

1. SUMMARY OF APPLICATION DETAILS

Ref: 20/01550/FUL
 Location: 126-132 Pampisford Road, Purley, CR8 2NH
 Ward: Purley Oaks and Riddlesdown
 Description: Demolition of four detached dwelling houses and the construction of four buildings with heights ranging from two to five storeys to accommodate 66 flats; with associate vehicle and cycle parking, refuse store, hard and soft landscaping.
 Drawing Nos: 19-103-P001, 19-103-P002, 19-103-P003, 19-103-P004, 19-103-P005, 19-103-P010 Rev D, 19-103-P011 Rev B, 19-103-P012 Rev B, 19-103-P013 Rev B, 19-103-P014 Rev B, 19-103-P015 Rev B, 19-103-P016 Rev B, 19-103-P017 Rev B, 19-103-P020 Rev B, 19-103-P021 Rev B, 19-103-P022 Rev B, 19-103-P023 Rev B, 19-103-P024 Rev B, 19-103-P025 Rev B, 19-103-P026 Rev B, 19-103-P027 Rev B, 19-103-P030 Rev A, 19-103-P031 Rev A, 19-103-P032 Rev A, 19-103-P033 Rev A, 19-103-P034 Rev A, 19-103-P035 Rev A, 19-103-P036 Rev A, 19-103-P037 Rev A, 19-103-P038 Rev B, 19-103-P040, 19-103-P041, 19-103-P042, 19-103-P043, 19-103-P044, 19-103-P045 Rev A, 19-103-P046, 19-103-P050, 19-103-P051, 19-103-P055, 19-103-P056, 19-103-P057, 19-103-P060, 19-103-P061, 19-103-P062, 19-103-P063, 19-103-P065, 19-103-P066, 19-103-P068, 19-103-P069 Rev A, UA/TP1, UA/LP2, UA/LP3, UA/LP4, UA/LP5, UA/LP6, UA/LP7, UA/LP8.
 Applicant: Mr Scott Wilson – Buxworth Homes Ltd
 Case Officer: Karim Badawi

	1B 2P	2B 3P	2B 4P	3B 4P	3B 5P	Total
Existing Provision					4	4
Affordable Rent	3		19			22
Shared Ownership						
Market Housing	10	1	19	8	6	44
Total Proposed	13	1	38	8	6	66

66% of the units are proposed for Private sale; 33% of the units (32% by habitable room) are proposed for London Affordable Rent.

Number of car parking spaces	Number of cycle parking spaces
52	123

- 1.1. This application is being reported to Planning Committee in accordance with the following committee consideration criteria:
- Referred by Ward Councillor (Councillor Simon Hoar)
 - Objections above the threshold in the Committee Consideration Criteria

2. RECOMMENDATION

- 2.1. That the Planning Committee resolve to GRANT planning permission prior to the completion of a legal agreement to secure the following:
- a) Affordable housing – Block B comprising 22 units with 63 habitable rooms London Affordable Rent.
 - b) Local Employment and Training Strategy and contributions;
 - c) Financial contribution towards air quality, calculated at £6,600;
 - d) Financial contributions towards sustainable transport measures and highway improvements in the immediate area, calculated at £50,000;
 - e) Contribution to car club space, calculated at £21,050;
 - f) S278 Agreement for the implementation of the highway works;
 - g) Carbon offsetting contribution of £2,669.38;
 - h) Monitoring fee; and
 - i) And any other planning obligations considered necessary.
- 2.2. That the Director of Planning and Strategic Transport has delegated authority to negotiate the legal agreement indicated above.
- 2.3. That the Director of Planning and Strategic Transport has delegated authority to issue the planning permission and impose conditions and informatives to secure the following matters:

Conditions

1. Time limit of 3 years
2. Development to be carried out in accordance with the approved drawings and reports except where specified by conditions

Pre-Commencement Conditions

3. Construction Logistics Plan;
4. Engagement with the Environment Agency in relation to surface water flooding;

5. Archaeological Written Scheme of Investigation;
6. Phase 1 Contaminated Land Report;
7. Tree protection plan;

Pre-Commencement Conditions except for demolition and below ground work:

8. Details and samples of materials to be submitted for approval;
9. Landscaping and child play / communal amenity space and boundary treatment ;
10. Full details of cycle storage to be submitted for approval;
11. Biodiversity Enhancement Strategy;
12. Construction Environmental Management Plan;

Pre-Occupation Conditions

13. Public Art details to be submitted for approval;
14. Lighting of cycle and refuse bike stores, and basement parking to be submitted for approval;
15. Delivery and servicing plan;
16. Car park management plan;
17. EVCP to be implemented on site;
18. Energy efficiency / sustainability;
19. Secured by design (D4)

Compliance Conditions

20. Accessible homes;
21. All proposed units to have access to all amenity areas irrespective of tenure;
22. Obscure-glazed furthest south windows for Block D;
23. Obscure-glazed rear windows for Blocks C & D;
24. Car parking provided as specified;
25. Refuse/cycle parking provided as specified;
26. Visibility splays as approved;
27. Accord with the submitted Tree Protection Plan and Arboricultural Impact Assessment;
28. Accord with Conclusions and Recommendations section of the submitted Preliminary Ecological Appraisal;
29. Accord with the mitigation measures stated with the Flood Risk Assessment;
30. Accord with the mitigation and conclusion within the Air Quality Assessment;
31. Water efficiency; and
32. 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. Nesting birds in buildings;
5. Environment Agency advice to applicant regarding contaminated land, piling, drainage and disposal of soil;
6. Light pollution;
7. Requirement for ultra-low NOx boilers;
8. Thames Water informatives regarding underground assets and public sewers;
9. Informative in relation to Condition 3, 5 and 22; and
10. Any other informative(s) considered necessary by the Director of Planning and Strategic Transport.

3. PROPOSAL AND LOCATION DETAILS

Proposal

- 3.1. The proposed development involves the demolition of 4 no. detached family houses and erection of 4 no. apartment blocks, comprising 66 apartments and 52 parking spaces with associated hard and soft landscaping.
- 3.2. The proposed buildings would comprise the following:
 - Block A to the northeast corner of the site, this block would have 20 flats (16x 2b/4p and 4 x 3b5p) and 13 vehicle spaces underneath;
 - Block B to the southwest corner of the site, this block would have 22 flats (3 x 1b and 19 x 2b/4p); this block is earmarked to be fully London Affordable Rent;
 - Block C to the northwest corner of the site, this block would have 11 flats (1x1b, 8 x 3b/4p and 2 x 3b/5p) and 19 vehicle spaces underneath; and
 - Block D to the southwest corner of the site, this block would have 13 flats (9x 1b, 1 x 2b3p and 3 x 2b4p).
 - 20 spaces, including two for disabled-vehicles, between Blocks A & C
- 3.3. The proposal would have cycle parking accommodating 123 bicycles under blocks A, B and C; and a refuse store under each of the four blocks. The site plan would have a number of communal amenity areas; including landscaped areas, allotments and children play spaces.
- 3.4. During the course of the application amended plans have been received. The main alterations to the scheme have been as follows:
 - Correcting the signed certificates on the application forms;
 - Adding a rear extension at neighbouring property No.124 to the site plan;
 - Changing the clear/obscure ratio to the windows at the rear of Block C &D;

- Changes to the proposed landscape; and
- Changes to the vehicle and cycle parking layouts.



Fig. 1: Proposed Site Plan.

Site and Surroundings

- 3.5. The site comprises four detached houses on Pampisford Road, a residential street in Purley. The site slopes dramatically down from the northwest corner to the south east corner and sits on a level higher than the road by 1.5-2 metres. It connects to the road by a pedestrian walkway, with a public right of way, that runs to the front of the existing houses from No.124 to No.142; this walkway forms part of a green bank to the front of these houses..
- 3.6. Pampisford Road is a long residential street with varied character on different sections of the road. The site is surrounded by a mix of detached and semi-detached houses which are mostly 2-storey under pitched roofs with varying topography.

- 3.7. The site falls within approximately 14 minutes or 1.1km walking distance from Purley station, and 10 minutes or 750m walking distance to Purley Town Centre and has a Public Transport Accessibility Level (PTAL) of 1b. The site falls within an archaeological priority area, outside flood risk and surface water flood risk zones but in a critical drainage area.



Fig. 2: Aerial View for the site's location.

Planning History

- 3.8. There are no recent planning applications of relevance at the application site. However Members should be aware of previous pre-application enquiries as detailed below:
- 19/03576/PRE– Proposed demolition of 4 no. detached family houses and erection of 4 no. apartment blocks, comprising of 65 apartments, with associated hard and soft landscaping etc.
 - 19/05120/PRE– Demolition of 4 no. detached family houses and erection of 4 no. apartment blocks, comprising of 65 apartments, with associated hard and soft landscaping etc.
- 3.12. Applications of interest within the surrounding area are detailed below:
- 1 Wyvern Road Purley CR8 2NQ - 19/04443/FUL | Demolition of existing house and erection of 6 dwellings in two buildings with external bin and cycle store with associated parking and landscaping | Under Consideration.
 - 2 Wyvern Road Purley CR8 2NP - 20/00532/FUL | Demolition of the existing dwelling and erection of 9 dwellinghouses and associated

landscaping, refuse storage and car and cycle parking | Under Consideration

- 140 & 142 Pampisford Road - 17/05463/FUL | Erection of two storey building at rear with accommodation in roof space comprising 1 x 1 bedroom; 5 x 2 bedroom and 1 x 3 bedroom flats with associated access, 11 parking spaces, cycle storage and refuse store. | Granted 25/01/2018 (varied by 19/04619/CONR and 19/00094/CONR).
- 122 Pampisford Road Purley CR8 2NF - 18/00236/FUL | Demolition of existing two storey property, erection of two storey plus lower ground floor and roof level, creation of eight self-contained residential units (C3), new access with car parking, landscaping, refuse and cycle storage. | Granted 17/08/2018.
- 75 Pampisford Road Purley CR8 2NJ - 15/03878/P | Demolition of existing detached house; erection of a pair of two storey four bedroom semi-detached houses with accommodation in roofspace one with an attached garage and 1 two storey four bedroom detached house with attached garage; formation of vehicular access and provision of associated parking | Granted 10/11/2015.

4. SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The principle of intensified residential development is acceptable given the national and local need for housing.
- The proposal includes 30% affordable housing, in accordance with local plan requirements and is the maximum reasonable level of affordable housing currently deliverable in view of scheme viability.
- The proposal includes a policy compliant number of family units.
- The proposed design and appearance of the scheme would be acceptable; the proposed heights would not be excessive considering the steep contour levels of the site. Whilst acknowledged that the mass of built form is significantly greater than the existing structures of site, the proposal accords with the thrust of guidance contained within the Suburban Housing Design SPD.
- The living conditions of adjacent occupiers would be protected from undue harm subject to conditions.
- The proposed residential development would provide quality accommodation for future occupiers and adequate amenity provision.
- The level of parking and impact upon highway safety and efficiency would be acceptable.
- Sustainability aspects have been properly assessed and their delivery can be controlled through planning obligations and planning conditions.

