

1 APPLICATION DETAILS

Ref: 21/05373/FUL
 Location: 108 - 114 & 118 – 120 Pampisford Road, Purley
 Ward: Purley Oaks and Riddlesdown
 Description: The demolition of 6 no. detached dwelling houses and the construction of 5 buildings of up to 4 storeys in height (plus roof accommodation and basement), providing 67 new homes with landscaping, car parking provision, refuse storage and associated works.
 Drawing Nos: 20-161-P050, P051, P052, P053, P054D, P055B, P060D, P061C, P062C, P063C, P064C, P065C, P067, P068, P069A, P070D, P071D, P072D, P073D, P074D, P080C, P081C, P082C, P083C, P084A, P085C, P086B, P087A, P088C, P089C, P090B, P091A, P092B, P093A, P095B, P099, P103B, P105, P109A and P112.
 Applicant: DP (Pampisford) Ltd
 Agent: Alex Yearsley
 Case Officer: Thomas Wilson

Housing Mix					
	1 bed (2 person)	2 bed (3 person)	2 bed (4 person)	3 bed (4+ person)	TOTAL
Existing (to be demolished)	0	0	0	6	6
Proposed (market housing)	12	2	0	31	45
Proposed (affordable rent)	2	8	3	0	13
Proposed (shared ownership)	3	2	4	0	9
TOTAL	16	13	7	31	67

*All 45 market units would be within nos. 108 - 114 Pampisford Road and all 22 affordable units would be within nos. 118 - 120 Pampisford Road.

Vehicle and Cycle Parking (London Plan Standards)	
PTAL: 2 (however No. 108 is immediately adjacent to PTAL 4)	
Car Parking maximum standard	Proposed
Nos. 108 - 114 Pampisford Road = 41.5	43
Nos. 118 - 120 Pampisford Road = 16.5	22
Long Stay Cycle Storage minimum	Proposed
Nos. 108 - 114 Pampisford Road = 84	104
Nos. 118 - 120 Pampisford Road = 42	45
Short Stay Cycle Storage minimum	Proposed

Nos. 108 - 114 Pampisford Road = 3	6
Nos. 118 - 120 Pampisford Road = 2	2

1.1 This application is being reported to committee because:

- Objections above the threshold in the Committee Consideration Criteria have been received.

2 RECOMMENDATION

2.1 That the Committee resolve to GRANT planning permission

2.2 That the Director of Planning Sustainable Regeneration is delegated authority to issue the planning permission subject to:

A. The prior completion of a legal agreement to secure the following planning obligations:

- 28% Affordable housing by habitable room (13 X London Affordable Rent units and 9 x Shared Ownership homes)
- Affordable housing early and late-stage review mechanisms
- Completion of affordable housing prior to occupation of market housing.
- Sustainable transport measures and contribution of £100,500
- Exclude residents from being eligible to apply for parking permits to the CPZ in this area
- Free membership for future occupants to a car club for 3 years
- Carbon offset contribution
- Air quality contribution of £6,700
- Local employment and training (construction phase) contribution of c £55,000 plus Local Employment and Training Strategy
- S.278 agreement to secure highways works
- 'Be Seen' energy monitoring
- Monitoring fee(s)

Any other planning obligation(s) considered necessary by the Director of Planning and Strategic Transport

2.3 That the Director of Planning and Sustainable Regeneration is delegated authority to negotiate the legal agreement indicated above.

2.4 That the Director of Planning and Sustainable Regeneration is 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) Carried out in accordance with the approved drawings

Pre-commencement

- 3) Phasing plan
- 4) Construction and Environmental Management Plan

- 5) Contamination
- 6) Piling method statement
- 7) Further details of SuDS
- 8) Updated Fire Statement including provision of evacuation lift facilities
- 9) Site Levels
- 10) Tree protection
- 11) Details of suspended ramp over tree roots

Prior to above ground floor slab level

- 12) Details of materials
- 13) Detailed drawings
- 14) Details of boundary treatment
- 15) Details of landscaping, green roofs, child play / communal amenity space
- 16) Landscape contingency
- 17) Details of Biodiversity Enhancement Strategy
- 18) Details of external plant

Pre-occupation

- 19) Full details of cycle storage to be submitted for approval
- 20) Details of traffic lights, barrier and ramps
- 21) Car park management plan
- 22) EVCP to be implemented on site
- 23) Energy efficiency / sustainability
- 24) Waste Management Plan
- 25) Secured by design
- 26) Delivery and Servicing Plan
- 27) Screening to balconies/terraces

Compliance

- 28) Water use
- 29) Air Quality
- 30) Accessible Homes (M4(2) and (3))
- 31) Urban Greening
- 32) External Lighting
- 33) Construction waste strategy

Restriction

- 34) Ultra-low NOx boiler
- 35) No plumbing other than rainwater pipes on front elevation
- 36) No telecommunications equipment
- 37) Obscure glazing with restricted opening up to 1.7m above floor level
 - Nos.108-144
 - Block A: South west elevation Levels 1-4,
 - Block B: North east elevation Levels 1-4,
 - Block C: North west elevation Levels 1-2.
 - Nos.118-120
 - South west and north east elevations Levels 0-2

Any other planning condition(s) considered necessary by the Director of Planning and Sustainable Regeneration

Informatives

- 1) Granted subject to a Section 106 Agreement;
- 2) Community Infrastructure Levy;
- 3) Code of practice for Construction Sites;
- 4) Thames Water informatives regarding underground assets, public sewers. And water pressure.

Any other informative(s) considered necessary by the Director of Planning and Strategic Transport

- 2.5 That the Committee confirms that adequate provision has been made, by the imposition of conditions, for the preservation or planting of trees as required by Section 197 of the Town and Country Planning Act 1990.
- 2.6 That the Director of Planning and Sustainable Regeneration is delegated authority to negotiate the relevant ecological information, mitigation and planning conditions; and to refuse the application, if within 6 months of the planning committee meeting date the relevant ecological information is insufficient.
- 2.7 That the Director of Planning and Sustainable Regeneration is delegated authority to refuse planning permission if within 6 months of the planning committee meeting date the legal agreement has not been completed.

3 PROPOSAL AND LOCATION DETAILS

Proposal

- 3.1 Full planning permission is sought for the demolition of nos. 108 - 114 Pampisford Road (four dwellings, "Site 1") and nos. 118 - 120 Pampisford Road (two dwellings, "Site 2"). The two sites are separated by nos. 116 and 116a Pampisford Road. Combined the sites would provide 67 homes, 45 of which would be market homes located on Site 1 (nos. 108 - 114 Pampisford Road) and 22 (33% overall and 28% by habitable room) which would be affordable homes (13 x London Affordable Rent and 9 x Shared Ownership) located on Site 2 (nos. 118 - 120 Pampisford Road).
- 3.2 On nos. 108 - 114 Pampisford Road (Site 1), the proposal includes the erection of four blocks (A-D). Blocks A and B would face onto Pampisford Road with Blocks C and D positioned behind within the rear garden. Between the two blocks would be a communal garden. Vehicle access would be adjacent to no. 106 and would lead down to an underground car park.

Amendments

- 3.3 Following the initial submission and consultation exercise, amended drawings were received with the following changes:
 - Reduction in height of all blocks
 - Repositioning of all blocks
 - Reduction from 68 to 67 units
- 3.4 Neighbours were re-consulted on the amended drawings and the description of development has been updated.

Site and Surroundings

- 3.5 This site comprises of two separate plots, nos. 108-114 Pampisford Road (Site 1) and no. 118-120 Pampisford Road (Site 2) located on the south eastern side of the street. Nos. 108-114 comprises of four plots and nos. 118-120 two plots, all with single family dwellinghouses, substantial rear gardens and generous defensible space to the front.
- 3.6 There appears to be a relatively consistent building line that is also mirrored on the opposite side of the road. Each property has off street parking and a dropped kerb. The land slopes steeply downwards towards the south east, such that the buildings on this side of the road are substantially lower than those opposite. The surrounding area is predominately residential, suburban with a verdant character. The buildings vary in height and typology, with a 3-storey block of flats adjacent at no.122; 2 new residential buildings of 3 and 4 storeys on the corner of Wyvern Road, and 3 recently constructed 2 storey (plus roof accommodation) houses opposite at 75-75B Pampisford Road.
- 3.7 No. 108 is located within an area with potential for groundwater flooding of the property below ground level, with the remainder of the site having limited potential. Both sites are at very low risk from surface water and river flooding, but are within a critical drainage area. There are three trees close to the boundaries of nos. 108-110 Pampisford Road site that are subject to a TPO.



Site location Plan

Planning Designations and Constraints

3.8 The site is subject to the following formal planning constraints and designations:

- PTAL: Assumed 2 (However, no. 108 is immediately adjacent to PTAL 4)
- Flood Risk Zone: 1
- Surface water flooding: Very low risk
- Groundwater flooding: No. 108 = partially potential for flooding of the property below ground level, with the remainder of the site having limited potential
- Critical drainage area

Planning History

3.9 The following planning decisions are relevant to the application:

108 Pampisford Road

16/00179/P - Alterations; conversion to form 3 one bedroom and 3 two-bedroom flats; extension of pitched roof and erection of a 3-storey rear extension; erection of 4 underground stores at the front with car parking over with alterations to the existing vehicular access; erection of 2 lower ground floor stores at the rear.

Refused due to the impact on the appearance of the original building and streetscene, loss of privacy to neighbours, result in sub-standard accommodation and layout of the parking and turning area.

108 & 110 Pampisford Road Plus 1-3 Montpelier Road, Purley, CR8 2NF

02/02654/P - Demolition of existing houses; erection of 4 blocks comprising 8 three bedroom and 6 four-bedroom townhouses; formation of vehicular access onto Montpelier Road

Refused due to the impact on the appearance of the streetscene, loss of privacy to neighbours, result in sub-standard accommodation, and lack of visibility splays and layout of the parking and turning area.

112 Pampisford Road

20/04290/OUT - Outline planning permission for the demolition of existing two storey dwellinghouse (including side garage) and erection of a part three; part four storey (including excavation) building comprising 7 self-contained flats to the front and a two storey semi-detached pair of dwellings to the rear; reinstatement of existing crossover and creation of new crossover to facilitate forecourt car parking; cycle and refuse provision, hard and soft landscaping, boundary treatment; land level alterations; communal/private/play amenity space and external alterations (Access, Layout, Scale).

Refused due to the impact on the appearance of the streetscene, loss of daylight, sunlight and outlook to neighbours, result in sub-standard accommodation, and layout of the parking area, lack of parking and accuracy of parking survey.

21/03459/OUT - Outline planning permission for the demolition of existing two storey dwellinghouse (including side garage) and erection of a part three; part four storey

(including excavation) building comprising 5 self-contained flats to the front and 4 self-contained flats to the rear; reinstatement of existing crossover and creation of new crossover to facilitate forecourt car parking; cycle and refuse provision, hard and soft landscaping, boundary treatment; land level alterations; communal/private/play amenity space and external alterations (Access, Layout, Design, Scale); all other matters reserved (Landscape). (PENDING DECISION)

110 - 114 Pampisford Road

14/03383/P - Demolition of existing houses and the erection of a part 2 storey, part 3 storey building with accommodation within the roof space, and underground parking area. Providing 9 x 1 bedroom and 9 x 2-bedroom flats.

