

PART 6: Planning Applications for Decision

Item 6.2

1 APPLICATION DETAILS

Ref: 21/06145/FUL
 Location: 2 Beech Avenue, South Croydon CR2 0NL
 Ward: Sanderstead
 Description: Demolition of existing building and erection of 2 x 4-storey buildings comprising 31 residential units plus 29 car parking spaces and associated landscaping.
 Drawing Nos: 22.3367.100-P7; 101-P7; 103-P4; 103-P3; 104-P10; 105-P9; 106-P9; 107-P9; 108-P2; 109-P4; 110-P2; 111-P2.
 Applicant: Ms Caroline Botsford
 Agent: Jake Russell, CPC Planning Consultants
 Case Officer: Yvette Ralston

	Housing Mix					
	1b2p	2b3p	2b4p	3b4p	Larger	TOTAL
Existing					1	1
Proposed (market housing)	0	3	2	20		25
Proposed (affordable housing)	2	3		1		6

Vehicle and Cycle Parking (London Plan Standards)	
PTAL: 2 (bespoke PTAL calculation agreed)	
Car Parking maximum standard	Proposed
29	29 including 1 x car club space
Long Stay Cycle Storage minimum	Proposed
61	65
Short Stay Cycle Storage minimum	Proposed
2	4

1.1 This application is being reported to committee because:

- Objections above the threshold in the Committee Consideration Criteria have been received

2 RECOMMENDATION

2.1 That the Committee resolve to GRANT planning permission

2.2 That the Director of Planning and Sustainable Regeneration is delegated authority to issue the planning permission subject to:

The prior completion of a legal agreement to secure the following planning obligations:

- a) Provision of 6 x First Homes on site (19% by unit / 15% by habitable room)
- b) Provision of an on-site car club bay. Developer responsible for set-up costs and membership fees for residents.
- c) Sustainable Transport contributions of £31,500 (£1,500 per unit minus £15K for the on-site car club space)
- d) Submission of a Travel Plan
- e) Air Quality Contribution of £3,100
- f) Carbon Offsetting Contribution of £23,940
- g) 'Be Seen' post-occupancy reporting of energy performance to the GLA
- h) Local employment and training (construction phase) contribution of £15,000 (£2,500 per £1m of capital construction costs) plus Local Employment and Training Strategy
- b) Any other planning obligation(s) considered necessary by the Director of Planning and Sustainable Regeneration

2.3 That the Director of Planning and Sustainable Regeneration is delegated authority to negotiate the legal agreement indicated above.

2.4 That the Director of Planning and Sustainable Regeneration is delegated authority to issue the planning permission and impose conditions and informatives to secure the following matters:

Conditions

- 1) Commencement time limit of 3 years
- 2) Carried out in accordance with the approved drawings

Pre-commencement (including demolition)

- 3) Submission of Construction Management Plan
- 4) Construction Environmental Management Plan for Biodiversity (CEMP)
- 5) Submission of bat licence from Natural England
- 6) Submission of updated Fire Statement (reflecting the drawings which have already been updated)
- 7) Submission of results of intrusive site investigation for contaminated land and a risk assessment and remediation strategy if required

Prior to above ground floor slab level

- 8) Submission of materials/details
- 9) Submission of Biodiversity Enhancement Strategy
- 10) Submission of final SUDS details
- 11) Submission of Piling Method Statement

Pre-occupation

- 12) Submission of final cycle and refuse storage details
- 13) Submission of final details of landscaping, communal outside space and play space including a landscape management plan
- 14) Submission of details of Secure by Design accreditation
- 15) Submission of lighting details for biodiversity and to avoid nuisance to neighbours

Compliance

- 16) In accordance with ecological appraisal recommendations including the PEA, Bat Survey and Reptile Survey
- 17) In accordance with Arboricultural Impact Assessment, Method Statement and Tree Protection Plan
- 18) Car parking in accordance with plans, inclusion of EVCPs and no boundary treatments above 0.6m in sightlines
- 19) Delivery of 3 x M4(3) units and the remainder to be M4(2) accessible units.
- 20) Compliance with energy and water efficiency requirements
- 21) Compliance with recommendations of the Air Quality Assessment
- 22) Noise conditions for habitable rooms
- 23) Noise from mechanical plant to be 10dB below background noise
- 24) Installation of ultra low NOx boiler
- 25) Any other planning condition(s) considered necessary by the Director of Planning and Sustainable Regeneration

Informatives

- 1) Granted subject to a Section 106 Agreement
- 2) Community Infrastructure Levy
- 3) Code of practice for Construction Sites
- 4) Highways informative in relation to s278 and s38 works required
- 5) Compliance with Building/Fire Regulations
- 6) Construction Logistics Informative
- 7) Thames Water Informatives
- 8) Any other informative(s) considered necessary by the Director of Planning and Sustainable Regeneration

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

2.6 That if within 3 months of the committee meeting date, the legal agreement has not been completed, the Director of Planning and Sustainable Regeneration is delegated authority to refuse planning permission.

3 PROPOSAL AND LOCATION DETAILS

Proposal

3.1 Permission is sought for:

- Demolition of the building on the site and erection of 2 new 4-storey buildings comprising 31 residential units.
- Re-use of the existing vehicular access point on Beech Avenue and provision of 29 car parking spaces on site including a car club space.
- Communal bin and bike storage and an Air Source Heat Pump enclosure are proposed externally.
- Trees on the site boundaries would be retained and landscaping is proposed across the site.

Amendments

- 3.2 The initial public consultation took place between 7 January 2022 and 30 January 2022.
- 3.3 The Council was not able to support the application as originally submitted and advised the applicant as such. Following initial feedback from the Council the applicant opted to return for 2 follow-up pre-application meetings (pre-application ref: 22/03882/PRE), following which amended plans were provided as part of the same application reference.
- 3.4 Re-consultation on the revised plans took place between 14 November 2022 and 7 December 2022. The amendments were a revised site layout to reduce the number of buildings from 3 to 2, whilst retaining 31 units.



Figure 1: Proposed CGI (rear of block 2)

Site and Surroundings

- 3.5 The application site lies on the corner of Beech Avenue and Purley Downs Road, comprising a large, detached property. Land levels fall from the east to west from and north to south. The site contains a high density of trees of considerable public amenity value and environment benefit. There is a Tree Preservation Order which covers the site (TPO 145, 1961). A TPO also covers Barrards Hall which is adjacent to the north (TPO 41, 2014).
- 3.6 To the southwest of the site is a three storey flatted block (with a pitched roof) located on higher ground (14-25 Purley Downs Road). 7 Beech Avenue to the east of the site

is a detached single family dwelling which shares vehicular access with the application site. Barrards Hall, a three storey flatted block (also with a pitched roof) is located to the northeast of the site. The remainder of the surrounding area is predominately characterised by detached single family dwelling houses of 2 storeys in height with pitched roofs.

- 3.7 Purley Beeches to the northeast is protected open space and a Site of Importance for Nature Conservation (SINC), and Purley Downs Golf Course to the south east is Metropolitan Open Lane, a SINC, and an Archaeological Priority Area. Purley Downs Road is a classified road. The site is at low risk of surface water flooding.



Figure 2: Site location plan

Planning Designations and Constraints

- 3.8 The site is subject to the following formal planning constraints and designations:

- PTAL: 2
- Purley Downs Road is a Borough Classified Road
- Flood Risk Zone: 1
- Surface water flood risk: very low

Planning History

- 3.9 The following planning decisions are relevant to the application:

- 3.10 20/00558/FUL: Demolition of a dwelling with garage (Red Gables) and the erection of a part 3/4 storey block of 34 flats, comprising 8 no. 1 bedroom flats, 3 no. 2 bedroom 3 person flats, 8 no. 2 bedroom 4 person flats and 15 no. 3 bedroom units; basement parking, cycle and bin storage; associated landscaping. – Permission refused 07.05.2020 but allowed at appeal (ref: APP/L5240/W/20/3257791) on 26/07/22. *This is the fallback scheme.*

3.11 21/02056/FUL: Demolition of property on the site and erection of a part three/part four-storey building comprising 31 flats, widening of the existing access, provision of vehicular parking and hard and soft landscaping. – Permission refused 22.10.2021 for the following reasons:

- The development would fail to adequately contribute to addressing London's and the borough's need for affordable homes and would therefore be contrary to Policies SP2.4 and SP2.5 of the Croydon Local Plan (2018) and Policies H4 and H5 of the London Plan (2021)
- The development would fail to contribute to meeting the borough's needs for family sized homes, contrary to Policies SP2.7 and DM1.1 of the Croydon Local Plan (2018)
- The development would be harmful to the character of the locality and detrimental to the visual amenity of the surrounding townscape by reason of its scale, form and design, and absence of any critical character analysis, contrary to Policies SP4.1, SP4.2 and DM10 of the Croydon Local Plan (2018) and Policy D3 of the London Plan (2021)
- The development would result in a sub-standard quality of external private and communal amenity space and an absence of play space, contrary to Policies DM10.4 and DM10.5 of the Croydon Local Plan (2018) and policy D6 of the London Plan (2021)
- The development would not provide an adequately inclusive or accessible accommodation, by reason of the absence of a lift and any M4(3) dwellings, contrary to policy SP2.8 of the Croydon Local Plan (2018) and policy D7 of the London Plan (2021)
- A Fire Statement has not been submitted so insufficient information is provided to demonstrate that fire risk has been adequately mitigated, contrary to Policy D12 of the London Plan (2021)
- The development would be harmful to the verdant landscape character of the area by reason of the significant mass of built form, hardstanding and car parking and limited, poor quality soft landscaping proposed, contrary to Policies SP7 and DM10.8 of the Croydon Local Plan and Policy G5 of the London Plan (2021)
- The development would have a harmful impact on protected trees on the site which would be detrimental to the character of the area, contrary to Policies SP7, DM10.8 and DM28 of the Croydon Local Plan (2018) and Policy G7 of the London Plan (2021)
- Insufficient information has been provided to demonstrate that the development would not result in unacceptable harm to European Protected Species (Bats and Dormice) and Protected Species (Reptiles) and Protected habitats, contrary to Policies SP7.4 and DM27 of the Croydon Local Plan (2018) and Policy G6 of the London Plan (2021)
- Insufficient information has been provided to demonstrate that the development would not result in unacceptable levels of overspill parking and detrimental

impacts on the local highway network, contrary to Policies DM29 and DM30 of the Croydon Local Plan (2018)

- The proposed cycle store and refuse store do not comply with the requirements of Policies DM29, DM30 and DM13 of the Croydon Local Plan (2018).
- Insufficient information has been provided to demonstrate that the proposed sustainable drainage strategy would adequately mitigate flood risk from the site, contrary to Policies SP6.4 and DM25 of the Croydon Local (2018) and Policy SI13 of the London Plan (2021)
- No information has been provided to demonstrate that the development would be net zero carbon, contrary to Policy SP6.2 of the Croydon Local Plan (2018) and Policy SI2 of the London Plan (2021)

The appeal (APP/L5240/W/20/3257791) was subsequently dismissed.

