

**PART 6: Planning Applications for Decision**

**Item 6.2**

**1.0 SUMMARY OF APPLICATION DETAILS**

Ref: 20/05370/FUL  
 Location: 5 Smitham Downs Road, Purley  
 Ward: Coulsdon Town  
 Description: Demolition of existing dwelling, the construction of a part 4 / part 5 storey residential building accommodating 20 flats, all together with vehicular accesses from Smitham Downs Road and The Vale, vehicle and cycle parking, refuse provision and associated hard and soft landscaping.  
 Drawing Nos: 0102 Rev A ; 0103 Rev A ; 0104 Rev A ; 0105 Rev A ; 0250 Rev A ; 0251 Rev A ; 0252 Rev A ; 0253 Rev A ; 0254 Rev A ; 0255 Rev A ; 0453-E04 Rev A ; 0503-Visual-03 Rev A ; 0602 07 Zones by Apartment Units Rev A ; 0501-Visual-01 ; 0502-Visual-02 ; 0370-Detail Sheet 01 ; 0371-Detail Sheet 02 ; 0450 ; 0450 A ; 0451 ; 0451 A ; 0452 ; 0452 A ; 0453 ; 0256 ; 0200 ; 0400 ; 0401 ; 142-GA-100 ; 0350 ; 0351 ; 0352 ; 0353 ; 0354 ; 0100 ; 0101 ; 0454 ; 0455.  
 Applicant: C And H Projects (1A) Ltd  
 Case Officer: D Gibson

**Residential Accommodation**

	1 bedroom	2 bedroom	3 bedroom	Total
Existing	0	0	1	1
Proposed Market Housing	5	2	10	17
Proposed Affordable Housing	1 (London Living Rent)	1 (London Affordable Rent)	1 (London Affordable Rent)	3
Total Proposed	6	3	11	20

**Car Parking and Cycle Storage Provision**

Car Parking Spaces	10 (including 2 disabled spaces)
Cycle Spaces	40 (including 2 visitor spaces)

- 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.
  - Referral from Ward Councillor (Cllr Luke Clancy).

## 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:

- Affordable housing: 2 x London Affordable Rent units (1x2b/3p and 1x3b/4p), 1 x London Living Rent unit (1x1b/2p).
- Affordable housing early and late stage review mechanisms
- Carbon offset contribution of £8,939.10
- Air Quality Monitoring contribution of £2,000
- Sustainable transport contribution of £20,000
- Local Employment Training Strategy contribution of £7,500
- Monitoring fees as appropriate
- Any other planning condition(s) considered necessary by the Director of Planning and Strategic Transport.

2.2 That the Director of Planning and Strategic Transport is delegated authority to issue a Grant of planning permission subject to the following conditions and informatives :-

1. Development to be implemented within three years.
2. In accordance with the approved plans.

### Pre-Commencement Conditions

3. Submission of full Construction Environmental Management Plan / Construction Logistics Plan to Council for approval prior to commencement of demolition/construction works.
4. Submission of environmental and historical site review for contaminated land for approval prior to commencement of demolition/construction works and any remedial works to be undertaken as necessary.
5. Submission of calculation for unregulated carbon emissions and how they will be reduced

### Pre-Commencement Conditions (except for demolition and below slab level works)

6. Details of external facing materials junctions, typically at 1:10/1:20
7. Full details of soft and hard landscaping (ensuring minimum urban greening factor score of 0.4), including new tree planting and biodiversity enhancements, and children's play space and boundary treatment to be submitted for approval and retained as appropriate thereafter.
8. A Biodiversity Enhancement Strategy for Protected and Priority species shall be submitted to and approved in writing by the local planning authority.

### Pre-Occupation Conditions

9. A lighting design scheme for biodiversity shall be submitted to and approved in writing by the local planning authority. The scheme shall identify those features on site that are particularly sensitive for bats.
10. Following details to be submitted to Council for approval and prior to first occupation of dwellings : finished floor levels ; security lighting

- (siting/mmanufacturer) ; PV roof panel (dimensions/mmanufacturer) ; visibility splays to car park accesses ; full details electric charging point/s for car parking and cycle storage ; car park management plan.
11. Following to be provided as specified in application prior to first occupation of new dwellings: refuse storage; cycle storage; parking areas.
  12. Development to meet energy efficiency/carbon reduction targets as appropriate.
  13. Details of Secure by Design Accreditation to be submitted to Council for approval.
  14. Submission of full Delivery and Servicing plan.

#### Compliance Conditions

15. Development to adhere to actionable measures of arboriculture report and tree protection measures set out in submitted arboriculture report.
  16. Implementation and adherence to actionable measures of Flood Risk Assessment submitted with application.
  17. Implementation and adherence to actionable measures of Air Quality Assessment submitted with application.
  18. Implementation / adherence as appropriate to actionable measure of ecological report.
  19. External facing materials to be implemented and retained as specified in accordance with submitted drawings and documents.
  20. Development to meet 105 litre per person/day water use target.
  21. No windows/openings to be provided to western flank elevation other than as shown on approved plans.
  22. All dwellings to meet accessibility standards as appropriate.
  23. Any other planning condition(s) considered necessary by the Director of Planning and Strategic Transport.
- 2.3 That, if within 3 months of the issue of a draft planning permission decision notice, the legal agreement has not been completed, the Director of Planning and Strategic Transport has delegated authority to refuse planning permission.

#### Informatives

1. Granted subject to a Section 106 Agreement
2. Community Infrastructure Levy
3. Code of practice for Construction Sites
4. Highways informative in relation to s278 and s38 works required
5. Compliance with Building/Fire Regulations
6. Thames Water informative regarding surface water attenuation and ground water discharge.
7. Any other informative(s) considered necessary by the Director of Planning and Strategic Transport

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

- 3.1 The proposal is an application for full planning permission:
- 3.2 The proposal includes the following:
  - Demolition of the existing house on site.