Refused due to the impact on the appearance of the streetscene, visual intrusion to neighbours, result in sub-standard accommodation and layout of the parking and turning area.

Appeal dismissed, all reasons for refusal upheld.

15/01667/P - Demolition of existing houses; erection of a 2/3 storey building with undercroft parking comprising 5 one bedroom, 4 two bedroom and 5 three-bedroom flats.

Refused due to the impact on the appearance of the streetscene, vehicle access and lack of drainage strategy.

Appeal dismissed due to the impact on the appearance of the streetscene.

122 Pampisford Road

18/00236/FUL - Demolition of existing two storey property, erection of two storey plus lower ground floor and roof level, creation of eight self-contained residential units (C3), new access with car parking, landscaping, refuse and cycle storage. (Permission granted 17 August 2018).

4 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The proposed development would provide 67 residential units of which 22 would be affordable.
- Some harm to the character of the area has been identified by the scale of proposal. However, the scale of buildings locally varies, and the architectural treatment of the buildings would reflect the local character. Officers do not consider the harm significant and that other material planning considerations (provision of additional housing of which 28% is affordable by habitable room) would outweigh that harm.
- Impacts to neighbours would be acceptable.
- The proposed units have an acceptable standard of accommodation.
The proposed development would be acceptable on highways, environmental, trees, SuDS and sustainability grounds as well as in respect of the proposed planning obligations.
- Further details are required in relation to potential impacts to badgers and bats.

- 4.1 The following sections of this report summarise the officer assessment and the reason for the recommendation.

5 CONSULTATION RESPONSE

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

- 5.2 The following were consulted regarding the application:

Lead Local Flood Authority (LLFA) (Statutory Consultee)

- 5.3 The submitted strategy and overall approach meet most of the LLFA requirements. However, the information submitted is not adequate to fully demonstrate the compliance. Clarifications and additional information are still required in some aspects of the strategy before this can be approved. An updated strategy should be secured by condition.

Thames Water (Statutory Consultee)

- 5.4 No objections subject to piling condition and informatives.

BPS Surveyors (Independent Viability Consultant):

- 5.5 The proposed affordable housing provision (13 x LAR and 9 X SO units) would generate a deficit and it would not be viable to provide more affordable housing.
- 5.6 Recommend the Council includes both an early and late-stage review mechanism within the Section 106 Agreement.

Tree Officer

- 5.7 108-114 Pampisford – Moderate number of trees proposed for removal, although trees offer little in terms of visual amenity. Replacement planting acceptable and should be secured by condition.
- 5.8 The proposed principle of using a suspended ramp in proximity to T10 is acceptable and should be secured by condition.
- 5.9 118-120 Pampisford - Considerable amount of tree, although generally of low quality. Replacement planting acceptable and should be secured by condition.

Principal Building Control Surveyor (fire safety)

- 5.10 No objection subject to a condition requiring additional details to be submitted.

Pollution Control Officer (air quality, noise and light)

- 5.11 No objection subject to conditions requiring submission of a Construction and Environmental Management Plan and delivery and servicing plan, compliance with the lighting strategies and restrictions on boiler types. Secure a contribution of £6,700 to off-set emissions.

Place Services (biodiversity/ecology)

- 5.12 All dwellings proposed to be demolished contain moderate to low potential for roosting bats and the submitted Bat Mitigation Statements still recommends that further bats emergence / re-entry survey are required to confirm the presence / likely absence of bats or the extent of the likely impacts European Protected Species. These are still scheduled for the bat activity season in 2023 and are still required prior to determination of this application.
- 5.13 In addition, we note that the Badger Mitigation Statement (December 2022) recommends that a camera trap survey should be carried out for 118-120 Pampisford Road, to confirm whether the site is occupied by Badger due to the presence of an unidentified mammal burrow.
- 5.14 However, support the mitigation measures contained within the Stag Beetle Mitigation Statement (December 2022), as well as the details contained within the Biodiversity Enhancement Plan (November 2022) in principle.
- 5.15 As a result, this additional information is still required to provide the LPA with certainty of impacts on legally protected species and be able to secure appropriate mitigation either by a mitigation licence from Natural England or a condition of any consent. This will enable the LPA to demonstrate compliance with its statutory duties, including its biodiversity duty under s40 NERC Act 2006 and prevent wildlife crime under s17 Crime and Disorder Act 1998.

STM Environmental (contamination)

- 5.16 No objection subject to a condition requiring additional details to be submitted.

6 LOCAL REPRESENTATION

- 6.1 A total of 71 neighbouring properties were notified about the application and invited to comment. The application has been publicised by way of one or more site notices displayed in the vicinity of the application site. The application has also been publicised in the local press. The number of representations received from neighbours, local groups etc in response to notification and publicity of the application were as follows:

No of individual responses: 20 Objecting: 18 Supporting: 2

- 6.2 The following local groups/societies made representations:

Purley & Woodcote Residents Association

- 6.3 Objects to this proposal on the following grounds:

- Loss of a family home, whilst the proposed development would not contribute to providing family accommodation.
- Overdevelopment: Significant increase in the built area and inadequate amenity space for potential occupiers.
- The design is out of keeping with the locality and surrounding townscape, as a result of its massing, form, and overall development layout and appearance.
- Detrimental to the amenity of occupiers of adjoining properties: Neighbouring properties will suffer visual intrusion, increased noise and, loss of privacy.

- Inadequate car parking: Additional on street parking and parking pressure, and increased traffic movements endangering road safety contrary.

The MP Chris Philp made the following representations:

- Significant overdevelopment of site: Design, size, height, footprint, scale and mass.
- Detrimental to the streetscene due to its modern interpretive design and scale.
- Fails to respect the local development pattern, dominates the plot; neighbouring properties are generously spaced and respect the trees and green character of the area.
- Fails to respect the prevailing pattern and qualities of the area: cramped, harmful to local character and fails to integrate well into the local context.
- Detrimental to amenities neighbouring properties by reason of its mass, overbearing nature, design and siting resulting in increased visual intrusion and loss of privacy.
- Insufficient parking for residents and visitors.
- Loss of biodiversity, nature and trees.
- Inadequate infrastructure e.g., schools, health care facilities, drainage.

6.4 The following issues were raised in representations that are material to the determination of the application, and they are addressed in substance in the next section of this report:

Objection	Officer comment
Character and design	
Overdevelopment/ inappropriate layout and density.	These are addressed within the <i>Design and impact on character of the area</i> section of the report. Officers consider that the design is of a good quality and the development reflects the emerging character of Pampisford Road.
Design and scale are out-of-keeping. Harm to character and appearance of the surrounding area.	
Design is unattractive.	
Neighbouring amenity	
Loss of daylight and overshadowing to properties on Montpelier Road, Pampisford Road, The Close and St Denys Close.	These are addressed within the <i>Impact on neighbouring residential amenity</i> section of the report. Impacts upon daylight, sunlight and overshadowing were found to be acceptable. Whilst there would be some losses of outlook, they were not considered sufficiently harmful to justify refusal. Losses of privacy were considered to be within acceptable parameters. Noise and disturbance were not considered to be harmful.
Loss of outlook. Visually dominant.	
Loss of privacy to properties on Montpelier Road, Pampisford Road, The Close and St Denys Close.	
Additional noise and disturbance	
Quality of accommodation	
Poor quality of accommodation/living experience for future residents.	This is addressed within the <i>Quality of residential accommodation</i> section of the report. The overall quality of accommodation was found to be acceptable.
Transport and Highways impacts	
Traffic and congestion. Has a parking assessment of all developments expected overspill been carried out?	The proposed parking provision would meet the policy requirement; therefore, a parking stress survey is not required. If a CPZ were

	implemented future residents would be excluded from applying for permits.
Road safety.	It is not considered that the proposal would cause a reduction road safety.
Lack of access for emergency vehicles.	It has been demonstrated that emergency vehicles can access both sites.
Insufficient car parking provision.	The proposed parking provision would meet the policy requirement.
Construction disruption	This would be managed through a Construction and Environmental Management Plan to be secured by condition.
Tress and ecology	
Loss of trees, greenery, animals and natural habitat for wildlife.	In total, 45 live trees and 2 tree groups would be lost, and 41 trees would be planted in their place. The Council's Trees officer does not object to this given the limited quality of the existing trees. To ensure a suitable amount of biodiversity is secured, a Biodiversity Enhancement Strategy shall be secured by condition.
Air Quality	
Additional pollution.	Mitigation measures have been included and a contribution of £6,700 agreed, to ensure the development would be air quality neutral.
Other	
Impact on local infrastructure, amenities and services (water, electricity, doctors, dentists, rubbish collections, local schools and transport).	Water supply is the responsibility of Thames Water and electricity National Grid and UKPN. Officers do not consider that the additional residents from the proposal would result in a harmful additional strain on existing amenities.
Overpopulation of area. Pampisford road is becoming saturated in concrete.	
Maintenance of foul waste pipe running under gardens.	The maintenance of this would be the responsibility of the landowner and Thames Water.
Drawings do not show rear extension to Montpelier Road properties.	Officers have taken the presence of the rear extensions and recent approvals to the Montpelier Road properties into consideration when making the assessment.
Loss of view.	The existing views are not protected and are not a material consideration in this case.
Loss of property value.	Local property values are not a material consideration in this case.
Support	Officer comment
Provides affordable housing.	This is a benefit of the proposal which is supported by the Local Plan and London Plan.

- 6.5 Following the submission of amended drawings neighbours were re-consulted and site notices were displayed in the vicinity of the application site.
- 6.6 No of individual responses: 8 Objecting: 4 Supporting: 4
- 6.7 No additional material objections were raised. Additional material matters of support raised were it looks good and provides additional housing in an appropriate location.

7 RELEVANT PLANNING POLICIES AND GUIDANCE

Development Plan

- 7.1 The Council's adopted Development Plan consists of the London Plan (2021), the Croydon Local Plan (2018) and the South London Waste Plan (2022). Although not an exhaustive list, the policies which are most relevant to the application are:

London Plan (2021)

- D1 London's form, character and capacity growth
- D3 Optimising site capacity through the design led approach
- D4 Delivering Good Design
- D5 Inclusive Design
- D12 Fire Safety
- H1 Increasing housing supply
- H2 Small sites
- H6 Affordable housing tenure
- G5 Urban Greening
- G6 Biodiversity and access to nature
- G7 Trees and Woodlands
- SI 1 Improving air quality
- SI 2 Minimising Greenhouse Gas Emissions
- SI 8 Waste Capacity and Net Waste Self-Sufficiency
- SI 12 Flood Risk Management
- SI 13 Sustainable Drainage
- T5 Cycling
- T6 Car parking

Croydon Local Plan (2018)

- SP2 Homes
- SP4 Urban Design and Local Character
- SP6 Environment and Climate Change
- DM1 Housing Choice for Sustainable Communities
- DM10 Design and Character
- DM13 Refuse and Recycling
- DM16 Promoting Healthy Communities
- DM19 Promoting and Protecting Healthy Communities
- DM23 Development and Construction
- DM24 Land contamination
- DM25 Sustainable Drainage Systems and Reducing Flood Risk
- DM27 Protecting and enhancing our biodiversity

- DM28 Trees
- DM29 Promoting Sustainable Travel and Reducing Congestion
- DM30 Car and cycle parking in new development

7.2 The Development Plan should be read as a whole, and where policies conflict with each other, the conflict must be resolved in favour of the policy contained in the last document to be adopted, approved or published as part of the development plan, (in accordance with s38(5) of the Planning and Compulsory Purchase Act 2004).