Relevant pre-application history

- 3.12 22/03882/PRE: Demolition of existing building and erection of 2 x 3.5 storey buildings comprising 31 residential units plus car parking and hard and soft landscaping. *(Published online)*

[The purpose of this pre-app was to discuss amendments to the scheme originally submitted under the current application ref: 21/06145/FUL. Following this meeting (on 29/09/22), amended plans were received and re-consultation took place, as detailed in section 3 above].

- 3.13 22/00378/PRE: Demolition of existing building and erection of 2 buildings ranging in height from 3 to 4 storeys comprising 31 residential units plus 29 car parking spaces and associated landscaping. *(Published online)*

Older pre-application history

- 3.14 19/00336/PRE: Demolition of existing building and construction of 5 storey block comprising 36 flats with basement car/cycle parking, new pedestrian access and amenity space.
- 3.15 18/02548/PRE: Demolition of existing dwelling. Construction of 4/5 storey block comprising 39/41 flats with basement car/cycle parking and new pedestrian access.
- 3.16 16/03471/PRE: Demolition of the existing dwelling and construction of 5 storey block comprising 43 flats with basement car/cycle parking and new pedestrian access.
- 3.17 14/05350/PRE: Demolition of the existing dwelling and erection of 8 houses and associated parking or erection of 32 flats over four storeys with associated parking and new access road
- 3.18 13/02757/PRE: Demolition of existing dwelling and replacement with 7 house or 9 flats.

4 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The proposed development of 31 residential units on this large site in a residential area is acceptable in land use terms.
- 15% affordable housing is proposed in the form of 6 x First Homes for first time buyers.
- The proposed buildings are of an acceptable design and appearance that respond appropriately to the character of the area and would be an improvement compared with the fallback position.
- The proposed site layout and quality of accommodation would be acceptable.
- Amenity impacts on neighbouring properties would be adequately mitigated.
- Protected trees would be retained, and any proposed tree removals would be mitigated by replacement tree planting and a high quality landscaping scheme.
- 29 car parking spaces including an on-site car club space are proposed, which is appropriate given the accessibility level of the site.
- Surface water flood risk has been considered and an acceptable SUDS scheme is proposed.
- No detrimental impacts on ecology are identified and appropriate precautionary and enhancement measures are proposed.
- Suitable planning obligations and conditions are recommended.

4.1 The following sections of this report summarise the officer assessment and the reason for the recommendation.

5 CONSULTATION RESPONSE

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

5.2 The following were consulted regarding the application:

Spatial planning (design)

5.3 Discussion provided in the report below.

Strategic Transport

5.4 Amendments have been made to respond to comments. Further detail is provided below.

Ecology

5.5 Following receipt of additional assessment, no objection subject to conditions. Further detail is provided below.

Trees

5.6 No objection subject to replacement planting. Further detail is provided below.

Pollution Control

5.7 Conditions/informatives are required in relation to the following:

- Control of pollution and noise from demolition and construction sites

- Submission of a Construction Logistics Plan
- Contaminated land condition – requiring an intrusive site investigation prior to commencement assessment into the possibility of soil, water and gaseous contamination, details of remediation and a validation report
- The Air Quality Assessment prepared by SRE is satisfactory and the recommendations must be complied with.
- Standard noise standards condition for living rooms and bedrooms
- Noise from mechanical plants or other external fixed machinery should be 10dB below existing background noise levels
- External lighting should comply with Guidance Notes for the Reduction of Obtrusive Light GN01:2011 to avoid causing nuisance to local residents.
- Ultra-low NOx boiler must be installed
- Sound insulation within the floors or ceilings should as a minimum, meet the standard specified in The Building Regulations 2003 Approved Document E: Resistance to the Passage of Sound. (*Officer note: this is a building regs matter and will not listed as a planning condition*).

Lead Local Flood Authority (LLFA)

5.8 Following the submission of additional information, no objection to the drainage strategy subject to the inclusion of an appropriate condition including the following details:

- Provision of a final Drainage Layout Plan, confirming the final SuDS strategy for the site, supported by appropriate hydraulic modelling calculations.
- Confirmation of existing runoff rates during 1 in 1 year, 1 in 30 year, 1 in 100-year storm events and post development discharge rates during 1 in 1 year, 1 in 30 year, 1 in 100 year, 1 in 100 year + Climate change storm events.
- Further infiltration test data, in accordance with BRE365, to be provided to suit the proposed location and depth of all infiltration features.

Designing out Crime

5.9 Overall, with some minor amendments, the scheme is suitable to achieve Secure by Design accreditation and this should be conditioned. Further information is required regarding:

- The boundary treatments around the perimeter of the buildings and at the rear of the site;
- The access arrangements / right of way via the vehicle gates to the rear of the site which would be used by non-residents;
- Defensible space around doors and windows at ground floor level;
- External cycle storage should be secure;
- Fobbed lifts and an appropriate access control system are recommended;
- Refuse stores should be robust

Thames Water

- No objection subject to following the sequential approach for the disposal of surface water.

- Informative regarding minimising groundwater discharged to the public sewer to be included on any permission.
- Recommend that petrol/oil interceptors be fitted in all car parking/washing/repair facilities to avoid oil-polluted discharges entering local watercourses.
- The proposed development is located within 15 metres of a strategic sewer. A condition requiring submission of a piling method statement to be included.
- No objection in relation to the waste water network and sewage treatment works.
- Advise that the site falls within a Source Protection Zone for groundwater abstraction. Thames Water's guidance on groundwater protection should be referenced.

6 LOCAL REPRESENTATION

First Consultation

- 6.1 A total of 30 neighbouring properties were initially notified about the application and invited to comment. The application was advertised in the Croydon Guardian (January 2022) and a site notice was displayed outside the site.
- 6.2 The Sanderstead Residents' Association objected to the scheme (based on the initial drawings comprising 3 blocks) on the following grounds:
- The separation distance between blocks 1 and 2 is only 9.7m which means direct overlooking of some habitable rooms.
 - The applicant has included some high level windows to reduce potential overlooking but it is a contrived solution driven by the density. The result is compromised quality of living for some flats.
 - The first and second floor balconies of Flats 4 and 6 directly overlook the 10m rear garden privacy zone of the development at 14 -25 Purley Downs Road.
 - The master bedroom of Flat 2 and the living room of Flat 1 have windows directing facing a footpath/access route meaning persons can walk directly up to the windows. A landscaper privacy zone is required to protect resident's amenity.
 - Whilst all the flat units meet the minimum national space standards for gross internal area based on the published areas, they fail to meet the more detailed requirements of the guidance.
 - 24 of the flats have no built in storage provided and therefore are unacceptable.
 - Flats 7,8, 9 and 10 are shown as 1 person 1-bedroom units which are generally not supported as desirable. The layouts show a large bedroom with a double bed which compromises the available kitchen/ living/dining area. If Croydon planners accept that 13% of the proposed total units can be 1 person 1 bedroom the bedrooms areas should be reduced to prevent a double bed being accommodated and the living area enlarged accordingly.
 - The living areas of Block 2 Flats 7 & 9 face directly north and are facing directly towards the three storey Block 1 only 8.7m away. The flats will be dark and overshadowed.
 - On the basis the proposed bedrooms are as shown with either double or single beds indicating their occupancy Flats 1,2, 3,4 5,6,11,12, 13,14,18,19, 22,23,26,27,30 and 31 are below standard for bedroom sizes.
 - Flats 2,16, and 17 are identified as wheelchair accessible but are unlikely to meet M4(3) standards.

- Car parking is provided on the basis of 1 space per flat. Croydon planners are now applying the revised car parking standards contained in the emerging revised Local Plan which recognises parking pressures in areas with low PTAL levels. Under the new guidance sites with a low PTAL rating (the site is (PTAL 1 b) must accommodate all car parking on site at a level of 1 space per 1 -2 bedroom unit and 1.5 spaces per 3 bedroom unit. On that basis 36 spaces are required for this development and not the 31 spaces proposed. The site is sufficiently large to accommodate the higher number of spaces.
- The number of trees being removed is excessive caused by over development. These are also mature well-established trees which are absorbing a large amount of Co2.

Officer response: Thank you for the detailed observations. The issues raised regarding quality of internal accommodation have been amended in the revised plans.

6.3 Councillor Hopley objected to the scheme (based on the initial drawings comprising 3 blocks) on the following grounds:

- Room sizes are small and cramped and don't allow for movement of disabled residents, particularly when they have furniture or fitted cupboards.
- Generally an over-development of the site

Re-consultation

6.4 Following amendments, the application was advertised again in the Croydon Guardian (November 2022) and another site notice was displayed outside the site. During the re-consultation, 50 neighbouring properties (all those who were originally notified plus anyone who had commented previously) were notified about the amended plans and invited to comment.

