

1.0 SUMMARY OF APPLICATION DETAILS

Ref: 19/04500/FUL
 Location: 1 Smitham Downs Road, Purley, CR8 4NH
 Ward: Coulsdon Town
 Description: Demolition of existing three storey house and detached garage and erection of a five storey building (including basement and accommodation within the roof space) to provide 9 units as well as associated new vehicular access, car parking, cycle/refuse storage and soft/hard landscaping.
 Drawing Nos: 615/017/PL1, 615/017/PL2 Rev F, 615/017/PL3 Rev A, 615/017/PL4 Rev C, 615/017/PL5 Rev C, 615/017/PL7 Rev D, 615/017/PL8 Rev C, 615/017/PL9 Rev B, 615/017/PL10 Rev D, 615/017/PL11 Rev C, 18211E, Existing Floorplans.
 Applicant: Lumiere Property
 Agent: Neal Thompson
 Case Officer: Tim Edwards

	1b, 2p	2b, 3p	2b, 4p	3b, 4p	5b, 8p
Existing					1
Proposed flats	4	2	2	1	

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 objections above the threshold in the Committee Consideration Criteria have been received.

2.0 RECOMMENDATION

- 2.1 That the Planning Committee resolve to GRANT planning permission subject to the prior completion of a legal agreement to secure the following planning obligations:
- 1 Sustainable Transport contribution of £13,500 towards parking restrictions and feasibility study into an additional bus route.
 - 2 Any other planning obligation(s) considered necessary by the Director of Planning and Strategic Transport
- 2.2 That the Director of Planning and Strategic Transport has delegated authority to negotiate the legal agreement indicated above.
- 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. Details of materials to be submitted
6. Details of proposed balcony/balustrading/privacy screening to be submitted
7. Details of communal stairs/routes, to ensure ambulant disabled accessible, including stair design, handrails, lighting and step depth to be submitted.
8. Hard and soft landscaping including boundary treatment, retaining walls and maintenance to be submitted
9. Details of children's playspace to be submitted
10. Details cycle and refuse storage to be submitted
11. Car parking, highway works and electric vehicle charging point to provided prior to occupation
12. Obscured glazing and non-opening fenestration within the northern elevation.
13. 19% Carbon reduction
14. 110litre Water usage
15. 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) Highway works
 - 4) 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.
- 2.5 That if after three months, from when a decision it taken to grant consent, and the legal agreement has not been completed, the Director of Planning and Strategic Transport has delegated authority to refuse planning permission.

3.0 PROPOSAL AND LOCATION DETAILS

- 3.1 The proposal includes the following:
- Demolition of existing house
 - Erection of a three storey building with accommodation in roof to create 9 residential units with provision of communal external amenity space and children's play space
 - 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 notably alter the external appearance of the building, removing the flat roof and introducing hipped/gable roof. Alterations to the proposed balcony positioning and detailing as well

as enlargement of the vehicular access and additional pedestrian access from The Drive.



Figure 1: Existing site plan

Site and Surroundings

- 3.3 The site comprises a two storey building with accommodation in the roof space. The site is located on the corner of Smitham Downs Road and The Drive, as well as being in close proximity to Brighton Road. The site steps up significantly from east to west towards the properties at 1 The Drive.
- 3.4 This is a predominantly residential area with an array of dwelling types present. 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 3 indicating a moderate access to public transport.



Figure 1: Aerial street view highlighting the proposed site within the surrounding streetscene

Planning History

- 3.5 08/00928/P - Formation of vehicular access (permission granted but not implemented).
- 3.6 11/02497/P - Formation of vehicular access (renewal of planning permission 08/00928/P) (permission granted but not implemented).
- 3.7 Application at 6A The Drive, ref. 18/05858/FUL - Demolition of existing 4 bedroom detached dwelling house and the erection of a part three/part four storey building with accommodation in the roof space and a basement area to provide 9 flats (comprising 2 x one bedroom, 5 x two bedroom and 2 x three bedroom), 6 parking spaces, private amenity space and landscaping including retaining walls. (permission granted by planning committee on 28th February 2020)

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 of varying sizes
- 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.

