

Application No. 20/01299/FUL - 44 Sanderstead Hill, South Croydon, CR2 0HA

1. SUMMARY

1.1 This report concerns an:
Application for full planning permission for:

Demolition of an existing dwelling and erection of a new building to provide 9 residential units together with associated works, access, cycle and refuse storage, parking and landscaping

2. DECISION

Permission Refused Reason(s) for refusal :-

1 The proposed development, by reason of its generic design, vertical nature and lack of contextual character analysis would result in a form of development that would appear out of character with the neighbouring properties to the detriment of the streetscene and the general character and appearance of the area. As such, the proposal would be contrary to Policies 7.4, and 7.6 of the London Plan (2016), Policies SP4 and DM10 of the Croydon Local Plan (2018) and the Croydon Suburban Design Guide (2019).

2 The proposed development, by reason of the absence of a lift and therefore the inability to provide accessible step free access to the front door all units in line M4(2): Accessible and Adaptable dwellings requirements, would not contribute to sustainable communities within the borough as the accommodation would not be accessible to a variety of users and occupiers. As such, the proposal would be contrary to Policy 3.8 of the London Plan (2016) and Policy SP2 of the Croydon Local Plan (2018).

In reaching this decision the Local Planning Authority has sought to work in a positive and pro-active manner based on seeking solutions to problems in the following way:

To assist applicants the Local Planning Authority has produced policies and written guidance, all of which is available on the Council's website and offers a pre planning application advice service. In this instance the pre application advice was not adhered to. The Council is ready to enter into discussions with the applicants to assist in the preparation of a new planning application. The Local Planning Authority delivered the decision in a timely manner.

Informative(s):

1 IMPORTANT ADVICE RELATING TO THIS APPLICATION IN THE EVENT OF AN APPEAL AGAINST THE COUNCIL'S DECISION

Community Infrastructure Levy.

A. You are advised that under the Community Infrastructure Levy Regulations 2010 on commencement of the development a financial payment will be required to Croydon Council and the Mayor of London. The payment to the Mayor of London will be forwarded by Croydon Council.

B. A separate Liability Notice will be issued to any person who has assumed liability for the payment. If no person or body has already assumed liability then within 14 days of an appeal being allowed the names and addresses of the person(s) responsible for the CIL payment should be forwarded to the Council using the agreed forms which can be obtained from the planning portal from the link below.

www.planningportal.gov.uk/planning/applications/howtoapply/whattosubmit/cil

C. If no person or body has assumed liability, payment will be required from the owner of the land at the time of commencement of works. It should be noted that for the purpose of the above regulations commencement of the development will comprise any works of demolition necessary to implement the planning permission.

D. For further information please visit the Croydon Council's website at:
www.croydon.gov.uk/cil

Officer Report:

3. BACKGROUND

(a) Proposal

- 3.1 The proposal is for the demolition of the property and the garage on the site and the erection of a new building comprising 9 flats. The new building would be arranged over 4 floors comprising ground, first, second and roofspace accommodation. The topography of the site slopes upwards from the front to the back by approximately 3m and also from the south east to the north west along the Sanderstead Hill frontage by approximately 2m. An element of excavation at the rear is therefore required to accommodate the building. The building line at the front is broadly the same as the positioning of the existing dwelling, in line with the neighbouring properties, and extends an additional 6.5m to 9.6m to the rear.
- 3.2 The proposed mix of units is for 4 x 3b4p, 1 x 2b3p and 4 x 1b2p. Private and communal amenity space is proposed, along with playspace. 6 on-site car parking spaces are proposed, cycle storage is located in the rear garden and refuse storage is located in the front garden. There are a number of trees on the boundaries of the site, some of which would be retained and some removed. New planting and landscaping is proposed. The rear garden is accessed via steps from the ground floor access core and also externally around the northwest side of the building via a graded path of approximately 1:21 gradient.

(b) Site Description

- 3.3 The site comprises a 2 storey detached property on the south west side of Sanderstead Hill. The property is of a traditional suburban character with bay windows,

a hipped roof and tile hanging detail. There is forecourt parking at the front along with landscaping and a brick wall to the front of the site. It has an attached double garage which adjoins the boundary with 46 Sanderstead Hill and a conservatory at the rear. The site adjoins the gardens of 149-153 Purley Downs Road to the rear.

