

PART 6: Planning Applications for Decision

Item 6.2

1 APPLICATION DETAILS

Ref: 21/06276/FUL
 Location: 15A Russell Hill, Purley, CR8 2JB
 Ward: Purley And Woodcote
 Description: Demolition of existing single storey detached dwellinghouse (two storey building above ground level and one storey of lower ground accommodation) including demolition of detached garage and erection of a three storey building (two storey building above ground level and one storey of lower ground accommodation) comprising 7 self-contained flats; private/communal amenity and play space; hard and soft landscaping; boundary treatment; reinstatement of existing crossover and new crossover to provide forecourt parking; cycle and refuse provision and land level alterations including raising to the front (amended plans)
 Drawing Nos: 06-939_301 Rev P04, 000 Rev P1, 001 Rev P1, 002 Rev P3, 010 Rev P1, 011 Rev P2, 012 Rev P2, 013 Rev P2, 014 Rev P1020 Rev P1 and 021 Rev P1.
 Applicant: Russell Hill Ltd
 Agent: Dust Architecture
 Case Officer: Georgina Betts

Housing Mix					
	1 bed (2 person)	2 bed (3 person)	2 bed (4 person)	3 bed (5 person)	TOTAL
Existing				1	1
Proposed (market housing)	1	4		2	7
TOTAL	1	4			

Vehicle and Cycle Parking (London Plan Standards)	
PTAL: 1b	
Car Parking maximum standard	Proposed
10.5	4
Long Stay Cycle Storage minimum	Proposed
13.5	16
Short Stay Cycle Storage minimum	Proposed
2	2

1.1 This application is being reported to committee because:

- The ward councillor (Cllr Samir Dwesar) made representations in accordance with the Committee Consideration Criteria and requested committee consideration.

2 RECOMMENDATION

- 2.1 That the Committee resolve to GRANT planning permission
- 2.2 That the Director of Planning Sustainable Regeneration is delegated authority to issue the planning permission subject to:
 - A. The prior completion of a legal agreement to secure the following planning obligations:
 - a) Sustainable transport contribution (financial)
 - b) The removal of residential parking permits should a Controlled Parking Zone be introduced in the future.
 - c) Any other planning obligation(s) considered necessary by the Director of Planning and Sustainable Regeneration
- 2.3 That the Director of Planning and Sustainable Regeneration is delegated authority to negotiate the legal agreement indicated above.
- 2.4 That the Director of Planning and Sustainable Regeneration is delegated authority to issue the planning permission and impose conditions and informatives to secure the following matters:

Conditions

- 1) Commencement time limit of 3 years
- 2) Carried out in accordance with the approved drawings

Pre-commencement conditions

- 3) Construction Logistics Plan to include a survey of the public highway
- 4) Landscaping and hard standing

Pre-Occupation Conditions

- 5) External materials and samples
- 6) Implementation of car parking as specified
- 7) Electric Vehicle Charging Points at 20% active and 80% passive
- 8) Submission of a lighting scheme
- 9) Submission of a biodiversity enhancement plan

Compliance Conditions

- 10) Accessibility (M4(2) and M4(3))
- 11) Refuse, cycle stores and play space to be provided as approved
- 12) In accordance with the Fire Statement
- 13) Energy and water efficiency requirements
- 14) Any other planning condition(s) considered necessary by the Director of Planning and Strategic Transport

Informatives

- 1) Granted subject to a Section 106 Agreement
- 2) Community Infrastructure Levy
- 3) Code of practice for Construction Sites
- 4) Construction Logistics Informative
- 5) Any other informative(s) considered necessary by the Director of Planning and Sustainable Regeneration

- 2.5 That the Committee confirms that adequate provision has been made, by the imposition of conditions, for the preservation or planting of trees as required by Section 197 of the Town and Country Planning Act 1990.
- 2.6 That, if by 17th February 2023 the legal agreement has not been completed, the Director of Planning and Sustainable Regeneration is delegated authority to refuse planning permission.

3 PROPOSAL AND LOCATION DETAILS

Proposal

- 3.1 The applicant seeks full planning permission for the demolition of existing single storey detached dwellinghouse (two storey building above ground level and one storey of lower ground accommodation) including demolition of detached garage. The erection of a three storey building (two storey building above ground level and one storey of lower ground accommodation) comprising 7 self-contained flats; private/communal amenity and play space; hard and soft landscaping; boundary treatment; reinstatement of existing crossover and new crossover to provide forecourt parking; cycle and refuse provision and land level alterations including raising to the front (amended plans)



Image 2: Proposed Site Layout

Amendments

- 3.2 Amended plans were received on the 28th July 2022 which sought to centralise the front gable feature to break down the massing of the building and included alterations to the internal layout and rear elevation. Third parties were re-consulted regarding these amendments given their significance and the time lag between the submission and the receipt of the amended plans.