5. CONSULTATION RESPONSE

- 5.1. Lead Local Flooding Authority: Agreed with the proposed SuDs and requested a condition to ensure further communication with the Environmental Agency as the site potentially falls within a ground water source protection zone.
- 5.2. Environment Agency: No comment and referred the Council to the standard advice.
- 5.3. Historic England: No objection subject to a two-stage condition prior to the commencement of any works on site.
- 5.4. Place Ecology: No objection subject to securing biodiversity mitigation and enhancement measures
- 5.5. The views of the Planning Service are expressed in the MATERIAL PLANNING CONSIDERATIONS section below.

6. LOCAL REPRESENTATION

- 6.1. The application has been publicised by 19 letters of notification to neighbouring properties, site notices and press notice.
- 6.2. The number of representations received from neighbours, a Residents' Association, a local ward Councillor and Local MP in response to notification and publicity of the application are as follows:

No of individual responses: 88 Objecting: 86 Supporting: 2

Comment: 0

- 6.3. The following issues were raised in representations. Those that are material to the determination of the application, are addressed in substance in the MATERIAL PLANNING CONSIDERATIONS section of this report.

- 6.4. **Table 3:** Issues raised by the public:

Objection	Response
<i>Principle of development Full assessment within paragraphs 8.2 to 8.13.</i>	
Overdevelopment and intensification to Pampisford Road which has potential 161 new flats replacing 8 dwellinghouses	Each application is assessed on its own merits and issues with accumulated impact on parking had been taken into account.
Proposal represents higher density than the London Plan.	The London Plan matrix is not the sole deciding factor in the application.
Restrictive covenants to the front for 126-140 Pampisford Road to maintain public access.	The proposal would maintain this public access.

Planning application 16/05758/FUL was denied for demolishing family home and due to listed building.	Incorrect, the reasons for refusal of this application did not include loss of a family home. Nonetheless, each application is treated on its own merits.
Housing crises in Croydon need affordable houses not flats	The housing need in number versus land supply translates to
Loss of a three-bedroom dwellings.	The proposal would provide 12 three-bedroom dwellings.
Flats are not needed in this location	Unclear where the opinion is based on.
FVA shows the development is not viable and not providing affordable housing	The development would provide affordable housing in accordance with Council policies.
<i>Design Full assessment within paragraphs 8.14 to 8.39</i>	
The proposal is not in keeping with the character of the area.	Officers are satisfied that the proposal reflects the character of buildings in the area as explained in the Design and Character Assessment.
The proposed massing is bulky and out of keeping with the context	The proposed design, roof shape and height would break up the massing of the proposal.
The proposed height of five-storeys is unprecedented in the area.	The proposal would be four-storeys above ground level as seen from the main road, in line with the Suburban Design Guide SPD2.
The proposal is an overdevelopment to the site.	Officers are satisfied that the proposal provides appropriate development to the site.
Development would be better as semi-detached houses	The planning application is minded with the proposed development which optimises the site's potential.
<i>Proposed Residential Full assessment within paragraphs 8.40 to 8.57.</i>	
Poor quality development	Officers are satisfied that the proposal would provide quality residential accommodation for future occupiers.
Recent lock down showed people need houses with gardens and not flats	The proposal would have suitable communal amenity areas for the use of all occupiers instead of private gardens for the use of the few.

Proposed sizes are not big enough for families	The proposed sizes would match or exceed the national sizes.
Neighbour Amenity <i>Full assessment within paragraphs 8.58 to 8.82.</i>	
Balconies should not be allowed similar to refused planning permission for a householder which denied the resident's balcony due to impact on neighbour's privacy.	The proposed balconies would be strategically placed to avoid overlooking onto neighbouring properties.
Proposed leads to loss of privacy, and overbearing impact onto neighbouring properties.	The impact of the development onto all adjoining properties would be significant.
Noise to adjoining properties	The proposal would be residential use, additional occupiers does not translate to added noise in the site.
Proposal is dominant and overbearing onto No.124.	The proposal would not have a significant impact on No.124 as per the assessment below.
Blocks A & C would result in loss of light and overlooking onto No.134	The submitted Daylight Assessment confirmed that any loss of light would be acceptable to No.134 and overlooking from Block C would be mitigated as per the assessment below.
Blocks A & C would restrict light to the solar panels at No.134.	No. 134 sits on a higher land level than the site and there is not requirement to protect lights solar panels.
Impact on amenities of adjoining occupiers	Officers are satisfied that the proposal would not impact the amenities of adjoining occupiers as per the assessment within this report.
No. 1A The Close does not want trees within its boundary which would result in loss of light of kitchen.	The trees would be proposed to stop overlooking from Block D. The applicant would be informed of the resident's wishes.
Traffic & Parking <i>Full assessment within paragraphs 8.83 to 8.105.</i>	
Potential parking overspill onto the road	The Council's Transport Strategy are satisfied with the proposed parking level.
Impact on traffic movement	The Council Transport Officer did not raise an objection to the proposal.

Impact on Ecology Full assessment within paragraphs 8.106 to 8.114.	
Destruction of habitat for local wildlife such as bats (endangered species) birds foxes and badgers.	The submitted Preliminary ecological report found no evidence of endangered species. The decision notice would include a condition to mitigate impact on wildlife and increase biodiversity of the development.
The proposal would include cutting down a high number of mature trees which would be contrary to politicians green policy.	The NPPF, the London Plan and Croydon Local Plan do not prohibit cutting down trees. The Council Tree Officer did not raise objections regarding the loss of non-TPO trees, the proposed landscape Plan would provide replacement trees with significant sizes to overcome the harm of removing existing trees.
Loss of trees would impact existing SuDs due to removal of soil.	The application includes a SuDs strategy which was agreed in principle by the Council's LLFA. Additionally, the development has high percentage of soft landscaping and all hard standing would be porous.
Other matters	
Querying if the development would be using renewable energy	Renewable energy is not a requirement within development. However, the proposal would have reduced carbon emission as per national and local policies.
Development does not show high quality materials which would impact the value of properties in the area.	Officers are satisfied of the quality of the development; nonetheless property values are not a planning consideration.
Increase in carbon footprint from additional use of water, gas, electricity and additional vehicles	The development would be built in accordance with local policies with reduced carbon emissions, additionally, the use of condition would ensure the proposed sustainable strategy is implemented and the s106 would include terms for carbon offset and financial contribution to air quality.

Impact on local infrastructure such as schools, and local surgeries.	The application would be liable for CIL payment which would contribute to delivering infrastructure to support the development of the area.
Increased sewage output.	Thames Water did not raise an objection to the proposal.
Impact on construction works onto adjoining properties in terms of waste, noise and air pollution.	The decision notice would include a Construction Method Statement to ensure minimum distribution to neighbouring properties during construction process.
Two-metre social distancing rule would not be possible due to increased densities in the area.	The two-metre rule is not for a lifetime. Nonetheless, many areas have higher densities than Croydon and still required to maintain the social distancing when needed.
Design and Access Statement was published as a draft at the beginning of the application.	Validation requirements only concerned with receiving the documents and not their quality. Re-consultation process occurred after receiving the full Design and Access Statement.

6.6. Note that a number of non-planning related concerns (eg loss of view, setting a precedent, loss of property value, etc) were also raised.

6.7. Councillor Simon Hoar referred the application to Planning Committee citing the following concerns:

- Overdevelopment of the site
- Loss of green garden space as a unjustified back garden development
- Loss of privacy for adjoining neighbours
- Lack of parking on a busy road that will force parking on to side roads
- Lack of sufficient parking given the topographical nature of the area, distance from a train station and high likelihood of car ownership.
- Poor quality design with excessive height that is out of keeping with the area

6.8. Purley and Woodcote Residents Association objected to the application, raising the following (summarised) planning related concerns:

- Loss of a family home,
- Overdevelopment of the site with the proposed development significantly increasing the built area of the existing family home
- Overdevelopment of the site resulting in inadequate amenity space for potential occupiers

- The design is totally out of keeping with the locality and surrounding townscape, as a result of its massing, form (incl height), and overall appearance.
- Detrimental to the amenity of occupiers of adjoining properties. Given the size and scale of this revised proposed development the occupiers of neighbouring properties will suffer visual intrusion, increased noise and, for those adjacent to the proposed development, loss of privacy.
- Inadequate car parking for a development of the size and scale proposed, resulting in additional on street parking, putting parking pressure on the surrounding area, and increased traffic movements so greatly endangering road safety (esp in this location on a bend in the road and close to the very busy Edgehill roundabout).

7. 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. Such determination shall be made in accordance with the Plan unless material considerations indicate otherwise. The Council's adopted Development Plan consists of the Consolidated London Plan 2016, the Croydon Local Plan (February 2018), and the South London Waste Plan 2012.
- 7.2. Government Guidance is contained in the National Planning Policy Framework (NPPF) revised 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:
- Promoting sustainable transport;
 - Delivery of housing
 - Promoting social, recreational and cultural facilities and services the community needs
 - Requiring good design.
- 7.3. The main policy considerations raised by the application that the Committee are required to consider are:
- 7.4. Consolidated London Plan 2016
- 3.3 Increasing housing supply
 - 3.4 Optimising housing potential
 - 3.5 Quality and design of housing developments
 - 3.8 Housing choice
 - 3.9 Mixed and balanced communities
 - 5.1 Climate change mitigation
 - 5.2 Minimising carbon dioxide emissions
 - 5.3 Sustainable design and construction
 - 5.7 Renewable energy
 - 5.10 Urban greening

- 5.12 Flood risk management
- 5.13 Sustainable drainage
- 5.14 Water quality and wastewater infrastructure
- 5.15 Water use and supplies
- 5.16 Waste net self sufficiency
- 5.18 Construction, Demolition and excavation waste
- 6.3 Effects of development on transport capacity
- 6.9 Cycling
- 6.10 Walking
- 6.11 Smoothing traffic flow and tackling congestion
- 6.12 Road Network Capacity
- 6.13 Parking
- 7.6 Architecture
- 8.3 Community infrastructure levy

7.5. Croydon Local Plan (adopted February 2018)

- SP1 – The places of Croydon
- 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
- DM24 – Land contamination
- DM25 – Sustainable drainage systems and reducing flood risk
- SP7 – Green Grid
- DM27 – Biodiversity
- DM28 – Trees
- SP8 – Transport and Communications
- DM29 – Promoting sustainable travel and reducing congestion
- DM30 – Car and cycle parking in new development
- DM42 – Purley

7.6. Suburban Design Guide Supplementary Planning Document (SPD) 2019

7.7. The SPD is a Housing Design Guide that provides guidance on suburban residential developments and extensions and alterations to existing homes across the borough. The SPD is a design guide for suburban developments likely to occur on windfall sites where existing homes are to be redeveloped to provide for several homes or proposals for building homes in rear gardens.