- 3.4 The surrounding suburban character comprises predominantly two storey detached properties on large plots with traditional architectural styles, materials and roof forms. The area is verdant and spacious with a wide road, grass verges, and street trees. Sanderstead Hill slopes downwards in a north westerly direction.
- 3.5 There are a number of trees on the site, particularly along the rear boundary, with planting in the front garden. None of the trees are protected by a TPO. The site itself is at low risk of surface water flooding but Sanderstead Road is at high risk of surface water flooding. It has a PTAL rating of 1b which indicates a very low public transport accessibility level. The site is not in a conservation area and there are no heritage assets immediately adjacent.

(c) Relevant Planning History

- 3.6 06/03483/P: Erection of conservatory to rear – granted 22.09.2006
- 3.7 11/00875/P: Alterations; erection of first floor side extension – granted 16.05.2011 (not implemented)

4 CONSULTATIONS

- 4.1 Letters were sent to 14 neighbours on 14/04/20 and a re-consultation was carried out between 15/10/20 and 31/10/20 on: revised plans including new elevation long section and street scene perspectives; a character analysis to expand on the design rationale for the proposal; updated Arboricultural Report; Transport Statement Addendum; and Preliminary Ecological Appraisal and Bat Emergence Survey.
- 4.2 297 individual responses have been received from neighbouring properties, including one from the Sanderstead Residents Association. In addition, Cllr Tim Pollard referred the application to committee if recommended for approval. The following material planning considerations have been raised:

Objection	Officer comment
<i>Design and appearance</i>	
Overdevelopment. Would appear obtrusive in the streetscene due to large footprint and mass. Does not follow building lines at front and rear. Too close to the boundary	Addressed in paragraphs 5.4 to 5.10 of this report
Out of keeping with surrounding 2 storey detached and semi detached family homes	
Building appears higher due to its location on the hill and would appear overbearing	

to both neighbours and properties lower down the hill. Lack of analysis of topography.	
Type of development / new builds are not in keeping with the area	
Poor design. Inappropriate materials. Unsympathetic style	
The character appraisal is selective / misleading.	
<i>Highway safety/impacts</i>	
Only 6 parking spaces will mean more parking on an already road which raises safety concerns for road users, pedestrians, other cars pulling out of driveways and the 403 bus which travels down this road	Addressed in paragraphs 5.21 to 5.26 of this report
Development will generate extra traffic	
There have been car accidents at this point of the hill including a car crashing into the garden of the property	
All new build car parking spaces should have EV charging points	
Cycling in this area is impractical due to hills. A count of cycles parked at Sanderstead railway station shows that only 2 bikes are ever left there	Provision of cycle parking is a policy requirement and is useful in encouraging sustainable modes of travel.
<i>Amenity impacts</i>	
Loss of privacy, overlooking and impacts on daylight to neighbouring properties due to windows and balconies and removal of trees on the boundaries (42, 46 and 48 Sanderstead Hill and Purley Downs Road)	Addressed in paragraphs 5.17 to 5.20 of this report
Breaches the 45 degree rule on one side.	
Increased noise from additional residents and from use of the bike shed and communal garden	
<i>Type / quality of accommodation</i>	
Oversaturation of flats and empty flats in the area. Need more family homes. Inappropriate intensification	The provision of flats in suburban locations helps to provide housing choice and sustainable communities in line with policy DM1
There is not disabled access to all flats and no disabled parking space	Addressed in paragraph 5.13 of this report