Planning Guidance

National Planning Policy Framework (NPPF)

7.3 Government Guidance is contained in the NPPF, updated on 20 July 2021, and accompanied by the online Planning Practice Guidance (PPG). 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:

- Achieving sustainable development
- Delivering a sufficient supply of homes
- Promoting sustainable transport
- Achieving well designed places

SPDs and SPGs

7.4 There are also several Supplementary Planning Documents (SPD) and Supplementary Planning Guidance (SPG) documents which are material considerations. Although not an exhaustive list, the most relevant to the application are:

- London Housing SPG (March 2016)
- London Mayoral Affordable Housing SPG: Homes for Londoners (August 2017)
- Technical Housing Standards: Nationally Described Space Standard (2015)
- National Design Guide (2021)

8 MATERIAL PLANNING CONSIDERATIONS

8.1 The main planning issues raised by the application that the committee must consider are:

1. Principle of development
2. Housing Mix
3. Affordable Housing
4. Design and impact on character of the area
5. Quality of residential accommodation
6. Impact on neighbouring residential amenity
7. Trees, landscaping and biodiversity
8. Access, parking and highway impacts
9. Flood risk
10. Sustainability and energy efficiency
11. Fire Safety
12. Other Planning Issues

Principle of development

- 8.2 The Croydon Local Plan sets out a housing target of 32,890 homes over a 20-year period from 2016-2036 (1,645 homes per year). The London Plan requires 20,790 of those homes to be delivered within a shorter 10-year period (2019-2029), resulting in a higher annual target of 2,079 homes per year.
- 8.3 The Croydon Local Plan also sets out a target for development on Windfall sites of 10,060 homes (approximately 503 per year). The London Plan requires 6,410 net completions on small sites (below 0.25 hectares in size) over 10 years, with a small-sites housing target of 641 per year.
- 8.4 In terms of development on small sites, policies H1 and H2 of the London Plan require Boroughs to support well-designed new homes on small sites and that incremental intensification of existing residential areas plays an important contribution to this level. The London Plan (para 4.2.4) identifies such existing residential areas as within PTALs 3-6 or within 800m distance of a station or town centre boundary. The application site is located within an area where the PTAL varies; the WebCAT PTAL guide indicatively shows the PTAL for the 100m square in which the site sits as 2, although the calculation excludes Purley Station, which should be included as it is approximately 850m walking distance (and well within the required 960m cut-off distance); therefore in practice the PTAL is likely to be higher. The site is also within 800m of a district centre (Purley) and therefore is considered as a site suitable for incremental intensification under the London Plan.
- 8.5 The principle of residential development in this location is therefore acceptable, although the amount of development acceptable on the site is subject to the detailed considerations below.

Unit Mix

- 8.6 Policy DM1.1 requires developments of 10 units or more to provide a proportion of homes with 3 or more bedroom. The site's location has evolved, such that (as defined by Local Plan Table 4.1) it is considered a "suburban" setting, but is becoming "urban" (2-4 storey buildings within 800m of a district centre etc.) For a suburban location with a PTAL of 2, the requirement is to have at least 70% of the units to have 3-bedroom (although for a PTAL of 4, this is reduced to 60%, and for an urban setting, 40-60%). However, this does not apply for affordable units, where there is agreement with the associated affordable housing provider that three or more bedroom dwellings are neither viable nor needed as part of the affordable housing element of any proposal.
- 8.7 Policy DM1.2 seeks to prevent the loss of small family homes by restricting the net loss of 3-bedroom homes and the loss of units that have a floor area less than 130 sqm.
- 8.8 The proposal would result in the loss of six family homes, although would provide 31 x 3-bedroom units, and as such there would be no net loss of 3-bedroom homes.
- 8.9 As a total 46% of the units would have 3-bedrooms. However, of the proposed market units, 69% would have 3-bedrooms, which broadly aligns with the 70% policy requirement for a PTAL 2, and exceeds the 60% requirement for a PTAL 4.
- 8.10 In relation to the affordable units, the applicant has provided correspondence with the RP (Registered Provider) Croydon Churches Housing Association, who are expected to take-on the affordable units, and who confirm a preference for 2-bedroom units and

the acceptance of some 1-bedroom units. The lack of affordable 3-bedroom homes is therefore considered acceptable in this instance.

Affordable Housing

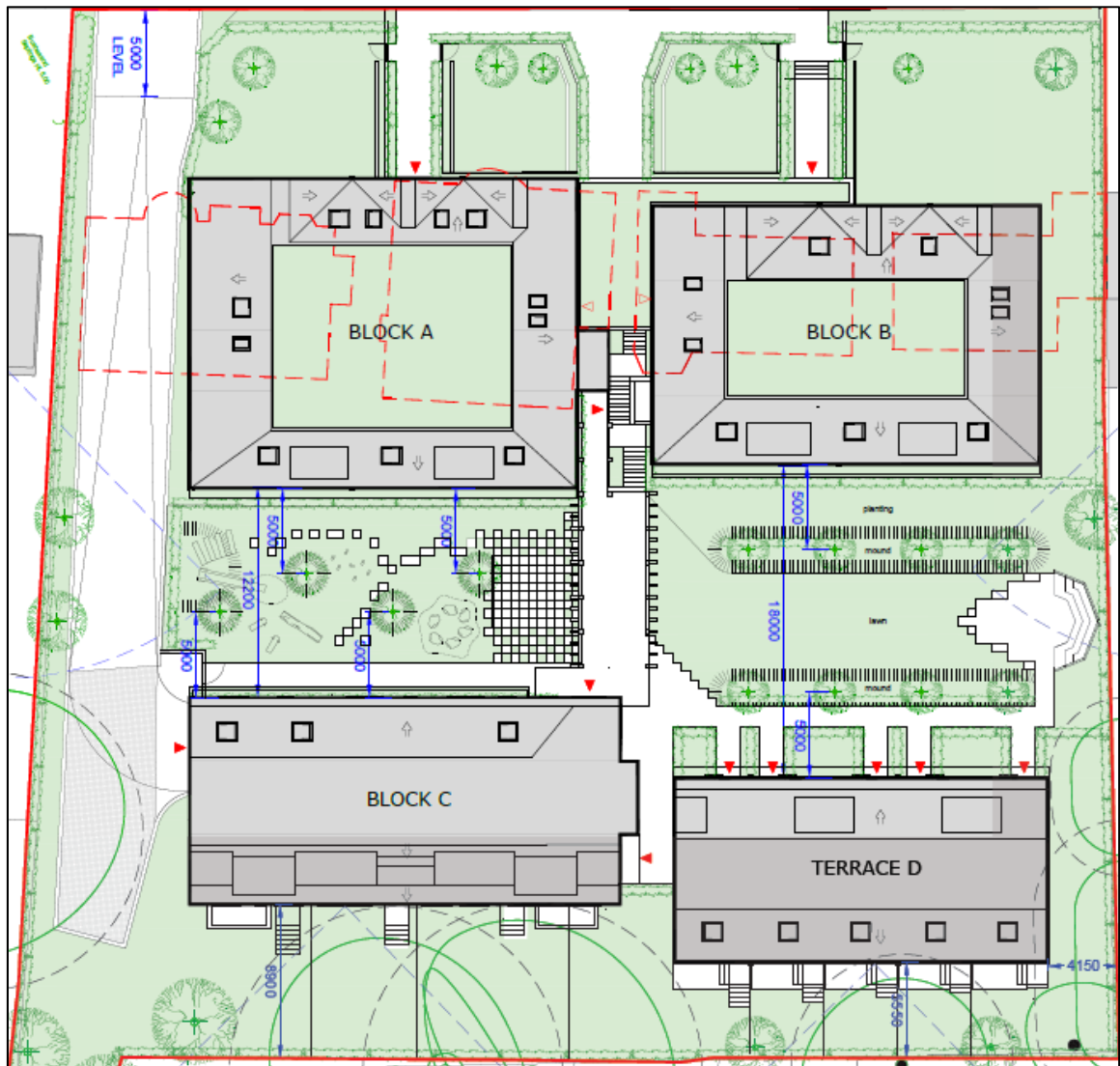
- 8.11 Local Plan Policy SP2 requires the council to negotiate up to 50% affordable housing (subject to viability), with a minimum of 30% (subject to review mechanisms) on a habitable room basis. This is to be sought at a 60:40 split between affordable rented homes and intermediate homes.
- 8.12 The proposed development would provide 22 affordable homes, which amounts to 33% of homes, and 28% affordable housing by habitable room. The tenure splits would be 60% at London Affordable Rent (13 units) and 40% (9 units) at shared ownership, calculated on a habitable room basis. The proposal therefore achieves the required tenure split and is 2% short of the minimum amount of affordable housing provision.
- 8.13 All the affordable units would be within the block proposed at no. 118-120 Pampisford Road. Having a single block makes it easier for an RP to manage and set service charge levels, and avoids any possibility of poor doors. Appropriately the market and affordable units are of comparable size relative to the number of bedrooms and both sites have a similar ratio of amenity space provision and facilities. The design and finish of the blocks are similar, which should ensure the tenures are indistinguishable from each other.
- 8.14 As part of their submission, the applicant submitted a financial viability appraisal which has been assessed by the Council's consultants BPS Chartered Surveyors. Both the applicant's and the Council's assessors agree that the proposed level of affordable housing would put the scheme in deficit.
- 8.15 The proposed affordable housing is therefore accepted as no additional affordable housing could be viably and reasonably be provided. Early and late-stage review mechanisms are recommended to be secured through the S106 agreement to capture any changes (for example increase in house prices) which may result in increased affordable housing provision and/or contribution. The provision of 22 affordable homes in this location, in particular the 13 London Affordable Rent homes, are a significant benefit.

