

**PART 6: Planning Applications for Decision**

**Item 6.1**

**1 APPLICATION DETAILS**

Ref: 23/00155/FUL  
 Location: 198 Harrington Road, South Norwood, SE25 4NE  
 Ward: Woodside  
 Description: Demolition of end of terrace dwelling and existing structures on site. Erection of seven dwellings with associated external works including access, parking, amenity space, landscaping, refuse and cycle storage.  
 Drawing Nos: 21-1413-51A; 21-1413-52A; 21-1413-53A; 21-1413-54; 21-1413-55; 21-1413-56B; 21209-MA-XX-XX-DR-C-0100 P04; 21209-MA-XX-XX-DR-C-7040 P04; 21209-MA-XX-XX-DR-C-7060 P04 and the red edged site location plan scaled at 1:1250.  
 Applicant: Inicio Homes  
 Agent: Tim Cropper (Mialex)  
 Case Officer: Wayne Spencer

<b>Housing Mix</b>					
	<b>1 bed</b> (2 person)	<b>2 bed</b> (3 person)	<b>2 bed</b> (4 person)	<b>3 bed</b> (6 person)	<b>TOTAL</b>
<b>Existing</b>				1	1
<b>Proposed</b> (market housing)				7	7
<b>TOTAL</b>				7	7

<b>Vehicle and Cycle Parking (London Plan Standards)</b>	
<b>PTAL: 2</b>	
<b>Car Parking maximum standard</b>	<b>Proposed</b>
7	7
<b>Long Stay Cycle Storage minimum</b>	<b>Proposed</b>
14	14
<b>Short Stay Cycle Storage minimum</b>	<b>Proposed</b>
2	2

This application is being reported to committee for the following reason:

The Ward Councillor (Cllr Mike Bonello) made representations in accordance with the Committee Consideration Criteria and requested committee consideration. Furthermore, objections above the threshold in the Committee Consideration Criteria have been received.

**2 RECOMMENDATION**

2.1 That the Committee resolve to GRANT planning permission

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

### **Conditions**

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

#### Pre-commencement conditions

- 3) Construction Logistics Plan to include a survey of the public highway
- 4) Landscaping and hard standing specifications
- 5) Footway / Carriageway Condition Survey
- 6) Tree Protection
- 7) SUDS

#### Pre-Occupation Conditions

- 8) External materials/samples and 1:5 detailed elevations
- 9) Implementation of car parking as specified
- 10) Electric Vehicle Charging Points at 20% active and 80% passive
- 11) Submission of a lighting scheme
- 12) Submission of a biodiversity enhancement plan
- 13) Submission of a Refuse Management Plan
- 14) Obscure glazing to the north facing upper floor windows

#### Compliance Conditions

- 15) Accessibility (M4(2) and M4(3))
- 16) Refuse and cycle stores to be provided as shown on the drawings
- 17) In accordance with the Fire Statement
- 18) Water efficiency requirements
- 19) Any other planning condition(s) considered necessary by the Director of Planning and Strategic Transport

### **Informatives**

- 1) Granted subject to a Section 106 Agreement
- 2) Community Infrastructure Levy
- 3) Code of practice for Construction Sites
- 4) Construction Logistics Informative

5) Any other informative(s) considered necessary by the Director of Planning and Sustainable Regeneration

2.5 That the Committee confirms that adequate provision has been made, by the imposition of conditions, for the preservation or planting of trees as required by Section 197 of the Town and Country Planning Act 1990.

2.6 That, if by 01 September 2023 the legal agreement has not been completed, the Director of Planning and Sustainable Regeneration is delegated authority to refuse planning permission.

### 3 PROPOSAL AND LOCATION DETAILS

#### Proposal

3.1 The applicant seeks full planning permission for the demolition of an existing end of terrace dwelling house and the erection of a row of 5 mews style terraced properties and a pair of semi-detached dwellings comprising of a total of 7 x 3-bed, six person dwellings with associated rear garden amenity spaces, hard and soft landscaping and boundary treatments. It also involves alterations to the existing vehicular crossover to provide a wider access with visibility splays (which would allow 2 vehicles to pass), three tandem parking spaces and a row of 4 parallel parking spaces and cycle and refuse provision associated with the development.



Image 1: Proposed Site Layout

#### Amendments

3.2 Amended plans were received on the 02 May 2023 which sought to clarify the parking and access layout, including swept paths diagrams for ingress, egress and turning on site, as well as clarification over the cycle and refuse layout within the site. Third parties were not re-consulted regarding these amendments given that they were points of clarification, did not make significant alterations to the original submission and would not result in any additional impact on adjoining occupiers.