<i>Trees and biodiversity</i>	
Removal of trees will impact wildlife and ecology – foxes, badgers, bats and birds including peregrine falcons have been sighted in the area	Addressed in paragraphs 5.30 to 5.34 of this report
Loss of trees and only 2 new ones	
Loss of soft landscaping to create the driveway is unacceptable	
Removal of 1 tree at back left of garden will leave 2 unsupported trees.	
Updated arboricultural report does not confirm that the copper beech tree in no. 42 and its roots will be protected.	
<i>Refuse store</i>	
Waste requirements have been underestimated	Provision is in line with the New Builds and Conversions Waste Management Guidance
Location of the refuse store not supported by neighbour.	There are not considered to be amenity impacts from its proposed location.
Narrow entrance to driveway could be obstructed by bins on collection day	The driveway entrance will be 5m wide. Waste would be collected from the bin store.
<i>Policy</i>	
Density would exceed those set out in policy	Density would be approximately 260hr/ha which is above the guideline for a low PTAL location set out in London Plan policy 3.4. It should be noted that flexibility is permitted and density targets have been removed from the draft new London Plan. Local policy supports suburban intensification.
No social housing provided	Affordable housing is not required by policy on sites of less than 10 units.
Loss of family housing	4 x family units are re-provided
Does not comply with the vision for Sanderstead set out in the Local Plan	The vision for Sanderstead identifies opportunities for provision of windfall housing development
<i>Other</i>	

Cumulative impact on local infrastructure - schools, doctors, bus and trains in Sanderstead	The development would be liable to contribute to the Community Infrastructure Levy (CIL)
Noise and dust from construction. No mention of a Construction management Plan	Construction impacts are not a material planning consideration. Works would be undertaken in line with Croydon's Construction Code of Practice
Could set a precedent for other properties on Sanderstead Hill	Each application is assessed on its own merits
Restrictive covenant on the land requires detached and semi detached dwellings	This is not a planning consideration
Close to the historic Gruffy landmark at the top of Sanderstead Hill	This would be unaffected.
Development should take place on brownfield land first	Suburban intensification is supported by policy.
The recent pandemic has shown that people want houses with gardens, not flats	Flats make an important contribution to the housing mix and sustainable communities
<i>Procedural</i>	
42 Sanderstead Hill queried why they were not informed.	Letters were sent to this address on 14/04/20 and 14.10/20. Repls were received on 16/04/20, 17/04/20, 18/04/20, 21/04/20, 12/05/20 and 25/10/20 and have been reviewed accordingly.
Drawings are marked as 'preliminary' and could be subject to change. PL10B shows an increase in the outline of the neighbouring house No 46. Why is this?	The submitted drawings are the ones being assessed and would be considered the 'final' planning drawings. This discrepancy in the outline of no.46 s noted; it is shown to be larger in the Rev B street scene elevation. The applicant would be required to clarify this if the application were recommended for approval.

4.3 The Sanderstead Residents Association has objected to the proposal on the following grounds:

- ☐ Inappropriate within the streetscene which comprises well spaces properties; too close to boundary with number 46 and the height of the building relative to 42 is disproportionate.
- ☐ Overlooking and dominance from windows on side elevations. Should be high level windows fixed shut.

- ☐ Overlooking impacts from balconies to flats 3, 4 and 6 which are not screened and allow overlooking of the gardens to 42 and 46. Screening walls of other balconies are unclear. The large balcony to first floor flat only shows a screen wall to approximately 1.5m which could allow overlooking. A large balcony could also be used for parties.
- ☐ Refuse storage is not integral, nor screened.
- ☐ Inadequate car parking
- ☐ A large number of mature trees are being removed. The trees to rear gardens across the area form an intrinsic part of the established character and have carbon reduction benefits.
- ☐ No lift is provided so flats are not M4(2) compliant and will be difficult for families with prams etc to access the family units.
- ☐ The common staircase should meet Building Regulations for Park K which restricts risers to 12 between landings which the proposal does not achieve.

4.4 Cllr Tim Pollard has objected to the proposal on the following grounds:

- ☐ Loss of bat habitat
- ☐ Road safety concerns given the location at an accident hotspot
- ☐ Insufficient parking on site
- ☐ Loss of privacy to neighbours and to residents in Purley Downs Road

5 CONSIDERATIONS

5.1 The principle planning considerations are:

- ☐ Principle of development
- ☐ Impacts on the character and appearance of the site and surrounding area
- ☐ Quality and mix of accommodation
- ☐ Amenity impacts on neighbouring properties
- ☐ Transport and highways impacts
- ☐ Impact on trees and landscape
- ☐ Ecology impacts
- ☐ Sustainability and flooding impacts

Principle of development

5.2 Chapter 6 of the National Planning Policy Framework (NPPF) indicates that housing applications should be considered in the context of a presumption in favour of sustainable development and that is the role of local planning authorities to deliver a wide choice of high quality homes. Policy 3.3 of the London Plan (2016) recognises the pressing need for more homes in London.

