

1.0 APPLICATION DETAILS

Ref: 20/04128/FUL
 Location: 22 Hartley Down Purley CR8 4EA
 Ward: Purley and Woodcote
 Description: Demolition of the existing dwelling and erection of a three storey building containing 7 flats.
 Drawing Nos: 778/01 Rev A, PL-050 V1, PL-051 V1, PL-099 V1 , PL-100 V1, PL-101 V1, PL-102 V1, PL-105 V1, PL-201 PL-2011, PL-206 PL-206, PL-201 V1, PL-205, PL-206, PL-300 V1, PL-301 PL-301 V1, PL-302 PL-302 V1, PL-303 V1, PL-305 V1, PL-400 V1, PPP-PL01 V1, PPP-PL01 V1, PL-001, PL-005, PL-010, PL-031, Construction Logistics Plan, Lift Viability Study, Tree Survey (BS5837:2012 (Trees in Relation to Design, Demolition and Construction) , Transport Statement, PL-501, Design and Access Statement (Parts 1&2 September 2020).
 Agent: Mr Spencer Copping
 Applicant: Purple Pepper Partnership
 Case Officer: Jedd Goodwin-Roberts

	1b1p	1b2p	2b3p	2b4p	3b4p	3b5p	TOTAL
Existing	0	0	0	0	0	1	1
Proposed (all market housing)	0	2	2	0	2	1	7

Number of car parking spaces	Number of cycle parking spaces
4	12

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

- Objections above the threshold in the Committee Consideration Criteria
- Referral from Hartley and District Residents Association

2.0 RECOMMENDATION

2.1 That the Planning Committee resolve to GRANT planning permission subject to the completion of a legal agreement to secure the following:

- A financial contribution of £10,500 for sustainable transport improvements and enhancements.

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. Commencement time limit of 3 years
2. Development to be carried out in accordance with the approved drawings and reports

Pre-commencement conditions

3. Submission and approval of SUDS details

Pre-above ground works conditions

4. Submission and approval of cycle store details, bin store details and details of the path leading to the refuse store.
5. Submission and approval of hard and soft landscaping (to include the planting of diverse species); boundary treatments; child play space; communal amenity space; and a maintenance and management plan.
6. Submission and approval of details of EVCP's.
7. Submission and approval of the materials specification.
8. Submission and approval of external facing materials junctions
9. Submission and approval of details of balcony privacy screens.

Pre-occupation conditions

10. Provision of visibility splays in accordance with drawing PL-051 Rev 1.
11. Submission and approval of a Delivery and Servicing Management Plan

Compliance conditions

12. Obscure glazing on side facing windows (not the oriel view) of windows on the flank elevations with no openings lower than 1.7m above floor level.
13. Development to be carried out in accordance with the Tree Protection Plan and the Arboricultural Impact Assessment.
14. Development to achieve energy efficiency and water efficiency requirements.
15. Compliance with the submitted Construction Management Plan and Construction Logistics Plan version 1.0 dated 15.06.2019
16. Development in accordance with accessible homes requirements
17. 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. Highways informative in relation to s278 and s38 works required
5. Compliance with Building/Fire Regulations

6. Construction Logistics Informative (in relation to condition 3)
7. Refuse and cycle storage Informative (in relation to condition 10)
8. Any other informative(s) considered necessary by the Director of Planning and Strategic Transport

3.0 PROPOSAL AND LOCATION DETAILS

Proposal

- 3.1 The application seeks planning permission for the demolition of an existing two storey dwelling, with accommodation in the roof space and the erection of a two storey detached building, with accommodation in the roof space. The proposed building is a contemporary reinterpretation of buildings found in the locality. The proposed building is a two storey building with a third storey contained within the roof space. The proposed building would have a staggered front elevation with a prominent front facing gable, all of which are common features found in the locality.
- 3.2 The proposed building would have 7 residential units including 2X1 bed, 2X2 bed and 3X3 bed units. The building includes accommodation within the roof space and within the lower ground floor.
- 3.3 To the front of the proposed building would be 4 vehicular parking spaces and 12 cycle parking spaces would be accommodated within an internal cycle store
- 3.4 An external bin store is provided to serve the development comprising of space for 2 1100 euro bins and 1X140l food waste container accessed via a ramp/lift.
- 3.5 Communal amenity space would be provided which includes: 465 SQM amenity space including a communal allotment area with seating measuring 130 SQM and a dedicated child play space measuring 30 SQM.



Site and Surroundings

- 3.6 The application site is broadly rectangular in shape with land levels sloping down from Hartley Down towards the rear of the site. The site is located on the western side of Hartley Down. To the rear of the site is a railway line. The application site comprises of an inter-war style detached dwelling finished in white render. It has a tile hipped pitched roof and has a double storey set back side extension, single storey rear extension and a series of single storey side extensions and additions. The building is constructed to its northern flank boundary and is set in circa 0.95m from its southern flank boundary
- 3.7 The nearby buildings on Hartley Down comprises detached dwellings that are generally 2-3 stories in height (inclusive of roof accommodation in some instances). Hartley Down is a residential street in the Purley and Woodcote Ward to the south-west of Purley town centre. It is characterised by traditional detached houses. The buildings on the street are varied in design although there are shared design characteristics, including tiled, pitched roofs with hipped ends, properties with decorative front facing gabled elements, brick and render elevations and small dormers to front, side and rear elevations.
- 3.8 The application site is in an area at risk of surface water flooding and is within a critical drainage area. The application site is not constrained by being adjacent to any heritage assets and there are no protected trees on the site, however within the application site there are a number of trees of varying quality. There are some large trees towards the rear of the site.
- 3.9 The application site has a PTAL rating of 2. Hartley Down is not located within a CPZ and is located 1 mile away from Purley District Centre and the Train Station. There are several bus stops located on Old Lodge Lane (0.3km) with services towards Croydon, Coulsdon, South Croydon, Selsdon, Sanderstead and Purley. Reedham Railway Station is set 0.4km away and provides rail services towards London (London Bridge) and towards Tattenham Corner.



