

PART 6: Planning Applications for Decision

Item 6.1

1 SUMMARY OF APPLICATION DETAILS

Ref: 19/03282/FUL
 Location: 59-63 Higher Drive, Purley, CR8 2HR
 Ward: Purley and Woodcote
 Description: Demolition of existing buildings, erection of a three/four/five storey building comprising 40 residential units, provision of 24 car parking spaces and associated refuse and cycle storage.
 Drawing Nos: Site Location Plan PL_001rev.00; Proposed Lower Ground Floor PL_100rev.17; Proposed Upper Ground Floor & First Floors PL_101&102rev.15; Proposed Second Floor PL_103rev.15; Proposed Third Floor PL_104rev.15; Landscape & Roof Plan PL_050rev.15; Rear Elevation PL_202rev.15; Rear Elevation/Section PL_201rev.15; Flank Elevation @ South Boundary PL_204rev.15; Flank Elevation @ North Boundary PL_203rev.15; Street Elevation PL_200rev15; Brick Colour & Textures - Bay 3 – Right; Brick Colour & Textures - Bay 1 - Left Hand Side; Brick Colour & Textures - Bay 2 – Centre; Topographical Survey PL_040rev.00; Tree Constraints Plan CCL 10121/TCP Rev: 2; Impact Assessment Plan CCL 10121/IAP Rev: 1; Tree Protection Plan CCL 10121/TPP Rev: 1. Transport Statement U1911485L Version 2.2 (ML Traffic Engineers, October 2019); Planning Statement 59-63 Higher Drive (Macar Developments); Ecological Appraisal of 59-63 Higher Drive, Purley M1148.002 Issue 2 (Crossman Associates, 29 September 2019); Internal Average Daylight Study 6261 Rev.0 (Base Energy, 16.06.2019); External Average Daylight Study 6261 Rev.0 (Base Energy, 18.06.2019); Flood Risk Assessment L01433 Revision: 01 (Scott White and Hookins, 26-06-19); Energy Statement for Planning 6261 Rev.1 (Base Energy, 27.09.2019); BS 5837 Arboricultural Report ref. 10121 (Crown Tree Consultancy, 24th June 2019); Desk Study / Preliminary Risk Assessment Report P2209J1698/SRC Final v1.0 (JOMAS ASSOCIATES LTD, 07 June 2019); Design & Access Rev.C (MACAR Developments, 24/10/19).
 Applicant: Macar Developments Ltd
 Case Officer: Jan Slominski

	1 bed	2 bed	3 bed	4 bed
Market Flats	4	14	2	0
Affordable Rented	5	13	2	0
Totals	9	27	4	0

Type of floorspace	Amount proposed	Amount retained	Amount to be demolished
Residential	3,138 sq m	0 sq m	572 sq m

Number of car parking spaces	Number of cycle parking spaces
24	76

- 1.1 This application is being reported to Planning Committee because objections above the threshold in the Committee Consideration Criteria have been received and Cllrs Paul Scott and Simon Brew made representations in accordance with the Committee Consideration Criteria and requested Planning Committee consideration.

2 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The site comprises three detached houses in a residential area. The proposal would replace the detached houses with 40 new flats, of which at least 50% would be affordable (delivered as London Affordable Rented homes) thereby providing a significant increase in new affordable homes within an existing established residential area.
- The five-storey building would be significantly taller than its surroundings and would evolve the local character whilst using land efficiently. Planning conditions are recommended to ensure that the development would use high quality materials, detailing and landscaping.
- The proposed development would not have an unacceptable impact on the living conditions of neighbouring occupiers.
- The standard of residential accommodation would be acceptable, with all units meeting the Nationally Described Space Standards (NDSS) with acceptable space, light and outlook; private amenity spaces; access to sufficient communal amenity and child play space.
- The parking and transport impacts of the development would be addressed by a combination of on-site parking spaces and planning obligations (including electric cycles and car parking restrictions).
- The proposed development would balance the efficient use of land and delivery of affordable homes against the need for good design and transport planning. On balance, the proposal is therefore considered acceptable in delivering a sustainable form of development.

3 RECOMMENDATION

- 3.1 That the Planning Committee resolve to GRANT planning permission subject to the prior completion of a legal agreement to secure the following planning obligations:

■ Affordable housing. 50% of units to be provided as affordable housing. All of those homes to be London Affordable Rent.

■ Travel Plan (and 3 Year monitoring)

■ Car club contribution of £5,000

■ A scheme for electric bicycle purchase: £20,000 to be held in Escrow for a period of 12 months to provide future residents with the opportunity to apply to Moat HA for a £500 voucher towards the purchase of an electric bike.

■ Highways contribution of £5,000 towards parking restrictions.

■ Bus route feasibility study contribution of £12,000

■ Footway survey and reinstatement if necessary

■ Air quality contribution £4,000

■ Carbon offset contribution (approximately £47,016, with the amount recalculated following construction).

■ Local Employment and Training Strategy (construction phase) including a financial contribution of £20,000.

■ Monitoring fees and payment of Legal fees

■ Any other planning obligation(s) considered necessary by the Director of Planning and Strategic Transport

- 3.2 That the Director of Planning and Strategic Transport has delegated authority to negotiate the legal agreement indicated above.
- 3.3 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

Commencement within three years (compliance)
Approved Plans (compliance)
Ecology (nesting and bats) (prior to commencement)
Contamination (prior to commencement)
SUDS (prior to commencement)
Construction and Environmental Management Plan (prior to commencement)
Thames Water/ Piling (prior to specific works)
Materials and Detailing (prior to superstructure)
Sample panels on site (prior to superstructure)
Secured by Design (prior to occupation)
Obscured Glazing (prior to occupation)
Landscaping (prior to occupation)
Trees (new planting) (prior to occupation)
Playspace (prior to occupation)
External lighting (and light pollution) (prior to occupation)
Public Art (prior to occupation)
Energy Strategy and carbon reduction (prior to occupation)
PV Panels (not to exceed parapet height) (prior to occupation)
Servicing and Deliveries (prior to occupation)
Visibility Splays (prior to occupation)
Parking Management Plan (prior to occupation)
Highways Works (S.278 Works) (prior to occupation)
No use of flat roofs (except designated terraces) (compliance)
Tree protection (compliance)
Accessible Homes (M4) (compliance)
Lifts (compliance)
Water Consumption (110l) (compliance)
Waste Storage (compliance)
Cycle Storage (compliance)
Electric Vehicle Charging Points (compliance)
Noise limits (plant) (compliance)
Any other planning condition(s) considered necessary by the Director of Planning and Strategic Transport, and

Informatives

London Fire Brigade (Demolition)
London Fire Brigade (New Build)
Ecology
Subject to legal agreement
Construction Logistics Plans
Flood Risk
Thames Water
Site notice removal
Any other informative(s) considered necessary by the Director of Planning

- 3.4 That the Planning Committee confirms that adequate provision has been made, by the imposition of conditions, for the preservation or planting of trees as required by Section 197 of the Town and Country Planning Act 1990.

3.5 That if by 5th March 2019 the legal agreement has not been completed, the Director of Planning and Strategic Transport has delegated authority to refuse planning permission.

