

**1.0 APPLICATION DETAILS**

Ref: 20/03470/FUL  
 Location: 5 Russell Hill, Purley, CR8 2JB  
 Ward: Purley and Woodcote  
 Description: Demolition of existing dwelling and garage, erection of three storey building (with lower ground and roofspace accommodation) comprising 21 flats (7 x 1 beds, 12 x 2 beds and 2 x 3 beds) with associated parking, amenity space and waste and cycle stores.  
 Drawing Nos: 19-138-P001 (Received 04/08/2020), 19-138-P002 (Received 04/08/2020), 19-138-P003 (Received 04/08/2020), 19-138-P004 (Received 04/08/2020), 19-138-P005 (Received 04/08/2020), 19-138-P001 Rev A (Received 04/08/2020), 19-138-P010 Rev D (Received 07/01/2021), 19-138-P013 Rev C (Received 07/01/2021), 19-138-P014 Rev C (Received 07/01/2021), 19-138-P015 Rev C (Received 07/01/2021), 19-138-P016 Rev C (Received 07/01/2021), 19-138-P017 Rev C (Received 07/01/2021), 19-138-P018 Rev C (Received 07/01/2021), 19-138-P019 Rev C (Received 07/01/2021), 19-138-P020 Rev C (Received 07/01/2021), 19-138-P021 Rev C (Received 07/01/2021), 19-138-P022 Rev C (Received 07/01/2021), 19-138-P023 Rev C (Received 07/01/2021), 19-138-P024 Rev C (Received 07/01/2021), 19-138-P025 (Received 07/01/2021), 19-138-P025 Rev A (Received 07/01/2021), 19-138-P030 Rev C (Received 07/01/2021), 19-138-P031 Rev B (Received 07/01/2021), 19-138-P032 Rev B (Received 07/01/2021), 19-138-P033 Rev B (Received 07/01/2021), 19-138-P034 Rev C (Received 07/01/2021), 19-138-P035 Rev D (Received 25/01/2021), 19-138-P036 Rev C (Received 07/01/2021).  
 Agent: Mr David Ciccone  
 Applicant: Mr Dilip Shah  
 Case Officer: Paul Young

	studio	1 bed	2 bed	3 bed	4 bed (+)
<b>Existing</b>	0	0	0	1	0
<b>Proposed</b>	0	7	12	2	0

*4 of the units are proposed as affordable housing (both 3 bedroom units and 2 x 2 bedroom units)*

Number of car parking spaces	Number of cycle parking spaces
14	40

1.1 This application is being reported to committee owing to the receipt of objection letters in excess of the threshold set out in the Croydon Constitution.

## 2.0 RECOMMENDATION

2.1 That the Planning Committee resolve to GRANT planning permission subject to a S106 agreement with the following heads of terms:

- Clauses securing the Affordable Housing Offer
- Clauses precluding future residents from obtaining parking permits (in case of implementation of future Controlled Parking Zone)
- Clauses securing a Local Employment and Training Strategy and Training Contribution (around £16, 000)
- Financial Contributions for Carbon Offsetting (around £24,000)
- Financial Contributions towards Air Pollution Mitigation (around £2,100)
- Financial Contributions towards Sustainable Transport (around £31,000)

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

### CONDITIONS

- 1) Commencement 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) Material specifications/samples of external materials to be submitted
- 4) Compliance with hard and soft landscaping plan including boundary treatments
- 5) Tree Protection measures to be implemented for retained trees
- 6) Additional details/specifications of playspace equipment/area.
- 7) No additional windows in any flank elevations above ground floor without consent.
- 8) All inserted flank windows above street level to be obscure glazed and non-opening
- 9) Details of privacy screening for proposed balconies/terraces
- 10) Access Road, ramp and car parking/manoeuvring area to be provided as shown and to be used solely in conjunction with the approved development.
- 11) Visibility splays to be provided/retained
- 12) Submission of further details of electric vehicle charging points
- 13) Submission of Construction Logistics Plan
- 14) Compliance with Flood Risk Assessment and SUDS strategy.
- 15) Implementation of waste/recycling areas prior to occupation of units
- 16) Implementation of cycle parking/storage areas prior to occupation of units
- 17) All units to meet M(4)2 requirements and 10% (2 units) to meet M(4)3 standards.
- 18) Compliance with measures set out in submitted ecological report
- 19) Compliance with CO2 reduction targets and water efficiency standards
- 20) Any other planning condition(s) considered necessary by the Director of Planning and Strategic Transport

## INFORMATIVES

- 1) Community Infrastructure Levy
- 2) Highway/Crossover Works
- 3) Compliance with Building/Fire Regulations
- 4) Any other informative(s) considered necessary by the Director of Planning and Strategic Transport

### **3.0 PROPOSAL AND LOCATION DETAILS**

#### **Proposal**

3.1 The applicant seeks full planning permission for the following:

- Demolition of the existing 2/2.5 storey dwellinghouse and garage.
- Erection of a 3 storey building with roofspace accommodation and excavation to provide two levels of lower ground/basement accommodation (for a total of 6 floors of residential accommodation). The proposed building would provide a total of 21 flats (2 x 3 beds, 12 x 2 beds and 7 x 1 beds) complete with balcony/terraced areas and/or private gardens and communal amenity space/playspace.
- Excavation of the site to provide a ramp down into an undercroft car parking area providing 14 parking spaces.
- Provision of new boundary treatments, privacy screens, waste and cycle facilities, pathways and other hard and soft landscaping.

