

**1.0 SUMMARY OF APPLICATION DETAILS**

Ref: 19/03965/FUL  
 Location: 8 Coulsdon Road, Coulsdon, CR5 2LA  
 Ward: Old Coulsdon  
 Description: Demolition of the existing property and erection of six new apartments and 2 houses (houses to front Petersfield Crescent), with associated new access, parking, refuse and cycle stores and landscaping.  
 Drawing Nos: 33-P2-3, 33-P2-4 Rev O, 33-P2-5 Rev E, 33-P2-6 Rev G, 33-P2-7 Rev D, 33-P2-8 Rev F, 33-P2-9 Rev G, 33-P2-10 Rev G, 33-P2-11 Rev K, 33-P2-12 Rev F, 33-P2-14 Rev A and 33-P2-16 Rev D  
 Applicant: Sterling Rose  
 Agent: Sterling Rose  
 Case Officer: Samantha Dixon

	1 bed	2 bed	3 bed	4 bed	5 bed
<b>Existing</b>			1		
<b>Proposed flats</b>	3	3	2		

*All units are proposed for private sale*

Number of car parking spaces	Number of cycle parking spaces
4	14

1.1 This application is being reported to committee because the ward councillor (Councillor Margaret Bird) and Hartley & District Resident’s Association have made representations in accordance with the Committee Consideration Criteria and requested committee consideration and objections above the threshold in the Committee Consideration Criteria have been received.

**2.0 RECOMMENDATION**

2.3 That the Director of Planning and Strategic Transport has delegated authority to issue the planning permission and impose conditions and informatives to secure the following matters:

**Conditions**

1. Time limit of 3 years
2. Development to be carried out in accordance with the approved drawings and reports except where specified by conditions
3. Construction Logistics Plan to be submitted
4. Details of site specific SuDS to be submitted
5. Protection measures for retained hedge and street trees to be submitted
6. Submission of Drainage Strategy as required by Thames Water
7. Details of materials to be submitted

8. Hard and soft landscaping including boundary treatment, retaining walls and maintenance to be submitted
9. Details of electric vehicle charging point to be submitted
10. Details of children's playspace to be provided
11. Accessible units to be provided
12. Accesses to be provided and existing reinstated prior to occupation
13. Car and cycle parking provided as specified
14. Obscured glazing to flank windows
15. No other openings in flank elevations
16. 19% Carbon reduction
17. 110litre Water usage
18. 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) Ecology consideration
- 4) Highway works
- 5) Accessible units
- 6) Any other informative(s) considered necessary by the Director of Planning and Strategic Transport

2.4 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.

## **3.0 PROPOSAL AND LOCATION DETAILS**

3.1 The proposal includes the following:

- Demolition of existing house
- Erection of a three storey building with accommodation in roof to create 6 residential units (3 x 1 bedroom and 3 x 2 bedroom units) with provision of communal external amenity space and children's play space
- Erection of 2 x two storey semi-detached houses with accommodation in roof space (3 bedrooms) with private gardens
- Provision of 4 off-street parking spaces
- Provision of associated refuse and cycle stores

3.2 During the course of the application amended plans have been received to: Alter the internal layout of the flatted development to ensure that all units have private amenity space and adequate outlook and access to light; repositioning of side dormer window to front elevation; Loss of lower ground floor of the dwellings fronting Petersfield Crescent and amended design; Relocation of bin stores; Additional information regarding land levels.