7.8. Other relevant Supplementary Planning Guidance as follows:

- London Housing SPG, March 2016
- National Technical Housing Standards, 2015
- National Planning Practice Guidance

7.9. Emerging New London Plan

- 7.10. Whilst the emerging New London Plan is a material consideration, the weight afforded is down to the decision maker linked to the stage a plan has reached in its development. The Plan appears to be close to adoption. The Secretary of State has commented on the Mayor's Intend to Publish version and so it would appear to be nearing adoption.. Therefore, the New London Plan's weight has increased following on from the publication of the Panel Report and the London Mayor's publication of the Intend to Publish New London Plan. The Planning Inspectors' Panel Report accepted the need for London to deliver 66,000 new homes per annum (significantly higher than existing adopted targets), but questioned the London Plan's ability to deliver the level of housing predicted on "small sites" with insufficient evidence having been presented to the Examination to give confidence that the targets were realistic and/or achievable. This conclusion resulted in the Panel Report recommending a reduction in London's and Croydon's "small sites" target.
- 7.11. The Mayor in his Intend to Publish New London Plan has accepted the reduced Croydon's overall 10 year net housing figures from 29,490 to 20,790 homes, with the "small sites" reduced from 15,110 to 6,470 homes. Crucially, the lower windfall housing target for Croydon (641 homes a year) is not dissimilar to but slightly larger the current adopted 2018 Croydon Local Plan target of 592 homes on windfall sites each year.
- 7.12. It is important to note, should the Secretary of State support the Intend to Publish New London Plan, that the overall housing target in the New London Plan would be 2,079 new homes per annum (2019 – 2029) compared with 1,645 in the Croydon Local Plan 2018. Therefore, even with the possible reduction in the overall New London Plan housing targets, assuming it is adopted, Croydon will be required to deliver more new homes than our current Croydon Local Plan 2018 and current London Plan (incorporating alterations 2016) targets.
- 7.13. For clarity, the Croydon Local Plan 2018, current London Plan (incorporating alterations 2016) and South London Waste Plan 2012 remain the primary consideration when determining planning applications.

8. MATERIAL PLANNING CONSIDERATIONS

8.1. The principal issues of this particular application relate to:

- The principle of the Development
- Affordable Housing and Housing Mix
- The Design and its Impact on the Character of the Area
- The Quality of the Proposed Residential Accommodation
- Impact on Neighbouring Amenity
- Impact on Highways, Parking and Refuse Provision
- Impacts on Trees and Ecology

- Sustainability and Environment
- Archaeology
- Environmental Health

THE PRINCIPLE OF DEVELOPMENT

- 8.2. Proposed Land Use: Paragraph 11 of the NPPF 2018 applies a presumption in favour of sustainable development which means approving development proposal which accords with an up-to-date development plan without delay. Paragraph 68 acknowledges the contribution of small and medium size sites can make in meeting the housing requirements and supports the development of windfall sites.
- 8.3. The above policies are clearly echoed within Policy SP2.1 of the Croydon Local Plan (2018) (CLP 2018) while Policy SP2.2 commits to the delivery of 10,060 homes across the borough's windfall sites.
- 8.4. The site is a windfall site which could be suitable for sensitive renewal and intensification. The proposal is for a residential scheme within a residential area; it would comprise four buildings to accommodate 66 flats which would accord with national and local policies. Accordingly, the proposed land use would be acceptable in principle.
- 8.5. Loss of Existing Land Use: Policy DM1.2 of the CLP (2018) permits residential redevelopment where it would not result in the net loss of three-bedroom homes or the loss of homes smaller than 130 sqm. Only one of the existing homes is a three-bedroom dwellinghouse and all of them exceed 130 sqm. In size. Fourteen three-bed homes would be provided. Accordingly, the proposal would not be contrary to Policy DM1.2 and would be acceptable.
- 8.6. Density: The site falls in a suburban setting under The London Plan (2016) terms and has a PTAL score of 1b. Table 3.2 of The London Plan identifies the optimum sustainable residential quality density; this table sets the density for such setting at maximum 200 hr/ha and 75 u/ha. The proposal would result in a density of 419 hr/ha and 137u/ha. Officers note the exceeded density when compared with the London Matrix. However, the London Plan indicates that it is not appropriate to apply these ranges mechanically, and also provides sufficient flexibility to support higher density schemes (beyond the density range) where they are acceptable in all other regards such as design, quality of proposed accommodation and impact on neighbouring amenity and traffic.
- 8.7. In summary, the proposed residential use and its density would be acceptable in principle. The proposal would accord with the National and Local requirements and would optimise the delivery of additional housing in the borough.

AFFORDABLE HOUSING AND HOUSING MIX

- 8.9. 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.

- 8.10. 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 but that through dialogue with Registered Providers could provide 30% of the units as London Affordable Rent (LAR) homes. This appraisal was subject to a third party review during the course of the application who disagreed with the original viability findings and concluded that the scheme would be viable to support 30% of units as affordable housing and agreed with their affordable housing statement submitted with the application.
- 8.11. The lack of shared ownership units within the scheme would follow Policy SP2 as this affordable housing offer is made under an agreement with a registered provider. As 30% of the homes would be affordable, no review mechanism is required in this instance.
- 8.12. Housing Mix: Policy DM1.1 of the Croydon Local Plan (2018) requires major developments to have a minimum amount of three-bedrooms in accordance with Table 4.1 except for where there is an agreement with an approved registered provider for a specific mix; this policy also allows an element of two-bedroom/four-person dwellings as a substitute. Table 4.1 of Policy DM1.1 states that a suburban setting with PTAL 1b should have 70% minimum percentage of three-bedrooms.
- 8.13. 52 of the 66 units (approx. 79%) would be family units, including 2bed-4person units, and the affordable units are in accordance with a mix required by the registered provider, therefore meeting the policy requirements.

THE DESIGN AND ITS IMPACT ON THE CHARACTER OF THE AREA

- 8.14. Pampisford Road is a long residential street, with varied character on different sections of the road. The site is surrounded by a mix of detached and semi-detached houses which are mostly two-storey under pitched roofs. The character of the area does not show high levels of uniformity to the design of the houses; however, they do show shared design characteristics, including tiled pitched roofs, brick and render elevations, and substantial soft landscaping. There is a substantial landscaped verge in front of the site, with a footpath leading to the adjacent houses, this ties in with other buildings where most sit behind landscaped gardens with low boundary walls and large trees.
- 8.15. Pampisford Road has experienced several residential intensification developments at its northern and southern ends, with blocks of flats up to four storeys having replaced family sized homes.



Fig.3: Proposed Site Plan

- 8.16. Pattern and Layout: Policy DM.10 of the CLP (2018) states that proposals should be of high quality, respect the development pattern, layout and siting.
- 8.17. The site sits approximately 1.5 metres higher than Pampisford Road; the site's boundary includes a landscaped bank and a public pathway which runs to the front of No.124 to No.148 and connects with Pampisford road through a number of staircases from the pavement. The proposal would comprise two frontage blocks onto Pampisford Road, Blocks A & B, and two backland blocks to the rear of the site, Blocks C & D.
- 8.18. The frontage blocks would sit behind the existing bank; each block is designed as semi-detached pairs with central circulation cores, which would reflect the existing presence of four houses on the site. The proposed vehicular access would run through the two blocks and their ground-floor level fronting the road would comprise front private front gardens and habitable rooms activating the frontage. The design of the proposal would maintain the public pathway to the front and the landscaped bank; this in turn would provide a sense of seclusion to the front-facing units from the road.

- 8.19. The main vehicular and pedestrian access to the development would sit between the frontage blocks giving on to parking beneath blocks A and B and between block A and C. A certain amount of parking is considered necessary as discussed later in the report. To minimise its impact on the proposed site plan and opportunities for landscaping, the majority of parking is located beneath proposed buildings. Additionally, the courtyard design of the surface parking and the distinction of the vehicular movement areas from the pedestrian areas, and building entrances, would be well balanced when compared with the scale of needed parking in the proposal.
- 8.20. The design would show a clear hierarchy to the blocks and their openings, with main public entrances to their frontages and secondary entrances onto the communal areas. The blocks would be slightly angled to address the irregular positioning of the existing adjoining houses, and to reflect the site's topography. The proposal would provide clear distinction between semi-private garden spaces on ground floor levels with good relationships to the internal spaces and a balance between activated frontages and privacy for residents through thought-out landscaping elements. The connected landscape would provide a number of different communal and private areas for future occupiers such as private gardens behind Block C, allotment areas behind Block D, public art zone, children play spaces and biodiverse planting areas.
- 8.21. Considering the above, the proposed site plan would provide a legible layout with minimal leftover spaces and reduced interaction between vehicular and pedestrian movements; in addition to high quality public realm with well-defined public and private spaces. The proposed pattern would provide distinctive blocks with clear entrance hierarchy and a nod to existing pattern of development in the vicinity. Accordingly, the proposed pattern and layout would be acceptable and in line with DM10.
- 8.22. Scale and Height: Policy DM.10 of the CLP (2018) states that proposals should be of high quality, seeking to achieve a minimum height of 3 storeys and should respect...the scale, height, massing, and density.
- 8.23. Figure 2.10c from Policy 2.10 of the Suburban Design Guide SPD (2019) (SDG (2019)) states that: *Where surrounding buildings are predominantly detached dwellings of two (2) or more storeys, new developments may be three (3) storeys with an additional floor contained within the roof space or set back from the building envelope below.* Figure 2.10d of the same policy states that: *'Where surrounding buildings are predominantly single storey, new development should seek to accommodate a third storey within the roof space'*

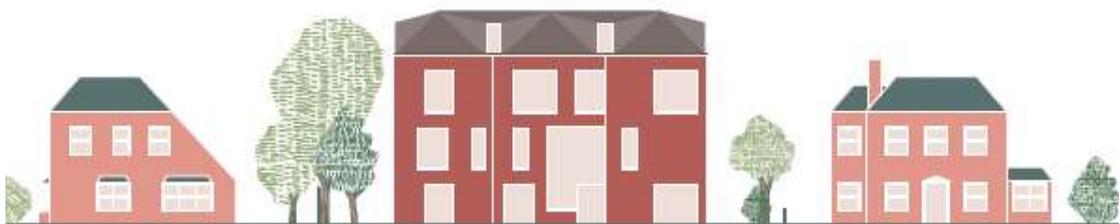




Fig. 4: Figure 2.10c and Figure 2.10d of the SDG (2019).

- 8.24. The SPD2 also outlines that where a basement is partially concealed and not fully visible from the street, there is scope for additional accommodation at lower level as this will not be read as a full storey in the streetscene. The site is concealed from Pampisford Road by higher topography, hedge and retaining wall. The topography of the area slopes from north to south; No.134 to the north is a bungalow with accommodation in the roof space while No.124 to the south is a two-storey detached dwelling. The proposal is at a height of 3 storeys at the border with neighbouring properties 134 and 124 Pampisford Road, with a sloping roof towards the later. Through utilisation of the changing topography and the width of the site, the proposal would accommodate an additional fourth storey and concealed lower ground levels which accommodates parking in Block A and accommodation in Block B.
- 8.25. The undulating pitched roof form is a contemporary reinterpretation of prevailing hipped roofs along the street, and would allow the massing to respond to the topography, negotiate between the neighbouring buildings and appear contextual to the surroundings. The overall roof form would follow the natural sloping of the road; the varying eaves and ridge heights would also follow the hierarchy of each block's location along the façade and the height of the adjoining properties along the road.
- 8.26. The SPD2 section 2.15 outlines that, where proposals are built across boundaries, it is important that the design responds to the gap in built form that historically existed. As outlined in the DAS, the street-facing massing is separated into two blocks, each with an angled step in the elevation, building line and roof height that serves to differentiate the massing and maintain the plot rhythm of the original development pattern of the existing four detached dwellings on the site. This respects the broader pattern of buildings and plots along Pampisford Road.



