

**PART 6: Planning Applications for Decision**

**Item 6.1**

**1.0 SUMMARY OF APPLICATION DETAILS**

Ref: 20/00665/FUL  
 Location: 71-73 Pampisford Road, Purley, CR8 2NJ  
 Ward: Purley  
 Description: Demolition of existing dwellings (two); erection of a four storey residential development with top floor inset comprising 23 flats; provision of new access and 12 parking spaces, refuse and recycling stores, secure cycle parking and communal landscaped amenity space

	1B2P	2B3P	2B4P	3B5P +	Total Number of units
<b>Existing</b>				2	2
<b>Proposed houses</b>	5	5	9	4	23
<b>Private</b>	4	5	7	0	16
<b>Affordable Rent</b>	1	0	2	4	7

Drawing Nos: P700 A, P701A, P702A, P703A, P704A ,P705A, P800A, P801A, P802A, P803A, P806A, P900A, P1001A, P1002A, P1003A, P1004A, 0248/20/A/2A  
 Applicant: Budge Homes and Optivo  
 Agent: Grainger Planning Associates Ltd  
 Case Officer: Scott Schimanski

Number of car parking spaces	Number of cycle parking spaces
12 on site	41

1.1 This application is being reported to Planning Committee at the discretion of the Director of Planning and Strategic Transportation.

**2.0 RECOMMENDATION**

2.1 That the Planning Committee resolve to REFUSE planning permission for the following reasons:

**Reason for Refusal**

1. The proposal, by virtue of its excessive height, mass and overall quantum of development together with the detailed design and proposed external materials represents an unacceptable form of development that would detract from the character of the area. The proposed development would cause significant harm to the character of the area and would be contrary to policies 7.1, 7.4 and 7.6 of the

London Plan 2016, Policies SP4 and DM10 of the Croydon Local Plan 2018 and Croydon Suburban Design Guide Supplementary Planning Document 2 April 2019.

2. The proposal, by virtue of the removal of existing quality trees and hedges, changes to land levels and insufficient opportunity for and information on replacement planting and landscaping, would have a detrimental impact on biodiversity and trees and would be contrary to policies SP7, DM10, DM27 and DM28 of the Croydon Local Plan 2018

### 3.0 PROPOSAL AND LOCATION DETAILS

3.1 The proposal includes the following:

- Demolition of two existing detached houses
- Erection of a part four, part five storey building to create 23 residential units including 4 x 3 bedroom (17.5%), 9 x 2 bedroom (39%) and 10 x 1 bedroom (43.5%).
- Provision of communal external amenity space and children's play space
- Provision of 12 off-street parking spaces
- Provision of associated refuse and cycle stores



*Image 1: Proposed street view (Northern Approach)*

3.2 During the course of the application, no amended plans have been received.

3.3 The main entrance into the building is centrally located via a level access path. At ground level the building on the southern side would be an under-croft parking area for nine vehicles and access to both internal refuse and cycle storage. A further three parking spaces are located to the front of the site, two adjacent to the southern boundary, the other (accessible) located adjacent to the north side boundary. All units have direct and level access from a central stair and lift core which forms part of a central access corridor at ground level. This 1.2 metre wide corridor also provides internal access to the rear of the site, refuse and cycle stores. To overcome the change in level of the site, the proposal includes extensive excavation to the rear which requires the removal of six trees and the inclusion of large retaining walls on both side

boundaries and along the rear of the site. All apartments would have private amenity spaces.



Image 2: Proposed ground floor/Site layout

3.4 The building would appear as four storeys with a slightly recessed fifth floor. The main frontage will be in line with neighbouring properties, however the building includes two front projections that will proud of the main façade and extend the full height of the building. The recessed fifth level also sits forward of the main façade.

### Site and Surroundings

3.5 The site comprises of two large detached dwellings located in a substantial plot to the west side of Pampisford Road. Overall, the site is 51.6m deep and 30.6m wide with a total area of 0.16ha. Both dwellings are set approximately 9 metres back from the frontage of the site. Hardstand areas for vehicle parking dominate the front of both properties with only minor landscaping. The dwellings are at a higher level than the highway with both plots gaining elevation to the west (rear) and north. There is up to a 6 metre rise on the site from street level to the rear property boundary. At the rear of the plots, an outbuilding is located towards the back of 71 Pampisford Road. A

number of established trees are also located within the rear gardens of both properties with the majority within the rear garden of 73 Pampisford Road. No TPO trees are present.

- 3.6 The wider area is predominantly residential comprising large detached dwellings in large plots similar to those on the site. Recently a number of sites on Pampisford Road have been granted permission for redevelopment. Redevelopment of 75 Pampisford Road (immediately to the north of the site) has been completed. These works involved the demolition of a single dwelling house and the construction of three dwellings (Planning Reference: 15/03878/P). A detached two storey house is located at 69 Pampisford Road to the south. Both adjoining properties have single storey garages located adjacent to the shared boundary with the site.
- 3.7 The site is characterised by low/moderate levels of public transport accessibility (PTAL 2) with PTALs ranging from PTAL 0-6. The site is located within 100 metres of PTAL 4 with the closest bus stop to the application site is located to the front of site..



*Image 3 – Aerial Photograph of Site and Surroundings*

### **Planning History**

- 3.8 19/04816/PRE Pre-application enquiries relating to the proposed demolition of existing dwelling, erection of part-three part four storey residential development of 23/24 flats (additional references: 19/02121/PRE, 19/03506/PRE)



*Image 4: Street elevation of Pre-application scheme*



*Image 5: Proposed Street Elevation*

#### **4.0 SUMMARY OF KEY REASONS FOR RECOMMENDATION**

- The proposed development would result in an unacceptable impact upon the character and appearance of the surrounding area.

#### **5.0 CONSULTATION RESPONSE**

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

##### **Lead Local Flood Authority (LLFA) (Statutory Consultee – in view of scale of development)**

5.2 At the time of writing this report, the LLFA were unable to provide comment as they were waiting for additional information from the consultant. Notwithstanding this, LLFA have stated that they would likely respond with a holding objection on the current proposal given the need for clarification of details to meet the LLFA requirements.

##### **Thames Water**

5.3 No objection with regard to impact on waste water network and sewage treatment works infrastructure capacity. With regard to surface water drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required.

## Ecology

- 5.4 No objection subject to securing biodiversity mitigation and enhancement measures. These can be secured by way of condition attached to any consent issued.