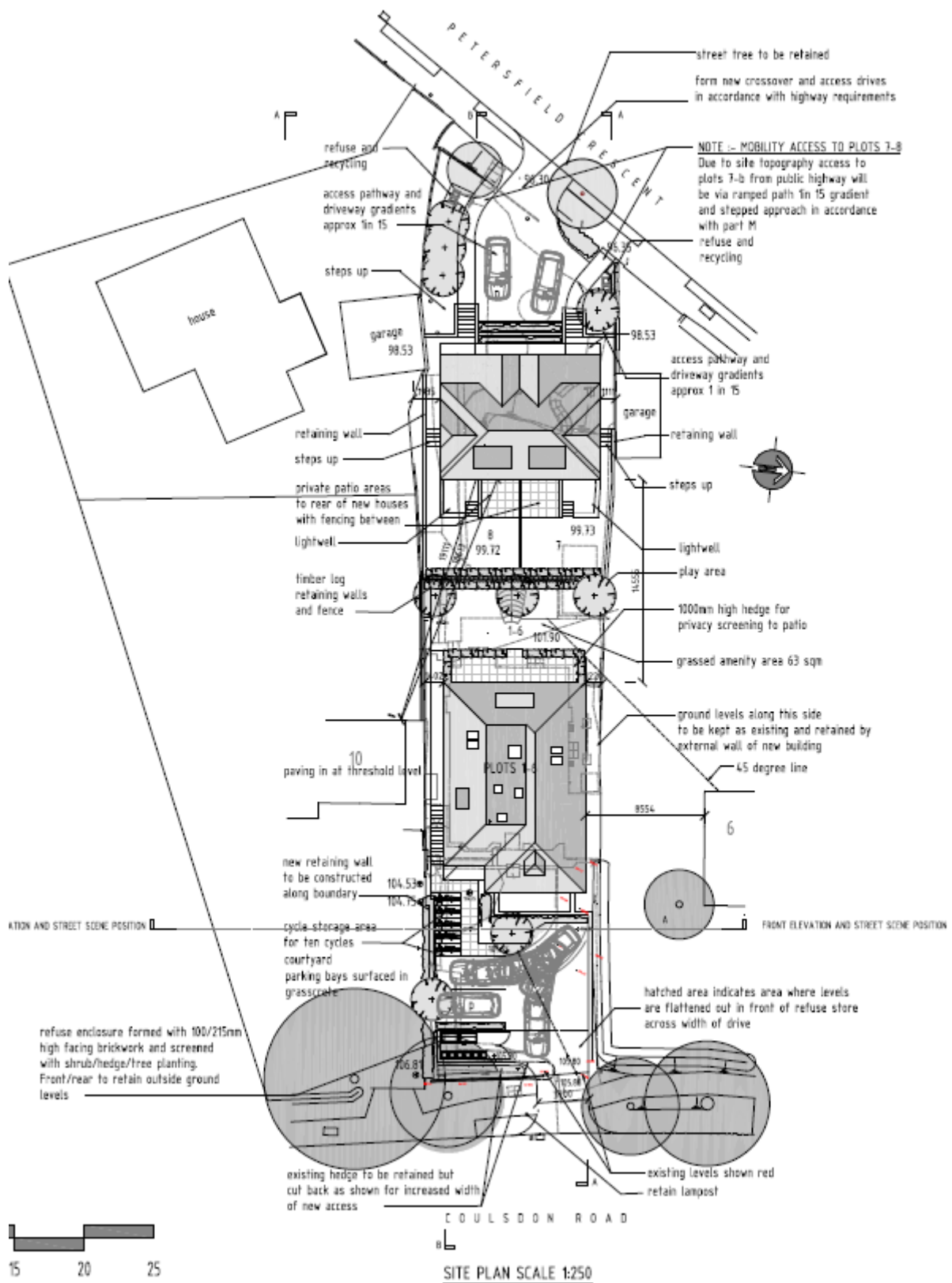


Figure 1 Proposed site plan

## Site and Surroundings

- 3.3 The site comprises a single storey detached dwelling located to the west side of Coulsdon Road, opposite the junction with Hartley Down. The house sits at a lower level than the highway and the levels across the site fall significantly from east to west.

The dwelling has a large rear garden of approximately 400sqm in size. The rear garden of the property backs onto Petersfield Crescent and there is an existing dropped kerb from this road however it is noted that it is not in use.

- 3.4 This is a predominantly residential area with an array of dwelling types present. Dwellings on Coulsdon Road are detached and semi-detached and vary in appearance, being mostly two storey in height. Plot sizes are also very varied. Properties on the north west side of Petersfield Crescent are two-storey semi-detached all of a similar appearance and era. Detached infill dwellings have been erected to the south east side of the road, to the south of the proposed application site.
- 3.5 There are no specific policies relating directly to this site however it is noted that it is an area at low risk of surface water flooding and potential for groundwater flooding. The site has a PTAL of 2 indicating relatively poor access to public transport.



Figure 2 Aerial street view highlighting the proposed site within the surrounding streetscene

### Planning History

- 3.5 82/01463/P Erection of garage in rear garden with access onto Petersfield Crescent. Granted 12.10.1982
- 3.6 97/00333/P Erection of single storey front extension and alterations to roof including provision of front and rear dormers. Granted 13.03.1997
- 3.7 18/05180/PRE New residential development to create 9 units. It was summarised that residential development of the site is acceptable in principle. Concerns were raised to the quality of amenity for the proposed flatted block, the appearance of the dwellings fronting Peterfield Crescent, inadequate highway information being provided.

3.8 Application at 2 Coulsdon Road 19/03003/FUL Demolition of existing dwelling and erection of new building to create 9 flats with associated car and cycle parking provision, refuse storage and landscaping. Granted permission by Planning Committee on 6<sup>th</sup> February 2020.

#### 4.0 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The principle of the development is acceptable given the residential character of the surrounding area.
- The proposal creates three family sized units
- Amended plans have been received to ensure that the buildings respect the character of the surrounding area.
- The living conditions of adjoining occupiers would be protected from undue harm.
- The living standards of future occupiers are satisfactory and Nationally Described Space Standard (NDSS) compliant.
- The level of parking and impact upon highway safety and efficiency is considered acceptable and can be controlled through conditions.
- 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.

##### Thames Water

5.2 With the information provided Thames Water has been unable to determine the waste water infrastructure needs of this application. Should the Local Planning Authority look to approve the application a condition should be attached requiring a drainage strategy detailing any on and/or off site drainage works to be submitted and approved with the local planning authority in consultation with the sewerage undertaker. [OFFICER COMMENT: A condition is recommended]

#### 6.0 LOCAL REPRESENTATION

6.1 The application has been publicised by 13 letters of notification to neighbouring properties in the vicinity of the application site. The number of representations received from neighbours in response to notification and publicity of the application are as follows:

No of individual responses:    Objecting:    60    Supporting:       Comment: 0

6.2 The neighbours were renotified with regard to the amended plans and 9 objections (included in the total above) were received.

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

Objection	Officer comment

<i>Design and appearance</i>	
Overdevelopment of the site/high density	Addressed in Section 8.22 of this report.
Out of keeping with existing development in the area in terms of height and bulk. Three/four storey out of keeping on two storey area. Intrusive design.	Addressed in Section 8.8 – 8.23 of this report.
Petersfield Crescent is a small road with 16 houses and the new units will change the character entirely	Addressed in Sections 8.16 - 8.20 of this report.
Four storeys give the narrow semi-detached properties a townhouse look, which will appear cramped and incongruous with the prevailing streetscape.	The design of the proposed houses fronting Petersfield Crescent have been amended during the course of the application. Addressed in Sections 8.16 - 8.20 of this report.
Blocks of flats are out of keeping in the area, contrary to Policy DM37.	Planning policies and the Suburban Design Guide advocate infill development for new residential units in the suburbs. There is no objection to the principle of flatted development in this area.
<i>Impact on amenities of neighbouring properties</i>	
Overbearing impact on and loss of light and privacy to neighbouring properties	Addressed in Sections 8.34 - 8.50 of this report.
Extra pollution and noise disturbance	This is a residential development and there is no evidence or reason to suggest that the proposal would result in extra pollution or noise that is not associated with a residential area.
Loss of views	This is not a material planning consideration.
Inaccurate plans fail to present the position of adjacent dwellings	The plans have been amended to show the full extent of the adjacent dwellings.
May effect light to solar panels at 12 Petersfield Crescent	The closest part of the dwelling at No.12 is 32m from the front edge of the application site and located to the south west.
<i>Trees/Ecology/Environment</i>	
Loss of protected trees on Coulsdon Road to form the new access.	The trees on Coulsdon Road will not be affected by the development. Addressed in Sections 8.21 and 8.65 of this report.

Decimates the existing mature garden	Addressed in Section 8.21 of this report.
Loss of wildlife habitat	Addressed in Section 8.66 of this report.
Dramatically increase the carbon footprint of the area	Conditions will be imposed to ensure carbon emissions are compliant with policy and Building Regulations. Addressed in Section 8.62 of this report.
Overdevelopment of this nature contravenes the objective of maintaining air quality (DM23).	Conditions will be imposed to ensure carbon emissions are compliant with policy and Building Regulations. This is a residential development and there is no evidence or reason to suggest that the proposal would result in extra pollution or noise that is not associated with a residential area.
<i>Transport and parking</i>	
Inadequate parking provision will exacerbate parking problems on Petersfield Crescent. Increase parking problems due to new dropped kerb.	Addressed in Sections 8.51 – 8.55 of this report.
Lack of parking will cause cars to park on Coulsdon Road which would be dangerous. Adverse impact on highway safety and congestion. Exacerbate existing traffic problems at a busy and dangerous junction	Addressed in Section 8.53 of this report.
Dangerous access/egress. Cars reversing onto Petersfield Crescent is dangerous	Addressed in Section 8.59 of this report.
Increased traffic will cause more risk of accidents	Addressed in Section 8.58 – 8.59 of this report.
Traffic chaos during construction	A Constriction Logistics Plan will be required by condition.
Loss of parking will affect the shops on Coulsdon Road	The Transport Statement indicates that there is ample available on street parking in the surrounding streets and as such the proposal will not affect trade to the local shops. Additional local occupiers may be beneficial for trade.

