

1.0 APPLICATION DETAILS

Ref: 21/05015/FUL
Location: 21 Downsview Road | Upper Norwood | SE19 3XD
Ward: Crystal Palace and Upper Norwood
Description: Demolition of existing dwelling house and construction of new replacement building comprising lower ground floor, ground floor, first floor, and second floor, and comprising 9 residential flats with associated vehicle access and off-street parking, cycle storage, refuse storage, and landscaping.
Drawings: 2281(10)100 Rev A; 2281(10)101 Rev B; 2281(11)101 Rev D; 2281(20)100 Rev A; 2281(20)101 Rev A; 2281(20)102 Rev A; 2281(21)100 Rev E; 2281(21)101 Rev B; 2281(21)102 Rev B; 2281(21)103 Rev C; 2281(21)104 Rev B; 2281(30)100 Rev A; 2281(30)101 Rev A; 2281(30)102 Rev B; 2281(31)100 Rev B; 2281(31)101 Rev B; 2281(31)102 Rev B; 2281(31)103 Rev B; 2281(31)104 Rev B; 2281(40)100 Rev B; 2281(40)101 Rev A; 2281(41)100 Rev D; 21-192-005 Rev A; 21.094-BOSK-XX-ZZ-DR-L-1000 P03
Statements: Arboricultural Impact Assessment and Method Statement (September 2021), Basement Impact Assessment (October 2021), Construction Logistics Plan v1.2, Daylight and Sunlight Assessment (September 2021), Design and Access Statement (September 2021), Landscape Strategy (September 2021), Planning Statement (September 2021), Preliminary Ecological Appraisal (September 2021), Surface Water Drainage Assessment (September 2021), Transport Assessment (September 2021)
Agent: Chris Scarr, MortonScarr Architects
Case Officer: Natalie Rowland

	Type of Units				Totals
	One Bedroom	Two Bedroom	Three Bedroom	Five Bedroom	
Existing	0	0	0	1	1
Proposed	4	2	3	0	9

Number of Vehicle Parking Spaces	Number of Cycle Parking Spaces
Nine (9) including two accessible	Eighteen (18) including accessible and visitor

1.1 This application is being reported to Planning Committee in accordance with the following committee consideration criteria:

- Objections above the threshold in the Committee Consideration Criteria;

2.0 RECOMMENDATION

- 2.1 That the Planning Committee resolve to GRANT planning permission subject to the completion of a legal agreement to secure the following:
- A financial contribution of £13,500 for sustainable transport improvements and enhancements.
 - S278 agreement for highway works
- 2.2 That the Director of Planning and Sustainable Regeneration has delegated authority to negotiate the legal agreement indicated above.
- 2.3 That the Director of Planning and Sustainable Regeneration has delegated authority to issue the planning permission and impose conditions and informatives to secure the following matters:

CONDITIONS

Standard

1. Three-year time limit for commencement.
2. Requirement for development to be carried out in accordance with the approved drawings and reports.

Pre-Commencement of Development Conditions

3. Submission and approval of a Construction Management Plan and Construction Logistics Plan.
4. Submission and approval of details of the materials specifications including facing materials, joinery and openings.
5. Submission and approval of cycle and refuse storage details.
6. Submission and approval of details on the Landscaping Strategy including a Biodiversity Enhancement Strategy, landscaping management plan, and details on: boundary treatment design; external walkway screening; play space arrangement equipment, and materials/plantings for hard/soft landscaping.
7. Submission and approval of details of a Sustainable Urban Drainage System.

Pre-Occupation Conditions

8. Submission and approval of details of Electric Vehicle Charging Points.
9. Submission and approval of details of a Waste Management Plan.
10. Submission and approval of details for Lighting Strategy.

Compliance Conditions

11. Compliance with Arboricultural Assessment and Tree Protection Plan
12. Obscure glazing to first and second floor flank windows as shown on proposed south and north elevation plans
13. Compliance with Fire Strategy
14. Provision and maintenance of off-street vehicle parking spaces.
15. Provision of accessible and adaptable dwellings.
16. Compliance with dwelling emissions rate and water efficiency standard.
17. Provision of ultra-low NOx boilers.

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

2.4 That, if within 3 months of the issue of a draft planning permission decision notice, the legal agreement to secure the sustainable transport contribution of £13,500 and other required S278 works has not been completed, the Director of Planning and Strategic Transport has delegated authority to refuse planning permission.

INFORMATIVES

1. Community Infrastructure Levy
2. Code of practice for Construction Sites
3. Highways informative in relation to s278 and s38 works required
4. Compliance with Building/Fire Regulations
5. Construction Logistics Informative
6. Refuse and cycle storage Informative
7. Any other informative(s) considered necessary by the Director of Planning and Strategic Transport

3.0 PROPOSAL AND LOCATION DETAILS



Figure 1 - CGI of front of proposal (eastern elevation)

Proposal

3.1 The application seeks Planning Permission for the redevelopment of the site involving the:

- Demolition of the existing residential dwelling house.
- Erection of 3/4 storey building comprising nine units.

- The building would comprise 4 x 1B 2P units, 2 x 2B 4P units and 3 x 3B 4P units.
- Provision of 9 off street parking spaces including two accessible bays
- Communal and private amenity space, play space and hard and soft landscaping
- Provision of associated refuse and cycle storage.

3.2 From Downsvie Road the proposed building would measure approximately 12.5 meters in height. In response to the gabled roofs found along the street, the building would comprise a front facing front catslide gable, with a secondary set back element. The two front facing dormers are also a common element found particularly along the eastern side of Downsvie Road. A flat roofed addition is proposed to the rear which sits well below the ridge line and would not be visible from the streetscene. The finishing materials would comprise a base formed of brown and white textured brick, a red multi brick on the ground floor level of the front gable with white textured brick elsewhere. The crown hipped roof would be covered in clay tiles with scattered colours.

3.3 Two pedestrian accesses are proposed to the building; steps to the front of the building and an internal set of steps and a lift, which are accessible from the lower ground parking area. Over the course of the application revisions were made to enable those wanting to use the lower ground lift or the stairs, access without having to enter the secure parking area. This is in the form of a separate 'corridor' which leads behind the hit and miss brickwork, visible on the front elevation.

