

Application No. 20/06469/FUL - 51 The Ridge Way, South Croydon, CR2 0LJ, ,

1. SUMMARY

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

Demolition of existing two storey detached dwelling and construction of a two/three storey building to the front comprising 6 self-contained flats and part single; part two storey building to the rear (3 terraced dwellings); proposed access drive leading to the rear of the site; vehicular parking and new crossovers; hard and soft landscaping; boundary treatment; communal/play and private amenity space and cycle and refuse storage.

2. DECISION

Permission Refused Reason(s) for refusal :-

1 The proposed development, by reason of the site layout/approach and overall design/architectural expression of the rear building including lack of character analysis would result in a cramped form of overdevelopment that would appear dominant, incongruous and visually intrusive to the form, proportion and appearance of the site, visual amenities of the streetscene and general character and appearance of the area. As such, the proposal would be contrary to Policies D1, D3, D4 of the London Plan (2021), Policies SP4, DM10, DM18 of the Croydon Local Plan (2018) and the Croydon Suburban Design Guide (2019).

2 The proposed development, by reason of the poor and convoluted/cramped site layout including siting of refuse/cycle storage, poor visibility/sightlines throughout the site, narrow and dangerous access drive which also lacks any passing area to the front would result in a detrimental impact to the highway safety and pedestrian/occupier environment of the area. As such, the proposal would be contrary to Policies T1, T4, T5, T6, T7 of the London Plan (2021), Policies SP8, DM29, DM30 of the Croydon Local Plan (2018) and the Croydon Suburban Design Guide (2019).

3 The proposed development, by reason of the combined height, width and depth of the rear building would result in loss of daylight/sunlight and some sense of enclosure, outlook, overbearing impact and visual intrusion to the amenities of the occupiers of the adjacent extant permission to the rear of no.7-9 Arkwright Road. As such, the proposal would be contrary to Policies D1, D2 of the London Plan (2021), Policies SP4, DM10 of the Croydon Local Plan (2018) as well as the Croydon Suburban Design Guide (2019).

4 The proposed development would result in sub-standard and poor quality accommodation, convoluted and dangerous environment as well as a cramped and isolated communal/play area. As such, the proposal would be contrary to Policies D4, D5, D6, D7 of the London Plan (2021), Policies SP4 and DM10 of the Croydon Local Plan (2018) and the Croydon Suburban Design Guide (2019).

5 The development would fail to provide a sufficient amount of family accommodation and would thereby conflict with Policies H1, H2 of the London Plan (2021), Policies SP2.7,

DM1.1 of the Croydon Local Plan (2018) and the Housing Supplementary Planning Guidance to the London Plan (March 2021).

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 via the Council's Pre Application process. The Local Planning Authority delivered the decision in a timely manner.

Informative(s):

1 Any policies referred to on this decision notice are the policies of The Croydon Local Plan (2018) and the London Plan (2021) unless otherwise stated. The CLP can be viewed on the Council's Website at www.Croydon.gov.uk and the London Plan can be viewed at www.London.gov.uk

2 **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 application seeks planning permission for:

- Demolition of existing two storey detached dwelling (4 bedrooms and 217sqm);
- Construction of a two/three storey building to the front comprising 6 self-contained flats (2x3 bed, 2x2 bed, 2x1 bed) and part single; part two storey dwellings to the rear (3x2 bed);
- Reinstatement of crossovers and creation of two new crossovers;
- Proposed access drive leading to the rear of the site along no.49 The Ridge Way;
- Vehicular parking to the front and centre of the site;
- Hard and soft landscaping;
- Boundary treatment;
- Communal/play and private amenity space;
- Cycle and refuse storage.

(b) Site Description

3.1 The application site comprises a relatively large two storey detached dwelling along The Ridge Way within a predominantly residential character. The plot is much deeper than the adjacent properties with the garden encroaching further into the properties along Morley and Arkwright Road.

3.2 The properties tend to be similar in their form and proportion although the architectural detailing of the immediate properties does vary. The immediate properties along this side of the road tend to have hipped roof formations whilst the properties opposite have a gabled roofslope. The forecourts of these properties are predominantly hardsurfaced (vehicular parking) with dense tree cover towards the rear. The host site has two existing vehicular crossovers.

3.3

(covered by TPO 52 of 2007) which also protects other trees within the site of

no.7

3.4 The land levels appear flat according to the submitted Topographical Survey

3.5

(c) Relevant Planning History

3.5 20/02165/PRE - Demolition of existing two storey detached dwelling and construction of a two/three storey building to the front (3x3 bed, 2x2 bed, 1x1 bed) and two/three storey building to the rear (3x3 bed); proposed access drive leading to the rear of the site; vehicular parking; hard and soft landscaping; boundary treatment; land level alterations; communal/play and private amenity space (including sub-division) and cycle and refuse storage – Closed 08/10/2020

4. CONSULTATIONS

4.1 The application was publicised online as well as through letters sent to neighbouring occupiers of the application site.