6.0 LOCAL REPRESENTATION

- 6.1 The application has been publicised by 23 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: 40 Supporting: Comment: 0

- 6.2 The neighbours were notified again with regard to the amended plans and 1 objection (included in the total above) was 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>	
Loss of a family home.	Whilst the existing dwelling would be demolished, the proposal would provide three family units line with Policy SP2.7 and is therefore acceptable. This is addressed further in Section 8.5 – 8.6 of this report.
Overdevelopment of the site/high density	Addressed in Section 8.13 of this report.
Out of keeping with existing development in the area in terms of height and bulk. Being five storeys it is out of keeping.	This point is addressed in sections 8.7 – 8.13 of this report.
Cannot argue that the site can accommodate nine units but the design is out of keeping.	It is noted that a number of these comments, including this one, relating to the proposed development design were received prior to the alterations to the scheme which altered the proposal from an ‘innovative flatted roof development’ to more of a contemporary reinterpretation with pitched roof. This points is also further addressed in sections 8.7 – 8.13 of this report.

Blocks of flats are out of keeping in the area.	Planning policies and the Suburban Design Guide advocate windfill developments, such as this one, 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 8.21 – 8.30 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.
<i>Trees/Ecology/Environment</i>	
The proposed development is in the green belt.	The site is not designated as Green Belt.
<i>Transport and parking</i>	
Inadequate parking provision will exacerbate parking problems.	Addressed in sections 8.31 – 8.40 of this report.
Commuters using local bus stops and Reedham Station park opposite the site making it difficult going in and out of the driveway.	As stated, parking is noted to be unrestricted in Smitham Downs Road and this proposed development would not alter this. Whilst an additional vehicular access is proposed from the development site, there are acceptable sightlines/visibility splays which are considered acceptable. This is further addressed in sections 8.31 – 8.40 of this report.
Increased traffic around over congested and dangerous junctions.	Addressed in sections 8.31 – 8.40 of this report.
<i>Amenities of future occupiers</i>	
No affordable housing provision	This is a minor development and there is no policy requirement for affordable housing.

Other matters	
Increased floor risk including basement accommodation in heavy rainfall area.	Addressed in section 8.42 of this report
The existing street trees would need to be removed for the development.	Addressed in section 8.43 of this report
Impact upon local services including GP's, schools etc.	The proposed development would be Community Infrastructure Levy (CIL) liable. Providing funding for borough wide improvements in relation to local services.
Loss of flora and fauna which further contribute to pollution.	Addressed in section 8.44 of this report
The council need to consider that many residents have been refused house alterations for much less.	Every planning application is considered on its own merits, based upon the relevant planning policies and guidance at the time. This proposal as addressed throughout the report is considered to be in accordance with the relevant planning considerations for the site.
Impact upon the right to light.	Whilst the potential impact upon the loss of daylight/sunlight is a material planning consideration, and addressed in sections 8.21 – 8.30 of this report, the right to light is not.
Devalue existing house prices	This is not a material planning consideration.

6.4 The Purley and Woodcote Resident's Association have objected to the proposal on the following grounds:

- Overdevelopment of the site in terms of size and scale.
- The overdevelopment of the site also results in the proposed building being completely out of keeping with the locality and surrounding townscape, as a result of its massing, form, and overall appearance.
- Insufficient amenity space for a development of the size proposed due to the intensive / over development of the site.
- The intensity of development results in minimal and insufficient amenity space available for the likely number of occupiers of the development
- Detrimental to the amenity of occupiers of adjoining properties. Given the size and scale of the proposed development the occupiers of neighbouring properties will suffer visual intrusion, increased noise and, for those adjacent to the proposed development, loss of privacy.

- Inadequate car parking for a development of the size and scale proposed, resulting in additional on street parking, putting parking pressure on the surrounding area, and increasing traffic movements, so endangering road safety at this very busy junction.
- Loss of a family home, whilst the proposed development would not contribute to providing family accommodation across the Borough.