Public Representations

6.5 The number of representations received from neighbours, local groups etc. in response to both rounds of public consultation were as follows:

No of individual responses: 26 Objecting: 24 Supporting: 0 Neutral: 2

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

Objection	Officer comment
Parking and highways impacts	
<ul style="list-style-type: none"> • 31 parking spaces is insufficient and will lead to overspill parking on Beech Avenue, Purley Downs Road and Whimbrel Close • Parked cars on Beech Avenue could restrict the 359 bus route and emergency vehicles 	<ul style="list-style-type: none"> • Discussed in the report. A policy compliant level of car parking is proposed and parking stress is 8% which is low. • Provision of on-site cycle parking is a policy compliant

<ul style="list-style-type: none"> • People will have multiple cars. • People don't use cycles in reality due to the terrain • The existing access way is not wide enough to accommodate the level of traffic. The existing access is too close to Barrards Hall and will cause noise. • A passing space for cars should be provided on the access road • Yellow lines should be provided on the road outside to prevent cars parking too close to the entranceway • Consideration should be given to moving the main access to Purley Downs Road in order to reduce traffic on Beech Avenue • The proposed entrance onto Purley Downs Road is unnecessary. The existing boundary of trees and vegetation should be kept. The development would be more secure without this. • There is already congestion near the junction. • There is already on-street parking at this end of Beech Avenue from overspill from the golf club • No visitor parking provided • A more detailed review of traffic implications should be undertaken alongside application 21/06380/FUL (104 Purley Downs Road – 7 houses). 	<p>and may encourage more sustainable/active methods of travel.</p> <ul style="list-style-type: none"> • Amendments to the width and shape of the accessway are proposed. • A passing space is provided. • There are already double yellow lines on the Beech Avenue/Purley Downs Road corner. Additional yellow lines are not required. • The access on Beech Avenue is existing. A vehicle entrance on Purley Downs Road would not be appropriate as it is a busier, classified road. • The PDR entrance is for pedestrians and refuse collection only. • Parking stress overnight is low. Overspill parking from the golf club during the daytime is noted however this is an external factor which should not prejudice development on this site. In any case, overspill parking is anticipated to be low due to the almost 1:1 parking provision on site alongside the car club space. • Visitor parking is not a policy requirement. • 21/06380/FUL provides 1:1 car parking.
Impacts on neighbouring amenity	
<ul style="list-style-type: none"> • The plant compound located next to parking space 16 will be noisy. This should be moved as far as possible from Barrards Hall. • The play area is large and would be noisy. 	<ul style="list-style-type: none"> • Addressed in the report • The play area would not cause an unacceptable amount of noise. • Addressed in the report

<ul style="list-style-type: none"> • Loss of light and overlooking to the west facing flats and balconies of Barrards Hall • Loss of privacy and amenity to surrounding properties 	<ul style="list-style-type: none"> • Addressed in the report
Quality of external space (play area and boundary treatments)	
<ul style="list-style-type: none"> • The play area is near to the boundary and children could wander onto the road. Play area should be relocated from the SW corner of the site to the SE corner. • The play area would be shaded • The FRA suggests surface water would flow to the south and west so it makes sense to move the play area elsewhere. • Further consultation with the developer is required regarding the boundary treatment with the cottage • The boundary running from the NW corner of flats 14-25 up to the cottage should be maintained as a soft boundary with the existing trees and additional planting • The laurel hedging boundary to the rear of flats 14-25 to be improved plus railings installed. 	<ul style="list-style-type: none"> • The play space has been located to the centre of the site. Discussed in the report. • • The Cottage is under the same ownership and the occupiers will continue to have access through the site. • New hedge planting is proposed along the retaining wall where space allows. Existing planting on the boundary (within Barrards Hall) will be retained. Full details of boundary treatments will be required by condition.
Impacts on flooding, trees, ecology	
<ul style="list-style-type: none"> • Appendices A to E of the FRA are not included. • Impacts on protected trees • Impacts on nesting birds and wildlife 	<ul style="list-style-type: none"> • FRA appendices are online • Addressed in the report
Character and design	
<ul style="list-style-type: none"> • Scale and mass out of character. Obtrusive by design. • Building is too high and will loom over neighbours • Over-development • The height should be no more than 3 storeys (same as Barrards Hall) 	<ul style="list-style-type: none"> • Addressed in the report.
Bins	
<ul style="list-style-type: none"> • The refuse vehicle will have to drive up the access way and reverse back down 	<ul style="list-style-type: none"> • The refuse vehicle can turn on the access road outside The Cottage.

<p>as there is no turning circle. This will be dangerous.</p> <ul style="list-style-type: none"> The suggestion that a management company would move the bins is unworkable 	<ul style="list-style-type: none"> This is a common arrangement on large sites such as this.
Other planning matters	
<ul style="list-style-type: none"> The loss of old houses and replacement with generic blocks of flats is not supported No more flats are required in Sanderstead Would prefer houses Fails to contribute to the borough's needs for family housing 	<ul style="list-style-type: none"> Addressed in the report. Flats are acceptable and provide a mix of different housing typologies Family sized units are provided.
Not material matters	
<ul style="list-style-type: none"> Impacts on gas and water pressure 	<ul style="list-style-type: none"> To be dealt with outside of planning.

7 RELEVANT PLANNING POLICIES AND GUIDANCE

Development Plan

7.1 The Council's adopted Development Plan consists of the London Plan (2021), the Croydon Local Plan (2018) and the South London Waste Plan (2022). Although not an exhaustive list, the policies which are most relevant to the application are:

London Plan (2021)

- D1 London's form, character and capacity growth
- D3 Optimising site capacity through the design led approach
- D4 Delivering Good Design
- D5 Inclusive Design
- D6 Housing quality and standards
- D7 Accessible housing
- D12 Fire Safety
- H1 Increasing housing supply
- H2 Small sites
- G5 Urban Greening
- G6 Biodiversity and access to nature
- G7 Trees and Woodlands
- SI 2 Minimising Greenhouse Gas Emissions
- SI 8 Waste Capacity and Net Waste Self-Sufficiency
- SI 12 Flood Risk Management
- SI 13 Sustainable Drainage
- T4 Assessing and mitigating transport impacts
- T5 cycling
- T6 car parking
- T6.1 Residential parking

Croydon Local Plan (2018)

- SP2 Homes
- SP4 Urban Design and Local Character
- SP6 Environment and Climate Change
- SP8 Transport and communications
- DM1 Housing Choice for Sustainable Communities
- DM10 Design and Character
- DM13 Refuse and Recycling
- DM16 Promoting Healthy Communities
- Policy DM18: Heritage assets and conservation
- DM23 Development and Construction
- DM25 Sustainable Drainage Systems and Reducing Flood Risk
- DM27 Biodiversity
- DM28 Trees
- DM29 Promoting Sustainable Travel and Reducing Congestion
- DM30 Car and cycle parking in new development
- DM40 Kenley and Old Coulsdon

7.2 The Development Plan should be read as a whole, and where policies conflict with each other, the conflict must be resolved in favour of the policy contained in the last document to be adopted, approved or published as part of the development plan, (in accordance with s38(5) of the Planning and Compulsory Purchase Act 2004).

Planning Guidance

National Planning Policy Framework (NPPF)

7.3 Government Guidance is contained in the NPPF, updated on 20 July 2021, and accompanied by the online Planning Practice Guidance (PPG). 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 Sustainable Transport
- Achieving Well Designed Places

SPDs and SPGs

7.4 There are also several Supplementary Planning Documents (SPD) and Supplementary Planning Guidance (SPG) documents which are material considerations. Although not an exhaustive list, the most relevant to the application are:

- London Housing SPG (March 2016)
- Technical Housing Standards: Nationally Described Space Standard (2015)
- National Design Guide (2021)
- Housing Design Standards LPG (2023)

8 MATERIAL PLANNING CONSIDERATIONS

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

1. Principle of development
2. Housing tenure and size mix
3. Design and impact on the character of the area
4. Quality of residential accommodation
5. Impact on neighbouring residential amenity
6. Trees, landscaping and biodiversity
7. Access, parking and highway impacts
8. Flood risk
9. Sustainability
10. Fire safety
11. Conclusions

Principle of development

8.2 The Croydon Local Plan sets out a housing target of 32,890 homes over a 20-year period from 2016-2036. The London Plan requires 20,790 of those homes to be delivered within a shorter 10-year period (2019-2029), resulting in a higher target of 2,079 homes per year. The Croydon Local Plan also sets out a target for development on Windfall sites of 10,060 homes (approximately 503 per year) and the London Plan has a higher “small sites” target of 641 homes per year.

8.3 Croydon Local Plan Policy SP2 explains that developments should ensure land is used efficiently. London Plan policy H1 states that boroughs should optimise housing delivery, particularly on (but not limited to) sites of PTAL 3-6 or within 800m of a train station or town centre boundary (neither of which apply to this site). CLP Policy SP2 requires development to ensure land is used efficiently, and LP Policy H2 requires boroughs to pro-actively support well-designed new homes on small sites, to significantly increase the contribution of small sites to meeting London’s housing needs; and support small and medium-sized housebuilders.

8.4 The site is a large (0.48ha) corner plot within an established residential area and is currently under-utilised, so is an appropriate site for comprehensive redevelopment to provide additional homes without having a significant impact on local character.

8.5 Furthermore, the principle of redeveloping this site has been established with the allowed appeal for 31 units (application ref: 20/00558/FUL), which is the fallback position for the site. There are various constraints on this site and the Council considers that these have been overcome in the current proposal, as outlined throughout this report, and this scheme is ultimately considered to be an improvement on the fallback scheme that was allowed at appeal.

Use

8.6 The existing dwelling on the site is a large residential property. It is currently used as a home providing supported living for vulnerable adults and has around 17 bedrooms, however no planning permission has been granted for formal change of use from a single dwelling. Planning permission has already been granted for the demolition of the building and replacement with flats (the fallback position), and the proposal would

provide replacement housing, therefore no objection is raised to the demolition of the existing building.