Design and impact on character of the area

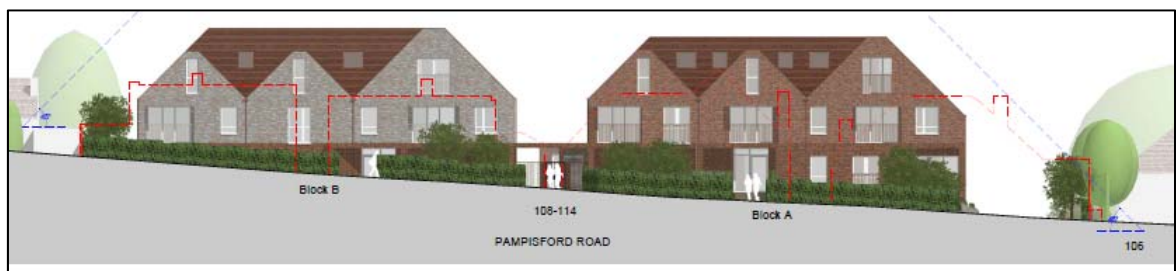
- 8.16 The NPPF attaches great importance to the design of the built environment and good design is a key aspect of sustainable development. It views the creation of high quality, beautiful and sustainable buildings and places as fundamental to the planning process. New developments are encouraged to respond to local character and history and reflect the identity of local surroundings and materials.
- 8.17 Policy SP4.1 states that the Council will require development proposals to respect the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. Furthermore, the proposals should have regard to the pattern and grain of the existing spaces and streets in orientation, scale, proportions and mass. Development proposals should also make a positive contribution to a coherent public realm, streetscape and wide cityscape, and incorporate the highest quality materials and design appropriate to its context. Policy SP4.1 states that development proposals should be of a high quality, which respect

and enhance Croydon's varied local character and contribute positively to public realm and townscape. In addition, Policy SP4.2 requires development proposal to be informed by the distinctive qualities and identity of the relevant Places of Croydon.

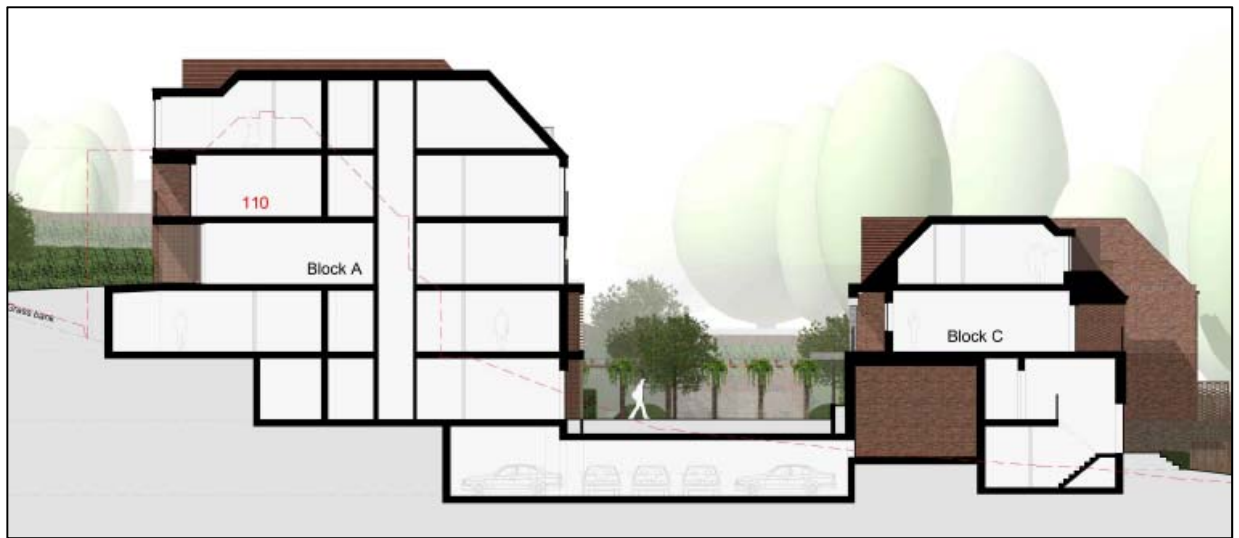
- 8.18 Policy DM10.1(c) requires development proposals to be of high quality. It states that whilst achieving a minimum three-storeys proposals should respect, the pattern, layout and siting of development, and the scale, height, massing, and density. It should also respect the appearance, existing materials and built and natural features of the surrounding area, and the Place of Croydon in which it is located
- 8.19 Policy DM10.7(b) and (d) outline that in order to create a high-quality built environment, proposals should demonstrate that high quality, durable and sustainable materials that respond to the local character are incorporated and the roof-form positively contributes to the character of the local area and responds to local context.
- 8.20 The historic character of this section of Pampisford Road is generally suburban with detached two-storey dwellings. However, this has evolved and there are now a number of recent developments in close proximity to the application site that have made the character more dense and urban. Notable developments fronting Pampisford Road include prominent 3-storey homes at no. 1 Wyvern Road (ref. 19/04443/FUL), 3-4 storey homes at no. 2 Wyvern Road (ref. 20/00532/FUL), flatted development of up to 5-storeys at nos. 126-132 Pampisford Road (ref. 20/01550/FUL) and two-storey plus lower ground floor and roof level flatted development at no. 122 Pampisford Road (18/00236/FUL). Furthermore, the pattern of development has evolved with the addition of back-land development. This includes the addition of cul-de-sacs (St Denys Close and The Close), and back-land blocks (nos. 126-132 Pampisford Road).
- 8.21 The proposed development would take place over two sites, described as Site 1 and Site 2.
- 8.22 **Proposed Design: Site 1**
- 8.23 On Site 1, the 4 existing houses would be demolished and replaced by 4 buildings (A, B, C and D) providing the market housing.
- 8.24 Blocks A and B would be two full storeys high at the front with an additional top storey contained within a habitable roof level and a basement level. The site slopes steeply toward the rear, such that an additional basement would result in four-storeys plus a habitable roof level at the rear, plus a further basement level under part of the building and the communal terrace. They would feature gables at the front and rear, and hipped roofs to the side. The buildings would feature grey, brown and red bricks, and brown roof tiles.



Proposed layout of nos. 108 - 114 Pampisford Road



Proposed streetscene of Blocks A & B at nos. 108 - 114 Pampisford Road



Proposed section of nos. 108 - 114 Pampisford Road

- 8.25 Block C would be two-storeys with a habitable roof level facing into the site and two/three-storeys plus a habitable roof level facing rearwards and Block D would be two-storeys plus a habitable roof level at the front and rear. They would feature dormer windows at the front and rear. The buildings would feature grey, brown and red bricks, and brown roof tiles.



8.26

Proposed front and rear elevations of Blocks C & D at nos. 108 - 114 Pampisford Road

Proposed Design: Site 2

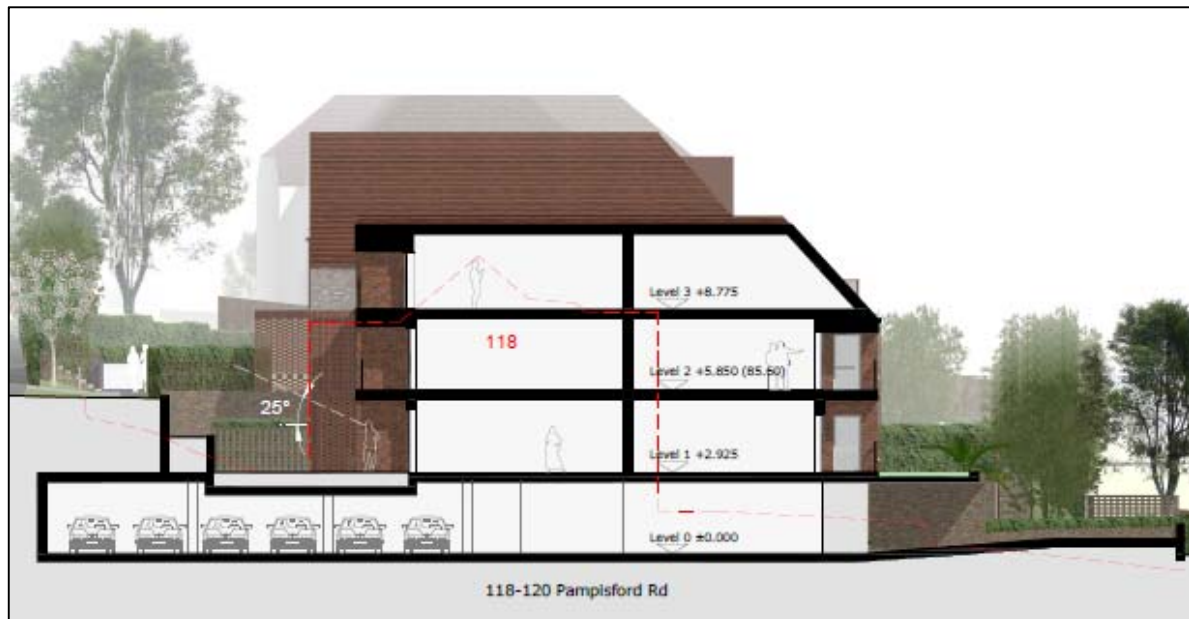
- 8.27 On nos. 118 - 120 Pampisford Road (Site 2), the proposal includes the erection of a single two/three-storey block with habitable roof level and basement. It would feature gables at the front and rear, and hipped roofs to the side. The building would feature grey, brown and red bricks, and brown roof tiles.
- 8.28 Vehicle access would be adjacent to no. 116a and would lead down to an underground car park.



Proposed layout of nos. 118 - 120 Pampisford Road



Proposed streetscene of nos. 118 - 120 Pampisford Road



Proposed section of nos. 118 - 120 Pampisford Road

Layout and access: Site 1

- 8.29 For nos. 108-114, the site would be arranged into four blocks. Block A and Block B, with defensible space to the front that would be landscaped with a central communal amenity separating the front blocks from the two, smaller, rear blocks (Block C and Block D). There would be basement parking accessed from the south of the site along the boundary with no. 106 Pampisford Road.
- 8.30 Having two larger blocks to the front of the site along with three separate entrance points to the building gives the building a suburban, residential appearance on the street scene. The proposed building would be well set-in from the boundary (3.6m - 7.5m) which would ensure there is a suitable degree of spacing to the neighbouring properties.
- 8.31 The proposed buildings would be sited between 9.8m-11.45m from the pavement edge. They would be sited forward of the existing buildings and neighbouring buildings (approx. 3.3m beyond no. 106 and 1.7m beyond the main front elevation of no. 116). The building line along Pampisford Road is not consistent, although the proposed building line, given the scale of the building, would give the proposed development a relatively high degree of prominence. This will be discussed further below in the height, scale, massing section.
- 8.32 The proposed blocks to the rear would not follow the typical pattern of development of the area. However, they would be read in the immediate context of the houses within St Denys Close and within the wider context of the properties on The Close and the development at nos. 126-132 Pampisford Road. Officers note that the pattern of the area has continued to evolve and therefore, subject to an appropriate scale and design a building(s) could be supported within the rear garden.

