

1.0 SUMMARY OF APPLICATION DETAILS

Ref: 19/04661/FUL
 Location: 34 Brownlow Road, Croydon, CR0 5JT
 Ward: Park Hill and Whitgift
 Description: Demolition of existing dwelling and the erection of a 4 storey building comprising 7 apartments with a single parking space and other external alterations
 Drawing Nos: 268-D-00-REV-B, 268-D-24, 268-D-23, 268-D-21, 268-D-14-REV-B, 268-D-22, 268-D-01-REV-D, 268-D-08-REV-C, 268-D-05-REV-E, 268-D-16-REV-E, 268-D-09-REV-D, 268-D-10-REV-D, 268-D-07-REV-C, 268-D-17-REVD, 268-D-13-REV-C, 268-D-11-REVE, DN01 Fire Safety Overview, 1950-GUADR-L-20191014 P07, 268-D-06-REV-E, 268-D-03-REV-E, 268-D-04-REV-F.
 Applicant: Mr Justin Owens of SL Dev Ltd
 Case Officer: George Clarke

	1B 1P	1B 2P	2B 3P	3B 4P+	Total
Existing Provision				1	1
Proposed Provision	1	2	3	1	7

- 1.1 A resolution was made to grant this application at the Planning Committee meeting held on the 3rd December 2020. This was following referral by Councillor Vidhi Mohan and in view of objections having been received above the threshold in the Committee Consideration Criteria.
- 1.2 There are two key planning policy matters that have changed since 3rd December 2020 requiring a fresh resolution to be taken:
 1. The Croydon Local Plan (2018) no longer permits larger family homes to be substituted by two bedroom, four person homes; and
 2. The London Plan (2021) has been adopted.
- 1.3 There is also a correction regarding the proposed dwelling mix. The previous report made reference to 2 bedroom, 4 person homes within the development when in fact no dwellings of this type are included; the two bedroom units proposed are for three person occupancy. This report considers the scheme with the mix as identified in the table above.
- 1.4 This report considers the application in greater detail against the relevant London Plan policies that have emerged since the resolution to grant planning permission on the 3rd December 2020.

2.0 RECOMMENDATION

- 2.1 That the Planning Committee resolve to GRANT planning permission subject to a Section 106 Agreement to prevent occupiers from attaining parking permits and a contribution of £10,500 towards sustainable transport initiatives such as a car club and electric vehicle charging provision.
- 2.2 That the Director of Planning and Strategic Transport has delegated authority to issue the planning permission and impose conditions and informatives to secure the following matters:

Conditions

1. Development to be carried out in accordance with the approved drawings and reports except where specified by conditions
2. Time limit of 3 years

Prior to commencement

3. Construction Logistics Plan
4. Details of SUDS to be submitted
5. Land stability investigations
6. Biodiversity enhancement strategy to be submitted

Prior to above ground works

7. Material details to be submitted
8. Details of planter to top floor balcony to be submitted and retained
9. Details of refuse/cycle storage/boundary treatment
10. Details of electric vehicle charging points to be agreed and implemented
11. Hard and soft landscaping to be submitted
12. Visibility Splays to be submitted for front car parking area

Prior to occupation

13. Carbon reduction
14. Details of play space

Compliance

15. Windows serving habitable rooms on southern elevation to be obscure glazed and non-openable
16. No additional windows in the flank elevations
17. Permeable forecourt material
18. Ground floor flats to be M4(2) compliant
19. Car parking provided as specified
20. No obstruction within visibility splays
21. Water usage
22. Tree protection
23. In accordance with the submitted fire statement
24. Any other planning condition(s) considered necessary by the Director of Planning and Strategic Transport

Informatives

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

2.3 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.

2.4 That, if within 3 months of the issue of a draft planning permission decision notice, the legal agreement has not been completed, the Director of Planning and Strategic Transport has delegated authority to refuse planning permission.