5.3 Policy SP2 of the Croydon Local Plan (2018) states that the Council will apply a presumption in favour of development of new homes provided applications for residential development meet the requirements of other applicable policies. It seeks to deliver 10,060 homes across the borough on windfall sites by 2036. Guidance on the Council's approach to suburban intensification is provided in the Suburban Design Guide SPD (2019). The principle of redevelopment of this site for higher density residential development is supported in principle subject to material considerations discussed below.

Impacts on the character and appearance of the site and surrounding area

- 5.4 Chapter 12 of NPPF and Policy 3.5 of the London Plan require housing development to enhance the quality of local places, taking into account physical context; local character; density; tenure and land use mix; and relationships with, and provision of, public, communal and open spaces. Policy SP4.1 and DM10.1 of the Croydon Local Plan require development to be of a high quality, which respects and enhances Croydon's varied local character and contributes positively to public realm, landscape and townscape to create sustainable communities. Proposals should 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.
- 5.5 In terms of scale and massing, the proposed development is of three storeys plus accommodation in the roofspace, providing four floors of residential accommodation. This complies with guidance in the Suburban Design Guide (SDG) SPD which seeks to achieve developments of three storeys with an additional floor contained within the roof space in areas such as this where the surrounding dwellings are predominantly detached dwellings of two or more storeys.
- 5.6 The front building line is line with the neighbouring properties and in broadly the same location as the existing dwelling. The building has a massing which steps away from the site boundaries at the rear, with the maximum extent of the rear projection being between 6.5m and 9.6m beyond the rear elevation of the existing dwelling. The proposed massing does not encroach on the 45 degree line in plan or elevation, indicating that the massing is appropriate to protect the amenity of neighbouring occupiers. This is discussed in greater detail in paragraphs 5.17-5.20. There is a separation distance of between 1.2m and 1.6m from the side elevation of the proposed building to the site boundary on the south (adjacent to 46 Sanderstead Hill) and a distance of between 3.6m and 6.8m from the side elevation to the site boundary on the north (adjacent to 42 Sanderstead Hill). This complies with guidance in the Suburban Design Guide SPD and also leaves space for retention of existing trees and new boundary planting. The proposed height, massing and positioning of the building is considered to be broadly acceptable.
- 5.7 In terms of the appearance of the building, a basic character analysis has been provided however the lack of detail in this analysis means that the proposed architectural expression and materiality of the building is considered to be weak. The character analysis highlights the gable roofs that influence the proposed massing, however more detail is required over a broad range of scales such as the location in the borough, the site's heritage and landscape features, townscape and pattern of development, local architecture, and common building features. The applicant should select examples that positively contribute to character and the critical analysis of these should be demonstrated and then applied to the proposed development. The applicant should show that the proposal's proportions (including the eaves/ridge line and roof pitch) are in keeping with surrounding character. The contextual elevations provided show that the proportions of the proposal are very different to its immediate neighbours which are buildings that are very horizontal in nature, whereas the proposed building is very vertical. The vertical nature of the building is emphasised by the proposed gable

roof and the way the materials are applied to the building. The building is considered to contrast unsuccessfully with its immediate neighbours.