No of individual responses: 154 Objecting: 154 Supporting: 0

4.2 A summary of the comments related to planning considerations are detailed below and discussed within the report:

Objection	Officer Comment
Principle	
Loss of Family Home	See paragraphs 5.1 – 5.6
No affordable or social housing	
Design and Character	
Not in keeping and poor design	See Paragraphs 5.7 – 5.16
Too much density	
Out of character	
Area is already overdeveloped	
Overdevelopment	
Concreting the site and loss of green space	
Neighbouring Amenity Impact	
Overlooking and privacy	See Paragraphs 5.17 – 5.29
Increase of noise	
Loss of light	
Visual intrusion	
Overbearing and out of scale	
Prejudice future development to the rear of no.7-9 Arkwright Road which has commenced	In relation to a material start, officers have visited the site and surrounds and note the adjacent permission has not materially started. The applicant also recently confirmed this. Please

	see neighbouring amenity section.
Highways and Parking	
Not enough parking	See Paragraphs 5.41 – 5.53 A pre-commencement condition requesting a detailed strategy to manage construction would have been attached.
Noise and disturbance from construction	
Increase in traffic	
Too dangerous to pedestrians	
Landscaping	
Too many trees being lost	See Paragraphs 5.54 – 5.58
Badgers in site and general biodiversity concerns	
Flooding and Sustainability	
Must be close to zero carbon emissions	See paragraphs 5.59 – 5.63
Pollution	
No information on lighting	
Standards of Accommodation	
Poor quality units and small communal/play area – too cramped	See Paragraphs 5.30 – 5.40
Sub-standard	
Other Matters	
Additional rubbish	Not Material Planning Considerations
More flats not needed	
Impact to local services which will not be able to support this development	
Greed	
Increase risk of fire	
Loss of house value	
Will impact people's health	
Red line incorrect	Officers consider the site boundary to be correct
Unsold flats in area	

4.3 Cllr Yvette Hopley

- Overdevelopment/Out of character
- Loss of trees
- Height of front building
- One flat has only rooflights for occupants
- A lift is needed for flatted block

4.4 The Sanderstead Residents Association (SRA) objected on the following grounds:

- Refuse store not accessible – too long of a route and dangerous siting
- Parking is 1 space below 1:1 requirement

- No lift for flatted block
- Bedroom 2 in flat 6 has only rooflights so poor outlook
- Too much development
- Rear houses are 2b 4p and not 2b 3p – substandard units
- This sit would be better with dwellings

Ecology Consultant

4.5

insufficient ecological information on European Protected Species (bats) and Priority species and habitats.

5. MATERIAL CONSIDERATIONS

Principle of Development

- 5.1 The London Plan (LP) and Croydon Local Plan (CLP) support the delivery of new housing in sustainable locations, to address the need for new housing to suit local communities. The CLP Policies states that approximately 30% of future housing supply may be delivered by windfall sites which provide sensitive renewal and intensification of existing residential areas and play an important role in meeting demand in the capital, helping to address overcrowding and affordability issues.
- 5.2 The proposal would demolish the existing two storey (4 bedroom) dwelling and replace it with a two/three storey front flatted block and a rear building comprising 3 terraced dwellings – part single; part two storey. This would be acceptable, from a land use perspective, in principle and in accordance with the CLP Policies (2018) and SPGs – in particular, SPD2 Suburban Residential Development (2019).

Affordable Housing

- 5.3 The proposed scheme falls below the threshold of ‘10 units’ and therefore the need to provide affordable housing is not a requirement for this type of proposal.

Housing Mix

- 5.4 Policy SP2.7 of the CLP 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 DM1.2 of the CLP seeks to prevent the net loss of 3-bedroom homes (as originally built) and homes less than 130sqm.
- 5.5 Existing floor plans demonstrate the property is more than 130sqm and contains 4 bedrooms and therefore protected under Policies SP2.7 and DM1.2 of the CLP. The proposal, as a whole, would only provide 2x3b5p (22%). Whilst it is appreciated that a large 1x2b 4p unit is proposed within the front flatted block alongside rear houses, the proposal would fail to meet the strategic target of ensuring 30% of units are family sized 3 bedroom units.

- 5.6 Overall, taking into account the backdrop need for housing, the proposal would fail to meet the strategic target in delivering 30% family sized (3 bedroom +) units.