Inadequate cycle and refuse storage. The cycle parking is not secure.	Addressed in Sections 8.57, 8.60 and 8.61 of this report. Full details of cycle storage will be secured by condition.
Given the hilly topography the site will not be attractive to cyclists. SDG 2.6.8 proposes the use of e-bikes in hilly areas. There is no indication that the proposed cycle racks contain charging points for e-bikes.	Cycle parking is shown to be provided in accordance with London Plan requirements.
No electric vehicle charging points proposed	This would be secured by condition
<i>Amenities of future occupiers</i>	
Too small, disproportionate sized gardens	Addressed in Section 8.27 of this report.
Not all flats have private amenity as required by policy and some are too small	The plans have been amended so that all units have private amenity areas, all of which accord with required standards. Addressed in Section 8.27 of this report.
The sunken courtyard to Flat 1 will provide unacceptable daylight	The courtyard to the front of Flat 1 has been removed from the scheme.
Inadequate playspace. Communal garden not accessible by wheelchair users	Addressed in Sections 8.28 and 8.30 of this report.
No affordable housing provision	This is a minor development and there is no policy requirement for affordable housing.
70% of houses should have 3 bedrooms. Doesn't accord with policy	The policy referred to is for major developments (10+ units). The proposal is compliant with Policy SP2.7 for family units. Addressed in Section 8.7 of this report.
Other matters	
Increase flood risk. Surface water flooding is already a problem the area	Policy DM25 requires all development to incorporate sustainable drainage techniques. A condition will be imposed requiring site specific SuDS to be provided. Addressed in Section 8.63 of this report
Pressure on existing sewerage system. A mains waterpipe runs under the site.	Addressed in Section 8.64 of this report



<p>It is not clear how the developer can excavate without disturbing the sewer (especially given the proposed changes to existing ground levels). The house at 16 Petersfield Crescent had to be re-sited on its plot due to the sewer location. There is no evidence of consultation with Thames Water regarding the location of sewers.</p>	
<p>Set precedence for other such developments in the area</p>	<p>There is no objection to the principle of infill residential development in this area. The proposal re-provides family housing in a residential area in accordance with Local Plan policy.</p>
<p>Multiple dwellings not allowed based on original 1932 deeds of the existing house</p>	<p>This is a private matter for the developer and is not a material planning consideration.</p>
<p>Extra strain on local services e.g. GPs and schools which are already unable to cope.</p>	<p>The application is CIL liable. Addressed in Section 8.67 of this report.</p>
<p>Devalue existing house prices</p>	<p>This is not a material planning consideration.</p>
<p>Cumulative impact with proposal at 2 Coulsdon Road 19/03003/FUL</p>	<p>Parking concern addressed in Section 8.55 of this report. Each development will provide suitable on-site sustainable drainage and each will provide CIL contributions.</p>
<p>There are sufficient apartments in Coulsdon already</p>	<p>There is no objection to the principle of infill residential development in this area. The proposal re-provides family housing in a residential area in accordance with Local Plan policy.</p>
<p>The plans do not appear to reflect accurately the irregular shape of the site at 8 Coulsdon Road. There is a note on the design regarding the need to take accurate measurements before work commences. A cursory look at this long and narrow plot of land (in person or using Google Maps satellite data) reveals boundaries that are not straight and a width that varies along the length of the plot. Accurate measurements should be taken before any decision is taken on the planning application since there is a significant doubt as to the feasibility of the current proposal.</p>	<p>Officers have visited the site and assessed the plans and are satisfied with the information provided.</p>

6.4 Cllr Margaret Bird (Old Coulsdon Ward Councillor) make representations, objecting to the proposal and referring it to Planning Committee:

- This site fronts both Coulsdon Rd and Petersfield Crescent.
- This application has a huge impact on residents in Petersfield Crescent as it is close to another application for 9 flats at No 2 Coulsdon Rd which also designed to front Petersfield Crescent so the impact must be taken into context with that as yet undecided application.
- The south side of the road on Petersfield Crescent is physically the higher side and the 3 storey houses will tower over the current homes unless the height is restricted, on the north side of the road impacting on their quality of life enjoyed for over 60 years by way of intrusion.
- The house next door is elevated but set well back from the road so reducing intrusion.
- 70% of new homes in this area should have 3 or more bedrooms given the PTAL rating according to the local plan but this development of 8 dwellings only has 3 less than half of 70%.
- Petersfield Crescent is a small road with just 16 homes and the increase in dwellings with the already proposed No 2 Coulsdon Rd will change the character completely.
- This is an area of family homes not flat dwellings and needs to be reflected in all of and proposals to maintain the character of Old Coulsdon ward.

6.5 Hartley and District Resident's Association have objected to the proposal and requested determination by Planning Committee:

- No affordable housing
- Only 1 x 3 bed unit proposed
- Blocks of four storey flats out of character
- Contemporary design, bulking and massing is too large, overbearing, out of scale and out of character
- Loss of bungalow
- Adverse impact on side windows of 6 Coulsdon Road
- Over development of the site
- Significant loss of wildlife habitat and green garden with most of the existing garden being built on or paved.
- A full survey of the site with level details should be provided to demonstrate the proposal will fit into the site as it would appear there are errors on the drawings.
- Four car parking spaces are insufficient. This will result in overspill parking onto Petersfield Crescent. Need to consider the development of 2 Coulsdon Road.
- No electric charge points are being provided for the four onsite car parking spaces. AI
- No disabled car parking is provided.
- Fails to provide a turning area to allow cars to access and egress the parking bays on Petersfield Road. Not demonstrated that adequate sightlines can be achieved for vehicles exiting the driveways taking into consideration the existing trees in the roadside verges.
- Additional noise

- A Health Impact Statement nor daylight assessment analysis have been provided for the new development.
- Too many housing units are being crammed into this small site which will result in substandard accommodation for the future occupiers
- A Demolition/Construction Logistics Plan has not been provided.
- The flood risk assessment concludes that a Sustainable Drainage Strategy (SUDS) should be developed for the Site. This has not been done.