3.4 The unit mix and floor area would be as per the Table below:

		Internal floor area (sqm)	
		Requirement	Proposed
Ground Floor	UNIT 1 (3B5P)	86	100.5
	UNIT 2 (1B2P)	50	56.1
	UNIT 3 (3B5P)	86	109.9
First Floor	UNIT 4 (2B4P)	70	93
	UNIT 5 (1B2P)	50	50.1
	UNIT 6 (3B5P)	86	86
Second Floor	UNIT 7 (1B2P)	50	58.3
	UNIT 8 (1B2P)	50	50
	UNIT 9 (2B4P)	70	70

Figure 2 - Accommodation mix and floor area

- 3.5 The private amenity spaces above first floor are all set within recessed terraces that look out over the tiered planters and rear garden whilst the ground floor amenity spaces to Units 1, 2 and 3 comprise private access to part of the terrace to the rear. The topography is such that these private terraces are set one storey above the entrance forecourt on the sites frontage.
- 3.6 The communal amenity is set to the rear of the site, at the top of the terraced area. This is accessed by a level walkway which leads out from the first floor. A section of this space has been identified as the location for the children's play space, which at 50 sqm exceeds the 17.4 sqm requirement as detailed in the Local Plan.
- 3.7 The proposed bin store is located within the undercroft within close reach of the highway. Long stay cycle storage is also provided in this location with access to the main entrance. Short stay storage is located outside the undercroft.
- 3.8 According to the Arboricultural Report, Canopy Consultancy (September 2021), the proposal would involve the removal of two groups of trees (G1, G2) located to the rear and along the northern boundary respectively, and part of a hedge (H1) along the southern boundary. These trees are not protected. The Report states that there would be a slight incursion into the RPA of T2 due to the retaining wall however over the course of the application, amended plans have been received to ensure that this is not the case.
- 3.9 In mitigation of the loss, 15 trees are being planted around the site.

Site and Surroundings

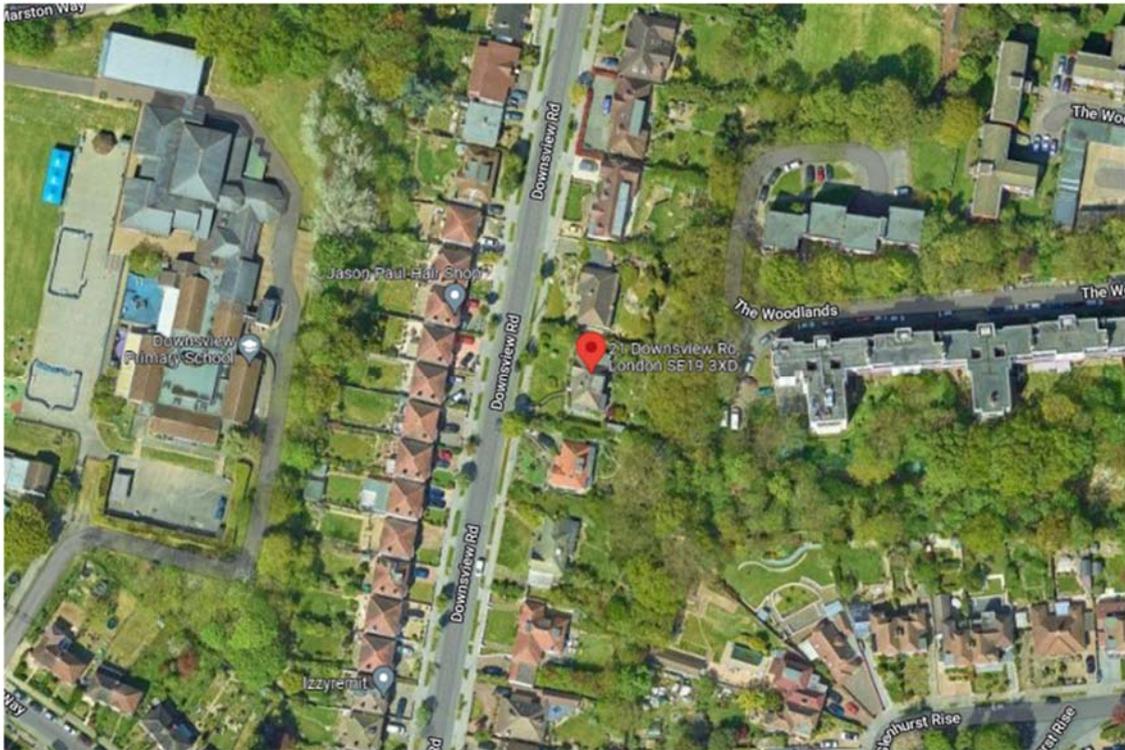


Figure 3 – Google maps view of site

- 3.10 The site is on the eastern side of Downsview Road, approximately 250 meters south from the junction with Beulah Hill. The site is currently occupied by a single storey detached dwelling with front and rear gardens. A single garage lies to the front of the property, inset into the slope and with a dropped kerb providing access from the highway.
- 3.11 The immediate area is primarily residential, with two storey dwellings on similar form and design on the western side of Downsview and single storey dwellings on the east. A number of larger three storey flatted developments lie further to the east (along Woodlands Road). The site immediately to the north (19 Downsview) is currently under construction (see planning history below).
- 3.12 One street tree exists to the front of the site, with a second, immediately to the south west. A lamppost is also situated in the verge to the front.
- 3.13 A number of large established Oak trees lie to the rear of the plot. They are not covered by a TPO however they are to be protected and retained as part of the development.
- 3.14 Land levels within the wider area slope up to the north/north east and on-site rise from west to east. Whilst the site itself is not located within an area at risk of surface water flooding, it is at risk from ground water flooding.
- 3.15 The site does not lie within a Controlled Parking Zone.

Planning History

- 3.16 20/03708/PRE- Proposed demolition of a 5 bedroom detached bungalow. Erection of a new building with 9 flats, 2x one bedroom, 3x two bedroom flats and 4x three bedroom flats with associated landscaping, parking, cycle storage and refuse areas. Advice given.
- 3.17 19/06082/FUL - Demolition of existing dwellinghouse. Excavation of part of site, Erection of two storey (replacement) building with roofspaces and basement/lower ground accommodation comprising 8 flats with associated landscaping, cycle/vehicle parking and waste stores. Application withdrawn
- 3.18 10/03359/P - Subdivision of existing building to provide 2 four bedroom chalet bungalows; erection of single storey side and rear extensions and dormer extensions in front and rear roof slopes and installation of rooflights; formation of vehicular access and erection of garage. Approved on 21/04/2011 but not implemented.
- 3.19 93/02360/P - Alterations to roof. Approved on 15/12/1993
- 3.20 1986 – Single storey side extension
- 3.21 The following planning history for nearby properties is relevant:

1 Downsview Road

- 3.22 22/00438/FUL - Demolition of the existing house and erection of a three storey building containing five flats, with associated parking and landscaping. Not yet determined
- 3.23 19/00411/FUL -Demolition of four bedroom house and creation of one 3bedroom flat, three 2bedroom flats and one 1bedroom flat. With associated parking and landscaping. Approved on 31/05/2019

19 Downsview Road

- 3.24 20/01303/FUL - Demolition of existing dwelling and garage, erection of two storey building (with lower ground and roofspace accommodation) comprising 9 flats with associated parking, amenity space and waste and cycle stores. Approved on 16/07/2020 and currently under construction

27 Downsview Road

- 3.25 22/00195/FUL - Demolition of the existing detached house and replacement with a three storey building containing 8 apartments, with 6 car parking spaces and associated landscaping. Appeal against non-determination lodged.

4.0 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The principle of intensifying the residential use of the existing site to provide a greater quantum of homes than existing is acceptable.