Housing tenure and size mix

Tenure

- 8.7 London Plan policy H4 and Local Plan policy SP2.4 set a strategic target for 50% of homes delivered across London and across Croydon to be genuinely affordable, subject to viability. The fast-track approach outlined in London Plan policy H5 applies where schemes provide 35% affordable housing on site and means that viability assessment is not required. If this is not achieved then the Viability Tested Route must be followed. In this application, the viability tested route has been followed in accordance with London Plan policy H5.
- 8.8 The applicant's viability assessment dated October 2022 submitted with the application outlines that provision of 35% affordable housing (11 units) on the site would result in a significant deficit of £1,009,540. A scheme providing all of the units for market sale would result in a surplus of £131,087. Both scenarios were assessed by an independent viability consultant on behalf of the Council who concluded that a scheme providing 35% affordable housing on site (11 units) would result in a slightly lower deficit of £956,258 and a scheme providing all units for market sale would result in a slightly higher surplus of £191,517. The slight discrepancies in these figures are mainly due to different inputs related to the potential value of 11 affordable units.
- 8.9 The applicant has outlined in their submitted Affordable Housing Statement how they have sought to secure a registered affordable housing provider for the site. A marketing process was undertaken whereby 2 scenarios were put forward to a total of 42 affordable housing providers, as follows: 1) The RP acquires the site with the benefit of planning permission for 31 flats; and 2) The RP acquires 11 units to be provided as affordable housing (notwithstanding the findings of the viability appraisal that 11 affordable homes would be unviable for the developer). The marketing exercise took place on an ongoing basis between May 2022 and October 2022. Evidence of email exchanges have been provided. No affordable housing provider was secured.
- 8.10 As a next step, Local Plan policy SP2.5 sets out a minimum of 15% affordable housing must be provided on site, along with a late stage review mechanism for additional affordable housing contributions up to 50% of overall provision. This requirement is not subject to viability. The applicant's viability appraisal assesses provision of 15% on-site provision (6 units) of affordable housing on site at a discounted market sale tenure known as First Homes. This assessment concludes that provision of 6 First Homes would result in an overall deficit of £129,856. The Council's independent viability consultant concludes that the provision of 6 First Homes on site would result in a smaller deficit of £89,241. Therefore, it would not be financially viable to provide more affordable housing and this option has been taken forward. Provision will be of 6 x First Home comprising 2 x 1b2p units, 3 x 2b3p units and 1 x 3b4p unit, or 17 habitable rooms. Out of the 31 units proposed, 6 would be affordable (19.4%), and out of the 112 habitable rooms proposed, 17 would be affordable (15.2%).
- 8.11 First Homes are discounted market sale units that must be discounted by a minimum of 30% against the market value. They may only be sold to people who meet eligibility criteria including being a first time buyer and having a household income below a certain threshold (a combined annual household income not £90,000 in Greater

London in the tax year immediately preceding the year of purchase), and the discount must be retained on the home in perpetuity. First Homes must have a first sale price no higher than £420K in Greater London. The Government's guidance states that First Homes are the government's preferred discounted market tenure and should account for at least 25% of all affordable housing units delivered by developers through planning obligations.

- 8.12 Local Plan policy SP2.4 outlines that the Council seeks to achieve a 60:40 ratio between affordable rented homes and intermediate homes. The proposal for 6 x First Homes would represent a 100% intermediate tenure. This tenure split is, however 'sought' rather than 'required' by policy, and it has been demonstrated within the viability assessment and Affordable Housing Statement that a lower cost unit mix would not be viable. Further, London Plan policy H5 and Local Plan policy SP2.5 require early and late stage review mechanisms for viability tested schemes. Therefore, review mechanisms will be entered into as part of the S106 Agreement for the remaining affordable housing up to the equivalent of 50% overall provision through a commuted sum based on a review of actual sales values and build costs of completed units.
- 8.13 By way of comparison, in the fallback scheme that was allowed at appeal (application ref: 20/00558/FUL), the affordable housing secured by S106 agreement is for on site provision of 8 x 1-bed shared ownership units (14.7% by habitable room at 100% intermediate tenure) with early and late stage review mechanisms. No registered provider had been secured. One benefit of the current proposal for 6 x First Homes is that there is no need to secure a registered provider as the requirement is that the homes are sold at a discounted market value, in accordance with the Government guidelines, and this can be overseen and managed by the developer.
- 8.14 Given the history, the findings of the viability assessment, and the evidenced attempts made by the applicant to secure an RP for the site, the provision of 6 First Homes on the site, representing 15% provision, is considered acceptable in compliance with Local Plan Policy SP2 and London Plan Policies H4 and H5.

Unit size mix

- 8.15 Local Plan policy SP2.7 sets a strategic target for 30% of all new homes over the plan period to have 3 or more bedrooms to ensure that the borough's need for family sized units is met. Policy DM1.2 seeks to avoid a net loss of 3-bed family-sized homes and DM1.1. requires that in suburban areas of low PTAL (such as the application site) 70% of homes delivered on major sites have 3 or more bedrooms. The proposal is for 21 x 3b4p, 2 x 2b4p, 6 x 2b3p, 2 x 1b2p units which comprises 68% 3-bed units overall. This falls just short of the 70% target however is considered acceptable when balanced against other material planning considerations discussed throughout this report.

Design and impact on the character of the area

- 8.16 The existing property is not statutorily listed nor locally listed and does not fall within a conservation area. Whilst the building contains some attractive qualities, it does not hold any specific architectural merit and is not visible from the street so does not contribute significantly to the character of the area. As such, there is no planning policy objection to its demolition (and its demolition was approved by the previous appeal decision).

8.17 Policies SP4.1 and DM10.1 of the Local Plan state that the Council will require development of a high quality, which respects and enhances Croydon's varied local character and contributes positively to public realm, landscape and townscape. Proposals should respect the development pattern, layout and siting; the scale, height, massing, and density; and the appearance, existing materials and built and natural features of the surrounding area. London Plan policy D3 states that a design-led approach should be pursued and that proposals should enhance local context by delivering buildings and spaces that positively respond to local distinctiveness.

Site layout

8.18 The site is a spacious corner plot surrounded by mature trees and, as outlined in the Principle section above, is suitable for new housing. The proposal is for the erection of 2 blocks on the site. The number of buildings proposed has been consolidated from 3 to 2 during the assessment of the application (via the pre-application process) in order to provide an improved site layout, a reduced bulk of built form across the site, greater separation between the buildings and more space for soft landscaping. The footprint and positioning of the proposed blocks has been informed by the Root Protection Areas (RPAs) of the protected trees on the site boundary, and the building line on Beech Avenue would align with the front elevation of Barrards Hall. The proposed footprints of each block would be broadly in proportion with the neighbouring blocks at Barrards Hall to the north and 14-25 Purley Downs Road to the southeast so would result in a complementary relationship with the surrounding buildings, respecting the development pattern of the area. The 2 blocks would be read as 2 large buildings set within large landscaped plots, similar to the siting of Barrards Hall and 14-25 Purley Downs Road.

8.19 The separation distance between the 2 blocks would be 18m, which would comply with guidance in the London Housing Design Guide which states that 18-21m is a 'useful yardstick' for separation distances between dwellings to ensure visual privacy. The 2 buildings would have their main front entrances facing each other, creating a central courtyard space and focal point for the site. Children's play space, cycle parking and disabled car parking would also be located in the centre of the site where it is easily accessible and well-overlooked. The plot is large and the buildings would be set well into the plot (12m from the site boundary on Beech Avenue and over 20m from the site boundary on Purley Downs Road), maintaining the spacious feel of the area.

8.20 The existing access point on Beech Avenue would be re-used, with some straightening of the internal access road to accommodate increased vehicle movements. 29 car parking spaces are proposed on the south east and north east sides of the site where there are fewer tree constraints and where the parking would be least visible from the main public vantage points on Beech Avenue and Purley Downs Road. Positioning the car parking area at the rear helps to maintain the open character of this corner plot, and also supports the sense of spaciousness when entering the site from Beech Avenue or Purley Downs Road. Pedestrian paths around the site are proposed to support walkability around the site. Mature trees would form the boundary treatments on both street frontages, therefore reinforcing the verdant and open character of the wider area.

8.21 The site is one of the largest in the area and the proposed layout maintains a large proportion of open space across the site, striking an appropriate balance between hard standing / built form and the retention of soft landscaping / greenery. In comparison to the fallback position approved at appeal under application ref: 20/00558/FUL, the

proposed site layout is considered to be more contextual as it would result in smaller footprints that are more in keeping with the scale of neighbouring flatted blocks, which is considered to be superior to the excessive footprint of the single flat roofed block approved at appeal.

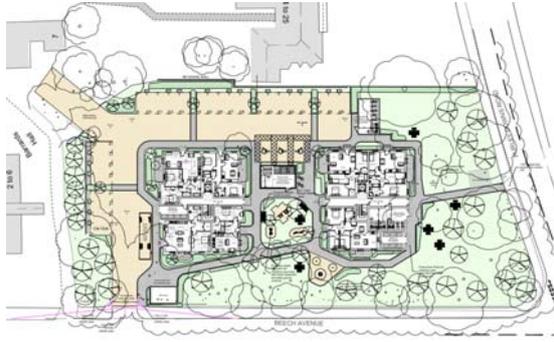


Figure 3: Proposed site layout (current)



Figure 4: Proposed site layout (fallback)

Scale and mass

8.22 The 2 proposed blocks on the site would be 4 storeys in height, with the 4th floor set partially within the roof level. There are flatted blocks in the immediate vicinity including Barrards Hall to the north east and 14-25 Purley Downs Road to the south east, both of which are 3 storey blocks with gently pitched roofs above. Land levels on the site are sloping and the proposed ridge height of the blocks would be approximately 3.7m higher than Barrards Hall (Beech Avenue) and 1.7m lower than 14-25 Purley Downs Road, however the separation distance between the blocks and the tree coverage on the boundaries means that they would not be read comparatively in either instance. The separation distance to the side elevation of Barrards Hall would be 30m from block 1, across the access road, and to the closest part of 14-25 Purley Downs Road would be 15m away from the rear corner of block 1.

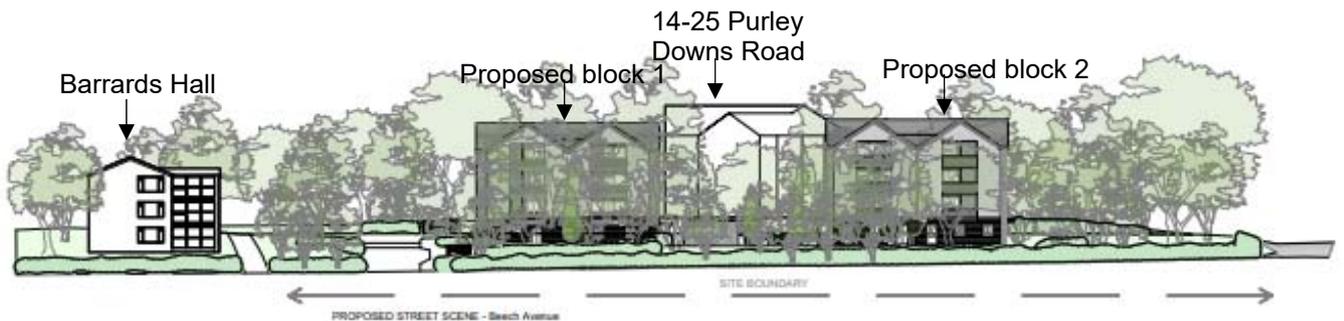


Figure 5: Proposed street scene, Beech Avenue



Figure 6: Proposed street scene, Purley Downs Road

8.23 In comparison to the fallback position approved at appeal under application ref: 20/00558/FUL, which is for one large, flat roof block with underground car parking positioned towards the north side of the site, the proposed splitting of the building mass into 2 separate blocks results in a scheme that would be significantly less bulky and much more contextual in comparison to the scale of the surrounding flats. The current proposed approach would be preferable.