4 PROPOSAL AND LOCATION DETAILS

Proposal

- The proposal is a single block of flats, replacing the three detached houses currently on the site.
- 40 new homes would be provided, of which 50% would be London Affordable Rented homes (delivered through a S.106 planning obligation). The applicant has advised that the whole site is to be sold to Moat (a Registered Provider) and it is likely that 100% of homes would become affordable in practice, although only 50% of these units has been committed to within the S.106 Agreement and the planning application must be determined on that basis.
- The building would be 3-5 storeys high, stepping up towards the middle of the site.
- There would be communal gardens and play-space at the rear.
- 10 car parking spaces would be provided within the front forecourt of the development with 14 further spaces provided internally - at lower ground floor level. As 24 spaces are proposed for 40 homes, several mitigation measures to reduce car dependence are to be secured in the S.106 Agreement (electric cycles, parking restrictions, a travel plan, a contribution to a local car club and a contribution to a feasibility study into an additional bus route).
- Cycle storage and bin storage would be provided internally.

Site and Surroundings

- 4.1 The site is located on the eastern side of Higher Drive, south of its junction with Woodland Way and north of All Saints and St Barnabas Church. The site comprises three residential plots (59, 61 and 63 Higher Drive) each occupied by a detached house set within expansive grounds.
- 4.2 Higher Drive is a predominantly residential street and the site is surrounded by houses to the west, north and east. To the south is St Barnabas Church and its grounds and the nearby buildings are predominantly detached houses of 2-3 storeys in height (including roof accommodation in some cases). The site slopes upwards towards the rear, away from the road. Due to the slope of the land, the houses opposite have lower ridges than those on the east side of the road.



Site Plan (existing buildings to be demolished in dotted lines)

4.3 The buildings on the street are varied in design although there are shared design characteristics, including deep landscaped front gardens, tiled pitched roofs, brick, tile hung and render elevations and horizontal windows. The following observations are made on the site's characteristics and planning constraints:

- The site is in Kenley Ward.
- The site is approximately 15 minutes' walk (1.1km) to Purley District Centre.
- It is also a 15 minute (1.1km) walk of Purley Rail Station and 13 minute (0.9km) walk of Reedham station.
- It has a Public Transport Accessibility Level (PTAL) of 1a/1b.
- The site is not within a Controlled Parking Zone (CPZ)
- The site is in a Critical Drainage Area.
- There are no heritage assets immediately adjacent to the site.
- The site is covered by a Tree Preservation Order (TPO) which protects 2 trees in the front gardens of 61 and 63 Higher Drive (TPO 144). There is a TPO to the rear of the site which covers all trees at 8 and 10 Woodland Way (TPO 31/1974).

4.4 Higher Drive is on a slope, with the walking routes to Purley and Reedham Stations being steeply sloping.

Planning History

- 4.5 The following planning decisions are relevant to the application site:
- 02/02112/P 63 Higher Drive. Erection of single/two storey rear extension.
Permission Granted.

5 CONSULTATION RESPONSES

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

5.2 The following were consulted regarding the application:

Thames Water

5.3 No objections raised, subject to conditions relating to sustainable drainage and a piling method statement (which are recommended).

London Fire Brigade

5.4 No objections raised to demolition subject to guidance provided on disposal of waste materials and no objections to the new building subject to compliance with the Building Regulations (informatives are recommended).

Crime Safety Officer

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

Ecology Advisor

5.6 No objection subject to securing biodiversity mitigation and enhancement measures (to be secured by conditions)

Local Lead Flood Authority (Statutory Consultee)

5.7 No objection subject to the recommended pre-commencement condition.

6 LOCAL REPRESENTATION

6.1 The application has been publicised by two site notices displayed in the vicinity of the application site. The application has also been publicised in the local press. The number of representations received from neighbours, local groups etc. in response to notification and publicity of the application were as follows:

No of individual responses: 169 Objecting: 167 Supporting: 0

6.2 Representations have been made from the following local groups/societies:

- Foxley Residents' Association

6.3 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
Housing Mix, Amount and Tenure	
The proposed homes are not needed.	The Council has a long waiting list of people in need of affordable homes and the proposal would provide much need affordable homes.
The proposal exceeds the London Plan Density Matrix, for which the London Plan requires justification	The proposal would provide an acceptable standard of accommodation and would avoid harm to neighbour amenity. The principle of larger buildings in suburban areas is promoted by the Suburban Design Guide (which inevitably increases the density of development) and in this case, 50% affordable housing is proposed which is a benefit that justifies the design impacts of the proposed height.
Part of the garden will not be wheelchair accessible	The proposal includes 4 wheelchair user dwellings with oversized internal and/or external spaces to compensate for the limited accessibility to the communal garden, which is caused by the slope of the site.
No affordable housing is proposed.	The application originally proposed 8 Shared Ownership homes (20% of units) and now proposes London Affordable Rented affordable homes (50% of units).
Loss of existing buildings	
Three existing period houses will be lost	The existing houses are not subject to any heritage designations.
Neighbour Impacts	
The development will overlook the neighbouring houses	The proposed development would maintain generous overlooking distances of well over 18m between existing and proposed habitable room windows and although the existing houses already overlook each other's gardens, the proposal would avoid directly overlooking the first 10m of the neighbouring gardens.
The shadows created by the development will be will be injurious to the health and well-being of the elderly and vulnerable who live along that side of the road.	The development broadly complies with the Council's guidance of 45 degree lines from habitable rooms, has clearly been designed to avoid harm to neighbour amenity and was accompanied by a sunlight and daylight assessment which demonstrates acceptable impacts.
The development will result in significant noise	New homes are proposed which are consistent with the existing land use. The noise effects will be commensurate with those expected in a residential area and no significant noise generating machinery or plant are proposed.

Design	
The buildings will be high maintenance and local materials including rendered or white painted walls would be more appropriate	The building will use brick elevations and metal balconies, which are high quality materials with lower maintenance than render or painted walls. The high density of the building means that the costs of maintenance will be shared amongst several units.
The proposed grey brick is out of keeping with the other materials on the street (red brick, render and painted elevations)	The design has been amended to use better reflect the local materials, with a darker brick on the ground floor (which is a common feature on Higher Drive), brown brick on the top floor to reflect the dark roof tiles locally and red brick elevations.
The building would be too tall and not supported by the Local Plan; a three-storey building would be acceptable	The local plan does not specify building heights, other than to state that sites should be used efficiently and a minimum of three storeys should be achieved. The proposal would step gradually from 3-5 storeys and would efficiently use the site. Higher Drive has been subject to several planning applications recently and neighbour objections were received to three storey buildings due to their height.
A flat roof is not appropriate	The proposed top storey would be set back and use a darker material, as a contemporary reinterpretation of the surrounding roof treatments.
Ecology and Trees	
The proposal would harm protected species.	An ecology report was submitted which was independently scrutinised by the Council's ecology advisor, who has advised that the development is acceptable subject to the recommended conditions.
The loss of trees is unacceptable	Whilst existing trees contribute to local character, if new housing is to be accommodated, some loss of trees is inevitable and the Council's tree officer has confirmed that the proposed removal of other trees is acceptable, subject to replacement trees and protection measures for the retained trees (including the two TPO trees which are to be protected and retained).
The proposed new trees will block the neighbours' light	The site's surroundings include trees. Native trees are to be secured by planning conditions, which provide shade in summer (when sunlight levels are high) and allow light penetration in winter (when the sun is lower in the sky).
The use of a green site is not appropriate and brownfield sites should be used for new housing	The site is previously developed land and is a brownfield site.