3.2 Note: the original proposal was for 23 flats with three levels of lower ground/basement accommodation, the lowest floor was removed and some minor changes to the elevations were made in a set of amended plans received in early 2021 and which are under assessment here.

3.3 A proposed site plan of the proposed development is shown below:



## Site and Surroundings

- 3.4 This application concerns an area of land (approximately 0.15 ha in area) which lies on the southern side of Russell Hill and currently houses a 2 storey detached dwelling with roofspace accommodation with an associated garage building front and rear gardens.
- 3.5 Land levels fall steeply from north to south and more gently from east to west. There is an existing vehicular crossover to the front of the property. Russell Hill and the surrounds are suburban areas which are generally made up of large traditional style detached dwellings, along with a number of flatted developments of differing form and design, including at the neighbouring site (3 Russell Hill). More Close to the rear was traditionally made up of detached properties of modest scale and height, although a number of recent planning consents for flatted developments have been approved (see planning history section), although most of these have not yet been implemented.
- 3.6 The site is bordered by No. 3 and No.7 Russell Hill to the east and west respectively, and No.7 More Close to the south. The site falls within PTAL 3 and outside areas at significant risk of flooding.

3.7 A recent aerial photo of the site is shown below:



### Planning History

3.8 The planning histories of this site and those in the vicinity are set out under the table below:

Application Site	Description	Decision	Date
20/00582/PRE	Demolition of existing single dwellinghouse, construction of a part-five and part-seven storey building, including three subterranean levels and roof accommodation, comprising 23 flats, basement vehicle parking, soft and hard landscaping, refuse and cycle stores.	Advice Issued	20/05/2020
18/05156/FUL	Demolition of existing building. Erection of four/five storey building comprising 19 flats (11 x three bedroom, 4 x two bedroom and 4 x one bedroom units) with associated parking, amenity space, cycle and refuse storage.	Permission Refused	21/03/2019
<b>Relevant nearby sites</b>			
1 More Close 19/04564/FUL	Demolition of existing two storey detached house and erection	Permission Granted	11.11.2020

	of a three storey building to provide 9 units, with associated vehicular accesses, car parking, child playspace and soft and hard landscaping as well as cycle and refuse storage.		
2 More Close 18/03342/FUL	Demolition of existing property, erection on three/four storey building comprising 9 flats (2c three-bedrooms, 5 x twobedrooms and 2 x 1-bedroom flats) including balconies with new access, parking area , refuse and cycle storage.	Permission Granted	06.03.2019
3 More Close 18/06093/FUL	Demolition of existing property, erection of three/four storey building comprising 9 flats including balconies with parking area, landscaping, child play spaces, refuse and cycle storage	Permission Granted	02.05.2019
4 More Close 19/04478/FUL	Construction of a part-three-/ part-four-storey building to accommodate nine flats (3 x 1-bed, 4x 2-bed, and 2 x 3-bed), a new vehicular access and four parking spaces, associated refuse and cycle stores along with hard and soft landscaping; following the demolition of existing dwellinghouse.	Resolution to Grant (subject to S106)	27.11.2020
6 More Close 19/05032/FUL	Construction of two interlinked blocks to accommodate 9 flats with associated car parking spaces, refuse store and cycle store facilities; following demolition of existing dwellinghouse.	Withdrawn	24.09.2020
Purley Baptist Church And Hall, Banstead Road, 1-4 Russell Hill Parade,1 Russell Hill Road And, 2- 12 Brighton Road And 1-9 Banstead Road Purley CR8 16/02994/P	Demolition of existing buildings on two sites; erection of 3 to17 storey building with basements comprising 114 flats, community and church space and a retail unit on Island Site and a 3 to 8 storey building comprising 106 flats on south site and public realm improvements with associated vehicular accesses	Permission Granted	15.12.2016

1A Russell Hill 18/05423/FUL	Erection of detached three bedroom dwelling to rear fronting More Close	Permission Granted	21.12.2018
3 Russell Hill 18/04264/FUL	Demolition of existing buildings; Erection of 2 x three/four storey buildings comprising 8 x one bedroom, 16 x two bedroom and 4 x three bedroom flats. Provision of vehicular accesses and provision of parking spaces, refuse and cycle storage and landscaping.	Permission Granted	15.02.2019
9 Russell Hill 14/03339/P	Demolition of the existing detached building; erection of a three storey building with accommodation in roofspace comprising 8 two bedroom flats with 8 associated car parking spaces	Permission Granted	04.06.2015
20-22 Russell Hill 12/03156/P	Demolition of existing buildings; erection of two storey building with accommodation in roofspace comprising 14 one bedroom flats to provide short term accommodation for semi independent living for people leaving residential care; formation of vehicular access and provision of associated parking	Permission Granted	28.01.2013
29-35 Russell Hill 19/03604/FUL	Demolition of existing residential dwellings and erection of 2 buildings, comprising of 106 new apartments, with associated hard and soft landscaping, access and car parking.	Permission Granted	14.02.2020
37 Russell Hill 19/00467/FUL	Demolition of the existing building and erection of a building ranging from 2 - 8 storeys, with basement, to accommodate 47 residential units; formation of associated access, landscaping, parking, refuse and cycle storage.	Permission Granted	20.12.2019