Appearance

8.24 The proposed blocks would have gently pitched roofs and wide central gable features on the front and back elevations and double gables on the side elevations. The gables are not prominent but are of a scale that is reflective of the features of nearby properties. The symmetrical nature of the proposed windows gives the buildings a vertical and simple appearance. Balconies are partly extruded to provide some interest to the facades. Brick detailing is proposed at ground floor level to provide hierarchy to the facades and some articulation.

8.25 Proposed materials are predominantly red brick with clay roof tiles, and darker red brick on the gables which is reflective of surrounding materials. Grey aluminium windows and doors are proposed, providing a subtle contrast to the red brick. Balconies would have red brick bases with metal balustrades. The proposed materials are acceptable but details would be required by condition to ensure high quality.

8.26 In comparison to the fallback position approved at appeal under application ref: 20/00558/FUL, which reads as a commercial / hotel building, the proposed blocks are more contextual and residential in their appearance and form and are overall considered to be an improvement.

Quality of residential accommodation

8.27 The National Design Guide states that well-designed homes should be functional, accessible and sustainable. London Plan policy D6 states that housing developments should be of a high quality and provide adequately sized rooms with comfortable and functional layouts. It sets out minimum Gross Internal Area (GIA) standards for new residential developments and requires that 75% of the GIA of each dwelling has a floor to ceiling height of over 2.5m. Local Plan policy DM10.4 and London Plan policy D6 set out the standards for external private amenity space which is for 5sqm per 1-2 person unit and an extra 1sqm per occupant thereafter.

8.28 The table below summarises the assessment of the internal and external spaces of the proposed new dwellings against London Plan policy D6.

Block 1

Unit	Size (bedroom/person)	GIA (sqm) proposed	Min. GIA (sqm)	Amenity Space (sqm)	Min. Amenity Space (sqm)	Built in storage space (sqm)	Min. built in storage space (sqm)
1	2b4p	71.4	70	8.7	7	2.1	2
2 *	2b4p	87.4	70	10.9	7	2.3	2
3 *	1b2p	77	50	5.7	5	2.6	1.5
4 *	1b2p	59.3	50	5.4	5	1.5	1.5
5	2b3p	64	61	6.8	6	2.2	2
6	3b4p	78.1	74	7	7	2.5	2.5
7	3b4p	86.1	74	7.1	7	3	2.5
8	3b4p	78.3	74	7.3	7	2.7	2.5
9	2b3p	64	61	6.8	6	2.1	2
10	3b4p	78.1	74	7	7	2.5	2.5
11	3b4p	86.1	74	7.1	7	3	2.5
12	3b4p	78.3	74	7.3	7	2.7	2.5
13	2b3p	64.1	61	6.8	6	2.1	2
14	3b4p	78	74	7	7	2.5	2.5
15	3b4p	86.1	74	7.1	7	3	2.5
16	3b4p	79.1	74	7.3	7.3	2.7	2.5

* These are the M4(3) units.

Block 2

Unit	Size (bedroom/person)	GIA (sqm) proposed	Min. GIA (sqm)	Amenity Space (sqm)	Min. Amenity Space (sqm)	Built in storage space (sqm)	Min. built in storage space (sqm)
17	3b4p	80.1	74	7.6	7	2.5	2.5
18	3b4p	80.4	74	8.9	7	2.6	2.5
19	3b4p	76.5	74	8.3	7	3.9	2.5
20	3b4p	77.2	74	7.1	7	2.6	2.5
21	2b3p	66.2	61	7.1	6	2	2
22	3b4p	77.6	74	7.3	7	2.7	2.5
23	3b4p	79.4	74	7.1	7	2.9	2.5
24	3b4p	77.2	74	7.1	7	2.6	2.5
25	2b3p	66.2	61	7.1	6	2	2
26	3b4p	77.6	74	7.3	7	2.7	2.5
27	3b4p	79.4	74	7.1	7	2.9	2.5
28	3b4p	76.7	74	7.3	7	2.5	2.5
29	2b3p	66.2	61	7.1	6	2	2
30	3b4p	78.7	74	7.3	7	2.7	2.5
31	3b4p	77.9	74	7.1	7	2.9	2.5

Table 1: scheme considered against London Plan Policy D6 and Table 3.1

8.29 All of the units comply with the nationally described space standards and have sensible layouts including entrance hallways and a policy compliant amount of storage space. All units would be dual aspect and each unit has a private balcony or outside space,

accessed via the main living space. All balconies comply with policy requirements in terms of overall size and the required 1.5m depth. The ground floor units of each block would have private front doors with private outdoor patios. Ground floor M4(3) units within block 1 would also have doors leading from their bedrooms to the private outside spaces for fire safety reasons. Hedging is proposed as defensible space in front of ground floor windows and around private patios. The upper floor units would all be accessed via the central cores, and each block would have a lift. The buildings are designed with clearly visible, welcoming entrances and logical circulation spaces with no more than 4 homes accessed per floor per core. The proposal has been considered against the London Plan Housing Design Standards LPG and would provide high quality homes.

Accessibility

- 8.30 London Plan policy D7 requires 10% of new-build housing to be M4(3) 'wheelchair user dwellings' and the remainder M4(2) 'accessible and adaptable'. The proposal includes 3 x M4(3) units comprising units 2 (2b4p), 3 (1b2p) and 4 (1b2p) within block 1. These are marked on the plans and features such as height adjustable worktops, turning circles and wheelchair storage spaces are shown. These units have private front entrances at ground level with level thresholds and motion sensor lighting. Step free access to the facilities of the site, including the bin store, the external central bike store which includes 3 x accessible spaces, and the play space is also provided. There are 3 x blue badge parking spaces proposed for these 3 units, located in the centre of the site, close to the front doors.
- 8.31 A lift is proposed inside each building, so step free access to the front door of all other units would be provided, and to the facilities of the site, so all other units would achieve M4(2) standards. Details are acceptable and a compliance condition would be attached to ensure that the 3 units are provided to M4(3) standards and all others to M4(2) standards.

Overheating

- 8.32 London Plan policy D6 requires that the design of developments avoids overheating. A Thermal Comfort Report has been submitted modelling the thermal performance of the proposed development to consider whether the units would overheat. 7 sample dwellings have been selected for detailed analysis against current and future weather conditions: these are units 4, 17 and 18 on the ground floor, 23 and 27 on the first floor and 30 and 31 on the second floor. These units have been selected as they are the most likely to overheat as they have large windows with a south or west orientation.
- 8.33 The report demonstrates that all habitable rooms would pass the assessment under the current weather conditions. Passive methods (orientation, solar control glazing and shutters) have been incorporated to manage current weather conditions.
- 8.34 However, in the future weather scenario up to 2050, these habitable rooms would be likely to experience overheating. Communal corridors were also tested for overheating. The corridors would have communal heating pipework running through them and whilst there is no mandatory target for these spaces, there is a risk of overheating within these spaces both under the current and future weather scenario. The Council's Sustainable Development & Energy Officer has reviewed the assessment and has raised no specific objection to scheme, and has suggested that mitigation for the future weather scenario may include additional external shading (e.g. brise

soleil). Ultimately, active cooling may need to be retro-fitted in the future if climate change results in a significantly different climate by 2050, however this does not form part of the current application, and the application complies with current standards.

Communal amenity space and play space

- 8.35 London Plan policy S4 and Local Plan policy DM10.4d require provision of 10sqm of play space per child. The GLA population yield calculator estimates that provision of 31 units comprising a mix of private market and intermediate tenure (First Homes) would generate approximately 16.5 children and a requirement for 165sqm of children's play space. The proposal includes a main play area of approximately 115sqm within the central courtyard between the 2 blocks which is a well-overlooked location, and a second space of approximately 35sqm on the opposite side of the path to the west. There is a total of approximately 150sqm of dedicated play space proposed across the 2 play areas. Throughout the pre-application process the Council's Placemaking officer has encouraged informal and incidental play alongside more formal play areas, and there is opportunity for additional play around the site in the communal garden and amongst the trees (well in excess of 15sqm). The proposed quantum of space for play is well over the minimum requirement of 165sqm and therefore is acceptable. Timber play equipment is proposed within the play spaces and final details would be required by condition to ensure the quality of the equipment is high.
- 8.36 Local Plan policy DM10.5 requires provision of high quality communal outdoor amenity space within flatted schemes that is designed to be flexible, multifunctional, accessible and inclusive. A large proportion of the site is retained as open space and much of this is designated for use as communal garden space for all residents. Not all of the external space would be useable due to the tree coverage on the site boundaries and the slope of the land gradually downwards towards Beech Avenue, but there would still be a significant amount of amenity space available for residents. Pedestrian pathways would lead around the buildings and across the site and various areas of seating are proposed. The quality is acceptable.

Impact on neighbouring residential amenity

- 8.37 Policy DM10.6 of the Local Plan states that the Council will ensure proposals protect the amenity of occupiers of adjoining buildings and will not result in direct overlooking into their habitable rooms or private outdoor space and not result in significant loss of existing sunlight or daylight levels. The closest neighbouring properties are Barrards Hall to the north east, no. 7 Beech Avenue (The Cottage) to the north east of the site, and 14-25 Purley Downs Road to the south east.

Barrards Hall

- 8.38 The proposed separation distance between the north east elevation of block 1 and the front elevation of Barrards Hall to the north east would be 30m. This separation distance is adequate to ensure that the proposed 3.5 storey building would not raise amenity concerns in terms of overbearing, overshadowing or overlooking.
- 8.39 The Daylight, Sunlight and Overshadowing Report submitted in support of the application refers to the originally submitted scheme under the same application reference (21/06145/FUL) which comprised 3 buildings, however an addendum has also been submitted by the consultant which clarifies that the revised layout comprising

2 buildings would not alter the daylight, sunlight and overshadowing assessment as the revised scheme has a similar size, volume and height and is positioned in the same elevation, so the findings remain relevant. The Vertical Sky Component (VSC) test has been undertaken, measuring the amount of direct daylight reaching the centre of the windows on the front elevation of Barrards Hall (facing the application site). Guidance states that impacts comply with BRE guidelines if either 27% VSC in the proposed condition is achieved, or 0.8 (-20%) times the existing values is demonstrated. The report demonstrates that all windows tested within Barrards Hall would retain between 87% and 94% of their existing VSC, so the proposed development would not have a noticeable reduction in daylight reaching the facing windows of Barrards Hall.