Layout and access: Site 2

- 8.33 For nos. 118-120, the site would comprise one large block with defensible space to the front that would be landscaped. To the rear would be communal amenity space and play space. There would be basement parking accessed from the south of the site along the boundary with no. 116a Pampisford Road. The building would be accessed by a single entrance within the middle of the site. The siting of the entrance is considered appropriate and gives clear legibility to the building.
- 8.34 The proposed building would be well set-in from the boundary with no. 116a (5.4m) which would ensure there is a suitable degree of spacing to this neighbouring property. No. 122 is a recent development and is only 1.4m from the boundary and the proposal would match this separation distance, making a more compact relationship between these properties.
- 8.35 The proposed front building would be sited between 10.5m-12.4m from the pavement edge. It would be sited forward of the existing buildings. In relation to no. 116a it would be approx. 2.1m ahead of their main front building line and approximately level with no. 122). The proposed front building line and stagger back towards no. 116a is generally appropriate. However, given the scale of the building, the proposed building line would give the proposed development a relatively high degree of prominence. This will be discussed further below in the height, scale, massing section.
- 8.36 Due to the location of the bike store at a lower ground level a lift and staircase to the front is proposed. Whilst not a common feature for a suburban location such as this, their presence would not be unduly incongruous.

Layout and access: Summary

- 8.37 Both proposed developments are spread across plots (nos. 108-114: four plots and nos. 118-120: two plots), which is at odds with the historic grain of the area, but in-keeping with the emerging character of the area, notably the development nos. 126-132 Pampisford. However, the buildings would be visually broken down into smaller sections (through the use of gables and set backs) resonating with the widths of the buildings on the street. In addition, the depths of the proposed frontage buildings are much greater than the existing buildings either side. However, this would not be harmful to the street scene, and the depths of these buildings are in-keeping with the emerging character of the area and the development at nos. 126-132 Pampisford.

Height, scale and massing

- 8.38 For nos. 108-114, Blocks A and B fronting Pampisford Road would appear as two-storeys with a third storey within the roof. There would also be a lower ground floor level that would not be immediately visible from the street (through utilisation of the changing topography). The buildings would feature hipped roofs that would pull the massing away from the neighbouring properties. The ridge heights of the proposed buildings would be higher than the neighbouring properties, but not excessively so and appropriately Block A is lower than Block B to reflect the sloping levels of the street. Officers consider that the separation distances between the buildings and roof form should ensure that the proposed heights would be harmful to the roofscape, noting the emerging character of the locality.

- 8.39 As noted above, the frontage buildings would be forward of the neighbouring properties and the proposed buildings would also be higher than the neighbours. They will therefore assume a degree of prominence within the streetscene. However, Officers note that given the tapering of the massing away from the boundaries and appropriate design, the presence of the proposed buildings would not be detrimental to the appearance of the streetscene.
- 8.40 Due to the slope of the site the rear of Buildings A and B would appear as four-storeys with a fifth storey within the roof. Whilst substantial, this part of the building would not be readily visible from public vantage points, although may be visible from a distance from St Denys Close and Montpelier Road. Officers note that whilst the appearance and roof form is of a good quality of design, the scale and prominence of the rear of Blocks A and B would cause some harm to the character of the surrounding area.
- 8.41 The rear blocks (C and D) would be 2/3-storeys high with an additional storey within the roof. The scale of these buildings would be subservient to the proposed taller buildings to the front of the site. However, they would be larger than the buildings within St Denys Close and their scale and mass means that they would be a prominent intervention within the rear garden setting. The proposed blocks to the rear would be 12m and 18m from the buildings to the front, allowing for communal areas in between. The scale of the proposed buildings and separation distances would result in a significant amount of built form on the site. Officers consider that the presence of such large buildings to the rear, would result in some harm to the character of the area, which must be weighed in the planning balance.
- 8.42 For nos. 118-120, fronting Pampisford Road the building would appear as one/two-storeys with an additional storey within the roof. There would also be a lower ground floor level that would not be immediately visible from the street (through utilisation of the changing topography). The building would feature hipped roofs that would pull the massing away from the neighbouring properties. Furthermore, the building would step-down a storey next to no. 116a. Appropriately, the proposed ridge height would be lower than no. 122 and higher than no. 116a, with the proposed change in roof height towards no. 116a creating a suitable transition down. The proposed height and massing should ensure that the development is compatible with the roofscape of this section of Pampisford Road
- 8.43 Due to the slope of the site the building at the rear would appear as three-storeys with a habitable roof. Whilst large, this part of the building would not be readily visible from public vantage points and would be in-keeping with the scale of the development at no. 122.

Appearance

- 8.44 The character of the area does not show high levels of uniformity to the design of the houses; however, they do show shared design characteristics, including tiled pitched roofs, brick and render elevations, and substantial soft landscaping.
- 8.45 The architectural expression reflects the traditional forms and materials of the buildings on the street, with contemporary detailing, which officers consider has successfully integrated with the character of the street. The multiple pitched roofs to the front elevations of both development sites are acceptable and contribute to a more suburban aesthetic, whilst also breaking up the mass and bulk of the scheme. In general, the proposed front facing blocks create a horizontal rhythm that works well along the street

scene as it allows the buildings to not appear overly tall and out of scale within its surroundings.

- 8.46 Balconies to the front elevation, although not a common feature within the street scene, are successfully integrated within the building, set well back from Pampisford Road and create visual interest within the façade. The size, layout and hierarchy of the proposed fenestration is appropriate. The rear façades take on a similar narrative as the front façade in terms of hierarchy and detailed design and are considered appropriate. The subtle brick detailing and window reveals add to the high-quality appearance of the building.
- 8.47 The rear blocks (C&D) are of a simpler appearance with a pitched roof featuring front and rear dormer windows. The front of Block C has been designed to limit any windows facing back towards the buildings at the front. The general composition of this elevation is considered acceptable. The rear elevation has a number of windows and their layout lacks rhythm. However, their presence would not be unduly harmful.
- 8.48 Block D comprises four terrace houses and their composition and fenestration layout are consistent and suitably designed.
- 8.49 The use of three brick colours (grey, red and brown) and a brown roof tile are appropriate and have been successfully integrated across the buildings to create a harmonious development.
- 8.50 Conditions are recommended requiring further details of the materials another and further details of the architectural detailing. Further details of the boundary treatment are also required by condition, at present a 1.8m high fence is shown all the way up to the pavement edge which is not appropriate.
- 8.51 To safeguard the appearance of the development conditions restricting the installation of telecommunications equipment and pipes to the front elevation should be attached. As should a condition requiring details of any external plant equipment.

Quality of residential accommodation

Block at nos. 108-114 Pampisford Road

Unit	Size (bedroom/person/storey)	GIA (sqm) proposed	Min. GIA (sqm)	Amenity Space (sqm)	Min. Amenity Space (sqm)	Built in storage space (sqm)	Min. built in storage (sqm)
1, 2, 3, 4, 10, 11, 18, 19, 20, 21, 27, 28	3b/4p	74	74	7-8.5	7	3.6	2.5
5 & 9	3b/4p	78-79	74	7	7	2.5	2.5
6 (wc)	3b/4p	84	74	7	7	2	2.5
22 (wc)	1b/2p	60	50	5	5	1.3	1.5
23 (wc)	1b/2p	55	50	5	5	1.5	1.5
12, 29, 30	1b/2p	50	50	5	5	1.5	1.5
13, 14	1b/2p	50	50	5/6	5	1.1	1.5
15 (wc)	3b/4p	86	74	7	7	3	2.5
16 (wc)	1b/2p	60	50	5	5	1.5	1.5

17	2b/3p	65	61	6	6	2.4	2
31	3b/4p	84	74	7	7	2.3	2.5
32	3b/5p	99	86	7	7	4.4	2.5
33	3b/4p/2s	91	84	10+	7	4.8	2.5
34	1b/2p/2s	58	58	10+	5	2.6	1.5
35	2b/3p/2s	71	70	10+	6	3	2
36	3b/4p	79	74	7	7	2.6	2
37	1b/2p	51	50	7	5	1.6	1.5
38	3b/4p	75	74	7	7	2.3	2
41-45	3b/5p/2s	102	93	10+	8	1.6	2.5

Block at nos. 118-120 Pampisford Road

Units	Size (bedroom/ Person/ storey)	GIA (sqm) proposed	Min. GIA (sqm)	Amenity Space (sqm)	Min. Amenity Space (sqm)	Built in storage space (sqm)	Min. built in storage (sqm)
1 (wc)	1b/2p	60	50	7	24	2.5	2
2 (wc)	2b/4p	96	70	14	7	3.1	2
3-4, 16, 17, 19	2b/4p	70-72	70	7	5	2.5-2.8	2
5-8, 11-14, 15	2b/3p	61-64	61	6.5-7	6	2	2
9-10	1b/2p	50-54	50	5-7	5	1.6	1.5
18 (wc)	2b/4p	82	70	15	7	3.8	2

Unit and room sizes

- 8.52 Policies SP2.8 of the Local Plan and D6 of the London Plan require new homes to be of high quality and achieve the minimum standards set out in the National Technical Standards (2015). This includes achieving ceiling heights of 2.5m.
- 8.53 The unit sizes, room sizes and floor to ceiling heights (2.6m) comply with the relevant standards as set out in Local Plan, London Plan and National Space Standards. There are some shortfalls in the provision of storage space, but they would provide storage space for household items (vacuum cleaners, appliances, etc.) and the flats are sufficient in size to be able to accommodate storage cupboards. This harm is not to the extent to justify refusal.

Amenity space and Play space

- 8.54 Policy DM10.4 requires 5sq.m of private amenity space per 1–2-person unit and an extra 1sq.m per extra occupant thereafter. It also stipulates that the minimum depth and width for all balconies and other private external spaces should be 1.5m. All the units achieve the minimum size and functionality.
- 8.55 Policies DM10.4 and DM10.5 of the Local Plan require all flatted developments to provide functional and high quality private and communal amenity space, in addition to child play space.