3.9 Application 18/05156/FUL on the application site was refused for a number of reasons, including:

- Harm to the character and appearance of the site and surrounding area due to bulk, scale and design
- Loss of privacy, visual intrusion and overbearing impact on number 7 More Close

- Insufficient information on flood risk and mitigation
  - Failure to contribute to addressing London's and the borough's need for affordable homes.
  - Insufficient Family units
  - Poor quality accommodation.
  - Insufficient car parking/Increase in parking pressures
- 3.10 As indicated in the above table, there have been a number of planning consents for residential redevelopments/intensification schemes in close proximity to the application site, the cumulative impacts of which will be considered in the assessment of this application.

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

- The principle of the development is acceptable given the residential character of the surrounding area.
- The design and appearance of the development is of a suitably high quality, and would not harm the character of the surrounding area.
- Subject to conditions, the living conditions of adjoining occupiers would be protected from undue harm.
- The quality of accommodation is acceptable/encouraged and living standards of future occupiers would comply with National, Regional and Local standards.
- A satisfactory mix of accommodation and level of affordable housing is proposed to create a mixed and balanced community within the development
- Subject to the suggested conditions, the proposed vehicular and pedestrian access/layout and level of parking is acceptable and would not unduly harm highway safety
- Subject to compliance with a tree protection plan and a suitable landscaping scheme (secured via conditions), no harm would result to visual amenity or biodiversity.
- Subject to conditions, suitable sustainable energy, water and drainage measures can be secured.

#### **5.0 CONSULTATIONS**

- 5.1 The views of the Planning Service are expressed in the MATERIAL PLANNING CONSIDERATIONS section below.
- 5.2 Historic England (GLAAS): no objections
- 5.3 Place Services (Ecology): No objections subject to the mitigation measures set out in the revised ecological appraisal
- 5.4 Lead Local Flood Authority: No objections subject to the mitigation measures set out in the FRA.



## 6.0 LOCAL REPRESENTATION

- 6.1 Neighbour notification: A site notice has been displayed and a press notice issued. 24 written objections have been received in response. Following the receipt of amended plans (see proposal section), a new site notice was erected and neighbouring properties were (re)notified of these amendments by letter. In response, an additional 6 written objections were received.
- 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:

(Planning Related) <b>Objection</b>	<b>Officer comment</b>
<i>Design and appearance</i>	
Overdevelopment of the site	Addressed in Paragraphs 8.4 – 8.18 of this report.
Out of character/harmful to the area due to its bulk/siting and design	Addressed in Paragraphs 8.7-8.18 of this report.
<i>Impact on amenities of neighbouring properties</i>	
Loss of light, outlook and privacy to neighbouring properties	Addressed in Paragraphs 8.34-8.40 of this report
Extra pollution and noise	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>Landscape/Trees</i>	
Loss/Harm of trees, vegetation and natural habitat	Addressed in paragraphs 8.57-8.62 of this report.
<i>Transport and parking</i>	
Insufficient parking provision	Addressed in paragraphs 8.41-8.49 of this report
Adverse impact on highway safety	Addressed in paragraphs 8.41-8.49 of this report.

<i>Other matters</i>	
Strain on public services/infrastructure	If granted permission and implemented, the development would be liable for CIL payments and the units would generate Council Tax payments which could fund infrastructure/services.
Increase in Flood Risk	Addressed in paragraph 8.50-8.56 of this report
Disruption during Construction	A Construction management plan will be secured via planning condition

6.3 Note that a number of non-planning related concerns (eg impact on utilities, setting a precedent, loss of property value etc) have also been raised.

6.4 Purley & Woodcote Residents Association: Councillor Oviri has objected to the application on the following (summarised) planning related grounds:

- Loss of family accommodation
- Overdevelopment
- Cumulative Impact.
- Detrimental to the amenity of occupiers of adjoining properties (noise, privacy, visual intrusion)
- Inadequate parking resulting in on street parking and additional traffic stress
- Poor Design/Out of character

6.5 Councillor Oviri has objected to the application on the following planning related grounds:

- Overdevelopment
- Cumulative Impact.
- Detrimental to the amenity of occupiers of adjoining properties (particularly overlooking)
- Inadequate parking resulting in on street parking and additional traffic stress
- Out of character

## **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 (CLP) 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.

7.3 The main planning Policies relevant in the assessment of this application are:

Consolidated London Plan 2016 (LP):