Fig.5: Sectional Elevation onto Pampisford Road for Block A & B.

- 8.27. The rear blocks would be lower in height at 2-3 storeys, responding to the topography, with an additional lower ground level to block C which accommodates the undercroft parking. The blocks are flat roofed which further ensures their subservient appearance to the frontage blocks in height.



Fig.6: Sectional Elevation for Blocks C & D.

- 8.28. Considering all the points raised above, the overall scale, mass and height of the proposal would be appropriate to its setting, would be acceptable and in line with DM10.
- 8.29. Articulation and Materials: Paragraph 127 of the NPPF states that: '*Planning policies and decisions should ensure that developments...are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities)*'.
- 8.30. Policy DM.10 of the CLP (2018) states that proposals should respect the appearance, existing materials and built and natural features of the surrounding area.
- 8.31. The proposed fenestration would comprise a language of punched openings within a continuous brick surface. The window opening proportions would provide a contemporary reinterpretation of the existing buildings on the site, which are typical of the street. The entrances use a language of textured brick and variation from the buildings predominant fenestration design to distinguish themselves and improve visibility and legibility for visitors and residents. The stacking of the balconies would follow the advice of the PRP for more economical construction, less cluttered elevations and clarity in the fenestration design.
- 8.32. The proposed brick materiality would use a warm, mottled, buff brick which would respond to varying tones of buff brick present on developments that have come forward along Pampisford road. The brick is also fairly rough and textured which will soften the appearance of the building and eradicate any concerns associated with smooth brick which would result in a monolithic appearing building.
- 8.33. The proposal would use this brick in a number of different details within the building such as projecting bricks to highlight entrances, perforated brick to provide integrated ventilation to the undercroft parking, lintel soldier course of brickwork to the window openings. This would provide a subtle but effective additional level of architectural depth to the fenestration design.
- 8.34. The proposed brick for the landscape features would be a darker, earthier tone of brick which would complement the buildings material while ensuring contrast to avoid an overbearing and monotonous use of the materials on site.



Fig.7: CGI showing Examples of Brick Features in Block D.

- 8.35. **Landscape:** Landscaping around new development in suburban areas is a critical part of retaining the sense of character when these developments are introduced. Therefore it is essential that the landscaping strategy is well thought through and robust. The proposal would retain the landscaped frontage and would increase the landscaping along the street frontage which would be an added public benefit for the scheme.



Fig.8: CGI showing the front Landscape Area.

- 8.36. The proposed play provision through natural play structures integrated throughout the communal amenity areas would avoid creating segregated play areas. Thus ensuring flexibility and mixed-use of communal spaces through a combination of seating, play and landscaping that caters for different ages. This multi-use of the communal areas would also include allotments and open spaces.

- 8.37. The proposed retaining walls, lightwells and any handrails would form part of the landscaping to mitigate their visual impact and harmonise with the broader landscaping.
- 8.38. The decision notice would include a condition for 1:10/1:5 design details of the proposed entrance design feature including material specification. This would provide full clarity regarding the entrance design of the driveway. In addition to 1:10/1:5 details and material specifications for the public art.
- 8.39. In summary, the design of the proposal respects the broader pattern of buildings and plots along Pampisford Road. The street-facing massing would be articulated to make reference to the existing four buildings and plots on the site and to continue the rhythm and scale of the street. The undulating pitched roof form is a contemporary reinterpretation of prevailing hipped roofs along the street, and would allow the massing to respond to the topography, negotiate between the neighbouring buildings and appear contextual. The landscaping would be a crucial part of retaining a sense of character along the streetscene, and the proposal would retain the hedging along the frontage and ensure the provision of ample soft landscaping. The proposed application has developed throughout pre-application stage and planning application negotiations and is broadly supported in design terms. Considering all the points raised above, the proposal would be appropriate to its setting, would be acceptable and in line with DM10.

The Quality of the Proposed Residential Accommodation

- 8.40. Internal Areas: Policy SP2.8 of the CLP (2018) states that the Council would require new homes to achieve the minimum standards set out in the Mayor of London Housing Supplementary Planning Guidance (SPG) and National Technical Standards (2015) (NTS (2015)) or equivalent.
- 8.41. The proposal would comprise single-floor units across four buildings with a mix of one-, two- and three-bedroom units. All units would achieve or exceed their minimum respective sizes as set out in the NTS (2015). Additionally, the proposed layout for the scheme would provide a legible development for the benefit of the end user. Each building would have one access core which would serve up to five units.
- 8.42. Officers note that the site's topography and the proposed layout resulted in seven flats within Blocks A, B & D having below-ground accommodation for parts of their areas. A sunlight and daylight assessment is provided for all proposed units which used the average daylight factor (ADF) method, to determine natural internal luminance (daylight) which takes into account such factors as window size, number of windows available to the room, room size and layout, room surface reflectance (which is often a significant element of the calculations), and the angle of visible sky reaching the window.
- 8.43. The daylight assessment concluded that all units, including those with partial basement accommodation would meet the BRE standards. The above calculations assumed that the flats would have a white ceiling, cream walls and mid-grey carpet or wooden floor.

- 8.44. The proposed floor layouts would provide a simple floorplan per flat; all private amenity would connect to the main living spaces of each flat. All proposed internal rooms within each flat would have an appropriate size respective to its end-user. The proposed angled-shapes to the blocks and their setbacks would translate to a minimum number of single-aspect units; only 17 out of the 66 flats would sit in the middle of Blocks A, B & D and could be seen as single-aspect. However, these units face east or west would contain corners around their balcony which would give an opportunity for dual-aspect fenestration.
- 8.45. Guidance 2.9 of the SDG (2019) states that new to new dwellings' separation distance should be 12 metres. The proposed layout would maintain this distance between the front and rear elevations of Blocks A-C and Blocks B-D. Officers note that the side elevations would fail to achieve 12 metres separation distance; however, most windows onto these side elevations would not be primary and could have limited-opening windows. Additionally, the proposal took careful consideration to de-align the windows of the bedrooms to avoid inter-overlooking between Blocks A & B. Accordingly, the proposed relationship between the internal spaces of all the blocks would be acceptable.
- 8.46. Considering the above, the proposed accommodation would be acceptable in accordance with Policy SP2.8.
- 8.47. Accessibility: London Housing SPG (2015) states that 90% of new-build housing should meet Building Regulation requirement M4(2) 'Accessible and Adaptable Dwellings' with the remaining 10% meeting Building Regulation requirement M4(3) 'Wheelchair User 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.
- 8.48. Each block core would have a lift, all distribution corridors and units would maintain a step-free access which would allow all units to be adaptable in accordance with M4(2) which requires a step-free access to the WC and other accommodation within the entrance storey of any unit. The proposed landscape would include ramped access, in accordance with Building Regulations, to all parts of the communal amenity areas including widened pathways around the allotments and having some of these allotments as raised pots for the ease of access for wheelchair user.
- 8.49. Further to the above, the submitted drawings identified seven M4(3) flats of different sizes across Blocks A, C and D. These units would be two- and three-bedroom units; their drawings included furniture, wheelchair-turning circles and wheelchair-user bathrooms to prove their function and usability as M4(3) units. This would be in excess of the minimum policy requirement and is a positive element of the scheme.
- 8.50. Considering the above, the proposal would provide a sufficient number of wheelchair user dwellings in addition to providing fully future adaptable dwellings across the scheme in accordance with the London Housing SPG (2015) and the site is fully accessible in a step free manner which is a significant positive for a scheme of this nature on a sloping site.
- 8.51. Amenity Areas and Play Space: Policy DM10.4 of the CLP (2018) states that all new residential development will need to provide private amenity space, this space should be functional with minimum depth of 1.5 metres and a minimum

area of 5 sqm per 1-2 person unit and an extra 1 sqm per extra occupant thereafter.

- 8.52. Most of the proposed units would have a minimum of 5 sqm, for one-bedroom units, which would increase depending on each unit's location within the floor plan, and the articulation of the design. All of the units would meet or exceed the minimum required standard private amenity areas in accordance with Policy DM10.4.
- 8.53. In addition to the private amenity areas, the development would have two courtyards between Blocks B-D and Blocks C-D and an allotment area behind Block D. All these areas in addition to the overall landscape walkways would act as communal amenity spaces for the enjoyment of the future occupiers.



Fig.9: CGI showing the Allotments Area.

- 8.54. Policy DM10.4 also states that all flatted developments must provide a minimum of 10 sqm per child of new play space as set out in Table 6.2, this calculation will be based on the amount and tenure of affordable housing and the sizes of the proposed units. As per paragraph 8.12 above, Block B would comprise the affordable housing units in the development.
- 8.55. The calculations in accordance with Table 6.2 concludes that 248 sqm would be required as play space for the scheme. The proposal would include a children's natural play space between Block C & D with an area of 133sqm and a second children's play space with an area of 196sqm between Blocks B & D. Both spaces would exceed the requirement and both would have playful landscape furniture that could be used by children and adults, bringing multi use to these spaces and a wider benefit to the future occupiers.



Fig.10: Visuals of the Proposed Playspaces and Landscape.

- 8.56. Considering the above, the proposal would provide adequate amenity and play space for the future occupiers in accordance with Policy DM10.4.
- 8.57. In summary, the proposal would provide adequate, sustainable accommodation for future occupiers in terms of legibility, unit size, habitable room's adequacy, private and communal amenity spaces in accordance with London Housing SPG (2015) and Croydon Local Plan Policies SP2 and DM10.

IMPACT ON NEIGHBOURING AMENITY

- 8.58. Policy DM10.6 of the CLP (2018) states that the Council will ensure proposals would protect the amenity of occupiers of adjoining buildings and that proposals 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.
- 8.59. Guidance 2.9 of the SDG (2019) states that careful design can mitigate the inevitable increase in overlooking and impact on the outlook occurring from developments and the evolution of the suburbs. Adding that a greater level of protection will be given to the first 10 metres of a neighbouring garden, and that the design should present obscure, diagonal or oblique views if overlooking onto this space occurs.
- 8.60. Guidance 2.9 of the SDG (2019) discusses massing and relationship between buildings. It states that there should be 18 metres between a new and existing third party dwelling. This distance was quoted to prevent overlooking; however can be used as a guideline for overbearing impact.
- 8.61. Paragraph 2.9.1 of the SDG (2019) states that when considering the relationship with other built form, applicants should ensure that there is not unreasonable loss of light for neighbours.
- 8.62. The site is adjoining the following properties, each will be assessed accordingly, No. 124 Pampisford Road, No. 134 Pampisford Road, Nos. 2 & 3 Hillground Gardens, No.3 The Close, Nos. 1 & 2 The Close and No.1A The Close



Fig.11: The proposal and its adjoining properties

i. No.124 Pampisford Road:

- 8.63. This property sits to the south of the site at a lower topography level; the site is adjacent to a two-storey side and rear extension and the property does not have any side windows overlooking the site. Block B would have a separation distance of 2.45 metres from the shared boundary and Block D would have a separation distance of approximately 20 metres from the most rear building line of the property.
- 8.64. Overbearing Impact: the topography of the site results in the ground floor of this property siting below the shared boundary, the main assessment would be concerned with its first-floor windows and rear garden. Block B would almost align along the front building line of this property and extend approximately 3.7 metres beyond its rear first-floor extension avoiding any encroachment on the 45⁰ line of the extension's window. Accordingly, the proposal would not result in an overbearing impact on its residents. Block D, to the rear, would be a similar height to 124 and approx. 21m away, and so have a comfortable relationship in terms of an overbearing impact.