## Transport for London

- 5.5 No objection raised to the proposal. A total of 44 long-stay cycle spaces and 2 short-stay spaces should be provided in an accessible, convenient, secure and sheltered area. In terms of parking, it is suggested that parking be reduce from 12 spaces.

## Designing Out Crime

- 5.6 No objection raised subject to the inclusion of a Secure by Design condition included on any consent issued.

## 6.0 LOCAL REPRESENTATION

- 6.1 The application has been publicised by way of 15 letters of notification to neighbouring properties in the vicinity of the application site. Site notices were also erected in the vicinity of the site and a press note published. The number of representations received from neighbours in response to notification and publicity of the application are as follows:

No of individual responses: 50   Objecting: 47   Supporting: 3   Comment: 0

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

<b>Objection/comment</b>	<b>Officer comment</b>
<i>Housing Issues</i>	
The need for affordable housing within the area and to protect housing stock.	The proposed development includes 23 units with a mix of one, two and three bedroom units. Seven units would be London Affordable Rent units. It is officers view, that the proposed development would provide a good range of housing for local residential in terms of units sizes and also affordability.
Loss of family size accommodation and saturation of flats within the area	As discussed in paragraphs 8.2-8.13 the proposed development would provide a number of units of varying sizes that would be suitable for family units.
Internal unit layout – Specifically, three bedroom units should not be contained on single level.	As discussed in paragraphs 8.32-8.39 the quality of future accommodation within the development is considered acceptable in terms of layout and access.

<i>Townscape and Design</i>	
The scale and form of the development would be totally out of keeping with the character and appearance of the area	These issues are further explored in paragraphs 8.14-8.23 The overall mass of the development when compared to its surrounds is considered to be out of keeping with its surrounds to the detriment of the character of the locality.
<i>Scale of Development including density Issues</i>	The density of the proposal has been discussed within paragraphs 8.40-8.42. Although the actual density level proposed is not considered excessive given the sites proximity to the Purley town centre and areas with good public transport accessibility, the buildings overall mass is considered unacceptable.
Overdevelopment of the site	As outlined within the body of this report below, officers are of the opinion that this scheme constitutes an overdevelopment of this site. The reasons for this are outlined in the Townscape and Density Sections of this report.
Loss of green/open space	As outlined in paragraphs 8.24-8.29, officers are of the opinion that the quality and layout of open space/landscaping is inadequate.
<i>Neighbour Impacts</i>	
Loss of Daylight and Sunlight	The proposed development would result in some loss of light to secondary windows to the neighbouring property to the north. As addressed in paragraph 8.44-8.52 of this report, the impacts are considered minor and not sufficient grounds to withhold consent.
Increased sense of enclosure to neighbouring properties.	As discussed in paragraphs 8.45 below, given the topography of the site and existing vegetation (to be retained), the proposed development is not expected to result in an unreasonable impact on outlook from neighbouring properties.
Impacts upon Privacy/overlooking	As outlined within paragraphs 8.43-8.51 below, the scheme includes a number of design treatments that would limit overlooking of neighbouring properties. These, together with proposed setbacks

	are considered appropriate mitigation measures to protect privacy of neighbouring to reasonable levels.
<i>Highways, Traffic and Parking</i>	
<p>The proposal would have an impact upon traffic congestion within neighbouring street network.</p> <p>The number of parking spaces is insufficient and would result in further impacts upon on-street parking in the area.</p> <p>Safety concerns with regards to school children.</p>	<p>Highway, parking and wider transportation issues are covered in paragraphs 8.52-8.56 below.</p> <p>With regards to pedestrian safety, vehicles would be able to enter and exit the site in a safe manner, thereby not resulting in a scheme that would have any greater risk to any pedestrians (including school children) walking along this section of Pampisford Road.</p>
<i>Trees, landscaping and Biodiversity (wildlife)</i>	
<p>Loss of trees and vegetation.</p> <p>Biodiversity and wildlife would be significantly reduced.</p>	<p>The trees required to be removed are proposed to be replaced. Council's Ecological experts have reviewed the proposal and consider the mitigation measures outlined within the Ecological Assessment to be sufficient to safeguard against adverse impacts upon wildlife.</p>
<i>Other Issues</i>	
<p>Extra pollution and noise disturbance. Pollution from extra cars.</p>	<p>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. The additional impact on the highway network is considered to be negligible.</p> <p>The Council's Environmental Health Team have no objection to the proposals – subject to the imposition of standard conditions to protect future occupiers from noise and to limit impact on existing neighbours (construction logistics).</p>
<i>Non-Material Issues</i>	
Devaluation of properties	

6.3 The following Councillors have made representations:



Cllr Badsha Quadir (Ward Councillor). Objection to proposal for the following reasons:

- This application would be a loss of a family home which are now becoming very hard to find due to more and more applications.
- Loss of natural habitats and trees.
- There would be a significant amount of noise levels in a residential area.
- There is an accumulative amount of applications from family homes to flats in Purley.
- There would be loss of light for the neighbours of 71-73 as the building is taller than the current home.
- Along with loss of light there would be a great deal of privacy lost for the neighbours.
- There will not be enough space to accommodate for parking, especially being on a main road for 27 flats.

6.4 Purley and Woodcote Resident's Association have objected as follows:

- Over intensification of development in terms of size, bulk, scale and massing.
- Detrimental impact on surrounding residential area.
- Loss of a family home
- Overdevelopment of the site
- Overdevelopment of the site resulting in inadequate amenity space for potential occupiers
- The design is totally out of keeping with the locality and surrounding townscape
- Detrimental to the amenity of occupiers of adjoining properties. Given the size and scale of this revised 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 increased traffic movements so greatly endangering road safety.

## **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:

- Delivering a sufficient supply of homes
- Promoting sustainable transport;

- Achieving well designed places;

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

#### 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
- 3.9 Mixed and balanced communities
- 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
- 7.8 Heritage Assets and Archaeology
- 7.14 Improving air quality
- 7.19 Biodiversity and access to nature
- 7.21 Woodlands and trees

#### 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
- DM27 Biodiversity
- DM28 Trees
- SP8 Transport and communications
- DM29 Promoting sustainable travel and reducing congestion
- DM30 Car and cycle parking in new development

## Emerging New London Plan

7.4 Whilst the emerging New London Plan is a material consideration, the weight afforded to it is down to the decision maker, linked to the stage a plan has reached in its development. The New London Plan remains at an advanced stage of preparation but full weight will not be realised until it has been formally adopted. Despite this, in accordance with paragraph 48 of the NPPF substantial weight can be applied to those policies to which the Secretary of State has not directed modifications to be made.