- 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
- 3.14 Existing Housing
- 5.1 Climate change mitigation
- 5.2 Minimising carbon dioxide emissions
- 5.3 Sustainable design and construction
- 5.7 Renewable energy
- 5.10 Urban greening
- 5.12 Flood risk management
- 5.13 Sustainable drainage
- 5.18 Construction, Demolition and excavation waste
- 6.3 Effects of development on transport capacity
- 6.9 Cycling
- 6.10 Walking
- 6.11 Smoothing traffic flow and tackling congestion
- 6.12 Road Network Capacity
- 6.13 Parking
- 7.4 Local Character
- 7.6 Architecture
- 8.13 Community Infrastructure Levy

Croydon Local Plan 2018 (CLP):

- 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
- 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

#### Supplementary Planning Documents/Guidance

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

#### Emerging London Plan

- 7.4 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.
- 7.5 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.
- 7.6 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.
- 7.7 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 relevant in the assessment of this application are as follows:

- Principle of development
- Townscape and visual impact
- Mix and quality of proposed accommodation
- Impact on amenities of surrounding residents
- Access, Parking and Highway Safety
- Sustainability and Flood Risk
- Biodiversity, Trees and Ecology
- Waste/Recycling Facilities

### **Principle of Development**

8.2 Paragraph 59 of the 2018 National Planning Policy Framework (NPPF) states that *“to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.”*

8.3 Similarly, the London Plan and Croydon Local Plan identify appropriate use of land as a material consideration to ensure that opportunities for development are recognised and housing supply optimised. It is acknowledged that windfall schemes which provide sensitive renewal and intensification of existing residential areas play an important role in meeting overall demand and thus helping to address overcrowding and affordability issues.

8.4 In relation to density, Policy 3.4 of the London Plan indicates that in suburban areas with PTALs of 2-3, an appropriate density equates to 150-250 habitable rooms per hectare (hr/ha).

8.5 The proposed development would provide 58 habitable rooms, which equates to a density of around 386 hr/ha. However, it is noted that in the subtext of Policy 3.4 it states that a rigorous appreciation of housing density is crucial to realising the optimum potential of sites, but it is only the start of planning housing development, not the end. It is not appropriate to apply it mechanistically. Officers consider that the site is located on the edge of a thriving District Centre which provides a range of services and is an appropriate location for the proposed scheme.

- 8.6 Given the site is within an established residential area, the principle of proposing residential development on the site is therefore considered acceptable (and is indeed encouraged) by adopted planning policies and guidance.

### **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 'in principle' objection to its demolition.
- 8.8 Policy SP4.1 of the 2018 Local Plan states that the Council will require development of a high quality, which respects and enhances Croydon's varied local character and contributes positively to public realm, landscape and townscape to create sustainable communities
- 8.9 Similarly, Policy DM10.1 of the 2018 Local Plan states that proposals should be of high quality and, whilst seeking to achieve a minimum height of 3 storeys, should respect:
- a. The development pattern, layout and siting;
  - b. The scale, height, massing, and density;
  - c. The appearance, existing materials and built and natural features of the surrounding area; the Place of Croydon in which it is located.
- 8.10 The Council's Supplementary Planning Document titled Suburban Residential Development (2019) sets out more detailed guidance on how to (best) meet the requirements of Policies SP4.1 and DM10.1.
- 8.11 In relation to bulk and scale, Policy 2.10 of the SPD (height of developments facing onto the street) sets out guidance in terms of massing for new developments. It states 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.

- 8.12 The proposed development would generally be in compliance with this. Whilst this would result in a built development of greater height than its neighbours, the

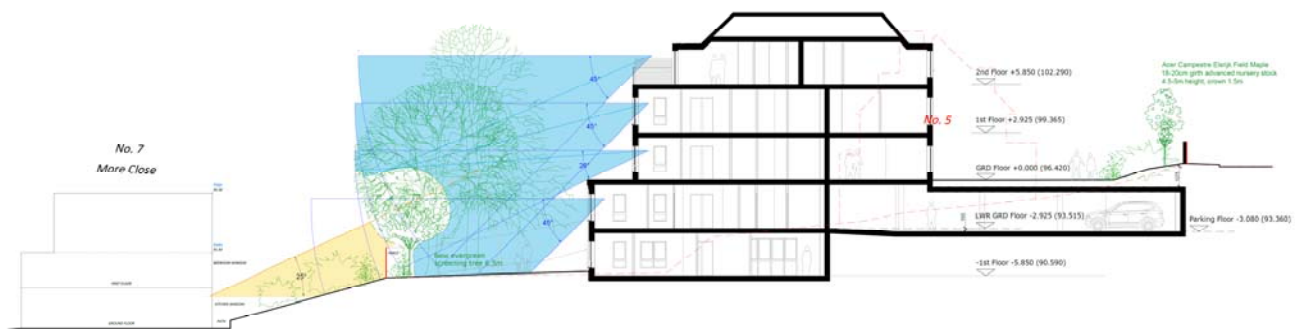
main bulk/height of the development (the 3 storey plus element) would be set at least 6m away from its neighbours on either side (numbers 3 and 7) and set back at least 10m from the boundary with the street. These distances/setbacks, combined with the fall in land levels, would ensure that the development, whilst appearing larger than the existing and its neighbours, would not dominate the streetscene to a significant or an unacceptable degree. Computer generated images (CGIs) of the proposed development from the front of the development is shown below:



8.13 It is noted that additional excavation is also proposed to the front of the building to form the underground car parking area (below a landscaped deck) and to the rear of the building to provide additional accommodation. Paragraph 2.20 of the SPD states that Croydon's topography presents many opportunities for new development in semi submerged lower floors with level access on one side of a property. It goes on to state that basements, lower-ground floor development and massing that steps down a slope that do not require the introduction of light wells will generally be acceptable provided that any habitable rooms have sufficient

access to natural light (see section on quality of accommodation later in the report).