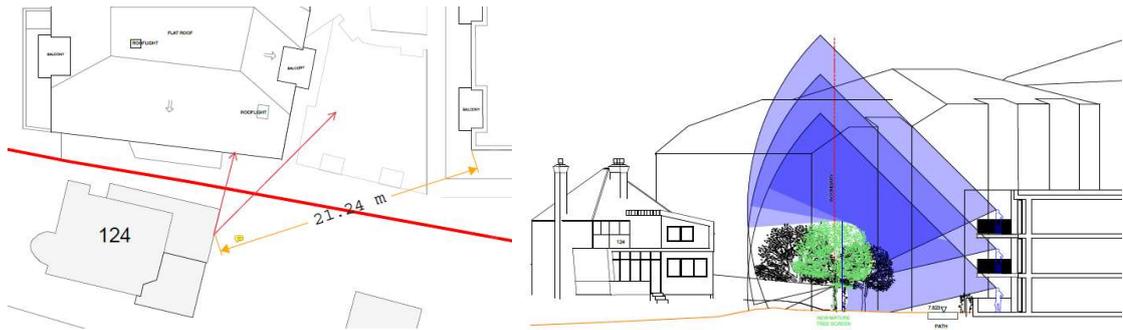


Fig.12: The relationship between Block B & D with No.124.

- 8.65. **Loss of Sunlight and Daylight:** The location of this property to the south of the site would normally protect it from a significant loss of sunlight and daylight. The submitted sunlight and daylight analysis didn't take in account the extension and only assessed the original window. Nonetheless, the assessment showed marginal impact on this window and by default, the extension's window would have similar or even less impact from the proposal, which would be acceptable.
- 8.66. **Overlooking:** Block B would not result in overlooking onto its internal spaces and Block D separation distance would eradicate any overlooking concerns within the internal spaces. The proposal would also have a line of trees along the shared boundary which would stop direct overlooking onto the rear gardens as per the image below where the blue colour indicate open views from the nearest balconies. Additionally, the nearest balconies would have privacy screens to their south end. On balance, the combined factors of separation distance, topography changes and overall limited height of Block D would all limit any significant potential overlooking in the case of landscape barrier failure. Accordingly, the proposal would not have an adverse overlooking impact as per the image below.

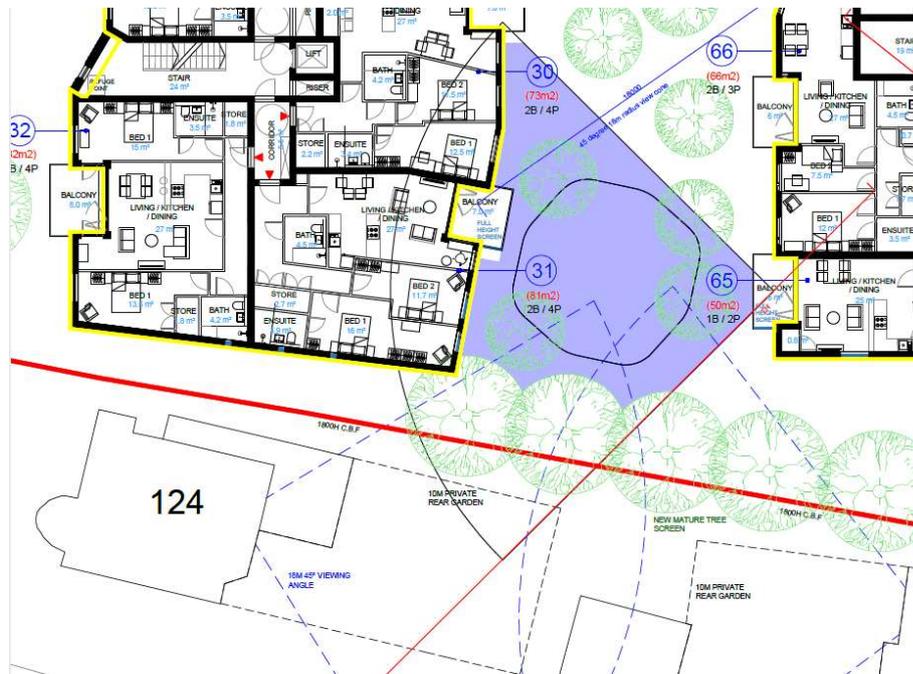


Fig.13: Typical overlooking study onto No.124, blue colour represent unrestricted views.

ii. No.134 Pampisford Road:

- 8.67. This property sits to the north of the site at a higher topography level and doesn't have any primary side windows overlooking the site. Block A would have a separation distance between 1.3-2 metres from the shared boundary and Block C would have a separation distance of approximately 27 metres from the most rear building line of the property.
- 8.68. Overbearing Impact: Due to topography, this property sits higher than site and the nearest bulk of Block A would have a similar ridge height. Block A almost align with its front building line and exceed the rear building line by approximately 4 metres. Nonetheless, Block A would avoid encroaching on the 45⁰ line of the rear windows of this property due to the angle it is set at as per the image below.



Fig.14: The relationship between Block A & C with No.134.

- 8.69. Loss of Sunlight and Daylight: The submitted daylight assessment considered the impact of the closest windows, front and rear, to the shared boundary. This assessment concluded that these windows will see a reduction of 1% to 4% from their existing vertical sky component condition. This would represent less than minor impact and would be acceptable.
- 8.70. Overlooking: Block A would align with the side walls of this property and the separation distance from Block C would eradicate any concerns with direct overlooking onto the internal spaces. Furthermore, the angle of the property in comparison with Blocks A & C would reduce the amount of direct overlooking onto its rear garden; in addition to the proposed line of trees along the boundary. Accordingly, the proposal would not have an adverse overlooking impact onto as per the image below.

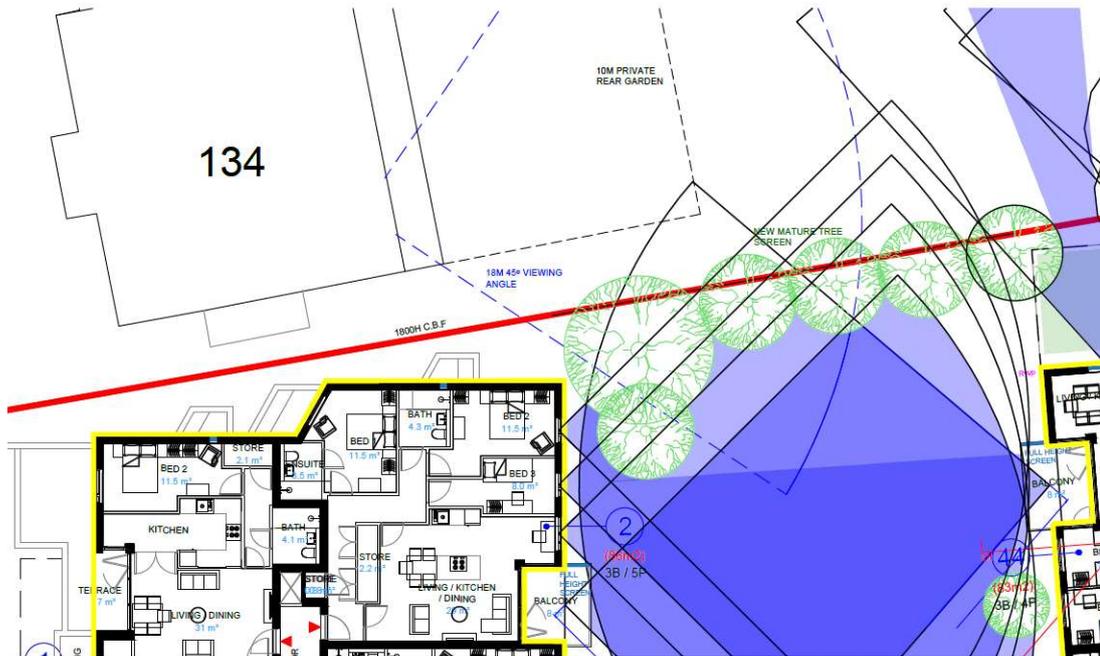


Fig.15: Typical overlooking study onto No.134, blue colour represent unrestricted views.

iii. Nos. 2 & 3 Hillground Gardens:

- 8.71. These properties sit to the northeast corner of the site at a higher topography level. Block C would have separation distances of approximately 17 and 15 metres to their rear elevations and the main impact would be in relation to overlooking onto their rear gardens.
- 8.72. Overbearing Impact: The distance between Block C and these properties would be equal to or marginally less than the SPD guidance distance of 18 metres between existing and new blocks at their nearest point. However, the geometry of the two blocks means that only a very small corner of the proposed building would be this close. Additionally, the topography of the site would result in a two-storey appearance for Block C with a setback top floor that would sit at a distance of 21 metres or more. Accordingly, Block C would not result in a significant overbearing impact to these properties, particularly as the boundaries would have thick tree coverage which would soften their outlook.

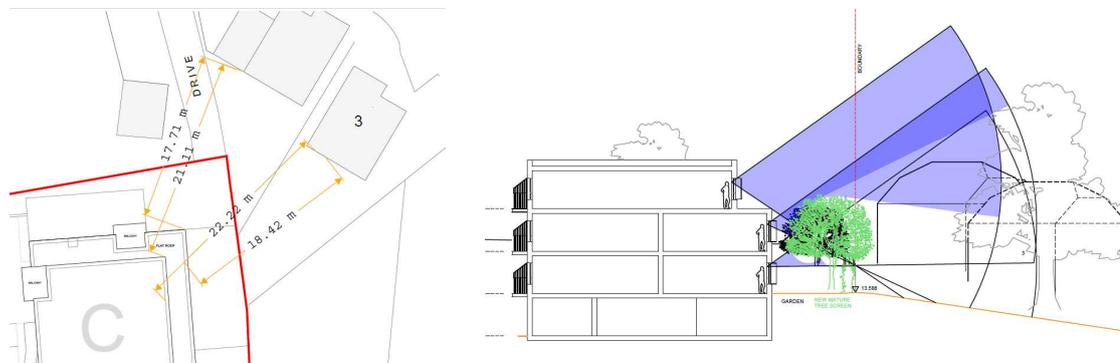


Fig.16: The relationship between Block A & C with No.2&3 Hillground

- 8.73. Loss of Sunlight and Daylight: The submitted daylight assessment considered the impact of all rear ground-floor windows in these properties. This

assessment concluded that these windows will see a reduction of 7% to 8% from their existing vertical sky component condition. This would represent less than minor impact and would be acceptable.

