showing proposal in relation to neighbouring properties

- 8.10 Policy DM10.2 seeks to create well defined and designed public and private spaces and advises that forecourt parking should only be allowed where it does not cause undue harm to the character or setting of the building and is large enough to accommodate parking with sufficient screening to prevent vehicles encroaching on the public highway. Given the overall scale of the development and number of forecourt hardstanding areas in the vicinity, the extent of hardstanding would not be excessive. The site would offer sufficient opportunities for soft landscaping to the Riddlesdown Road frontage as well as between the proposed development and the neighbouring property to the rear and would be acceptable.
- 8.11 The application site is a substantial plot within an established residential area and is comparable in size to other flatted and neighbouring back-land developments approved throughout the borough. As with these previous schemes, the scale and massing of the new build would generally be in keeping with the overall scale of development found in the immediate area and the layout would respect the pattern and rhythm of the neighbouring area.
- 8.12 The Croydon Local Plan indicates that the appropriate level of growth for any given location depends upon its existing local character. The capacity for natural evolution is

dependent upon the local character typology, with the objective of the evolution of local character to achieve an intensification of use without major impacts on local character. Nevertheless each character type has capacity for growth. The proposal has been designed to resemble a large house on a large plot rather than a block of flats as indicated by representations, and is a sensitively designed three-storey scheme which is considered to provide a more intensive use of the site in accordance with policy DM10.1 and is thus appropriate.

- 8.13 In respect of the density of the scheme, representations have raised concern. The site is a suburban setting with a PTAL rating of 2 and as such, the London Plan indicates that a suitable density level range is between 150-200 habitable rooms per hectare (hr/ha). Whilst the proposal would be in excess of this range (255 hr/ha) it is important to note that the London Plan indicates that it is not appropriate to apply these ranges mechanistically, and also provides sufficient flexibility for higher density schemes (beyond the density range) to be supported where they are acceptable in all other regards. In this instance the proposal is otherwise acceptable, respecting the character and appearance of the surrounding area, and does not demonstrate clear signs of overdevelopment (such as poor quality residential units or unreasonable harm to neighbouring amenity). As such the density of the proposed development is acceptable.
- 8.14 Having considered all of the above, against the backdrop of housing need, officers are of the opinion that the proposed development would comply with the objectives of the above policies and SDG SPD in terms of respecting local character.

Housing Quality for Future Occupiers

- 8.15 All the units of the proposal would comply with internal dimensions required by the Nationally Described Space Standards (NDSS), and are acceptable.
- 8.16 With regard to private amenity space, following amendments all eight units would have access to private amenity space. It is noted however that the two 2 bed 4 person units have balconies which are 2sqm below the requirement set out by DM10.4 of the CLP, however both of these units are triple aspect, have an internal floor area 8sqm in excess of the NDSS, and as such are both considered to provide a good level of accommodation for their future occupants. In addition a large communal garden is provided at the rear of the site which is capable of providing the required playspace, with such matters being secured through condition.
- 8.17 In terms of accessibility, level access would be provided from the front door to the ground floor units (which include the 2 x three bed family units). The London Plan states that developments of four stories or less require disabled unit provisions to be applied flexibly to ensure that the development is deliverable. Given the limitations of the footprint and the overall scale of development proposed, it has not been possible to provide a lift for this development and as such the above ground units would not be fully accessible. Nonetheless however it is considered that one of the ground floor units could be Part M4(3) compliant (wheelchair accessible), and this can be secured by condition. A disabled space is proposed within the parking area.

Residential Amenity for Neighbours

8.18 There are a number of properties that adjoin the site which include 29 Riddlesdown Road to the north of the site; 33 Riddlesdown Road to the south of the site; 54 Grasmere Road to the west; and the rear of properties 24 and 24a Purley Bury Avenue to the east as illustrated in figure 4 below:



Figure 4: Plan highlighting the existing site and the relationship with the adjoining occupiers. (Not to a scale)

29 Riddlesdown Road

- 8.19 The proposed development has a similar front building line to the existing property and as such would have limited impacts on the amenity of this neighbouring property at the front. Despite projecting beyond the rear building line of number 29 the proposal has been located behind a 45 degree angle, and as such the scheme would pass the 45 degree BRE test for loss of light to the rear elevation windows. The applicant has undertaken a BRE study which indicated that the scheme would not provide any significant loss of existing sunlight or daylight levels to adjoining occupiers.
- 8.20 The windows in the side elevation facing number 29 are a mixture of high level windows and roof lights and given the lack of existing windows in the flank elevation at the adjoining property it is unlikely that there would be any additional overlooking or loss of privacy experienced from these units.
- 8.21 The ground floor windows would be located behind a close-boarded fence to the shared boundary. The ground floor side windows would be positioned to ensure there would be no harmful loss of privacy. On balance, the impact on this property is acceptable.