- Erection of a terrace of part 4 / part 5 storey apartment block comprising 20 flats.
  - Provision of 10 off-street parking spaces (includes 1 disabled space).
  - Provision of associated covered cycle storage and covered refuse storage.
  - Provision of a communal external amenity space.
- 3.3 During the course of the application amended plans have been received. Amendments were made to the internal layouts of the accommodation in order to provide more 3 bedroom dwellings in the scheme. The number of 3 bedroom dwellings was increased from 7 to 11 in number. To facilitate this the number of 2 bedroom dwellings decreased from 7 to 3 in number. The number of one bedroom dwellings, 6 in total, remains the same. The overall number of proposed dwellings, 20 in total, and floor area is unchanged. As the alterations are internal ones they did not constitute material changes to the proposed scheme so re-consultation did not take place.

### **Site and Surroundings**

- 3.4 The site is a corner plot at the intersection of Smitham Downs Road and the Vale and has a gross area of 1,325 square metres. It comprises a two storey arts and craft style 3 bedroom detached house (with two study rooms) of 311 square metres that faces north onto Smitham Downs Road and backs onto The Vale. There are two off-street parking hardstanding areas, one accessed via a vehicle crossover from Smitham Downs Road, and the other accessed from a gated vehicle crossover via the Vale. There is an extensive tree line/hedgerow along the southern boundary of the site. The plot is set on a steep incline that slopes down from east to west.
- 3.5 The site is bounded to the west by 7 Smitham Downs Road, which is a two storey detached care home (for the elderly). The surrounding area is residential in character predominantly formed of large detached dwelling houses. The site is approximately 760 metres walking distance from the northern edge of Coulsdon District Centre.
- 3.6 The site has a Transport for London Ptal rating of 2 and on-street parking is available. The nearest railway stations to the site are Coulsdon Town and Reedham, approximately 1,000m south and north of the site respectively. The nearest bus stops are located on Smitham Downs Road, some 100m south of the site, and are served by route 434. Additional services are available at the stops on the A23, Brighton Road.

Figure 1 – Site Location



### **Relevant Planning History**

- 3.7 20/01294/PRE - Pre-application for re-development of site for flatted development.
- 3.8 16/05770/FUL - Demolition of side extension. Erection of a detached five bedroom dwelling house together with new vehicular/pedestrian access off Smitham Downs Road.  
19/01/2017 - Granted Planning Permission (not implemented).
- 3.9 16/00846/P - Erection of a detached five bedroom house at side; provision of associate parking and provision of vehicular access.  
11/04/2016 - Refused Permission on the following grounds of a cramped development, out of keeping with the character of the surrounding area and detrimental to the street scene. This decision was appealed and dismissed.

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

- The principle of a residential development is acceptable given the national and local need for housing and the existing residential status of the land.
- The proposal meets the minimum affordable housing requirement on site and includes 11 three-bedroom family unit dwellings.
- The design and appearance of the development is appropriate. Whilst it is acknowledged that the development would be a contemporary re-interpretation scheme, the form, height and massing of the building would take character references from the existing fabric of the site and from the surrounding houses and its overall form, massing and height be in context with the overall size of the site.
- The living conditions of adjacent occupiers would be protected from undue harm due to the layout and design of the building and subject to conditions.
- The living standards of future occupiers are satisfactory (in terms of overall residential quality) and would comply with the Nationally Described Space Standard (NDSS).
- The amount of off-street parking would be acceptable. The site is also within a short walk of local bus routes, and Reedham and Coulsdon railway stations,

and is a short bus ride to local shops and services in Coulsdon and Purley District Centres.

- Sustainability aspects have been properly assessed and their delivery can be controlled through planning conditions.

## 5.0 CONSULTATION RESPONSE

- 5.1 Environment Agency: No response.
- 5.2 Lead Local Flooding Authority (LLFA): The LLFA have no objection to the scheme.
- 5.3 Thames Water: No objection. General surface water attenuation and ground water discharge information they advise of can be passed onto the developer through an informative.
- 5.4 Place Ecology: No objection subject to securing biodiversity mitigation and enhancement measures. Recommended as condition 8, 9 and 18.
- 5.5 The views of the Planning Service are expressed in the MATERIAL PLANNING CONSIDERATIONS section below.

## 6.0 LOCAL REPRESENTATION

- 6.1 The application has been publicised by way of 14 letters of notification to neighbouring properties in the vicinity of the application site and erection of a site notice.
- 6.2 The number of representations received from neighbours in response to notification and publicity of the application are as follows:
- No of individual responses: 290    Objecting: 287    Supporting: 3
- 6.3 The following issues were raised in representations. Those objections that are material to the determination of the application, are addressed in substance in the MATERIAL PLANNING CONSIDERATIONS section of this report:

### **Summary of Objection Comments**

Objection	Officer Comment
<b>Housing</b>	
<b>1. Character does not achieve policy objectives / not an intensification area.</b>	See paragraphs 7.4, 7.5, and 8.2 to 8.6, and 8.12 to 8.14 below.
<b>2. Lack of affordable housing.</b>	See paragraphs 8.7 to 8.8 below.
<b>3. Loss of family housing.</b>	See paragraphs 8.9 to 8.10 below.
<b>Townscape</b>	
<b>4. Overdevelopment</b>	See paragraphs 8.3 to 8.6, and 8.11 to 8.18 below.
<b>5. Out of character</b>	