- 8.56 The proposed blocks at nos. 108-114 Pampisford Road, would be served by a communal space of approximately 300sq.m, which is suitably located between the front and rear blocks. The proposed blocks at nos. 118-120 Pampisford Road, would be served by a communal space of approximately 230sq.m, which is suitably located at the rear of the site. Both spaces are shown to be of a high quality and further details of the layouts would be secured by condition.
- 8.57 All flatted development and developments of 10 or more houses must provide a minimum of 10sq.m per child of new play space, calculated using the Mayor of London's population yield calculator.
- 8.58 The proposed blocks at nos. 108-114 Pampisford Road would produce an initial child yield of 18.9 children, generating a need for 190sq.m of play space. The proposed provision for these blocks is approximately 230sq.m.
- 8.59 The proposed blocks at nos. 118-120 Pampisford Road would produce an initial child yield of 14.7 children, generating a need for 150sq.m of play space. The proposed provision for this block is approximately 160sq.m.
- 8.60 The private amenity space, communal space and play provision for the development is therefore considered acceptable.
- 8.61 Daylight, outlook and privacy for future occupants
- 8.62 Policy DM10.6 requires developments to provide adequate sunlight and daylight to potential future occupants. Paragraph 6.81 of the Local Plan notes that designers should consider the position and aspect of habitable rooms, gardens and balconies, and avoid windows facing each other where privacy distances are tight.
- 8.63 The London Plan (2021) states that developments should maximise the provision of dual aspect units, with single aspect units only provided where it considered to be a more appropriate design solution in order to optimising capacity, and where it can be demonstrated they will have adequate passive ventilation, daylight, privacy and avoid overheating.
- 8.64 There are no single aspect north facing units, with only 6 of the 67 proposed units to be single aspect. That said, a number of units would be dual aspect by virtue of obscured side windows or where a second window faces into the side of balcony. Where side facing windows are obscured, a condition is recommended requiring them to be obscured to a height of 1.7m above internal finished floor level (permitting clear glazing above where it would not harm privacy) and requiring 150mm window opening restrictors (allowing a degree of ventilation, again without allowing substantial views out). Nevertheless, Officers are satisfied that the applicant has sought to maximise the number of dual aspects homes through the design of the development.
- 8.65 The outlook from most of the units is clear and unobstructed. Some of the units at lower level will have their outlook limited due to the changing land levels. However, these units all have a sufficient separation distance to the bank/retaining walls in front of them to ensure an adequate degree of outlook.
- 8.66 Appropriately, internally there would be an 18m window-to-window distance where habitable rooms would face each other, which is in line with the suggested requirement (18-21m) suggested in the Mayor's Housing SPG and the Local Plan. The front and rear facing windows would be at least 30m from the windows they would directly be

facing. The street facing windows would have an acceptable amount of defensible space to the footway. The ground floor windows facing the communal spaces would need to have an adequate landscape buffer to ensure they are not unduly overlooked. Further details of the landscaping to provide a buffer to the ground floor amenity spaces should be secured within the landscaping condition.

8.67 To determine the level of daylight to the proposed habitable rooms the applicant has applied the target daylight factor (TDF) test. The daylight factor is the illuminance at a point on the reference plane in a space, divided by the illuminance on an unobstructed horizontal surface outdoors. The recommendations for standard window lit rooms are met if both target daylight factors (the median daylight factor over 50% of the reference plane, and the minimum daylight factor over 95% of the reference plane) are achieved.

8.68 The submitted Daylight and Sunlight report demonstrates that all the habitable rooms would receive adequate levels of daylight.

8.69 Inclusive Access

8.70 The London Plan requires 10% of homes to be designed to be wheelchair accessible (units that are designed for wheelchair users to live in) or easily adaptable for residents who are wheelchair users.

8.71 The proposal includes lifts within each building providing step-free access to all floors and facilities (except for the 5 houses which will have step-free access to their entrances). 8 (12%) wheelchair user homes (M4(3)) are proposed, with the remainder being wheelchair adaptable (M4(2)) in the future. This should be secured by condition.

Impact on neighbouring residential amenity

8.72 Policy DM10.6 of the Croydon Local Plan states that The Council will support proposals for development that ensure that:

- The amenity of the occupiers of adjoining buildings are protected; and that
- They do not result in direct overlooking at close range or habitable rooms in main rear or private elevations; and that
- They do not result in direct overlooking of private outdoor space (with the exception of communal open space) within 10m perpendicular to the rear elevation of a dwelling; and that
- Provide adequate sunlight and daylight to potential future occupants; and that
- They do not result in significant loss of existing sunlight or daylight levels of adjoining occupiers.

Daylight, sunlight and overshadowing

8.73 The applicant has submitted a sunlight and daylight study that tests the scheme against guidance contained within BRE's 'Site Layout Planning for Daylight and Sunlight - A Guide to Good Practice' End Edition, 2011'. The submitted report applies the Vertical Sky Component (VSC) test, and where that fails goes on to do the No Sky Line (NSL) tests. It also applies the Average Sunlight Hours (APSH) and Average Winter Sunlight Hours (APSH) tests.

8.74 For the development at nos. 108-114 Pampisford Road the report has assessed the impact to the VSC for the properties to the front, sides and rear of the application site.

The assessment demonstrates that none of the properties would experience a discernible loss of daylight from the proposed development. Furthermore, the losses of sunlight during both summer and winter to windows and overshadowing to gardens would comply with BRE guidance.

- 8.75 For the development at nos. 118-120 Pampisford Road the report has assessed the impact to the VSC for the properties to the front, sides and rear of the application site. The assessment demonstrates that two windows would experience a reduction of VSC to between 35-40% of their former value. However, these are secondary side windows. This is reflected by the proposed reductions in NSL to the rooms only being between 90-95% of their former value. Furthermore, the losses of sunlight during both summer and winter to windows and overshadowing to gardens would comply with BRE guidance.
- 8.76 The losses of daylight and sunlight to neighbouring properties would therefore be within acceptable parameters.

Outlook and privacy

- 8.77 The planning system cannot protect specific views from private properties but can consider whether a proposed development is intrusive or overbearing to the outlook of a property, particularly residential properties, due to the massing and proximity of a proposal, and whether this would cause demonstrable harm to the amenity of that property.
- 8.78 The London Housing Design Guide in 5.1.1 Standards – identified that ‘in the past, planning guidance for privacy has been concerned with achieving visual separation between dwellings by setting a minimum distance of 18-21m between facing homes’. It says that ‘these are still useful yardsticks for visual privacy, but adhering rigidly to these measures can limit the variety of urban spaces and housing types in the city, and can sometimes unnecessarily restrict density’.

Impacts of Site 1: Nos. 108-114 Pampisford Road

Nos. 65-75 Pampisford Road

- 8.79 The establishment of a street frontage, with the proposed windows set at least 30m from the windows of the existing buildings on the opposite side of Pampisford Road is considered a typical across-street relationship in a suburban context and would not result in a significant loss of outlook or privacy to the occupants of these buildings.

No. 106 Pampisford Road

- 8.80 At the front, Block A would be set-in 7.3m from the boundary with no. 106 and would project 3.4m beyond its front elevation, and at the rear would be 7.65m from the boundary with no. 106 and would project 6.3m beyond its rear elevation. The proposed separation distances should ensure that the proposal would not appear unduly overbearing from this property or cause a significant loss of outlook. The upper floor side windows should be conditioned to be obscure glazed.
- 8.81 No. 106 have windows along their side flank wall. Given the property has an existing garage at this level, which is flush with the main rear wall, the proposal would improve the outlook to these windows.

8.82 Block C would be 9m from the boundary with this property, over 20m away from the building at its closest point and on a lower level, therefore it would not unduly impact the outlook from this property or appear overbearing. Side windows serving habitable room windows are proposed that would overlook the back of their rear garden from 9m away. Given it is the rearmost part of their garden that would be overlooked and there would be a separation distance of 9m, the loss of privacy would not be to an unacceptable extent.

No. 116 Pampisford Road

8.83 Block B would be set-in 3.6m from the boundary with no. 116 and would project 4.5m beyond its rear extension and 6.5m beyond its main rear elevation. It is also noted that no. 116 is on a higher level than the subject site. The proposed block would present quite a large flank projection that would be visible in some views from this property's rear windows and garden. Whilst, the proposal would appear relatively dominant from this property, on-balance, it would be not to be an extent that it would cause an unacceptable overbearing impact or loss of outlook. The upper floor side windows should be conditioned to be obscure glazed.

8.84 Block D would be 3.85m from the boundary with this property, over 20m away from the building at its closest point and on a lower ground level. Therefore, it would not unduly impact the outlook from this property or appear overbearing. Furthermore, the separation distances and angles to the windows would not result in undue overlooking to this property.

Nos. 1-15 Montpelier Road

8.85 Block C would be 8.9m from the boundary with these properties and Block D 5.5m. They would present an almost continuous 3/4-storey elevation facing these properties. It is also noted that the Montpelier Road properties are on a lower level to the application site. The closest property is approximately 20m away from the boundary with the application site, with the nearest part of the proposal approximately 29-30m away. The proposal would be a visible presence when viewed from the Montpelier Road properties, with only partial screening being afforded by the existing boundary trees. Whilst at the very rear of these properties gardens the proposed building may appear somewhat overbearing, these tend to be the least used parts of the garden, and when viewed from the main building and garden area nearest their rear doors, officers consider that the proposal would not appear sufficiently overbearing to justify refusal.

8.86 The window-to window separation distances (29-30m) are sufficient to ensure an acceptable degree of privacy. Whilst the rear gardens would be overlooked at a relatively close distance, they are also reasonably long and the most used areas closest to the house would still retain a good degree of privacy.

No. 11 St Deny's Close

8.87 Block C would be approximately 19.5m from this property and would only be visible from angled views from this property. Block A would be approximately 38m from this property and would also be positioned at an angle to this building. Therefore, the proposal would not unduly impact the outlook from this property or appear overbearing. Furthermore, the separation distances and angles to the windows would not result in undue overlooking to this property.

Impacts of Site 2: Nos. 118-120 Pampisford Road

Nos. 75-77 Pampisford Road

- 8.88 The establishment of a street frontage, with the proposed windows set at least 30m from the windows of the existing building on the opposite side of Pampisford Road is considered a typical across-street relationship in a suburban context and would not result in a significant loss of outlook or privacy to the occupants of these buildings.

No. 116a Pampisford Road

- 8.89 The proposed block would project 8.15m beyond the rear of this property and would be 6.5m from the boundary. The proposed separation distances should ensure that the proposal would not appear unduly overbearing from this property or cause a significant loss of outlook. The upper floor side windows should be conditioned to be obscure glazed.

No. 122 Pampisford Road

- 8.90 The proposed block would be set-in approximately 3.5m from the boundary with no. 122 and would project 3.5m beyond its rear elevation. It is also noted that no. 122 is on a higher level than the subject site. The proposed relationship should not result in the proposal appearing unduly overbearing from this property or cause a significant loss of outlook. The upper floor side windows should be conditioned to be obscure glazed.
- 8.91 One of the proposed top floor flats would be served by a roof level terrace that would face towards this property. It would overlook the obscure flank windows of this property, which would not cause a loss of amenity. There are also side rooflights within this property, although these would be higher and not significantly overlooked. Furthermore, they are secondary to the rear facing window serving this room.

No. 16 The Close

- 8.92 The proposed block would initially be approximately 14m from this property at its closest point and would only be visible in angled views from this property. At a point level with their rear boundary fence the proposed building would then project to within 7.5m of their boundary. Overall, the proposed relationship should not result in the proposal appearing unduly overbearing from this property or cause a significant loss of outlook.
- 8.93 The angles to this property's windows would ensure that they are not unduly overlooked. The separation distance to this property's rear garden would for the most part be approximately 12m, which would afford it a reasonable degree of privacy. The rear most parts of their garden would be overlooked by windows 7.5m away, which is considered acceptable.
- 8.94 A number of balconies and terraces have a patterned brick work to limit side facing views, further details of the screening should therefore be secured by condition.