Site and Surroundings

- 3.3 The application site consists of a detached bungalow with a detached garage to the side that lies on the southern side of Russell Hill. The bungalow is accessed via a set of steps down into the site, whereas the garage is located directly off the main road supported by a significant retaining structure by reason of the drop in ground level. Russell Hill is characterised by a mixture of dwelling types and sizes with a number of large blocks of flats that have been built in recent years. The site is significantly shallower than the neighbouring plots and is heavily vegetated. There are no TPOs at the site. The land varies significantly across the site. The dwelling is set well down from the highway and the site continues to fall away to the rear. The site has a Public Transport Accessibility Level (PTAL) of 1b (poor). The site lies within an area at very low risk of surface water flooding.



Image 2: Site Location Plan

Planning Designations and Constraints

- 3.4 The site is subject to the following formal planning constraints and designations:
- PTAL: 1b
 - At risk of surface water flood risk (being 1 in 1000 year and critical drainage)

Planning History

- 3.5 The following planning decisions are relevant to the application:
- 3.6 18/05697/OUT – Planning permission was refused for the demolition of existing dwelling and detached garage and the erection of a 2/3 storey building to provide 6 flats (4 x three bed and 2 x one bed) with associated parking, amenity space, bin store and cycle store. Access, Layout and Scale ONLY to be considered.

- 3.7 19/01963/OUT – Planning permission was granted for the outline application for demolition of existing dwelling and garage and the erection of a 2/3 storey building to provide 6 flats with associated parking, amenity space, bin store and cycle store. Access, Layout and Scale ONLY to be considered. This is the application to which this reserved matters relates.
- 3.8 20/03755/FUL – Planning permission was refused for the demolition of existing single storey detached dwellinghouse (with roof accommodation) including demolition of detached garage and erection of a three storey building comprising 9 self-contained flats; private/communal and play space; hard and soft landscaping; boundary treatment; reinstatement of existing crossover and new crossover to provide forecourt parking; cycle and refuse provision and land level alterations including raising to the front. An appeal was later dismissed.
- 3.9 21/01485/FUL – Planning permission was refused for the demolition of existing single storey detached dwellinghouse (with roof accommodation) including demolition of detached garage and erection of a part two; part three storey building (including lower ground levels and accommodation in the roof level) comprising 8 self-contained flats; private/communal amenity and play space; hard and soft landscaping; boundary treatment; reinstatement of existing crossover and new crossover to provide forecourt parking; cycle and refuse provision and land level alterations including raising to the front. An appeal was later dismissed.
- 3.10 22/02397/RSM – Planning permission was granted on the 28th September 2022 for the reserved matters relating to appearance and landscaping (condition 2) attached to planning permission ref 19/01963/OUT for the demolition of the existing dwelling and garage and the erection of a 2/3 storey building to provide 6 flats with associated parking, amenity space, bin store and cycle store.

4 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The principle of the intensified residential development is acceptable given the residential character of the surrounding area and the need for housing nationally and locally. In addition, an extant permission exists on site for a similar development.
- There is an acceptable mix of unit sizes with all dwellings capable of being classified as family homes;
- The quality of accommodation is acceptable for future residents;
- The design and appearance of the development is an acceptable quality, and it is not considered that it would harm the character of the surrounding area;
- The proposal would not create undue harm to the amenity of nearby residential properties and their occupiers;
- The level of parking and impact upon highway safety and efficiency would be acceptable;
- Impacts upon biodiversity and ecology is acceptable;

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

5 CONSULTATION RESPONSE

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

6 LOCAL REPRESENTATION

6.1 A total of 80 neighbouring properties were notified about the application and invited to comment. The number of representations received from neighbours, local groups etc in response to notification and publicity of the application were as follows:

No of individual responses: 8 Objecting: 8 Supporting: 0

6.2 The following Councillor and MP made representations:

- Councillor Samir Dwesar [objecting]
- Chris Philp MP [objecting]

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

Objection	Officer comment
Character and design	<i>Covered within paragraphs 8.10-8.25</i>
Out of keeping, obtrusive and overdevelopment	
Neighbouring amenity	<i>Covered within paragraphs 8.38-8.46</i>
Loss of light and privacy, visual intrusion, increase in crime and or loss of security, general noise and disturbance	
Quality of accommodation	<i>Covered within paragraphs 8.26-8.37</i>
Poor standards of daylight, loss of a small family home	
Transport and Highways impacts	<i>Covered within paragraphs 8.50-8.64</i>
Parking congestions and lack of on-site parking, poor accessibility	
Trees and ecology	<i>Covered within paragraphs 8.47-8.49</i>
Detrimental to the retention of trees and ecological interests	
Land slippage and subsidence	<i>Covered within paragraph 6.4 below</i>

6.4 The following additional issues were raised in representations that officers have considered, and would like to bring make the Committee aware of, noting that they are not material to the determination of the application:

- Colleagues within Building Control were approached by the Case Officer during the course of this application as a result of third-party comments in regards to land slippage. In addition, the applicant was asked to provide some clarify from a Structural Surveyor that the proposal would not result in harmful levels of subsidence. Providing that any consented scheme is carried out in accordance with building regulation and given the geology of the surrounding area it is not considered that the proposed development would result in any significant risk.