- The design and appearance of the development is acceptable and would evolve the local character whilst using land efficiently. Planning conditions are recommended to ensure that the development would use high quality materials, detailing and landscaping.
- On balance, the living standards for future occupiers would be acceptable, with acceptable light and outlook levels, private amenity space, communal amenity space and child play space.
- The living conditions of adjoining occupiers would be protected from undue harm subject to conditions.
- The level of parking and impact upon the local transport network is considered acceptable subject to conditions and planning obligations.
- The proposal's impact on trees and biodiversity is acceptable subject to conditions.
- Suitable sustainability measures have been included and the development would be zero carbon (partly achieved through planning obligations).
- The proposed flooding and sustainable drainage measures are acceptable subject to conditions.

5.0 CONSULTATIONS

- 5.1 **Ecology Advisor** - No objection subject to conditions securing biodiversity mitigation and enhancement measures.

6.0 LOCAL REPRESENTATION

- 6.1 Seven (7) neighbouring properties were notified of the application and invited to comment. A total of 162 representations were received, of which 140 were objections to the proposal. 22 comments were in favour. Steve Reed MP also objected to the proposal. The concerns raised in the objections received are summarised in Table 6.0, which also contains the Case Officer's response to the objections.
- 6.2 Revisions have been accepted over the course of the application, with a view to addressing transport and tree concerns. None of these revisions were substantial enough to warrant a new consultation period.

SUMMARY OF OBJECTIONS	RESPONSE
Principle of development	
Overdevelopment	Please refer to paragraphs 8.9-8.11 of this report.
Loss of original bungalow	Dwelling is not protected in anyway by virtue of a statutory or local listing and can be demolished.
Houses not flats are required	Planning policies advocate the development of small sites and windfall

	developments such as this, for new residential units in the suburbs. There is no objection to the principle of flatted development in this area.
Design	
Not in keeping	Please refer to paragraphs 8.21-8.31 of this report.
Harmful scale/massing/overbearing	Please refer to paragraphs 8.16-8.20 of this report.
Too much built form	Please refer to paragraphs 8.16-8.20 of this report.
Amenity	
Harm to neighbouring residents mental health	Please refer to paragraphs 8.41-8.58 of this report.
Accommodation will harm future residents mental health	Please refer to paragraphs 8.32-8.38 of this report.
Loss of light	Please refer to paragraphs 8.41-8.58 of this report.
Overlooking to houses on opposite side of road	Please refer to paragraphs 8.53-8.55 of this report.
Inadequate amenity space for future residents and over shadowed	Please refer to paragraphs 8.32-8.38 of this report.
Highways & Parking	
Insufficient car parking	Please refer to paragraphs 8.64-8.66 of this report.
Negative impact on highway safety	Please refer to paragraphs 8.69-8.70 of this report.
Construction impacts (including noise)	Construction impacts are temporary however can be controlled by condition. A Construction Logistics Plan condition can be included to assist in managing and mitigate any impact.
Landscaping	
Loss of trees	Please refer to paragraphs 8.87 of this report.
Other matters	
Infrastructure can't accommodate development	Proposal will be CIL liable.

Legal covenant	Covenants are legal not planning issues.
Impact on ecology/biodiversity	Please refer to paragraphs 8.88-8.91 of this report.
Increased flood risk from impermeable surfaces	Please refer to paragraphs 8.93-8.94 of this report.
Impact on air quality	As a residential site located in a residential location, there is no evidence to suggest that the proposal would result in significant pollution.
Construction works destabilise ground	Surveys will be required as part of the Construction Logistics Plan.
SUMMARY OF SUPPORT	RESPONSE
Necessary to replace energy inefficient bungalows	Noted
Local need for new build flats	Noted
Solves existing subsidence issues	Noted
Appropriate design	Noted

6.3 An objection was received from The Norwood Society, raising the following points:

- Overdevelopment by virtue of height, scale and massing
- Out of keeping
- Poor quality private amenity space
- Harm to privacy of flat 1
- Harm to 23 Downsvie
- Overlooking
- Noise

6.4 An objection was received from the Waddington Way Residents Association, raising the following points:

- Design is out of keeping
- Increased risk of flooding
- Stress on amenities and services
- Increased traffic

6.5 Details of an online petition were received (signed by 1847 individuals), which relates to a wider objection to the redevelopment of bungalows on Downsvie Road rather than specifically to this application.

6.6 The concerns of the local Residents Associations are acknowledged and addressed in the assessment below.

7.0 RELEVANT PLANNING POLICIES AND GUIDANCE

- 7.1 This recommendation to grant planning permission has been taken having regard to the policies and proposals in the London Plan (2021) and Croydon Local Plan (2018), as well as, to all relevant material considerations:

Town and Country Planning Act 1990 (As Amended)

National Planning Policy Framework (2021)

Section 4	Decision Making
Section 5	Delivering a Sufficient Supply of Homes
Section 8	Promoting Healthy and Safe Communities
Section 9	Promoting Sustainable Transport
Section 11	Making Effective Use of Land
Section 12	Achieving Well-Designed Places
Section 14	Meeting the Challenge of Climate Change, Flooding and Coastal Change
Section 15	Conserving and Enhancing the Natural Environment

London Plan (2021)

Policy GG2	Making the Best Use of Land
Policy GG4	Delivering the Homes Londoners Need
Policy D1	London's Form, Character and Capacity for Growth
Policy D2	Infrastructure Requirements for Sustainable Densities
Policy D3	Optimising Site Capacity through the Design-Led Approach
Policy D4	Delivering Good Design
Policy D5	Inclusive Design
Policy D6	Housing Quality and Standards
Policy D8	Public Realm
Policy D11	Safety, Security and Resilience to Emergency
Policy D12	Fire Safety
Policy D14	Noise
Policy H1	Increasing Housing Supply
Policy H2	Small Sites
Policy G4	Open Space
Policy G5	Urban Greening
Policy G6	Biodiversity and Access to Nature
Policy G7	Trees and Woodlands
Policy SI1	Improving Air Quality
Policy SI2	Minimising Greenhouse Gas Emissions
Policy SI4	Managing Heat Risk
Policy SI7	Reducing Waste and Supporting the Circular Economy
Policy SI12	Flood Risk Management
Policy SI14	Sustainable Drainage
Policy T1	Strategic Approach to Transport
Policy T3	Transport Capacity, Connectivity and Safeguarding
Policy T4	Assessing and Mitigating Transport Impacts
Policy T5	Cycling
Policy T6	Car Parking
Policy T7	Deliveries, Servicing and Construction

Policy DF1 Delivery of the Plan and Planning Obligations

Croydon Local Plan (2018)

Policy DM1	Housing Choice for Sustainable Communities
Policy DM10	Design and Character
Policy DM13	Refuse and Recycling
Policy DM16	Promoting Healthy Communities
Policy DM25	Sustainable Drainage Systems and Reducing Flood Risk
Policy DM27	Protecting and Enhancing Our Biodiversity
Policy DM28	Trees
Policy DM29	Promoting Sustainable Travel and Reducing Congestion
Policy SP2	Homes
Policy SP4	Urban Design and Local Character
Policy SP6	Environment and Climate Change
Policy SP7	Green Grid
Policy SP8	Transport and Communication