### Site and Surroundings

3.3 The application site is located on the southern side of Harrington Road and is 'L' shaped, which means it includes a large area of land to the rear of no.198 Harrington Road. The site has a single width private driveway that runs to the east of the main dwelling and provides access to a rectangular back-land site that extends beyond the rear gardens of nos.200–206 Harrington Road. This back-land area measures approximately 800sqm to the south of the main dwelling. The site is currently occupied by a single storey end of terrace dwelling with two, what appear to be unauthorised buildings, to the rear of the main dwelling which are currently vacant. Further to the south of the site is a public footpath with the tram line and South Norwood Country Park positioned beyond this. There is a self-seeded wooded area to the east of the site. The site is not within a statutory protected area, the existing dwelling is not nationally or locally listed and there are no statutory or locally listed buildings in close proximity.

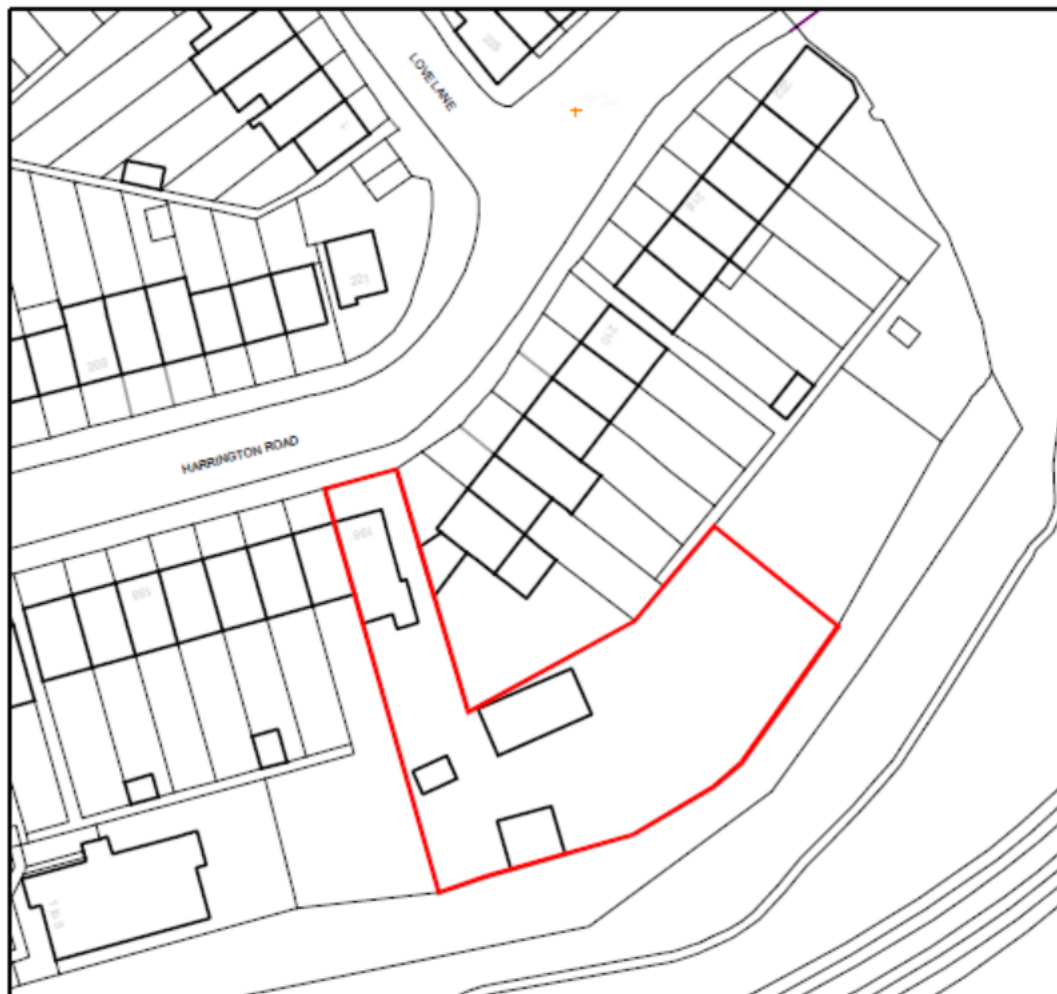


Image 2: Site Location Plan

## Planning Designations and Constraints

- 3.4 The site is subject to the following formal planning constraints and designations:
- PTAL: 2
  - At 'medium' risk of surface water flood risk (being 1 in 30, 1 in 100, 1 in 1000 year) and an at area at risk of critical drainage