7 RELEVANT PLANNING POLICIES AND GUIDANCE

Development Plan

7.1 The Council's adopted Development Plan consists of the London Plan (2021), the Croydon Local Plan (2018) and the South London Waste Plan (2012). Although not an exhaustive list, the policies which are most relevant to the application are:

London Plan (2021)

- D3 Optimising site capacity through the design-led approach
- D4 Delivering good design
- D5 Inclusive design
- D6 Housing quality and standards
- D7 Accessible housing
- D11 Safety, security and resistance to emergency
- D12 Fire Safety
- D14 Noise
- H1 Increasing housing supply
- H2 Small sites
- H10 Housing size mix
- S4 Play and informal recreation
- G5 Urban Greening
- G6 Biodiversity and access to nature
- G7 Trees and woodlands
- SI1 Improving air quality
- SI2 Minimising greenhouse gas emissions
- SI3 Energy infrastructure
- SI5 Water infrastructure
- SI12 Flood risk management
- SI13 Sustainable drainage
- T4 Assessing and mitigating transport impacts
- T5 Cycling
- T6 Car parking
- T6.1 Residential parking
- T7 Deliveries, servicing and construction
- T9 Funding transport infrastructure through planning

Croydon Local Plan (2018)

- 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
- DM23 Development and construction
- DM25 Sustainable drainage systems and reducing floor risk
- DM27 Protecting and Enhancing our Biodiversity
- DM28 Trees

- SP8 Transport and communications
- DM29 Promoting sustainable travel and reducing congestion
- DM30 Car and cycle parking in new development
- DM42 Purley

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

Planning Guidance

National Planning Policy Framework (NPPF)

7.3 Government Guidance is contained in the NPPF, updated on 20 July 2021, and accompanied by the online Planning Practice Guidance (PPG). The NPPF sets out a presumption in favour of sustainable development, requiring that development which accords with an up-to-date local plan should be approved without delay. The NPPF identifies a number of key issues for the delivery of sustainable development, those most relevant to this case are:

- Delivering a Sufficient Supply of Homes
- Promoting Sustainable Transport
- Achieving Well Designed Places

SPDs and SPGs

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

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

8 MATERIAL PLANNING CONSIDERATIONS

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

1. Principle of development
2. Design and impact on character of the area
3. Quality of residential accommodation
4. Impact on neighbouring residential amenity
5. Trees, landscaping and biodiversity
6. Access, parking and highway impacts
7. Flood risk and energy efficiency
8. Conclusions

Principle of development

- 8.2 The Croydon Local Plan sets out a housing target of 32,890 homes over a 20-year period from 2016-2036 (1,645 homes per year). The London Plan requires 20,790 of those homes to be delivered within a shorter 10 year period (2019-2029), resulting in a higher target of 2,079 homes per year.
- 8.3 The Croydon Local Plan also sets out a target for development on Windfall sites of 10,060 homes (approximately 503 per year). The London Plan requires 6,410 net completions on small sites (below 0.25 hectares in size) over 10 years, with a small-sites housing target of 641 per year.
- 8.4 The London Plan 2021 (LP) and the National Planning Policy Framework 2021 (NPPF) place significant weight on housing delivery and focus on the roles that intensification and small sites in particular can play in resolving the current housing crisis.
- 8.5 Policy SP2.1 of the Croydon Local Plan 2018 (CLP) applies a presumption in favour of development of new homes and Policy SP2.2 states that the Council will seek to deliver 32,890 homes between 2016 and 2036, with 10,060 of said homes being delivered across the borough on windfall sites.
- 8.6 LP policy D3 encourages incremental densification to achieve a change in densities in the most appropriate way. Policy H2 seeks to significantly increase the contribution of small sites to meeting London's housing needs.
- 8.7 CLP Policy DM1.2 seeks to prevent the net loss of small family homes by restricting the loss of three-bedroom units and the loss of units that have a floor area of less than 130sqm. The existing property is a four bedroom detached home in excess of 130m² and as such the proposal would not result in the loss of a small family home.
- 8.8 CLP Policies SP2.7 and DM1.1 set a strategic target for 30% of all new homes over the plan period to have 3 or more bedrooms to meet the borough's need for family sized units and ensure that a choice of homes is available in the borough.
- 8.9 The proposed development would result in the demolition of a small family home with a GIA of 127m², it is noted that this is marginally below the 130m² threshold as set out in Policy DM1.2. Of the 7 units proposed 2 units would have at least 3-bedrooms and as such the proposal would result in a net increase in family homes. Given the significant weight that has to be attached to housing delivery as set out in the framework and the net increase of one family sized unit it is considered that the proposal would accord with the development plan when taken as a whole.