3.0 PROPOSAL AND LOCATION DETAILS

3.1 The proposal includes the following:

- Demolition of the existing detached house
- Erection of a four storey building
- Provision of 7 flats with private balconies and communal play space
- Provision of 1 off-street car parking space for disabled users
- Provision of associated bin and cycle stores

3.2 The scheme was amended during the application process and neighbours were re-consulted on amendments. The amendments to the scheme are detailed as follows:

- Increase in the separation distance between the above ground floor levels and the rear boundary
- Changes to the internal layout including a reduction in the total number of flats proposed from 8 to 7
- Introduction of louvre windows and screening on the east facing elevation
- Alterations to the design of the building including changes to the fenestration and the inclusion of a curved recess on the northern elevation
- Changes to the layout of communal areas to improve the quality as well as usability and natural surveillance
- Reduction in the on-site car parking provision

3.3 A set of amended plans were received on 21/12/2021 to pull the landscaping back from the access road. There were no other amendments, so a further round of re-consultation was not necessary.

Site and Surroundings

3.4 The site is on the eastern side of Brownlow Road and contains a four bedroom, two storey detached house with a pitched roof. The application site is on a hill with the land sloping down from north to south.

- 3.5 The surrounding area is mainly residential in character but the surrounding properties are varied in appearance and design. The site has been subdivided in the past and there is now a modern bungalow to the rear of the site (east) with a flat roof. The properties to the north are detached homes with dual pitched roofs similar to the existing house at number 34, whilst homes on Rushmead Close back onto the site from the south. On the opposite side of the road at Langton Way are a number of flat roofed three to four storey terraces.



Fig 1: Aerial street view highlighting the proposed site within the surrounding street-scene. A bungalow has since been constructed to the rear of the site.

Planning History

- 3.6 On 19th February 2020 a lawful development application for the conversion of a house into a 6 bedroom HMO was withdrawn by the applicant (LBC Ref 19/05434/LP).
- 3.7 On 24th November 2016 planning permission was granted for the demolition of the existing garage and erection of a 4 bedroom detached single storey dwelling at rear with associated parking (LBC Ref 16/04872/FUL). This has been constructed.
- 3.8 On 28th July 2016 planning permission was granted for the following extensions to 34 Brownlow Road: removal of existing conservatory; erection of a single storey side extension and new conservatory; enlargement of existing dormer extension in side roof slope (LBC Ref 16/02083/P)

4.0 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The proposed development would create good quality residential accommodation that would make a positive contribution to the borough's housing stock and would make a small contribution to the Council achieving

its housing targets as set out in the London Plan (2021) and Croydon Local Plan (2018).

- The proposed development would be of an appropriate mass, scale, form and design that would be in keeping with its context, thus preserving the appearance of the site and surrounding area.
- The proposed development would not cause unacceptable harm to the amenities of neighbouring residential occupiers.
- The proposed development would not have an adverse impact on the operation of the highway.
- The proposal would not result in the loss of mature trees
- The proposal would not have an adverse impact on flooding.
- Sustainability aspects can be controlled by conditions

5.0 CONSULTATION RESPONSE

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

6.0 LOCAL REPRESENTATION

6.1 The application has been publicised by letters of notification to neighbouring properties in the vicinity of the application site. A re-consultation was also made with amended plans. The number of representations received from neighbours, MPs and local groups in response to notification and publicity of the application are as follows:

No of individual responses: 42 Objecting: 42 Supporting: 0 Comment: 0

6.2 The following issues were raised in representations. Those that are material to the determination of the application, are addressed in substance in the MATERIAL PLANNING CONSIDERATIONS section of this report:

Summary of objections	Response
<i>Principle of development</i>	
Overdevelopment and intensification	Addressed in the report at paragraphs 8.2 – 8.6 and 8.40
Poor quality development	Addressed in the report
Loss of a family home	Addressed in the report at paragraph 8.4
<i>Design</i>	
Out of character	Addressed in the report at paragraphs 8.7 – 8.13
Four stories is too high	Addressed in the report at paragraph 8.8
Materials would not complement existing buildings	Addressed in the report at paragraph 8.9
<i>Amenities</i>	
Loss of light from development	Addressed in the report at paragraphs 8.14 - 8.19