## **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 and the determination shall be made in accordance with the plan unless material considerations indicate otherwise. The Council's adopted Development Plan consists of the Consolidated London Plan 2015, the Croydon Local Plan 2018 and the South London Waste Plan 2012.

7.2 Government Guidance is contained in the National Planning Policy Framework (NPPF), issued in February 2019. The NPPF sets out a presumption in favour of sustainable development, requiring that development which accords with an up-to-date local plan should be approved without delay. The NPPF identifies a number of key issues for the delivery of sustainable development, those most relevant to this case are:

- Promoting sustainable transport;
- Delivering a wide choice of high quality homes;
- Requiring good design.

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

### **7.4 Consolidated London Plan 2015**

- 3.3 Increasing housing supply
- 3.4 Optimising housing potential
- 3.5 Quality and design of housing developments
- 3.8 Housing choice
- 5.1 Climate change mitigation
- 5.2 Minimising carbon dioxide emissions
- 5.3 Sustainable design and construction
- 5.12 Flood risk management
- 5.13 Sustainable drainage
- 5.16 Waste net self sufficiency
- 6.3 Assessing effects of development on transport capacity
- 6.9 Cycling
- 6.13 Parking
- 7.2 An inclusive environment
- 7.3 Designing out crime
- 7.4 Local character
- 7.6 Architecture

- 7.21 Woodlands and trees

Policy 3.3 of the London Plan 2016 recognises the pressing need for more homes in London and Policy 3.8 states that Londoners should have a genuine choice of homes which meet their requirements for different sizes and types of dwellings in the highest quality environments. The impact of the draft London Plan is set out in paragraph 7.7 below.

#### 7.5 Croydon Local Plan 2018

- SP2 - Homes
- SP6.3 - Sustainable Design and Construction
- DM1 - Housing choice for sustainable communities
- SP4 – Urban Design and Local Character
- DM10 - Design and character
- DM13 - Refuse and recycling
- DM16 – Promoting healthy communities
- SP6 – Environment and Climate Change
- DM23 - Development and construction
- DM25 – Sustainable drainage systems and reducing floor 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

#### 7.6 There is relevant Supplementary Planning Guidance as follows:

- London Housing SPG March 2016
- Croydon Suburban Design Guide Supplementary Planning Document April 2019

#### 7.7 Emerging New London Plan

Whilst the emerging New London Plan is a material consideration, the weight afforded is down to the decision maker linked to the stage a plan has reached in its development. The Plan appears to be close to adoption. The Mayor's Intend to Publish version of the New London Plan is currently with the Secretary of State and no response had been submitted to the Mayor from the Secretary of State. Therefore, the New London Plan's weight has increased following on from the publication of the Panel Report and the London Mayor's publication of the Intend to Publish New London Plan. The Planning Inspectors' Panel Report accepted the need for London to deliver 66,000 new homes per annum (significantly higher than existing adopted targets), but questioned the London Plan's ability to deliver the level of housing predicted on "small sites" with insufficient evidence having been presented to the Examination to give confidence that the targets were realistic and/or achievable. This conclusion resulted in the Panel Report recommending a reduction in London's and Croydon's "small sites" target.

The Mayor in his Intend to Publish New London Plan has accepted the reduced Croydon's overall 10 year net housing figures from 29,490 to 20,790 homes, with the "small sites" reduced from 15,110 to 6,470 homes. Crucially, the lower windfall housing

target for Croydon (641 homes a year) is not dissimilar to but slightly larger the current adopted 2018 Croydon Local Plan target of 592 homes on windfall sites each year.

It is important to note, should the Secretary of State support the Intend to Publish New London Plan, that the overall housing target in the New London Plan would be 2,079 new homes per annum (2019 – 2029) compared with 1,645 in the Croydon Local Plan 2018. Therefore, even with the possible reduction in the overall New London Plan housing targets, assuming it is adopted, Croydon will be required to deliver more new homes than our current Croydon Local Plan 2018 and current London Plan (incorporating alterations 2016) targets.

For clarity, the Croydon Local Plan 2018, current London Plan (incorporating alterations 2016) and South London Waste Plan 2012 remain the primary consideration when determining planning applications.

## **8.0 MATERIAL PLANNING CONSIDERATIONS**

8.1 The main planning issues raised by the application that the Planning Committee are required to consider are as follows:

1. Principle of development
2. Townscape and visual impact
3. Housing quality for future occupiers
4. Residential amenity for neighbours
5. Access and parking
6. Sustainability and environment
7. Other matters

### **Principle of Development**

8.2 This application must be considered against a backdrop of significant housing need, not only across Croydon, but also 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 London Borough of Croydon, there is a requirement to deliver a minimum of 32,890 new homes between 2016 and 2036 (Croydon's actual need identified by the Croydon Strategic Housing Market Assessment would be an additional 44,149 new homes by 2036, but as there is limited developable land available for residential development in the built up area, it is only possible to plan for 32,890 homes). This requirement is set out in policy SP2.2 of the Croydon Local Plan (CLP) (2018), which separates this target into three relatively equal sub targets with 10,760 new homes to be delivered within the Croydon Opportunity Area, 6,970 new homes as identified by specific site allocations for areas located beyond the Croydon Opportunity Area boundary and 10,060 homes delivered across the Borough on windfall sites. The draft London Plan, which is moving towards adoption (although in the process of being amended) proposes significantly increased targets which need to be planned for across the Borough. In order to provide a choice of housing for people in socially-balanced and inclusive communities in Croydon, the Council will apply a presumption in favour of sustainable development of new homes.

8.3 The site sites on the border between the Coulsdon/Old Coulsdon. The "Places of Croydon" section of the CLP (2018) identifies Coulsdon as an area of moderate residential growth based on available land whereby residential development will

respect the existing character and local distinctiveness. Kenley and Old Coulsdon is defined as an area of sustainable growth of the suburbs, with some opportunity for windfall sites will see growth mainly by infilling with dispersed integration of new homes respecting existing residential character and local distinctiveness.