6.5 Amended plans were received for the proposal, responding to planning officer and objectors concerns in regards to the proposed design of the development, as well as some minor alterations to the scheme which were consulted upon accordingly. Subsequently, final amended plans were submitted clarifying site levels around the proposed refuse store and defensible space around lower ground/ground floor spaces which were not consulted upon, considering their non-material nature to the proposal.

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 flood risk
- SP7 – Green Grid
- DM27 – Biodiversity
- DM28 – Trees
- SP8 – Transport and communications
- DM29 - Promoting sustainable travel and reducing congestion
- DM30 - Car and cycle parking in new development

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 and 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, that whilst the Secretary of State has not supported 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 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.

- 8.4 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.
- 8.5 CLP Policy DM1.2 seeks to prevent the net loss of 3-bedroom homes (as originally built) and homes less than 130m². The existing building on site is a 5 bedroom house with a floor area of approximately 220sqm. Whilst the development would not result in the loss of a home smaller than 130 sq m nor 3 bedrooms when originally built there would be no net loss of family units.
- 8.6 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 1 x 3 bedroom units and 2 x 2 bedroom 4 person unit. Overall, the proposal provides 30% family homes on site and contributes towards the Council's strategic target.

Townscape and Visual Impact

- 8.7 The existing building does not hold any special significant architectural merit and is neither locally nor statutorily listed. Therefore there is no objection to its demolition.
- 8.8 The proposed development would sit within a prominent location on the corner of The Drive and Smitham Downs Road, as well as being in close proximity to the road junction with Brighton Road. In line with the principles set out by the Suburban Design Guide (SDG) the location provides the opportunity to create a marker point within the townscape by accommodating additional height and depth within the development. The proposal aims to respond accordingly by proposing additional height (being five storeys), with a basement and accommodation located within the roof space. Owing to the land levels on site, the proposed development would read as a three storey building with roof accommodation from Smitham Downs Road and as a two/three storey building with accommodation in the roof space as seen from different views within The Drive. Whilst being taller and utilising the corner plot the development has focussed the mass away from the existing properties (both within Smitham Downs Road and The Drive) by setting the building within the altering land levels to provide additional storeys without detrimentally impacting upon the character of the area and creating a positive marker building as seen from a variety of views in much the same way as the existing building (and as shown in figures 3).



Figure 3: Existing Site Photo (left) and Proposed (right) building CGI

- 8.9 The building sits approximately 1.8 metres further forwards than the existing building on-site. However, owing to the plots shape and its location as Smitham Downs Road Curves, as seen from both Brighton Road and Smitham Downs Road itself, overall the proposal is considered to be acceptable as it responds to the individual nature of the site.
- 8.10 The proposed area is varied in character with a number of in-fill developments (as highlighted within the planning history) and building type which varies between one and two storey dwelling with accommodation in the roof, such as the existing house on-site. The buildings themselves, both within The Drive and Smitham Downs Road, are made up of brick, render, mock-tudor and hung tiles red/brown tiled roofs. The proposed building would respect the mixed palette materials seen throughout with the primary material being brick. Whilst the proposed development would include increased levels of glazing and terraces/balconies these are considered to add further interest within the built form whilst positively addressing the prominent corner location that it is based within.
- 8.11 The proposed roof form includes both hipped and gable elements, within a location which varies in style between the two and is therefore considered to respond appropriately to the existing character of the area. Overall it is considered that the proposed development mass, height and scale responds to the evolving context of the area, whilst making the most efficient use of the land and in line with guidance set out by the CLP 2018 and the SDG.
- 8.12 The proposal includes the introduction of a new vehicular access from Smitham Downs Road to a forecourt parking area for four cars. Forecourt parking is prominent within the surrounding sites. However, the proposed development has incorporated good opportunities for soft landscaping to be introduced to break down the proposed hard landscaped parking and pedestrian routes around the building as well as provide defensible space around all private amenity/habitable rooms at ground floor level. Overall this approach is supported in principle subject to a detailed landscaping plan which is proposed to be secured via condition.
- 8.13 The site has a urban setting with a PTAL rating of 3 and as such the London Plan indicates that the density levels ranges of 150-450 habitable rooms per hectare (hr/ha) are appropriate. The proposal would be comfortably within this range at 190 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. In this case the proposal has considered the local context which is varied as set out, transport availability and utilising the sites location on a corner to increase the height over the building whilst respecting the amenities of the adjoining occupiers, as discussed further below.