Noise, Disturbance and Lighting

- 8.95 The balconies/terraces are all proposed between 5sq.m- 14sq.m in size and not capable of hosting large gatherings of people. They are all a sufficient distance from

neighbouring properties to ensure that the occupants would not experience excessive levels of noise and disturbance. The communal spaces are at ground level and whilst, the intensity of use may be greater than a typical residential garden, it is not anticipated that this would be an extent that would result in significant noise and disturbance to neighbours.

- 8.96 The proposed lighting strategies are considered appropriate in terms of the proposed layout and would not cause undue nuisance to neighbours.
- 8.97 Noise during construction would need to be managed through a construction management plan to control hours of work, and statutory nuisance legislation would apply through Environmental Services. A construction and environment management plan would be secured through a condition.
- 8.98 A condition should be attached requiring the submission of details of any plant equipment to be accompanied by a noise impact assessment.

Trees, landscaping and biodiversity

- 8.99 Policy DM10.8 of the Local Plan seeks to retain existing landscape features that contribute to the setting and local character of an area, and existing trees and vegetation including natural habitats. Where the loss of mature trees is justified, replacement trees shall be semi-mature trees and of a commensurate species, scale and form.
- 8.100 Policy DM28 of the Local Plan seeks to protect and enhance the borough's woodlands, trees and hedgerows.

Site 1: Nos. 108-114 Pampisford Road

- 8.101 A total of 36 individual and 2 groups of trees have been surveyed by the applicant. This comprises 6 individual trees and 2 groups within adjoining properties (3 trees of which are subject to protection from a tree preservation order (TPO)), and 28 within the site itself.
- 8.102 The proposal requires the removal of all 30 trees from within the site. 24 of these are Category C (low quality), 4 are Category B (moderate quality) and two have died. The proposal includes the planting of 29 replacement trees.
- 8.103 The Council's Tree officer has reviewed the application and notes that whilst there are a moderate number of trees proposed for removal, the subject trees offer little in terms of visual amenity. Furthermore, a suitable amount of new tree planting has been proposed and further detail in terms of species type size and position should be secured via condition.
- 8.104 A number of the proposed trees would be planted above the basement car park within mounds. The depth would be limited (approx. 1m) therefore it is important that appropriate tree specimens are planted as part of the landscaping.
- 8.105 Three trees on adjacent sites are subject to Tree Preservation Orders (TPO). The three TPO trees near to the site are a Category A, mature Copper Beech within Denys Close on the south-west boundary of the site, and two Category B mature Beech trees within the rear gardens of nos. 3 and 5 Montpelier Road on the south-east boundary of the site.

- 8.106 Part of the root protection area (RPA) of the aforementioned TPO Copper Beech is located within the application site with a proposed vehicular access ramp extending above approximately 15% of the tree's notional RPA. To avoid compaction of soil, damage to roots and to ensure that the subterranean conditions remain suitable for on-going root growth it is proposed that the ramp would be suspended on piles. The Council's Tree officer is satisfied with this approach subject to further details being secured by condition.
- 8.107 The proposed development would be relatively close to the RPAs of the two TPO trees within the rear gardens of nos. 3 and 5 Montpelier Road. However, the Council's Tree officer is satisfied that there is unlikely to be any significant incursion into either trees RPA and that it is unlikely that the proposal would jeopardise their health.
- 8.108 Details of tree protection measures across both sites should be secured by condition.

Site 2: Nos. 118-120 Pampisford Road

- 8.109 A total of 23 individual and 3 groups of trees have been surveyed by the applicant. This comprises of 7 individual trees within adjoining properties and 16 individual and 2 groups of trees within the site itself.
- 8.110 The proposal requires the removal of 15 individual and 2 tree groups from within the site, 15 of these are Category C (low quality), 2 are Category B (moderate quality). The proposal includes the planting of 12 replacement trees.
- 8.111 The Council's Tree officer has reviewed the application and notes that whilst there appears to be a considerable amount of tree removal to facilitate development, the trees proposed to be removed are generally of low quality. The tree survey illustrates new tree planting around the periphery of the site to mitigate in part those trees removed, which is generally accepted. The details of replacement planting should be secured via condition.
- 8.112 The neighbouring Category B trees are located close to the southern boundary of the site away from the proposed development and therefore should not be impacted by the proposal.

Biodiversity and Ecology

- 8.113 Policy DM27 of the Local Plan aims to enhance biodiversity across the borough and improve access to nature, Similarly the NPFF requires developments to provide net gains in biodiversity.
- 8.114 The site is not subject to any statutory or non-statutory designations.
- 8.115 A Preliminary Ecological Appraisal was undertaken and submitted as part of the application. The biodiversity advisor to the Council reviewed the report and noted that additional surveys were required.
- 8.116 These included houses with moderate bat roosting potential requiring two activity surveys between the months of May and September and the houses with low potential, one activity survey between mid-May and August, a camera trap study to determine the species of an unidentified mammal burrow, and a stag beetles survey (should take place between mid-May and early-August).

- 8.117 Due to the time of year the bat and stag beetle surveys cannot be undertaken, therefore the applicant submitted bat mitigation statements, a badger mitigation statement and a stag beetle mitigation statement. These were reviewed by the biodiversity advisor to the Council who considers that the measures for stag beetle mitigation are sufficient. However, notes that without surveys the mitigation statements for the bats and badgers cannot be deemed to be satisfactory as there is no information to demonstrate that mitigation is actually necessary (there may be no mammals present), or to ensure the measures will be sufficient and effective.
- 8.118 Officers therefore recommend that any recommendation of approval is subject to the applicant undertaking the relevant surveys at the appropriate times of year, and providing suitable mitigation and compensation measures following the outcome of those surveys. If this is considered appropriate and sufficient by the biodiversity advisor to the Council, then the measures can then be secured by condition. The Council's ecologist has explained that the proposal is likely to be acceptable subject to the proposed mitigation. However, it is necessary for the Local Planning Authority to have certainty of the likely impacts before issuing its decision, therefore the officer recommendation (as set out in Section 2 of this report) is that the further information needed is approved by officers prior to the decision being issued.
- 8.119 To secure net gain for biodiversity, reasonable biodiversity enhancement measures will need to be provided as part of this application. The proposals demonstrate a commitment to enhancing biodiversity through the provision of biodiverse roofs, tree planting, and soft landscaping. The submitted PEA includes recommendations to provide habitats to support birds, bats, hedgehogs and invertebrates, which are supported by the Council's biodiversity advisor. Further details should be provided within a biodiversity enhancement strategy, which should be secured through a condition.
- 8.120 The London Plan policy G5 requires major development to incorporate urban greening measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage. This recommends a target score of 0.4 for developments that are predominately residential.
- 8.121 The applicant has submitted calculations that demonstrate the measures within the proposal would achieve an urban greening score of 0.42 for nos. 108-114 and 0.43 for nos. 118-120 (exceeding the target threshold of 0.4). These scores should be secured by condition.

Access, parking and highway impacts

- 8.122 Policy SP8 of the Local Plan concerns traffic generation, sustainable travelling and parking standards. Policy DM30 of the Local Plan seeks to ensure that there is an appropriate level of car and cycle parking. Policy DM13 of the Local Plan (2018) seeks to ensure that the location and design of refuse and recycling facilities are treated as an integral element of the overall design.
- 8.123 The application site is in an area with a relatively low public transport accessibility level of 2, although no. 108 is immediately adjacent to a PTAL 4. It is within a reasonable walking distance to Purley Railway station (0.9-1km – 11-13mins). Furthermore, there are bus stops close-by. The sites are not in a CPZ but has waiting restrictions in front of them which are operational Mon-Sat 9am-5pm. The parking bays are unrestricted. The sites have individual vehicle access points.

Trip Generation

- 8.124 The applicant has provided TRICS (Trip Rate Information Computer System) analysis to compare the existing and proposed expected daily trips.
- 8.125 For nos. 108-114, there are an expected 39 existing daily trips and an anticipated 270 for the proposed, with 145 of those driving a car or van. However, overall, there will be an increase of only 14 two-way car trips in the AM peak and 11 in the PM peak.
- 8.126 For nos. 118-120, there are an expected 19 existing daily trips and an anticipated 122 for the proposed, with 66 of those driving a car or van. However, overall, there will be an increase of only 5 two-way car trips in the AM peak and 5 in the PM peak.
- 8.127 It is considered that these proposed increases in motor vehicle trip numbers would not have a significant impact on the local highway network.
- 8.128 In terms of additional public transport trips, for nos. 108-114 there would be 42 net additional bus trips and 27 train journeys and for nos. 118-120 there would be 19 net additional bus trips and 12 train journeys. It is considered that the proposed additional trips would not have a significant effect on the operation of the existing bus and train network.

Car Parking

- 8.129 The London Plan sets out parking standards based on a site's PTAL. For this site, officers have erred on the side of caution and the PTAL has been assumed to be 2, although in practice it is likely to be higher (resulting in a lower parking requirement). For this PTAL, 0.75 spaces/unit for 1 and 2 bed units and 1 space/unit for 3 bed units are required. For nos. 108-114 this results in 42 parking spaces being required on site and they are proposing 43, and for nos. 118-120 17 are required and 22 are proposed. Overall, 65 spaces are proposed for 67 homes, which is more than the London Plan maximum. However, the provision of additional parking spaces does not cause harm and the proposed car parking provision is therefore considered acceptable.
- 8.130 London Plan Policy T6.1 requires 3% of dwellings to be provided with a disabled parking bay, with it demonstrated how a further 7% could then be provided in the future. It (along with Policy DM30) also requires 20% of the parking spaces to have active EVCPs (electric vehicle charging points) with the remainder having passive connectivity.
- 8.131 In total 6 disabled bays are shown across the two sites. At present for nos. 108-120 one bay is shown, although there appears scope in the car park for bays 21 and 22 to be reconfigured to create a further space. This would meet the requirement for a 10% provision across the development (and would still result in sufficient parking spaces overall). Appropriately, 17 of the 67 (25%) spaces would have active EVCPs, with the remainder as passive. This should be secured by condition.
- 8.132 Future occupants of the proposed development would be restricted from being able to obtain residents' parking permits, for CPZ through a clause in the s.106 agreement. Membership of a car club for future occupants for 3 years should also be secured within the s.106 agreement.

Cycle parking

- 8.133 A total of 104 long-stay and 6 short-stay cycle parking spaces for residents are proposed at nos. 108-114, and 45 long-stay and 2 short-stay spaces are proposed at nos. 118-120. This would be in the form of two-tier and Sheffield cycle stands and would include a 5% provision for larger/adaptable bicycles. This would comply with the requirements of London Plan policy T5. To access the cycle store for nos. 118-120, an external lift has been proposed at the entrance.