Other Relevant Policies & Guidance

Optimising site capacity: A design-led approach Consultation draft (GLA – 2022)
Suburban Design Guide SPD (LBC - 2019)
Borough Character Appraisal (LBC - 2015)
Housing SPG (GLA - 2015)
Technical Housing Standards - Nationally Described Space Standard (2015)
Waste and Recycling in Planning Policy Document (LBC, 2015, As Amended)
Character and Context SPG (GLA – 2014)

8.0 MATERIAL PLANNING CONSIDERATIONS

8.1 The main planning issues relevant in the assessment of this application are as follows:

1. Principle of Development
2. Housing Tenure, Mix and Site Optimisation
3. Design and Appearance
4. Housing Quality
5. Impact on Surrounding Neighbours
6. Highways, Parking and Refuse
7. Trees and Landscaping
8. Biodiversity and Sustainability
9. Flood Risk and Sustainable Drainage
10. Fire Safety
11. Other Matters

Principle of Development

8.2 The site's existing use is residential and as such the proposed redevelopment of the site for residential purposes is acceptable. Policy SP2.2 of the CLP states that the Council will seek to deliver a minimum of 32,890 homes between 2016

and 2036, equating to 1,645 homes per year, with 10,060 of said homes being delivered across the borough on windfall sites (i.e. non allocated sites outside of the Croydon Opportunity Area – such as this application site), and equating to 503 homes per year. The LP sets a housing target for Croydon of 20,790 homes between 2019 and 2029, equating to 2,079 homes per year, which includes a “small sites” target of 6,410, equating to 641 homes per year, which is an increase on the Council’s current windfall target. Given the above the principle of intensifying the residential use of the existing site to provide a greater quantum of homes than existing is acceptable.

- 8.3 The existing dwelling is not statutorily or locally listed and therefore there is no objection to its demolition and replacement with a flatted development.
- 8.4 Overall the redevelopment and intensification of the site is considered to be acceptable in principle, subject to the other relevant planning considerations discussed further below.

Housing Tenure, Mix and Site Optimisation

- 8.5 Policies SP2.4 and SP2.5 of the Local Plan state that on sites of ten or more dwellings the Council will seek a minimum of 30% affordable housing. The proposed scheme seeks to provide nine units and as such, there is no affordable housing requirement.
- 8.6 Policy SP2.7 of the Local Plan sets a strategic target for 30% of all new homes up to 2036 to have three or more bedrooms and it is expected that all developments contribute towards this. Policy DM1.2 of the Local Plan states that redevelopment of residential dwellings are acceptable in situations where it does not result in the loss of three bedroom homes or homes as originally built at 130 m².
- 8.7 While the floorplans for the existing property show a five bedroom dwelling, the property has been extended over the years, including the side extension to the north to create two additional bedrooms and the loft extension which created an additional bedroom. As such, the original building is believed to have been a three bedroom property as built.
- 8.8 That said as part of the mix, the proposal seeks to provide 3 x 3 bedroom properties, which represents 33% of the proposed dwellings. Overall, this proposal would result in a net uplift in family housing on the site and would not conflict with this policy.
- 8.9 With respect to the optimisation of the site, Policy D3 of the London Plan (2021) sets out that all development must make the best use of land by following a design-led approach that optimises the capacity of sites. Although only a consultation draft and holding minimal weight, the London Plan guidance document Optimising site capacity: A design-led approach (2022) suggests ways

to optimise site capacity rather than maximising density. This is in part, done by carrying out a detailed site analysis which considers the site context, infrastructure opportunities and constraints, surrounding built form and building height as well as placemaking.

8.10 The Design and Access Statement submitted with the application includes a full analysis of the surrounding area and details how the design and siting of the building is a response to the locality.

8.11 As such, the proposal is considered to comply with Policy SP2.7 of the Local Plan and Policy D3 of the London Plan (2021).

Design and Appearance

8.12 Policies SP4.1 and DM10.1 of the Local Plan state that the Council will require development of a high quality, which respects and enhances Croydon's varied local character and contributes positively to public realm, landscape and townscape to create sustainable communities. Proposals should seek to achieve a minimum height of three storeys, should respect the development pattern, layout and siting; the scale, height, massing, and density; and the appearance, existing materials and built and natural features of the surrounding area.

Layout

8.13 The proposed layout of the development includes the provision of a part three part four storey building (including a lower ground parking level). Five car parking spaces are provided to the front of the building, with an additional four spaces contained within the undercroft of the building, accessed by a new vehicular access from Downsvie Road. Pedestrian access will be via steps to the front of the building or via a secondary internal set of steps and a lift, located within the secure parking area but also with a separate access from the front to allow accessibility for all. A communal garden and child play area is located to the rear of the site, with access from a high level walkway at first floor. With the exception of visitor cycle parking, all other cycle parking and refuse storage is located within the footprint of the building at lower ground level.

8.14 The building has been set back into the site, with a stepped front building line which is entirely appropriate to the surrounding form. It could be argued that there is an 'over engineered' appearance to the front of the plot as a result of the forecourt parking, steps and retaining walls throughout the site. However retaining walls and forecourt parking are defining features of the road, particularly the neighbouring plots and on balance, these elements are considered to be characteristic of the streetscene. Furthermore, additional work has gone into the landscaping proposal across the site. As such, this is acceptable.

8.15 The Local Plan requires all flatted development to provide new child play space on top of the amenity space to be provided for the scheme itself. Child play space is proposed to the rear of the site. With an area of 50 sqm, this accords with the 17.4 sqm requirement detailed in Table 6.2 of the Local Plan.