## Planning History

- 3.5 The following planning decisions are relevant to the application:

22/03596/FUL – Demolition of existing end of terrace dwelling and other buildings. Erection of 9 x 3-bed dwellings with associated access, parking, amenity space, landscaping, refuse and cycle storage – Permission refused on the following grounds:

1. *The proposed site layout and massing of the footprint would dominate the site and the development as a whole would result in an out of keeping and incongruous development which would be detrimental to the prevailing character and appearance of the built form in the surrounding area, contrary to Policies D3 and D4 of the London Plan 2021 and Policy DM10 of the Croydon Local Plan 2018.*
2. *The proposed development would provide poor quality residential units by virtue of a lack of natural light to the dwellings and the rear garden spaces given the proximity of the trees to the south. The proposed development is considered to be contrary to the Policy D3, D6 and D7 of the London Plan 2021, Policies SP2.8, SP4.1 and DM10 of the Croydon Local Plan 2018 and the Mayor's Housing SPG.*
3. *The proposal by reason of its siting, layout, massing and design would result in an overbearing and overpowering development resulting in visual intrusion to the occupants of the surrounding properties to the detriment of their residential amenity, contrary to Policy D3 of the London Plan 2021 and Policy DM10 of the Croydon Local Plan 2018.*
4. *No part of the proposal would conform to Part M(4)3 of the Building Regulations and therefore the development would conflict with Policy D7 of the London Plan 2021.*
5. *In the absence of a legal agreement, the application does not offer a contribution to improvements to sustainable transport to alleviate traffic generation created by the development. The proposal would thereby be contrary to Policy T6.1 of the London Plan (2021) and policies SP8.3, SP8.15, SP8.16, and DM30 of the Croydon Local Plan (2018).*
6. *The proposal, by reason of its siting, design and layout, would result in insufficient parking provision, insufficient vehicular and pedestrian access to delivery and servicing to the detriment of highway safety. In addition, there is insufficient sustainable transport measures incorporated into the proposal and the proposed cycle storage would fail to conform to the required standards, contrary to Policies T4 and T5 of the London Plan 2021 and Policies DM29 and DM30 of the Croydon Local Plan 2018.*
7. *The proposal would provide insufficient refuse and recycling storage facilities and no 10sqm bulky goods area would be provided, contrary to Policy DM13 of the Croydon Local Plan 2018.*
8. *It has not been demonstrated that the development would meet the required fire safety standards, contrary to Policy D12 of the London Plan 2021.*

22/00526/PRE – Proposed demolition of the existing dwelling and redevelopment of the site to provide 9 new homes with associated vehicle and cycle parking, refuse and amenity space – Advice given

05/02339/P – Erection of single storey side/rear extension to the main dwelling (no.198 Harrington Road) – Permission granted

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

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

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

#### **5 CONSULTATION RESPONSE**

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

#### **6 LOCAL REPRESENTATION**

6.1 A total of nine neighbouring properties were notified about the application and invited to comment. In addition, a number of site notices were displayed close to the site providing consultation to the wider area. The number of representations received from neighbours, local groups etc in response to notification and publicity of the application were as follows:

No of individual responses: 72 Objecting: 69 Supporting: 2 Comments: 1

6.2 The Councillor Mike Bonello has objected to the proposal on the grounds that the development would be out of keeping with the area and is strongly opposed by local residents.