- 8.14 Therefore, 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

- 8.15 All of the proposed new units would comply with internal dimensions required by the Nationally Described Space Standards (NDSS).
- 8.16 All units are dual aspect in form allowing for acceptable levels of outlook from all habitable spaces. The applicant has also submitted a daylight and sunlight assessment to demonstrate that the proposed units, notably at lower ground and ground floor would be provided with acceptable daylight and sunlight in accordance with the BRE guidance. Minor amendments including the introduction of defensible space around the two high level secondary windows located within the eastern elevation facing onto the car parking area. At ground floor level the windowsill heights have been raised to remove the potential for overlooking directly into flat 4 as well as additional defensible space within flat 2. Overall, the proposed units are considered to provide acceptable living conditions for all future occupiers.
- 8.17 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. All private amenity spaces meet or exceed the required standards.
- 8.18 An area of communal garden (approximately 41sqm) 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.
- 8.19 In terms of accessibility, the level change of over 5 metres from the front to the rear of the make it difficult to provide step free access for the majority of the development. The significant land levels changes from the front of the site to the internal accommodation and then again to the rear communal areas are a significant challenge which have been considered carefully. Overall, taking into account the specific nature of the site, the proposal is considered acceptable. Internally and externally, the details relating to the communal stairs/routes through the communal areas are designed to ensure ambulant disabled accessible stair design, including handrails, lighting and step depth are proposed to be secured via condition.
- 8.20 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

- 8.21 The main properties that would be affected by the proposed development are 1a and 220 Smitham Downs Road, 1a and 2a The Drive and 2 Brighton Road.