Environmental Health	
The proposal will result in unacceptable air quality	The proposed residential use in itself is not a highly polluting use. That said, an air quality contribution is to be secured within the S.106 Agreement (as standard) alongside a construction and environmental management plan to limit air quality impacts during construction and the provision of electric vehicle charging points.
Highways and Parking	
The proposed cycle storage is pointless due to the hilly surroundings	A scheme for the provision of electric cycles to residents is to be secured in the S.106 Agreement to encourage cycling - notwithstanding the topography.
On-street parking is currently available on Higher Drive and will be reduced by the proposal.	The proposal provides off-street parking spaces, with some overspill parking likely on the street. Higher Drive is unlikely to experience high parking stress and the proposed mitigation and the benefits (in terms of housing delivery and affordable housing) are likely to mitigate and/or outweigh that harm. Higher Drive has relatively low levels of car parking stress and parking restrictions are to be secured by the S.106 Agreement (yellow lining and other related measures) to discourage parking outside the site.
The additional cars will increase pollution and harm the health of children.	Electric vehicle charging points are to be secured to encourage less-polluting vehicles.
The junction between Higher Drive and Highland Road is busy	The proposal is unlikely to directly affect Highland Road
Additional on-street parking may reduce visibility at the junction with Callow Road	Parking restrictions are to be secured stretching 50m on either side of the site which will result in improved visibility.
Higher Drive suffers from highway safety issues with several recent incidents caused by speeding cars, which will be exacerbated by traffic congestion from the proposed development.	The highway safety issues at Higher Drive are pre-existing and not a result of the development, which would re-use existing on-street parking, crossovers in similar positions to existing (with good visibility splays) and would introduce parking restrictions close to the site. The development in itself does not pose highways safety concerns.
Electric vehicle charging should be proposed	20% of spaces are to have active charging points, with the remainder to be designed for future charging points (reflecting the uptake of electric vehicles).
On-street parking will make it difficult for servicing and delivery vehicles to access the site	A servicing and delivery plan is proposed to be secured by a condition.

Flood Risk	
The building will cover existing ground and increase flood risk.	By introducing a five-storey building, the building would more efficiently use the site and allow significant gardens and landscaped areas to remain. Sustainable Urban Drainage is to be secured by a planning condition.
Fire Risk	
The larger building will increase the risk of fire	The building has been designed with brick elevations and access for fire appliances. No objections were raised by the Fire Brigade. Compliance with the Building Regulations will also be required.
Non-material issues	
The developer has previously removed trees	The previous actions of the developer are not material to whether the proposed development is acceptable.
Local property values will be reduced	This is not a material planning consideration.
Infrastructure	
There are insufficient local facilities to support the proposal (including doctors and schools)	The development will make a proportionate contribution to infrastructure through a Community Infrastructure Levy payment and highways contributions.
Procedural issues	
There is no Environmental Impact Assessment.	The development is not Schedule 1 or Schedule 2 development.
Lack of consultation from Croydon Council	The application was publicised in accordance with the Council's Statement of Community Involvement and in excess of the statutory requirements. The minor alterations to the façade were also subject to full re-notification. Given the number of responses received, it is clear that interested parties have been able to make representations.

6.4 Cllr Paul Scott requested Planning Committee consideration (in his capacity as the vice-chair of the Planning Committee) on the grounds of:

- Potential to meet housing need
- Massing and design in relation to character, size and height
- Parking provision
- Affordable housing provision
- Mix of residential units (lack of family sized units)
- Proposed loss of 3 Category B trees

6.5 Cllr Simon Brew raised an objection (and requested Planning Committee consideration) on the grounds of:

- Massing and design in relation to character, size, height and materials
- Local infrastructure requirements
- Neighbour amenity
- Removal of trees
- Parking provision

6.6 Foxley Residents Association has objected on the following grounds:

- Design and character, in particular the proposed height and materials
- Density
- Traffic and highways, in particular parking stress
- Removal of trees and plants

6.7 Woodland Way (Purley) Association has objected on the following grounds:

- Design and character, in particular the proposed height and materials
- Removal of trees and plants
- Traffic and parking

6.8 Purley & Woodcote Residents Association has objected on the following grounds:

- Density and character
- Insufficient parking
- Insufficient affordable housing

Chris Philp MP has objected on the following grounds:

- Design, character and density
- Harm to the amenities of adjacent occupiers including overlooking and loss of privacy
- loss of natural vegetation and natural habitat
- Impacts on infrastructure (parking, healthcare, schools)

7 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 London Plan 2016, 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), updated 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 sufficient supply of homes
- Promoting healthy and safe communities
- Promoting sustainable transport
- Making effective use of land
- Achieving well-designed places
- Meeting the challenge of climate change, flooding and coastal change

7.3 The main policy considerations raised by the application that the Committee are required to consider are:

Consolidated London Plan 2016

- Policy 1.1 Delivering the strategic vision and objectives for London
- Policy 2.1 London in its global, European and United Kingdom context
- Policy 2.2 London and the wider metropolitan area
- Policy 2.3 Growth areas and co-ordination corridors
- Policy 2.6 Outer London: vision and strategy
- Policy 2.7 Outer London: economy
- Policy 2.8 Outer London: transport
- Policy 2.18 Green Infrastructure
- Policy 3.1 Ensuring equal life chances for all
- Policy 3.2 Improving health and addressing health inequalities
- Policy 3.3 Increasing housing supply
- Policy 3.4 Optimising housing potential
- Policy 3.5 Quality and design of housing developments
- Policy 3.6 Children and young people's play and informal recreation facilities
- Policy 3.7 Large residential developments
- Policy 3.8 Housing choice
- Policy 3.9 Mixed and balanced communities
- Policy 3.10 Definition of affordable housing
- Policy 3.11 Affordable housing targets
- Policy 3.12 Negotiating affordable housing on individual private residential and mixed use schemes
- Policy 3.13 Affordable housing thresholds
- Policy 3.15 Co-ordination of housing development and investment
- Policy 4.12 Improving opportunities for all
- Policy 5.1 Climate change mitigation
- Policy 5.2 Minimising emissions
- Policy 5.3 Sustainable design & construction
- Policy 5.7 Renewable energy
- Policy 5.8 Innovative energy technologies
- Policy 5.9 Overheating and cooling
- Policy 5.10 Urban greening
- Policy 5.11 Green roofs and development site environs
- Policy 5.12 Flood risk management
- Policy 5.13 Sustainable drainage
- Policy 5.14 Water quality and wastewater infrastructure
- Policy 5.15 Water use and supplies
- Policy 5.16 Waste net self-sufficiency
- Policy 5.17 Waste capacity