Amenity of Adjacent Residents	
<b>6. Loss of outlook</b> <b>7. Loss of privacy</b> <b>8. Loss of light</b>	See paragraphs 8.24 to 8.28 below.
<b>9. Increased noise</b>	See paragraphs 8.29 and 8.30 below.
Amenity of Future Occupiers	
<b>10. Inadequate size of flats</b> <b>11. Inadequate amenity space</b>	See paragraphs 8.19 to 8.23 below.
Transport and Highways	
<b>12. Increased traffic</b> <b>13. Increased parking</b> <b>14. Highway safety / nearby school.</b> <b>15. Effect of construction traffic.</b>	See paragraphs 8.31 to 8.39 below.
Trees and biodiversity	
<b>16. Effect on trees</b>	See paragraphs 8.45 and 8.48 below.
Other Matters	
<b>17. Flood Risk</b>	See paragraph 8.41 below.
<b>18. Air Pollution</b>	See paragraph 8.49 below.
<b>19. Inaccurate description of development.</b> <b>20. Inconsistent site areas.</b>	The information and drawing submitted describe the proposal. The site area measured by officers is 1325 square metres.
<b>21. Lots of empty flats in Purley.</b>	This is not a material planning consideration.
<b>22. Effect on property value.</b>	This is not a material planning consideration.

### Summary of Supporting Comments

#### 1. Will provide affordable housing

Coulsdon West Residents Association objected, raising the following (summarised) concerns:

- Inaccurate description of development.
- Height out of character.
- Increased traffic.
- Traffic hazard.

Purley and Woodcote Residents Association objected, raising the following (summarised) concerns:

- Loss of family house / non-provision of family housing.
- Overdevelopment.
- Out of character.

- Loss of privacy.
- Loss of light.
- Inadequate car parking.

6.4 Councillor Luke Clancy has objected and referred this application on the following planning related grounds:

- Overdevelopment.
- Height.
- Scale.
- Massing.

## **7.0 RELEVANT PLANNING POLICIES AND GUIDANCE**

7.1 In determining any planning application, the Council is required to have regard to the provisions of its Development Plan so far as is material to the application and to any other material considerations and the determination shall be made in accordance with the plan unless material considerations indicate otherwise. The Council's adopted Development Plan consists of the London Plan 2021, the Croydon Local Plan 2018 and the South London Waste Plan 2012.

7.2 Policy H1 of the London Plan 2021 sets out ten-year net housing completion targets for which boroughs should plan. The ten-year overall housing completion target set for Croydon is 20,970 new homes (2019-2029).

7.3 Policy H2 of the London Plan 2021 states that boroughs should pro-actively support well-designed new homes on small sites (below 0.25 hectares in size) through both planning decisions and plan-making in order to amongst other things:

- 1) significantly increase the contribution of small sites to meeting London's housing needs
- 2) diversify the sources, locations, type and mix of housing supply
- 3) support small and medium-sized housebuilders
- 4) achieve the minimum housing completion targets set out for small sites and overall housing.

The ten-year target small site housing completion set for Croydon is 6,410 new homes.

7.4 The small sites housing target for Croydon (641 homes a year) is not dissimilar to but slightly larger the current adopted 2018 Croydon Local Plan target of 592 homes on windfall (small sites) sites each year.

7.5 It is important to note that in the London Plan 2021, the overall housing target per annum of 2,079 new homes (2019 – 2029) as compared with 1,645 in the Croydon Local Plan 2018. Therefore, Croydon is required to deliver more new homes than our current Croydon Local Plan 2018.



7.6 For clarity, London Plan 2021, the Croydon Local Plan 2018, and South London Waste Plan 2012 are the primary consideration development plans when determining planning applications.

7.7 Policy H1 of the London Plan 2021 recognises the pressing need for more homes in London and Policy H10 promotes a varied housing mix to provide different sizes and types of dwellings in the highest quality environments. The impact of the London Plan 2021 is set out in paragraph 7.2 to 7.4 above.

7.8 Government Guidance is contained in the National Planning Policy Framework (NPPF), issued in February 2019. The NPPF sets out a presumption in favour of sustainable development, requiring that development which accords with an up-to-date local plan should be approved without delay. The NPPF identifies a number of key issues for the delivery of sustainable development, those most relevant to this case are:

- Achieving sustainable development;
- Making effective use of land;
- Delivering a sufficient supply of homes;
- Promoting healthy and safe communities;
- Promoting sustainable transport.

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

7.10 London Plan 2021

- GG1 Building Strong and Inclusive Communities
- GG2 Making the Best Use of Land
- GG3 Creating a Healthy City
- GG4 Delivering the Home London Needs
- GG6 Increasing Efficiency and Resilience
- D1 London's Form Character and Capacity for Growth
- D2 Infrastructure Requirement's for Sustainable Densities
- D3 Optimising Site Capacity Through the Design-Led Approach
- D4 Delivering Good Design
- D5 Inclusive Design
- D6 Housing Quality and Standards
- D7 Accessible Housing
- D10 Basement Development
- D11 Safety, Security, and Resilience to Emergency
- D12 Fire Safety
- D14 Noise
- H1 Increasing Housing Supply
- H2 Small Sites
- H4 Delivering Affordable Housing
- H5 Threshold Approach to Applications
- H6 Affordable Housing Tenure
- H7 Monitoring of Affordable Housing

- H8 Loss of Existing Housing
- H10 Housing Size Mix
- E11 Skills and Opportunities for All
- G1 Green Infrastructure
- G4 Open Space
- G6 Biodiversity and Access to Nature
- G7 Trees and Woodland
- SI 1 Improving Air Quality
- SI 2 Minimising Greenhouse Emissions
- SI 4 Managing Heat Risk
- SI 5 Water Infrastructure
- SI 12 Flood Risk Management
- SI 13 Sustainable Drainage
- T1 Strategic Approach to Transport
- T2 Healthy Streets
- T4 Assessing and Mitigating Transport Impacts
- T5 Cycling
- T6 Car parking
- T6.1 Residential Parking
- T7 Deliveries, Servicing and Construction
- DF1 Planning Obligations