Overlooking and loss of privacy	Addressed in the report at paragraphs 8.14 - 8.19
Disturbance from the level of occupancy	Addressed in the report at paragraph 8.20
Inadequate internal and amenity space for the proposed flats	Addressed in the report at paragraphs 8.23 – 8.24
Bin store inadequate	Addressed in the report at paragraph 8.34
<i>Traffic & Parking</i>	
Not enough car parking	Addressed in the report at paragraphs 8.28 – 8.29
Traffic will increase and add danger	Addressed in the report at paragraphs 8.31 – 8.32
<i>Other matters</i>	
Harm to trees and ecology	Addressed in the report at paragraph 8.35 – 8.37
No lift provision	Addressed in the report at paragraph 8.26
Fire risk	Addressed in the report at paragraph 8.27
Developer has not been considerate to neighbours and inconstancy with previous planning permissions at site	The current Local Plan was adopted in 2018 and consent for 34A Brownlow Road was granted under a previous policy framework
Land ownership dispute/notice from developer not served on time	This is a civil matter
Land stability concerns	Addressed in the report at paragraph 8.21

6.3 Councillor Vidhi Mohan referred the application to planning committee and objected on the following grounds:

- Overlooking at close range
- Loss of sunlight and daylight for adjoining occupiers in conflict with Local Plan policy DM10.6
- Scale, height massing and density is out of character with the area in conflict with Local Plan policy DM10.1
- Design and materials are not high quality and would not complement existing buildings in conflict with Local Plan policy DM10.4

7.0 RELEVANT PLANNING POLICIES AND GUIDANCE

7.1 In determining any planning application, the Council is required to have regard to the provisions of its Development Plan so far as is material to the application and to any other material considerations. Such determination shall be made in accordance with the Plan unless material considerations indicate otherwise. The Council's adopted Development Plan consists of the Consolidated London Plan (March 2021), the Croydon Local Plan (February 2018), and the South London Waste Plan 2012.

- 7.2 Government Guidance is contained in the National Planning Policy Framework (NPPF) (2021). 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 latest version of the NPPF has an increased focus on good design.
- 7.3 The main policy considerations raised by the application that the Committee are required to consider are:

Croydon Local Plan (adopted February 2018)

- SP2 – Homes
- DM1 – Housing choice for sustainable communities
- SP4 – Urban Design and Local Character
- DM10 – Design and character
- DM13 – Refuse and recycling
- SP6 – Environment and Climate Change
- DM23 – Development and construction
- DM24 – Land contamination
- DM25 – Sustainable drainage systems and reducing flood risk
- SP7 – Green Grid
- DM27 – Biodiversity
- DM28 – Trees
- SP8 – Transport and Communications
- DM29 – Promoting sustainable travel and reducing congestion
- DM30 – Car and cycle parking in new development

London Plan (adopted March 2021)

- 7.4 The London Plan sets a new housing target of 20,790 homes over the period of 2019-2029 for the borough, with “small sites” required to provide a minimum of 6,470 of these homes. The minimum small site housing target for Croydon of 641 homes a year is not dissimilar to but slightly larger than the adopted 2018 Croydon Local Plan target of 592 each year.
- 7.5 The overall housing target in the London Plan is 2,079 new homes per annum (2019 – 2029) compared with 1,645 in the Croydon Local Plan 2018. Therefore Croydon is required to deliver more new homes than our current Croydon Local Plan 2018 and previous London Plan (incorporating alterations 2016) targets.
- 7.6 The policies of most relevance to this application are as follows:
- GG2 Making the best use of land
 - GG4 Delivering the homes Londoners need
 - D1 London’s form, character and capacity for growth
 - D2 Infrastructure requirements for sustainable densities
 - D3 Optimising site capacity through the design-led approach
 - D4 Delivering good design
 - D5 Inclusive design