Design and impact on character of the area

- 8.10 CLP policy SP4.1 states that the council will require development of a high quality, which respects and enhances Croydon's varied local character and contributes positively to public realm, landscape and townscape to create sustainable communities.
- 8.11 CLP policy DM10.1 has a presumption in favour of 3 storey dwellings, which should respect the development pattern, layout; siting, the scale, height, massing, and density; and the appearance, existing materials, and built and natural features of the surrounding area.

- 8.12 CLP Policy DM10.7 requires developments to incorporate high quality materials that respond to the local character in terms of other things durability, attractiveness, sustainability, texture and colour. This policy also requires roof forms to positively contribute to the character of the local and wider area with proposals being sympathetic with its local context.
- 8.13 Layout, Height, Form, Scale and Massing: The application site fronts onto Russell Hill and while the land levels fall substantially from the north-east to south-west. The immediate area is residential in character and historically comprised large detached single and two storey detached properties within generous plots. However more recently the immediate area has been subject to a number of planning applications and consents to demolish the existing properties and to erect a number of flatted developments. As a result the more recently constructed development is of a larger scale to the buildings that they replaced. Site access is currently sited to the north-western corner of the site and leads onto a single storey detached garage. While the existing dwelling could be classed as a bungalow, accommodation is provided over two floors, being at the ground floor and loft levels. The site forms part of an established building line however is set substantially lower than the adjacent highway.
- 8.14 CLP policy DM10.1 states that new development should seek to achieve a minimum height of 3 storeys. The proposed development has been designed to appear as two stories with accommodation in the roof space when viewed from the street, with a centralised gable feature to the front and a pair of symmetrical gables towards the rear. The proposed roof typology is that of a hip with intersecting gable features towards the north-eastern and south-western elevations. The proposed hip roof and gable features, while larger in form than the building it replaces, would seek to respect the character of the locality and complement the architectural styles of nearby dwellings and more recently the flatted developments. The overall height of the development would sit above the adjacent properties but given the topographical changes and variation of architectural forms would not appear overly dominant or out of character with the immediate area. A generous separation distance between the site and that of 15 and 15a would offset any increase in perceived mass.



Fig 3: Proposed Streetscene Elevations

- 8.15 The proposed development is therefore of an acceptable scale and design and would respond to neighbouring character, as such meets the objectives of DM10 and the National Design Guide 2021.

- 8.16 CLP Policy DM10.1 (a) requires the development pattern, layout and siting to respect that of the surrounding area. The proposed layout would align with the established building line of Russell Hill and would sit comfortably within the street scene.
- 8.17 CLP Policy DM10.1 (b) requires the proposal to respect the scale, height, massing, and density. The proposed building would be set in from the site boundaries with a landscaped buffer to the north-eastern and south-western boundaries which would seek to integrate the development within its sylvan setting while contributing to biodiversity. The generous separation distance to neighbouring properties to the north-east and south-west would not disrespect the development pattern of the surrounding area.
- 8.18 Car parking for four vehicles would be located within the forecourt area of the site with sufficient turning areas. The hard to soft landscaping ratio is well balanced with adequate spacing to incorporate meaningful planting. The indicative schedule of hardstanding materials would help to soften and visually break down the appearance of the parking area, this approach is similar, in some cases better, than other examples in the area. This approach is accepted in character terms.
- 8.19 Architectural Expression: CLP policy DM10.1 (c) requires proposals to respect the appearance, existing materials and built and natural features of the surrounding area.
- 8.20 Although the scheme has evolved since the Design and Access Statement (DAS) it depicts a contextual analysis carried out on the site and surrounding area. There is a clear rationale for how this has influenced the design and materiality that is now before members. Officers have sought amendments during the course of the application to ensure that the proposed development is of a high quality.
- 8.21 The indicative materials for the building would consist of red and buff bricks with clay roof tiles and redner. The window frames would be of a darker colour to contrast with the warm colour of the red brick and roof tiles. These materials are acceptable given the mixed character of the area.