Design and Character

- 5.7 The application site comprises a large two storey detached dwelling (4 bedrooms) along The Ridge Way within a predominantly residential character. The host site has two crossovers with a central bank of soft landscaping separating the two access points. The frontage is relatively soft landscaped and so is the rear of the site. The dwelling is a traditional hipped roof property with single storey side extensions running along the side of the property.
- 5.8 The immediate four properties of no.47, 49, 51, 53 are more unique as they sit on much smaller plots apart from the host site which has a deep garden which intersects within the plots of Morley Road and Arkwright Road. Whilst some of the properties display uniformity, the overall context does vary in form, proportion and appearance. The opposite properties tend to be more uniform. There is an arts and craft style of the area.
- 5.9 The proposal would demolish the existing dwelling and erect a two/three storey flatted front block and a rear block comprising 3 (part single; part two storey) dwellings with associated landscaping and parking including access drive.
- 5.10 As a starting point, it is important that any scheme defines the character of the area so an understanding can be made with regards to the design approach as per section 2.8 of the SPG - Suburban Residential Development (2019). A 'character appraisal' by Jameson has been submitted. However, this is more of a photo study of the surrounding context and whilst useful to know, this lacks critical and contextual analysis of how the proposed design has been inspired from the context. This is needed to justify the design rationale of the proposal and how the massing, layout, appearance, access and scale relates to the surrounding character of the area or the immediate neighbouring properties, and most importantly within the site itself is fundamental. The Councils SPD is very useful in guiding how developments should be tackled. With that being said, it would appear a 'Contemporary Reinterpretation' approach to character has been adopted with very small elements of 'Sympathetic and Faithful.' The pitched roofs and materials suggest that a nearby Arts & Crafts building has been a source of inspiration.
- 5.11 Section 2.10 of the SPD (Heights of Development) states in a context of this type, a three storey building with the top floor successfully consolidated within the roof could be acceptable (purely in terms of scale) – front flatted block. Section 2.12 (Form of Developments in Rear Gardens) requires rear developments to be subservient to any frontage developments. This normally means lower in height than the front building. If any part of the proposed development would be within 18m of the rear wall of any neighbouring dwelling, the proposal should be of a lower height. This may be best achieved by being 1 storey lower than any neighbouring dwellings, however accommodation may be provided within roofspace. In this instance, the front block would be two/three storeys with the rear part single; part two storeys which would be subservient within the site. The submitted streetscene and section drawing further demonstrates that the relationship in the context, purely in terms of scale would be appropriate.
- 5.12 To an extent, the host plot has an 'L-shape' layout and as mentioned before is unique in this merit in comparison to the immediate adjacent plots, which are much

smaller. It is understood why the applicants have decided to go for a front and rear development. Purely from a site layout perspective, it is considered the siting of the buildings and access drive running along the side of no.49 with front and rear parking is in line with the SPD. The host plot is approx. 60m deep and 23m wide. The rear of the front flatted block to the front of the rear houses would have an approx. 19m separation distance which would comply with Section 2.9 of the SPD, purely in terms of relationship. The four immediate properties tend to be well separated from the common boundaries. Whilst these dwellings have side extensions, these are single storey and therefore afford a break between the buildings. The proposed flatted block would sit approx. 1.5m to no.53 and 6.2m to no.49 which is considered a sufficient and large gap – due to the access drive. Noting the characteristic context, the separation between the boundaries would be acceptable and compliant with Section 2.16 of the SPD. There would also be a 1.5m separation distance from the rear dwellings to the side boundaries.

- 5.13 Whilst the site layout would in parts comply with the SPD, this is purely on a site circumstance basis. In this case, the two proposed buildings alongside the quantum of hard standing would completely overpower and dominate the host site which is predominantly of soft landscaping. It is crucial for developments of this type to be softened by soft landscaping and ensuring the verdant settings are respected. The site frontage would have very little soft landscaping with the proposed access drive/parking courts covering a sheer amount of the site. Furthermore, given the size of the front flatted block, this leaves no choice for the required communal/play amenity areas to be forced within a cramped section. The main bulk of this area would sit right behind flat 1 in a small and isolated location which would be the principle area for communal space. It is fair to say there would be a gap from this area running along the rear boundary of no.7-9 Arkwright Road although this would be 0.7m in width and as such not considered to be sufficient for manoeuvring or accessibility. The area behind the side/rear of the central parking bays is not considered to be classed as communal/play space and more as soft landscaping. The rear houses would cover a significant portion of the rear garden and would result in small and cramped rear gardens for the proposed dwellings, especially house 7. The private to communal amenity areas would be far too close with the general quantum of hard standing to accommodate the proposal for 9 units in this layout would be too much for the site. The general form and layout would constitute a cramped form of overdevelopment.
- 5.14 In terms of the architectural expression, character and critical analysis is the sole starting point of where the design needs to be considered to which the proposal has failed to do so. Despite this, the submitted drawings, including the streetscene, does demonstrate the front flatted block has taken some cues from the area and its form, proportion and appearance, would respect the context of the site and area. The fenestration placement and formation of the roof form would be acceptable. However, as mentioned in the principle section, there is an extant permission for 3 bungalows to the rear of no.7-9 Arkwright Road. Whilst not implemented, this is a material consideration and noting that Section 2.4.4 of the SPD requires developments to not prejudice future development coming forward on neighbouring sites. The proposed rear buildings, on balance would read as single storey with roof accommodation. However, these dwellings would take a large proportion of the rear garden and would have a gabled roof formation which would create a bulky and dominating environment. These dwellings would sit less than 15m away from the rear of the dwellings at no.7-9 Arkwright Road (noting these are not built although the proposed site plan includes this permission). The overall height of the roof would be similar to the main walls of the dwelling and would have several dormers (front and rear) on the