Figure 5: Existing relationship with 29 Riddlesdown Road and proposed facing flank elevation

33 Riddlesdown Road

- 8.22 As with the neighbouring property to the north of the site the proposed front building line of the proposal would be similar to number 33 albeit that the proposal would be located closer to the boundary with this property. Nevertheless there is a degree of separation (approx. 7m) which subject to landscaping work will maintain plot rhythm.
- 8.23 The main increase in depth most affecting the rear of the site, where the proposed development would be slightly closer to the boundary with the neighbouring property is where the garden tapers. However there are large garden areas maintained for both properties and it is not considered that the proposal would result in a significant sense of enclosure to the garden.





Figure 6: Photos highlighting the existing flank elevations between 33 (left) and application site (right)

8.24 The property at 33 is located in a slightly elevated position (compared to the application site) given the topography and has windows in the flank elevation at the upper floors serving a hallway and bedroom and secondary ground floor windows serving a kitchen. The proposal would provide high level windows at first floor which have been indicated as obscured glazed and high level roof lights. It is unlikely that they would provide

- either actual or perceived levels of overlooking and loss of privacy. Nevertheless it is considered prudent to condition obscure glazing to ensure that any future overlooking is avoided along the flank elevations.
- 8.25 The neighbour raised some concerns in regard to the scheme and the potential loss of light and commissioned a Right of Light Consult who produced a preliminary report. Following this, the developer appointed their own surveyor to complete a BRE study and the two parties have since reached agreement and amended the scheme accordingly to comply with the BRE recommendation. Furthermore only a small section of the single storey of the proposal at the rear would breach the BRE 45 degree line, however given the studies and compromises undertaken this would not create a significant loss of light or provide an overbearing or dominant impact on this property.
- 8.26 On balance, given the orientation, removal of existing windows, siting of the existing building and landscaping treatment and use of landscaping conditions, the proposal is considered acceptable in terms of its amenity impact on number 33.

54 Grasmere Road

8.27 The separation between these properties and the proposal is in excess of 20m and there is a significant landscaped boundary and Riddlesdown Road (See figure 7 below) located between these properties. The degree of separation is acceptable.



Figure 7: Separation between the application site and 54 Downs Road

Properties in Purley Bury Avenue

8.28 These properties are located to the rear of the site with the separation distance between the properties being in excess of 40m and there is significant established vegetated boundary located between the application site and these properties which is to be retained and enhanced to ensure this relationship is acceptable.



Figure 8: Distance and boundary between site proposal and Purley Bury Avenue

8.29 Given that the proposal is for a residential use in a residential area the proposed development would not result in undue noise, light or air pollution from an increased number of occupants on the site. Subject to conditions the proposed development would not be visually intrusive or result in a loss of privacy.

Access and Parking

- 8.30 The site is located within a PTAL of 2 which is poor. The London Plan sets out maximum car parking standards for residential developments based on public transport accessibility levels and local character. This states that 1-2 bedroom properties should provide a maximum of up to 1 space per unit, with up to 1.5 spaces per unit being provided for 3 bedroom properties. In line with the London Plan, the proposed development could therefore provide up to a maximum of 9 spaces. It is important to note however that it is not necessarily desirable to provide car parking up to the maximum standards given the requirements of both the London Plan and Croydon Local Plan which seek to reduce reliance on car usage and promote/prioritise sustainable modes of transport. As such a lower level of car parking can be supported and is encouraged in line with the ambitions of the Development Plan.
- 8.31 Whilst the scheme provides 6 off-street parking spaces, which is below the maximum standards allowable, the applicant has undertaken a parking survey stress report which estimates the parking demand for the proposal being 5.55 spaces. As such the proposed provision of 6 parking spaces on site would be an adequate provision. The applicant has also undertaken a parking beat survey using the Lambeth Methodology which highlights that there is a parking stress occupancy over the surveyed days ranging from 44%-51% respectively, which indicates that there would be sufficient onstreet capacity to accommodate any potential overspill in the event future occupiers of the development had a notably greater demand for car parking beyond that estimated.
- 8.32 The development therefore provides sufficient parking for the future use of the residents. If there was a spill over the Lambeth Methodology indicates that there is sufficient parking spaces on-street to accommodate this without adverse impacts on the amenity of existing residents in the area.