8.14 The site slopes sharply to the South, and the proposed development utilises the topography of the land in order to provide two additional 'floors' of accommodation through excavation down and along the existing slope. Owing to this, no light wells would be required in order to provide natural light into primary windows serving habitable rooms. A BRE lighting assessment has been submitted which assesses the light into these lower level habitable rooms (more details in the quality of accommodation section of the report). A sectional plan of the proposed development is shown below to highlight this. Note: this shows the maximum/greatest extent/depth of lower ground floor works.



8.15 This proposed lower ground massing would not be apparent or visible from the streetscene. Similarly, in order to shield neighbouring properties from this massing, detailed planting schemes have been provided which adds additional evergreen trees along the shared boundary with number 7 More Close (which lies opposite). This relationship is demonstrated to a certain degree in the above section. Additionally, a photograph is shown below of the existing relationship, followed by a CGI of the rear part of the proposed development as well as part of the proposed planting scheme detailing the proposed planting to the rear.

Photograph of the existing situation





CGI of the rear of the proposed development



Part of the proposed Planting scheme



8.16 In terms of design, the proposed development presents traditional features (such as dual pitched gable ended forms) with an architectural rationale which responds in a contemporary way to the existing context. In terms of materials, the applicant has demonstrated how the proposed white painted brick and multi-red brick responds to the findings of the local materiality's study.

8.17 In general, the proposed design is considered to be of a good quality and in compliance with adopted policies and guidance, although further details on the material specifications will be secured via condition to ensure that they are of a suitably high quality.

8.18 Consideration has been given to the cumulative impact of development on the character of the area (as required by policy DM10). As noted above, the scheme is considered to be well designed and to sit appropriately with the massing of surrounding buildings and in accordance with the SDG as it reads from the street

as a three storey (plus roof accommodation) building well separated to the sides of the site. Other developments in the area have also been found to be acceptable and so their cumulative impact on character is acceptable.

- 8.19 Given the assessment above, and subject to the attached conditions, the application is not considered to harm the character or appearance of the site or the surrounding area.

### **Affordable Housing**

Policy SP2.4 of the Local Plan states that to deliver affordable housing in the borough, on sites of ten or more dwellings the Council will negotiate to achieve up to 50% affordable housing subject to viability and achieve a 60:40 tenure split of affordable or social rent to intermediate products whilst achieving 30% on site affordable housing or, if this is not viable, a minimum of 15% plus a Review Mechanism.

- 8.20 The applicant has submitted a financial viability assessment on the site which has been independently checked (and found to be sound). This indicates that, assuming a (standard) 17.5% profit margin, the provision of any affordable housing is not financially viable for the development.
- 8.21 Notwithstanding this, the applicant has agreed heads of terms with an affordable housing provider to purchase 4 of the units (both 3 bedroom units and two of the 2 bedroom units). This would mean that 24% of the total number of proposed habitable rooms would be affordable, which is slightly below the 30% target. The two 3 bedroom units are being offered as London affordable rent (57%) and the two x 2 bedroom units being offered as shared ownership (43%), which is broadly in line with the 60:40 ratio sought in Policy SP2.4.
- 8.22 This is assessed to be better than the scheme can support based on the analysis of the financial appraisal, which is considered sound and so is acceptable, subject to a review mechanism as set out within Policy SP2.5 (secured via the S106). As such, the requirements of Policy SP2.4 have been met.
- 8.23 In summary, whilst affordable housing has been demonstrated to be 'unviable', it is still proposed to be provided in broad compliance with Policy requirements. This adds some additional weight in favour of the proposed development.

### **Mix, Quality and Accessibility of Accommodation Provided**

- 8.24 Policy DM1.2 sets out that for schemes of 10 or more units, and in suburban areas with PTALs of 0-3, 70% of the proposed units should be 3 or more bedrooms. It does however go on to state that within three years of the adoption of this plan, where a viability assessment demonstrates that larger homes would not be viable, an element may be substituted by two bedroom, four person homes

complying with the floor space specification of national Technical Standards or the London Mayor’s Housing Supplementary Planning Guidance or equivalent.