- D6 Housing quality and standards
- D7 Accessible housing
- D11 Safety, security and resistance to emergency
- D12 Fire safety
- D14 Noise
- H1 Increasing housing supply
- H2 Small sites
- H10 Housing size mix
- S1 Developing London's social infrastructure
- S4 Play and informal recreation
- HC1 Heritage conservation and growth
- G1 Green infrastructure
- G4 Open space
- G5 Urban greening
- G6 Biodiversity and access to nature
- G7 Trees and woodlands
- SI1 Improving air quality
- SI2 Minimising greenhouse gas emissions
- SI3 Energy infrastructure
- SI4 Managing heat risk
- SI5 Water infrastructure
- SI7 Reducing waste and supporting the circular economy
- SI12 Flood risk management
- SI13 Sustainable drainage
- T1 Strategic approach to transport
- T2 Healthy streets
- T3 Transport capacity, connectivity and safeguarding
- T4 Assessing and mitigating transport impacts
- T5 Cycling
- T6 Car parking
- T6.1 Residential parking
- T7 Deliveries, servicing and construction
- T9 Funding transport infrastructure through planning
- DF1 Delivery of the plan and planning obligations

7.7 There is relevant Supplementary Planning Guidance as follows:

- Croydon Suburban Design Guide Supplementary Planning Document (2019)
- Croydon SPG 12: Landscape Design
- GLA Housing SPG (2015)

8.0 MATERIAL PLANNING CONSIDERATIONS

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

1. Principle of development

2. Townscape and visual impact
3. Residential amenity for neighbours
4. Housing quality for future occupiers
5. Traffic, highway and servicing implications
6. Trees, landscaping and biodiversity
7. Sustainability and environment
8. Other matters

The principle of the development

- 8.2 This proposed development needs to be assessed against a backdrop of significant housing need, not only across Croydon but across London and the south-east. All London Boroughs are required by the London Plan to deliver a number of residential units within a specified plan period. In the case of the LB Croydon, there is a requirement to deliver a minimum of 20,790 new homes over the period of 2019-2029.
- 8.3 Policy SP2.1 of the Croydon Local Plan (2018) applies a presumption in favour of development of new homes and Policy SP2.2 states that the Council will seek to deliver 32,890 homes between 2016 and 2036, with 10,060 of said homes being delivered across the borough on windfall sites. Policies H1 and H2 of the London Plan seek to increase housing supply and utilise small sites. London Plan policy D3 encourages incremental densification to achieve a change in densities in the most appropriate way and policy H3 seeks to significantly increase the contribution of small sites to meeting London's housing needs. The London Plan (2021) also states that London Boroughs should proactively support well-designed new homes on small sites (below 0.25 hectares in size) through planning decisions in order to significantly increase the contribution of small sites to both meeting London's housing needs and diversify the sources, locations, type and mix of housing supply (Policy H2). Given the above, the principle of intensifying the residential use of the existing site to provide a greater quantum of homes than existing is acceptable.
- 8.4 Croydon Local Plan Policy DM1.2 seeks to prevent the loss of small family homes by restricting the net loss of three bed units and the loss of units that have a floor area less than 130m². The existing building is a 4 bed house and is has an internal floor area of 145m². A 3 bedroom flat would be provided in the development and as such there would be no loss of family sized dwellings.
- 8.5 CLP Policy SP2.7 seeks to ensure that a choice of homes is available to address the borough's need for homes of different sizes and that this will be achieved by setting a strategic target for 30% of all new homes up to 2036 to have three or more bedrooms. Policy DM1.1 requires a minimum provision of homes designed with 3 or more bedrooms on sites of 10 or more dwellings. In order to meet this strategic target, requirements for proportions of family sized accommodation based on PTAL are applied to major applications, and the general 30% target for 3 bedroom homes is normally applied on smaller scale suburban intensification schemes. It is acknowledged that only one of the flats would have three bedrooms, which is just over 14% of the total. However, a reasonable mix of different sized homes are provided and given that this is not a major application,

it is accepted that it is not always possible to meet the 30% requirement. On balance, this is considered acceptable.

- 8.6 The site is located within an existing residential area and for the reasons outlined above, providing that the proposal accords with all other relevant material planning considerations, the principle of development can be supported.