7.5 The policies of most relevance to this application are as follows:

- D1 London's form, character and capacity for growth
- D2 Infrastructure requirements for sustainable densities
- D3 Optimising site capacity through the design-led approach
- D4 Delivering good design
- D5 Inclusive design
- D6 Housing quality and standards
- D7 Accessible housing
- H1 Increasing housing supply
- H10 Housing size mix
- S4 Play and informal recreation
- G6 Biodiversity and access to nature
- G7 Trees and woodlands
- SI1 Improving air quality
- SI2 Minimising greenhouse gas emissions
- SI3 Energy infrastructure
- SI5 Water infrastructure
- SI7 Reducing waste and supporting the circular economy
- SI12 Flood risk management
- SI13 Sustainable drainage
- T1 Strategic approach to transport
- T2 Healthy streets
- T3 Transport capacity, connectivity and safeguarding
- T4 Assessing and mitigating transport impacts
- T5 Cycling
- T6 Car parking
- T6.1 Residential parking
- T7 Deliveries, servicing and construction
- T9 Funding transport infrastructure through planning
- DF1 Delivery of the plan and planning obligations

7.6 There is relevant Supplementary Planning Guidance as follows:

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

## **8.0 MATERIAL PLANNING CONSIDERATIONS**

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

1. Principle of development (housing)

2. Affordable housing and housing mix
3. Townscape, design and visual impact
4. Housing quality for future occupiers
5. Residential amenity for neighbours
6. Parking and highway safety
7. Trees, landscaping and biodiversity
8. Flood risk
9. Sustainability
10. Other planning matters

### **Principle of Development (Housing)**

- 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 increased targets which need to be planned for across the Borough, but the windfall amount of housing is broadly similar (if slightly higher) than the Croydon Local Plan figures. 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 This presumption includes Purley, which is identified in the "Places of Croydon" section of the CLP (2018). In broad location terms the main focus of major residential growth will be in and around the District Centre with high quality residential development that will respect the existing residential character and local distinctiveness. 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 accords with all other relevant material planning considerations, the principle of development would be supported. In this case, the proposal does not provide acceptable development in respect of other relevant material considerations and therefore the application cannot be recommended for approval. These issues are discussed in detail below.

## Affordable housing and housing Mix

### Affordable Housing

- 8.5 The London Plan (Policies 3.10-3.13) requires Boroughs to seek to maximise affordable housing provision. The Croydon Local Plan (2018) sets out a minimum level of affordable housing on sites with ten or more dwellings, such as this scheme. The CLP (2018) states that the Council will negotiate to achieve up to 50% affordable housing, subject to viability and will seek a 60:40 ratio between affordable rents homes and intermediate (including shared ownership) homes unless there is an agreement with a Registered Provider that a different tenure split is justified. There is a minimum requirement of affordable housing (all subject to viability) to be provided either as:
- 30% affordable housing on the same site as the proposed development; or
  - 15% if the site is in the District Centre and 15% affordable housing on a donor site with prior planning permission within the same place as the District Centre; or
  - 15% affordable housing on the same site as the proposed development plus a Review Mechanism entered into for the remaining affordable housing (up to the equivalent of 50% overall provision through a commuted sum based on a review of actual sales values and build costs of completed units) provided 30% on-site provision is not viable, construction costs are not in the upper quartile and there is no suitable donor site.
  - The policy states that anything offered below any of these requirements would be refused.
- 8.6 This approach is supported by the Mayor's Affordable Housing and Viability Supplementary Planning Guidance (SPG) (2017), which contains guidance for LPAs assessing affordable housing offers and viability appraisals. Provision of affordable housing is of critical importance in Croydon borough, where, despite policy requirements, in reality around 91% of new homes need to be affordable for residents on lower incomes. Of particular importance within this is the provision of affordable rented homes, which is reflected in the wording of the policy.
- 8.7 The proposal is for 23 flats. As submitted, the application proposes 30% affordable housing based on units and 35% based on habitable rooms. All Affordable Housing units would be located on the ground and first floor level (1x 1 bed, 2 x 2 bed and 4 x 3 bed units).
- 8.8 The proposed tenure split is 100% London Affordable Rent (LAR). Although this deviates significantly from Council's preferred 60:40 split, the proposed offer of LAR units is generally seen as advantageous as it would provide much needed affordable rental accommodation within the Borough. The proposed affordable housing is also supported by the RP (Optivo) who are joint applicants.
- 8.9 Notwithstanding the abovementioned offer of 30% with 100% LAR, as the scheme does not proposed 50% Affordable Housing, CLP Policy SP2.5 requires a viability report be submitted to demonstrate that such a provision is not possible. A Financial Viability Assessment (VFA) was submitted and independently reviewed. The review broadly agreed with the assessment figures provided within the FVA and concluded that a full policy compliant affordable housing provision is not possible and that the scheme could only provide a lower quantum of affordable housing than has been offered.

8.10 As it stands, the local planning authority is satisfied with the proposed offer of 30% Affordable Housing as the applicant has demonstrated that they have engaged with Registered Provider in order to provide affordable units on the site, it meets the RPs need and it is a greater quantum of affordable housing than the scheme can viably provide. As such, taking all matters into account the application meets the policy requirements of Policies 3.10-3.13 of the London Plan and Policies SP2.4 and SP2.5 of the Croydon Local Plan (2018).

#### Housing Mix

8.11 CLP Policy DM1.2 seeks to prevent the net loss of 3-bedroom homes (as originally built) and homes less than 130sqm. The existing dwellings are large detached properties, both greater than 130sqm in area. All of the proposed units have floor spaces of less than 130sqm and 4 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.

8.12 Policy SP2.7 seeks to ensure that a choice of homes is available to address the borough's need for homes of different sizes and that this will be achieved by setting a strategic target for 30% of all new homes up to 2036 to have three or more bedrooms. Policy DM1.1 requires a minimum provision of homes designed with 3 or more bedrooms on sites of 10 or more dwellings. In suburban settings with PTALs of 2, the requirement is 70% 3+ bedroom units. The policy goes on to say that the only exceptions to this would be where there is an agreement with a Registered Provider that three bedroom dwellings are not viable or required as part of the affordable housing offer, or where viability demonstrates that larger homes would not be viable, two bedroom four person homes could be considered as family units (within three years of adoption of the CLP).