- 5.8 Studies of the architecture along Sanderstead Hill should also be undertaken to assess the common architectural proportions, style, and detailing. This analysis should then clearly inform the proposed architecture, especially proposed openings within the façade. Details of sill/head details should also be provided; we would expect to see 225mm window reveals to give depth to facades. The windows sizes, proportions and arrangement are generic and not informed by local character (which comprises bay windows and dormer windows with hipped roofs), and the choice of materials and detailing also needs to be informed by critical character analysis. The proposed materials are brick, hung tiles and some render and whilst it is recognised that these materials feature in the surrounding area, there is no justification provided for the choice of brick tone or type or the expanse of brick used.
- 5.9 Therefore the proposal appears too generic and not in keeping with the character of the area due to, amongst other reasons, an insufficient analysis of the local character of the area. The proposed building, with its vertical emphasis and generic design, does not sit well with the proportions of its neighbouring buildings or the streetscene. It is therefore considered to be harmful to local character which would be contrary to policies DM10.1 and DM10.7 of the Local Plan. The application is recommended for refusal on these grounds.
- 5.10 With regards to the wider site layout, it is proposed that car parking for 6 spaces is located on the front forecourt. Two new trees are provided in the forecourt and some buffer planting is proposed along the site boundaries and between the parking area and the building. At the front, the proposed low wall is greened and consistent with surrounding boundary conditions. A pedestrian route separate to the vehicular entrance is provided to the front of the building. The path continues around the north side of the building to provide step free access to the rear communal garden and the cycle store along a path which is graded at a 1:21 gradient. This step free access is welcomed. There is a side access gate to provide adequate security. The rear communal garden can also be accessed through the centre of the building via steps at the rear.

Quality and mix of accommodation

- 5.11 Policy SP2.7 of the Local Plan states that the Council will seek to ensure that a choice of homes is available in the borough that will address the borough's need for homes of different sizes, particularly for small family units. The Council strategic target for 30% of all new homes to have three or more bedrooms. The proposal is for 4 x 3b4p, 1 x 2b3p and 4 x 1b2p, which complies with policy SP2.7.
- 5.12 Policy 3.5 of the 2016 London Plan states that housing developments should be of the highest quality, internally, externally and in relation to their context and to the wider environment. The design of all new housing should enhance the quality of local places, taking into account physical context and local character. Policy 3.5 sets out minimum GIA standards for new residential developments. All proposed flats meet the space

standards and all are dual aspect. All side facing windows are obscured but all habitable rooms have additional front or rear facing windows so would receive sufficient light. The ground floor side facing windows on the north side would have outlook onto the path which leads to the rear garden so the obscured glazing and the buffer planting which is proposed outside these windows is supported here to ensure privacy. The top floor units within the roof space have at least 75% of their internal areas with head heights of at least 2.3m. The communal core has a window at the front to provide light and ventilation. At the ground floor level, access is provided directly from the core to the rear garden via a set of steps. Internal layouts are considered acceptable.

- 5.13 Policy 3.8 of the London Plan, the London Housing SPG (2015) and emerging London Plan policy D7 state that 90% of new-build housing should meet Building Regulation requirement M4(2) 'Accessible and Adaptable Dwellings' with the remaining 10% meeting Building Regulation requirement M4(3) 'Wheelchair User Dwellings'. Flat 2 on the ground floor is the M4(3) unit with access to a private rear courtyard and step free access to the communal space via the ramp. However, importantly, no lift is proposed within the scheme. In order for dwellings to comply with M4(2) requirements it is necessary for step free access to be provided to front doors, as well as the amenities of the scheme. The absence of a lift is therefore contrary to London Plan policy 3.8 and will be a reason for refusal of the scheme.
- 5.14 Policy DM10.4 requires all proposals for new residential development to provide private amenity space that is of high quality design, enhances and respects the local character, and is functional. Private amenity space is provided for each flat in the form of balconies for upper floor flats and private garden areas for the ground floor flats, which is welcomed. The land slopes upwards towards the rear so an element of excavation to a maximum depth of around 1.7m would be required to accommodate the larger building and the rear private amenity spaces for the ground floor flats. The retaining wall would be tiered upwards towards the communal garden, respecting the 25 degree line from the ground floor rear windows, therefore providing sheltered amenity space for the ground floor flats whilst also ensuring that sufficient light can enter the flats. This arrangement is considered to be acceptable.
- 5.15 Policy DM10.5 requires provision of high quality communal outdoor amenity space in all flatted developments that is flexible, multifunctional, accessible and inclusive. Communal amenity space of 430sqm is provided to the rear and is accessed both from the communal core within the building and via a 1.3m wide path to the north of the site which has a 1:21 gradient.
- 5.16 Policy DM10.4 also requires provision of a minimum of 10sqm per child of new play space, calculated using the Mayor of London's population yield calculator in all flatted developments. A small area of children's play space is proposed in the rear garden.