#### 7.11 Croydon Local Plan 2018

- SP1 Place
- DM37 - Coulsdon
- SP2 Homes
- DM1 Housing choice for sustainable communities
- SP4 Urban design and local character
- DM10 Design and character
- DM13 Refuse and recycling
- SP6 Environment and climate change
- SP6.3 Sustainable design and construction
- DM23 Development and construction
- DM25 Sustainable drainage systems and reducing flood risk
- DM27 Biodiversity
- DM28 Trees
- SP8 Transport and communications
- DM29 Promoting sustainable travel and reducing congestion
- DM30 Car and cycle parking in new development

#### 7.12 There is relevant Supplementary Planning Guidance as follows:

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

## 8.0 MATERIAL PLANNING CONSIDERATIONS

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

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

### **Principle of Development**

#### **New Housing**

8.2 This application must be considered against a backdrop of significant housing need, not only across Croydon, but also across London and the south-east. All London Boroughs are required by the London Plan 2021 to deliver a number of residential units within a specified plan period. Croydon's overall housing target per annum is 2,079 new homes (2019 – 2029). The Croydon Local Plan 2018 states there is a requirement to deliver a minimum of 32,890 new homes between 2016 and 2036 (Croydon's actual need identified by the Croydon Strategic Housing Market Assessment would be an additional 44,149 new homes by 2036, but as there is limited developable land available for residential development in the built up area, it is only possible to plan for 32,890 homes). This requirement is set out in policy SP2.2 of the Croydon Local Plan (CLP) (2018), which separates this target into three relatively equal sub targets with 10,760 new homes to be delivered within the Croydon Opportunity Area, 6,970 new homes as identified by specific site allocations for areas located beyond the Croydon Opportunity Area boundary and 10,060 homes delivered across the Borough on windfall sites. In order to provide a choice of housing for people in socially-balanced and inclusive communities in Croydon, the Council will apply a presumption in favour of sustainable development of new homes.

8.3 This presumption includes the Place area of Coulsdon, which is identified in the 'Places of Croydon' section of the CLP (2018) as being an area for '*An area of moderate residential growth based on available land will be focussed on the District Centre and its surrounding area with a new residential community, delivered in Cane Hill. Residential development will respect the existing character and local distinctiveness*'. The Croydon Suburban Design Guide (2019) sets out how suburban re-development can be achieved to high quality outcomes and thinking creatively about how housing can be provided on existing residential sites. As is demonstrated above, the challenging targets will not be met without small windfall sites coming forward, in addition to the large developments within Central Croydon and on allocated sites.

- 8.4 The London Plan 2021 Policy D2 on Small Sites advises that for London to deliver more of the housing it needs, small sites (below 0.25 hectares in size) must make a substantially greater contribution to new supply across the city. Therefore, increasing the rate of housing delivery from small sites is a strategic priority. Achieving this objective will require positive and proactive planning. The density of the site would equate to 490 habitable rooms per hectare. The London Plan Policy D3 does not set out specific density ranges for new development. Instead, it requires new development to optimise site capacity through a design-led approach. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site. Higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling. Officers consider that the density of the scheme would be appropriate and that the proposed development has taken a design-led approach.
- 8.5 The locality is predominantly formed of large residential plots with large detached houses and is generally seen as an acceptable location in principle for intensive residential development of a minimum of three storeys height as sought by policy.
- 8.6 The application is for a residential development providing new and additional homes within the borough, which the Council is seeking to provide. The site is located within an existing residential area and as such providing that the proposal accords with all other relevant material planning considerations, the principle of development is supported.

#### **Affordable Housing and Housing Mix**

- 8.7 Affordable Housing: Policy SP2 of the CLP (2018) states that to deliver affordable housing in the Borough on sites of ten or more dwellings, the Council will negotiate to achieve up to 50% affordable housing, subject to viability and will seek a 60:40 ratio between affordable rents homes and intermediate (including shared ownership) homes unless there is an agreement with a Registered Provider that a different tenure split is justified. CLP Policy SP2.5 requires a minimum provision of affordable housing to be provided preferably as a minimum level of 30% affordable housing on the same site as the proposed development.
- 8.8 A full viability appraisal accompanied the submitted documents for the planning application which concluded that the development would not be viable to provide any affordable housing within the development or make any financial contributions to affordable housing to the Council. This was agreed through an independent viability assessment. However the applicant has offered 15.25% of the development as affordable housing (by habitable room) to be provided in-line with policy SP2.5 with a 66% and 33% split between London Affordable Rent and London Living Rent, which is close to the 60:40 split required by SP2.4. Therefore, the s106 would secure three of the units for on-site affordable housing provision, which is more than the site specific viability assessment indicates can be supported. This is therefore considered to be the maximum reasonable amount which can be secured. The affordable housing amount

secured will be subject to early and late stage review mechanisms as appropriate.

- 8.9 Policy SP2.7 seeks to ensure that a choice of homes is available to address the borough's need for homes of different sizes. It sets a strategic target for 30% of all new homes up to 2036 to have three or more bedrooms and for the type of development proposed in this location Policy DM1.1 requires a minimum provision of 60% of the proposed accommodation to have 3 bedrooms or more. Policy DM1.2 states the Council will permit the redevelopment of the residential units where it does not result in the net loss of 3 bedroom homes (as originally built) or the loss of homes smaller than 130m<sup>2</sup>. In terms of character the Council's Suburban Design Guide (SDG) advises that *'The built character of an area is not defined by the people who live there, but rather the physical characteristics that it is composed of. Character can change over time and it should be acknowledged that well-designed proposals can have a positive effect on an area. This means that new types of dwelling can be integrated into an existing community'*. Therefore, the definition of character would not preclude new 'contemporary re-interpretation' housing development within a residential area.
- 8.10 The development would result in a net increase of 3 bedroom dwellings on the site and the existing house has a floor area of 311 square metres. The development proposes 20 flats and a unit mix comprising 6 x 1 bedroom (30%) flats, 3 x 2 bedroom flats (15%), and 11 x 3 bedroom flats (55%). The proposal would make provision for 55% of the accommodation as family (3 bedroom) accommodation. This would exceed the strategic target of 30% for family homes set out in policy, but would fall short of the 60% required by Policy DM1.1 of the CLP. However, the shortfall is relatively minor in the context of the overall development. The proposed development would also provide a mix of accommodation for different household sizes. Therefore, the amount of family accommodation proposed and mix of accommodation is, on balance, considered acceptable and moreover would exceed the strategic target.