8.13 There are 4 x three bedroom units provided in the scheme, equating to 17.5%. Nine of the two-bedroom units have been designed to accommodate 4 persons and when including the two-bedroom units, the scheme would provide 56.5% family sized units. The unit mix has been agreed with an RP who have stipulated their requirement for a mix of 1, 2 and 3 bedroom units to achieve a balanced and sustainable community. Although the mix falls just short of the 70% family sized units, the scheme would result in a net increase in the number of family size units on the site. In addition, the unit mix would be the preference of the RP interested in scheme. As the applicant has demonstrated that the mix has the agreement of a RP and also that it would replace existing family sized units on the site, the proposal meets with the policy requirement in terms of three bedroom or family sized units. As such, the proposal does accord with Policies SP2.7 or DM1.1 of the Croydon Local Plan (2018).

FLAT NO.	LAR	UNIT SIZE	LONDON PLAN SPACE STANDARD	GIA M2	PRIVATE AMENITY SPACE M2
1	YES	1BED 2P	50	53.7	5
2	YES	2BED 4P	70	71.9	8.9
3	YES	2BED 3P	61	65.9	56.2
4	YES	3BED 5P	86	93	8.1
5	YES	3BED 5P	86	94	8.1
6	YES	3BED 5P	86	97.3	15.2
7	YES	3BED 5P	86	99.1	15.5
8		2BED 4P	70	71.3	8.5
9		1BED 2P	50	50	5
10		2BED 4P	70	70	14.8
11		2BED 4P	70	70	14.8
12		1BED 2P	50	50	5
13		2BED 4P	70	70.1	8.4
14		2BED 4P	70	71.3	8.5
15		1BED 2P	50	50	5
16		2BED 4P	70	70	14.8
17		2BED 4P	70	70	14.8
18		1BED 2P	50	50	5
19		2BED 4P	70	70.1	8.4
20		2BED 3P	61	63.6	8.5
21		2BED 3P	61	61.9	17.7
22		2BED 3P	61	62.5	17.7
23		2BED 3P	61	61.9	8.8
<b>TOTAL</b>	<b>30% units (35%hr)</b>	<b>23</b>		<b>1847.2</b>	

*Image 6 Proposed unit mix and tenure*

### **Townscape and Visual Impact**

- 8.14 The existing properties are not statutorily listed or locally listed and does not fall within a conservation area. Whilst the dwellings contains some attractive qualities, they are of no particular architectural merit nor do they contribute significantly to the character of the area. As such, there is no objection to their demolition.
- 8.15 The properties situated in the surrounding area comprise varied architectural forms in terms of their scale and appearance. Predominantly the area is characterised by large detached dwellings of mostly two storey with pitched roofs. The building line to the west side of Pampisford Road is generally consistent as is plot size and shape. A detached single dwelling at 75 Pampisford Road has recently been replaced by 3 x two storey dwelling houses. Their height, setback and overall design is consistent with the prevailing character of the street.
- 8.16 Both plots that form the site are rectangular in shape with the dwellings located towards the front of the site. The front of the properties together with neighbouring properties are dominated by hardstand area for vehicle parking. The hardstand area and lack of vegetation means that both dwellings together with neighbouring properties are dominant features within the street scene.

8.17 In terms of design approach, the proposal is stated to be a “Contemporary Reinterpretation”, however, it is not clear on what is being reinterpreted. Paragraph 2.22 of the SDG suggests that a Contemporary Reinterpretation approach generally incorporates the use of contemporary materials with more traditional building forms or the use traditional materials with contemporary detailing. The proposal has not incorporated either of these approaches to its design and therefore fails to incorporate any prevailing architectural character of surrounding buildings in terms of height, materials, form, and massing.

8.18 In terms of height, Section 2.10 of the Suburban Design Guide SPD (2019) suggests appropriate ways of accommodating intensified development on sites based on the site’s context. It 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.