- 8.25 The applicant has submitted a financial viability assessment on the site which has been independently checked (and found to be sound). This indicates that the development (and the provision of additional 3 bedroom units) is not financially viable.
- 8.26 Two 3 bedroom units are proposed along with twelve 2 bedroom 4 person units, together totalling 66.6% of the development. However, it is noted that the site lies very close to (within 55m) of the boundary with PTAL level 4 (good), which would require a lower provision of 60% under Policy DM1.2. As such, the proposed mix (at 66.6%) is considered acceptable in this instance.
- 8.27 In relation to the quality of the accommodation provided, Policy 3.5 of the 2016 London Plan states that housing developments should be of the highest quality, internally, externally and in relation to their context and to the wider environment. It indicates that the design of all new housing should enhance the quality of local places, taking into account physical context and local character. Policy 3.5 sets out minimum GIA standards for new residential developments.
- 8.28 In addition to the above, Policy DM10.4 of Croydon’s local plan states that all proposals for new residential development will need to provide private amenity space that is high quality, measures 5m<sup>2</sup> per 1-2bedroom unit and an additional 1m<sup>2</sup> per extra occupant after that. Communal space and children’s playspace should also be provided in accordance with the standards in policy.
- 8.29 These standards are set out within table 6.2 within Policy DM10.4. A breakdown of the development in relation to Gross Internal Area (GIA’s) and Amenity space requirements and provisions of the development are set out in the following table:

Unit No.	Unit Type	GIA		Private Amenity (PA)	
		Required (m <sup>2</sup> )	Provided (m <sup>2</sup> )	Required (m <sup>2</sup> )	Provided (m <sup>2</sup> )
1	3b5p	86	91	8	8.5
2	3b5p	86	92	8	7.5
3	2b4p	70	75	7	8.5
4	2b4p	70	83	7	6.5
5	2b4p	70	75	7	7
6	2b4p	70	82	7	8.5

7	1b2p	50	51	5	8.4
8	2b4p	70	82	7	7
9	1b2p	50	50	5	5.1
10	2b4p	70	70	7	8.5
11	2b4p	70	81	7	8.2
12	2b4p	70	76	7	9
13	1b2p	50	51	5	7
14	1b2p	50	51	5	5.1
15	1b2p	50	54	5	8.7
16	2b4p	70	74	7	8.2
17	2b4p	70	76	7	9
18	1b2p	50	51	5	7
19	1b2p	50	51	5	5.1
20	2b4p	70	81	7	7.4
21	2b4p	70	77	7	7.1

8.30 The proposed development would generally meet/exceed the standards. Two of the units would be below private amenity standards by a very small degree (0.5m<sup>2</sup>), but given that the GIA of the units would be at least 6m<sup>2</sup> above the London Plan requirements, the overall standard of accommodation would be satisfactory. It is noted that in the subtext of Policy DM10.4 it indicates that where there is a shortfall in Private amenity space provision, this can be compensated for via an enlarged unit GIA.

8.31 Additionally, a communal area of around 270m<sup>2</sup> to the rear would also be provided (as well as an area to the front of the development), which would also provide adequate provision for childrens playspace. Policy DM10.4 would require a playspace area of 67.3m<sup>2</sup> be provided which can be comfortably accommodated/integrated into the amenity areas shown in the submitted site and landscape plans. Finerdetails of the playspace areas/equipment willbe secured via condition).

8.32 In terms of accessibility, London Plan Policy 3.8 requires 10% of new-build housing to be “wheelchair user dwellings” (Building Regulation M4(3)) and the remainder “accessible and adaptable” (Building Regulation M4(2)). To achieve these requirements, step free access is required which for flatted developments usually means providing a lift. Two of the proposed units (flats 4 and 8) are

proposed as wheelchair user dwellings to meet M4(3) and a lift is provided so the remaining units can meet M4(2), and so the requirements of this Policy are met.

- 8.33 Similarly, the units in the roofspace would have floor to ceiling heights within London Plan standards/tolerances. An internal daylight study has also been submitted which demonstrates that all the habitable rooms have an Average Daylight Factor (ADF) which exceeds British Research Establishment Guidelines the guidelines. As such, in general, the proposed accommodation is considered to be of a good standard, and no planning harm has been identified in this regard.

### Impacts on Neighbouring Residential Amenity

- 8.34 The nearest residential properties to the development are numbers 3 Russell Hill (which is split into 9 flats) and number 7 Russell Hill, with number 7 More Close lying to the South (opposite).
- 8.35 In terms of the rear building line, Suburban Design Guide SPD (2019) states that depth of the projection should be no greater than 45 degrees as measured from the middle window of the closest ground floor habitable room on the rear wall of the main neighbouring property on both side. The relevant extract from the Suburban Design Guide SPD (2019) which demonstrates this is shown below.



Figure 2.11b: Depth of projection no greater than 45 degrees as measured from the middle of the window of the closest ground floor habitable room on the rear wall of the main neighbouring property on both sides.

- 8.36 The submitted site plan (shown in the proposal section and shown at a greater scale below) demonstrates that the proposed development would not conflict with this guidance. Indeed, whilst the lower ground floors would extend the greatest distance to the rear (south), the upper floors of the development would extend to a lesser degree. Additionally, these upper floors would be set off the shared boundaries and at least 7m away from the properties either side. As a result, no material harm would result to their amenities in terms of loss of sunlight, daylight or outlook. (Part of) the proposed site plan is below:



8.37 In relation to overlooking, no clear glazed flank windows are proposed above the ground floor (street level), and privacy screens are proposed along the flanks of the raised balcony/terrace/roof inset areas to prevent direct overlooking of the gardens of both adjacent neighbours (17 and 21). Full details of these privacy screens will be secured via condition.