- Policy 5.18 Construction, excavation and demolition waste
- Policy 5.21 Contaminated land
- Policy 6.1 Strategic approach
- Policy 6.2 Providing public transport capacity and safeguarding land for transport
- Policy 6.3 Assessing effects of development on transport capacity
- Policy 6.4 Enhancing connectivity
- Policy 6.5 Funding Crossrail and other strategically important transport infrastructure
- Policy 6.7 Better streets and surface transport
- Policy 6.9 Cycling
- Policy 6.10 Walking
- Policy 6.11 Smoothing traffic flow and tackling congestion
- Policy 6.12 Road network capacity
- Policy 6.13 Parking
- Policy 7.1 Lifetime neighbourhoods
- Policy 7.2 An inclusive environment
- Policy 7.3 Designing out crime
- Policy 7.4 Local character
- Policy 7.5 Public realm
- Policy 7.6 Architecture
- Policy 7.13 Safety, security and resilience to emergency
- Policy 7.14 Improving air quality
- Policy 7.15 Reducing noise and enhancing soundscapes
- Policy 7.19 Biodiversity and access to nature
- Policy 7.21 Trees and woodlands
- Policy 8.1 Implementation
- Policy 8.2 Planning obligations
- Policy 8.3 Community infrastructure levy

Croydon Local Plan 2018

- Policy SP1: The Places of Croydon
- 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
- Policy DM1: Housing choice for sustainable communities
- Policy DM10: Design and character
- Policy DM13: Refuse and recycling
- Policy DM14: Public Art
- Policy DM16: Promoting Healthy Communities
- Policy DM23: Development and construction
- Policy DM24: Land contamination
- 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 DM30: Car and cycle parking in new development
- Policy DM42: Purley

Supplementary Planning Guidance/Documents:

- Croydon Suburban Design Guide (Croydon Council, 2019)
- Housing SPG (Mayor of London, 2016)
- Accessible London: Achieving an Inclusive Environment SPG (Mayor of London, 2014)
- Play and Informal Recreation SPG (Mayor of London, 2012)
- Character and Context SPG (Mayor of London, 2014)
- Sustainable Design and Construction SPG (Mayor of London, 2014)
- National Design Guide (2019)
- Affordable Housing & Viability (Mayor of London, 2017)
- Crossrail Funding (Mayor of London, 2016)

8 MATERIAL PLANNING CONSIDERATIONS

8.1 The main planning issues raised by the application that the committee must consider are:

- Principle of development
- Housing tenure, mix and density
- Townscape and visual impact
- Housing quality for future occupiers
- Impacts on neighbours
- Highways, access and parking
- Environment, flooding and sustainability
- Trees and ecology
- Other matters

Principle of Development

- 8.2 The London Plan and Croydon Local Plan support the delivery of new housing in sustainable locations, to address the need for new housing to suit local communities. The London Plan sets a minimum ten-year target for the borough of 14,348 new homes (over the period of 2015-2025). The Local Plan sets a minimum twenty-year target of 32,890 new homes (over the period of 2016 to 2036) although the actual need identified by the Croydon Strategic Housing Market Assessment is an additional 44,149 new homes by 2036; the policy target will need to be substantially exceeded to meet the actual identified need. The Local Plan's spatial strategy separates this target into three sub targets with 10,760 new homes to be delivered within the Croydon Opportunity Area, 6,970 new homes on other allocated sites, and 10,060 homes delivered across the borough on windfall sites.
- 8.3 Windfall schemes which provide intensification of existing residential areas therefore play a crucial role in meeting the need for new homes. The proposed development would create a significant net increase in new homes and would make a contribution to the borough achieving its housing targets.
- 8.4 Policy SP2.2 of the Croydon Local Plan promotes increased housing choice and in particular, requires that land is used efficiently. To achieve efficient use of land Policy DM10.1 seeks to achieve a minimum height of 3 storeys for all new buildings and the

Suburban Design Guide promotes 4 storey buildings on streets of predominantly 2-storey detached houses.

- 8.5 The proposed development is a 3-5 storey residential development, which would provide 40 new homes. The site is in a residential location and is suitable for additional windfall housing. The principle of residential intensification is acceptable, subject to the land being efficiently used and policy compliance in other respects.

Housing Tenure, Mix and Density

- 8.6 Policy SP2.4 requires the delivery of affordable homes, with a target of 50% on major housing developments.
- 8.7 A viability appraisal was originally submitted with the application and assessed independently by Adams Integra who confirmed that the applicant's initial affordable housing offer of 20% of homes as 1-bedroom shared ownership would be the maximum viable amount of affordable housing.
- 8.8 Since the viability appraisal was carried out, the applicant has engaged with Moat Housing Association and has undertaken to increase the amount of affordable housing to 50% of homes as London Affordable Rent. 20 of the proposed 40 homes (50%) would be affordable in line with the policy target.
- 8.9 Within that 50% policy target, the Local Plan's aspiration is for at least 60% of affordable homes to be affordable rented accommodation (a low cost rented product supported by the Mayor of London based on social rent levels) with the remainder being intermediate homes. In this case, all of the affordable homes would be secured as London Affordable Rent which exceeds the minimum requirement, is supported by Moat (the Registered Provider) and will result in the delivery of a significant number of homes which are genuinely affordable to people on low incomes.
- 8.10 50% of homes would therefore be secured as London Affordable Rented homes in the S.106 Agreement, which represents a weighty consideration in the balance of other planning considerations.
- 8.11 Given that the surrounding homes on Higher Drive are generally open market housing, the introduction of a significant number of genuinely affordable homes in this location would result in a good mix of tenures locally and is a benefit in excess of the minimum policy requirement. Substantial weight is therefore placed by officers on the benefits arising from the proposal's delivery of London Affordable Rent homes.
- 8.12 Policy SP2.7 supports the provision of a mix of new homes, including new family sized dwellings and Policy DM1.2 supports this aim by preventing the loss of small family homes (homes below 130 sq m of existing accommodation or homes which originally had three bedrooms) The proposed development would result in the demolition of 3 family sized homes and replacement with 4x3 bedroom homes which means that there would be no net loss of family sized homes.
- 8.13 Table 4.1 of the Croydon Local Plan sets out the expected minimum percentage of three bedroom or larger homes which should be provided (in this case 70%). For the first three years of the Local Plan, Policy DM1.1 allows an element of 3 bedroom homes to be substituted by 2 bedroom (4 person) homes if it has been demonstrated that the required quantum of 3 bedroom homes would not be viable.