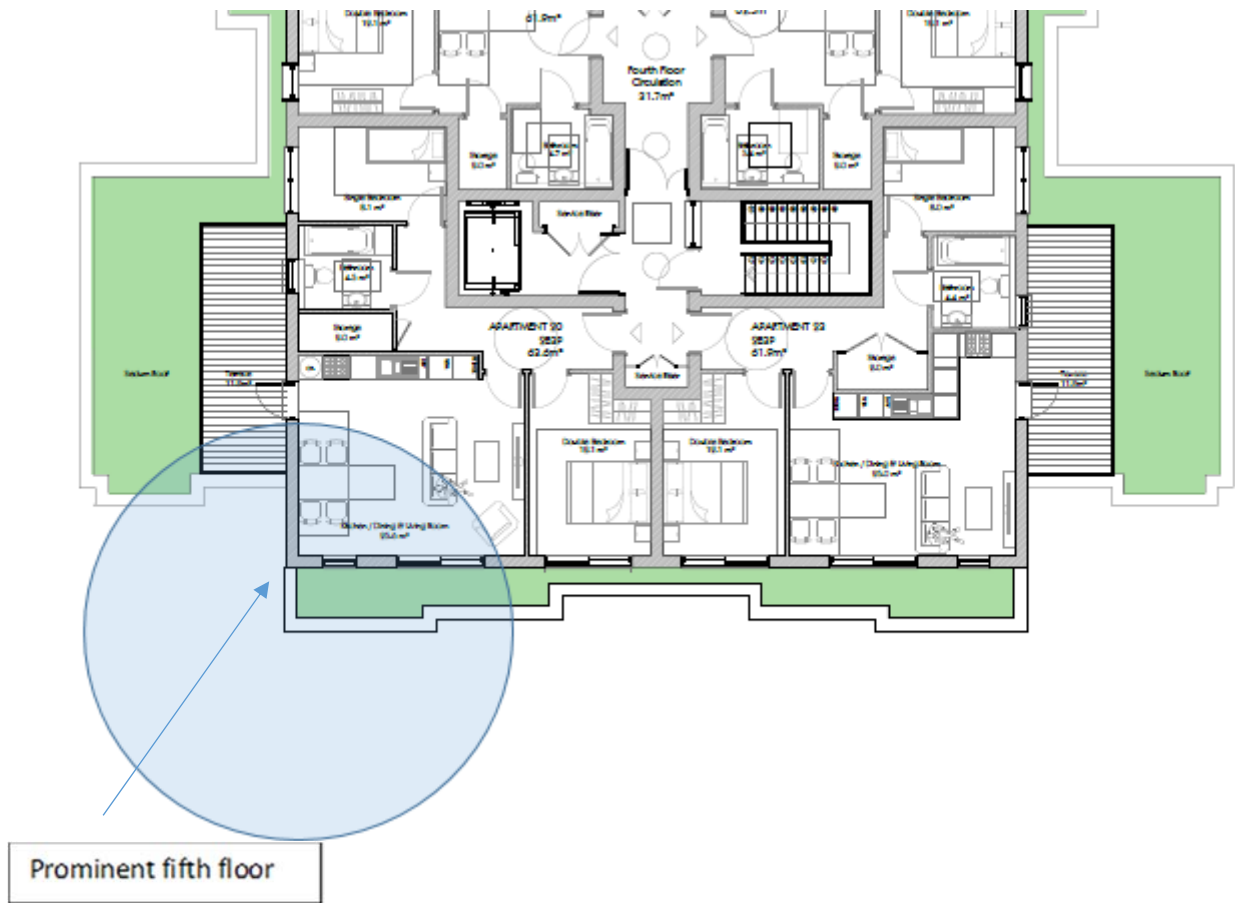


Figure 2.10c: Where surrounding buildings are predominantly detached dwellings of two (2) or more storeys, new developments may be three (3) storeys with an additional floor contained within the roof space or set back from the building envelope below.

*Image 7 – Extract from SDG Section 2.10 (Figure 2.10C)*

8.19 The proposed building is four storeys with a set-back fifth floor. Although, the northern section of the ground level would be partly below existing ground level, it would still read as a full storey in the street scene and could not be considered a ‘lower’ ground floor. In addition, although the fifth floor is slightly recessed (less than one metre) from the building’s façade, it would sit above the section of building that would project forward of the primary elevation and not recess on either side. The presence of this level in the street scene is further exacerbated by the topography of the street particularly when viewed from the southern approach. The result would be a building that read as a four storey building with recessed, but clearly visible fifth floor. The proposal is contrary to policy 2.10 of the SDG.





*Image 8 – Details of fifth floor*



*Image 9 – Front Elevation – Southern Approach*

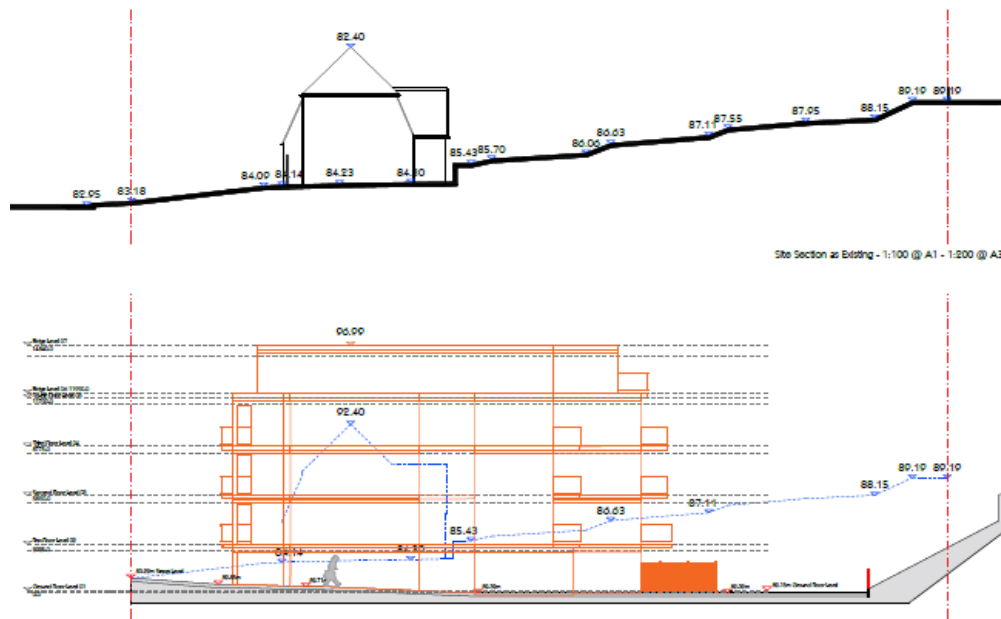
8.20 In terms of materials and external appearance, Policy 2.21 of the SDG suggests that primary facing materials should be largely informed by the context of the surrounding built form. Materials that differ from the context of the area may be accepted where they are part of a compelling and respectful design. The material palette proposed is Leicester brick (yellow), Funton Old Chelsea brick (yellow/brown) and soft brown and grey zinc cladding. These contrast with the prevailing materials in the area where there

is a prominence of render, terracotta wall tiles, concrete roof tiles and timber details to facades. Additionally, the uniform rhythm of window openings and balconies on the building's façade do not appear to form part of the overarching architectural character of the locality and do not help to adjust the way the proportions, scale, mass and height of the building would be perceived within the street scene. The impact of the materials is compounded by an architectural form that does not respect the prevailing domestic two storey scale of buildings with dominant hip and or gable roof forms that presented to the street.

- 8.21 The contemporary design proposed would present a largely rectangular built form with parapet at fourth floor with a somewhat recessed fifth floor. Although the side flanks of the proposal maintain the predominant building line along Pampisford Road (SPD2 2.17) the protruding elements at the front of the proposal do not respond to the gap in built form that currently exists across the boundary between 71 and 73 Pampisford Road. The front of proposed building appears flatter and more massive due to the roof form and number of storeys. The excessive height of the building is further worsened by absence of any attempt to reduce the apparent bulk of the building, particularly adjacent to the side boundaries. The four storey flank walls are located only 1.5 metres from the side boundary thereby emphasising the difference in height of the proposed to its neighbours. Further, the extensive and largely unbroken use of the Leicester (Yellow) brick on the façade would further emphasise the buildings difference in width and overall mass from its neighbours and surrounds.
- 8.22 The proposal incorporates forecourt parking and an undercroft, with a roller shutter to the undercroft. Generally hardstanding forms a feature of the frontage of buildings in the area and so is considered acceptable in this instance, subject to conditions to secure adequate screening planting. The undercroft arrangement is considered a satisfactory solution to the accommodation of parking and the roller shutter, if well designed, would be an acceptable design feature of the building.
- 8.23 Overall, the height and mass of the proposed building does not reflect that of the surrounding built form. The impact of this has not been mitigated through the design or use of materials that are sympathetic to neighbouring buildings, thereby resulting in a building that would be visually dominant within the street. Officers are therefore not satisfied that the proposed development would be visually appropriate to the detriment of the town scape in this part of the borough. The proposal is therefore contrary to the requirements of the abovementioned policies.