Amenity impacts on neighbouring properties

- 5.17 Policy DM10.6 of the Croydon Local Plan states the development should protect the amenity of the occupiers of adjoining buildings, should not result in direct overlooking

of habitable rooms or private outdoor space, provide adequate sunlight and daylight to potential future occupants and should not result in significant loss of existing sunlight or daylight levels of adjoining occupiers.

- 5.18 The proposed massing does not breach the 45 degree line in plan or elevation and is set back from the side boundaries on either side with the existing boundary fencing to be retained. The development is therefore not considered to have an overbearing impact on either of its neighbours or impact upon their outlook. Concerns have been raised about the impact of the proposal on daylight and sunlight levels reaching properties down Sanderstead hill. The proposed building is not of a scale that would lead to overshadowing impacts on rear gardens further down the hill to the north west.
- 5.19 Neither 46 Sanderstead Hill to the south nor 42 Sanderstead Hill to the north have any side facing windows. It is noted that number 46 has 2 side facing rooflight windows which would not be affected. All side facing windows within the new building are proposed to be obscure glazed, so no amenity concerns are raised in terms of impacts on privacy. To the rear, the site adjoins the rear gardens of 149-153 Purley Downs Road and concerns have been raised about amenity impacts on these properties due to noise from the rear garden. The properties themselves are located around 20m away from the rear boundary of the site and the use of the back garden will not be materially different to the existing situation so no amenity concerns are raised.
- 5.20 The proposed building would have rear facing balconies at first, second and roof level. The balconies in the centre of the building (flats 3 and 4 on the first floor and flat 6 on the second floor) are proposed to be projecting balconies, whereas all other balconies (second balconies for flats 3, 4, plus balconies for flats 5, 7, 8 and 9) are inset. There are trees on both boundaries which would be retained and would provide an element of screening, however the projecting balconies at first and second floor level could raise amenity concerns in terms of overlooking into neighbouring gardens. It would be necessary for well designed screening to be used on the sides of the balconies to avoid overlooking into the first half (at least 10m) of each neighbouring properties. It would be preferable if these were inset similar to other balconies. This could be addressed in a revised design.

Transport and highways impacts

Car parking

- 5.21 Policy DM30 of the Croydon Local Plan seeks to ensure that there is an appropriate level of car parking. The Public Transport Accessibility Level (PTAL) rating is 1b which indicates poor accessibility to public transport. The site is not located in a controlled parking zone. The London Plan and Policy DM30 set out maximum car parking standards for residential developments based on public transport accessibility levels and local character. 1 and 2 bedroom units should provide less than 1 space per unit and 3 bedroom units up to 1.5 spaces per unit. In line with the London Plan, the proposed development could therefore provide up to a maximum of 11 spaces. It is however not necessarily desirable to provide car parking up to the maximum standards given the requirements of both the London Plan and Croydon Local Plan which seek to

reduce reliance on car usage and promote sustainable modes of transport. As such, a lower level of car parking can be supported and is encouraged in line with the ambitions of the Development Plan.

- 5.22 6 on site vehicle parking spaces are proposed including an accessible space. While the low PTAL is acknowledged and a greater parking demand is likely, the proposed scheme would provide 55% parking provision of the maximum 11 spaces permitted on site. To inform the Transport Assessment, a car parking beat survey utilising the Lambeth Methodology has been undertaken to determine the level of on street car parking capacity and whether the likely car parking demand could be suitably accommodated in neighbouring streets. The survey assessed parking spaces within 200 metres of the application site, in line with the methodology, which covered Sanderstead Hill, Purley Downs Road, Sundown Avenue and Ownstead Gardens. The average parking stress is shown to be 19% which is low and indicates that there is sufficient capacity within a 200 metre radius of the site to accommodate the shortfall of 5 overspill vehicle parking spaces.
- 5.23 Policy SP8 and DM29 seeks to manage use of the private car and promote sustainable travel. DM30 requires a car club space to be provided on minor residential schemes, where there is likely to be interest from an operator. Whilst there is sufficient parking on site and on street to ensure that the impact on the network is satisfactory, sustainable travel should still be promoted in accordance with these policies. Therefore, were the scheme to be recommended for approval a contribution would be required to promote sustainable travel.
- 5.24 A number of representations have been received objecting to on-street car parking in the vicinity. Sanderstead Hill is a classified road B269 and a borough distributor road, with a carriageway which is over 9m wide and existing on-street parking on both sides of the highway and, as demonstrated in the Transport Assessment, there are available areas within the carriageway for on-street parking that are not subject to parking restrictions. Local Plan policies do not restrict over spill parking on unrestricted classified roads. The applicant has also demonstrated that even with the additional over spill vehicle parking there would be low parking stress within the survey area. It is therefore considered that Sanderstead Hill is suitable for overspill parking and that this would not unduly impact the free flow of traffic.
- 5.25 A number of representations have been received regarding highway safety at the site and Sanderstead Hill and the impacts of on-street parking on other road users. A swept path analysis has been provided to demonstrate that vehicles can enter and exit the highway and the site safely. Pedestrian visibility splays are also shown, demonstrating that visibility is in accordance with guidance. If the application were recommended for approval, a condition would be attached requiring submission of the pedestrian and vehicle visibility splays at a larger scale. Objections also refer to the number of accidents, incidents and near misses that occur along Sanderstead Hill. TfL Personal Injury Accident data has been assessed and this shows that for the 3 year period of reporting available 4 x 'slight' injury collisions occurred and that none of the collisions were related to on-street parking.