8.38 In relation to 7 More Close (opposite), it is noted that the distance between the rear of the development and this property would be at least 23m, which exceeds the 18m set out in the Council's SPD for Suburban Residential Development. Notwithstanding, it is acknowledged that this property is on notably lower ground and would result in a notable increase in habitable room windows which would face over the rear garden serving this property.

8.39 Partly owing to this, and as indicated previously in the report, a planting scheme has been sought (at application stage) which proposes the planting of evergreen trees along this shared boundary in order to mitigate overlooking of this garden area (and those either side), as well as reducing potential noise disturbance from the use of the lower ground shared communal amenity space/playspace to the rear of the site.

8.40 The proposed development would introduce additional activity and lighting in and around the site. However, this activity would be residential in nature, within a residential area, and adopted planning policies and guidance encourage intensification of residential use in principle (subject to a full planning assessment). It is noted that there are a number of recent consents on neighbouring sites which would also result in similar levels of intensification. As such, it is not considered to result in unacceptable harm in this regard.

### **Access, Parking and Highway Safety**

8.41 Policy SP8.15 of the Croydon Local Plan states that the Council will encourage car free development in Centres, where there are high levels of PTAL and when a critical mass of development enables viable alternatives, such as car clubs (while still providing for disabled people). Detailed car parking standards are contained within the Croydon Local Plan's Detailed Policies and Proposals.

8.42 The site has a Public Transport Accessibility Level (PTAL) of 3 (moderate). The 2016 London Plan requires a maximum of 1.5 spaces for 3 bedroom dwellings, and less than 1 space for 2 and 1 bed dwellings (which equates to a maximum of 22 spaces in total for the proposed development). However, within the London Plan (Policy 6.13 – Parking) it states that “all developments in areas of good public transport accessibility in all parts of London should aim for significantly less than 1 space per unit.” It is also indicated in the subtext of this policy that it is often not desirable to provide the maximum amount of parking that policy allows, so as to promote sustainable transport and minimise air pollution.

8.43 14 Car parking spaces would be provided, which suggests a ‘worst case’ overspill scenario of 8 vehicles.

8.44 However, 2011 Census data for Purley indicates that car ownership was 0.5 for 1 bedroom units, 0.8 for two bedroom units and 1.2 for three bedroom units. Factoring in the rise in car ownership (6% increase to 2018 from recent TFL data), it is calculated that the proposed development would have a likely car ownership of 16.3 vehicles. 14 Car parking spaces would be provided. This indicates that there would actually be a likely modest overspill of 2 to 3 vehicles onto the public highway. There would also be a likely loss of one on-street parking bay as a wider vehicular entrance and enlarged crossover would be required.

8.45 Paragraph 109 of the 2019 NPPF states that Development should only be prevented or refused on highways grounds if “*the residual cumulative impacts on the road network would be severe.*”

8.46 The applicant has submitted a parking stress survey using the Lambeth methodology. This counted 202 free parking spaces in the locality (within 200m). It also has taken into account the consents and live applications present at the



time of the survey (and highlighted in the Planning History section of the report), and has indicated that the shortfall between the parking provision of these consents/live applications and the maximum car parking standards set out in the London Plan would be 48 spaces. As such, the worst case scenario as set out in the report would still leave over 150 spaces. In reality, the number of free parking spaces that remain is likely to be notably higher because, as noted earlier, the Census data (updated in line with TFL data) indicates that the car ownership of 1, 2 and 3 bedroom units in Purley is lower than the 'maximum' London Plan standards.

- 8.47 As such, it is considered that any limited overspill resulting from the development could easily be accommodated on street. The development would not therefore increase parking pressures to a 'severe' level and as such, no conflicts with paragraph 109 would arise.
- 8.48 In terms of access and the proposed ramp, the applicant has provided a level and wide waiting area at the top of the proposed ramp which would be controlled via an electronic barrier, and have modelled the vehicular pathway into the underground area to demonstrate that there is no risk of any vehicle 'grounding' when using the ramp.
- 8.49 In relation of cycle parking, London Plan standards would require 35 secure and covered cycle parking spaces. The development would provide 40 spaces in two cycle storage facilities (in excess of these standards). One of these stores (the main store) would be integrated within the building's envelope in the ground floor, with a second store located in a modest single storey building located to the front of the building, and the Applicant has demonstrated how this would be integrated within the landscape strategy and successfully screened by soft planting. The design of these storage spaces is therefore acceptable and in line with supported as per policy DM10.2 in the CLP and SPD2 Guidance.