Townscape and visual impact

- 8.7 The existing dwelling is not statutorily or locally listed and therefore there is no objection to its demolition.
- 8.8 London Plan (2021) policy D3 requires development to follow a design-led approach that optimises the capacity of sites to ensure that development is of the most appropriate form and land use for the development site, as well as responds to development sites' context and capacity for growth. The proposed replacement with a four storey building to contain seven flats is considered to optimise the capacity of the site to provide new dwellings in a residential area which has a mixed typology of buildings.
- 8.9 The Croydon Local Plan seeks new development to achieve a minimum height of three storeys. The Suburban Design Guide states that where surrounding buildings are predominantly detached homes of two or more storeys, new development may be three storeys with an additional floor contained within the roofspace. The proposal is four storey with the top floor set back from the edges of the building. The immediate area has a varied residential character consisting of detached two storey dwellings with chalet style pitched roofs and three storey terraces in a block form opposite the site on Langton Way. The proposal has been designed to appear in keeping with the existing typology across the road with a recessed fourth storey, which is considered appropriate for the setting.



Fig 2: Photograph of 1-5 Langton Way which is opposite the site

8.10 The design of the building would incorporate large areas of glazing and projecting balconies to the frontage with a darker brick at ground floor, white brick at first and second floors and white timber cladding for the recessed third floor level. These features and the variance in materials would provide a visual interest and it is considered that the light palette would minimise the apparent bulk of the building. The materials are also reflective of those used in the nearby area. It is recommended that these details are secured by condition so to ensure they are of a suitable quality.



Fig 3: CGI showing the front of the proposed development

8.11 The entrance to the flats would be positioned on the southern elevation and identified with two curved walls which run up to third floor level. This would give legibility to the building and break up the façade. Bin storage would be to the front of the site near the collection point and surrounded by natural screening.

8.12 Policy DM10.2 seeks to create well defined and designed public and private spaces and advises that forecourt parking should only be allowed where it does not cause undue harm to the character or setting of the building and is large enough to accommodate parking with sufficient screening. Given the overall scale of the development it is considered that the proposed extent of hardstanding would not be excessive. A single immature tree toward the front of the site would be felled to make way for the new parking area and although any loss of trees is regrettable this specimen is of little merit or significance within the street scene. A dwarf front boundary wall is shown on the plans with hedging behind and this would provide appropriate new planting and screening for the bin and parking area which would maintain the appearance of the street scene.

8.13 The layout of the development would respect the pattern and rhythm of neighbouring area, taking design cues from the blocks directly opposite. It responds to the local setting and the siting of adjoining buildings and is a sensitive intensification of the area. Having considered all of the above, against

the backdrop of housing need, officers are of the opinion that the proposed development would comply with the objectives of the above policies and the Suburban Design Guide SPD (2019) in terms of respecting local character.

Residential amenity for neighbours

- 8.14 London Plan Policy D6 requires the design of development to provide sufficient daylight and sunlight to surrounding housing that is appropriate for its context. Local Plan Policy DM10.6 states that the Council will not support development proposals which would have adverse effects on the amenities of adjoining or nearby properties, or have an unacceptable impact on the surrounding area. This can include a loss of privacy, a loss of natural light, a loss of outlook or the creation of a sense of enclosure.
- 8.15 The nearest neighbours are the bungalow at 34A Brownlow Road to the east, 36 Brownlow Road to the north and numbers 5-7 Rushmead Close which are to the south of the site.
- 8.16 The scheme was amended to increase the separation distance to 34A Brownlow Road. Whilst it would not meet the recommended 18m separation distance as contained within the Suburban Design Guide, windows facing toward this neighbour on the first and second floors would serve bedrooms rather than living room areas and would be louvered so to minimise overlooking. The rear facing flat on the top floor would feature a permanent planter to the rear balcony which would suitably limit views down toward 34A for residents when they are inside the flat. Exact details of the planter can be required by condition.
- 8.17 The development would be 5m taller than the existing house to be demolished. The upper floors would be staggered to have a greater level of separation per level, with the closest proximity at ground floor of 10m increasing to a maximum of 15.74m at fourth storey from the west facing windows of 34A Brownlow Road. It is considered that this neighbour would not be unduly enclosed or experience harmful loss of light to rooms or the garden area. This is supported by a Daylight and Sunlight Study which demonstrates that BRE standards would be met and the development would not harm living conditions at 34A. Hedge planting would provide low level screening and a natural buffer from the communal space for the flats and this neighbour.