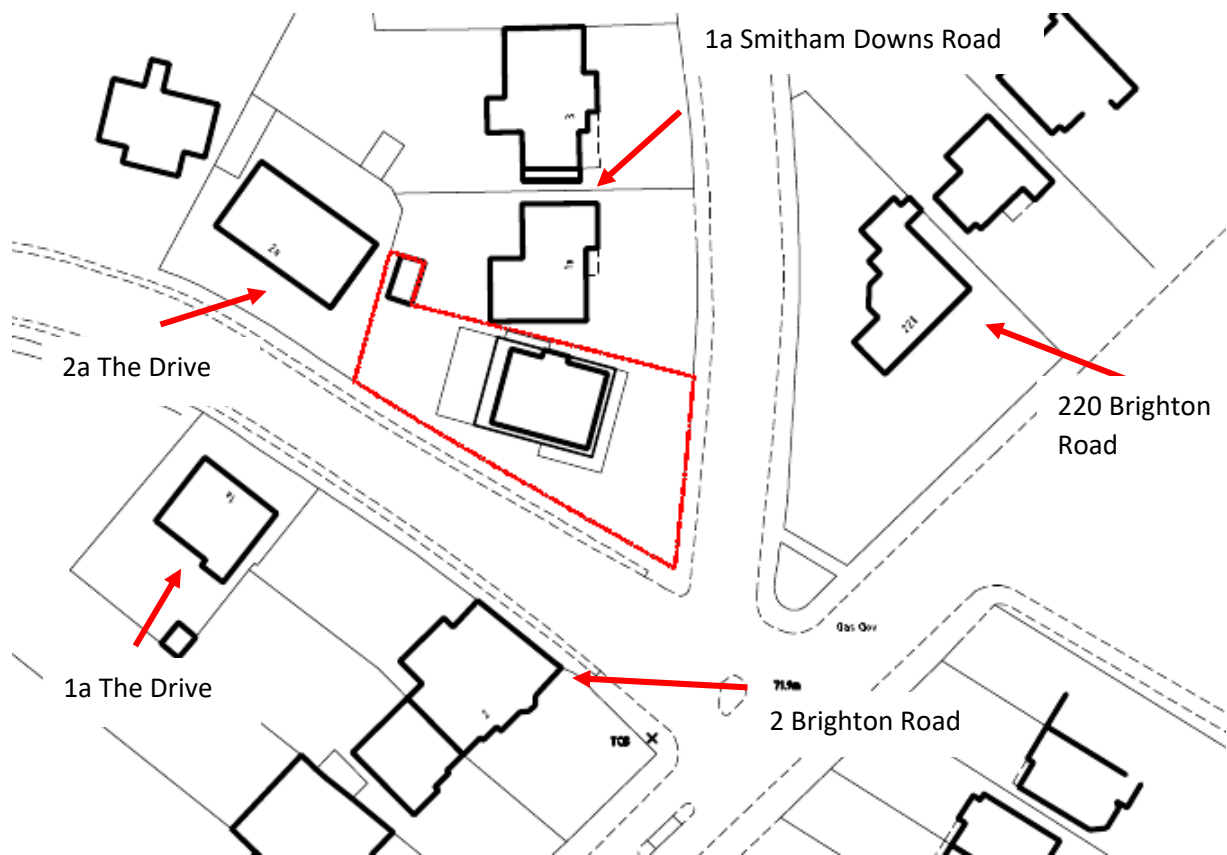


Figure 4: Proposed Block Plan highlighting the relationship with the adjoining occupiers.

2a The Drive

- 8.22 The proposed rear elevation of the development would be separated from the flank facing elevation of 2a The Drive (and the windows located within this elevation) at its closest point by 13.8 metres. However, this is the separation between the flank elevation and the ground floor which would be set at a lower level than this adjoining occupier. The building would then step to 18 metres separation from first floor level and above. The proposed development would also be at an angle to this adjoining occupier with the retention of the proposed existing boundary hedging further restricting overlooking and ensure that the proposal would not have an overbearing impact upon this adjoining occupier.
- 8.23 There are two windows/glazed doors located within the eastern elevation of this neighbour facing towards the development site. These windows are located within dual aspect rooms (a bedroom and living space) and whilst there is noted to be some of this properties amenity space located between their flank elevation and 1 Smitham Downs Road, the majority of private amenity is located to the rear of the site with the area to the east being highly visible from the roadside anyway. Considering the stepped rear elevation, the separation distances, the secondary nature of the windows located within the adjoining occupiers flank elevation and their amenity spaces as well as the retention of the existing boundary hedging within the site, then overall the proposal is considered to protect the amenities of these adjoining occupiers to an acceptable degree.



Figure 5: Streetscene elevation showing the proposed dwelling with 2a The Drive

1a Smitham Downs Road

- 8.24 This detached two-storey dwelling is situated to the north of the application site. As with the relationship with 1a The Drive, the proposed ground floor extension of the proposed development would encroach within the 45 degree angle (at ground floor level). However, this encroachment is approximately 0.90 metre and would be partially screened by the boundary fencing between the sites, as this rises up from the east to west. Overall this is not considered to be unacceptable. All other balconies/terraces are set away from the boundary facing towards the roadside with a condition proposed to detail privacy screening on the side facing towards this adjoining occupier. Overall there is not considered to be an overbearing/loss of privacy caused by the development on 1a Smitham Downs Road.
- 8.25 Whilst the proposed development would be higher than the existing, the development as shown in figure 6 details that the proposal does not encroach over a 45 degree angle from the rear facing first floor windows in either elevation or floorplan. There are noted to be three side facing windows located within this adjoining occupiers flank elevation facing towards the site, however it is noted that these are secondary windows located within a triple aspect room. It is also important to note point 2.9 of the SDG which states that where “*un-neighbourly windows place undue restraints on the development, and as such the light and outlook they receive will not receive significant protection*”. Therefore, considering the proposed buildings massing and footprint as well as the secondary nature of any side facing windows and the relevant guidance, overall the proposed impact upon 1a Smitham Downs Road is considered acceptable.