### **Landscaping, excavation and trees**

- 8.24 The proposal would involve significant excavation to the rear of the site resulting in the need for high retaining walls along both side and rear boundaries. The excavation would be in excess of five metres in parts as illustrated by image 10 below. Section 2.20.1 and 2.35.1 of the SDG state that any retaining walls must be integrated into the design and where possible be incorporated into the landscaping proposal. Large, blank retaining walls should be avoided and would not be accepted if they impact upon the amenity of neighbouring properties or street scene. Little detail of the retaining walls have been provided, however plans indicate that on the side boundaries these retaining walls would have to be vertical and located immediately adjacent to the boundary in order for the layout to work. The retaining wall to the rear would be steeply sloped up to the rear boundary line. No detailing of terracing or integrating the retaining walls into the overall landscaping of the site has taken place.

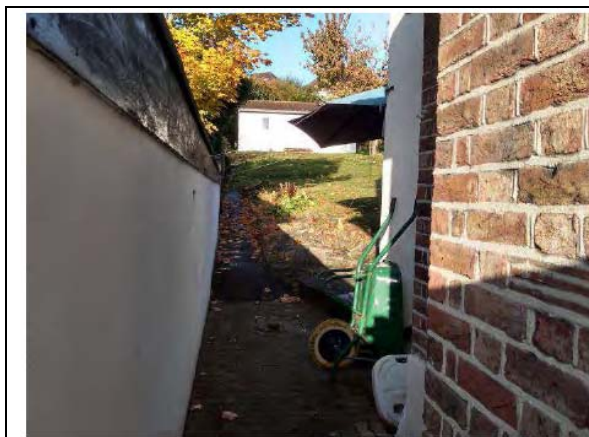


*Image 10 – Section and site level details*

- 8.25 A total of eight trees are proposed to be removed, which includes 5 Grade B trees. These include two trees (Chinese Privets) located at the front of No.73 adjacent to the northern side boundary, a group of 4 beech trees located in the north-west corner of No.73 and a mature wild cherry located within the rear garden of No.71. In addition, the excavation works along the northern side boundary are also likely to impact upon the root system of the Yew hedge located on the neighbouring property adjacent to the boundary.
- 8.26 The submitted arborist report concludes that the trees to be removed are not of particular value and to mitigate their loss suitable trees and shrubs should be planted post construction as part of a comprehensive re-landscaping scheme. With regards to the impacts upon the Yew hedge, the report concludes that the impact to the root system should be minimal (less than 20%) and not affect the long term health of the hedge. Council's Tree Officer raised concern to the removal of trees without a more comprehensive landscaping scheme being submitted that demonstrates how their loss will be mitigated especially given the loss of Grade B trees. Concern is also raised with the ability to ensure that no more than 20% of the root system of the Yew hedge along the northern boundary can be protected when such extensive excavation.
- 8.27 A simplistic landscaping scheme has been submitted and shows that a number of existing trees will remain around the perimeter of the site. The majority of these trees are located on adjoining plots and therefore would maintain some mature vegetation around the site and would effectively screen the expansive retaining walls from neighbouring properties.
- 8.28 In terms of replacement planting, the landscaping scheme shows that a number of trees (Silver Birch) would also be planted along the rear boundary of site. A variety of hedging, trees and shrubs are proposed within the garden areas adjacent to the private amenity areas. The majority of the rear of the property would consist of lawn. To the front, soft landscaping would be located along the front boundary and would consist of lawn edged with hedging and three flowering cherry trees.
- 8.29 Officers are of the opinion that insufficient detail has been provided to determine the acceptability of the landscaping in terms of mitigating the loss of existing vegetation,

protecting biodiversity and deliverability. In terms of mitigating the loss of trees, given the level of excavation it is difficult to see how such planting could be achieved particularly with regards to the planting of trees along the rear boundary and lawn on the steeply sloping rear section of the garden (retaining embankment). Given the topography of the site (as shown in photos below) and the presence of many mature trees around the perimeter of the site, officers are of the opinion that a more sympathetic landscaping and topographic approach is required. A landscaping scheme that included terracing of the retaining walls to allow for both the retention of trees along the boundary, protects root systems on neighbouring properties and opportunity to enhance biodiversity. It may be possible to retain more trees as a result of this. Additionally, such an approach would significantly lessen the amount of excavation required without necessarily preventing the development achieving reasonable levels of communal amenity space for residents.

8.30 The proposed landscaping at the front of the site, would be an improvement to the current hardstand area.



*View from southern side of No.71 Pampisford Road*



*Rear Garden of No.71 Pampisford Road*



*Yew Hedge on boundary between 73 and 75 Pampisford Road*



*View from back of No.73 Pampisford Road*

*Above photos are extracts from the Contamination report prepared by ST Consult (Environmental & Geotechnical*

## **Ecology**

8.31 The site is subject to policy designations relating to ecology and a ecological assessment of the site has been undertaken. The proposal was reviewed by ecology consultants

who concluded that subject to appropriate mitigation measures being implemented (such as the provision of bird and bat boxes and bat tubes) the scheme would not have an unacceptable impact upon protected and priority species and habitats.

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

- 8.32 All of the proposed new units would comply with the internal dimensions required by the Nationally Described Space Standards (NDSS).
- 8.33 Step free access is proposed into the building from the highway and also from the car park, refuse and the bike store which are all located within the under-croft component of the building. In terms of accessibility, the London Plan sets requirements for 10% of homes to be designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users. The building has a lift and stair core to all levels and 10% of the units have been designed to the standards set out under Building Regulations M4(3). The proposal would therefore be in compliance with London Plan policy in this regard.
- 8.34 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. Private amenity space has been provided for all units in the form of private gardens and terraces for the ground floor units and balconies/terraces for the upper floor units, all of which accord with the minimum standards and with some upper level units have direct aspect to more than one balcony. The provision of private amenity space is acceptable.
- 8.35 In addition to each unit having compliant areas of private amenity space, the proposal also includes communal amenity space to the rear of the site.
- 3.36 Based on the unit mix, the London Plan requires that a total of 102.1sqm of child play space be provided. The landscape plan shows that 90sqm of child play space would be located within the communal amenity space to the rear of the site. The plan lacks detail of the area to be provided, however the rear communal area is significantly larger and large enough to provide sufficient play space. Although, falling short of the 102.1sqm required, this space would be supplemented by the private areas of amenity space provided to each of the units capable of accommodating families. Access to the area would appear to be step free and therefore considered accessible and inclusive in accordance with Policy DM10.5 of the CLP.
- 3.37 The units have been arranged so all but one are dual aspect. The single aspect unit is a one bedroom unit at ground level that faces eastwards (Street frontage). In terms of daylight, a daylight/sunlight report was submitted and concluded that all habitable rooms within the building would achieve the minimum internal daylight levels required by the BRE guidelines. As such, the development overall is considered to provide adequate levels of light for future occupiers.
- 3.38 The placement of windows and areas of private open space have been done in such a way as to prevent any unreasonable overlooking between units within the building. Where windows or areas of private open space are close to overlooking sources, suitable privacy treatments have been proposed to ensure that the privacy levels of each unit is of a reasonable level.
- 3.39 The proposed scheme is likely to provide good sized units with suitable internal living conditions for future residents in terms of privacy, daylight, access and private open space in accordance with Policy DM10.4 and DM10.5 of the CLP.