Access and servicing

- 8.134 It is proposed that most delivery and servicing arrangements will take place on street, as existing.
- 8.135 For nos. 108-114, car parking would be provided at basement level. The access via a dropped kerb would be from the west of the existing no. 118 Pampisford Road. It would lead to a ramp with a gradient of 1:7. The access ramp would be controlled through a traffic light system as there is only enough width on the ramp for one vehicle at a time. Details of the traffic light system and the barrier arm should be secured by condition.
- 8.136 For nos. 118-120, car parking would be provided at basement level. The access via a dropped kerb would be from the west of the existing no. 108 Pampisford Road. It would lead to a ramp with a gradient of 1:7/1:8. The access ramp would be controlled through a traffic light system as there is only enough width on the ramp for one vehicle at a time.
- 8.137 The existing disused crossovers should be removed, and the adjacent footway made good. The highways works should be completed through an s278 agreement and secured within the s.106 agreement.
- 8.138 A Construction and Environment Management Plan should be secured via condition.

Sustainable Transport Contribution

- 8.139 The proposed development would result in increased walking, cycling and public transport use. Therefore, a sustainable transport contribution is to be secured in the s.106 agreement to mitigate the impacts of the development and secure improvements to include pedestrian and cycling improvements, highway or bus infrastructure.

Waste and Recycling

- 8.140 The proposal includes specific refuse and recycling storage areas within each block. There is sufficient capacity for food, mixed dry recycling and landfill waste. There is adequate space for bulky waste within both sites. The stores serving Blocks A and B at nos. 108-114 are within 10m from the highway. However, the store serving Blocks C and D at nos. 108-114 and at nos. 118-120 are not. Collection from these stores will require internal arrangements for the bins to be collected from this store. A waste management strategy should therefore be secured by condition.

Flood risk and SuDS

- 8.141 Policy DM25.1 of the Local Plan requires development to take account of all sources of flooding from fluvial, surface water, groundwater, sewers, reservoirs and ordinary watercourses.
- 8.142 Policy DM25.2 of the Local Plan requires development at risk from flooding to be safe for the lifetime of development and to incorporate flood resilience and resistant measures.
- 8.143 Both sites are within Flood Zone 1 and are at very low risk from fluvial flooding. They are also both at very low risk from surface water flooding. It is noted that no.108 is partially within an area with potential for flooding of the property below ground level, with the remainder of the site having limited potential. The site is within a critical drainage area.
- 8.144 Policy DM25.2 of the Local Plan requires development to incorporate Sustainable drainage systems (SUDS). The London Plan specifies that development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. Paragraph 169 of the NPPF states that major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate
- 8.145 The submitted Flood Risk Assessment & SuDS Report follows the drainage hierarchy within London Plan Policy SI13 explaining why those SuDS techniques not included cannot be achieved. The Lead Local Flood Authority is satisfied with the general approach and the conclusion that a tanked system, permeable paving and green roofs are the most appropriate form of attenuation. However, they require further information on the green roofs, final drainage layout, hydraulic modelling and confirmation of Thames Water's acceptance of the proposed points of connection and discharge rates. They are satisfied that this information can be secured through a condition.
- 8.146 The report notes that both sites are within the Environment Agency's Groundwater Source Protection Zones (SPZs) and indicates that the site is located in a designated groundwater Source Protection Zone 1(SPZ), therefore infiltration forms of SuDS will not be permitted.
- 8.147 For 108-114, presently the runoff rate is 34 litres/second (l/s), and the Q100 years greenfield run-off rate is 3.841 l/s. The proposed measures would reduce the flow to 1.219 l/s for the 100-year event plus 40% climate change.
- 8.148 For 118-120, presently the runoff rate is 20.9 l/s, and the Q100 years greenfield run-off rate is 3.174 l/s. The proposed measures would reduce the flow to 1.010 l/s for the 100-year event plus 40% climate change.
- 8.149 The proposed attenuation for both sites would exceed greenfield run-off rates in accordance with local plan and London plan policies. A condition should be attached requiring the submission of an updated SuDS Strategy.

Energy efficiency

- 8.150 Policy SP6.2 requires new development to minimise carbon dioxide emissions, including that new dwellings (in major development proposals) must be zero carbon. As a minimum a 35% reduction in regulated carbon emissions over Part L 2013 is

required, with the remaining CO2 emissions to be offset through a financial contribution.

- 8.151 The submitted energy statement sets out how the proposed development would aim to reduce carbon emissions through the “lean, clean, green, seen” energy hierarchy. The London Plan stipulates that 10% of residential Be Lean CO2 savings should be achieved. The energy report demonstrates that CHP would not be suitable.
- 8.152 Through energy efficiency measures across the sites the scheme would achieve the minimum 35% CO2 emission reduction against Building Regulations 2021, Part L using SAP10 emissions factors. The applicants are also proposing the use of renewable technology in the form of Exhaust Air Heat Pumps, which would further reduce CO2 emissions.
- 8.153 These reductions significantly exceed the minimum on-site requirement of a 35% reduction. However, there would still be a shortfall of against the London Plan Zero Carbon Policy requirements, which the applicants propose to off-set through a payment in lieu to the Council (secured through the s.106 agreement).
- 8.154 A condition should be imposed on any permission requiring the CO2 emission on-site reductions are to be met as a minimum and that development is in compliance with the submitted energy assessment and sustainability statement. A condition limiting water usage is necessary and a condition requiring further details of the location, layout and screening of the exhaust air heat pumps. A Site Waste Management Plan has been submitted which explores the potential re-use of demolition material, a condition should be attached requiring the development to be built in accordance with this plan. Be Seen actions should be secured through the s1.06 agreement.

Environmental Impacts

- 8.155 Policy DM23 states that the Council will promote high standards of development and construction throughout the borough by: a. Ensuring that future development, that may be liable to cause or be affected by pollution through air, noise, dust, or vibration, will not be detrimental to the health, safety and amenity of users of the site or surrounding land; and b. Ensuring that developments are air quality neutral and do not lead to further deterioration of existing poor air quality;
- 8.156 Policy SI1 of the London Plan sets out the spatial implications of the Mayor's Air Quality Strategy and how development and land can help achieve its objectives.

Air Quality

- 8.157 An Air Quality Assessment has been submitted with the planning application. The assessment acknowledges that the entire borough is declared as one Air Quality Management Area (AQMA).
- 8.158 It is noted that the proposed development fails to comply with the requirement that all new developments in London should be at least air quality neutral (primarily due to the impacts of additional car movements). However, the proposed provision of cycle storage facilities and EVCP's is considered sufficient to off-set these emissions. The assessment has been reviewed by the Council's pollution team and is found to be acceptable. They request that the recommendations within the report be secured by condition.

- 8.159 It is also request that a contribution of £100 per dwelling towards the Council's air quality fund is secured through the s.106 agreement, to mitigate the air quality impacts of the development.

Contaminated Land

- 8.160 Policy DM23 requires developments on or near potentially contaminated land to undertake a site investigation prior to the state of construction and to undertake any necessary remediation and aftercare measures.
- 8.161 The site was previously used for housing, and no previous industrial or contaminating uses have been identified. The proposal has been reviewed by the Council's contamination advisor and is found to be acceptable. They request a condition requiring the submission of a preliminary risk assessment, followed by a method statement for the works and a verification report.

Fire safety

- 8.162 Policy D12 (Fire safety) of the recently adopted London Plan requires a fire statement to be submitted with all major applications. This should cover matters including the buildings materials, means of escape, features to reduce risk to life (e.g. fire alarms), access for fire service personnel and equipment, access for fire appliances and consideration of potential future modifications.
- 8.163 A Fire Safety Statement has been submitted with the application. The Council's Building Control Surveyor has raised no objections subject to additional information being provided which is recommended to be secured by a condition. This includes further details of compliance with London Plan policies including the provision of evacuation lift facilities.

Other Planning Issues

- 8.164 In line with policy DM16 a health impact assessment was submitted which identifies that the proposal would provide green spaces, employment opportunities, use renewable energy and use high levels of insulation and efficient glazing. Local employment opportunities would be secured through the s.106 agreement. The proposal complies with Policy DM 16.

Conclusions

- 8.165 Regard has been had to section 38 (6) of the Planning and Compulsory Purchase Act 2004 which requires decision makers to have regard to the Development Plan in determining planning applications unless material considerations indicate otherwise, and the NPPF which states that there is a presumption in favour of sustainable development.
- 8.166 The proposal would provide 67 residential units (61 net additional), of which 28% (by habitable room) would be affordable. Through the viability discussions between the applicant's advisers and the Council's independent viability advisers, it has been established that the proposed 22 affordable units (13 LAR and 9 SO) represents the maximum reasonable affordable housing provision.
- 8.167 The proposed site layouts and design of the buildings has generally had sufficient regard to the scale, massing, pattern and form of development in the area (noting the

emerging context), and has optimised the sites potential. However, it is noted that the scale and siting of the proposed blocks to the rear of nos. 108-114 Pampisford Road, and the scale of the rear elevation of the front block of nos. 108-114 would result in some harm to the character of the area, which weighs against the proposal.

- 8.168 The proposed development would result in the creation of modern residential units ensuring good standard of accommodation for future occupiers. The development has been designed to ensure that the amenity of existing local residents would not be unduly compromised.
- 8.169 The proposal would surpass the requirement for 35% of energy reduction to be on-site energy.
- 8.170 The impact upon the highway and transport capacity is considered acceptable. The development would encourage sustainable travel and includes measures to promote this including the provision of cycle storage and excluding future occupiers from applying for car parking permits.
- 8.171 Subject to appropriate conditions, the proposed development is considered acceptable in terms of, biodiversity, flood risk, SUDs, waste, air quality and contamination.
- 8.172 The Croydon Local Plan sets out a presumption in favour of new housing, with a large number of new homes anticipated to be delivered on windfall sites. The proposed development would amalgamate sites, resulting in an opportunity to secure a proportion of affordable housing. It would provide 22 new affordable homes, and a net increase of 39 market homes of which 69% would have 3 bedrooms. There would be benefits in terms of housing delivery, in particular family sized homes and affordable homes. In order to deliver these benefits, the new buildings would be substantially larger than the existing buildings. The site slopes away from the street, meaning that the impact on the streetscene would be limited, and the main bulk of the buildings would be evident from the centre or the rear of the sites and the neighbouring gardens. The scale of the buildings would result in some harm to the local character and there would be substantial increases in building scale and massing on the sites, however it is the view of officers that the benefits would outweigh that harm. In the planning balance and to conclude, the proposed development is considered to comply with the aims and objectives of the NPPF (2021), London Plan (2021), the Croydon Local Plan (2018) and associated supplementary planning guidance.
- 8.173 For the reasons set out above, this application falls to be determined in accordance with the test under section 38(6) of the 2004 Act, the proposal is in general conformity with the Development Plan overall and there are no material considerations of sufficient weight to justify refusal.
- 8.174 All other relevant policies and considerations, including the statutory duties set out in the Equalities Act 2010, the Human Rights Act, the Planning and Compulsory Purchase Act, and the Town and Country Planning Act, have been taken into account. Given the consistency of the scheme with the Development Plan and weighing this against all other material planning considerations, the proposal is considered to be acceptable in planning terms subject to the detailed recommendation set out in section 2 (RECOMMENDATION).