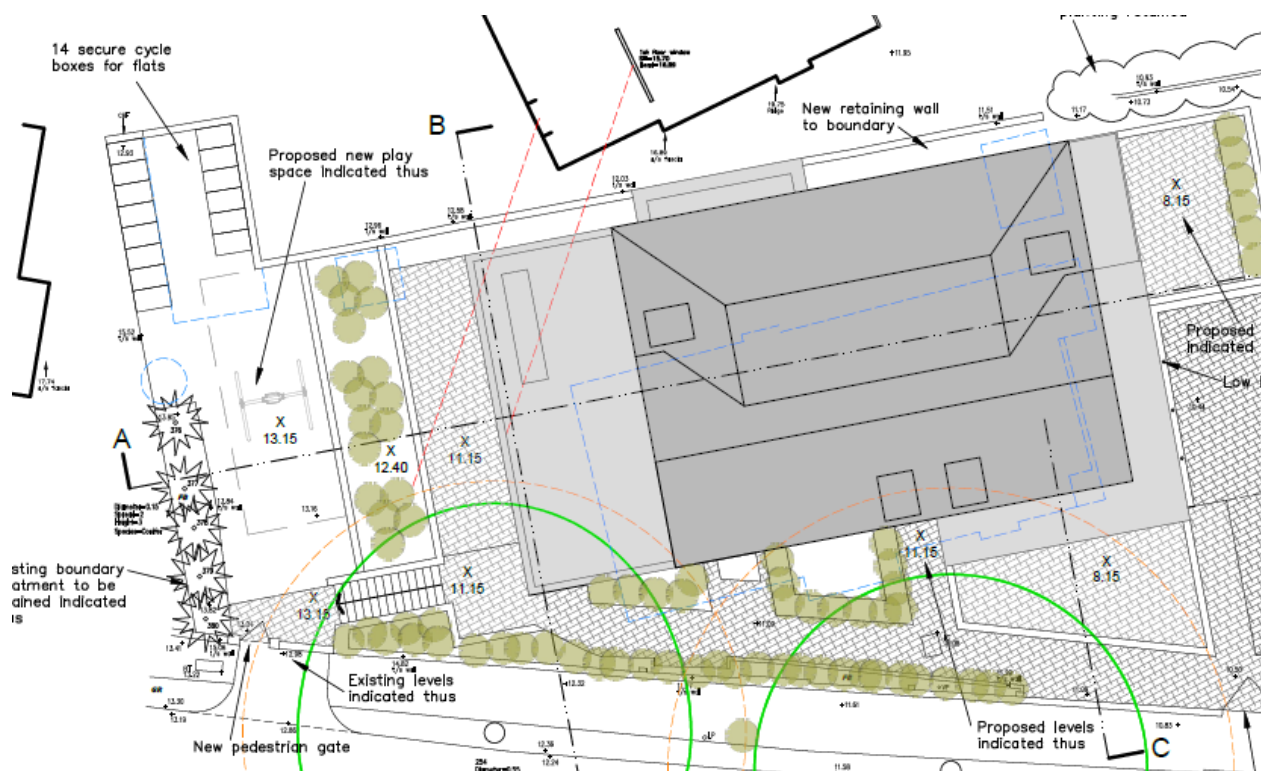


Figure 6: Block Plan with adjoining occupiers at 1a Smitham Downs Road

8.26 All side facing windows located within the northern elevation are either located within the communal stairwell or are secondary windows located within the flats. These are all proposed to be obscured glazed and non-opening up to 1.7 metres from the internal floor height to restrict overlooking.

1A The Drive

8.27 South-west of the site, on the opposite side of The Drive is no.1a, a two storey detached house. Taking into account the proposed 25 metre separation across a road overall there is considered not to be a detrimental impact on this adjoining occupier.

2 Brighton Road

8.28 South of the site is 2 Brighton Road which is approximately separated by 19.70 metres. Therefore, considering the separation distance alongside the existing mature street trees which are located within The Drive, there is not considered to be a detrimental impact upon the amenity of this residents.

220 Brighton Road

8.29 There is an approximate 26 metre separation across Smitham Downs Road to the stepped rear elevation of this adjoining site. Overall, taking into account this separation there is not considered to be a detrimental impact caused by the proposal.