#### **Townscape and Visual Impact**

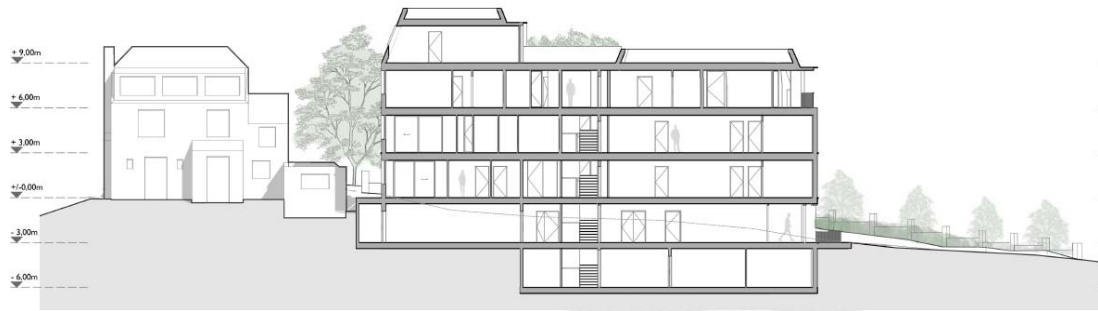
- 8.11 The house, site and area is not subject to any heritage designations so there is no objection to its demolition.

Figure 2. CGI View from Junction Smitham Downs Road / The Vale



- 8.12 On optimising sites the Suburban Design Guide (SDG) advises that in order to make efficient use of sites new development should ensure they make the best use of the site. This may include the provision of higher density housing such as flats. It further advises that new development should seek to evolve the character in a manner that enhances the neighbourhoods as enjoyable places to live, work and play in. This can be achieved through pursuing development that references and reinforces existing architectural styles or introduces new well-designed architectural styles that add interest to the area. This does not exclude increased building sizes.
- 8.13 The proposed development would be sited within a prominent corner location at Smitham Down Road and The Vale. These roads are predominantly formed of detached houses. The application site is unusual in the existing development pattern because it has a frontage facing Smitham Downs Road, but its rear backs onto The Vale, and so it consequently has a much larger plot than other houses in these roads. The only other nearby property with such an arrangement is the care home at 7 Smitham Downs Road, which is directly adjacent to the west of the site.
- 8.14 In line with the principles set out by the Suburban Design Guide (SDG) the location and site circumstances (i.e. its prominent corner location) provide the opportunity to create a marker point within the townscape by accommodating additional height and depth in a new development. The proposal aims to respond accordingly by proposing additional height as well as utilizing the depth and steep gradient of the site to create a layout of building which fronts onto both its northern and southern boundaries. Whilst the proposal is noted to be 4 and part 5 storey in height, in this case the proposed basement and lower ground floors would be concealed and not fully visible from the street and the height of the building would follow the natural upward incline of the site. The main 4 storey mass of the building would terminate with an asymmetrical apex to reflect the prow shaped form of the site towards the east and the height of the proposed building would also be distinguished through the folded form of the roof and contemporary detailing, which again would help to create a marker point within the townscape. Therefore, the overall massing and height of the proposed development would sit well in the street scene.

Figure 3. Section Illustration



- 8.15 The recessed middle section of the proposed building to its northern and southern elevations would help to break down the overall massing of the building and its overall roof form and mass. Karma white multi-tonal (soft Waterstruck texture) bricks are proposed to the base of the proposed building, while grey Marley Fire Sienne tiles are proposed at first floor and above. The contemporary detailing also includes aluminium window frames, recessed gutters, and eaves without overhangs. The proposed use of full depth projecting picture window and recessed balconies with metal upright railing balustrades would provide a robust design that would be well integrated in the form and modern appearance of the building and which would add further relief to the massing of the building as well as visual interest. Therefore, it is considered that the architectural expression of the proposed building and its contemporary re-interpretation approach to character is acceptable and would result in a high quality finish to the building.

Figure 4. CGI View Looking East / South-East down Smitham Downs Road



- 8.16 The scheme proposes two forecourts and two parking areas at ground level and this would provide active frontages to both Smitham Downs Road and The Vale and would be in keeping with its existing development pattern. The division

of the parking areas also means that hardstanding would not dominate the areas around the proposed building. The communal garden and landscaped area (with indicative tree planting) would be sited to the east of the building and would provide a large separation distance from the proposed building to the junction point of Smitham Downs Road and The Vale, in much the same way the existing house on site does. Some of the existing perimeter hedgerow to The Vale will be removed as part of the proposal and would be replaced by 1.2 to 1.8 metre native mixed hedging and 7 replacement trees. An additional 7 trees are also proposed on the Smitham Downs Road perimeter. As well as a central communal amenity and children's play area, there are also smaller more intimate areas and a wildflower meadow proposed within the landscaping. Therefore, the proposed landscaping scheme would offer a variety of different spatial experiences, which would cater for multiple users. Provision for children's play space and wildflower meadow is made within the landscaping. The landscaped amenity areas will be on differing land levels (ground and lower ground levels) due to the topographical constraints of the site, however, a 45 square metre area of hardstanding central to the landscaping scheme can be accessed from a corridor at ground floor. Generally, the provision of the landscaped area and planting to the perimeter to this location is positive as it would provide a spacious and pleasant green aspect in relation to the junction.