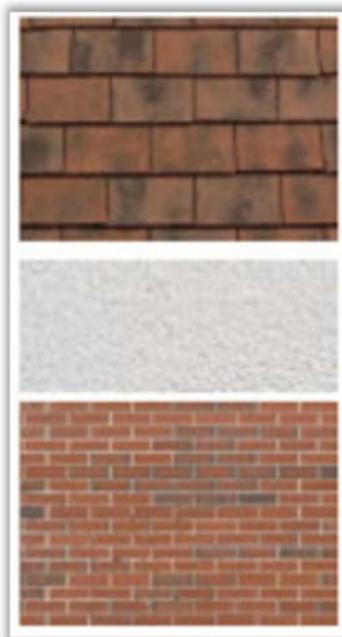


Figure 4: Indicative materials

- 8.22 Full details of the external materials and finishes would be secured via condition to ensure that they are of a suitable quality.
- 8.23 Landscaping: The site currently benefits from a well vegetated frontage which contributes to the character of the area but also provides privacy to the current owner. Some landscaping would be removed from the north-eastern boundary to accommodate the development and the realigned vehicular access. The indicative landscaping plan is well considered and utilises the change in land levels and sunken area to define multi-faceted private and communal areas.
- 8.24 The waste, recycling and cycle stores would be integrated within the built form and are of a sufficient size. Freestanding visitor cycle parking would be provided towards the front of the building in the form of Sheffield stands. As full details have been provided, no further details are required by condition. The details of the external doors to the refuse store would be secured as part of the external facing materials condition but are proposed as timber to tie in with other elements on the building and are considered acceptable.
- 8.25 Conclusion: The design approach is considered to respect the character of Highland Road, in terms of design, height, scale, massing and layout and the proposed landscaping is well considered.

Quality of residential accommodation

- 8.26 LP policy D6 states that housing developments should be of a high quality and provide adequately sized rooms with comfortable and functional layouts. It sets out minimum Gross Internal Area (GIA) standards for new residential developments. CLP policy SP2.8 also deals with quality and standards. The table below demonstrates the GIAs of each residential dwelling:

Unit	Size (bedroom/ person)	GIA (sqm) proposed	Min. GIA (sqm)	Amenity Space (sqm)	Min. Amenity Space (sqm)	Built in storage space (sqm)	Min. built in storage space (sqm)
1	3b5p	98.088m ²	86m ²	8.587 m ²	7m ²	2.384 m ²	2.5m ²
2	3b5p	90.192m ²	86m ²	8.315 m ²	7m ²	2.112 m ²	2.5m ²
3	2b3p	69.120m ²	61m ²	6.230 m ²	6m ²	1.295 m ²	2m ²
4	2b3p	70.307m ²	61m ²	6.230 m ²	6m ²	1.295 m ²	2m ²
5	2b3p	69.772m ²	61m ²	6.230 m ²	6m ²	1.295 m ²	2m ²
6	2b3p	69.848m ²	61m ²	6.230 m ²	6m ²	1.295 m ²	2m ²
7	1b2p	67.292m ²	50m ²	14.467m ²	5m ²	1.248 m ²	1.5m ²

Table 1: scheme considered against London Plan Policy D6 and Table 3.1

- 8.27 As shown on the table above, all units comply with LP standards on minimum floorspace areas and amenity space. While it is noted that the units do not meet the minimal requirement for built in storage, as set out above the GIAs are significantly in excess of the minimum space standards and therefore each unit is capable of meeting this requirement and would not give grounds for a refusal. All bedrooms within the proposal comply with parts 2, 3, and 4 of policy D6 in relation to bedroom size standards. Each dwelling would also have a floor to ceiling height of 2.5m for at

least 75% of the floor space of the entire dwelling. All of the dwellings are dual aspect, therefore adequate light levels and ventilation will be available.

8.28 Representations have raised concerns regarding the quality of the living conditions of future occupiers in respect of the lower ground floor units and light levels. It is noted that the single bedrooms to Flat 1 and bedrooms 1 and 2 of Flat 2 would look out onto two separate light wells. These lightwells would be north-east and north-west facing with Flat 1 having a further southern outlook and Flat 2 benefitting from both an easterly and southern outlook. While the outlook from 3 bedrooms onto two light wells is not ideal this site is subject to significant land level changes and therefore it is inevitable that such a scenario would arise. Indeed, this is the case with the extant permission, which has been found previously acceptable. When weighing up the significant weight that is to be attached to housing delivery and the good level of outlook offered to the remaining accommodation it is not considered that limited outlook of the three bedrooms would give grounds to a refusal of planning permission.

8.29 Given the above it is considered that adequate floor areas and space standards would be provided for future occupiers.

Amenity Space

8.30 CLP policy DM10.4c states: All proposals for new residential development will need to provide private amenity space that provides a minimum amount of private amenity space of 5m² per 1-2 person unit and an extra 1m² per extra occupant thereafter.