- 8.14 10% of homes (4 homes) would have 3 bedrooms and 60% (24 homes) would be family sized homes provided as either 3-bedroom flats or 2-bedroom 4-person flats. Although the proposed unit mix would fall slightly short of the 70% target, the mix has been agreed with Moat and would therefore broadly comply with Policy DM1.1 (which allows an alternative tenure mix if agreed with the Registered Provider).
- 8.15 Policy SP2.2 of the Croydon Local Plan promotes increased housing choice and requires that land is used efficiently. Policy 3.4 of the London Plan states that development should optimise housing output and in Table 3.2 provides an indicative density matrix (along with supporting text stating that it is not appropriate to apply Table 3.2 mechanistically).
- 8.16 40 homes would be provided (with 115 habitable rooms) which would result in a density (across the site's area of a 0.28ha) of 143u/ha or 410hr/ha. Given the site's PTAL of 1a/1b and its suburban setting, the density matrix suggests an indicative density of 75 u/ha or 150-200 hr/ha. The proposal would provide approximately double the density set out in the matrix and would clearly optimise housing output and make efficient use of land in line with the Croydon Local Plan and the London Plan.
- 8.17 Rather than applying the density matrix mechanistically, paragraphs 1.3.50-52 of the Housing SPG explain that for schemes which exceed the ranges in the density matrix it is important that qualitative concerns are suitably addressed. In particular, those schemes must achieve high quality design in terms of liveability, residential quality, housing standards, residential mix and dwelling types, refuse and recycling and cycle parking. Where these considerations are satisfactorily addressed, the London Plan provides sufficient flexibility for such higher density schemes to be supported.
- 8.18 Overall, the proposed development would accord with the Local Plan's strategy to accommodate new homes in residential areas and it would provide a significant increase in much needed affordable homes. The development is therefore (on balance) acceptable in principle subject to policy considerations covering other elements, with officers placing substantial weight on the benefits associated with the proposed affordable homes.

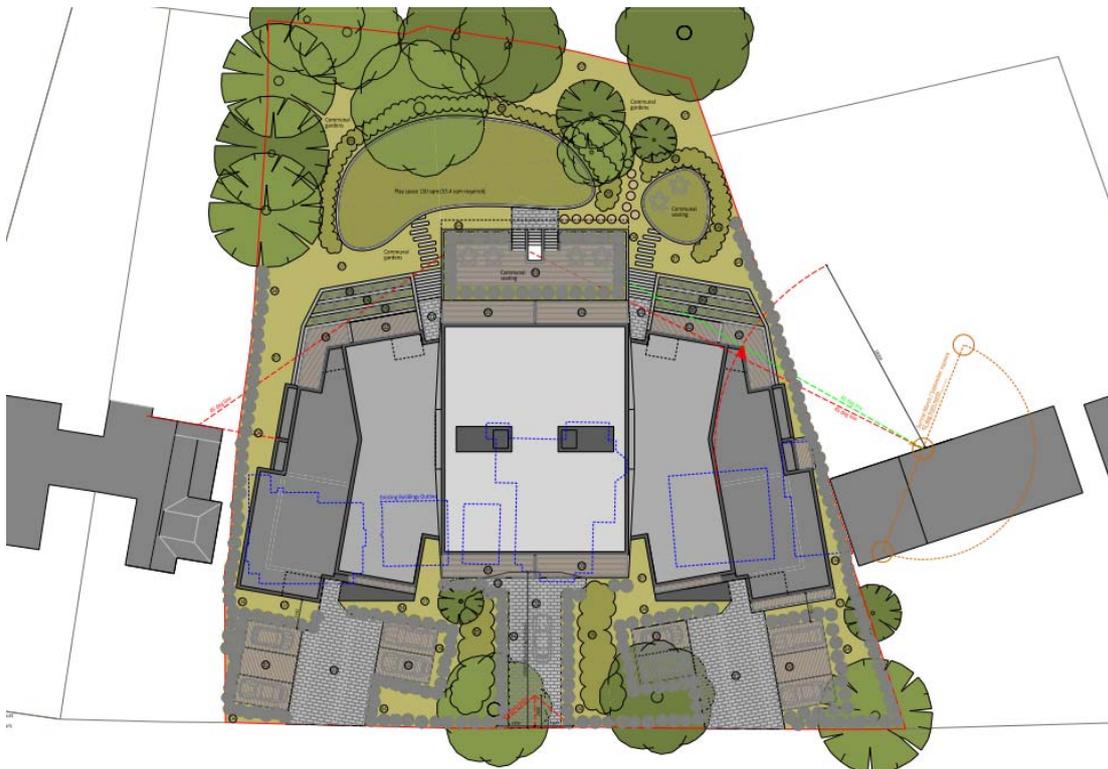
Townscape and Visual Impact

- 8.19 London Plan Policy 3.4 seeks to optimise housing output, taking into account local character and Policies 7.4 and 7.6 require high quality architecture which contributes to the local architectural character. Policies SP2.2 and DM10.1 of the Local Plan require that land is used efficiently and seek to achieve a minimum height of 3 storeys for all new buildings. New development is required to respect the development pattern, layout and siting; scale, height, massing and density; and the appearance, existing materials and built and natural features of the surrounding area; the Place of Croydon in which it is located.

The Suburban Design Guide is intended to apply to developments of 25 or fewer homes, but is relevant to all suburban development. It sets out how new developments which introduce higher densities on suburban sites can draw on their local context to ensure the local character evolves in a co-ordinated and sensitive way.

Layout

- 8.20 Higher Drive is laid out predominantly as detached houses, with some small blocks of flats either recently built or consented. The buildings on and around the site are mostly two storey detached houses under pitched roofs.
- 8.21 The proposed development would provide a single building across the site's frontage. The building would be deeper than the surrounding houses and would follow the 45 degree horizontal guidelines set out in the SDG to efficiently use the site without unacceptably harming the amenities of the surrounding buildings. The SDG is intended to be used for smaller developments (up to 25 homes) and the adherence to the 45 degree guidance alongside the size of the proposed building would result in a very deep building which would have a very different appearance to the surrounding buildings.



Proposed Site Plan

- 8.22 The building would be laid out with stepped elevations, treated so as to have the appearance of three blocks when viewed from the street – with two cores; one accessed from each of the outer blocks and with a vehicle entrance in the central block. The entrances would be positioned centrally as part of the elevations, with good legibility from the street. Therefore, whilst the building would be larger than its neighbours, its layout would have some resonance with the existing development pattern found within the street.
- 8.23 The building would be set back from the street behind landscaping and parking spaces; the layout of the front driveways and landscaping would reflect the surrounding site layouts. There would be 10 parking spaces located to the front of the site (in small clusters of up to 3 adjoining spaces, broadly reflecting the sizes of the surrounding driveways) and 14 provided inside the building. There would be substantial areas of

soft landscaping to the front of the building, including new and retained trees, which would reflect the verdant nature of the front gardens found in the street.

8.24 There would be a communal garden to the rear with play-space and trees, which would be overlooked by the new homes.

8.25 Overall, the proposed building's footprint would be much larger than those found within the area, but the overall site layout would benefit from substantial landscaping and the appearance of three joined blocks would echo the way in which buildings are currently laid out along the street.

Height, Scale and Massing



Proposed Front Elevation



Proposed Front Elevation (Left Hand Side)

8.26 Policies SP2.2 and DM10.1 of the Local Plan require that land is used efficiently and seek to achieve a minimum height of 3 storeys for all new buildings. New development should respect the development pattern, layout and siting; scale, height, massing and density; the appearance, existing materials and built and natural features of the surrounding area; and the Place of Croydon in which it is located. It is important that developments draw on their local context to evolve the local character in a way which efficiently uses land. Section 2.10 (Heights) of the SDG explains how additional storeys can be introduced to existing residential streets and generally advocates new buildings being a storey higher than the surrounding buildings.