roof. The front central dormer/gable would appear incongruous, overbearing and dominant. This would create an uncomfortable and cramped environment and contribute towards the overly hardsurfaced nature of the proposal and emphasises too much development/built form is being proposed.

- 5.15 The material palette would largely comprise of red/orange brickwork with Marley Brown Roof tiles. The balconies would have black railings with the doors and windows in white aluminium window. The front block would contain PermaRock Nano-Quartz self cleaning render. This would cover a large portion of the building on the basis of robust self-cleaning details (controlled at condition), this could be acceptable alongside all materials listed within the submission. These materials are seen in the context of the area. For a more authentic Arts & Crafts detail/feature, these should not be boxed out/have a soffit.
- 5.16 Overall, taking the backdrop need for housing, the proposal would constitute a development that would be too much for the site to tolerate. The sheer quantum of built form and hardstanding would result in the buildings/communal spaces appearing cramped, dominant and excessive. The architectural expression and design of the rear buildings would be incongruous, overbearing and dominant.

Neighbouring Amenity Impact

5.17

No.53 (east)

- 5.18 The front flatted block would sit adjacent to no.53 with an approx. 6.7m separation between the buildings. The closest part of the front building would extend approx. 2.8m beyond the rear building line but would not break the 45 degree line of view in plan and elevation. The rear building would be angled away from the adjacent neighbour with an approx. 27m separation distance. No concerns would be raised to this occupier.

No.49 (west)

- 5.19 The front flatted block would sit adjacent to no.49 and would have a separation of 11.5m to the side of the building (upper level) and 7.3m from the proposed building to the adjacent side extension. The total depth beyond no.49 would be approx. 7.5m although the separation distance between the properties and noting the existing

dwelling is sited more closely to no.49 would mitigate any detrimental impact to these occupiers. The submitted plans show 45 degree compliance in plan and elevation. There would also be approx. 30m building to building separation from the rear development to no.49, noting this relationship would not be direct.

- 5.20 Bedroom 3 of flat 4 at first floor would have its sole outlook facing no.49 although this window would be high level. As such, overlooking concerns would not be caused. Regardless of this window being enlarged (to improve the outlook for the occupiers which would be poor as submitted), it is considered that the separation distance to the common boundary and especially as this window would look towards the side of the building and not rear garden would be acceptable in any event.
- 5.21 The proposed access drive along the side of no.49 has the potential to create noise and disturbance with its use. The usage would largely be for the rear development although it is of the view that protective sound proof boundary treatment alongside high quality landscaping could help mitigate any potential concerns (controlled at condition stage). No concerns would be raised to these occupiers.

Existing Morley Road and Arkwright Properties

- 5.22 There would be approx. 30m separation distance from the rear of the Morley Road properties to the site boundary. An approx. 58m separation distance from the existing Arkwright Road properties. The separation distance would mitigate any potential neighbouring harm to these occupiers.

The Extant Permission – 3 single storey rear dwellings

- 5.23 Whilst this development is not part of the existing character, its permission is a material consideration and so are the merits of Section 2.4.4 of the SPD. To date, there is no evidence of a material start but this still does not rule out any potential development on this site (re-submission) coming forward. Any development on the host site must be designed around this permission. As such, the proposals must retain a minimum of 18m separation distance or in any case the gap being closer, the proposed building (rear development) must sit subserviently – so this normally means a storey less/sufficiently lower.
- 5.24 House 1 of the adjacent permission would look out onto the parking court to the centre of the host site. An approx. 15m separation distance. Given this relationship, no concerns would be raised. It should be noted that flats 3 and 5 would look out onto the rear communal area and would have views into the garden of house 1. There would be a 10m separation to the common boundary noting their garden would only be 14.5m in depth. Section 2.9 and Policy DM10.6 of the CLP states that the first 10m of adjacent and nearby gardens are afforded protection from any overlooking. Developments should be sited and designed to avoid this situation. Whilst technically the siting of the front block would break partially the 10m of house 1, it is considered on balance that the levels of overlooking would not be detrimental, especially given the presence of a mature protected specimen along the boundary. The siting of the subject flats within the building would help mitigate the overlooking concern being detrimental.
- 5.25 House 2 would be separated by the proposed rear building by approx. 12.7m. This would be substantially close and given the gabled and bulky design of the proposed