- 8.40 The proposal would re-use the existing access point on Beech Avenue. The access road would be more heavily used as a result of the residential intensification of the site and the increase in the number of cars coming and going, however Barrards Hall has its own driveway running parallel to the driveway into the application site, so noise impacts would be negligible in comparison to the existing situation. In addition, new tree planting is proposed along the length of the boundary on the north east elevation which would mitigate impacts of noise and vehicle fumes.
- 8.41 Representations have raised concerns about the positioning of the plant area in proximity to Barrards Hall and the potential noise this could cause. With a separation distance of 30m (measured to the corner of the building at Barrards Hall), as well as 2 driveways and significant tree coverage, the plant is unlikely to emit noise to cause significant amenity concerns. A standard condition would be attached requiring that the noise level from mechanical plant or other machinery does not increase the background noise level when measured at the nearest sensitive residential premises. In effect, this means the noise level from any new units should be at least 10dB below existing background noise levels.

7 Beech Avenue (The Cottage)

- 8.42 The Cottage is an existing dwelling located to the eastern corner of the application site, accessed through the site. The access through to this property would be retained as existing. The proposed block 1 would be approximately 30m away from The Cottage so this separation distance would not raise any amenity concerns in terms of overbearing, overshadowing or overlooking. There would be more vehicular movement in proximity to The Cottage than the current situation as there is more car parking proposed on the site, which would potentially be an inconvenience to the occupier of The Cottage, however this would not outweigh the benefits of the scheme.
- 8.43 The daylight, sunlight and overshadowing report assesses the daylight impacts on The Cottage. All windows assessed would continue to retain between 93% and 97% of their VSC, therefore continue to comply with BRE guidelines.

14-25 Purley Downs Road

- 8.44 The block at 14-25 Purley Downs Road is between 14m and 19m from the southeast elevations of the proposed blocks. 14-25 Purley Downs Road is set at a higher land level and there is an existing retaining wall between the 2 sites. The proposal is to position the majority of the car parking along this boundary, with the hardstanding broken up by soft landscaping and tree planting. There is existing hedging, including some newly planted hedging, along this boundary, which would provide screening to the parking area. The positioning of car parking along this boundary would be visible

from the rear windows of the block at 14-25 Purley Downs Road, and would potentially lead to increased noise and fumes, but this would be mitigated as far as possible by the planting on this boundary and would not be significantly harmful to the amenities of 14-25 Purley Downs Road to constitute a reason for refusal. It has also been outlined elsewhere that this is the most suitable location within the site for car parking from a townscape and trees point of view.

- 8.45 The block at 14-25 Purley Downs Road has oriel windows so that views are directed towards Purley Downs Road and not directly towards the application site. These directional windows mean that inter-overlooking is not an issue. Upper floor units of both blocks would have long distance views towards the communal amenity space of 14-25 Barrards Hall however the separation distance is around 14m and views into communal amenity spaces are not protected in the same way that views into private gardens are under policy DM10.6.
- 8.46 The daylight and sunlight assessment assesses daylighting impacts on all rear and side facing windows of 14-25 Purley Downs Road. The results demonstrate that all windows Hall would retain between 86% and 106% of their existing VSC, therefore continuing to comply with BRE guidelines.

Other amenity impacts

- 8.47 The Daylight, Sunlight and Overshadowing Report also considered daylight and sunlight impacts on the properties on the opposite side of Beech Avenue to the west of the application site: 1-9 Beech Avenue. None of the windows facing the application site would receive a reduction in VSC beyond the BRE guidelines.
- 8.48 In terms of overshadowing of neighbouring gardens, impacts on 1-9 Beech Avenue and Barrards Hall and 14-25 Purley Downs Road have been tested. All gardens would continue to receive over 2 hours of direct sunlight on 21st March, with hardly any reduction in sunlight at all, so all would continue to comply with BRE standards for overshadowing.
- 8.49 A condition would also be attached ensuring light pollution does not cause a nuisance to local residents.

Trees, landscaping and biodiversity

Trees

- 8.50 Local Plan policy DM28 and London Plan policy T7 seek to retain existing trees and vegetation. All of the trees on the site are protected by a Tree Protection Order as the whole site (as well as Barrards Hall) are covered by TPOs (145 and 41). The site has significant tree coverage on its boundaries and the trees on the site form an important part of the verdant character of the area and have high amenity and biodiversity value.
- 8.51 The Arboricultural report assesses a total of 51 trees, groups and hedges across the site. 15 trees/groups are classified as category A or B; 25 trees/groups were classified as category C; 11 trees were classified as category U. The proposal is to remove all 11 of the Category U trees for management reasons due to their poor condition, plus an additional 12 trees to facilitate the proposed development (23 in total). The trees proposed for removal (which do not fall within category U) are 1 x category B tree (T12) and 11 x category C trees (Part of G4, G5, T7, part of G11, G14, T15, T16, G23, G39, T48 and T50).

- 8.52 Of the category U trees proposed for removal, 2 have been found within the Preliminary Ecological Appraisal to have 'moderate' potential for bat roosts. These are the Ash Tree within G35 and the Beech Tree T45. The Council's Ecologist has requested that the applicant undertake additional bat entry and re-emergence surveys on these 2 trees. The additional assessment was undertaken on 10/06/23 and it was found that T45 has already been removed (approved under application ref: 21/04301/TRE) and T35 (Ash tree – dead) has been downgraded to 'low' potential for roosting bats and can therefore be removed as proposed. This is discussed further in the Ecology section below.
- 8.53 The category B tree proposed for removal (T12) is located on the western side of the site to facilitate widening of the access driveway and the plant enclosure. The remaining category C trees/groups proposed for removal to facilitate development are generally located on the western side of the site to accommodate the access road and car parking spaces or are smaller trees towards the centre of the site which are proposed for removal to accommodate the buildings. The arboricultural assessment submitted provides justification for removal of the trees, and this reasoning has not been objected to by the Council's Tree Officer.
- 8.54 It was noted by Officers during the latest pre-application meeting that T24 (Beech tree towards the centre of the site) had been downgraded from a Category A tree to a Category U tree since a previous version of the Tree Report (submitted with application ref: 20/00558/FUL). The applicant has explained that this tree has become infected with *Meripilus giganteus* decay at the base since the previous assessment and photographic evidence has been provided. This is accepted by the Council's Tree Officer.
- 8.55 In order to mitigate the loss of these 23 trees, 46 replacement trees are proposed. These are shown on the proposed Landscaping Plan and comprise 23 x large trees, 10 x medium trees and 13 x small trees. They are proposed in various locations around the site, mainly on the boundaries, with the smaller trees around the central areas of the site.
- 8.56 The proposed development would also result in root incursion into 7 trees. This is generally as a result of new ground surfacing for car parking, pedestrian paths, cycle store and play space. It is proposed that new surfacing would sit above a cellular confinement system to reduce the need for excavation and disturbance within the roots. A full Arboricultural Method Statement and Tree Protection Plan is provided setting out how trees would be protected during construction. The Council's Tree Officer has confirmed that the tree documents submitted, alongside the proposed Landscaping Plan, are acceptable provided works are undertaken in accordance with the Tree Protection Plan. An appropriately worded compliance condition would be attached.
- 8.57 In comparison, the fallback position (application ref: 20/00558/FUL) proposed removal of 16 trees (including 2 x category B trees) and the Council's Tree Officer initially objected to the scheme on the basis that insufficient information was available regarding the impact of the proposed basement excavation and level changes required for access on the roots of retained trees. The Inspector, however, concluded that subject to appropriate conditions the scheme '*would not have a harmful effect on valued trees on site*'.

8.58 In the current application, the Council's Tree Officer has not objected to the proposal. Overall, the tree coverage on the site boundary, which provides significant amenity value and screening of the site, would be retained or enhanced by planting of new trees, so the verdant character of the site and the would be retained. The proposal is considered to comply with Local Plan policy DM28 and London Plan policy G7.

Landscaping

8.59 Local Plan policy DM10.8 requires incorporation of soft and hard landscaping within development proposals. London Plan policy G5 requires submission of an Urban Greening Factor (UGF) to demonstrate the amount of greening proposed as part of new major developments. The target score is 0.4 for residential schemes. A UGF calculation has been submitted, demonstrating that a policy compliant score of 0.47 would be achieved on the site through the retention of existing trees, planting of new trees, hedging and grass and the use of permeable paving.

8.60 The proposed landscaping involves amenity grass across the majority of the communal amenity space, with areas of species rich lawn around the perimeter of the building. Pedestrian paths would be finished in herringbone paving, with resin bound gravel and cobble setts in the car parking area. The new trees discussed above, as well as outdoor seating and play space are shown on the Landscaping Plan. The boundary treatment along the Beech Avenue and Purley Downs road frontages (behind the trees) are black powder coated railings of 1.1m in height.

8.61 The site is not level, and there are changes in level across the site which would be reflected within the proposal. There is a retaining wall adjacent to the boundary with 14-25 Purley Downs Road in addition to some banked land with a hedge; the proposal would replace this with a longer retaining wall and sufficient soft landscaping to allow for some flexibility in the detailed design of the retaining wall, and an acceptable appearance. It would also result in the proposed parking area on the site being on lower ground than the garden of 14-25 Purley Downs Road, thereby limiting impacts on amenity (for example vehicle headlights).

8.62 The submitted Landscaping Plan is acceptable in principle and a condition would be attached to require submission of details of species and densities of the proposed planting as well as submission of a Landscape Management Plan for the site.

Ecology

8.63 Local Plan policy DM27 and London Plan policy G6 seeks to protect and enhance biodiversity in the borough. A Preliminary Ecological Assessment (PEA) including a preliminary roost assessment and reptile survey has been submitted. Surveys were carried out on various dates in 2021 (with an additional 2023 bat survey, and with reference to earlier 2019 surveys); these provide the LPA with sufficient certainty over the likely impacts on ecology.

8.64 The site contains suitable habitat for the following protected species: roosting, commuting and foraging bats; foraging and nesting dormice; nesting birds; and foraging and hibernating for widespread species of reptile.

8.65 The bat survey confirms that the building is a non-breeding day roost for common pipistrelle bats. Bats were observed emerging from the building during the survey and common pipistrelles and soprano pipistrelles bats were observed flying in the vicinity

of the building and foraging on the site. A bat licence from Natural England is required before any work can be undertaken to demolish the building. A suitable condition would be attached.