## **Residential Density**

- 8.40 The site has a suburban setting with a PTAL rating of 2 and as such, Table 3.2 of the London Plan indicates that the density levels ranges of 150-250 habitable rooms per hectare (hr/ha) with an expectation of no more than 95 units per/hectare. Treating the combined living/kitchen/dining areas as a single habitable room, the proposed density of development would equate to around 425 habitable rooms per hectare and 143 units per hectare.
- 8.41 As Members will be aware, the London Plan 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. As such, it is of relevance that the site is located within 100 metres of PTAL 4 and also within easy walking distance (600m) to the Purley town centre. Because of these two factors, it is not unreasonable to expect the site capable of accommodating density's more consistent with that of an urban site (200-450hr/ha or up to 170 units/ha). Based on this scenario, the proposed density level is not in itself unreasonable.
- 8.42 Notwithstanding this, the concerns of the development in terms of scale, mass, layout and appearance has been discussed earlier in this report and represent an important dimension when determining the acceptability of a particular density of development. When factoring in these issues, the accumulative impacts results in a scheme that is unacceptable in terms of its size and consequently, the density of the scheme in this instance must be considered excessive and contrary to policy.

## **Residential Amenity (Daylight/Sunlight, privacy and outlook) for Neighbours**

- 8.43 Paragraph 127(F) of the NPPF states that planning decisions should ensure a high standard of amenity for existing and future users of land and buildings. Policy 7.1 of the London Plan (2016) indicates that in their neighbourhoods, people should have a good quality environment. Policy DM10.6 of the Croydon Local Plan (2018) states that proposals for development should ensure that the amenity of the occupiers of adjoining buildings are protected.
- 8.44 Residential properties are located on either side and to the rear of the site. In response to Policy DM10.6 of the CLP, 2.11 of the SDG provides design guidance to how the amenity of neighbouring properties can be protected. The proposal generally accords with these guidelines in terms of meeting the 45 degree rule. However it could be argued that the height of the flank walls do not minimise the visual intrusion when viewed from the neighbouring properties. Notwithstanding this, given that both adjoining properties have garages located along the adjacent boundaries and that the proposed excavation means that the building would be lower when viewed from the neighbouring properties, the proposal is not expected to result in an unreasonable/overbearing outlook from neighbouring properties. The extent of existing vegetation along the side and rear boundaries would further reduce the visual impact of the development on all neighbouring properties.
- 8.45 The neighbours affected by the proposed development are the immediate neighbours (69 and 75 Pampisford Road).

### 75 Pampisford Road

- 8.46 This property is located to the northern side of the site and consists of recently constructed two storey semi-detached dwelling with an additional floor located within the roof space. A single attached garage is located on the southern side of the dwelling and is located approximately one metre from the boundary with the subject site. The main house is located approximately 4.1 metres from the boundary with the subject site.
- 8.47 In terms of daylight and sunlight, there are four windows located on the southern side of the dwelling, two of which have been identified as serving habitable rooms. These are located at ground level and are secondary windows to a large living area. These windows would be affected by the proposal and would result in a loss of daylight and sunlight greater than BRE Guidelines. However, the room would retain acceptable levels of daylight and sunlight from the existing rear glazed doors and large rooflight, both of which are not expected to be impacted by the development. Impacts upon daylight and sunlight to No.75 Pampisford Road is considered reasonable and not contrary to relevant policy.
- 8.48 In terms of privacy, the scheme proposes a number of windows and balconies that would face 75 Pampisford Road. To mitigate overlooking, the windows would consist of fixed and obscure glazing up to a height of 1.7 metres. Balconies would also include privacy screening to prevent direct overlooking of neighbouring windows or the first 10 metres of the private amenity spaces located to the rear of the property. Privacy between properties is considered to be reasonable for the suburban context.

### 69 Pampisford Road

- 8.49 This property is located immediately to the south of the site and is a two storey detached residential dwelling. A single storey garage is located adjacent to the boundary with the site. Two windows are located on the northern side of the dwelling approximately 4 metres from the boundary, both appear to be secondary windows to a room that has a large east facing window. Given the orientation of these windows, a daylight/sunlight assessment was not considered necessary as the proposed development would not result in any loss of sunlight. In terms of daylight, given the separation between buildings, this is also not expected to result in any noticeable reduction. With regards to privacy, the position of windows and setbacks would result in little opportunity for direct overlooking of these windows.

### *Other neighbouring properties*

- 8.50 Although neither of the adjacent properties raised concern over the development, properties to the rear of the site have raised concerns with the scale of development and impact upon local amenity. Issues raised have been discussed within the body of this report. With specific regards to the properties to the rear, given the topography of the site, level of retained vegetation and the extent of excavation, the height and overall mass of the proposed building would not result in unacceptable impacts upon the visual amenity, privacy or impact upon daylight/sunlight to properties to the rear (west).
- 8.51 In summary, whilst the proposed development would inevitably modify the street scene and therefore the outlook from surrounding residential properties. In terms of direct impacts upon neighbouring residents, any impacts are expected to be minor and not sufficient grounds to refuse the scheme.