- 8.4 The Croydon Suburban Design Guide (2019) sets out how suburban intensification can be achieved to high quality outcomes and thinking creatively about how housing can be provided on windfall sites. As is demonstrated above, the challenging targets will not be met without important windfall sites coming forward, in addition to the large developments within Central Croydon and on allocated sites.
- 8.5 The application is for a flatted development providing additional homes within the borough, which the Council is seeking to promote. The site is located within an existing residential area and as such providing that the proposal respects existing residential character and local distinctiveness, and accords with all other relevant material planning considerations, the principle of development is supported.
- 8.6 CLP Policy DM1.2 seeks to prevent the net loss of 3-bedroom homes (as originally built) and homes less than 130m<sup>2</sup>. The existing building on site is a 3 bedroom house with a floor area of approximately 107sqm. All of the proposed units have floor spaces of less than 130sqm and 2 of the new units would comprise three bedrooms. There would therefore be no net loss of homes under 130sqm or three-bedroom homes as required by Policy DM1.2.
- 8.7 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. CLP policy goes on to say that within three years of the adoption of the plan, an element may be substituted by two-bedroom (four person) homes. The application proposes 2 x 3 bedroom units and 1 x 2 bedroom 4 person unit. Overall, the proposal provides a net gain in family accommodation (37.5%) and contributes towards the Councils goal of achieving a strategic target of 30% three bedroom plus homes.

### **Townscape and Visual Impact**

- 8.8 This is a predominantly residential area with an array of building types present. Dwellings on Coulsdon Road are detached and semi-detached and vary in appearance, being mostly two storey in height with pitched roofs. Properties on the north west side of Petersfield Crescent are two-storey semi-detached all of a similar appearance and era. Detached dwellings to the south east side of the road vary in building line, mass and height. The buildings mostly have red/brown tiled roofs and there are an array of materials to the elevations including render, mock-tudor, brick and hanging tile.
- 8.9 The existing building on site was erected in the 1930's and benefitted from extensions to the front elevation in the 1990s. The building does not hold any special significant architectural merit and therefore there is no objection to its demolition.
- 8.10 CLP Policy DM10.1 states that proposals should achieve a minimum height of 3 storeys whilst respecting a) the development pattern, layout and siting; b) the scale, height, massing and density; and c) the appearance, existing materials and built and natural features of the surrounding area.

8.11 The Suburban Design Guide suggests appropriate ways of accommodating intensified development on sites and suggests that where surrounding buildings are predominantly detached dwellings of two (2) or more storeys, new developments may be three (3) storeys with an additional floor contained within the roof space or set back from the building envelope below, see diagram below.



Figure 2.10c: Where surrounding buildings are predominantly detached dwellings of two (2) or more storeys, new developments may be three (3) storeys with an additional floor contained within the roof space or set back from the building envelope below.

8.12 The proposal is for two buildings, one facing Coulsdon Road and one facing Petersfield Crescent.

#### Coulsdon Road building

8.13 The building facing Coulsdon Road is a three storey building with a fourth floor of accommodation contained in the roofspace. The building utilises existing ground levels to provide a lower ground floor level. From the front elevation, the lower ground floor would not be visible, the building appearing as a two storey building with a pitched roof which is comparable with other dwellings to this side of Coulsdon Road. The building would have a higher overall ridge height than the dwellings either side, however given the changes in ground level across the sites and the variation in building type, it is considered that the height respects that of buildings in the area.



Figure 3. Street elevation on Coulsdon Road



Figure 4. Proposed CGI from Coulsdon Road

- 8.13 The footprint of the proposed building is comparable with the existing bungalow on site, the existing building footprint being 120sqm and the proposed 150sqm. The proposed building sits forward of the existing house by approximately 3m but is still set behind the front building line of No.6 to the north and therefore would be appropriately sited within the plot. The building is also set in from the side boundaries of the plot, retaining a gap between the buildings of a similar size to the dwellings in the row to the south on Coulsdon Road. From the front elevation the building appears as a two storey detached building with a pitched roof and therefore is respectful of the appearance and massing of the adjacent properties. Whilst the depth of the building is noted, the side elevations would be masked by the buildings that flank either side and therefore this mass would not be harmfully obtrusive from within the public realm.
- 8.14 The rear elevation as seen from Petersfield Crescent, it is noted that the building does have a more imposing visual impact as a result of the significant change in levels across the site. The building would be located approximately 28m back from the boundary with Petersfield Crescent and would be set behind the proposed development that would front this road. As per the existing houses on Coulsdon Road that can be seen from Petersfield Crescent, the buildings are viewed as a backdrop to existing gardens with greenery and boundary treatment in front. Given the set back from the road and the existing view of dwellings, it is considered that the building would cause no undue harm to the existing character of the area.
- 8.15 The material palette is appropriate in this locality, maintaining a traditional appearance. The elevations would be finished in brick and render and the roof finished in plain clay tiles. These materials would sit comfortably with the surrounding area. Submission of specific material details will be secured by condition.

#### Houses to Petersfield Crescent

- 8.16 The proposed houses fronting Petersfield Crescent have been significantly altered in mass and appearance since the application was originally submitted.
- 8.17 There are three existing houses on the south east side of Petersfield Crescent. No's 14 and 15 face the road and are set back approximately 7-8m from the back edge of



the pavement. No.16 is a more recent infill property and is angled so that it does not sit front on to the street. As such there is no clearly established building line on this side of Petersfield Crescent. As per No.8, the proposed units would not directly face the highway either, and given that there is no strong front building line, this is considered to be appropriate in this specific setting. At its closest point, the proposed building would be located approximately 7m from the back edge of the pavement which is comparable with No's. 14 and 15 to the south. As such, the proposal would not have an overwhelming presence in the street scape in terms of its position.

8.18 The proposed building presents as a pair of semi-detached houses which is characteristic of Petersfield Crescent. As originally submitted, the application proposed significant excavation to form a pair of three-storey townhouses with additional accommodation in the roof space. Officers were of the opinion that the initial proposal was out of keeping with the appearance of adjacent properties on Petersfield Crescent and would have a harmful impact on the appearance of the street scene, by reason of the overall height of the building and roof form comprising half hips and narrow gable features that accentuated the verticality of the building.

8.19 The scheme was subsequently amended so that the lower storey was removed, the existing land levels better respected. The building now appears as two-storey with accommodation in the roof space. The frontage has been designed to comprise decorative gable features that are comparable with the dwellings to the north west side of Petersfield Crescent, with brickwork to the elevations and mock-Tudor timber and rendered elements to the gable features.