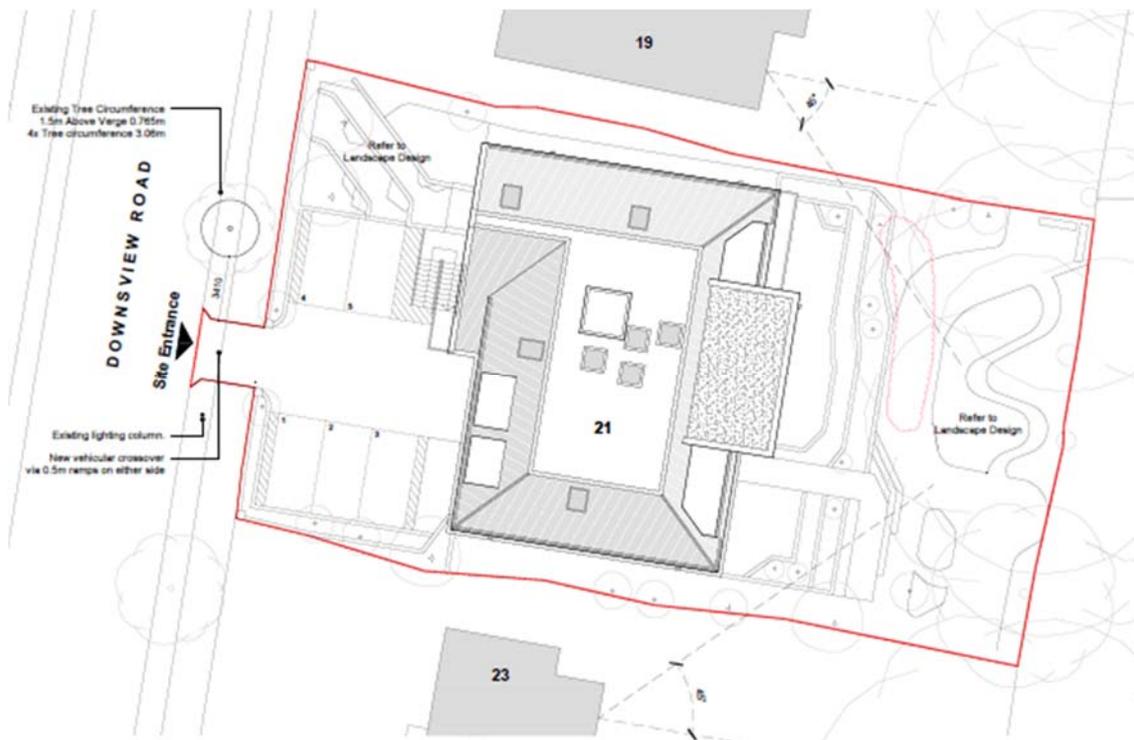


Figure 4 - Proposed site plan

Scale, Height and Massing

8.16 Policy DM10.1b of the Local Plan requires proposals to respect the scale, height and massing of the surrounding area, whilst seeking to achieve a minimum height of three storeys for developments facing onto streets.

8.17 The wider surrounding area contains a mix of single, 1.5 and two storey dwellings. With regards to the immediate locality, the adjacent site

8.18 The proposed development would follow this guidance although as a result of the topography, the building would appear taller from the south. Third party comments were received in relation to this - specifically that the lower ground level results in the appearance of a four storey building. This 'storey' actually accounts for a very small proportion of the floorplan and provides waste and parking facilities. Furthermore, the use of this lower ground area for parking is actually considered to be a feature of the streetscene (see number 17 Downsview Road in figure 6 below) and as such, would not be an alien feature.



Figure 5 - 17 Downsview Road

8.19 The building to the north (number 19) which is currently under construction is a two storey building with accommodation in the roof and a lower ground floor (reference 20/01303/FUL), and is similar to what is being proposed as part of this application (see figure 7 below).



Figure 7 - Proposed Downsview Road street scene

8.20 The height of the proposed is an increase on the existing bungalow however the proposed ridge line still sits below that on number 19. Despite being wider than the existing bungalow, the proposed building retains separation distances of 2.8 meters and 1.8 meters on the northern and southern boundaries respectively. It is also noteworthy that built form spanning the width of the plots is not uncommon; the approved building under construction at number 19, number 17 (as shown in figure 6), number 15, number 11 and number 9 also cover much of the sites frontage due to the buildings having benefitted from extensions over the years. When considered with the design of the roof and the eaves heights, the building is not considered to appear unduly prominent within the street scene.

Appearance and Materials

- 8.21 In order to inform the appearance of the proposed development a character analysis of the local area has been undertaken and the proposal seeks to reference aspects of the surrounding character, such as the material choice and proportions of the fenestration, whilst at the same time introducing aspects of contemporary detailing to ensure that the proposal is not simply a pastiche of surrounding buildings.
- 8.22 The western side of Downsview Road is predominantly made up of detached 1930's dwellings, generally square in plan with pitched clay tile roofs and painted render facades with red brick detailing.
- 8.23 In contrast, the eastern of the road is largely formed of detached single storey bungalow style properties with garages, set back further into the plots. The significant level changes mean that many of these properties sit high up in the plot, above the highway. The majority of these properties have been extended over time, to include dormer windows and accommodation in the roof. As a result of these alterations, the eastern side of Downsview Road exhibits a less defined style and form when compared to the west.
- 8.24 As you travel north, there is a mixture of smaller single storey dwellings that sit below the natural slope of the road, two new 3 and 4-storey apartment block developments further north.
- 8.25 The contextual analysis included within the DAS identifies the protruding gable ends and pitched roofs found on properties in the vicinity. The proposed catslide gable is a contemporary take on this which helps mediate the land levels across the site and adds appropriate visual interest.
- 8.26 With regards to materiality, the red clay tile proposed to the roof is a feature of the surroundings and is appropriate. The white brick with light mortar is an acceptable alternative to the white render also in the locality. The contrasting red brick is an element of detailing which adds further interest to the façade.
- 8.27 At lower ground floor a hit and miss brick panel screen the alternative accessible entrance to the lift, adjacent to the car park entrance.
- 8.28 The use of aluminium windows is acceptable and the Applicant is encouraged to use slim profile frames, with minimum reveal depths of 225mm to give depth to the facade. This can be secured by condition.
- 8.29 The proposal includes an undercroft parking area at ground floor which facilitates four of the parking spaces and the bike and refuse stores. Vehicular access to the undercroft will be through an entrance controlled by a shutter door (access will be by fob and for residents only). A separate pedestrian access door sits to

the side. It is acknowledged that the undercroft (and the parking which is facilitated as a result) allows for landscaping to the front of the plot, which is considered to be a benefit to the scheme. Furthermore as already discussed, due to the topography lower ground parking areas are considered to be a feature of the area.

- 8.30 In order to deter anti-social behaviour, a hit and miss brickwork panel has been introduced to the side of the shutter, which allows light into the secondary entrance stairwell. It is recommended that additional lighting is provided in this area which could be conditioned, as well as full details of the shutter. In order to maximise light into this area, it is requested that the shutter allows some visibility as opposed to being completely obscured. On balance, this is considered an acceptable solution.

Conclusion

- 8.31 Whilst it is recognised that the scale and massing of the proposal would be greater than that which it replaces and many of the surrounding properties, the manner in which the proposal seeks to respond to the local character through respecting the development pattern (through building lines and respecting the existing plot rhythm), and utilising a material palette and detailing which picks up on materials commonly found within the local area, is considered to respect the character of the street.

Housing Quality

- 8.32 London Plan Policy D6 requires housing developments to be of a high quality design and contains space standards for new dwellings. The provision of dual aspect dwellings should be maximised and a single aspect dwelling should only be provided where a more appropriate design solution to meet the requirements of Part B in Policy D3 (optimising site capacity through the design led approach). The design should provide sufficient daylight and sunlight and ensure the usability of outdoor space is maximised.
- 8.33 As detailed in figure 2 and figure 9, all units would meet or exceed the internal floor area and private amenity space standards set out by both the Nationally Described Space Standards (NDSS) and Table 6.2 in the Local Plan and include the necessary storage.
- 8.34 Third party comments were received regarding the quality of the private amenity space for the ground floor units as well as the units themselves, due to the sloping site. The Daylight and Sunlight Assessment confirms that all habitable rooms on the ground floor exceed the value set out by the BRE Guidelines. This guidance is also relevant for considering the quality of the outside space, as it details that the terraces should not breach the 25 degree line. The submitted section drawing (see figure 8 below) shows compliance with this.