- 5.26 There is an existing vehicle crossover for the site but a larger 5m crossover is proposed to enable two vehicles to pass each other in the access point, as shown on the plans, and this would be acceptable. 20% active electric vehicle charging points would be provided (1 space) and the remainder of parking spaces would have passive EVCPs as per the Draft London Plan standards. As noted in section 5.10, a demarcated pedestrian access is also provided; it would be unlikely to be practical to provide a fully separated access on this site, so the proposed approach is acceptable.
- 5.27 On balance, it is considered that the provision of 6 on-site car parking spaces is acceptable as there is sufficient capacity on street to accommodate the likely car parking demand generated by this particular development without materially affecting the free flow of the highway or the safety for other road users or pedestrians.

Cycle parking

- 5.28 Policy DM30 and London Plan policy 6.9 and Table 6.3 require provision of 1 cycle parking space per 1-bed unit and 2 cycle parking spaces for all other dwellings, which generates a requirement for 14 cycle parking spaces on this site. A total of 14 spaces are proposed: 12 semi vertical racks (not upright lockers as originally proposed) at the end of the rear garden and 2 x Sheffield stands on the north side of the site. Cycle parking facilities must be secure, integrated, convenient and accessible. The location of the cycle parking store in the rear garden is not the most practical or useable, although it is noted that there is step free access via the path. A revised design should seek to locate the cycle parking within the envelope of the building if feasible.
- 5.29 If the application were recommended for approval, a condition would be attached to provide further details of the cycle store including details of spacing between racks and electric sockets to conform to London Cycle Design Standards. The Sheffield stands are welcomed in line with the requirement to provide 5% Sheffield stands for adapted and wider bikes.

Refuse and recycling

- 5.30 The refuse and recycling enclosure is located at the front of the site, on the north side and is acceptable in terms of distance from the public highway for collection, and is also set away from ground floor windows. The necessary receptacles are provided (recycling 1280ltr, landfill 1100ltr, food 140ltr) in line with the Croydon New Builds and Conversions Waste Management Guidance.

Impact on Trees and landscaping

- 5.31 Local Plan policy 10.8 states that proposals must incorporate hard and soft landscaping and retain existing trees and vegetation and natural habitats. The updated arboricultural report outlines that the development would require the removal of 18 trees plus 3 from the group of Leylandii. All of the trees to be removed are category C or U trees. These include a cluster of predominantly Lawson Cypress, a small Yew Tree, a Holly Tree and a Prunus in the front garden on the northern boundary of the site (adjacent to number 42), as well as some smaller trees along this northern

boundary including a Birch Tree and part of the Leylandii. These removals are necessary to allow for landscaping, including step free access to the rear garden, and provision of car parking at the front. There will be some trees retained on the northern boundary, predominantly Leylandii. There are existing trees in the centre of the rear garden which would also be removed including Lawson Cypress, a Pear tree, a small Judas tree, a Birch tree and a Cedar tree which is necessary to enable the larger building footprint and the provision of rear amenity space. All of these trees have been classified as category C low quality trees.