Figure 5. CGI of Landscaped Communal Terrace / Garden & Site Layout



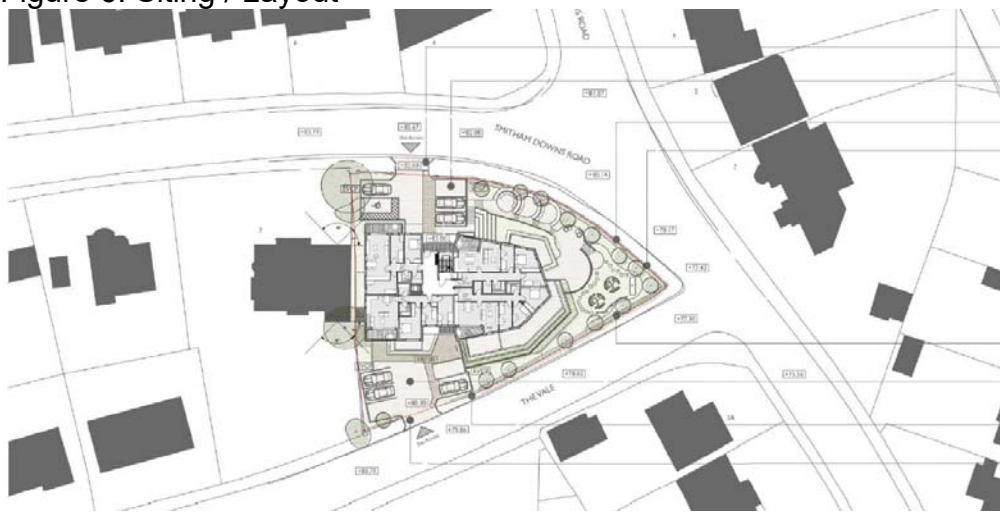




square metres area) to be provided at ground floor level and lower ground floor level as detailed earlier in this report and the area proposed would be able to accommodate children's' play space to the minimum amount of 63.9 square metres area as required for the number and type of accommodation proposed.

- 8.20 The London Plan Policy D7 states that new development must ensure that 10% of new dwellings within a scheme (which are created via works to which Part M volume 1 of the Building Regulations applies) must meet Building Regulation requirement M4 (3) 'wheelchair user dwellings'. All other dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) must meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'. Policy SP2.8 of the CLP (2018) states that the Council would ensure that new homes in Croydon meet the needs of residents over a lifetime.

Figure 6. Siting / Layout



- 8.21 The proposed building would be provided with one lift core allowing for step-free access to be provided up to the second floor. The flats 15 and 16 are split-level flats sited between the second/third floors and would be accessed from the second floor. These units can be considered as Part M4(2) under the building regulations owing to the potential future proofing of the units via a private lift in each unit. This situation is no different to Part M4(2) requirements for a 2 or 3 storey house nor a duplex flatted unit. The relevant section of the Approved Document Part M4(2) Paragraph 2.23 explains access provisions for users who may need to adapt their residence to allow people to move between storeys, through for example installation of a stair-lift.
- 8.22 The proposal is therefore able to meet the London Plan policy for M4(2) and proposes two M4(3) accessible dwellings, both of which would be provided with a parking space.
- 8.23 Matters relating to D12 of the London Plan will be picked up in the addendum.
- 8.24 Overall, the proposed development could provide an interesting and pleasant place to live for future occupiers. The proposed landscaped communal garden areas would provide opportunity for further recreational use for the residents

and could assist in providing community cohesion. The provision of extensive hedgerow and tree planting to the perimeter of the site would also contribute to a pleasant public realm.

### **Residential Amenity for Neighbours**

- 8.25 Policy DM10.6 states that the Council will not support development proposals which would have adverse effects on the amenities of adjoining or nearby properties or have an unacceptable impact on the surrounding area. This can include loss of privacy, daylight, sunlight, outlook or an increased sense of enclosure. It is considered that the position of the site and siting and massing of the proposed homes on the site would not have any adverse effect in terms of light, privacy, or outlook on the amenities of residents in adjacent properties.

### **Privacy and Outlook**

- 8.26 The adjacent property to the west, 7 Smitham Down Road, is the nearest property and is in use as a residential care home for the elderly. The windows proposed to the western flank elevation wall of the proposed building would all be secondary windows and would be provided with obscure-glazing. The applicant has demonstrated that the siting and massing of the proposed building would not incur within 45 degree lines of the nearest front and rear windows of 7 Smitham Downs Road. The proposed northern facing elevation windows would be sited approximately 33 metres distance from the front facing windows of 4 Smitham Downs Road. The proposed southern facing windows would be sited approximately 45 metres distance from the rear facing windows of 2 The Drive. The proposed eastern-facing windows would be sited approximately 40 metres distance to the front facing windows of 2 Downlands Road and approximately 25 metres distance from the northern flank windows of 3 Downlands Road. Therefore, these distances would comfortably exceed the 18 metre window-to-window distance advocated in the SDG and that no nearby properties would be adversely affected by issues of privacy and outlook.

### **Light**

- 8.27 The applicant has submitted a daylight/sunlight report with the application. The effects of the proposed development on a total of 4 nearby properties were assessed, being 2, 3a, 4, and 7 Smitham Downs Road (see image below). Number 7 Smitham Downs Road is a residential care home; whilst not strictly use class C3 accommodation (residential), the submitted assessment still considers any potential loss of light to this property.