rear building including proximity, this would result in substantial harm to this occupier in terms of outlook, overbearing impact, sense of enclosure, visual intrusion and potential loss of daylight/sunlight, in particular within the garden. Part of house 2 would have views into the garden of the proposed rear dwellings. Whilst certain sole habitable rooms may not have a detrimental impact, the overall siting, scale and massing of the rear dwellings (including close proximity) would be detrimental to the occupiers of house 2. The scheme has not demonstrated as per paragraph 5.17 that the proposed rear development would not harm the occupiers of the adjacent permission.

5.26 House 3 would not have direct views to the rear development.



Figure 1: Extant Permission in the Context of the Site and Proposal

Sub-Conclusion

- 5.27 In terms of noise and disturbance, this development would reflect the typical residential setting of the area. The proposed access drive also has potential to create noise and disturbance. A pre-commencement condition requiring full details of construction and mitigation would have been attached had the scheme been considered acceptable. Furthermore, any hard and soft landscaping condition would have requested any boundary treatment erected to install some form of noise mitigation measures.
- 5.28 Any upper floor side windows of the proposed development would have required to be obscure glazed and non-opening unless the parts of the window which can be opened are more than 1.7 metres above the floor of the room in which the window is installed. This is so that overlooking and privacy concerns are not raised.
- 5.29 Overall, taking into account the backdrop need for housing, the proposed development would result in substantial harm to the potential occupiers of the neighbouring extant permission to the rear of no.7-9 Arkwright Road. Whilst not materially started, this is a material consideration to which the proposal, at the scale,

massing and siting proposed would prejudice any future redevelopment of this site coming forward.

Standards of Accommodation

- 5.30 Policy SP2.8 of the CLP states that the Council will seek to ensure new homes will require all new homes to achieve the minimum standards set out in the Mayor of London Housing Supplementary Planning Guidance and National Technical Standards (2015) (NDSS (2015)). It would also ensure that all new homes designed for families meet minimum design and amenity standards. Table 3.3 of the LP sets out the minimum floor areas which should be provided for new housing.
- 5.31 A one bedspace single bedroom must have a floor area of at least 7.5sqm and be at least 2.15m wide. A two bedspace double (or twin) bedroom must have a floor area of at least 11.5 sqm. One double (or twin bedroom) must be at least 2.75m wide and every other double (or twin) bedroom must be at least 2.55m wide.
- 5.32 Flats 2 and 4 of the front flatted block are listed as 3b 5p although would contain two single rooms and therefore classed as 3b 4p. Regardless of this error, they would meet the minimum GIA. Flat 3 is proposed to be 2b 3p although both rooms would be over 11.5sqm and therefore classed as double. This flat would then require a minimum GIA of 70sqm to which the proposed 68sqm would fall under. As per the design section, whilst the rear dwellings are listed as being single storey, the general form, proportion and massing including the section drawings would classify this development as being fully two storeys. The top floor is not considered to be sufficiently designed to rear as being 'roof level'. The two bedrooms of each house would be over 11.5sqm and therefore not '2 bedroom 3 person dwellings.' The dwellings would require, over two storeys to have a minimum GIA of 79sqm to which all the rear dwellings would fall below. This would be sub-standard and unacceptable.
- 5.33 The London SDG states that single aspect, north facing units must be avoided. All units would be dual/triple aspect.
- 5.34 Policies DM10.4 and DM10.5 of the CLP require all flatted developments to provide functional and high quality private and communal amenity space, in addition to child play space. Each unit would have private amenity in the form of gardens or integrated balconies which would be acceptable in terms of provision. 60sqm of communal/play area behind flat 1 is proposed for all occupiers of the development. Whilst sufficient in terms of provision, this area would be overly cramped and boarded tightly to the front flatted block. Furthermore, the mature and protected tree within no.7-9 Arkwright Road would also overshadow this area making it feel unwelcoming and isolated. The proximity of the private garden of flat 1 to this area would be too close. Regardless of any hedgerow screening, this relationship would be too tight and is likely to result in privacy and noise/disturbance concerns.
- 5.35 The starting point is for cycle storages to be made integral. The flatted block would have a storage to the front with the rear houses having separate external storage in the gardens. This is supported in principle. Whilst in provision terms this would be acceptable, a direct connection from the front door to this storage is needed rather than having to go onto the pavement then up the demarcated access along no.53. This is overly convoluted.