- 8.33 Representations state that a lack of parking provision will have an impact on highway safety. In respect of highway safety, the scheme provides 6 off-street parking spaces and these will need to adhere to the parking visibility splays and parking standards to ensure that safety requirements are adhered to and these will be secured through conditions. There have been representations that there have been a number of accidents in the area, with the road accident statistics indicating that since 2001 there have been fourteen minor road accidents within a 200m radius of the site. The network and transport impacts associated with the developments on traffic and transport would be negligible and it is unlikely to have a significant impact on highway safety.
- 8.34 There is a large existing area of hardstanding on the frontage, and the proposal would have additional spaces, whilst allowing for some planting which can be secured through a condition. The parking layout and access arrangements permit access and exit movements in a forward gear and would be acceptable subject to a condition providing the suitable visibility splays and as such would not harm the safety and efficiency of the highway network.
- 8.35 In compliance with the London Plan, electric vehicle charging points would be installed in the parking area and this can be secured by way of a condition. Cycle storage facilities would comply with the London Plan (which would require 14 spaces) and these are located to the rear of the building within a standalone unit and would be secure and undercover, although further details will be secured by way of a condition. Further details of the refuse store would also be secured by condition.
- 8.36 Concerns have also been expressed in regard to the amount and type of excavation required at the site and further details are required as part of a construction method statement. A Demolition/Construction Logistic Plan (including a Construction Management Plan) will need to be submitted prior to commencement of work and can be secured by condition.

Environment, flooding and sustainability

- 8.37 Conditions will be attached to ensure that a 19% reduction in CO2 emissions over 2013 Building Regulations is achieved and mains water consumption would meet a target of 110 litres or less per head per day.
- 8.38 The applicant has submitted a Flood Risk Assessment (FRA) which highlights that the site is located in Flood Zone 1 and according to the Environment Agency has a very low probability of fluvial and or tidal flooding, is not located in a Critical Drainage Area, and has a low risk from surface water flooding. The FRA does however indicate that the site has the potential for groundwater flooding at the surface and this will be appropriately managed using a sustainable urban drainage scheme (SuDS).
- 8.39 The FRA concludes that infiltration SuDS techniques will be employed to deal with the surface water runoff from the developed site. The surface water runoff will be managed using a combination of soakaways and pervious pavements (permeable paving or resin bound surface) with further details being secured by condition.

Trees and ecology

8.40 There are no trees on site subject to a tree preservation order. 9 trees and shrubs will be removed from the site; 2 Category B trees; 4 Category C trees and 3 Category U trees, and are highlighted in red in figure 9 below. The trees that will be lost have a low impact on the local character and subject to a condition on landscaping and tree protection there is no objection to the scheme on arboricultural grounds.



Figure 9: Extract from tree protection plan showing trees to be removed (outlined in red)

- 8.41 In regard to ecology a Preliminary Ecological Appraisal of the site has been undertaken which found that no direct neighbouring habitats including SSSI's or LNR's will suffer disturbance from the development.
- 8.42 The site offers limited value to protected species other than bats which were recorded in the report. Given these concerns a further assessment was required with emergence surveys during the optimal survey season. The applicant has waited until May (the optimal survey season) to undertake the emergence surveys which have indicated that bats are not present within the site. The Preliminary Ecological Survey does however make a recommendation to enhance ecological interests within the site; as such a condition is suggested in this regard.

Archaeological Priority Zones

- 8.43 The application site lies in an area of archaeological interest (a Tier 2 APA). The Greater London Archaeological Advisory Service (GLAAS) provides archaeological advice to boroughs in accordance with the National Planning Policy Framework and GLAAS Charter, and have been consulted as part of the application.
- 8.44 GLAAS have indicated that the current building is likely to have truncated any archaeological remains on the site and as such there is no ongoing archaeological interest on the site. No further assessment or conditions are therefore necessary.

Other matters

- 8.45 Representations have raised concerns that local schools and other services will be unable to cope with additional families moving into the area. The development will be liable for a charge under the Community Infrastructure Levy (CIL). This payment will contribute to delivering infrastructure to support the development of the area, such as local schools.
- 8.46 Representations have stated that the site is subject to restrictive covenants, however it should be noted that this is a civil matter and not a material planning consideration as such matters are not within the remit of planning control.

Conclusions

- 8.47 The principle of the proposed development is considered acceptable. The design of the scheme, both in terms of the building's architecture and the proposed landscaping of the site, is of an acceptable standard and subject to the provision of suitable conditions the scheme is acceptable in relation to residential amenity, transport, sustainability and ecological matters. As such the proposal is considered to accord with the Development Plan.
- 8.48 All other relevant policies and considerations, including equalities, have been taken into account.