Figure 7: surrounding properties in aqua tested in relation to light

- 8.28 In terms of vertical sky component (VSC), 20 out of the 23 windows (87%) meet or exceed the BRE guidelines. The second daylight test (no-skyline) shows 16 out of 19 rooms (84%) meet the BRE guidelines. The only failures relate to 7 Smitham Downs Road.
- 8.29 There are 5 windows (serving 3 rooms) on the eastern flank elevation of the care home at 7 Smitham Downs Road. Whilst these appear to serve either non-habitable windows or be secondary windows, the assessment considers a worse-case scenario that there is an expectation of receipt of light. With regard to 3 windows on this flank which exceed the BRE's advisory 20% former value, the average retained VSC for the affected windows is 19% which is considered acceptable, even in a suburban setting such as Purley. The greatest reduction would be 45.5% which would be a major adverse impact, but with a retained VSC of 20% is on balance acceptable. The NSL would also exceed the BRE's advisory 20%, but the rooms which these windows serve benefit from almost all of the area being able to see a portion of direct sky in the existing conditions (enjoying uncharacteristically high levels of light) and all the rooms will be able to see direct sky to at least 50% of the area in the proposed condition. In terms of sunlight, 15 out of 16 rooms (94%) will achieve BRE compliance. The one room failure would be a major adverse impact. Overall, the effect of the proposed development to light at 7 Smitham Downs Road would be considered acceptable.

#### Other Amenity Issues

- 8.30 In terms of noise and general disturbance it is considered that there would be noise and general disturbance result from demolition and construction works. A full construction logistics plan can be secured by condition to ensure proposed works are effectively managed to minimise disruption and disturbance. It is not considered that the development would result in any adverse increased noise from the number of dwellings proposed on the site given the detached form of the proposed development.
- 8.31 In terms of safety and security it is considered that increased natural passive surveillance would result from the proposed development, so it is likely to

provide a safer environment than the arrangement. Details of security lighting to the external access and external circulation areas would be secured by condition.

### **Parking and Highway Safety**

- 8.32 The site is located on the corner of Smitham Downs Road and The Vale. The site has a PTAL rating of 2 which means that it has poor to moderate access to public transport links. The site is also located approximately 100 metres from a bus stop and approximately 120 metres from Brighton Road which has several bus routes.

Figure 8. Local Public Transport Connections



- 8.33 The London Plan sets out maximum car parking standards for residential developments based on public transport accessibility levels and 1-2 bedroom units should provide no more than 0.75 spaces per unit and for 3 bedroom units no more than 1.5 spaces per unit. Taking all this into account the maximum provision for this development could be 17.75 parking spaces. A Transport Statement was submitted with the application and it shows that the expected demand for parking spaces, based on census data, would be 19 car parking spaces.
- 8.34 The proposal provides 10 off-street car parking spaces on-site. This equates to a ratio of 0.5 car parking spaces per dwelling. The parking provision includes 2 wheelchair accessible space and step free access to the building. While the amount of off-street parking would fall short of the demand that could be expected for the development, in this case a Parking Stress survey undertaken by the applicant indicates that the development would have limited impact on existing parking stress levels. The average local parking stress on local roads

was recorded as 28.4%, with the highest parking stress of 67% recorded on The Drive. Therefore, it is considered the surrounding roads would be able to accommodate the potential additional demand. The Parking Stress survey also took account of the proposed stress that would result from the proposed scheme and of the cumulative effect that could result from nearby consented developments and again it was found that there would be a large amount of capacity for the potential overspill of 1.25 cars that could result from the proposed development. The highest total average existing parking stress for the 5 local roads observed during the parking stress survey is reported as 28.6%, which would rise to 32.2% as a result of the proposed development, and rise to 37.1% as a result of the effect of cumulative developments in the locality. Given the minor nature of those developments, their own provision for off-street parking, and that there are no local parking restrictions to the local roads this is a reasonable conclusion.

- 8.35 The car park areas would be accessed from Smitham Downs Road (at ground level) and The Vale (at lower ground level) respectively. The Smitham Downs Road access would be located further to the west than the existing access, while the access to The Vale would be located marginally further to the east than the existing one. The Council would require any redundant dropped kerbs to be put back to full height kerbs at the developer's expense and this would be secured by condition. Electric Vehicle Charing Points would be provided within the parking area and would consist of 20% active and 20% passive provision. The applicant is content to accept a Car Park management plan as a condition of planning permission.
- 8.36 A total of 40 bicycle spaces would be provided in a storage area within the lower ground floor of the building, with access from The Vale. The amount of bicycle storage would comply with London Plan standards for resident and visitor cycles. Electric cycle charging points are also proposed. A buggy storage area would also be provided adjacent to it within the building and this would benefit families with children.
- 8.37 Notwithstanding the acceptability of the car parking provision and cycle provision, to further encourage sustainable transport methods and discourage car ownership, it is recommended that a financial contribution of £20,000 is sought through a S106 legal agreement. This would assist in the creation of an on-street car club electric vehicle bay and would assist in improving walking and cycle routes in the vicinity of the site.
- 8.38 The Transport Assessment submitted with the application provides a road safety audit and finds that within 200 metres of the site in the past 5 years there have been 20 traffic collisions, comprising 19 slight incidents and 1 serious incident, but with no fatalities. The data has reveals no collisions occurred at or in the immediate vicinity of the two proposed vehicle access points (one being the existing one). One collision was indicated at the junction of Smitham Downs Road and The Vale, resulting in slight injuries. The data shows a number of collisions occurred on Brighton Road, near the junctions with Smitham Down Road and Stoats Nest Road and this presumably due to the heavy traffic use on Brighton Road. A number of objectors have cited concerns that the traffic

from the scheme would have on the safety of children using Woodcote Primary School. However, the school is sited approximately 660 metres to the north-west of the site and to the west of the (A237) Woodcote Grove Road. Moreover, the layout of the proposed car parking areas is also such that they would allow cars to enter and exit in a forward gear and this would assist road safety. A condition would be used to ensure that proper visibility splays are provided to the vehicle accesses. Overall, it is considered there are no existing road safety issues associated with the site, especially with the access points.