8.31 CLP policy DM10.4d states: All proposals for new residential development will need to provide private amenity space that all flatted development and developments of 10 or more houses must provide a minimum of 10m² per child of new play space, calculated using the Mayor of London's population yield calculator and as a set out in Table 6.2.

8.32 CLP policy DM10.5 states: In addition to the provision of private amenity space, proposals for new flatted development and major housing schemes will also need to incorporate high quality communal outdoor amenity space that is designed to be flexible, multifunctional, accessible and inclusive.

8.33 All of the units have private amenity space in excess of the minimum standards set out in Table 1 above. While the communal garden area is smaller in size than the surrounding plots it is well designed and is capable of use by multiple users given the multi-faceted spaces. As demonstrated on the table above the proposal is capable of providing the required communal amenity areas and the required 14.3m² of playspace which is included within the indicative landscaping plan.

Accessible Dwellings

8.34 LP policy D7 states that 10% of new build housing should meet Building Regulation requirement M4(3) 'Wheelchair User Dwellings'; and all other dwellings should meet the Building Regulation requirement M4(2) 'Accessible and Adaptable Dwellings' which requires step free access to all units and the facilities of the site.

8.35 The proposed development would be step free and a lift would be provided within the communal hallway. Flats 3 and 4 would appear to be M4(3) compliant. A disabled parking bay is provided immediately outside the proposed building and has been designed to provide step free access, with rear access to the communal garden from

lower ground floor level. Refuse storage is provided in a purpose-built store to the western flank while cycle storage, integrated within ground floor plan. The proposal would provide 2 units capable of meeting M4(3) and 5 units capable of meeting M4(2); this would be secured by condition with final details secured at building control approval stage.

Fire Safety

- 8.36 LP policy D12A states that in the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety. The applicant has submitted a Fire Statement which sufficiently demonstrates that the proposal complies with the requirements of the London Plan 2021, which will be conditioned, with final fire safety measures secured at the Building Regulations stage.
- 8.37 Overall, the standard of accommodation is considered to be acceptable, subject to conditions.

Impact on neighbouring residential amenity

- 8.38 CLP policy DM10.6 states that the Council will ensure proposals protect the amenity of occupiers of adjoining buildings and will not result in direct overlooking into their habitable rooms or private outdoor space and not result in significant loss of existing sunlight or daylight levels. CLP policy DM10.6(c) outlines that proposals for development should not result in direct overlooking of private outdoor space (with the exception of communal open space) within 10m perpendicular to the rear elevation of a dwelling.
- 8.39 CLP Policy DM10.6c requires new developments to not result in direct overlooking of private space 10m perpendicular to the rear elevation of an existing neighbouring property.
- 8.40 The proposed development would lie approximately 5.16 metres from the flank wall of 15 Russell Hill and approximately 10.28 metres from 15a Russell Hill. The proposed development would be sited centrally within a plot and would project a modest 1.1 metres beyond No15 and 2.65 metres beyond the rear of No 15a. Given the separation distance and modest rearward projection the proposed development is not considered to appear visually intrusive or overbearing.
- 8.41 From the Officers site visit a number of windows were seen within the flank walls of 15 and 15a Russell appear but none appeared to be habitable, or if so, were secondary in nature. Given the separation distances and the nature of the rooms in which these windows serve it is not considered that the proposed development would result in a harmful loss of light to warrant a refusal of planning permission.
- 8.42 Balconies are proposed as part of the development and would be sited towards the rear elevations, as such their outlook would be to the south. As the balconies have been designed as integral elements to the building views over the gardens of No 15 and 15a Russell Hill would be restricted as such would not result in any harmful loss of privacy.
- 8.43 No 4 Plough Lane is a flatted development and lies towards to south of the application site. A separation distance of approximately 32 metres would exist between the

proposed development and this neighbour, this separation distance far exceeds the 18-metre separation distance set out in the Mayors SPD. Given the substantial separation distance it is not considered that the proposal would result in significant harm to the residential amenities at No4 Plough Lane. Neighbouring properties to the north are again substantially separated from the proposed development and would not experience significant harm to their amenity.



Figure 5: Distance to neighbouring properties

Other Surrounding Properties

- 8.44 The parking area towards the front of the site would have to be raised given that the site sits substantially lower than the adjacent highway. The location of the parking area in relation to 15a Russell Hill is as approved under the outline planning permission (ref no: 19/01963/OUT). As part of this application Officers have sought better landscaping along the shared boundary with No15a to help soften the appearance of the raised parking area. Such landscaping details would be secured through condition and will need to be retained and maintained for a period of 5 years after completion. Given the increase in soft landscaping and the extant permission it is not considered that this raised parking would result in significant harm to the amenities of No15a to warrant a refusal of planning permission. A separation distance, be it on the modest side, would be retained while the raised parking area would lie to the northern side of No15a, as such the raised parking area is not considered to appear visually intrusive nor would it result in harmful overshadowing.
- 8.45 It is considered that other properties in the vicinity of the site are of a sufficient distance to mitigate against any unacceptable amenity impacts. Details of external lighting could be secured via condition to ensure that the proposal would not result in light pollution.