- 8.27 As noted above, the proposed building would be arranged to appear as three blocks. The massing when viewed from the street would clearly reference the plot widths within the street, with each of the three “block elements” having varied materials and detailing drawn from a simple brick palette.
- 8.28 The outer blocks would be three full storeys high, each with an additional set back storey of accommodation. That massing would efficiently use the land whilst also respecting the scale of the adjacent buildings (2 storeys plus roofs). They would each be effectively a storey higher than their neighbours.
- 8.29 The central block would be larger at four storeys with an additional set back storey of accommodation, resulting in five storeys overall. Although this element would be significantly taller than the other buildings within Higher Drive, it would only be one storey taller than the outer blocks. The ground floor would feature a central car park entrance, flanked by bin stores, with the effect that the central focus of that block would be the car park entrance. The use of dark brickwork to integrate the car park entrance into the building’s fabric, landscaping and well-designed pedestrian entrances in the outer block would assist in mitigating the visual impact of the car park entrance. The top storey would use a darker brick and would be set back to appear recessive.

Detailed Design and Materials

- 8.30 The three “blocks” would utilise unified brickwork, central entrances and recessed balconies to reflect the modelling of the surrounding buildings, providing legible and clearly defined entrances and high-quality design.
- 8.31 The central car park entrance would mean that the majority of parked vehicles would be screened from view – contained within the building. The lower floor of the central “block” has been refined with dark brick elevations to integrate the parking entrance into the building’s materiality and there would be substantial areas of soft landscaping to the front of the central block which should avoid the car parking entrance appear overly dominant. Furthermore, the entrances to the outer “blocks” have been designed to be legible from the street and centralised within their respective “block element” and would act as focal points to draw attention away from the car park entrance.



Bay studies showing varied brickwork colours and textures

- 8.32 The three blocks would all use slightly different materials and detailing, to enhance the impression of the three constituent parts. Details have been provided as part of the planning application to indicate how high quality materials could be used and a planning condition is recommended requiring the approval of brick sample panels (to be maintained on site to ensure compliance). At the upper floors, the elevations would be simple with inset balconies, textured brickwork and a horizontal emphasis. The balconies would be recessed with well detailed parapets, textured brick and well-proportioned windows and doors.
- 8.33 Whilst the horizontal emphasis of the upper floors on the central block would not entirely reflect the smaller scale features on the surrounding buildings, the use of inset balconies and textured brick should introduce some depth to the frontage and subject to the recommended planning conditions the materials and design detailing should be of a high quality.
- 8.34 At the rear of the building, the façade would be relatively complex, although the various windows and balconies would relate well to each-other resulting in a relatively tidy appearance. The materials and the proportions of the design features utilised to the rear would follow those on the front elevation and given that the rear elevation would only be visible from private views, it would not be harmful to the street scene.
- 8.35 The side elevations would be highly visible from the street given their height and depth. The use of contrasting materials for the top storeys and the simple side elevation fenestration, would help deliver a more cohesive appearance.

Design Summary

- 8.36 Overall, officers acknowledge that the building would be large for its setting and will represent change to the site's existing setting. Although the massing would push the boundaries of acceptability in view of the immediate site context, it would optimise the use of land and would realise the delivery of 40 new homes (60% of which would be family sized homes) which clearly could not be provided in a smaller building or a group of smaller detached buildings. The proposal would have a relationship with its setting, with the massing broken into blocks reflecting the existing and surrounding site layouts; the front garden, parking areas and planting designed to reflect the existing front garden layouts and materials which pick up on the colours and textures on Higher Drive. The proposed building can therefore be considered an acceptable design which optimises the efficient use of land.

Housing Quality for Future Occupiers

- 8.37 All the proposed units would comply with internal dimensions required by the Nationally Described Space Standards and would provide sensible layouts with well-proportioned rooms, storage space and access to private outdoor spaces (gardens, terraces and/or balconies) directly from their living rooms. As described above, the building would have attractive and well laid out entrances within the outer "blocks" and although the internal corridors would be relatively long, there would be fewer than 8 units per core on each floor in line with the London Housing SPG. There would be no single aspect north facing units and all units would have windows on at least two elevations (although some of those would face inset balconies).
- 8.38 The proposed homes have been designed to avoid excessively long rooms and those with longer kitchen/dining/living rooms would have secondary (obscured glazed) side

elevations to achieve good levels of daylight. A daylight analysis has been submitted which has demonstrated that the proposed homes would comply with the BRE guidelines for daylighting in new homes.

- 8.39 The quality of accommodation would therefore be acceptable and proposed homes would provide their future residents with adequate living conditions.
- 8.40 As regards external amenity space, the London Housing SPG states that a minimum of 5 sq m of private outdoor space should be provided for 1-2 person dwellings and an extra 1 sq m for each additional unit. Each flat would benefit from private amenity space which would comply with (or in some cases exceed) these minimum private open space requirements.
- 8.41 In addition to private amenity spaces, there would be communal gardens and play-space to the rear. There would be corridors through the building at lower ground (entrance) level giving direct access for residents to the garden and it would be well overlooked by residents providing a safe and attractive space.
- 8.42 There would be a large amount of good quality communal open space across the site, offering a variety of spaces for residents (including play-space). Based on 50% of homes being London Affordable Rent, the amount of play-space required by Croydon Local Plan (and the London Mayors Play and Informal Recreation SPG) would be 176.7sqm which would be included in the communal garden.
- 8.43 The proposed building would incorporate a lift which is welcomed by officers. In order to comply with the London Plan requirement that 10% of units would be wheelchair accessible or adaptable and as all other flats would have level access (some via the lift) a condition is recommended requiring four ground floor flats to internally comply with Building Regulations Part M4(3) (wheelchair user) and all other units to be M4(2) compliant (accessible and adaptable). Due to the slope of the land, the rear garden would not be wheelchair accessible. In mitigation, the 4 wheelchair user dwellings would all exceed the minimum accommodation standards. Compared to the minimum standards, 2 of these units (Units 3 and 6) would have 10 sq m additional internal space and 7 sq m additional external space; the other 2 (Units 1 and 8) would have 16 sq m additional internal space and 2 sq m additional external space. Given the site's challenged topography, it would not be possible to provide a development with level access throughout the communal spaces so on balance, the accessible design is considered acceptable. Each wheelchair user dwelling would also be allocated a blue badge parking space.
- 8.44 The development would provide acceptable accommodation including family sized housing all with adequate layouts, space and amenities for future occupiers.

Impacts on Neighbours

- 8.45 The site is surrounded by residential properties to the north, east and south. To the west of the site is Higher Drive itself and on the opposite side of the road are the rear gardens of the houses fronting onto on Callow Field (which are set lower down the hill).

Daylight and Sunlight

- 8.46 The building's footprint and layout has been designed in line with the 45 degree guidance set out in the SDG. Although that guidance is primarily intended for smaller developments (up to 25 homes) it is still relevant.