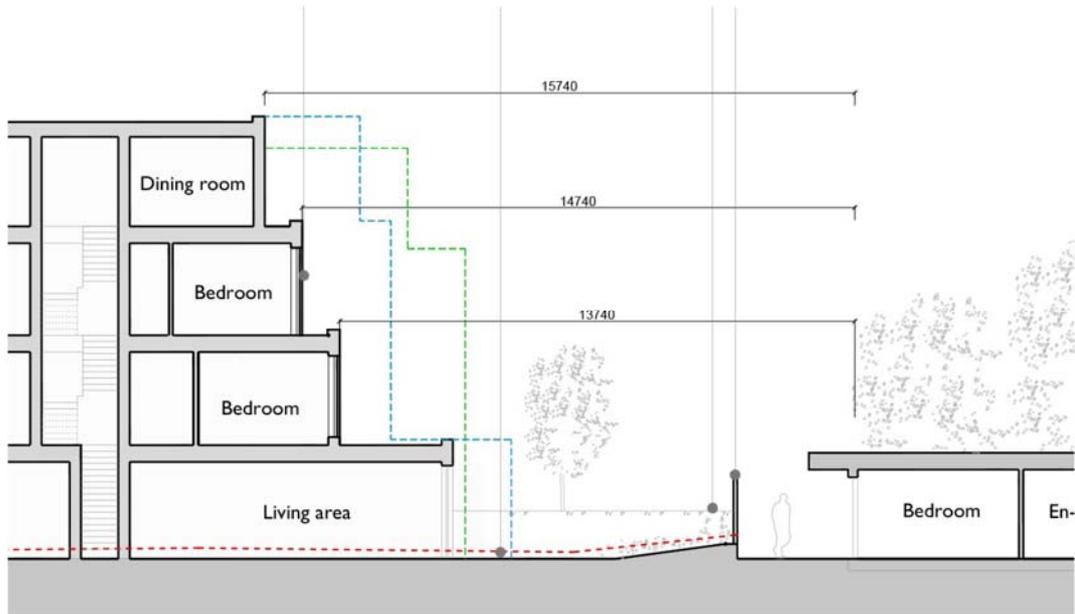


Fig 4: Section showing the massing and separation with the rear bungalow (34A). The green line shows the position of the building as presented at pre application stage whilst the blue line shows the outline of the proposed building as originally as submitted in this application

- 8.18 36 Brownlow Road is the neighbour adjacent to the north of the site and has a higher ground level. The applicant has provided horizontal 45 degree lines from the centre of the nearest habitable room windows for both the front and rear building lines which demonstrates that there would be no harmful enclosure or unacceptable loss of light. The Daylight and Sunlight study supports this and that the position of the building would also not result in harmful overshadowing to the garden. Windows on the north elevation of the block would be obscure glazed and so the privacy of occupiers at 36 Brownlow Road would be protected. It is therefore considered that the development would cause no significant harm to living conditions at 36 Brownlow Road.
- 8.19 Numbers 5 and 7 Rushmead Close are part of a terrace to the south of the site and have a lower ground level. These neighbours are orientated at an angle toward the east so that they would not directly face the side wall of the development. The rear wall of 5 Rushmead Close would be 13m from the proposed building at the closet point (14m to Number 7) and the fourth storey would have a set back so to provide greater separation at the higher level. Given the position of these neighbours directly to the south, they would continue to receive good levels of sunlight. There are existing trees in the gardens which would provide some natural screening and the 4m gap from the development to the shared boundary would mitigate any overbearing effect or loss of daylight. Windows at first floor and above serving habitable rooms on the southern elevation would be obscure glazed and unopenable so to prevent loss of privacy. This is acceptable.
- 8.20 As regards noise and disturbance, the proposed development would not result in undue noise, light or air pollution as a result of an increased number of occupants on the site. The increased number of units would increase the number of vehicle movements to and from the site, but this would not be significant and is not considered harmful.

8.21 Objections have been received which refer to land stability and in particular the potential effect of the development on a retaining wall to Rushmead Close. A condition is recommended (proposed condition 5) for pre-commencement site investigations to ascertain the capability of the boundary retaining structures and for the developer to undertake any remedial works as required.