Aerial view of site

Planning History

3.10 Site history is set out below.

Reference	Description	Decision	Date
19/04150/FUL	Demolition of existing dwelling and erection of building to provide 9 residential units (1 x 1 beds, 5 x 2 beds and 3 x 3 beds), with associated landscaped areas including children's play space, parking, cycle and refuse storage. <ul style="list-style-type: none"> • Appeal Dismissed 	Refused	15.11.2019
Reasons for refusal: 1	The proposal, by reason of its design, massing, siting and overall proportions would result in an incongruous form of development. The proposal would therefore fail to integrate successfully within the immediate surroundings and would be detrimental to the streetscene, contrary to Policies 7.4 and 7.6 of the London Plan (consolidated with alterations since 2011) and Policies SP4 and DM10 of		

	the Croydon Local Plan 2018 and the Suburban Design Guide SPD 2019.	
Reason for refusal 2	The development would be detrimental to the amenities of the occupiers of the neighbouring properties by reason of its mass, design and siting resulting in loss of light, outlook, visual intrusion, and privacy, and would thereby conflict with Policies DM10 of the Croydon Local Plan 2018, Suburban Design Guide SPD 2019, and 6.12 and 6.13 of the London Plan (consolidated with alterations since 2011).	
Reason for refusal 3	The development would result in sub-standard accommodation by reason of lack of habitable accommodation, inadequate floorspace, poor layout, design, outlook, privacy and light levels, thereby conflicting with DM10 of the Croydon Local Plan, Policy 3.5 of The London Plan , The Nationally Described Space Standards 2015 and the London Plan House Supplementary Planning Guidance 2016.	
Reason for refusal 4	Insufficient information has been provided in relation to drainage which fails to demonstrate that the development would utilise sustainable urban drainage systems. The application would thereby conflict with Policies SP6.4 and DM25 of the Croydon Local Plan 2018.	
Reason for refusal 5	The development would not provide adequate and accessible cycle and refuse storage. The application would thereby conflict with policies DM10.2 and DM13.1 of the Croydon Local Plan 2018.	
Reason for refusal 6	The applicant has failed to demonstrate that the development would not increase parking pressures in the local area and harm highway safety. The application would thereby	

	conflict with policy DM30 of the Croydon Local Plan 2018 and Policy 6.13 of the 2016 London Plan.	
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3.11 Five pre-apps were submitted before the current application. The 2020 applications were submitted by the current agent as per this proposal. Applications from 2019-2018 were submitted by a different agent

Reference	Description
20/02719/PRE	Demolition of existing dwelling and erection of a three storey building containing 7 flats
20/00959/PRE	Demolition of existing dwelling and erection of a three storey building comprising 9 flats
19/00771/PRE	Proposed demolition of a single family dwelling and erection of a two storey block containing 3x 3BED, 4x 2BED and 2x 1BED apartments with associated access, 4 parking spaces, 20 space cycle storage and refuse store.
19/00189/PRE	Demolition of a single-family dwelling and erection of a 2-storey block, containing 3 x 3 bedroom, 3 x 2 bedroom, and 3 x 1 bedroom apartments with associated access, 5 parking spaces, 12 space cycle storage and integrated refuse store.
18/05745/PRE	Demolition of a single family dwelling and erection of (i) a two storey block containing 1 X 3BED, 4 X 2 BED and 2 X 1BED apartments as well as (ii) a separate dwelling at the rear of the property comprising 1 X 3BED apartment, with associated access, 7 parking spaces, 12 space cycle storage and refuse store.

4.0 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.
- The proposal includes a mix of different sized units that meets the strategic target for family accommodation and provides quality accommodation and amenity space for residents.
- The design and appearance of the development is of a high quality, is in keeping with design characteristics found locally and would not harm the character of the surrounding area.
- The proposed landscaping scheme will result in an enhancement to the street scene.
- The living conditions of adjoining occupiers would be protected from undue harm.

- The level of parking and impact upon highway safety and efficiency would be acceptable.
- No arboricultural objections subject to conditions.

5.0 CONSULTATIONS

Network Rail

5.1 No response received

6.0 LOCAL REPRESENTATION

6.1 The application was publicised by 8 letters of notification to neighbouring properties.

6.2 The number of representations received from in response to the initial notification and publicity of the application are as follows. It should be noted that there are instances of multiple / duplicate entries submitted by the same objectors and these have been counted individually.

6.3 No of individual responses: 22; Objecting: 22; Supporting: 0

6.4 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.