Figure 5. Street elevation on Petersfield Crescent



Figure 6. Existing houses on Petersfield Crescent

- 8.20 The main roof is pitched, however elements are present to either side to enable the roof space to be utilised as additional habitable accommodation. These elements are set back from the frontage by 1.2m and down from the ridge by 0.7m. On balance, it is considered that the appearance of the amended building would be appropriate in the street scene, respecting the existing character and layout of buildings on Petersfield Crescent.
- 8.21 The existing garden area would be developed to provide residential accommodation. There are no significant or protected trees in this garden, the garden mostly laid to lawn with ornamental shrubs and bushes to the boundaries. On the Petersfield Road frontage it is proposed to create one vehicular access for the two dwellings to retain/provide as much of a soft frontage as possible. New hedging and trees are proposed to the front forecourt as well as planters to the front of the houses. Coulsdon Road is lined with mature street trees which would not be affected by the development. The plans have been amended to ensure that the existing hedge to the front boundary on Coulsdon Road is retained. Full details of landscaping will be secured by condition including protection measures for the retained hedging and street trees.
- 8.22 The site has a suburban setting with a PTAL rating of 2 and as such the London Plan indicates that the density levels ranges of 150-250 habitable rooms per hectare (hr/ha) are appropriate. The proposal would be in excess of this range at 295 hr/ha. However, the London Plan further indicates that it is not appropriate to apply these ranges mechanistically, as the density ranges are broad, to enable account to be taken of other factors relevant to optimising potential – such as local context, design and transport capacity. The application site is a large plot within an established residential area and is comparable in size to other flatted and neighbouring back-land developments approved throughout the borough. As outlined above, the proposal as amended would overall result in a development that would respect the pattern and rhythm of neighbouring area and would not harm the appearance of the street scene.
- 8.23 Therefore on balance, having considered all of the above, against the backdrop of housing need, officers are of the opinion that the proposed development that would comply with the objectives of the above policies in terms of respecting local character.

### **Housing Quality for Future Occupiers**

- 8.24 All of the proposed new units would comply with internal dimensions required by the Nationally Described Space Standards (NDSS).
- 8.25 Whilst the proposed units in the flatted block face either east or west, they all have secondary windows in the south and/or north elevations which would allow extra light and ventilation into the units. No units are north facing only. The lower ground floor unit has been amended during the course of the application so that the east facing bedroom has been removed following concerns that this would receive inadequate light (as a result of the ground level changes). The unit in the roof space initially had only a side facing bedroom window that was shown to be obscurely glazed. The dormer window has been relocated to the front elevation to enable this room to have some outlook.

- 8.26 The proposed houses are dual aspect with windows facing east and west. These units would receive adequate light and would be well ventilated. Overall, the quality of proposed internal amenity space is considered acceptable.
- 8.27 With regard to external amenity space, the London Housing SPG states that a minimum of 5sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1sqm for each additional unit. The flats all have private amenity in the form of a courtyard or balconies. The houses have provide gardens of approximately 30sqm. All private amenity spaces meet or exceed the required standards.
- 8.28 An area of communal garden (approximately 60sqm) is provided within the site. Children's play space would be provided within this space and full details of this area will be secured by condition.
- 8.29 In terms of accessibility, the level changes across the site make it difficult to provide step free access for the majority of the development. Step free access is provided to the two ground floor units of the flatted block. The applicant has confirmed that the ground floor units will be designed to be wheelchair accessible/adaptable dwellings (to both building regulation Part M4(2) and Part M4(3)). This would be secured by condition insofar as it relates to the approach to the building, private amenity space and internal arrangements of the accommodation.
- 8.30 Given the constraints of the site the other units cannot be accessible for wheelchair users. Given the significant level change the communal garden is only accessible by steps. In order to ensure the development fronting Petersfield Crescent is acceptable in terms of impact on visual amenity, the dwellings are set up from the highway and therefore are not step free. It has been noted through neighbour representation that this area is not very accessible for wheelchair users given the topography and fall and quality of the pavement on Petersfield Crescent. In this instance, it is considered acceptable for the units to not provide step free access for future occupiers.
- 8.31 There would be a gap of 16.5m between the two proposed buildings. The SDG suggests that back to back distances for new to new dwelling should be a minimum of 12m to provide sufficient privacy to the new residents. The proposal accords with this guidance. The level change between the buildings is noted however given the orientation of the buildings it is considered that the new dwellings would receive adequate light.
- 8.32 Overall, given the constraints of the site, the development is considered to provide an acceptable standard of accommodation for future occupiers.

### **Residential Amenity for Neighbours**

- 8.33 The main properties that would be affected by the proposed development are 6 and 10 Coulsdon Road, 16 Petersfield Crescent and the properties on the north west side of Petersfield Crescent.