Housing quality for future occupiers

8.22 London Plan Policy D6 requires housing developments to be of a high quality design and contains space standards for new dwellings. The provision of dual aspect dwellings should be maximised and a single aspect dwelling should only be provided where a more appropriate design solution to meet the requirements of Part B in Policy D3 (optimising site capacity through the design led approach). The design should provide sufficient daylight and sunlight and ensure the usability of outdoor space is maximised.

8.23 All of the proposed dwellings would meet the minimum required internal space standards as specified in Table 3.1, London Plan Policy D6. Each of the flats would have windows on three sides. Whilst the windows on the side elevations would be obscure glazed, in the interest of protecting neighbour privacy, these windows provide good levels of light to the homes. Whilst the east facing windows to three of the flats would have louvres to protect neighbour privacy, these are each duplex dwellings with Units 2 and 3 having good outlook from the ground floor level and Unit 6 having outlook from windows looking out over the balcony.

8.24 Each of the seven flats would have access to private courtyard or balcony areas offering useable outdoor amenity space. Each of these areas would meet the minimum space requirements of Local Plan Policy DM10.4 and London Plan Policy D6. The local plan requires all flatted development to provide new child play space on top of the amenity space to be provided for the scheme itself. A communal area is proposed to the rear of the site with 9.1m² of play space, which accords with the requirements of Table 6.2 from the Local Plan.

8.25 Table 3.2 of London Plan Policy D6 details qualitative design aspects to be addressed in housing developments. This table states that communal outdoor amenity spaces should amongst other things, be located to be appreciated from the inside and to be positioned to allow overlooking. The communal amenity space for the development would be positioned behind the building toward the eastern end of the site. It must be acknowledged that the design incorporates screening methods from the east facing windows and balcony at the upper levels in the interest of protecting neighbouring living conditions and that this would restrict overlooking of the communal space. It is considered however that the proposed location of the communal garden would be appropriate for residents and a degree of overlooking and surveillance would be achieved from the ground floor of Units 2 and 3, which would have their main entrances to the rear, as well as patio doors opening towards this area and private garden areas bordering the communal space.

- 8.26 London Plan Policy D7 requires new dwellings to be building regulation M4(2) compliant for use by persons with disabilities, with 10% meeting M4(3). The three flats accessed on the ground floor would be M4(2) accessible and this would be secured by condition. No lift would be provided and as such the four flats above would not meet the M4(2) standard. Policy D7 does allow flexibility in exceptional circumstances in blocks of four storeys or less, as is the case here. Policy H2 states in the reasoned justification that *'homes located on the ground floor on minor developments should meet the requirements of Policy D7 Accessible housing. Homes that are not on the ground floor on minor developments can comply with the M4(1) standard, which does not require step-free access, where provision of step-free access would be unfeasible'*. Officers consider that given that this is a relatively small scale development, with only four flats above ground floor, the provision of a lift would be unfeasible to serve such a limited number of flats. Therefore exceptional circumstances exist.
- 8.27 A Fire Safety Strategy has been submitted which sets out how the proposal can meet the requirements of policy D12 (A) in the London Plan. Sprinkler protection is proposed throughout each apartment in order to negate the need for the fire service vehicle to enter the site and prevent a blockage of the access road which also serves 34A Brownlow Road. The details are considered acceptable and will be secured by condition.

Traffic, highway and servicing implications

- 8.28 The Public Transport Accessibility Level (PTAL) rating is 1b which indicates poor accessibility to public transport. The site is however approximately one mile from Croydon District Centre and less than a ten minute walk from Lloyd Park tram stop. The street is within a Controlled Parking Zone (CPZ). The London Plan and Policy DM30 of the Croydon Local Plan 2018 sets out that maximum car parking standards for residential developments based on public transport accessibility levels. Table 10.3 of the London Plan gives a maximum of 1.5 car parking spaces to be provided per dwelling in outer London areas with a PTAL of 0-1. It is important to note however that it is not necessarily desirable to provide car parking up to the maximum standards given the requirements of both the London Plan and Croydon Local Plan which seek to reduce reliance on car usage and promote/prioritise sustainable modes of transport. As such a lower level of car parking can be supported and is encouraged in line with the ambitions of the Development Plan.
- 8.29 This scheme proposes a single on-site parking bay. Given this level of provision it would be required that a Section 106 Agreement is secured which prevents occupiers from attaining parking permits. A contribution of £1,500 per dwelling from the developer to go toward sustainable transport initiatives such as car clubs and cycle lanes would also be secured. In consideration of the above and the close proximity of the site to Croydon District Centre and a tram stop, the proposed car parking is acceptable.
- 8.30 There are a number of representations that refer to the parking provision, on-street parking and highway safety at the site. In respect to highways safety, the scheme provides one off-street parking space and this will need to adhere to the