Objection	Officer comment
<i>Character and design</i>	
Overdevelopment, too large/dense/deep for the site	Addressed in paragraphs 8.5-8.16 of this report
Bulk and mass will cause harm to the street scene	
Homes in the area are detached/semi-detached. No blocks of flats	
Design is out of character with surrounding properties due to its contemporary style	
Roof line is out of character with the 1930s/post-war properties in the vicinity	
The number and shape of windows in the front elevation make the building appear wider	

Proposed materials bear no relation to other buildings in the vicinity	
Dominance of car parking and bins at the front	
<i>Impacts on neighbouring amenity</i>	
Overlooking towards adjoining neighbours due to side windows	Addressed in paragraphs 8.25-8.32 of this report
Increased height dominates neighbouring properties	
Building lines are deeper than neighbouring properties	
Loss of light to neighbouring properties	
Noise from new residents using the outside space will be detrimental to local residents and wildlife	It is not considered that noise from the proposed residential use would be out of the ordinary in comparison to other residential uses in the area.
Noise from construction.	A construction logistics and management plan condition would be imposed. Construction works cannot take place out of permitted hours.
<i>Transport and highways impacts</i>	
Inadequate car parking provision. On street parking on Hartley Down would cause traffic congestion	Addressed in paragraphs 8.42-8.50 of this report
Traffic will cause congestion, noise and pollution and damage to the roads	
The parking study takes a snapshot during a weeknight only and should be undertaken during the weekend	The Lambeth methodology requires surveys to be undertaken in the night when the highest numbers of residents and cars are likely to be home. It does not specify which nights during the week it needs to be undertaken.
Where will delivery and service vans, ambulances and taxis stop	There is sufficient space on the front forecourt for delivery and servicing. Upon approval a condition requiring a delivery and servicing plan shall be imposed.

Inadequate provision for bins. Bins would be left on the pavement	The proposal includes a bin store within the site to store bins The bin store is located in an accessible location to enable refuse operatives to replace the bins after collection.
Quality of accommodation	
Lack of private amenity and play space	Addressed in paragraphs 8.17-8.24 of this report
Demolition of family housing and proposed flats not suitable	Addressed in paragraphs 8.2-8.4 of this report
Flooding	
Flood risk, moving the soil on the site would result into water run-off to properties lower down the hill	A condition would be attached for submission of the final details of the proposed SUDS measures.
Paved parking area does not have provision for drainage so will increase flood risk	Permeable paving would be used on the parking forecourt and this can be secured by condition.
Ecology Concerns	
<i>Paving over gardens would result in a loss of ecological environments and the removal of trees would be harmful</i>	Discussed in paragraph 8.54below
Other matters	
Burden on local amenities including sewage, gas, electricity, water. Lack of provision of local infrastructure	The development will make a CIL payment to contribute towards infrastructure and services
Flats not appropriate in this area of single family dwellings	Flats would contribute to providing a mix of different types of housing to facilitate mixed and balanced communities.
Croydon is overpopulated	Croydon's housing needs are set out in both policies and specialist reports which make clear the amount of additional homes required

6.5 The Hartley and District Residents Association have objected to the application, raising the following (summarised) concerns:

- Issues with the details of the Construction Logistics Plan. (Officer comment-Details of a construction logistics plan will be condition as part of this application despite some details already provided).
- Issues with the lift viability study. Concerns that this 4 storey building has no lift yet 66% of flats in the HADRA area have been constructed with a lift.

(Officer comment-this will be discussed in the subsequent sections on Unit M4 Regulations).

- Concerns with the quality of accommodation proposed including bathrooms with no windows. Issues around the quality of the proposed child play space. Lack of meaningful amenity space
- Impact on the character of the surrounding area

6.6 Councillor Oni Oviri has objected to the proposal on the following grounds:

- Out of character with the surrounding properties which are two storey houses
- The size and massing is too great for the plot and loss of garden land
- Harm to the amenity of neighbours due to overlooking and visual intrusion
- Noise caused by the development would be detrimental to adjoining neighbours

7.0 RELEVANT PLANNING POLICIES AND GUIDANCE

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

7.2 Government Guidance is contained in the National Planning Policy Framework (NPPF) (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.

7.3 The main planning Policies relevant in the assessment of this 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
- D12 Fire Safety
- 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
- S11 Improving air quality
- S12 Minimising greenhouse gas emissions

- SI3 Energy 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

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

Supplementary Planning Documents/Guidance

- Croydon Suburban Design Guide SPD (2019)
- Section 106 Planning Obligations in Croydon and their Relationship to the Community Infrastructure Levy (2019)
- London Housing SPG (Mayor of London, 2016)
- Accessible London: Achieving an Inclusive Environment SPG (Mayor of London, 2014)
- Play and Informal Recreation SPG (Mayor of London, 2012)
- Character and Context SPG (Mayor of London, 2014)
- Sustainable Design and Construction SPG (Mayor of London, 2014)

8.0 MATERIAL PLANNING CONSIDERATIONS

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

- Principle of development
- Design of the proposal and the impact on the character of the area
- Quality of accommodation
- Impact on neighbouring residential amenity
- Impacts on trees
- Landscaping
- Impacts on ecology and biodiversity
- Access, parking and highways impacts
- Waste / Recycling Facilities
- Sustainability and Flood Risk

Principle of Development

8.2 The site's existing use is residential and as such the proposed redevelopment of the site for residential purposes is acceptable in principle, subject to a detailed consideration of the specifics of the proposal. Policy SP2.1 of the Croydon Local Plan (2018) 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. London Plan policy D3 encourages incremental densification to achieve a change in densities in the most appropriate way and policy H3 seeks to significantly increase the contribution of small sites to meeting London's housing needs. Given the above, the principle of intensifying the residential use of the existing site to provide a greater quantum of homes than existing is acceptable.