### **Sustainability and Flood Risk**

- 8.50 In line with Policy 5.2 of the London Plan, the development proposals should make the fullest contribution to minimising carbon dioxide emissions. Policy document SP6 (Environment and Climate Change) will seek high standards of sustainable design and construction for new development, conversions and refurbishment to assist in meeting local and national CO<sub>2</sub> reduction targets. The use of sustainable modes of construction and materials would ensure that the development meets this policy requirement.
- 8.51 Policy 5.2 of the London Plan sets out that major developments should be zero carbon. It indicates that if the developer is unable to achieve zero carbon, a minimum 35% beyond 2013 building regulations will be required on site, with the shortfall provided as a commuted sum towards off-site carbon reduction projects. The commuted sum is calculated on the basis of £60 per tonne of CO<sub>2</sub> over a

30 year period, with 50% of the sum to be provided on commencement and 50% on occupation.

- 8.52 The submitted energy report indicates that the development can meet the minimum target of 35% beyond 2013 building regulations on site but would not/cannot reach zero carbon standards. However, the applicant has agreed to pay a commuted sum towards any shortfall which would be secured via a S106 agreement. As such, subject to this, no conflict with Policy 5.2 would arise
- 8.53 The scheme needs to be designed and built so mains water consumption would meet a target of 110 litres or less per head per day, as set out in the 2013 Building Regulations (Part G), which can be secured via condition.
- 8.54 The site is partly located within an area with a high risk of surface water flooding. Policy DM25 of the Croydon Local Plan requires all development to incorporate sustainable drainage measures (SuDS).
- 8.55 The Lead Local Authority has assessed the submitted (revised) flood risk assessment, and consider this to be acceptable.
- 8.56 A condition requiring additional site specific SuDS measures (eg rainwater collection/recycling, green roofs/walls etc) is also recommended. Subject to compliance with this and revised flood risk assessment, as well as compliance with the submitted landscaping scheme (all secured via condition), it is considered that there would be no material increase in flood risk and no conflict with adopted Policy.

### **Ecology, Biodiversity and Trees**

- 8.57 In terms of ecology, the applicant has submitted ecological report with the application. This sets out a number of recommendations, as well as a number of biodiversity enhancement measures, such as the installation of bat and bird nesting boxes to the existing mature trees.
- 8.58 The Council's ecological consultant has reviewed the submitted report and has deemed it satisfactory subject to the outlined mitigation measures (secured via condition).
- 8.59 There are no trees protected by Tree Preservation Orders on the site. Notwithstanding, the submitted tree survey indicates that the proposed development would result in the loss of a total of 21 trees. 19 of these would be category C, one would be category U, and one would be category B. In terms of species, the vast majority of the trees lost would be common Lime Trees, most of which are located along the front boundary.

- 8.60 The proposed site plan suggests that 5 smaller (Category C) and 10 larger (Category B) trees are proposed to replace those that are lost (which would be a shortfall of 6 trees).
- 8.61 Some of this loss would be mitigated through the implementation of the replanting schemes submitted by the application. However, it is acknowledged that this replacement vegetation would generally be of a 'lower' level, with shrubs/hedging being added in lieu of the more 'substantive' lost trees. Consideration has been given to providing more trees on the site, but it is considered preferable to have trees well located in appropriate areas of soil which will stand a good chance of success than providing more trees in inappropriate locations. Additionally, when assessing this element of the proposal, it needs to be remembered that none of the trees are protected and all could be felled without needing permission from the Council.
- 8.62 As such, in conclusion, whilst the ecological measures would aid biodiversity to a limited degree, a minor conflict with Policy DM10.8 is noted (which seeks to retain existing trees and vegetation that contribute to the setting and local character of an area and secure suitable replacements where retention is not possible). As such some minor harm is attributed to the development in this regard.

### **Waste/Recycling Facilities**

- 8.63 The guidance set out in the Council's Suburban Design Guide (2019) advises that waste storage areas should be within 30m of the entrance of each residential units and within 20m of the public highway.
- 8.64 The proposed development would comply with these guidelines. Refuse storage would be integrated within the building envelope, in an easily accessible location from the street and for residents, integrated with the bulky waste space, and would not present visual nor spatial dominance towards the entrance. It is therefore supported in line with CLP policy DM13.1.
- 8.65 The application proposes a secure and covered waste storage area within 15m of the public highway and around 10m from the main entrance and which is of a suitable size to accommodate the development in line with adopted policies and guidance. As such, no objections are raised.

### **Other matters**

8.66 Historic England have been notified and have deemed that no further archaeological measures are required in this case. All other planning related matters have been considered (including equalities) and no other planning harm has been identified.

### **Conclusion/Planning Balance**

8.67 The proposed development would provide 21 new residential units, of a satisfactory quality and mix. Four affordable units would also be provided despite said provision being demonstrated as being unviable. This adds a fair amount of weight in favour of the proposal. On the other side, the proposed development would result in the net loss of trees on the site, and would introduce some additional indirect overlooking of neighbouring gardens. However, it is considered that loss of these trees, as well as the indirect overlooking would be mitigated through the implementation of the replanting and ecological enhancement schemes submitted in the application. Overall, when weighing up the impacts of the development, any minor harm identified is considered to be outweighed by the benefits of the development in terms of housing provision (both market and affordable).

8.68 As such, subject to the recommended conditions and the satisfactory completion and signing of a S106 agreement, the development is considered acceptable and is therefore recommended for approval.