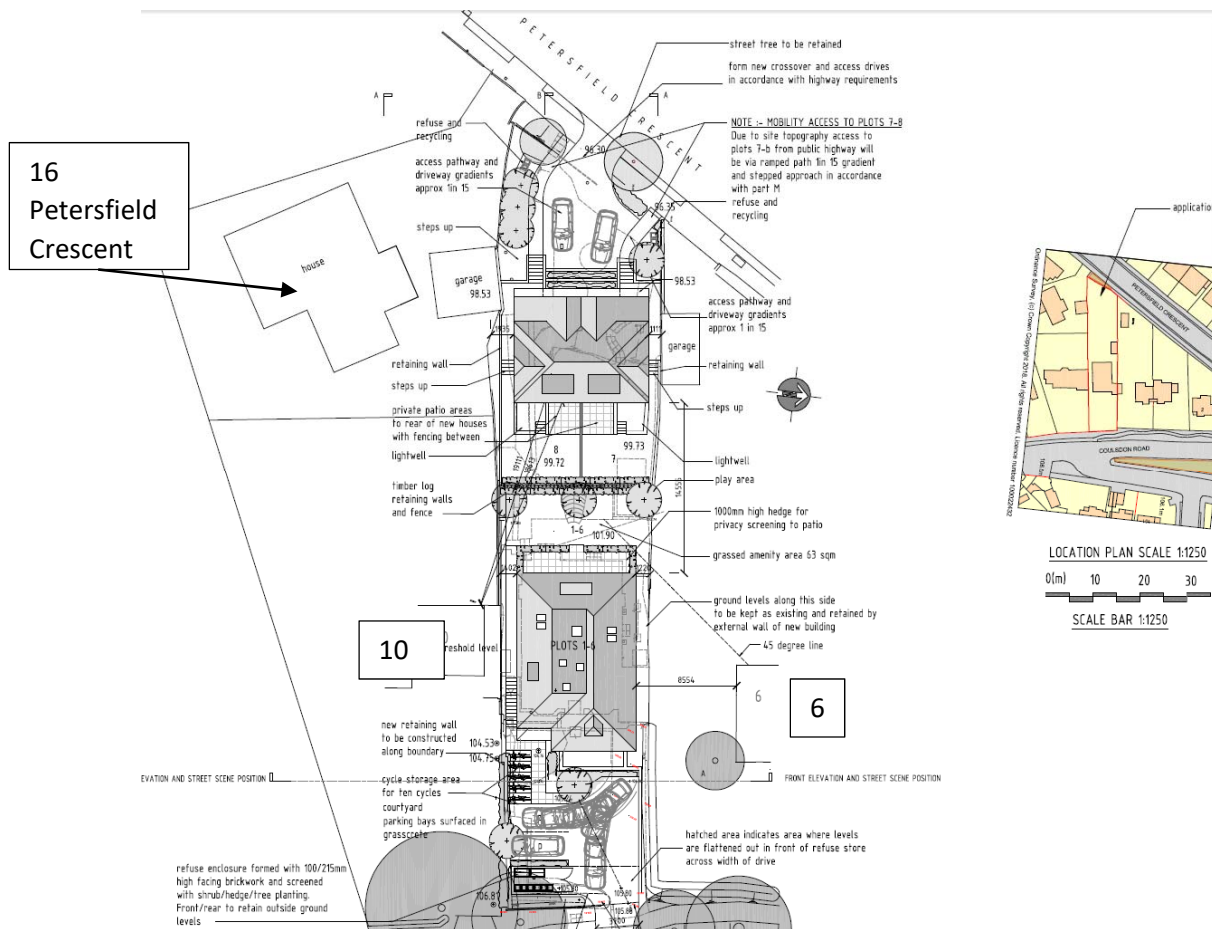


Fig 7: Proposed Block Plan highlighting the relationship with the adjoining occupiers.

### 6 Coulsdon Road

- 8.34 This semi-detached dwelling is located to the north of the site. It is single storey with accommodation in the roof space. Its side elevation is located approximately 7m from the boundary with No.8 and contains a kitchen window and door and obscurely glazed bathroom windows. There is a detached shed to the side of the dwelling.
- 8.35 The proposed development does not encroach over a 45 degree angle either in plan or vertically from the closest rear window of No.6. As such it is not considered that the development would be unduly overbearing on this property. It is noted that there are mature trees along the side boundary within the garden of No.6 which would screen the development from the house and rear patio of this dwelling. The development site is located to the south of No.6 and therefore the proposal may result in some loss of light to the side facing windows in No.6. Paragraph 2.9.3 of the SDG outlines that daylight and sunlight analysis study will not normally be required where a neighbour's window directly faces onto or over an application site in a manner that is considered to be un-neighbourly. These un-neighbourly windows place undue restraints on the development, and as such the light and outlook they receive will not receive significant protection. Two of the windows serve a bathroom and wc (non-habitable rooms) and the other openings the kitchen which are situated 7m from the boundary with a shed and vegetation in front. Given the location of these openings, in this instance any loss

of light to the kitchen on No.6 is not considered to be so significant that permission should be refused for this reason.

- 8.36 The windows in the northern side of the proposed building are either secondary or serve bathrooms. As such all windows can be glazed with obscure glass and can be non-opening below 1.7m above floor level, and therefore the proposal will not cause any loss of privacy to No.6.
- 8.37 The proposed houses to the west of the site are located approximately 23m from the rear elevation of No.6 and are situated on a lower level. Given this separation distance and level change, these houses would not cause any harmful loss of light, outlook or privacy to No.6.
- 8.38 Overall, on balance, the impact on No.6 is considered to be acceptable.

#### 10 Coulsdon Road

- 8.39 This detached two-storey dwelling is situated to the south of the application site. It extends across the width of the plot and has an integral double garage to the north side of the ground floor with non-main habitable space to the rear of the garage. There are no side facing windows. The flatted block does not encroach over a 45 degree angle from the rear or front habitable windows of No.10 and therefore would not have an overbearing impact on this property. No.10 is located to the south side of the application site and therefore the proposals would not cause any harmful loss of light.
- 8.40 The windows in the southern side of the proposed building are either secondary or serve hallways. As such all windows can be glazed with obscure glass and can be non-opening below 1.7m above floor level, and therefore the proposal will not cause any loss of privacy to No.10.
- 8.41 The proposed houses to the west of the site are located approximately 18m from the rear elevation of No.10 and are situated on a lower level. Given this separation distance and level change, these houses would not cause any harmful loss of light, outlook or privacy to No.10.
- 8.42 Overall, the impact on No.10 is considered to be acceptable.

#### 16 Petersfield Crescent

- 8.43 This detached two-storey dwelling is located to the south of the site and is situated at an angle to the highway facing onto the western part of the application site. It has a detached garage to the northern boundary and its garden wraps around the north, east and southern side of the building.
- 8.44 The proposed houses facing Petersfield Crescent are located to the northern side of the garden and garage of No.16. The houses would be approximately 9.5m from the closest point of the dwellinghouse at No.16 and would not be positioned in view of any main habitable room windows. As such, given the layout and relationship between buildings, the proposal would not be significantly overbearing or cause any harmful loss of outlook.

- 8.45 The proposed building would be located to the north side of No.16 and would cause no harmful loss of daylight or sunlight to any habitable rooms of the adjacent dwelling. Whilst it is noted that the northern part of the garden of No.16 accommodates a hot tub (adjacent to the northern boundary), given the orientation of the sites the proposal would cause no loss of sunlight to this part of the garden.
- 8.46 The windows in the southern side of the proposed building serve the staircase and as such can be glazed with obscure glass and can be non-opening below 1.7m above floor level. Therefore the proposal will not cause any loss of privacy to No.16.
- 8.47 The proposed flatted block fronting Coulsdon Road would be located approximately 21m from the closest part of the dwelling at No.16 and at an oblique angle to any main habitable room windows. Given the orientation of the buildings and gap between them, the flatted block would not have any significantly harmful impact on the amenities of No.16 by way of cause any harmful loss of light, outlook or privacy.
- 8.48 Overall, the impact on No.16 is considered to be acceptable.

#### *Dwellings on the opposite side of Petersfield Crescent*

- 8.49 Dwellings on the opposite side of Petersfield Crescent are located to the north west of the site. Their front boundaries are located approximately 10m from the boundary of the application site and approximately 18m from the closest point of the proposed building. Given this gap, and separation by the road, the proposal would not cause any harmful loss of light, outlook or privacy to these dwellings.
- 8.50 Overall, the impact on the neighbouring residential property is not so significant that permission should be refused for this reason and conditions would be imposed to prevent the proposals from causing any loss of privacy.