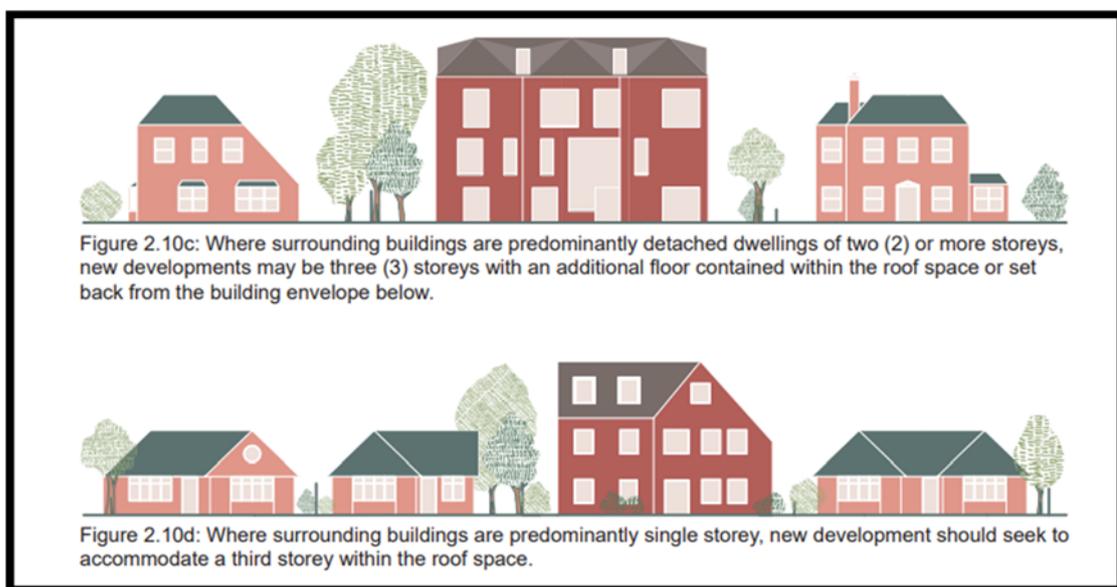
8.3 Policy DM1.2 seeks to prevent the net loss of small family homes by restricting the loss of three bedroom units and the loss of units that have a floor area of less than 130sqm. The existing property has three bedrooms and exceeds 130 SQM. The proposal includes 3X3 bedroom dwellings and as such there would be no net loss of family sized accommodation.

8.4 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 in order to meet the borough's need for family sized units and ensure that a choice of homes is available in the borough. The proposal achieves 42% 3 bedroom accommodation and as such meets the strategic target and contributes to family housing provision for the borough.

8.5 The current proposal at 22 Hartley Down is for 7 units and would not trigger a requirement for affordable housing contributions.

Design and impact on the character of the area

- 8.6 The existing building is a two storey extended 1930s style detached dwelling finished in white pebbledash render. The dwelling itself does not hold any significant architectural merit and there is no 'in principle' objection to its demolition.
- 8.7 Policies SP4.1 and DM10.1 of the Local Plan state that the Council will require development of a high quality, which respects and enhances Croydon's varied local character and contributes positively to public realm, landscape and townscape to create sustainable communities. Proposals should seek to achieve a minimum height of 3 storeys, should respect the development pattern, layout and siting; the scale, height, massing, and density; and the appearance, existing materials and built and natural features of the surrounding area.
- 8.8 The scheme has evolved through two rounds of pre-application discussion (the pre-apps were with different architects but the same applicant).
- 8.9 In terms of massing, the proposed building when viewed from Hartley Down would appear as a two storey building with accommodation in the roof space. Its appearance would be largely similar to that of a detached dwelling, with a forward facing decorative gabled element and a setback front elevation. The Suburban Design Guide (SPD) states that where the surrounding buildings are predominantly detached two storey dwellings, developments may be up to three stories with an additional storey within the roof space. The SPD states that where surrounding buildings are predominantly single storey, new development should seek to accommodate a third storey within the roof space.



- 8.10 In terms of the height and massing, the proposed building height does not entirely accord with the guidance set out in the Suburban Design Guide SPD when read from the front elevation (Hartley Down). The guidance encourages three stories plus accommodation in the roof in settings when neighbouring properties are two storey detached dwellings and the proposal is for two storeys plus accommodation in the roof space. However the proposed scale and mass is considered appropriate, given that plot widths along this stretch of Hartley Down

are narrower and buildings sit closer together. The proposal would therefore not result in an incongruous and over dominant form of development within the street scene. When viewed from its rear elevation, the building would appear as a three storey building with accommodation contained within its roof space. This would accord with the aforementioned guidance.



Proposed massing / street elevation

- 8.11 The proposed foot print of the building is larger than the neighbouring properties. The proposed building would extend some 7m deeper than the rear elevation of the existing building. The proposed building would be some 6.5m deeper than No.20 to the north and 6.7m deeper than number 24 to the south of the site. Details have been submitted to demonstrate that a 45 degree line is not encroached by the development, when drawn from the centre of the closest rear ground floor habitable room windows of the immediately neighbouring properties. This applies in both plan view and elevation and is in accordance with the guidelines set out in the Suburban Design Guide SPD.



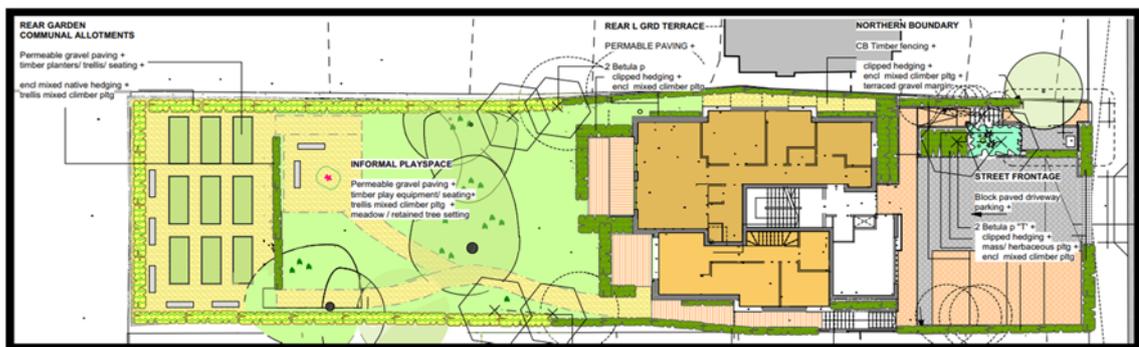
Rear elevation showing 45 degree sightlines.