- 5.32 Representations have raised concern about the potential impact of development on the category B copper beech tree in the neighbouring garden of number 42. The arboricultural report recommends that hard standing is retained in place during building works and then lifted using hand tools and the council's tree officer has advised that this would be satisfactory to safeguard this tree.
- 5.33 A Chestnut tree and a Sorbus tree on the rear boundary have been classified as U and identified for removal due to their poor physiological and structural condition. Representations from adjoining occupiers to the rear have raised concerns about removal of these trees however these would be recommended for removal on purely arboricultural grounds regardless of whether the development is permitted or not. The remainder of the trees on the rear boundary and the southern boundary adjacent to number 46 are to be retained.
- 5.34 It is proposed that two new *Fagus sylvatica* trees are planted in the front garden which would grow up to 6m along with amenity planting along the southern boundary and in various locations around the building. A planting specification for the new trees has been provided. A landscaping masterplan show the trees to be retained on all boundaries along with ornamental planting, amenity grass, play space and permeable paving.
- 5.35 On balance, whilst it is recognised that the quantum of trees to be removed is high, when weighed against other material considerations such as the need to provide on site car parking and step free access to the rear garden, the fact that the trees that are proposed for removal are all category C or U and that replacement landscaping is proposed, it is considered that the removal of the identified trees would be acceptable. If the application were recommended for approval, a condition would be attached to ensure that works are carried out in accordance with the recommendations in the updated arboricultural report and to require that tree protection measures are installed prior to any works on site.

Ecology impacts

- 5.36 A preliminary ecological appraisal and a bat emergence survey has been submitted. The survey identifies that there are designated sites, priority habitats and bats in the vicinity of the site. The existing property has 'low' bat roosting potential and the trees on site all have 'negligible' roosting potential. The bat emergence survey did not reveal any bats emerging or returning to the building but commuting and foraging activity from bats was present in the vicinity. There is an existing pond in the rear garden which has

no evidence of great crested newts. Details have been reviewed by the council's Ecological consultant and deemed to be acceptable. If the application were recommended for approval conditions would be attached requiring works to be carried out in accordance with the recommendations of the ecological appraisal.

- 5.37 Biodiversity enhancements are proposed including the inclusion of native species in the landscaping scheme and inclusion of bat boxes and bird boxes. Conditions would also be attached requiring submission of details of a biodiversity enhancement strategy and a lighting design scheme which is sensitive to wildlife.

Sustainability and flooding

- 5.38 The site is located within an area at low risk of surface water and limited potential for groundwater flooding. A Flood Risk and Surface Water Management Statement has been submitted as part of the application which outlines the risks of flooding at the site. Policy DM25 requires all development to incorporate sustainable drainage measures (SuDS). The proposed increase in the development footprint would increase the impermeable area but the flood risk statement outlines a series of mitigation measures which would reduce on and off-site flood risk overall. These include a low wall at the rear of the property to divert water to the front of the site, soakaways, permeable paving and soft landscaping, all of which have been incorporated. If the application were recommended for approval a condition would be attached requiring details of site specific SuDS measures.
- 5.39 Conditions would also be attached to ensure that a 19% reduction in CO2 emissions over 2013 Building Regulations is achieved to ensure a maximum water use target of 110L per head per day in line with policy SP6.3.

Conclusion

- 5.40 The principle of suburban intensification is supported by policy. However, the proposed design of the scheme is not supported. The character analysis is insufficient and the proposal is considered to be too generic and too vertical in nature which contrasts unsuccessfully with neighbouring properties. As currently proposed the building does not sit well within the street scene and is considered to be harmful to local character and therefore contrary to policy DM10. The absence of a lift is also a concern, contrary to London Plan policy 3.8. Other material planning considerations have been found to be acceptable, although there is scope for improvement of various aspects in a re-designed scheme, particularly the projecting balconies and the cycle parking. On balance, the application is recommended for refusal for the 2 reasons outlined.

6 OTHER MATTERS

- 6.1 The development would be liable for a charge under the Community Infrastructure Levy (CIL).
- 6.2 All other planning considerations including equalities have been taken into account.

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