- 8.47 The development would fall outside the 45-degree line horizontally and vertically from the nearest front and rear elevation windows at 57 Higher Drive. The development would slightly clip the 45-degree horizontal line from the nearest rear elevation window at 65 Higher Drive, albeit at a distance of 17.3m to the north of that window.
- 8.48 Notwithstanding the adherence to the 45-degree guidelines, a daylight and sunlight assessment was undertaken in accordance with the BRE guidelines which demonstrates that all affected habitable room windows at 57 and 65 Higher Drive would fully comply with the BRE guidelines.

Privacy and Outlook

- 8.49 The windows contained within the front elevation would overlook Higher Drive and would be more than 30 metres from the closest windows of homes on Callow Field to the west. The windows contained within the rear elevation would face rearwards (east) and would be more than 50m from the nearest windows to the rear at Woodland Way. The windows on the side elevations would not look directly into any side elevation windows at the adjacent houses at 57 and 65 Higher Drive. Overall the proposal would not result in unacceptable overlooking to residential windows.
- 8.50 In addition to residential windows, Croydon Local Plan Policy DM10.6 requires proposals to avoid direct overlooking of private outdoor spaces (within 10m perpendicular to the rear elevation of a dwelling). The distance from the front elevation windows to the relevant garden spaces at Callow Field would be well over 18m and would therefore avoid "direct overlooking." Similarly, the windows on the side and rear elevations of the proposed buildings would overlook the rearmost portions of the gardens at 57 Higher Drive, 65 Higher Drive and the houses to the rear on Woodland Way but would not directly overlook the first 10m of the nearest gardens due to their orientation and distances (over 18m). The proposal would therefore avoid unacceptable overlooking impacts and would maintain acceptable privacy for the neighbouring houses on all sides.

Noise and Disturbance

- 8.51 The proposed development is likely to generate additional comings and goings to/ from the site. However, the additional noise levels associated with this are not anticipated to be beyond what would be expected within residential areas.

Highways, Access and Parking

- 8.52 The site has a PTAL of 1a/1b which reflects its very limited public transport accessibility. It is approximately 15 minutes' walk (1.1km) to Purley District Centre and Purley Rail Station with services to several employment centres, airports and Central London. It is approximately 13 minutes' (0.9km) walk of Reedham station and neighbourhood centre. Whilst there are buses on Old Lodge Lane and Beaumont Road, both within 8 minutes' walk (0.7km), there is no bus service along Higher Drive or within the 400 metres of the site which is the maximum distance guidance that TfL recommends for planning bus services in residential areas.
- 8.53 Closer to the site, there are also scattered amenities (such as St Barnabus Church and several local schools).
- 8.54 Higher Drive is a steep road and although the site is relatively close to local facilities, the routes from both Purley and Reedham are uphill which makes journeys on foot

(including with a pram), by wheelchair or cycle less attractive. Nonetheless, Higher Drive is a residential street where people currently choose to live and there is access to local facilities on foot which means that for some residents, it would be feasible to live at the site without being wholly dependent on private car use (for example regular commuting or walking to the local schools).

- 8.55 That said, there will be residents living at the site who will rely on private car use and it is important that measures are taken to manage use of the private car and to ensure that those cars do not result in unacceptable impacts when parked.
- 8.56 The London Plan sets out maximum car parking standards for residential developments based on public transport accessibility levels and local character. In Outer London areas with low PTAL (generally PTALS 0-1), boroughs should consider higher levels of provision. The SDG suggests that in PTALs of 0-1, the Council will seek to accommodate all parking on site.
- 8.57 For market housing, a 1:1 ratio would be in line with the London Plan and the Croydon Local Plan – in reducing the reliance on the private car and to meet more general sustainability targets. For affordable housing, the Croydon Local Plan accepts two-thirds car parking provision. For the proposed scheme, with up to 20 market homes (requiring 20 spaces) and 20 affordable homes (requiring 13 spaces) approximately 33 spaces should be provided.
- 8.58 The proposed development includes 24 parking spaces (which is also the number of “family sized” units). 10 of those would be in the forecourt (in clusters of 2-3 spaces) and 14 would be within the under-croft parking area – leading to a potential shortfall of 9 off street car parking spaces.
- 8.59 In order to demonstrate the impact of the development on on-street parking stress, a transport assessment and parking stress survey was submitted in line with the established Lambeth Methodology. There are no houses opposite the site (as the houses to the west front onto Callow Field rather than onto Higher Drive) meaning there is space for cars to park directly outside the site (on one side of the road). The existing overnight parking stress is 13%, with 108 on-street spaces available within a 200m walking distance, which would easily accommodate the shortfall of approximately 9 spaces. Consequently, whilst there would be a shortfall of on-site car parking provision, the development would not result in unacceptably high parking stress.
- 8.60 The site is near to St Barnabus Church, which attracts visitors for events (including Sunday church services) causing spikes in parking stress. The effect of the development on parking stress during these events would be temporary and would not justify a refusal of planning permission.
- 8.61 Increased parking stress is not the only effect of on-street parking. Parked cars on both sides of the street can make it more difficult for emergency services, delivery vehicles and cyclists. On street car parking can also make it more difficult to accommodate future infrastructure improvements (for example a potential bus service on Higher Drive). To ensure that road safety and traffic flow is not negatively impacted upon - by parking overspill from the development, additional parking restrictions should be introduced on Higher Drive in the vicinity of the site (secured through the s.106 Agreement).

8.62 In order to discourage car parking and car use and to reduce the parking stress, it is recommended that the following measures are secured through the S.106 Agreement process:

- A financial contribution of £5,000 towards the implementation of parking restrictions on Higher Drive - 50 metres either side of the site and the implementation of a Traffic Management Order.
- A financial contribution of £5,000 towards a network of car clubs in the Purley area.
- A cycle voucher scheme to encourage the purchase and use of electric cycles (given the undulating nature of the surroundings) amounting to the availability of a £500 e-bike voucher for each home (which will cover the full cost of a basic electric bike).
- A £12,000 contribution towards a feasibility study to further develop proposals with TfL to introduce a bus route along Higher Drive including a bus stop within 400 metres of the site.

8.63 The above measures are considered sufficient to help discourage car use, encourage use of more sustainable transport modes and mitigate against the shortfall of on-site car parking. However, given the shortfall of parking spaces, a parking management plan should be secured by way of a planning condition.

8.64 The proposed access to the site would utilise three crossovers (replacing the existing three crossovers) with visibility splays to be secured by a planning condition (in addition to the parking restriction which will avoid parked cars obscuring the visibility splays). The access points onto the site would be acceptable.

8.65 The applicant would be required to enter into S.278 agreement with Highways Development Team to install new vehicle crossovers and resurface any damaged footway along the front boundary of the site, which would also be managed through the use of a planning condition.

8.66 Four disabled parking spaces are proposed in suitable locations near to the lift (10% of spaces, in line with policy requirements).

8.67 A condition is recommended requiring all spaces to enable future provision of electric charging points and 16 of the parking bays (20%) to have an active electric vehicle charging point.

8.68 This section of Higher Drive has a known history of road collisions and issues with speeding vehicles. The proposed development has no bearing on existing traffic conditions – and traffic speeds are best managed through other means – and the existing highway condition does not mean that people should no longer live on Higher Drive. Subject to the measures identified above, no significant highway safety concerns are raised.