8.30 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

- 8.31 The site has a PTAL rating of 3 which means that it has moderate 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 9.5 spaces. The applicant has also reviewed 2011 Census data estimates that car parking demand from the proposed development will generate a demand of 6 spaces.
- 8.32 The proposal provides 4 vehicular parking spaces off road. Therefore, the development based upon maximum parking standards would create up to a maximum of 5.5 parking spaces onto the local road network. The applicant has argued that based upon census data there would only be a demand of 2 spaces within the surrounding area.
- 8.33 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 23% (137 available spaces) and even if the additional 4.5 spaces were required by the development (and as set out by maximum standards) there would still be 131.5 spaces available.
- 8.34 It is noted that planning permission has recently been granted at 10 Smitham Downs Road (19/02313/FUL) and 6 The Drive which propose 10 off-street parking bays for the 18 units combined. 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 all three proposed developments.
- 8.35 A number of objections have raised concerns around how the development may impact upon highway safety. Whilst the building itself would be larger, this would not impact upon sightlines from the surrounding highways/junctions. The application was also submitted with an independent Road Safety Audit, due to its location in close proximity to two road junctions. The audit identified two potential concerns, which were an existing post in the middle of the proposed access as well as the new crossover itself. To mitigate for these two concerns the audit recommended that the post be moved and that the new crossover had adequate visibility splays which the applicant has proposed and is overall considered acceptable. This works will require highway consent and as such an informative is proposed on the application.
- 8.36 In order to encourage sustainable transport methods and discourage car ownership, it is recommended that the following measures are secured through the S.106 Agreement process:
- A financial contribution of £13,500 towards (1) the placement of car clubs with Electric Vehicle Charging Points within low to moderate PTAL area, and (2) contribute towards feasibility study to further develop proposals with TfL to introduce a tramlink extension along Brighton Road to Purley.
- 8.37 Local Plan Policy DM30 states that 20% of parking bays should have EVCP with future provision available for the other bays. In line with the relevant policies, 2 parking

spaces are proposed to be active with the other 2 proposed to be passive. This is overall considered to be acceptable.

- 8.38 Cycle storage areas would be provided within the site for the proposed development. The proposed flats would generate a demand for 14 cycle bays (as required by the London Plan). A storage area would be provided at the rear of the site. Full details of this storage area will be secured by condition.

Access

- 8.39 The Transport Statement provides manoeuvring plans that demonstrate that vehicles can manoeuvre into the proposed parking spaces. Whilst this would create an additional vehicular access to and from Smitham Downs Road, overall this is considered acceptable considering the small number of vehicles trips that would be created by four parking spaces on-site. Adequate sightlines have been provided alongside pedestrian visibility splays which are proposed to be conditioned.

Refuse storage/collection

- 8.40 A refuse storage area is shown to the front of the flats which is overall considered to be an appropriate location for waste personnel, following the introduction of a secondary pedestrian gate on The Drive and minor alteration to raise the land level around it. Details relating to this are proposed to be secured via condition and ensured it is appropriately screened from detrimentally impacting the character of the area through the detailed landscaping condition.

Environment and sustainability

- 8.41 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.
- 8.42 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. As the site also includes a basement the FRA documents that *"the maximum recorded groundwater is at 68mAOD, 5m below the lowest ground level of the site. The proposed basement accommodation has a floor level of 71.15mAOD, over 3m above the maximum recorded groundwater level"*. Overall the assessment has considered the potential flood risk on-site, however as no on-site investigations have taken place or SuDS measures outlined, a condition requiring site specific SuDS measures is recommended.

Other matters

- 8.43 Trees and landscape - There are no significant or protected trees in the garden of the dwelling and whilst the site is in close proximity to the two existing street yew trees, overall there is considered to be appropriate tree protection measures to protect these trees during construction which are proposed to be secured via condition.
- 8.44 Ecology – Objectors 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. 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.

- 8.45 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 borough.

Conclusion and planning balance

- 8.46 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 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.
- 8.47 All other relevant policies and considerations, including equalities, have been taken into account.