- 8.66 The reptile survey explains that a total of 31 artificial refugia were laid in suitable reptile habitat on the 13th April 2021 and left for a settling period of 8 days and 7 visits were undertaken to determine the presence/likely absence of reptiles. No reptiles were recorded during any of the surveys, despite suitable habitat being present and surveys carried out during appropriate weather. It is therefore advised that no further surveys are required.
- 8.67 2 x non-native invasive plant species have been identified on the site and the PEA sets out the appropriate methods for removal; it will be conditioned that works will be undertaken in accordance with the PEA.
- 8.68 The PEA notes that the mature trees on the site have high ecological value and should be retained and protected where possible. In particular, there are 4 trees that have moderate or high bat roost suitability. These are identified as T31, G35, T45 and T47 in the Tree Report. Of these, 2 are to be retained (T31 and T47), however G35 and T45 are both proposed for removal for arboricultural reasons as both are category U trees. As outlined above, T45 has already been removed (approved under application ref: 21/04301/TRE) and the Council's Ecological Advisor has stated that in order to mitigate the loss of this tree (and potential bat roosting space), alternative provision of 4 external bat boxes should be installed in suitable locations on retained trees, positioned at least 4m in height. This will be required by condition as part of the Biodiversity Enhancement Strategy.
- 8.69 With regard to the Ash Tree within G35 that was identified as having 'moderate' potential for bat roosting in the 2021 surveys, an additional survey was undertaken on 10/06/23. This found that one of the woodpecker holes initially observed as a potential bat roost was cobwebbed over, indicating that it has not been used by bats in the recent past. The second woodpecker hole was found to extend completely through the tree and not lead to an obvious cavity and is therefore bright and exposed, indicating that this hole also had not been used for bat roosting in the recent past. The tree has therefore been downgraded to 'low' bat roosting potential. This is accepted by the Council's Ecologist. Its removal is therefore acceptable in both arboricultural and ecological terms. Felling should be 'soft felling', details of which will be required within a Construction Environment Management Plan (CEMP: Biodiversity), secured by condition.
- 8.70 London Plan policy G6 also requires developments to secure a net biodiversity gain. A series of enhancement measures are proposed including use of species rich seed mix for lawns to increase plant diversity on site; planting to enhance the ecological value of the site; grass appropriate for reptiles; lighting restrictions for bats; new bird boxes and invertebrate boxes; insect hotels and new hedgerows. In addition, the inclusion of log piles, gaps in fencing / walls for hedgehogs and provision of green / brown roofs and walls, i.e. on external bin stores / cycle sheds could also be included. Inclusion of these measures would be required by condition.
- 8.71 Discussion with the Council's ecologist has taken place throughout the assessment of the scheme and no objection is raised subject to conditions requiring compliance with the Preliminary Ecological Assessment, Bat Survey and Reptile Survey; submission of a Construction Environmental Management Plan for Biodiversity (CEMP); details of

the appropriate bat license; details of wildlife-sensitive lighting; and a Biodiversity Enhancement Strategy.

Access, parking and highway impacts

Public Transport accessibility and parking provision

- 8.72 Transport for London published a methodology for calculating Public Transport Accessibility Levels (PTALs) which are a detailed and accurate measure of the accessibility of a point to the public transport network, taking into account walk access time and service availability. TfL's Web-based Connectivity Assessment Toolkit (WebCAT) includes a map which shows PTALs across London within 100m "cells" which are a useful indicator of the site's PTAL, although not a specific calculation for each site. The online WebCAT assessment shows the PTAL as 1b (very low) however this does not take into account the presence of bus stops on Purley Oaks Road which are within the recommended 640m walking distance. The site is less than the recommended 960m walk from both Purley Oaks station and Sanderstead station, and there is a bus stop around 300m from the site which is served by the 359 bus to Purley. The applicant has therefore calculated a more accurate, bespoke PTAL for the site of 2. TFL have confirmed that the correct methodology has been used and discussion with the Council's Highway Officer has taken place. The LPA is satisfied that the site has a PTAL rating of 2 and the scheme has been assessed as such.
- 8.73 London Plan policy T6.1 states that in areas of PTAL 2 in outer London the maximum car parking provision should be up to 1 space per dwelling for 3+ bed units and up to 0.75 spaces per 1-2 bed dwellings. This would equate to a maximum of 28.5 (29) car parking spaces for the site. The proposal is for 29 car parking spaces on site including 3 x disabled spaces and 1 x car club space. This is an acceptable level of parking provision on the site.
- 8.74 It is not anticipated that the scheme would result in and significant overspill car parking onto the local roads, given that the maximum provision is provided on site, however a parking survey has been submitted for completeness. The survey was undertaken within 200m of the site overnight on 02/11/21 and 03/11/21 and found that there were 15 cars parked overnight on both nights and a total capacity for 185 cars, which results in a parking stress of 8%, which is low. There would therefore be capacity for visitors to park on the street if necessary.
- 8.75 The car park is located on the south side of the site, adjacent to the retaining wall separating the site from the block at 14-25 Purley Downs Road. This location is the least visible from either street frontage, whilst also allowing use of the existing vehicle entrance point on Beech Avenue, and soft landscaping is proposed to form a buffer between the parking area and 14-25 Purley Downs Road. Swept path manoeuvres for the car parking spaces are provided within Appendix G of the Transport Statement, demonstrating that the spaces can be accessed by a large car. Trees and planting are proposed at regular intervals within the parking area to break up the area of hardstanding.
- 8.76 In comparison, the fallback scheme that was allowed at appeal (application ref: 20/00558/FUL) proposes underground car parking which is considered to be an over-engineered solution for this site and also raised concerns regarding impacts on tree roots due to the significant amount of excavation that would be required. The proposed

surface level car parking at the rear, as currently proposed, is considered to be preferable.

- 8.77 Local plan policy DM30 requires provision of a minimum of 1 car club space to be provided on site with major residential applications. The car club space is proposed in parking space number 1, closest to the vehicular access point, so it could be used by residents and others. A letter has been provided from Hiyacar indicating their willingness to provide a Hiyacar fleet car on the site. This is supported by the Council. The provision of the car club space will provide an option for residents who use public transport and only require occasional car use, meaning that overspill parking onto the public highway would be kept to a minimum. The provision of the car club vehicle and car-club membership for all residents will be secured within the s.106 agreement, with a clause requiring a financial contribution allowing the Council to pay for a car club vehicle in the vicinity (or other suitable mitigation) in event that there are no willing operators at the time the development is completed.
- 8.78 The 3 blue badge spaces are located towards the centre of the site, on the south side closest to the front doors of the blocks. London Plan policy T6.1(G) would require provision of 3% disabled parking spaces plus identifying potential provision of a further 7%. The proposal includes 10% (3 spaces) blue badge spaces for the 3 x M4(3) dwellings. The layout of these spaces would comply with the Building Regulations requirements. A number of Electric Vehicle Charging points are also shown on the plans. This is welcomed in accordance with London Plan policy T6.1(C) and final details of EVCPs are now secured through Building Regulations.
- 8.79 A S106 contribution would also be sought towards sustainable transport initiatives in the locality in accordance with Local Plan policy SP8.

Access and movement around the site

- 8.80 The proposal is to re-use the existing access point on Beech Avenue. The access point would be widened to 5.5m in total and straightened to allow cars to pass each other safely at the entrance, as demonstrated in the drawing in Appendix E of the Transport Statement. The correct pedestrian sightlines of 1.5m x 1.5m are shown on the site plan at the site entrance and there are no obstructions within these sightlines. Vehicular sightlines of 2.5m x 25m are also shown correctly for the 20mph road (Appendix F of the Transport Statement). A S278 Agreement would be agreed for all changes to the public highway.
- 8.81 A series of pedestrian paths are proposed around the site and their layout has been well considered throughout the design process and pre-application discussions. There are pedestrian entrances to the site on both Beech Avenue and Purley Downs Road. The main entrances to both buildings are from the central courtyard area and there is a secondary entrance to Block 2 on the Purley Downs Road side. Ground floor units have their own front doors, which are also accessed in a legible manner from the paths and have buffer planting adjacent. Paths are also provided from the car parking spaces to the homes. Pedestrian movement around the site is step-free and is considered to be acceptable.

Deliveries and servicing

- 8.82 Delivery and servicing vehicles will be able to access the site via Beech Avenue. A servicing bay is proposed outside building 1 which will allow larger vehicles to carry

out deliveries and collections. Swept path manoeuvres for a 10m rigid vehicle are shown in appendix H of the Transport Statement demonstrating that the vehicle can enter and exit in forward gear, utilising the turning space at the eastern corner of the site.

Refuse storage

- 8.83 Local Plan Policy DM13 requires the design of refuse and recycling facilities to be treated as an integral element of the overall design. Each block would have an internal bin store at ground floor level. The bins can be collected directly from the bin store of building 1, with the collection vehicle stopping in the servicing bay (directly outside). Bins from building 2 would be taken to the bin collection point by a management company (as clarified within the submitted Waste Strategy) adjacent to Purley Downs Road, from where they would be collected. The drag distance for the Council's waste collection operatives would be well below the recommended maximum 20m. A new dropped kerb would be required on Purley Downs Road to allow the bins to be dragged to the vehicle. This would be agreed as part of the S278 agreement.
- 8.84 In terms of bin capacity, the Council's online waste calculator estimates that the proposed unit mix would generate the following amount of waste per week: 4,530ltr general waste; 3,968ltr mixed recycling; and 372ltr food recycling. The 2 bin stores have space for a total of 10 x 1100L bins, which is sufficient. A compliance condition will be attached as well as a standard informative requiring the applicant to contact the waste and recycling team at least 1 month prior to occupation.
- 8.85 A space for the occasional collection of bulky waste is proposed near the main entrance point on Beech Avenue in accordance with Local Plan policy DM13.1, with access via a 2m wide path.