- 8.12 The proposed width of the building is slightly narrower than the existing building on site with a maximum width of 13.2m into the flank winged elements. The site retains a gap of 1.2m between the building and the flank boundaries. Properties

along Hartley Down are relatively large properties with properties either being constructed up to the boundaries or are dwellings with narrow gaps between the built form and the boundaries. In this instance, the proposed building would retain an adequate gap around the building and would generally respect the established pattern of development when paying regards to gaps around the buildings and as such would be considered appropriate within the street scene.

- 8.13 The front building line is staggered, with the projecting element with the gable stepping forward. However the gable element of the proposed building would align with the established building lines of No.24 and No.20 and would not encroach beyond it. The proposal utilises the sloping land levels so that the ground floor level of the building sits lower than the pavement level. There are no proposed changes to land levels at the rear. This is considered to have an acceptable impact on the character and appearance of the surrounding area. . The proposed building would sit slightly higher than the adjacent neighbours. Figure 2.10e of the Suburban design guide 2019 states where adjacent buildings are two storey in height, new developments should seek to accommodate a full third storey contained within a roof space. The proposed development would accord with this criteria of the guidance and is considered an appropriate height in the context of the streetscene.
- 8.14 The proposed design approach is a contemporary reinterpretation of the post-war properties found in the area. The character appraisal included within the Design and Access Statement identifies various features within the surrounding styles of suburban housing and draws upon these in the proposed design. For example, the low roof eaves, roof hips and gables of the proposed building are a key feature of the existing property on the site and characteristic of the style of buildings found in Hartley Down. The form and shape of the building and the entrance canopy are an interpretation of the geometric forms found locally.
- 8.15 The proposed materiality responds well to materials found in the vicinity. White brick is proposed as a reference to the use of white render, a contrasting brick for the base of the gabled element including a blue/grey brick with a perforated design feature responds to the more recent renovation projects in Hartley Down and the brown tile clad element on the gabled feature of the building and the roof responds to the earthier tones found in this suburban environment. The proposed balcony balustrades are powder coated metal railings with narrow spindles. Details of the proposed materials have been submitted and are acceptable, but full details will be required by condition. The proposed window reveals and projections add depth to the facades, which is supported. The proposed design is considered to be a high quality contemporary reinterpretation approach which responds well to the character of the area. Minor design amendments have been made as part of the assessment of the application, predominantly to streamline and simplify the side flank elements to ensure they sit well within the fabric of the overall building. Conditions shall be imposed with regards to the materials and external facing material junctions will be imposed upon approval.
- 8.16 In terms of site layout, the proposal includes 4 parking spaces on the front forecourt which is softened by boundary planting around the forecourt and in front of the building. The existing vehicular crossover is retained. The main entrance to the building is well defined from the street by a deep recess to the ground floor

plinth with the upper floors projecting above. The refuse store is located externally on the front forecourt, clad in materials to match the main building. Cycle storage for residents is internal to the building. There is internal access through the building to the extensive shared amenity space and children's play space at the rear (via a lift and stairs to the lower ground floor) and is also accessible via external steps to the southern side of the building). The play space is incorporated into amenity area. To the rear of the garden is an area to allow residents to have their own allotment patch.



Proposed site plan

8.17 Overall, whilst it is acknowledged that the proposed building is larger than the existing on the site and the neighbouring properties, the height is compliant with policy and the approach to the massing the proposal is considered to sit well within the street scene. The design approach is high quality. The proposal is considered to comply with policies SP4.1 and DM10.

Quality of Accommodation

8.18 London Plan 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. All proposed units exceed the minimum space standards and internal layouts have been well thought with adequate storage space. All proposed units are dual or triple aspect and will receive good levels of light and outlook as a result of the large windows. Some of the bedrooms are served by flank oriel windows. However these rooms are provided with either front or rear views and have a side viewing panel which provides an adequate level of outlook to serve these primarily sleeping habitable spaces. London Plan Policy D12 requires proposals to demonstrate adequate fire safety protection measures as part of all new residential developments. During the course of the application, the applicant had submitted a fire strategy statement. The details outlined in the statement are in conformity with what the requirements of London Plan D12 require.