- 5.36 The sole refuse store would be external and would sit adjacent to the front building. Ideally the storage should be integrated into the building and in any event of being external, it should blend into the landscaping. The current storage is unlikely to comply with the drag distances (below 30m) given the convoluted location – they would need to walk onto the pavement and up a dangerous (as proposed) access drive which has no demarcated pedestrian/occupier path. Furthermore, the storage would open out onto the access drive meaning residents would have to stand along the access drive. This is far too dangerous and has not been well considered from an occupier perspective. Cyclists, in particular for the rear development would manoeuvre along this access drive – as proposed, would be far too dangerous. It is crucial that for any rear developments a demarcated and separate occupier access is provided so future residents do not have to walk/cycle up an access drive. As per the highways section, the general clarity and lack of information about visibility/pedestrian splays would further make the development dangerous for future occupiers.
- 5.37 As mentioned in the neighbouring amenity section, flat 4 at first floor would have a high level window serving bedroom 3. This is unacceptable as it would mean poor outlook from this habitable window. Bedroom 2 of flat 6 would only have rooflights – this would be poor for outlook and potential access to ventilation/daylight and sunlight. This is a poor internal arrangement. Flat 2 at ground level would have a side window but would be larger in size. This would look out onto a patch of soft landscaping and as this is not to be used for any communal spaces or access path, concerns of privacy would not be raised.
- 5.38 Policy D7 of the LP requires 10% of new-build housing to be “wheelchair user dwellings” (Building Regulation M4(3)) and the remainder “accessible and adaptable” (Building Regulation M4(2)). To achieve these requirements, step free access is required. In exceptional circumstances flexibility may be applied to buildings of four or fewer storeys, subject to robust justification being provided with a full viability assessment (in line with Policy D7 of the LP and the guidance in the Housing SPG – p76-78). A central and level link from the front to the rear is proposed for the front block which is positive. However, there is no demarcated occupier path from the pavement to the building or to the rear dwellings which is very important. The site appears flat (according to the Topographical Survey and site visit) and it is proposed to have the ground floor flats as M4(2) compliant which is positive. The rear houses would be M4(2) compliant which is positive. Had the scheme been considered acceptable, flexibility could probably have been applied to the four upper floor units – the London Plan includes flexibility in exceptional circumstances – as a lift would only serve a small number of units it would have a disproportionate impact on viability and attractiveness of these units for future occupiers.
- 5.39 Following the approach set in the London Plan (2021) to address the unique heat island effect of London and the distinct density, a minimum ceiling height of 2.5m for at least 75% of the gross internal area is required so that new housing is of adequate quality, especially in terms of light, ventilation and sense of space. At national level, 2.3m over 75% is considered to be the minimum. This would be achieved.
- 5.40 Overall, taking into account the backdrop need for housing, the proposed development, would result in sub-standard and poor quality accommodation, convoluted and dangerous environment as well as a cramped and isolated communal/play area.

Highways and Parking

5.41

Vehicular Parking

- 5.43 The LP sets out maximum car parking standards for residential developments based on Public Transport Accessibility Levels (PTAL) and local character. The new LP states that within outer London areas with PTAL 0-1, up to 1.5 spaces per dwelling is required. For the proposed scheme, the LP maximum requirement would be 13.5 spaces. The scheme proposed 8 spaces for the 9 units. Parking stress surveys in accordance with the Lambeth Methodology were undertaken which concluded existing spare capacity of at least 118 unrestricted parking spaces within the survey area, with a current highpoint occupancy across both survey periods of just 8.5%.

Vehicular Crossover and Parking Arrangements

- 5.44 The existing crossovers would be reinstated and replaced with a central crossover and one along the side of no.49 – access drive. The vehicle access adjacent to no.49 is not acceptable, as this would remove area where pedestrians can stand safely and where utilities and street furniture can be placed. In addition, the required pedestrian sightlines of 1.5x1.5m minimum either side of the vehicle access point within the site boundary have not been achieved. The vehicle accesses can be a maximum of 4.5m dropped, flat section and 0.5m ramps either side if required. 6m is too wide for the central crossover and the boundary opening must be the same width as the vehicle access point. Furthermore, the crossover adjacent to no.49 of 3.7m is too small to safely allow vehicles to manoeuvre to and from the site. There is no passing area within the frontage and as a result would lead to potentially vehicles having to reverse out onto the highway if another vehicle is exiting the site – this is unacceptable.
- 5.45 Swept paths for all parking spaces have been undertaken with a 4.8m car however, it can be clearly seen that the parking spaces cannot be accessed independently in this layout as some of the manoeuvring is over adjacent parking spaces which cannot occur if they are occupied, over landscaping and outside the width of central crossover specified above. This further emphasises a cramped and overdeveloped approach to the site.
- 5.46 Relevant conditions regarding EVCPs, boundary treatment, landscaping and condition surveys would have been attached had the scheme been considered acceptable.