Cycle parking

- 8.86 London Plan policy T5 would require provision of a total of 61 cycle parking spaces for the proposed unit mix. Block 2 is proposed to have an internal cycle store accessed directly from the outside of the building. It would have space for 30 bikes, (4 bikes on Sheffield stands and 26 bikes on 2-tier stands). The appropriate spacing between stands within the bike store has been provided and the layout is acceptable. Block 1 would be served by 2 external cycle stores, 1 of which would be located in the central courtyard between the 2 blocks and 1 towards the southeastern corner of the site. These external stores would provide storage for a total of 35 bikes (13 bikes on Sheffield stands and 22 bikes on 2-tier stands). A total of 65 bicycle parking spaces are proposed for residents, with complies with London Plan standards.
- 8.87 London Plan policy T5 requires development proposals to demonstrate how cycle parking facilities would cater for larger cycles, including adapted cycles for disabled people. The cycle store within the central courtyard provides space for 3 x wider or adapted bikes on well-spaced Sheffield stands. These could be utilised and easily accessed by the occupiers of the ground floor M4(3) units within block 1, or by other users with adapted or wider cycles.
- 8.88 In addition, policy T5 would require provision of at least 2 visitor cycle parking spaces. 4 spaces are proposed on 2 sheffield stands, in a well-overlooked located within the central courtyard.

8.89 At this stage, details are not provided of the appearance of the external cycle store enclosures, however the Council is satisfied that adequate cycle storage can be provided so details of the enclosures can be secured by condition.

8.90 Travel Plan

8.91 A draft residential travel plan has been provided outlining the proposed management plan for achieving sustainable and active travel objectives in the long term. A range of initiatives are outlined which seek to reduce the number of vehicular trips to and from the site and to increase sustainable travel mode choices. These include, for example, provision of cycle parking, EVCPs on site and an on-site car club bay, as well as initiatives such as Travel Information Packs for residents. A plan for monitoring is also set out. Details are supported by the Council's Sustainable Travel & Transport Planning Officer. The final version of the Travel Plan and ongoing monitoring would need to be secured as part of the S106 agreement.

Flood risk

8.92 London Plan policy SI13 requires developments to achieve greenfield runoff rates and to manage surface water as close to source as possible by following the drainage hierarchy. Local Plan policies SP6 and DM25 require all developments to incorporate SUDS to reduce surface water runoff and provide water treatment on site. The site is within flood zone 1, at very low risk of surface water flooding. The underlying bedrock is chalk and the existing site has a well-functioning soakaway, suggesting good permeability.

8.93 The surface water drainage proposal is for 3 soakaways to be located on the north and east side of the site, below the car parking area, away from tree roots. The 3 soakaways are proposed to be linked together to form a cascade from the highest to the lowest level of the site. If an alternative outfall is required, Thames Water has confirmed that a surface water connection can be made to the public foul water sewer at a rate of 1.5 l/s for all events up to and including the 1 in 100 year plus climate change event.

8.94 Permeable hardstanding is proposed which would naturally slow down the rate of runoff, and this plus the filter drainage running through the soakaways would provide water quality benefits to the runoff prior to discharge to the ground.

8.95 The LLFA has been consulted and have no objection to the drainage strategy proposed. They have requested by condition details of existing runoff rates and post-development discharge rates to be provided for all scenarios including the 1 in 1 year, 1 in 30 year, 1 in 100-year storm events and post development discharge rates during 1 in 1 year, 1 in 30 year, 1 in 100 year, 1 in 100 year + Climate change storm events. They have also requested further infiltration test data, in accordance with BRE365, to be provided to suit the proposed location and depth of all infiltration features. An appropriate condition will be attached.

Sustainability

Energy efficiency

8.96 London Plan policy SI2 and Local Plan policy SP6 require major developments to be zero carbon by reducing greenhouse gas emissions in accordance with the energy hierarchy. An Energy and Sustainability Statement has been submitted outlining that

the scheme would be able to achieve a 71.29% improvement in CO2 emissions compared to a 2021 Building Regulations compliant scheme using various carbon reduction features. The proposed carbon reduction features include passive and active design measures and low and zero carbon (LZC) technologies and have been proposed in accordance the Energy Hierarchy (Be Lean, Be Clean, Be Green, Be Seen).

- 8.97 The proposed energy strategy includes: the use of advanced heating controls; Mechanical Ventilation with Heat Recovery (MVHR); additional mechanical purge ventilation within certain occupied rooms; enhanced building fabric; 100% low energy lighting; enhanced thermal bridging and air tightness values; communal heating system; Air Source Heat Pumps to provide heating and hot water as part of a communal heating system; and a proposed 13.8kWp PV array.
- 8.98 The remaining carbon would be offset by way of a financial contribution of £23,940 which would be secured as part of the S106 agreement (8.40 tonnes x £95 x 30 years = £23,940). The Council's Sustainable Development & Energy Officer has confirmed that the Energy Strategy is compliant with regulations and that the carbon offset payment has been calculated correctly.
- 8.99 Local Plan policy SP6 requires major residential schemes of over 20 units to incorporate site wide communal heating systems. There is no district heat network in the vicinity however communal networks are proposed within the development. A communal heat pump is proposed to provide hot water as part of the wider energy strategy for the site, and a communal Air Source Heat Pump (ASHP) is proposed to provide heating to the development. The ASHP machinery would generate some noise so is proposed to be located close to the access road at the site entrance, away from residential occupiers (and subject to the aforementioned noise condition).
- 8.100 The Energy Statement refers to the Be Seen requirement for post-occupancy reporting of energy performance to the GLA. This is supported and would be secured through the S106 agreement.
- 8.101 By comparison, the fallback scheme approved at appeal (application ref: 20/00558/FUL) was assessed under the previous London Plan (2016) and proposed incorporation of energy efficient building fabric, an air source heat pump and solar panels. The carbon off-set contribution was calculated at £9,779 as the offsetting contribution were lower under the previous London Plan (£60 per tonne of carbon as opposed to £95 per tonne currently). The current proposed scheme offers greater on-site carbon reductions and a greater offsetting payment, which is preferable.

Water efficiency

- 8.102 London Plan Policy SI5 and Local Plan policy SP6 requires that Internal water use is restricted to <105 litres/person/day (excluding 5 litres/person/day for external use) in accordance with Building Regulations Part G. An indicative specification for meeting this requirement is proposed within the report. A condition would be attached requiring the proposed development to meet this minimum water efficiency standard.

Fire safety

- 8.103 London Plan policy D12 requires all development proposals to achieve the highest standards of fire safety. Part B of the policy requires that all major schemes are

accompanied by a Fire Statement produced by a suitably qualified Assessor. A Fire Statement prepared by a suitably qualified engineer at Solas Realta Fire Engineering has been submitted. The Statement sets out details in relation to means of warning and escape, control of fire spread internally and externally, and access and facilities for the fire service.

- 8.104 In terms of access, a fire engine would enter the site via the vehicle access point on Beech Avenue. In order to access block 2 within the requisite distances (18m), a dry riser inlet valve would need to be located either on the NE corner of block 2 or on the path leading from Purley Downs Road. All stairs will also include a dry riser in accordance with BS 9990 in order to ensure all areas on each floor are within 45m along a route suitable for laying hose from a dry riser outlet.
- 8.105 The Fire Statement has been reviewed by the Council's Building Control Officer. The Statement was found to be broadly acceptable subject to some amendments. Amendments to the drawings have been made including confirmation that fire evacuation lifts will be included and that the fabric surrounding the lift will provide the requisite fire insulation; inclusion of doors for emergency escape to external spaces (if required) from all habitable rooms (living rooms and bedrooms) of the ground floor M4(3) units; and the inclusion of a ventilation corridor to the refuse store. The updated drawings have been reviewed and deemed acceptable by the Council's Building Control Officer.
- 8.106 A pre-commencement condition will be attached to the permission to require submission of an updated version of the Fire Statement document to incorporate the changes already made to the drawings, so that it can be read as a standalone document. The applicant has agreed to this pre-commencement condition. In addition, the condition will require that all balconies will meet the combustibility requirements for a high rise building (as is already proposed for the external wall construction of the rest of the building), and the applicant has also agreed to this.

Air Quality

- 8.107 The whole borough is an Air Quality Management Area (AQMA) and Local Plan policy DM23 seeks to ensure that developments are air quality neutral and do not lead to further deterioration of existing poor air quality. An Air Quality Assessment has been submitted outlining that the proposed development aims to reduce on site NO₂ emissions in line with the London Plan Guidance on Air Quality.
- 8.108 To control the contaminant sources, Mechanical Ventilation with Heat Recovery (MVHR) systems are proposed to be installed within all units to maintain internal ventilation rates with filtered air, without the need for windows to be opened or background ventilators to be installed.
- 8.109 The building would achieve an 'Air Quality Neutral' result for building emissions, but not for transport emissions. To mitigate transport emissions, EV charging and cycling storage are proposed. The report has been reviewed and deemed acceptable by the Council's Pollution Control Officer.

Contaminated Land

- 8.110 Local Plan policy DM24 requires an assessment of land contamination and permits development on or near to potentially contaminated sites as long as detailed

site investigation is undertaken and remedial actions are proposed as necessary. A preliminary land contamination assessment for the site has been undertaken. Some potential sources of contamination are identified, and it is recommended that additional assessment is undertaken by way of an exploratory intrusive investigation. The Council's Pollution Control Officer has recommended that a condition is attached.

Conclusions

- 8.111 The proposed provision of 31 homes within 2 blocks on this large corner site is acceptable in principle and the proposed scheme is considered to be an improvement on the fallback scheme that was allowed at appeal (application ref: 20/00558/FUL). A policy compliant level of affordable housing is proposed in the form of 6 x First Homes. The site layout, design and scale of the proposed buildings responds appropriately to the character of the area and the scale of the immediately surrounding built form. Trees would be retained on the site boundaries, and proposed tree removals on the site would be mitigated by replacement planting. No amenity impacts on neighbouring occupiers are identified. The proposed development would provide a high quality of accommodation internally and externally for future occupiers, complying with all of the standards. A policy compliant level of on-site car parking and cycle parking is proposed, and the arrangements for servicing and refuse collection are acceptable. The provision of an on-site car club bay for use by residents and others is supported. No impacts on the highway network or highway safety have been identified. Impacts on ecology, flood risk and sustainability have also been found to be acceptable.
- 8.112 All other relevant policies and considerations, including the statutory duties set out in the Equalities Act 2010, the Human Rights Act, the Planning and Compulsory Purchase Act, and the Town and Country Planning Act, have been taken into account.
- 8.113 Given the consistency of the scheme with the Development Plan and weighing this against all other material planning considerations, including the benefits and the harm outlined within this report, the proposal is considered to be acceptable in planning terms subject to the detailed recommendation set out in section 2 (RECOMMENDATION).