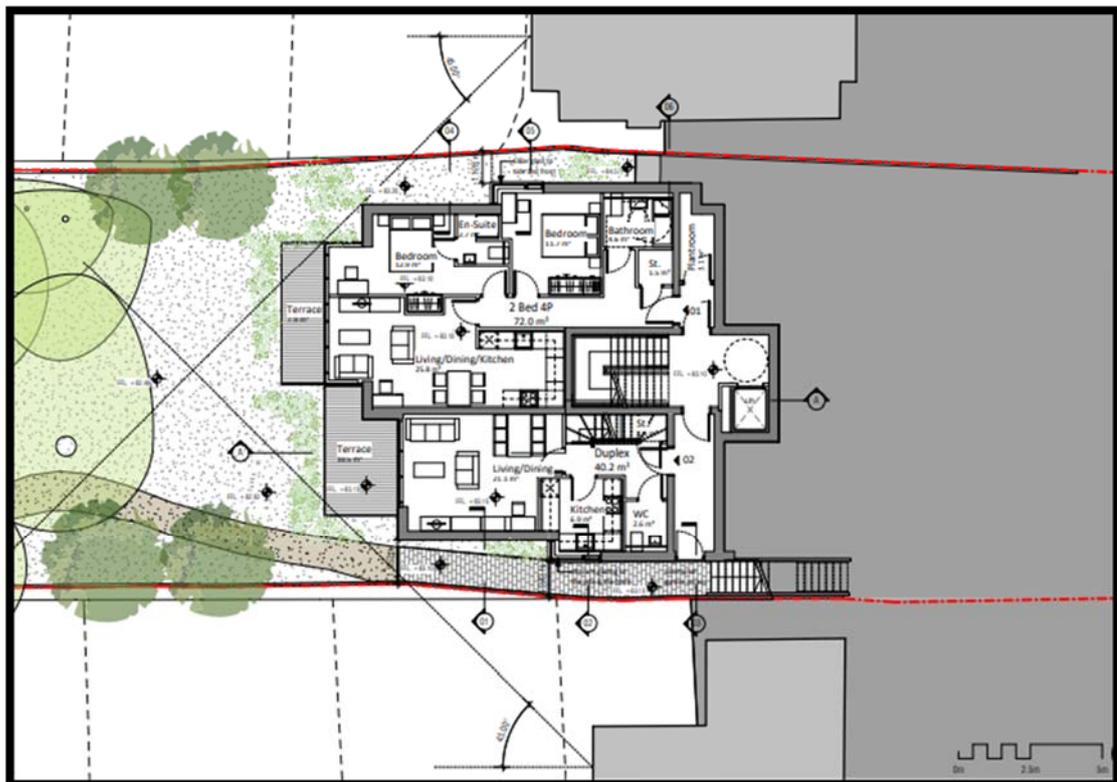
8.19 London Plan policy D7 states that 10% of new build housing should meet Building Regulation requirement M4(3) 'Wheelchair User Dwellings' and that the remaining 90% should meet Building Regulation requirement M4(2) 'Accessible and Adaptable Dwellings' which requires step free access to all units and the facilities of the site.

- 8.20 One wheelchair user dwelling is proposed as part of the proposal, (unit 3 on the ground floor). However, this unit is unable to fully comply with the requirements of M4(3) due to the steep slope of the land levels at the front of the site. The proposed site is on a steeply sloping site and a balance has been met between providing a visually acceptable scheme and a scheme that adequately sensitively intensifies residential development on the site. If the scheme had been amended to create flatter land levels at the front of the site, this would have resulted in an increase in the ground floor height of the proposed building, thereby increasing the height of the overall development which would have been unacceptable in this location. To aid access to the building, a stair lift is proposed alongside the front access path to allow disabled access. It should be noted that the building includes a wheelchair lift which links the ground floor with the lower ground floor to allow step free access to the rear communal amenity space. This also means that the 3 units on the ground and lower ground floor are able to be M4(2) compliant. In this instance is considered acceptable given the low number of flats proposed in this block.
- 8.21 The flats on the first and second floor of the proposed development are not serviced by a lift. London Plan Policy D5 requires developments to have inclusive design and Policy D7 sets out the Part M requirements. Within Policy D7 there is flexibility for not having step free access to all dwelling entrances in exceptional circumstances in blocks of 4 storeys or less. In this case, a wheelchair lift has been provided for 2 of the 4 floors of development and justification has been provided for not having full provision on the basis that the provision of a lift to all floors would not be viable due to increased service costs, increased development costs and would have a detrimental impact on the configuration of upper floor units due to the limited footprint of the building. This is a small site, (less than 0.25 hectares in size), and bringing forward sites such as this is a strategic priority as set out in Policy H2 of the London Plan. Therefore, on balance the accessibility arrangements for this site are considered to be acceptable.
- 8.22 Policy DM10.4 of the Local Plan requires provision of high quality private amenity space at a minimum of 5sqm per 1-2 person unit and an extra 1sqm per extra occupant thereafter. All of the units are provided with either decking patio gardens (with regards to the ground and lower ground floor units), and private balconies for all other dwellings. In this instance, the proposed development would provide private amenity space that would exceed the minimum policy requirements.
- 8.23 Policy DM10.4 also requires provision of children's play space calculated using the Mayor of London's population yield calculator. Play space is incorporated in the centre / rear of the garden as part of the landscape strategy. The requirement according to table 6.2 of policy DM10.4 would be for 51sqm based on the no of bed spaces provided in each dwelling and this is exceeded.
- 8.24 Communal amenity space of approximately 470sqm is also provided (including the space at the very rear of the garden which is occupied by large trees). This space comprises formal and informal areas including lawn, planting, seating and play.

- 8.25 The applicant has provided details in relation to fire safety, specifically in relation to fire appliance positioning, evacuation assembly point, safety features and access. This matter will be finalised through the Building Regulations regime.
- 8.26 In summary, the proposal would provide good quality accommodation for future occupiers internally and externally in accordance with Local Plan Policies SP2 and DM10 and the London Plan policies D6 and D7.

Impacts on Neighbouring Residential Amenity

- 8.27 Policy DM10.6 of the Local Plan 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.
- 8.28 The neighbouring properties on the opposite side of the road at No.15a and No9 are not considered to be affected by the development proposals. These properties whilst opposite do not directly view into the development site. The proposed building would have forward views towards the gap between these two properties. As such, there would be no overlooking towards these neighbours that would result in harm to neighbouring amenity and the situation would largely remain the same. There are no neighbours to the rear of the site which would be adversely affected.



Plan showing 45 degree lines taken from neighbouring properties.