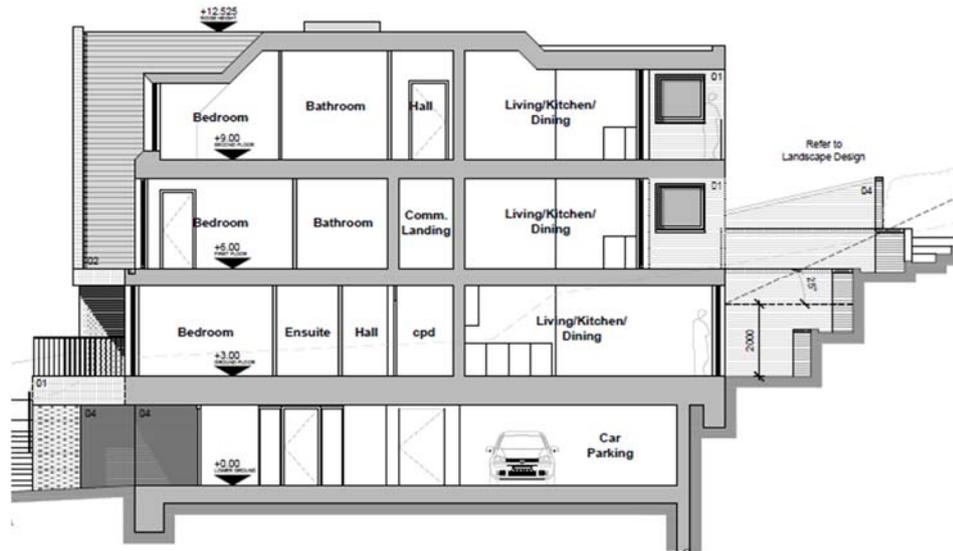


Figure 8 - Proposed section drawing

8.35 While the three one bed units (Units 2, 5 and 8) are single aspect, the submitted Daylight and Sunlight Assessment confirms that they (and all other units) are fully compliant to BRE standards and would provide an appropriate level of accommodation for future occupiers. It is noted that one of the habitable rooms serving Unit 7 falls short of the winter sunlight availability however exceeds annual sunlight hours. The unit also has a secondary habitable room which exceeds the values to ensure that the flat receives sufficient sunlight throughout the year.

		Private Amenity Space (sqm)	
		Requirement	Proposed
Ground Floor	UNIT 1 (3B5P)	7	11.7
	UNIT 2 (1B2P)	5	15.5
	UNIT 3 (3B5P)	7	15.4
First Floor	UNIT 4 (2B4P)	6	7.4
	UNIT 5 (1B2P)	5	5.1
	UNIT 6 (3B5P)	7	8.4
Second Floor	UNIT 7 (1B2P)	5	5.9
	UNIT 8 (1B2P)	5	5.1
	UNIT 9 (2B4P)	6	8.4

Figure 9: Proposed private amenity space

- 8.36 In addition to having practical and comfortable layouts, the proposed dwellings would be located far enough away from neighbouring buildings to benefit from pleasant outlooks and good levels of natural light.
- 8.37 Table 3.2 of Policy D6 details the qualitative design aspects to be addressed in housing developments which includes layout orientation and form (discussed in para 8.11-8.18 above) and the requirements of communal outside amenity space. These include sufficient space for the number of residents, for it to be easily assessable, positioned to allow overlooking, and be designed to support “an appropriate balance of informal social activity and play opportunities for various age groups”.
- 8.38 Much of this is echoed in Local Plan Policy DM10.45 which requires proposals for new flatted development to incorporate high quality communal amenity space. The plans and the submitted Landscaping Strategy show the area to the rear of the site as communal and play space. A walkway leads from the rear of the first floor to the garden space. The majority of this space benefits from a gentle gradient however it is acknowledged that the north eastern corner of the site would not be accessible to all. Bearing in mind the space which is accessible, this arrangement is acceptable.
- 8.39 Details of this walkway, to include a level of screening, will be key to ensure that users of it are not able to look down into the private amenity space of the Units on the ground floor. This would be subject to securing further design detail by condition.
- 8.40 London Plan Policy D7 requires new dwellings to be building regulation M4(2) compliant for use by persons with disabilities, with 10% meeting M4(3). The inclusion of the lift means that all units meet M4(2) requirements. The plans show Unit 4 on the first floor as being M4(3) compliant which is acceptable.

Impact on Surrounding Neighbours

- 8.41 The London Plan (2021) Policy D6 states that “development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.”
- 8.42 Policy DM10.6 of the Croydon Local Plan (2018) states the Local Planning Authority would not support development proposals, which would have an adverse effects on the amenities of the occupiers of adjoining buildings. Policy DM10 of the Croydon Local Plan (2018) and Suburban Design Guide SPD (2019) state that proposals should not negatively impact upon neighbouring properties.
- 8.43 Third party comments were received stating that the proposal would have a detrimental impact on the mental wellbeing of the neighbours. This in itself is not

a planning consideration however it is relevant if the building by virtue of its impact on neighbouring amenity is harming the neighbour's wellbeing. The assessment of the impact on neighbouring properties is as follows -

19 Downsview Road

- 8.44 As mentioned, this site lies to the north and works are underway to implement planning permission 20/01303/FUL.
- 8.45 With regards to the rear building line, in order to ensure that development does not harm the amenity of neighbouring properties through loss of light or overshadowing, the SDG states that the depth of projections should be no greater than 45 degrees as measured from the middle window of the closest ground floor habitable room on the rear wall of the main neighbouring property on both side. The submitted site plan (shown in figure 4) shows compliance in this respect.
- 8.46 The balconies serving Units 4 and 7 will be closest to the boundary with this property (the area serving unit 1 is set into the slope and therefore will not harm neighbouring amenity of this neighbour). The plans show a 1.8 metre screen (which would be required to be obscure glazed by condition) at first floor level, to ensure that occupants would not be provided oblique views of the amenity space serving 19 Downsview Road. The amenity space serving Unit 7 on the second floor would be inset into the roof and as such, would not allow for any harmful overlooking.
- 8.47 One first floor flank window is proposed which serves the living space to Unit 4. The plans show this window to be obscure glazed which is acceptable considering the other openings serving this space on the rear elevation. Two roof lights are also proposed however considering their height, are not considered to result in any harm to privacy.

23 Downsview Road

- 8.48 This neighbouring property lies to the south and is an existing bungalow. As a result of the topography, this property sits lower on the land than the existing property at number 21.
- 8.49 The proposed building will inevitably sit taller than number 23 and has a rear building line which projects further back than that of the neighbouring property. That said, the design and orientation of the building means that the proposal would not breach the 45 degree line when measured from 23 Downsview Road.
- 8.50 The Daylight and Sunlight Assessment has considered the impact of the proposal on the relevant habitable windows serving this property and shows that

all windows would continue to meet BRE guidelines and therefore there would not be a detrimental impact on the light levels to this property.