- 8.74. Overlooking: Block C would have a series of opaque window sections and obscuring fins to its rear fenestration to minimise their direct outlook, in addition to a new row of trees along the shared boundary and the separation distance from Block C. The combined factors of obscuring measures, the angle of Block C away from the rear garden policy-protected areas would significantly minimise overlooking onto the amenity of these properties on its own merits. The proposed trees along the boundary would be a secondary measure to further eradicate such concerns, as per the image below. Accordingly, the proposal would not have an adverse overlooking impact onto these properties and the relationship would be acceptable.

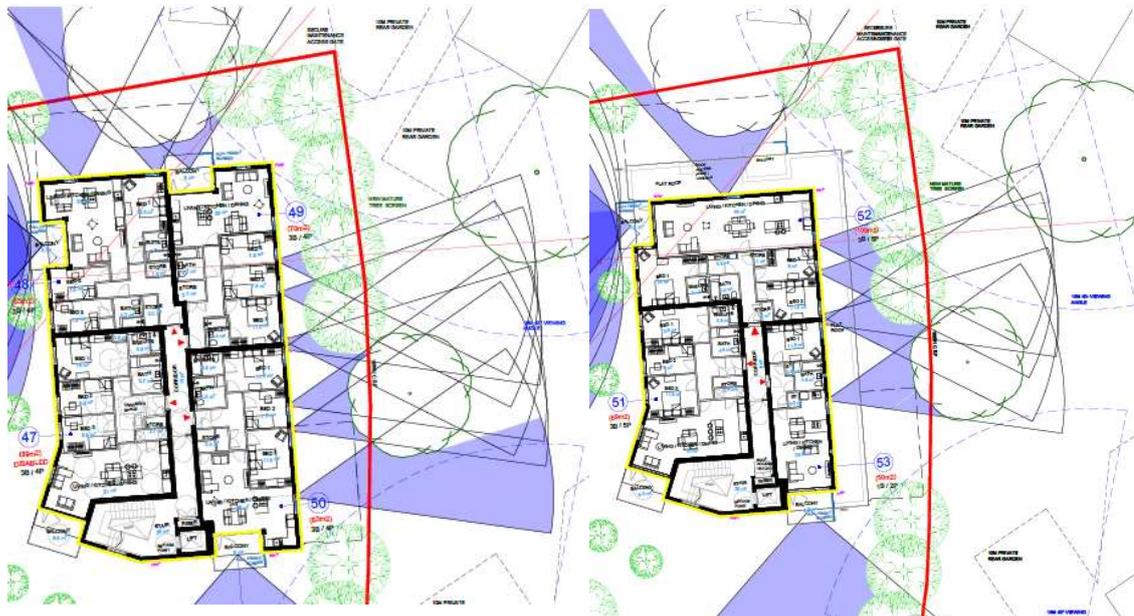


Fig.17: Overlooking study from the 3rd & 4th floors of Block C.

iv. No.3 The Close:

- 8.75. This property is shown as No.5 on the submitted site plans by error, it sits to the east of the site along the north edge of Blocks D at a higher topographic level. The combined factors of separation distance, the overall two-storey height of Block D and the property's location to the east of the site would eradicate concerns with direct loss to its sunlight/daylight levels.
- 8.76. Overbearing Impact: The separation distance from Block D and the positioning of the two buildings would eradicate concerns with overbearing impact. Block C would site at a distance of 22 metres from the 45⁰ line of its rear fenestration, this separation distance would comprise new trees along the shared boundary. Accordingly, the proposal would not have a significant overbearing impact onto this property.

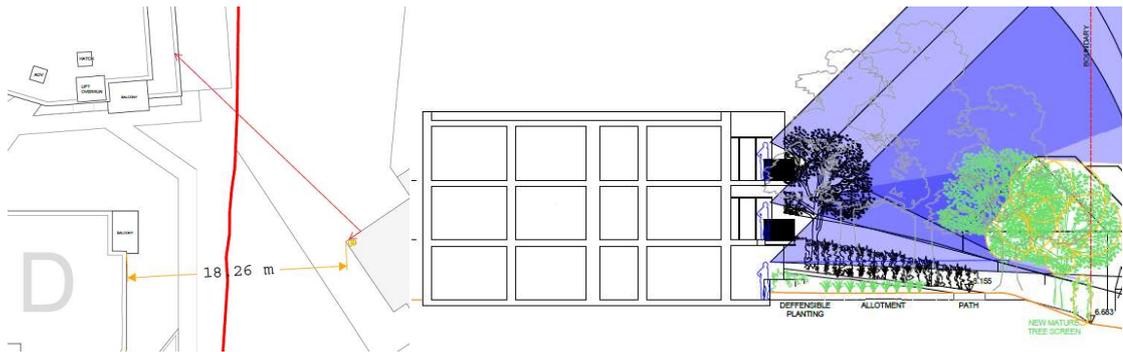


Fig.18: The relationship between Blocks C & D with No.3.

- 8.77. **Overlooking:** Block C would sit away from the first 10-metres protected garden amenity area. Block D would have a series of opaque window sections and obscuring fins to its rear fenestration to minimise their direct outlook, in addition to a new row of trees along the shared boundary. These measures would be sufficient to reduce the overlooking impact onto the private amenity of No.3, particularly as the 10-metres protected garden amenity would be far from the viewing cones as represented by the image below.

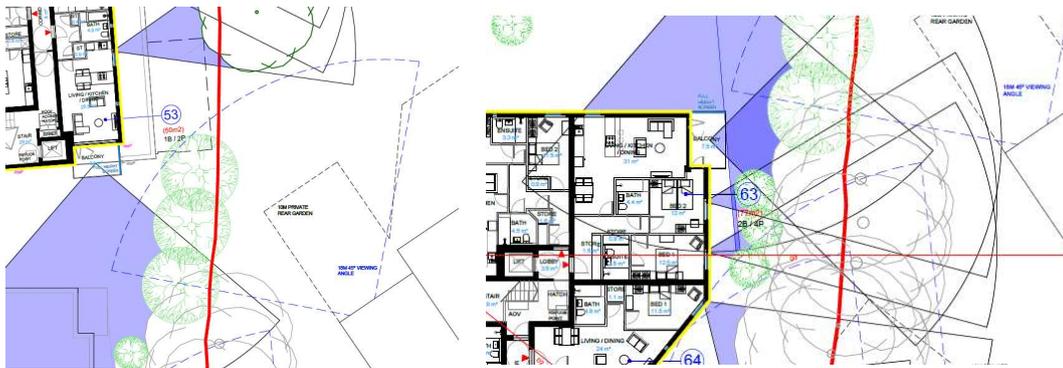


Fig.19: Overlooking study from Blocks C & D, blue colour represent unrestricted views.

v. Nos. 1 & 2 The Close

- 8.78. These properties sit to the east of the site at a higher topography level. Block D would have a separation distance of 17.7 metres from the rear elevations of these properties. The combination of the separation distance and topography would eradicate overbearing concerns; the location of these properties to the east of the site would eradicate concerns with loss to their sunlight/daylight levels.

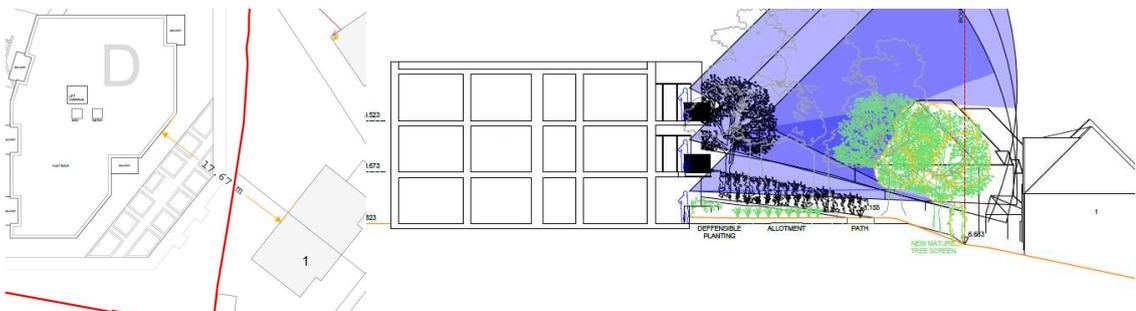


Fig.20: The relationship between Blocks C & D with No.1-2 The Close.

- 8.79. Overlooking: Block D would sit at an approximate distance of 18 metres as per the recommendations of the Suburban Design Guide SPD2 (2019) for distances from new to the rear of existing properties, noting that this distance would naturally include the rear garden for the existing property. Property No.2 The Close has mature trees to the rear of its garden which would be retained. Property No.1 has a smaller garden which is partially obscured by said trees and the proposal would continue tree planting along the boundary complimenting the existing row of mature trees.
- 8.80. Block D would have a series of opaque window-sections and obscuring fins to its rear fenestration, these measures would direct views either away from the rear of these neighbouring properties or towards the existing mature trees. There would be some overlooking of the protected section of the rear garden of no 1 but, given that the protected section goes all the way to the communal boundary (due to the depth of the plot) this is considered to be acceptable in principle. Furthermore, Block D would sit at a higher topography level than these properties. On balance, the combined factors of separation distance, topography, obscure measures, existing and proposed landscaping would reduce signification overlooking impact to these properties and their rear garden as per the image below. Accordingly, the proposal would not have a significant overbearing impact onto this property.

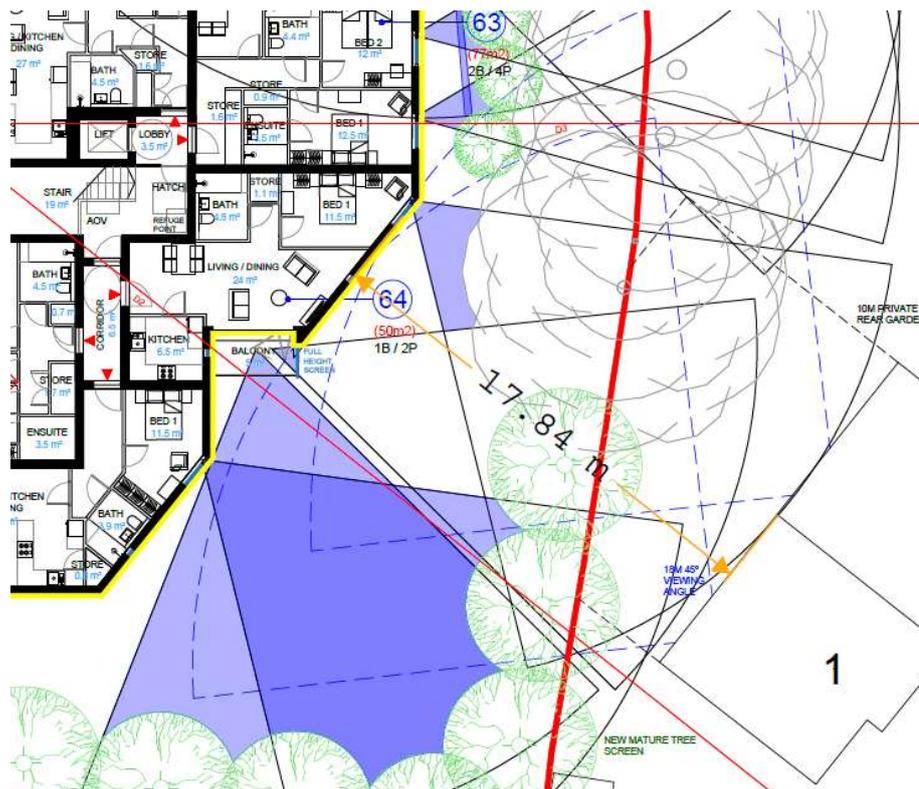


Fig.21: Overlooking study from Blocks C & D, blue colour represent unrestricted views.

vi. No. 1A The Close

- 8.81. This property sits to the south of the site to the rear of No.124, its plot was part of the original rear garden for No.124 Pampisford Road, at a lower topography level. Block D would have a separation distance of approximately 10 metres to the side of this property and would not encroach the 45° line of its nearest

window. Furthermore, Block B would site a distance of approximately 25 metres, outside the 18-metres SPD2 guidance (see paragraph 8.35). The combined factors of separation distances, trees along the shared boundary, lack of clear primary windows at Block D overlooking this boundary and the change in topography would eradicate any overbearing and overlooking concerns onto the amenity of this property. Additionally, the location of the property to the south of the site would naturally mean lack of significant impact onto their daylight levels.