8.29 Impact on No.24 Hartley Down (south)

8.30 Local Plan Policy DM10.6 states that the council will support development that ensures that the amenity of adjacent occupiers are protected and that proposals do not result in overlooking at close range of habitable rooms

8.31 Adjacent to the site to the south is detached neighbour No.24. This neighbour has two flank windows. Owing to the placement of the flank elevation window on this neighbouring property and its close proximity to the front elevation window, it is likely that this window would act as a secondary window serving this room, given its location on the dwelling. The proposed building would not be too dissimilar in the eaves height of the roof and the overall roof ridge height hips further away than the existing ridge height than the existing building. Currently the outlook of these windows in question would be towards the application dwelling and its hipped roof. Given the proposed building is located in a similar position and would have similar height proportions at this location, it is considered that the proposal would have no adverse harm on neighbouring residential amenity in this regard.

8.32 The proposed building has been designed to not intercept a 45 degree line taken from the nearest habitable windows to the front and rear of this property. Therefore the proposal is considered to have an acceptable impact with regards to outlook and levels of natural and daylight received by these windows.

8.33 The proposed development includes flank windows that would face towards this property. However these windows are Oriel in design and are proposed to have obscure glazing facing towards this neighbour at heights above ground floor level. As such there would be no overlooking towards this neighbour. At ground floor level the proposal includes a rear facing projecting balcony above a single storey rear addition. This proposes glazed privacy screens to ensure no overlooking towards neighbouring. This detail is proposed to be controlled by the imposition of a planning condition.

8.34 Local Plan DM10.6 (c) states that proposals 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. The proposal by reason of the placement of the building and the windows would not result in a loss of privacy of the first 10m of the rear garden. It is acknowledged that the proposal may afford views towards the rear ends of this neighbours garden from either the rear windows or the proposed rear facing balconies, however this area of the garden is not protected by policy and this level of outlook/views towards the rear ends of gardens is expected within such urban locations and exists in the existing situation. It should be noted that all inset balconies would predominantly have a rear facing outlook. The projecting balcony at ground floor would have obscure glazed flank screening (as detailed in the paragraph above) and as such, this would help to further protect neighbouring amenity.

8.35 Impact on No.20 Hartley Down (North)

8.36 This neighbour has no flank windows facing towards the application property. The proposal includes flank windows facing towards this neighbouring property.

However these are oriel windows with the facing elements proposed to be obscure glazed, thus there would be no harm on neighbouring amenity should this property ever wish to implement its permitted development rights by inserting flank windows.

- 8.37 The proposed building has been designed to not intercept a 45 degree line taken from the nearest habitable windows to the front and rear of this property. Therefore the proposal is considered to have an acceptable impact with regards to outlook and levels of natural and daylight received by these windows.
- 8.38 The proposal by reason of the placement of the building and the windows would not result in a loss of privacy of the first 10m of the rear garden. It is acknowledged that the proposal may afford views towards the rear ends of this neighbour's garden from either the rear windows or the proposed rear facing balconies, however this area of the garden is not protected by policy and this level of outlook/views towards the rear ends of gardens is expected within such urban locations and exists in the existing situation. It should be noted that all inset balconies would predominantly have a rear facing outlook. The projecting balcony at ground floor would have obscure glazed flank screening (as detailed above), and as such, this would help to further protect neighbouring amenity.
- 8.39 Overall, any potential amenity impacts on neighbouring occupiers are considered to have been adequately mitigated by designing the building to not intercept 45 degree sight lines and also the construction of the building utilising the sloping topography of the site are considered to be acceptable in line with policy DM10.6.

Trees

- 8.40 Policy DM10.8 and DM28 seek to retain existing trees and vegetation. Submitted with the planning application was an Arboricultural report. This includes a summary of the trees to be removed, an Arboricultural Impact Assessment and an Arboricultural Method Statement. The report provides a full classification of trees on the site. It identifies which trees are scheduled for removal and which are to be retained. The application site contains two category B trees. These are scheduled to be retained. The site has 11 C category trees and three category U trees. All of the category C trees are proposed to be retained but 2 of the category U trees are proposed to be removed. The proposed trees for removal are identified as being of a low quality and do not contribute to the visual amenities of the wider area. No objections have been raised by the Council's tree officers with regards to the removal of the trees and they have no tree objections as a whole subject to the imposition of relevant conditions. The impact of the proposed development on trees is acceptable, subject to conditions.

Landscaping

- 8.41 Local Plan policy DM10.8 requires proposals to incorporate hard and soft landscaping. A good quality landscaping scheme is proposed. At the front, permeable block paving is proposed and planting including a mix of clipped hedging and mixed climbers are proposed in addition to a retained tree. This is considered to be acceptable.

8.42 At the rear are two gravel permeable paths and areas of paving. There is an area designated for informal play space and seating. Within the rear is a small communal allotment garden with seating and privacy screening and timber planters. The proposal includes planting of 4 trees and retention of 1 tree. The proposal includes an extensive area of lawn and would be enclosed by 1.8m close board wooden fencing and a mix of clopped hedging and mixed native hedging. Details of planting and species are provided within the Landscaping Plan and are acceptable. The proposed landscaping (subject to the imposition of conditions) is acceptable.

Access, Parking and Highway Safety

8.43 The site has a Public Transport Accessibility Level (PTAL) of 2 which indicates poor access to public transport. Hartley Down is a 20 mph road. The site is not within a CPZ and there are no on-street parking restrictions. The application site is 0.3 km away from bus stops on Lodge Lane which provide bus routes into the near by towns. The site is 0.4 km away from Reedham railway station which provides rail services towards London Bridge and Tattenham Corner.