- 8.51 Louvres have been included on the southern side flank of the balconies serving Units 5 and 8 which assist in maximising light into the units. It is noteworthy that policies in the Local Plan and the SDG do not require the protection of oblique views however the louvres would prevent any oblique views into the rear garden of number 23.
- 8.52 One ground floor and one first floor flank window are proposed to this elevation which serve living space to Units 3 and 5 respectively. The plans also show these windows to be obscure glazed which is acceptable considering the other openings serving this space on the rear elevation.

28, 30 and 32 Downsview Road

- 8.53 These properties lie on the western side of Downsview Road, with their principle elevation facing the site. Due to the topography they also sit lower than the existing bungalow.
- 8.54 The proposed building will clearly be visible from front of these properties however due to the presence of the highway, the facing elevations of these properties are approximately 31-33 meters away. As the site is already in residential use, windows exist which are afforded views of these properties. The proposed development will introduce a larger quantum of openings, however due to the distances involved the proposal complies with the guidance contained within the Suburban Design Guide and BRE guidelines and would not result in a harmful loss of privacy.
- 8.55 As part of the Daylight and Sunlight Assessment, a 'No Sky Line Assessment' was carried out, which looks at the view of the sky which certain rooms have and considers the impact of the development on those views. The assessment was carried out for 24, 28, 32, 34 and 38 Downsview Road, all of which continued to meet BRE guidelines. There is no objection in this regard.

The Woodlands

- 8.56 The Woodlands is a flatted scheme which lies to the east of the site, approximately 40 meters away. Due to the distance involved and the fact it lies on a considerably higher plot, the impact on neighbouring amenity is not considered to be harmful.
- 8.57 Comments were received regarding the noise and disturbance which would result from the intensification of the site. The site has an existing lawful residential use and is situated within a residential area. The proposed development would not result in undue noise, light or air pollution as a result of an increased number of occupants on the site.

Conclusion

8.58 The Daylight and Sunlight study confirms that the proposed development complies with BRE guidance and as such, there will be no adverse harm to the neighbouring properties in this regard. The layout and design of the proposal will not result in an unacceptable amount of overlooking or loss of privacy and complies with London Plan (2021) Policy D6, policies DM10.6 and DM10 of the Croydon Local Plan (2018) and the Suburban Design Guide.

Highways, Parking and Refuse

8.59 Policy SP8 of the Local Plan (2018) is in relation to traffic generation, sustainable travelling and parking standards. Local Plan Policy DM30 seeks to ensure that there is an appropriate level of car and cycle parking for developments

8.60 The site spans across an area with a PTAL of 2 indicating that it has poor access to public transport. The site is not within a CPZ and currently has one existing crossover on Downsview Road which allows vehicular access to the existing garage.

8.61 A Transport Statement (Odyssey dated September 2021) has been submitted in support of the application which suggests that there are no transport planning or highway concerns which should prevent planning permission from being granted.

8.62 Over the course of the application, the Applicant has provided amended plans to overcome issues with highway safety. These include the following points:

- Confirmation that the vehicle access which not interfere with the street tree. Dwg 21-192-005 Rev A confirms that the vehicle access is not within a distance of four times the circumference of the tree which is acceptable with regards to highway safety.
- Confirmation of a separate pedestrian access into the stair core/lift area, meaning that the parking area can be secure.
- Amendments to the cycle parking arrangements to ensure the resident's cycle store is appropriately sized and the provision of separate visitor cycle parking.
- Alteration of the door from the car park to the lift lobby opening into the lobby rather than into the car park.
- Corrected pedestrian splays and vehicle sightlines.
- Extra space for car parking spaces next to retaining walls/boundary treatments.

Access and car parking

- 8.63 Pedestrians would be able to access the main building from the Downsview Road, using the set of steps to the main entrance. Step free access using the lift (and a second set of steps) is also available.
- 8.64 The London Plan and Policy DM30 of the Croydon Local Plan sets out maximum car parking standards for residential developments based on public transport accessibility levels.
- 8.65 Table 10.3 of the London Plan gives a maximum of 0.75 spaces per 1-2 bed unit and 1 space per 3+ bed unit in outer London areas with a PTAL of 2-3. Based on the proposed mix, this would equate to eleven spaces. Nine are being proposed which as a 1:1 provision, is acceptable.
- 8.66 It is important to note that it is not necessarily desirable to provide car parking up to the maximum standards given the requirements of both the London Plan and Local Plan which seek to reduce reliance on car usage and promote/prioritise sustainable modes of transport. As such a lower level of car parking can be supported and is encouraged in line with the ambitions of the Development Plan.
- 8.67 Conditions are also required regarding the submission highways conditions survey of the surrounding footways, carriageway and street furniture prior to the start of any works on site. This would need to be accompanied by photos and a report of any areas which may be of concern.
- 8.68 A Construction Logistics Plan was submitted with the application however further details are required (namely the delivery routes, location of holding areas, details of banksmen and confirmation of crossover discussions). This can be conditioned.
- 8.69 A number of representations have been received which refer to the impact of the development on street parking and highway safety. In respect to highway safety, the access to the site adheres to the necessary visibility splays and pedestrian sightlines which would ensure safe access onto and out of the site. The Transport Statement provides further information as to the proposed trip generation for the development but indicates that the proposed residential development would generate a relatively small increase in overall trips to and from the site, with an increase of thirteen vehicular trips daily. An increase of this nature, could be accommodated within the local highway network without any resultant material impact.
- 8.70 With regards to on street parking, as already highlighted, the 1:1 parking provision is policy compliant.
- 8.71 In compliance with the London Plan, Electric Vehicle Charging Points (EVCP) can be secured by way of a condition.

Sustainable transport contributions

- 8.72 Local Plan Policy SP8.12 outlines that the Council and its partners will enable the delivery of electric vehicle charging infrastructure throughout the borough to improve air quality and decarbonise private transportation over the plan period.
- 8.73 Local Policy SP8.13 continues on to state that new development will be required to contribute to the provision of electric vehicle charging infrastructure, car clubs and car sharing schemes.
- 8.74 A Section 106 Agreement is required alongside this application to secure £1,500/unit towards improvements to sustainable transport including, but not limited to, on street car clubs with EVCP's as well as EVCP's in general, as per policies in the Local Plan. Furthermore, membership of the car club would also be required for each residential unit for a period of 3 years; this would also be secured via S106 agreement. The applicant has agreed to enter into a legal agreement as such.

Cycle provision

- 8.75 In order to encourage the use of cycling as a primary mode of transport, the redevelopment would be required to provide two short-stay cycle parking spaces and sixteen covered and secure long-stay cycle storage spaces as per Table 10.2 of the London Plan (2021).
- 8.76 The cycle store is at ground floor, in the form of two tier bike stands for fifteen cycles and one Sheffield stand. An additional secure store for a wider bicycle, with an additional Sheffield stand is proposed in the rear section of parking, behind the lift core.
- 8.77 Two short stay visitor spaces in the form of a Sheffield stand are in a separate location, adjacent to the bin store. This is acceptable.