8.39 Taking into account the sites location, amount and layout of off-street parking and cycle storage proposed, alongside the sustainable transport contribution proposed to be secured via legal agreement overall the proposal is not considered to have an unacceptable impact upon traffic generation, parking capacity, and road safety to warrant refusal.

8.40 Details of a full Construction Logistics Plan can be secured by condition to ensure that the demolition and construction works would be undertaken in a considerate manner.

#### **Refuse Storage**

8.41 The refuse storage for the flats would be incorporated within the building at lower ground floor level. It would be sited 18.80 metres away from the pavement of The Vale and so would be within the 20 metre pull distance of refuse collectors. This would be an acceptable arrangement.

#### **Flood Risk**

8.42 The site falls within a Flood Zone 1 area and within a Critical Drainage Area. The applicants have submitted a Flood Risk Assessment (FRA) which was reviewed by the LLFA and overall the LLFA has no drainage objections to the proposed scheme. The actionable measures of the FRA can be secured by condition to ensure that a sustainable urban drainage system would be implemented and retained.

#### **Sustainability**

8.43 Policy seeks high standards of design and construction in terms of sustainability and sets out Local and National CO2 reduction targets.

8.44 Sustainable features proposed include an array of PV panels that will be orientated South spread across the main roofs at 3rd and 4th levels. The predicted site wide reduction in CO2 over Part L 2014 of the Building Regulations is 79.0%; with energy efficiency measures reduction of 10.6%, renewable technology reduction of 76.5% and a carbon offset financial contribution of £8939.10 based on Croydon Council shortfall cost of £60/tonne CO2 for a 30 year period. The financial contribution would be secured as part of a S106 agreement.

8.45 Conditions can be used to ensure CO2 reduction compliance and to ensure water use targets have been met following construction. Furthermore, a condition is recommended in relation to calculating and reducing un-regulated carbon emissions not controlled by the Building Regulations, as required by SI2

of the London Plan. Therefore, the development would comply with the CO2 reduction target requirements as outlined within the policies from both Croydon Council and The London Plan.

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

- 8.46 An arboriculture report, landscaping strategy and an ecology assessment were submitted with the application. The proposal would result in the removal of seven individual trees within the site and all of the trees identified for removal are graded as category 'C' specimens, of low quality. One would be removed from next to the northern boundary, one from the middle of the site, and five from next to the southern boundary. The individual trees to be removed are predominantly small leaved lime trees and all low quality specimens. A hedgerow of small leaved lime trees adjacent to the southern boundary of the site would also be removed and again are low quality specimens. The removal of the trees is intended to enable the proposed landscaping scheme. Tree protection measures would be put into place for those trees on/adjacent to the site to be retained and this matter can be secured by condition.
- 8.47 Near to the proposed vehicle accesses some minor facilitative pruning is required to the boundary trees in 7 Smitham Downs Road to allow clearance above the proposed car parking spaces. Also, the crown of one other tree in 7 Smitham Downs Road is to be pruned back to the boundary. This is a large un-managed tree growing close to built structures. The proposed pruning of these trees would allow adequate space for access for the construction activities and for future growth, and would have no significant impact on the trees' health, longevity or appearance.

Figure 9. CGI of Proposed Landscaping and Ecology

Axo View



- 8.48 The landscaping and ecology scheme includes new tree planting, including native species such as birch, lime, and oak trees. The planting would also include a variety of flowers, herb planting and shrubs and a wildflower meadow. A condition is recommended to be included within the landscaping condition to ensure the 0.4 minimum urban greening factor is achieved. There would be



areas for seating and children's play space, which would include a circuit of timber play equipment. The type of environment created would promote recreational use and provide habitats for flora, fauna, and insects. The hard landscape areas would complement the appearance of the proposed built form and the textures and materials therein would assist in delineating the purpose of each area and access.

- 8.49 It is considered the proposed landscaping strategy would represent a significant uplift in the greenery of the site, including significantly varied native tree planting. It would bring about additional planting, including a wildflower meadow, and sustainable drainage and this would assist in tackling climate change and promoting a net gain in biodiversity as desired by the London Plan. The implementation of the proposed landscaping scheme including full details of the tree planting can be secured by condition.

### **Other Matters**

#### **Air Pollution**

- 8.50 An air quality assessment was submitted with the application and its actionable mitigation measures to minimise air pollution can be secured by condition. An environmental management plan and a construction logistics plan would be secured by condition prior to the commencement of the development, including demolition works. Additionally, the S106 legal agreement would include an air quality financial contribution of £100 per unit, equating to £2,000 in total.

#### **Contaminated Land**

- 8.51 The site is in residential use and the land is unlikely to be contaminated. However, a condition requiring the submission of a desk-top study contamination report and requiring any necessary remedial works to be carried out as appropriate is recommended to ensure a safe environment for future residents.

#### **CIL**

- 8.52 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.

### **Conclusions**

- 8.53 Given the significant need for housing within the Borough and the existing residential status of the site, the principle of this residential development is considered acceptable within this area. The proposed design would bring forward a contemporary re-interpretation design on a residential site in a residential area and would represent a sensitive and sustainable re-development, placing particular emphasis on providing family friendly accommodation. Whilst it is acknowledged that the mass of built form would be greater than the existing house currently on site, the proposal would be in context with its corner site and surroundings. The proposal would have no significantly harmful impact on the amenities of the adjacent properties and the application demonstrates that the impact on the highway network would be

acceptable. Officers are satisfied that the scheme is worthy of a planning permission and would deliver a high quality residential development as sought by policy.

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