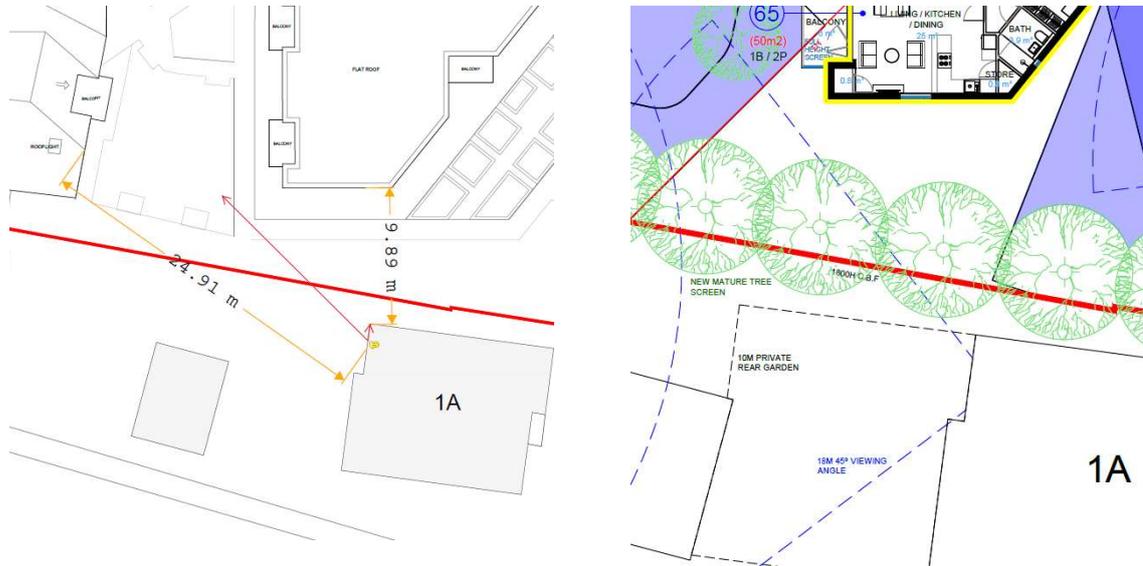


Fig.22: The relationship between Blocks C & D with No.1A showing the separation distances and lack of side windows at Block D.

- 8.82. In summary, the proposal would not result in a significant adverse impact on adjoining neighbouring properties in terms of loss of privacy, overbearing impact or loss of sun and daylight, as per Croydon Local Plan (2018) Policy DM10.6 and the Croydon Supplementary Guidance (2019).

IMPACT ON HIGHWAYS, PARKING PROVISION & WASTE MANAGEMENT

- 8.83. Highway Safety: Policy DM30 of the CLP (2018) states sustainable growth in Croydon would require new developments to ensure movement of pedestrians, cycles and emergency services is not impeded by the provision of car parking.
- 8.84. The site fronts Pampisford Road which is a two-way, single carriageway road running in a north/south alignment and subject to a 20mph speed limit. The road is circa 9 metres wide within the vicinity of the site, made up of 3.5- metres running lanes and 2-metres hatching along the centre. The area has steep topography, the site has pedestrian access only from Pampisford Road comprising steps for residents to walk up before accessing their property.
- 8.85. The proposal would provide a 6-metres wide vehicular access via a priority junction directly from Pampisford Road. The location of the proposed access falls within a 20mph speed restriction and the proposal would provide the

required 2.4m x 25m visibility splays, in accordance with Manual for Streets.

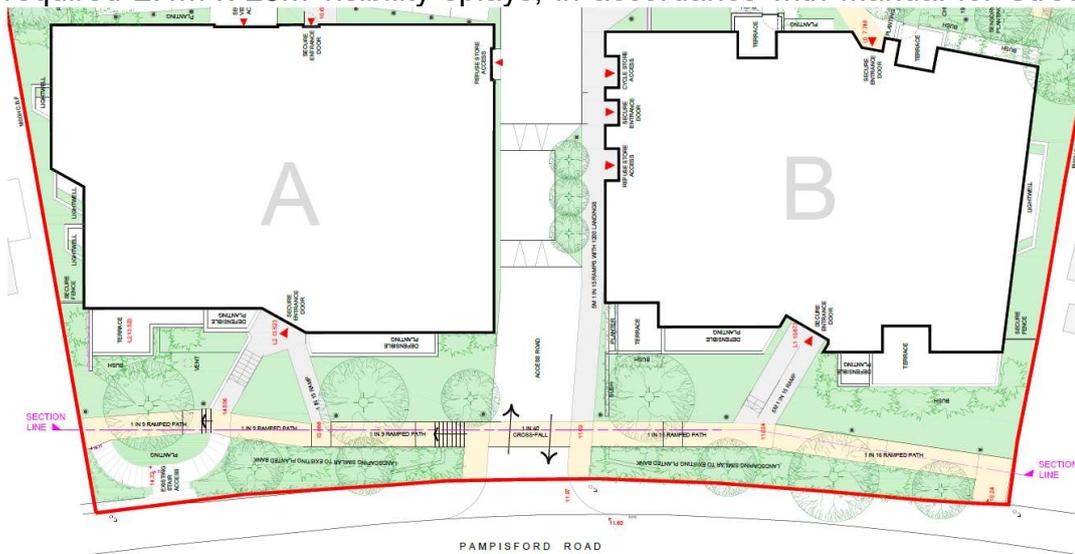


Fig.23: Proposed vehicular and pedestrian accesses from Pampisford Road.

- 8.86. The proposal would also include pedestrian access directly from Pampisford Road at four locations along the site frontage which would be at different levels. Some of these pedestrian access points would have 1:15m gradient ramps with 1.2 metres landing every 5 metres, as per The Building Regulations – Access to and use of buildings approved document (2015 edition incorporating 2016 amendments), for wheelchair users.
- 8.87. As stated above, the proposed layout would minimise the interaction between the pedestrian and vehicular movements on site. Additionally, the development would include on-site servicing and manoeuvring area to ensure all vehicles leave the site in forward gear.
- 8.88. The proposal would provide Dry Risers within the flatted element of the development, with access for emergency vehicles such as Fire Appliances being possible from Pampisford Road.
- 8.89. Considering all the above, and as per the advice sought from the Council's specialist officer and engineers, the proposal would not harm the adjoining public highway or the safety of its users. The decision notice would include a condition for a construction logistics plan to ensure minimum disruption to the highway during the construction process.
- 8.90. Traffic Generation and Sustainable Travel: The application included a trip generation assessment which showed that the proposed residential parked vehicles on site would have the potential to generate 18 - 24 two-way vehicle movements in the AM and PM peak respectively. This level of additional traffic would be considered to unlikely result in a detrimental impact on the local network, particularly when taking out existing 4-8 trips from the existing properties reducing the overall uplift to 10-20 trips overall.
- 8.91. 2011 Census method of Travel to Work data for Purley was used to calculate the daily residential use trip generation. This study showed that residents would travel by public transport, walking or cycling, a total of approximately 59% of all trips. This data along with the site's proximity to public transport services and town centre amenities would translate to future residents depending on

sustainable modes of transport. Accordingly, the development would be subject to financial contributions to sustainable transport which would include improvement works for the junction towards the gyratory, funding towards sustainable travel and contribution to installation of EVCP in the borough.

- 8.92. Vehicle Parking: Policy DM30 of the CLP (2018) states sustainable growth in Croydon would require new development to reduce the impact of car parking in any development located in areas of good public transport accessibility or areas of existing on-street parking stress and provide car and cycle parking spaces as set out in Table 10.1. It also states that development should provide parking for affordable homes at an average rate not less than 2/3 that of other tenures.
- 8.93. Table 10.1 states that major developments should aim for parking ratios as per London Plan Table 6.2 with no provision for higher levels of car parking in areas with low Public Transport Accessibility Levels. The site falls within PTAL 1b, though this PTAL does not reflect the actual connectivity of the site due to its proximity to Purley Station, Purley town centre and nearby education and leisure facilities. Pampisford Road itself has a single yellow line parking restriction in place within the vicinity of the site, prohibiting parking between 7am and 7pm. It also has intermittent parking bays, the nearest being located approximately 70m to the south.
- 8.94. The proposal would have Block B as affordable housing, this block would comprise 22 units and according to Policy DM30 would need 15 vehicle parking spaces with the rest of the units requiring an average of 1 space/unit (less than 1 space/ 1-2 bedrooms and up to 1.5 space/3-bedrooms). The total parking requirement for the development would be 59 spaces including the remaining 44 units. The proposal would have 52 vehicle parking spaces, with an overspill of seven vehicles onto the area.
- 8.95. The application included a parking stress survey which concluded that the area has 24 vacant car parking spaces out of a capacity of 106 spaces, or parking stress of 77%, available between 11pm and 5am on a weekday within 200 metres taking into account overspill from already committed developments. This is the most critical time of the day for residential parking assessment.
- 8.96. Considering the above, the seven vehicles overspill would not cause adverse impact on parking in the area.
- 8.97. In addition to the above, the development would be subject to a s106 agreement restricting future occupiers from on-street parking permit, the provision of a car club bay and car club membership for all units. Paragraph 6.46 of The London Plan Policy 6.13 states that: *'The Mayor, through TFL, and working with the London boroughs... will support expansion of car clubs and encourage their use of ultra-low carbon vehicles...Each car club vehicle typically results in eight privately owned vehicles being sold, and members reducing their annual car mileage by more than 25 per cent.'*
- 8.98. Considering the above, the car club bay which would be secured under s106 would offset eight private vehicles, eradicating any overspill from the development.
- 8.99. Table 10.1 of the CLP (2018) states that major developments should enable the future provision of electric charging points and parking bays for electric vehicles. The proposal would have electric charging points for 10 spaces (20%)

and the decision notice would include a condition to ensure passive electric charging points ready for future installation across the remainder of spaces as per the ITP Draft London Plan.