Refuse

- 8.78 Policy D6 of the London Plan (2021) requires new housing to provide adequate and easily accessible storage space that supports the separate collection of dry recyclables and food waste, as well as, residual waste. It is supported locally by Croydon's Waste and Recycling in Planning Policy Document (2018) that requires a flatted development of the proposal's size and arrangement to provide enough bins and bin storage space within the curtilage of the property to handle the approximate 140.0l of food waste, 1100l of recycling waste and 1100l of landfill waste that would be generated by the proposed dwellings on a weekly basis.

- 8.79 Refuse storage is shown on the lower ground floor, is within 20 meters of the rear of the refuse vehicle and is accessed by a 2 meters wide door. As per the waste management guidance, a 2 meter footpath is provided in front of the store for collections. A specific 10sqm bulky goods area has not been shown on site however the Applicant maintains that the refuse storage area is oversized and there is space outside the store. The absence of a designated space is not considered to be a reason for refusal and is acceptable.
- 8.80 This recommendation includes a Waste Storage Management condition designed to secure the provision of the requisite facilities and management procedures.

Conclusion

- 8.81 Officers are satisfied that the scheme would not harm the safety and efficiency of the highway network. It is considered the network and transport impacts associated with the developments on traffic and transport would be negligible and it is unlikely to have a significant impact on highway safety.

Trees and Landscaping

- 8.82 Local Plan Policy DM28 states that the Council will protect and enhance the borough's trees and hedgerows by not permitting development that would result in the avoidable loss or excessive pruning of preserved trees or hedgerows or those that make a positive contribution to the character of an area. London Plan Policy G6 seeks development to provide a biodiversity net gain and G7 seeks to ensure trees of value are retained.
- 8.83 An Arboricultural Report (Canopy Consultancy dated September 2021) was submitted in support of the application. The proposal would involve the removal of two groups of trees and part of a hedge. None are protected and there is no objection to the principle of their removal.
- 8.84 The Report states that there would be a slight incursion into the RPA of T2 due to the retaining wall. Over the course of the application, amended plans were requested by the Council to ensure that there would be no incursion. In order to effect this, the top retaining wall has been pulled forward outside of the RPA, which is supported.
- 8.85 The submitted plans and method statement is therefore considered to be acceptable. This recommendation includes a condition designed to ensure compliance with the method statement and related plans.
- 8.86 A detailed Landscape Strategy has been submitted in support of the application (see exert in Figure 10 below) which shows an analysis of the space and the rationale behind the differing landscaped components of the scheme, including

the tiered landscape to the north west corner of the plot; the ground floor amenity spaces serving the ground units; the tiered landscape behind and the rear communal garden with play space to the rear of the plot.



Figure 10 - Exert from Landscaping Strategy

8.87 The Landscape Strategy details the inclusion of 15 trees across the plot, of varying species and sizes to help mitigate against the loss. These would be required by condition, with further details also required regarding the planting schedules, in order to ensure that this area of outdoor space is a visually attractive and stimulating environment of the requisite high quality.

Biodiversity and Sustainability

8.88 Local Plan Policy DM27 outlines that development proposals should enhance biodiversity across the borough and improve access to nature. This should have no adverse impact on species of animal or plant or their habitat protected under British or European law, highlighted within a local/regional biodiversity action plan, or when the council is presented with evidence that a protected species would be affected.

8.89 A Preliminary Ecological Appraisal (The Ash Partnership UK Ltd, September 2021) was submitted in support of the application. The survey concludes that existing habitats on site are all of no ecological value, with plants present which are common and widespread within the UK. The existing built structures are assessed to be unsuitable for bat roosting.

8.90 Having reviewed the submitted information, officers are satisfied that the information is sufficient to determine the likely impacts of development on designated sites, protected species and priority species & habitats. That said, due to the potential for bird nesting on site, a Construction Environment

Management Plan condition will be added to confirm how the woodland and nesting birds will be protected during the construction phase.

- 8.91 The submitted Landscaping Strategy provides some information as to the proposed ecological enhancements including a biodiverse roof, wildflower meadow and other ecological benefits. A condition is requested requiring a full Ecological Enhancement Plan to include the proposals above and an increase in native tree species.
- 8.92 Croydon Local Plan Policy SP6.3 requires all new build residential development of fewer than 10 units to achieve the national technical standard for energy efficiency in new homes set at a minimum of 19% CO2 reduction beyond Part L of the Building Regulations and requiring new build development to meet a minimum water efficiency standard of 110 litres/person/day. Consequently, it is recommended that conditions be imposed to ensure that the development achieves both requirements.

Flood Risk and Sustainable Drainage

- 8.93 In order for the Council to ensure that development within the borough reduces flood risk and minimises the impact of flooding, Policy DM25 of the Local Plan (2018) requires development proposed within areas at risk of flooding development to incorporate flood resilience and resistant measures into the design, layout and form of buildings to reduce the level of flood risk both on site and elsewhere.
- 8.94 A Surface Water Drainage Assessment (Michael Ward dated September 2021) has been submitted in support of the application. The document confirms that as a result of the proposed development, and the incorporation of flow restriction within a new manhole to be constructed on site as well as underground attenuation tanks, the scheme is able to reduce the run-off to a level of 62% less than the existing. This is acceptable.

Fire Safety

- 8.95 Policy D12 of the London Plan (2021) requires all development proposals to achieve the highest standards of fire safety and states that development proposals must identify unobstructed outside spaces for fire appliances to be positioned, incorporate features to reduce risk to life, are constructed appropriately to minimum fire spread, provide means of escape, develop and evacuation strategy, and provide suitable access and equipment for firefighting.
- 8.96 A Fire Statement has been submitted in support of the application (contained within the Design and Access Statement). It confirms that the building will comply with The Building Regulations Approved Document B Volume 1: Dwellings, as well as having mains operated fire detection and alarm systems. All units are

within 7.5m of a protected common stair / stair lobby that leads to a final exit. Furthermore, a fire and rescue vehicle will be able to enter the entrance forecourt directly outside the building. From this point every part of the building is within 45m measured along the distance of the hose of the pumping appliance.

- 8.97 The details provided are sufficient to demonstrate that the development can achieve the highest standards of fire safety and the proposal complies with Policy D12 of the London Plan (2021).

Other Matters

- 8.98 Representations have raised concerns that local services will be unable to cope with additional families moving into the area. The development will be liable for a charge under the Community Infrastructure Levy (CIL). This payment will contribute to delivering infrastructure to support the development of the area, such as local schools.
- 8.99 All material considerations have been taken into account, including responses to the public consultation. Taking into account 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 policy.

Conclusion

- 8.100 The principle of redeveloping and intensifying the residential use on the site is acceptable within this area. The design of the scheme is of an acceptable standard and appropriate in relation to residential amenity, transport, sustainability and ecological matters. Therefore, it is recommended that planning permission be **GRANTED**.