Construction Impacts

- 8.46 It is acknowledged that with any build, whilst there may be limited disturbances and inconveniences for neighbouring properties, there are no grounds to refuse planning permission based on construction impacts. A Construction Logistics Management Plan can be secured through condition which would seek to protect neighbouring amenities as far as possible during this time. In addition, under the Control of Pollution Act 1974, the council has a Construction Code of Practice which sets out when construction and demolition work can occur, and it is not expected that works will be

permitted to take place out of these hours. This would be placed as an informative (in the event planning permission is granted) and is enforceable under Environmental Health legislation.

- 8.47 Overall, any potential amenity impacts on neighbouring occupiers are considered to have been adequately mitigated by spatial separation between neighbouring properties. Furthermore, the orientation of the proposed development and the existing orientation of the surrounding neighbouring properties is favourable to mitigate adverse impacts. The proposal would therefore comply with policy DM10.6 and adhere to the guidance of the Suburban Design Guide 2019.

Trees, landscaping and biodiversity

- 8.48 LP Policy G7 and CLP policy DM10.8 and DM28 seek to retain existing trees and vegetation. CLP policy DM10.8 requires proposals to incorporate hard and soft landscaping.
- 8.49 The applicant has submitted a well-considered indicative landscaping plan which has been reviewed by Officers. A balance has been struck between hard and soft landscaping while the applicant has sought to retain existing vegetation where possible, any losses will be mitigated with replacement planting. Subject to a suitably worded condition to obtain full details of all landscaping features including plant species and sizes the proposal is considered acceptable in this respect. In addition, the tree officer has requested that the tree survey which includes details of trees to be retained is conditioned as part of any approval.
- 8.50 The site is not located in within a Site of Nature Conservation Area nor were any protected species identified within the Biodiversity and Ecological Survey. Officers did visit the site as part of the application process and ecological interests were explored, no evidence of protected species or potential habitats were evident. Subject to an appropriately worded condition the proposal would accord with policies G6 of the London Plan 2021 and DM27 of the Croydon Local Plan 2018.

Access, parking and highway impacts

- 8.51 The site has a Public Transport Accessibility Level (PTAL) of 1b, on a scale where 0 is the worst and 6 is the best, which indicates poor access to public transport, although the site is in relatively close proximity to Purley Town Centre. The site is not within a Controlled Parking Zone however it is noted that on street parking takes place along Russell Hill.
- 8.52 During the course of the application advice has been sought from the Highway Authority and the Transportation Team which follows on from advice given at the pre-application stage.

Access arrangements

- 8.53 The existing access would be altered to accommodate the development and would be subject to a separate highway works application. The amendments received could now provide appropriate visibility splays and would ensure that the access is safe for all users. The access arrangements are now considered acceptable by the Highway Authority and the Transportation Team.

Car Parking

- 8.54 LP Policy T6.1 suggests a provision of up to 1.5 car parking spaces per dwelling for developments within this PTAL, so up to a maximum 10.5 spaces.
- 8.55 The proposal includes 4no. car parking spaces which is provided towards the front of the site, accessed via Russell Hill. This provision would result in a parking ratio below the maximum standards in the London Plan. However, it needs to be noted here that the previous approval did not comply with the maximum provision as set out within the London Plan, at the time the outline/reserved matters consent (Ref No: 22/02397/RSM) was granted on four spaces for six units. Given the additional provision of 1 unit beyond the extant permission and the availability of on-street parking within 200 metres of the site the impacts of the proposal are not considered to be so great that would warrant a refusal of planning permission.
- 8.56 In addition, it is noted that the applicant has provided an over provision of on-site cycle parking and has incorporated such storage within the envelope of the building which would encourage more sustainable transport modes. The parking provision set out within the London Plan are maximum standards and having given weight to the fallback position (extant permission), it is not considered that the Council could substantiate a refusal reason on the lack of on-site parking and is therefore acceptable on balance.
- 8.57 Adequate space within the site has been provided to ensure that vehicles can manoeuvre in and out of the parking spaces freely. Each car would have adequate space next to hedges and walls to alight safely and efficiently.
- 8.58 A condition will be included to secure electric vehicle charging points, to ensure 20% active and 80% passive points are provided in line with CLP policy DM30 and LP policy T6.1.