- 8.100. Considering all above, and as per the advice sought from the Council's Strategic Transport officer, the proposed vehicle parking levels, its layout and access would be acceptable.
- 8.101. Cycle Parking: Table 6.3 of The London Plan (2016) sets the cycle parking standards at one space per one-bedroom units and two spaces for all other bigger units; it also required major developments to have one space per 40 units for short stay. The proposed mix would require a total of 119 spaces and two short stay spaces. The proposal would have a total of 123 spaces total; under each of the four blocks with various rack arrangements; all of which would have levelled access and in proximity to the building entrances. The decision notice would include a condition to ensure that parking would be laid out as approved prior to occupation and that visitors' cycle parking would be installed as per policy.
- 8.102. Considering all above, and as per the advice sought from the Council's Strategic Transport officer, the proposed cycle parking levels, its layout and access would be acceptable.
- 8.103. Waste Management: Policy DM13 of the CLP (2018) aims to ensure that the location and design of refuse and recycling facilities are treated as an integral element of the overall design and the Council would require developments to provide safe, conveniently located and easily accessible facilities for occupants, operatives and their vehicles.
- 8.104. The proposal would comprise a refuse store under each of the four blocks within 30-metres carry distance for future occupiers. All the refuse stores would sit within the 20-metres wheelie-bin drag-distance for collection. The waste strategy would include the collection vehicle to enter and manoeuvre inside the site and leave in forward gear. The details for the refuse stores sizes and location and the collection strategy were agreed with the Council's Waste and Recycling team.
- 8.105. In summary, the proposal's parking provision, vehicular movement and servicing of the proposed development would not result in a significant adverse impact on adjoining highway and its operation in terms of safety, significant increment to existing on-street parking as per the London Plan (2016) and Croydon Local Plan (2018) Policies DM13 and DM30.

IMPACTS ON TREES AND ECOLOGY

- 8.106. Trees: Policy DM10.8 of the CLP (2018) states that: *'In exceptional circumstances where the loss of mature trees is outweighed by the benefits of a development, those trees lost shall be replaced with new semi-mature trees of a commensurate species, scale and form.'* Policy DM28 of the CLP (2019) states that the Council will seek to protect and enhance the borough's trees and hedgerows, adding that a condition require replacement of removed trees will be imposed and those replacement trees should meet the requirement of DM10.8.

- 8.107. The site comprises four extensive gardens with several trees, none of the existing trees are under Tree Protection Order (TPO). Policy DM28 recognises that trees are only one consideration when addressing the competing needs of development and agrees that replacement semi-mature trees of commensurate species, scale and form can mitigate the loss of existing trees.
- 8.108. The application included a BS5837:2012 compliant Arboricultural Assessment Report which considered the effect of the proposed development on the local character, from a tree point of view. This report identified the trees that would be removed as a total of 26 trees have been proposed for removal within the site, the majority of which are small to medium sized ornamentals of lower (category C) amenity value. 4 trees to be removed have been categorized as category B, trees of moderate quality, although the four trees are spread throughout the site and of limited wider visual amenity value.
- 8.109. The scheme would propose the planting of 48 new trees which would range between extra heavy and specimen mature trees (heights range from 5 to 6+ metres). In addition to three types of hedge planting around most of the site with a height of 1.2 -1.5 metres. As per the image below.



Fig.24: The proposed landscape showing existing and proposed trees and hedge.

- 8.110. Accordingly, the development would propose trees replacing those removed as a result of the proposal, the number of proposed trees would exceed the

number of removed trees and its stature would accord with the requirement of policy DM10 and would be acceptable.

- 8.111. Ecology: Policy DM27 of the CLP (2018) states that developments should have no adverse impact on land with biodiversity or geo-diversity value as designated on the Policies Map and have no adverse impact on species of animal or plant or their habitat protected under British or European law, or when the Council is presented with evidence that a protected species would be affected.
- 8.112. The site is not subject to any statutory or non-statutory designations. The application incorporated a Preliminary Ecological Assessment which concluded that the site contains linear features in the form of boundary vegetation and mature borders which provide commuting routes and steppingstone habitats for mobile species such as bats and birds. Linear boundary vegetation will facilitate the movement of smaller terrestrial animal such as rodents and common reptiles, particularly slow worm. The bat survey carried did not record bats either exiting or entering the dwellings.
- 8.113. The Council's ecological consultant reviewed the submitted report and confirmed it had sufficient ecological information for determination, did not raise any concerns but requested the addition of a condition to ensure compliance with the recommendations of the submitted ecology report and another condition for a biodiversity enhancement strategy prior to slab level. The decision notice would include these conditions as advised.
- 8.114. In summary, the proposal would include replacement to the removed trees on site and would incorporate mitigation measures to reduce or avoid the impact on protected habitats on site as per Local Plan Policies DM10.8, DM27 and DM28.

SUSTAINABILITY AND FLOODING

- 8.115. Sustainability and Energy Efficiency: Policy SP6.2 of the CLP (2018) states that the Council will ensure that development make the fullest contribution to minimising carbon dioxide emissions in accordance with the London Plan energy hierarchy to assist in meeting local, London Plan and national CO2 reduction targets.
- 8.116. The Council Sustainable Development & Energy Officer reviewed the submitted Energy Statement and agreed with its conclusions. The development would:
- Meet the 35% onsite reduction via fabric insulation, gas boilers and solar PV; and
 - Commit to a carbon offset payment of £60/tonne; calculated as: offset of 36.1 (tonne/year) x 30 (years) x £60/tonne = £64,980.00;
- 8.117. This carbon offset would be included within the s106, along with the Council's standard payment triggers of 50% on commencement, 50% on completion. The decision notice would also include a Condition to submit the 'as built' carbon performance (Dwelling Emission Rate), as calculated as part of the Building Regulations compliance. Along with submission of evidence of installation of the solar PV system (e.g. MCS Certificate or equivalent).

- 8.118. Policy SP6.3 of the CLP (2018) requires all new-build residential development to meet water efficiency standard of 110 litres/person/day as set out in Building Regulations Part G. The decision notice would include a condition to ensure the development would adhere to the standards of this policy.
- 8.119. Flooding and Sustainable Urban Drainage: The site falls outside areas with risk of flooding and surface water flooding as per the information provided on the Environmental Agency Flood Map and confirmed in the submitted Flood Risk Assessment (FRA), it also falls within a low ground water flooding zone. Policy DM25 of the CLP (2018) states that sustainable drainage systems (SuDS) are required in all development. This would ensure that sustainable management of surface water would not increase the peak of surface water run-off when compared to the baseline scenario.
- 8.120. The application included amendments to the submitted FRA; the final FRA was approved by the Council's Lead Local Flooding Authority with the condition that the application would engage with the Environmental Agency and confirmed that the strategy for managing runoff from the various parts of the site as follows:
- Roofs and hardstanding to infiltration SuDS (cellular storage units with permeable geotextile),
 - Permeable paving with infiltration in car park areas,
 - Green roof may be used in Blocks C and D, and
 - Infiltration rates were confirmed by site investigation.
- 8.121. The Environmental Agency was consulted on the scheme, however referred the council to the standard advice due to the location of the site outside areas with risk of flooding. The decision notice would include a condition for the application to engage with the EA as per the LLFA request.

ARCHAEOLOGY

- 8.122. Policy DM18.9 of the Croydon Local Plan (2018) states that in consultation with the Greater London Archaeological Advisory Service, or equivalent authority, the Council will require the necessary level of investigation and recording for development proposals that affect, or have the potential to affect Croydon's archaeological heritage. Remains of archaeological importance, whether scheduled or not, should be protected in situ or, if this is not possible, excavated and removed as directed by the Greater London Archaeological Advisory Service or equivalent authority.
- 8.123. Paragraph 199 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. Applicants should also improve knowledge of assets and make this public.
- 8.124. The application site lies in a Tier 1 Archaeological Priority Area as defined by the borough policy so denotes the high potential for archaeological to occur within the area. Specifically within this area of the Tier 1 is the potential for further Saxon burials to be encountered or related archaeology. Previous archaeological recommendation had been for pre-determination archaeological investigation of the site by trial trench evaluation. It transpires that the dwellings

within the application site are in occupation and private ownership who do not wish for their properties to be the subject of pre-determination site work. An option to reserve site layout to permit possible reconfiguration to enable preservation in situ will not work with this site given the degree of proposed development.

- 8.125. Accordingly, Historic England recommended, due to the site constraints, that the proposed scope of archaeological investigation and possible mitigation is to be secured by pre-commencement condition. NPPF section 16 and the London Plan (2011 Policy 7.8) make the conservation of archaeological interest a material planning consideration. NPPF paragraph 189 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest.
- 8.126. The Greater London Historic Environment Record concludes that the development could cause harm to archaeological remains and field evaluation would be required to determine appropriate mitigation. However, although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints could allow for a two-stage archaeological condition as an acceptable safeguard. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation. The decision notice would include this condition as recommended.

ENVIRONMENTAL HEALTH

- 8.127. Policy DM23 of the Croydon Local Plan (2018) states that the Council will promote high standards of development and construction throughout the borough by: a. Ensuring that future development, that may be liable to cause or be affected by pollution through air, noise, dust, or vibration, will not be detrimental to the health, safety and amenity of users of the site or surrounding land; and b. Ensuring that developments are air quality neutral and do not lead to further deterioration of existing poor air quality;
- 8.128. Air Pollution: The Council's EH requested an environmental management plan and a construction logistics plan prior to the commencement of the development. The application include and Air Quality Assessment report which was found satisfactory, the decision notice would include a condition to ensure the recommendations of the report would be adhered to. Additionally, the s106 agreement would include air quality financial contribution of £100/unit.
- 8.129. Noise Pollution: The Council's EH requested a condition for a Delivery and Service Plan to ensure that servicing activities would be conducted in a safe and efficient manner as per TFL guidelines. They also requested a number of informatives to be added to the decision notice in relation to air handling units/plant/machinery and light pollution, in addition to an information regarding the requirement for ultra-low NOx boiler.
- 8.130. Contaminated Land: The Council's EH requested a phase 1 study report to be submitted before commencement. The decision notice would include the condition as requested.

9. CONCLUSIONS

- 9.1. The provision of 66 residential dwellings within the Borough is encouraged by the Council's Local Plan policies, national guidance in the NPPF and regional policies of the London Plan.
- 9.2. The proposal would provide 33% affordable housing all at London Affordable Rent tenure as per agreement with a registered provider.
- 9.3. The proposed site layout and design of the new building has had sufficient regard to the scale and massing, pattern and form of development in the area and to existing building, and would result in an appropriate scale of built form on this site.
- 9.4. The proposed development would result in the creation of modern residential units ensuring good standard of accommodation for future occupiers. The development has been designed to ensure that the amenity of existing local residents would not be compromised.
- 9.5. In addition, the development would be acceptable on highways, environmental and sustainability grounds as well as in respect of the proposed planning obligations.
- 9.6. All material considerations have been taken into account, including responses to the consultation. The conditions recommended and obligations secured by Section 106 would ensure that any impacts of the scheme are mitigated against and it is not considered that there is any material planning considerations in this case that would warrant a refusal of this application. Taking into account the consistency of the scheme with the Development Plan and weighing this against all other material planning considerations, the proposal is considered to be acceptable in planning policy terms.