## Highway Safety, Access and Parking

- 8.52 Policies 6.3 and 6.13 of the London Plan (2016) along with Table 6.2 set out parking standards for proposed development. Policies SP8.17, DM29 and DM30 of the Croydon Local Plan (2018) provide further guidance with respect to parking within new developments and state that development should not adversely impact upon the safety of the highway network.
- 8.53 The site has a PTAL of 2 indicating low access to public transport. However, the site is located just outside the PTAL 4 area and is within 600 metres of the Purley town centre. Table 6.2 of the London Plan proposes that a scheme of this density should provide up to 1 space per unit for developments with a PTAL of between 2 and 4.
- 8.54 12 on-site parking spaces are proposed with nine located within an 'under-croft' parking area located at the ground level. Two of the spaces would be wheelchair accessible spaces. Current parking standards suggest that up to between 1 and 1.5 spaces would be required per unit. The draft London Plan suggests one space per unit in outer London areas with low PTAL. In addition, TFL have suggested that fewer on-site parking spaces should be considered. Therefore, the amount of parking required would range between 12 and 23 spaces. The on site parking level (12 spaces, 52% of the maximum requirement) is less than expected for the location, and could reasonably result in approximately 11 vehicles parking on the street. A parking stress test showed that current stress levels are approximately 60% (roughly 25 space spaces). Overspill parking is not expected to push on-street parking stress to unacceptable levels.
- 8.55 Although the proposal does not include 1:1 parking and would place some additional pressure on on-street parking, on balance, parking is considered reasonable given that proposed spaces would provide suitable blue badge spaces and spaces for family sized units, and also that all future residents would have good access to nearby public transport. However, were other concerns with the scheme not to exist, further analysis of cumulative impact with other schemes would be required and mitigation measures, such as provision of car club spaces (proposed by the applicant), contributions to amend parking restrictions and contributions to promote sustainable travel would be likely to be necessary.
- 8.56 Officers are satisfied that vehicles will be able to enter and exit the car parking spaces safely. With the exception of the lone parking space adjacent to the northern side boundary, vehicles would be able to exit the site in a forward gear. Notwithstanding this, a person would be able to also safety reverse into the single space on the northern side thereby maintain safe exiting from the site for all vehicles. Further, plans demonstrate that 2x2 metre sightlines are provided and as such the safety of pedestrians and other road users would be suitably respected. Adequate sightlines would need to be provided – details of which would be secured when discharging landscaping and boundary treatment details.

## Cycle Storage

- 8.57 The development generates a need for 44 cycle storage spaces to accord with draft London Plan requirements. A total of 41 spaces are shown to be provided for future occupiers within two ground level storage areas. These spaces are at a rate of 1 space for 1 bed units and 2 spaces for other units. Given the number of vehicle parking spaces, proximity to both bus stop and the Purley town centre, on balance the number



of cycle spaces is considered reasonable. The location and layout of the cycle storage is also considered satisfactory. Notwithstanding this, specific details regarding the cycle storage layout including the type and location of stands would need to be conditions if consent for the scheme was given.

### Refuse Storage

- 8.58 Sufficient space has also been provided to accommodate refuse storage within the under-croft element of the development. The entrance is located within 20 metres of the kerb and is accessible via the vehicle parking area and the internal lobby/corridor. However as the rear of the store is further than 20m, a successful scheme is likely to need a management plan to ensure this can be adequately serviced, potentially by a private contractor.

### Other Highway Impacts

- 8.59 An initial Construction Logistics Plan was submitted as part of the application and the approach outlined within the document is considered to be acceptable by the Council's Environmental Health team. Notwithstanding this, in order to ensure that the proposed development would not have any adverse impact on the highway network or on the surrounding residents, a detailed Construction Logistics Plan (CLP) will be required by pre-commencement condition if the scheme was to be granted consent.

### **Flood Risk and SuDS**

- 8.60 The site has a low risk of fluvial flooding (Flood Zone 1) and the majority of the site is at a very low risk of surface water flooding, however there are small areas to the rear of each dwelling which are at a low risk of flooding which is caused by overland flow ponding in low lying areas of the site. Other flood mapping indicates that the site has limited potential for other sources of flooding. Surface water run off that will be produced as a result of this development will be dealt with through the use of sustainable urban drainage systems (SuDS) as required by CLP Policy DM25. The submitted Flood Risk Assessment and Drainage Strategy (FRA) sets out a runoff management strategy from the various parts of the site including: Two rainwater harvesting tanks, sedum roof areas, permeable paving and attenuation tank. Given the topography of the site, soakaways are not proposed. If consent was to be granted, then it is recommended that a SUDs condition be imposed.

### **Sustainability**

- 8.61 CLP Policy SP6.3 requires all new build residential development of more than 10 units to achieve the London Plan or national technical standard for energy efficiency performance whichever is higher and new build development to meet a minimum water efficiency standard of 110 litres/person/day. The submitted sustainability assessment states that the use of energy efficient measures including low fabric u-values, high efficiency heating systems with flue gas heat recovery and mechanical ventilation with heat recovery together with the use of extensive Solar PV units would result in a average reduction in CO2 emissions of 42.45%, exceeding the London Plan requirement of 35% on site. No detail of water efficiency standards were provided.
- 8.62 Conditions could be imposed in relation to carbon emissions and water use targets for the development, with a financial contribution provided where 'Zero Carbon' is not achievable on site. This would be secured through a legal agreement if the

development was acceptable. This could effectively address sustainability issues, in compliance with policy.

## **Other Matters**

### Contamination

- 8.63 A desk study undertaken and did not identify any issues that would preclude the site being used for residential purposes. However, it is recommended that if consent was issued for the proposal, a condition is recommended to ensure appropriate investigation, management and remediation.

### Employment and Training

- 8.64 An employment and training strategy and contribution would be secured through a legal agreement to ensure the employment of local residents during construction, if the recommendation were for approval.

### Air Quality

- 8.65 Council's Environmental Health reviewed the Air Quality Assessment and were satisfied that the recommendations suitably safeguarded against adverse impacts upon air quality. If the recommendation were to grant planning permission, it is considered that air quality impacts arising from the development could be managed through an appropriately worded condition requiring the submission of an air quality assessment and management plan. A financial contribution towards air quality management would also be secured through a legal agreement, if the development were to be supported. Managing short term air quality issues arising from construction e.g. dust impact could be addressed within a Construction Method Statement, also to be secured by a condition.

### Community Infrastructure Levy

- 8.66 If permitted, the development would be liable for a charge under the Community Infrastructure Levy (CIL). This payment will contribute to delivering infrastructure to support the development of the area, such as local school.

## **Conclusions**

- 8.67 Whilst it is accepted that the proposed scheme would provide a good number of new dwellings of which a reasonable number would be much needed London Affordable Rent units, the proposed development by reason of its mass, height and overall density would result in a building that would have a significant impact upon the street scene to the detriment of the character of the wider locality.
- 8.68 All other relevant policies and considerations, including equalities, have been taken into account.
- 8.69 For these reasons and as outlined in detail throughout this report, it is recommended that the proposed development is REFUSED planning permission.