Cycle parking

- 8.59 CLP Policy DM30 and LP policy T5 (and Table 10.2) requires the provision of a total of 12no. cycle parking spaces for residents and 2no visitor spaces.
- 8.60 A communal bicycle store would be incorporated within footprint of the building at the ground floor. Door widths are wide enough to ensure users can access the store while step free access is provided through the incorporation of a lift in the communal hallway. Provision has been made for 16 internal cycle spaces in excess of the required provision, and a space is also suitable for adapted bikes. Two visitor cycles parking spaces will be provided towards the front of the building (as Sheffield stands), which is acceptable. The quantum and form of storage is considered acceptable and would accord with Policy T5 of the London Plan 2021.

Planning Obligations

- 8.61 A contribution of £10, 500 will be secured via S106 agreement to contribute towards sustainable transport initiatives including on street car clubs with electric vehicle charging points (EVCPs) as well as general expansion of the EVCP network in the area in line with Local Plan policies SP8.12 and SP8.13. The funding will go towards traffic orders, signing, and lining of a potential car club bay, EVCP provision including electrics and set up costs for the car club. Funding will also be used for extension and improvements to walking and cycling routes in the area to support and encourage sustainable methods of transport.

- 8.62 It is recommended that car club membership is provided for each unit for a period of 3 years; this will be secured via S106 agreement to encourage the reduction in car ownership. Given the sites proximity to Purley Town Centre and the number of flatted developments within the immediate are this is considered appropriate.
- 8.63 A condition would be attached to require submission of a Construction Logistics Plan (CLP) which shall include a survey of the surrounding footways and carriageway prior to commencement of works on site.
- 8.64 Overall, in terms of transport matters, the proposal is considered acceptable, subject to conditions and a Section 106 Agreement to secure a contribution of £10,500 for sustainable transport initiatives and car club membership.

Waste / recycling facilities

- 8.65 Policy DM13 requires the design of refuse and recycling facilities to be treated as an integral element of the overall design.
- 8.66 Refuse would be collected from the highway with refuse personnel accessing an integrated refuse store within 9.58 metres of the highway, no refuse vehicles would need to enter the site itself. Given the close and attached nature of the refuse store residents would not have to walk more than 30m to dispose of their waste. The applicant has demonstrated that waste can be accommodated and collected.
- 8.67 While a bulky waste area has not been identified on the proposed block plan the site is capable of accommodating a bulky waste collection area.

Flood risk and energy efficiency

Flood Risk and Sustainable Drainage Systems (SuDS)

- 8.68 The site is at risk of surface water flooding but is not located within Flood Zones 1, 2 and 3. The Flood Risk Assessment that was submitted as part of this application identifies that the underlying geology is likely to be chalk, which can be used for infiltration purposes. However, the FRA states that while a soakway might have been appropriate given the underlying geology the required 10m separation distance between the building and soakaway is not achievable given the plot size; the applicant has also discounted other options such as rainwater harvesting while green roofs are not possible given the roof typology. Having gone through the flooding hierarchy in the LP, the applicant proposes to discharge surface water into the fowl sewage system. This matter is to be agreed between the applicant and Thames Water as it relates to sewage capacity. The applicant has gone through the process of trying to reduce or stem water run off from the site but for a number of reasons this has not been possible. The LPA are therefore satisfied that the application is in accordance with the Framework, Policies SI 12 and Si 13 of the LP 2021 and Policy DM25 of the CLP 2018. Given the above it would not be possible to attach a condition requiring the incorporation of SuDS as such is not feasible on this site. Officers can however look towards the details of the soft landscaping to maximise water take up and further details would be secured via condition.

Energy efficiency

- 8.69 CLP policy SP6 requires development proposals to both achieve the national technical standard for energy efficiency in new homes.
- 8.70 The proposal could include the installation of Solar PV on the southern roof slope or the installation of air source or ground source heat pumps given extensive roof slopes and spacing to either side boundary. As such the proposal can adhere to the energy hierarchy of the LP and would be in accordance with CLP policy SP6. To ensure that a reduction in CO2 emissions beyond the Building Regulations Part L is achieved and that a minimum water efficiency standard of 110 litres/person/day as set out in Building Regulations Part G is met a condition is deemed necessary.

Conclusion

- 8.71 All other relevant policies and considerations, including the statutory duties set out in the Equalities Act 2010, the Human Rights Act, the Planning and Compulsory Purchase Act, and the Town and Country Planning Act, have been taken into account. Given the consistency of the scheme with the Development Plan and weighing this against all other material planning considerations, the proposal is considered to be acceptable in planning terms subject to the detailed recommendation set out in section 2 (RECOMMENDATION).
- 8.72 The development would be liable for a charge under the Community Infrastructure Levy (CIL).