Cycle Parking

- 5.47 Policy T6 of the LP states that developments should provide secure, integrated, convenient and accessible cycle parking facilities in line with the minimum standards

set out in Table 6.3 and the guidance set out in the London Cycle Design Standards (or subsequent revisions). Policy DM10.2 of the CLP states that the Council will support proposals that incorporate cycle parking within the building envelope, in a safe, secure, convenient and well-lit location. Failing that, the Council will require cycle parking to be located within safe, secure, well-lit and conveniently located weather-proof shelters unobtrusively located within the setting of the building.

- 5.48 The cycle storage for the flats is within the building envelope at the front which is acceptable however, it requires a minimum 1.2m footpath to allow a cycle to be taken to the store and a 2m aisle to be able to take the cycle off the rack, although the type of rack shown, wall hung/vertical is not acceptable. 50/50 mix of sheffield stands and two tier stands would be acceptable with at least one sheffield stand allowing for a wider or adapted bike to be secured. LCDS and Cambridge residential cycle design guide which is held as best practice must be used for the design and layout of the store. Electric sockets and lighting would also be required in the store. The storages within the rear houses are acceptable in terms of siting and provision. Had the scheme been considered acceptable, a revised site plan amending the layout to be less convoluted would have been requested alongside pre-commencement conditions. However, officers are not convinced that this could be easily amended in light of the concerns raised on other grounds.

Refuse and Recycling

- 5.49 Policy DM13 of the CLP states that to ensure that the location and design of refuse and recycling facilities are treated as an integral element of the overall design, the Council will require developments to...Sensitively integrate refuse and recycling facilities within the building envelope, or, in conversions, where that is not possible, integrate within the landscape covered facilities that are located behind the building line where they will not be visually intrusive or compromise the provision of shared amenity space.
- 5.50 The Council Waste and Recycling in Planning Policy (2015) states that per unit, it is recommended that space is allocated for 2x240-litre bin, 1x180ltr bin, food caddies and possibly garden recycling 240ltr or 140ltr bin. The dimensions of all standard bin sizes are included in Appendix A. Furthermore, it is stated that the drag distance for collection operators is 20m and that the carry distance for occupiers is 30m maximum.
- 5.51 The refuse/recycling area is too far from the public highway for collections. The furthest bin in the store must be 20m from the rear of the collection vehicle which it currently is not. It is likely this would be the case when you factor in the convoluted layout. In addition to that residents have to stand in the access road to put their refuse in the bins which is not acceptable. The houses require individual refuse and recycling as per the waste management New Builds and Conversions document on the council website. 10sq.m bulky goods area is also required within 20m of the carriageway via a level surface. The current siting is unacceptable. The siting of the storage will also be in excess of 30m for all flats – given the convoluted layout which means taking the storage through the front car park, then onto the pavement and then up the access path. It would not be ideal to drag the storage over the soft landscaping in front of flat 2.

- 5.53 Overall, taking into account the backdrop need for housing, the proposed development, by reason of the poor and convoluted/cramped site layout including siting of refuse/cycle storage, poor visibility/sightlines throughout the site, narrow and dangerous access drive which also lacks any passing area to the front crossover would result in a detrimental impact to the highway safety and pedestrian environment of the area.

Landscaping, Trees and Ecology

Landscaping

- 5.54 A landscape strategy has not been provided although the proposed site plan gives an indication of hard and soft landscaping with some details of planting and play equipment. As mentioned in the design section, the site would result in too much built form and hardstanding which would diminish the verdant setting of the site and constitute a cramped form of overdevelopment.