8.69 Seventy-six secure, accessible and sheltered cycle storage spaces would be able to be accommodated within the proposed cycle store within the lower ground floor car park area, in line with the London Plan standards (which require 71 spaces).

8.70 Refuse and recycling storage is proposed within the lower ground floor, within 30 metres of the residential entrances and within 20 metres of the highway for accessible collection. The proposed bin store is capable of accommodating the required minimum

capacity for the proposed development (5,120 litres dry recycling, 5,550 litres landfill, and 384 litres food recycling). Details of the store, including the materials and appearance will be secured by a condition including storage for bulky goods.

- 8.71 The site layout would be capable of accommodating all construction vehicles on site for the duration of the construction process. A Construction Logistics Plan Scoping Note was submitted with the application, which was reviewed by the Council's Highways Engineer and a full CLP will be required by planning condition before commencement of work.
- 8.72 Deliveries and servicing would take place from the street, reflecting the existing arrangements.
- 8.73 All residential units would be within 40m of the street and therefore accessible by a fire appliance parked on the street (and in practice a fire appliance may park on the site bringing the distance down by a further 10m).

Environment, Flooding and Sustainability

- 8.74 The site is located within Flood Risk Zone 1 and is at very low risk of surface water flooding.
- 8.75 The applicant has submitted a Flood Risk Assessment which confirms that a Sustainable Urban Drainage System (SUDS) would utilise infiltration drainage; this is to be secured by a pre-commencement planning condition. A condition will also be attached to ensure that the proposal is designed to achieve mains water consumption of 110 litres or less per head per day.
- 8.76 Croydon Local Plan Policy SP6.2 requires new development to minimise carbon dioxide emissions, including that new dwellings (in major development proposals) must be zero carbon. As a minimum a 35% reduction in regulated carbon emissions over Part L 2013 is required, with the remaining CO₂ emissions to be offset through a financial contribution. Policy SP6.3 requires a high standard of sustainable design and construction.
- 8.77 The scheme is expected to achieve at least a 35% reduction in regulated carbon emissions. The building fabric would use good levels of insulation, low air permeability, heat recovery ventilation and efficient boilers to achieve low energy use. A further 15% of carbon emissions will be achieved through the use of PV panels. As those panels are not shown on the proposed plans (but there would be a roof parapet which would provide some screening) details are required by a condition to ensure they would achieve the required emission savings without visual harm.
- 8.78 The remaining regulated CO₂ emissions shortfall would be covered by a carbon offset payment of which would be secured through the S.106 Agreement (approximately £47,016, with the amount recalculated following construction).
- 8.79 The Council's environmental health officer has reviewed the application and offered no objection subject to a Construction Logistics Plan in line with best practice; a contaminated land assessment, a delivery and servicing plan, noise limits, low emissions boilers (all of which are to be secured by planning conditions) and a financial contribution of £4,000 to mitigate air quality impacts (to be secured in the S.106 Agreement).

Trees and Ecology

- 8.80 The site comprises existing houses and residential gardens and although there is a significant proportion of green space, no particular biodiversity benefits, protected species or habitats have been identified.
- 8.81 The site is subject to a Tree Protection Order which protects trees T1 (a Beech tree) and T3 (an Oak tree). These protected trees would be retained. The removal of 4 trees is proposed (3 Category B: T18, T19 which are Cypress trees and T22 which is a Yew tree; and 1 Category C: T2 which is a Yew tree). The Council's tree officer has accepted the loss of those trees, subject to replacement planting. Tree protection measures are also to be secured by a planning condition that will avoid negative impacts on retained trees due to construction activity.
- 8.82 An ecology survey was submitted and reviewed by the Council's advisor who raised no concerns, subject to the recommended conditions. That said, the grant of planning permission does not override other legislation protecting specific habitats or species and an informative is recommended to advise the applicant to see the standing advice by Natural England in the event that protected species are found on site.
- 8.83 A landscaping plan is also recommended to ensure appropriate biodiversity benefits and to integrate the scheme into its verdant setting, including a suitable proportion of mature planting to the front to soften the visual impact of the development and to provide some screening to the parking areas and bin store entrances.

Other Matters

- 8.84 The development will be liable for a Community Infrastructure Levy (CIL) payment. CIL payments are pooled from developments and contribute to delivering infrastructure to support the development of the area, such as local schools.
- 8.85 The proposal was considered by the Metropolitan Police Service's Designing out Crime Officer who raised no objections. In order to ensure a safe, inclusive and accessible development where crime and disorder and the fear of crime do not undermine the quality of life, Secured by Design accreditation is recommended to be secured by a planning condition.
- 8.86 Croydon Local Plan Policy DM14 requires the inclusion of public art, which is to be secured by a planning condition.
- 8.87 The site is in residential use and the land is unlikely to be contaminated. A desktop study was submitted with the application. A stage 1 contamination report including an asbestos survey and intrusive investigation is recommended by a condition, along with remedial works in the event that contamination is found to be present during the construction phase, to ensure a safe environment for future residents.
- 8.88 The site is in an Air Quality Management Area (AQMA), although it is not on a main road or near particularly polluting uses. A contribution of £4,000 towards air quality improvements to mitigate against non-road transport emissions will be secured via the S.106 Agreement.
- 8.89 A health impact assessment screening was submitted which identified that the proposal would improve housing quality, with suitable access to health, social and retail facilities, open space and would be environmentally sustainable.

- 8.90 To avoid excessive light pollution, a condition is recommended requiring details of external lighting, including details of how it would minimise light pollution.
- 8.91 In order to ensure that the benefits of the proposed development (including those required to mitigate the harm caused) reach local residents who may be impacted indirectly or directly by the proposal's impacts, a skills, training and employment strategy (and construction phase) and a contribution towards training are to be secured by S.106 obligations.

Conclusions

- 8.92 The site is in a sustainable location for new housing development and the scale, size and amount of development would result in efficient use of land and the delivery of much needed affordable housing. The new dwellings would provide a good quality and appropriate mix of family sized housing types, supported by communal gardens, cycle storage and bin storage. Although there would be a shortfall in car parking, the site is within walking distance of commuter links and mitigation is proposed through the S.106 Agreement to discourage car use in favour of more sustainable modes of transport. The impacts to neighbours would be largely limited to the construction period and the further potential impacts highlighted in this report would be mitigated by the recommended planning conditions.
- 8.93 The proposal would broadly comply with the aims of the Croydon Local Plan 2018 and would result in benefits arising from the provision of at least 20 London Affordable Rent homes. Although officers acknowledge that the quantum of development would result in a larger building than would normally be supported and a shortfall of car parking, these concerns are proposed to be mitigated through the recommended conditions and S.106 Agreement and any harm caused would be outweighed by the benefits of the proposed housing, including the delivery of a significant level of affordable housing. Officers therefore consider (on balance) that the scheme would accord with the aims of the development plan (taken as a whole) and would be acceptable.
- 8.94 All other relevant policies and considerations, including equalities and the public consultation responses, have been taken into account.
- 8.95 It is recommended that planning permission is granted in line with the officer recommendation for the reasons summarised in this report.