Access arrangements

8.44 The proposal seeks to retain the existing access arrangements with regards to the proposed entrance into the site. The proposal includes a separate pedestrian path into the site. The proposed path includes a 1:12 transition area at the back of the footway before the main ramp starts leading down to a forecourt area with a 1:7 level. This is considered to be acceptable. Given the topography of the site and the parking area, a balanced judgement has been made to accept that this proposal would not comply with M4 (3) building regulations. The parking area is considered to be appropriate for other residents using the building.

8.45 The submitted swept path analysis shows that cars can enter and leave the site in a forward gear. The Council normally requires 1:1 parking on sites such as this. As such, in order to justify the shortfall of 3 car parking spaces a parking survey in line with the Lambeth Methodology was undertaken. The Lambeth Methodology states that for residential developments, the survey should be taken when the highest number of residents are at home which is generally late in the evening during the week. Snapshot surveys should be taken on two separate weekday nights. The survey assessed on-street parking availability within 200m walking distance of the site on two typical weekday overnight periods as well as daytime and early evening periods. The stress survey was conducted during the 2020 Covid Pandemic and during a lock down period. This generally would have meant that most people should have been at home during this period, with most cars parked either on the street or on private driveways. It was found that there was a 31% parking stress during the test period, which was conducted during a national lockdown when most cars and people would be at their home addresses. The parking stress falls well within the guidance of 80% parking stress for the development to be acceptable. As such, it is considered that the streets nearby can accommodate overspill parking that may be generated by the development.

8.46 A contribution of £10,500 will be secured via the S106 agreement to contribute towards sustainable transport initiatives including on street car clubs with electric

vehicle charging points (ECVPs) 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 at around £2500, signing, lining of car club bay, EVCP provision including electrics and set up costs for the car club. It should be noted that a car club would not be directly provided on site, however funding would go towards local car club provision. 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.

- 8.47 The car parking arrangements comply with Local Plan policy DM30 and London Plan policy T6.

Cycle parking

- 8.48 Policy DM30 and London Plan policy T5 and Table 10.2 would require provision of a total of 11 cycle parking spaces for residents. A total of 12 cycle spaces are proposed. This is proposed within a designated cycle store within the building. The proposed spaces by numbers exceed the standards required by the London Plan for this development. The proposal must provide a cycle store in accordance with the London Plan Cycle Design Standards and the Cambridge Residential Design guide held as best practise. The location and the access to the cycle store is considered acceptable. However as a local planning authority Croydon do not support the use of Wall hung cycle stores. Sheffield stands should be used with 5% of Sheffield stand provision to facilitate wider and adapted bikes. Details of this can be secured by condition upon approval.

Waste / Recycling Facilities

- 8.49 Policy DM13 requires the design of refuse and recycling facilities to be treated as an integral element of the overall design. The bin store is proposed on the front forecourt, in a brick container to match the main building with lockable doors. The bin store is well located within the site due to the sloping land levels and is in a place that enables easy refuse collection access. The bin store is well screened from the footway by a wall and hedgerow so is considered to have been appropriately integrated into the development in line with policy DM13 and is acceptable.
- 8.50 The proposed refuse store is considered to be in an acceptable location in regards to refuse collection. However the footpath and the boundary wall opening to this area would need to be 2m in width to enable refuse to be collected by operatives. Details of this can be secured via condition upon approval.
- 8.51 A bulky waste storage area of 10sqm is provided at the front of the site in line with policy DM13

Flood Risk and Energy Efficiency

Flood risk

8.52 The application site is situated in a site of low flood risk and located in flood zone 1. However, it is located in a critical surface water drainage area. The site benefits from a large area of soft landscaping and permeable paving to the front. However, to ensure that surface water drainage is adequately dealt with it is considered appropriate to add a condition requiring details of surface water drainage to be submitted for approval.

Energy efficiency

8.53 In order to ensure that the proposed development will be constructed to high standards of sustainable design in accordance with Local Plan policy SP6, a condition will be attached requiring the proposed development to both achieve the national technical standard for energy efficiency in new homes (2015) which requires a minimum of 19% CO2 reduction beyond the Building Regulations Part L (2013), and meet a minimum water efficiency standard of 110 litres/person/day as set out in Building Regulations Part G.

Ecology and Biodiversity

8.54 Local Plan Policy DM27 seeks to protect and enhance the biodiversity within Croydon. Amongst other things, the policy seeks to ensure developments incorporate biodiversity to enhance local flora and fauna and aid pollination locally and incorporate productive landscapes. Whilst some comments received on the application have raised ecology concerns, the application site is not within a designated/protected location. The proposal includes an extensive soft landscaping area to the front and rear of the site. The proposal includes planting, however a suitably worded condition can be added to ensure a diverse mix of planting is proposed. The proposal includes an allotment area to the rear of the site which would enable future residents to do their own planting, thus contributing to a rich and diverse ecological environment and as such would contribute to local plan Policy DM27.

Conclusion

8.55 The provision of 7 flats in this location is acceptable in principle. The proposed design, massing, site layout and quality of accommodation is acceptable, with good quality landscaping, shared amenity and play space proposed. Mature trees would be retained and protected. Amenity impacts on neighbouring properties have been successfully mitigated. 4 car parking spaces are proposed and it has been demonstrated that there is sufficient space in the surrounding roads (non-bus route parts) to accommodate overspill car parking, and the location near to bus stops and a short distance from Reedham railway may encourage people to use sustainable modes of transport. The proposal is also acceptable on ecology, flooding and sustainability grounds.

8.56 All material considerations have been taken into account, including responses to the public consultation. Taking into account the consistency of the scheme with the Development Plan and weighing this against all other material planning considerations, the proposal is considered to be acceptable in planning policy terms.

Other matters

8.57 The development would be liable for a charge under the Community Infrastructure Levy (CIL).

8.58 All other planning considerations including equalities have been taken into account.