Trees

- 5.55 An Arboricultural Report alongside a photo log of trees by JN consultancy has been submitted in support of the application. The field survey shows 6 trees and two groups within/surrounding the site. T1 and T3 (both off site) are situated within the curtilage of no.7-9 Arwright Road and protected by TPO 52 of 2007. T1 is sited in very close proximity to the host site and proposed front flatted block. These trees have been classified as B grade by the applicant's consultant. There is a group of trees – G1 consisting of Apple and plum along the western boundary of the site (Morley Road properties) which are also Category B. The rest of the field survey trees are all C or U grade which includes the front trees along the boundary of no.49. It is proposed to remove T2 (U grade) and G1 (B grade) to accommodate the proposal. No trees are proposed to be pruned. In terms of RPA incursions, T1 would have an approx. 10% incursion with T3 having 2.4% - the two off site protected trees. It is proposed to have protective fencing around these particular trees. The front trees along the boundary of no.49 would largely result in hardsurfacing with the access drive – it is proposed to have temporary ground protection around these C grade trees. The general level of incursion into the RPAs is considered to be acceptable subject to the protection measures put in place during construction. Furthermore, the removal of T2 and G1 is considered acceptable but only on the basis of net gain of tree planting. The proposed site plan is not sufficiently detailed but does indicate a variety of proposed planting and 2 Kanzan Cherry Blossom Trees – the principle re-planting is considered to be sufficient to mitigate loss of existing planting.
- 5.56 However, as formed as a design reason and mentioned above, there would be too much hard standing with very little area for further tree planting and soft landscaping, for the proposed approach and layout. Whilst on balance the impact on arboricultural grounds could be acceptable subject to hard/soft landscaping conditions and full tree

survey compliance conditions, it does still not rule out that there would be too much development being proposed.

Ecology

5.57 An Ecological Appraisal (Arbtech, 2021) and Preliminary Roost Assessment and Bat Emergence and Re-entry Surveys report (Arbtech, 2021b) has been submitted relating to the likely impacts of development on designated sites, protected species and Priority species & habitats. The mitigation measures will include but are not restricted to: the inclusion of native species planting; a variety of fruiting and flowering species should be included to provide additional foraging and resting habitat for animals and invertebrates, a wildflower meadow area, gaps in fencing for connectivity for hedgehog, wildlife friendly lighting scheme, bat and bird boxes and creation of reptile hibernacula. As such, had the scheme been considered acceptable, a compliance condition requiring the installation of the measures would have been attached alongside pre-commencement conditions requiring Construction Environmental Management Plan, Biodiversity Enhancement Strategy and Wildlife Sensitive Lighting Design Scheme.

5.58

Flooding

5.59

5.60 A very basic Flood Risk Assessment (FRA) by Jameson has been submitted with the application. No surface water drainage strategy has been submitted although the FRA states 'Any additional surface water on the new roof will be directed to a new soakaway(s) located a minimum 5m from the properties, with enough capacity to meet the requirement of the additional roof space, and/or the surface water will be directed into an existing surface water drain. Subject to a building inspectors' onsite approval.' The use of a soakaway is positive in principle but officers need a robust drainage strategy including

for up to the 1in100yr+40%cc event. A pre-commencement condition could have been attached had the scheme been considered acceptable.

Sustainability

5.61 The proposal would need to comply with the Energy Hierarchy of the London Plan (2021). Minor residential applications would need to achieve a 19% carbon emission above the 2013 Building Regulations.

5.62 In addition, residential properties would need to achieve a rate and a water use target of 110L per head per day.

5.63 Had the scheme been considered acceptable, conditions would have been attached.

Conclusions and Planning Balance

- 5.64 Whilst the intensification of the site into flatted units is supported, in principle, the proposal development would bring an ample amount of negative features that would be unacceptable.
- 5.65 The scheme would fail to deliver the strategic target of 30% new homes being family sized (3 bedroom +).
- 5.66 The proposal would constitute a cramped form of overdevelopment that would be too much for the site to tolerate. The sheer quantum of built form and hardstanding would result in the buildings/communal spaces appearing cramped, dominant and excessive. The architectural expression and design of the rear buildings would be incongruous, overbearing and dominant.
- 5.67 The proposed development would result in substantial harm to the potential occupiers of the neighbouring extant permission to the rear of no.7-9 Arkwright Road. Whilst not materially started, this is a material consideration to which the proposal, at the scale, massing and siting proposed would prejudice any future redevelopment of this site coming forward.
- 5.68 The proposal would result in sub-standard and poor quality accommodation, convoluted and dangerous environment as well as a cramped and isolated communal/play area. The proposed access drive would be far too dangerous for future occupiers and the users of the highway and pedestrian network. The overall site layout would be too cramped for manoeuvring alongside poorly sited refuse/cycle storages and poor visibility/sightlines throughout the site.
- 5.69 Whilst the delivery of some ‘family’ sized accommodation is respected and weighted significantly, the overall harm as identified throughout the report would not be outweighed.
- 5.70 As such, the proposal would not comply with the relevant Policies within the London Plan (2021), Croydon Local Plan (2018) as well as the Croydon Suburban Design Guide (2019).

6. OTHER MATTERS

- 6.1 All other planning considerations including equalities have been taken into account.

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