#### **Parking and Access**

##### Parking

- 8.51 The site has a PTAL rating of 2 which means that it has relatively poor access to public transport links. The London Plan sets out maximum car parking standards for residential developments based on public transport accessibility levels and local character. 1-2 bedroom units should provide less than 1 space per unit and 3 bedroom units up to 1.5 spaces per unit. Therefore the maximum requirement for this development would be 9 spaces. 2011 Census data estimates that car parking demand from the proposed development will generate a demand of 7 spaces.
- 8.52 It is proposed to create a total of 4 vehicular parking spaces off road, two for the development fronting Coulsdon Road (6 x 1 and 2 bedroom units) and two for the two houses (3 bedroom) fronting Petersfield Crescent. The development is therefore potentially likely to result in a parking overspill of 3-5 vehicles onto the surrounding roads.
- 8.53 The applicant has undertaken an on-street parking survey to recognised Lambeth methodology. This survey shows that roads surveyed in the immediate area have a parking stress of between 15-20% (317 available spaces). It is important to note that Coulsdon Road to the south of Petersfield Crescent has been discounted from the survey due to safety concerns of parking in this area.

- 8.54 It is considered that residents of the proposed development are likely to park on the roads closest to the site, which are Petersfield Crescent, Hartley Down and Hartley Way. The parking stress survey shows that Petersfield Crescent has 29% parking stress (36 available spaces), Hartley Down has an average of 19% parking stress (60 available spaces) and Hartley Way has an average of 14% parking stress (52 available spaces). Given the low parking stress in the area, it is not considered that the additional of 3-5 extra vehicles parking on street would have a significantly harmful impact on highway safety in this instance.
- 8.55 It is noted that there is a current planning application/planning permission has recently been granted at 2 Coulsdon Road (reference 19/03003/FUL) which proposes 6 off-road parking bays for 9 units. Given the low parking stress recorded in the area, it is considered that there is ample space on street to accommodate any overspill parking demand from both of the proposed developments.
- 8.56 Local Plan Policy DM30 states that 20% of parking bays should have EVCP with future provision available for the other bays. Details and provision of the EVCP will be conditioned.
- 8.57 Cycle storage areas would be provided within the site for the proposed development. Each house would have space for two cycles inside the buildings. The proposed flats would generate a demand for 9 cycle bays (as required by the London Plan). A storage area for 10 cycles would be provided to the front of the building. Full details of this storage area will be secured by condition.

#### Access

- 8.58 TRICS data has been used to assess trip generation from the proposed development and finds that the development would generate an additional two vehicle movements in each peak hour which is unlikely to be perceptible and the effects on the highway network are therefore concluded to be negligible.
- 8.59 The Transport Statement provides manoeuvring plans that demonstrate that vehicles can manoeuvre into the proposed parking spaces. On Coulsdon Road vehicles can access and egress in forward gear. Vehicles would need to manoeuvre on Petersfield Road to access the new dwellings. It is acknowledged that the access is opposite Hartley Down. This is the existing situation for the majority of existing properties on this road and the amount of vehicular movements associated with this access would be low, therefore it is considered appropriate in this instance. The submitted plans show that the required pedestrian and vehicle sightlines can be achieved from both vehicular accesses to the site.

#### Refuse storage/collection

- 8.60 Individual refuse storage areas are proposed for the two houses fronting Petersfield Crescent. The plans show that the scale of the refuse areas is adequate for the needs of the development.
- 8.61 A refuse storage area is shown to the front of the flats fronting Coulsdon Road. Given the fall in level across the site, the plans have been amended to show the refuse store located behind the front boundary hedge whereby the bins will be at a similar level to the existing vehicular access.

#### **Environment and sustainability**

- 8.62 Conditions will be attached to ensure that a 19% reduction in CO2 emissions over 2013 Building Regulations is achieved and mains water consumption would meet a target of 110 litres or less per head per day.
- 8.63 The site is located within an area low risk of surface water and groundwater flooding. A Flood Risk Assessment (FRA) 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 report outlines SuDS measures that could be feasible at the site including rainwater harvesting, green roofs, permeable paving, swales and soakaways. Onsite investigation is required and therefore a condition requiring site specific SuDS measures would be imposed on any planning permission.
- 8.64 Thames Water has commented that from the information provided they are unable to determine the waste water infrastructure needs of this application. They have required that should planning permission be granted, a condition be applied requiring a drainage strategy detailing any on and/or off site drainage works to be submitted to ensure that the proposal does not lead to sewerage flooding.

### **Other matters**

- 8.65 Trees and landscape - There are no significant or protected trees in the garden of No.8. The garden is mostly laid to lawn with ornamental shrubs and bushes to the boundaries. 10 Coulsdon Road has large trees to its southern boundary and these are at a distance from the proposed development and would therefore not be affected. On the Petersfield Road frontage it is proposed to create one vehicular access and retain/provide as much of a soft frontage as possible. The existing street tree would be retained. New hedging and trees are proposed to the front forecourt as well as planters to the front of the houses. Coulsdon Road is lined with mature street trees which would not be affected by the development. The plans have been amended to ensure that the existing hedge to the front boundary on Coulsdon Road is retained. Full details of landscaping will be secured by condition including protection measures for the retained hedging and street trees.
- 8.66 Ecology – Respondents have commented that the proposal would lead to a loss of wildlife habitat. The application site is not near an area of special scientific interest or a site of nature conservation value. There are concerns raised by public about biodiversity. The site is a residential property in an adequate state of repair. As such, it is not considered likely to support protected species' habitats. Whilst there would be an overall loss of landscaped space, it is not considered to be high in biodiversity value. An informative would be included on any decision making the applicant aware that it is an offence to harm protected species or their habitat and in the event that protected species are found on site the applicant should refer to Natural England standing advice.
- 8.67 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.

### **Conclusion and planning balance**

- 8.68 The principle of residential development is considered acceptable in this area. The development accords with policy requirements and the Suburban Design Guide in terms of its massing and overall impact on the visual amenities of the area. The



proposal has been designed to ensure there would be no unacceptably harmful impact on the amenities of the adjacent properties and provides adequate amenity for future residents. The impact on the highway network is acceptable. The proposal's design and appearance is satisfactory and does not weigh against it in the balance. The proposal would lead to a reduction in garden area, but not of high biodiversity value and reversing on to Petersfield Crescent, but not so frequently as to raise concerns about highway safety. The proposal would provide acceptable quality of accommodation and a good number and mix of units. Therefore, with the conditions recommended the proposal is considered to be in accordance with the relevant policies.

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