parking visibility splays and parking standards to ensure that safety requirements are adhered to. In compliance with the London Plan an electric vehicle charging point should be installed in the parking area and this can be secured by way of a condition.

- 8.31 There is space available on site to allow vehicles to turn and exit in forward gear and this has been demonstrated through tracking drawings provided by the applicant. A condition is recommended to require the proposed visibility splays to be implemented and officers are satisfied that the scheme would not harm the safety and efficiency of the highway network. It is considered the network and transport impacts associated with the developments on traffic and transport would be negligible and it is unlikely to have a significant impact on highway safety.
- 8.32 The access to the side of the property would be of sufficient width to allow a fire vehicle to access and fire safety to 34A Brownlow Road would not be compromised.
- 8.33 Cycle storage facilities would comply with the London Plan (which would require 12 spaces) and would be secure and undercover. Full details of the cycle store can be required by condition.
- 8.34 The refuse arrangements would be contained within a brick enclosure toward the front of the site and contain 1 x 1100ltr landfill receptacle; 1 x 1100ltr for dry recycling and 1 x 140ltr food recycling. This store is in an accessible location and is of a sufficient size.

Trees, landscaping and biodiversity

- 8.35 Local Plan Policy DM28 states that the Council will protect and enhance the borough's trees and hedgerows by not permitting development that would result in the avoidable loss or excessive pruning of preserved trees or hedgerows or those that make a positive contribution to the character of an area. London Plan Policy G6 seeks development to provide a biodiversity net gain and G7 seeks to ensure trees of value are retained.
- 8.36 There are no large mature trees or specimens of quality within the site with much of the area is already hard landscaped. The proposal would involve the installation of hedges and planting beds primarily around the borders and it is considered that this could provide a suitable environment for wildlife. A condition can be applied to ensure that enhancement measures for wildlife such as bat bricks, hedgehog domes, bee bricks and bird boxes are incorporated within the site, so as to seek to achieve a biodiversity net gain.
- 8.37 There are several large trees outside the site including two within the site boundary of 36 Brownlow Road which are covered by a Tree Preservation Order. A Tree Protection Plan has been provided for the TPO Pine within the front garden area of 36 Brownlow Road which is considered acceptable to protect it during construction. This can be secured by condition.

Sustainability and environment

8.38 Croydon Local Plan Policy SP6.3 requires all new build residential development of fewer than 10 units to achieve the national technical standard for energy efficiency in new homes set at a minimum of 19% CO2 reduction beyond Part L of the Building Regulations and requiring new build development to meet a minimum water efficiency standard of 110 litres/person/day. Consequently, it is recommended that planning conditions be imposed to ensure that the development achieves both requirements

Other matters

8.39 The site is located in an area with an identified low risk of surface water flooding. It is likely that infiltration of surface water runoff following redevelopment may be feasible. The hardstanding areas have been reduced from as originally submitted and would incorporate permeable paving with soft planting to the edges which will provide capacity for surface water runoff from hardstanding areas in up to the 1 in 100 years plus 40% climate change event. This can be secured through a condition.

8.40 Representations have raised concerns that local services will be unable to cope with additional families moving into the area. The development will be liable for a charge under the Community Infrastructure Levy (CIL). This payment will contribute to delivering infrastructure to support the development of the area, such as local schools.

Conclusions

8.41 The principle of development is considered acceptable within this area. The design of the scheme is of an acceptable standard and appropriate in relation to residential amenity, transport, sustainability and ecological matters. Whilst the mix of the scheme does not meet the strategic policy, given the other benefits of the scheme, in main the delivery of homes, this is suitably outweighed in the planning balance.

8.42 All other relevant policies and considerations, including equalities, have been taken into account.