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

Objection	Officer comment
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<ul style="list-style-type: none"> <li>· Flats out of keeping with the surrounding area</li> </ul>	<p><i>OFFICER COMMENT: This application is for 3-bed family dwellings as opposed to flats</i></p>
<ul style="list-style-type: none"> <li>· Loss of a well-kept, family home which is unjustified</li> <li>· Loss of an existing dwelling would result in the loss of a coherent and uniformed rhythm of terraced properties (each end terrace house has stained glass book-end which would be lost)</li> <li>· Loss of end terrace property may disturb the structural integrity and concern over treatment of flank wall serving no.196 Harrington Road</li> <li>· Cramped/overdevelopment of the site</li> <li>· Out of keeping design which is harmful to the character of the area/street scene</li> <li>· Isolated backland development</li> <li>· Not subservient in height to Harrington Road</li> <li>· Inappropriate in size and scale – unacceptable density of development</li> <li>· Lack of green space, soft landscaping and unacceptable layout dominated by built form</li> </ul>	<p><i>Covered within paragraphs 8.2 to 8.12</i></p>
<ul style="list-style-type: none"> <li>· Proposed dwellings would not provide high quality living conditions (small out of keeping gardens, windows overshadowed by trees to the south, noise from adjacent tram lines)</li> </ul>	<p><i>Covered within paragraphs 8.13 to 8.16</i></p>
<ul style="list-style-type: none"> <li>· Impact upon childminding business at no.200 Harrington Road</li> </ul>	<p><i>OFFICER COMMENT: There are no planning records for the property to be used for this purpose</i></p>
<ul style="list-style-type: none"> <li>· Excessive height and scale would be overbearing and visually intrusive to neighbouring properties</li> <li>· Loss of light and overshadowing to neighbouring properties</li> <li>· Overlooking/loss of privacy to neighbouring properties</li> <li>· Noise, disturbance and light pollution to neighbouring properties</li> <li>· Dust and air pollution impact from construction works, increased density and vehicle movements</li> <li>· Too close to neighbouring properties with separation distances incorrect</li> <li>· Security/crime/anti-social behaviour risk (including bins located against garden walls allow access to potential criminals)</li> <li>· Impact on health and wellbeing</li> </ul>	<p><i>Covered within paragraphs 8.19 to 8.25</i></p>
<ul style="list-style-type: none"> <li>· Loss of/harm to trees and biodiversity/wildlife impact/impact on climate change</li> <li>· Impact upon the South Norwood Country Park</li> </ul>	<p><i>Covered within paragraphs 8.32 to 8.34</i></p>
<ul style="list-style-type: none"> <li>· Insufficient parking provision to serve the development</li> <li>· Insufficient space within the site for deliveries, servicing and emergency services</li> <li>· Increased parking stress/trip generation</li> </ul>	<p><i>Covered within paragraphs 8.26 to 8.29</i></p>

<ul style="list-style-type: none"> <li>· Highway and pedestrian safety concerns due to the site location on a blind bend with numerous previous accidents</li> <li>· Inadequate turning space to allow entry and exit in a forward gear</li> </ul>	
<ul style="list-style-type: none"> <li>· Construction logistics has not been fully considered</li> </ul>	<i>Covered within paragraph 8.23</i>
<ul style="list-style-type: none"> <li>· Insufficient waste storage and inappropriate location within the site which would impact upon residents</li> </ul>	<i>Covered within paragraphs 8.30 to 8.31</i>
<ul style="list-style-type: none"> <li>· Collection by private waste collectors not sustainable</li> </ul>	<i>OFFICER COMMENT: The refuse will be managed/moved to the collection point by private contractors but will be collected by Council operatives</i>
<ul style="list-style-type: none"> <li>· Impact upon schools, GPs, shops, public transport and other local services</li> </ul>	<i>Covered within paragraph 8.24</i>
<ul style="list-style-type: none"> <li>· Increased flood risk to an area already at high risk</li> </ul>	<i>Covered within paragraph 8.35</i>
<ul style="list-style-type: none"> <li>· No mechanism to secure social housing from this scheme</li> </ul>	<i>OFFICER COMMENT: Not a requirement for a scheme of less than 10 units</i>
<ul style="list-style-type: none"> <li>· No Fire Safety Statement submitted</li> </ul>	<i>OFFICER COMMENT: This has now been provided by the applicant. It was not considered that the submission of this document would warrant re-consultation with neighbours as it did not make material changes to the proposal. Its acceptability will be assessed as part of this report</i>
<ul style="list-style-type: none"> <li>· Loss of property value and compensation should be offered</li> </ul>	<i>OFFICER COMMENT: Not a material planning consideration</i>
<ul style="list-style-type: none"> <li>· Loss of a view and the impact upon wellbeing</li> </ul>	<i>OFFICER COMMENT: Not a material planning consideration</i>
<ul style="list-style-type: none"> <li>· Built for profit with no consideration for local people</li> </ul>	<i>OFFICER COMMENT: Not a material planning consideration</i>
<ul style="list-style-type: none"> <li>· No need of this development given the number of vacant properties in the locality</li> </ul>	<i>OFFICER COMMENT: Not a material planning consideration. There is an identified need in Croydon for family homes which are required by Local Plan Policy SP2</i>
<ul style="list-style-type: none"> <li>· Lack of consultation with the local community</li> </ul>	<i>OFFICER COMMENT: The required consultation process was carried out by the Council by way of letters to those who adjoin the</i>



	<p><i>application site and site notices were displayed on Harrington Road. Therefore, the appropriate level of consultation has been carried out in accordance with the Council's constitution and statutory requirements</i></p>
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## **7 RELEVANT PLANNING POLICIES AND GUIDANCE**

### **Development Plan**

7.1 The Council's adopted Development Plan consists of the London Plan 2021, the Croydon Local Plan 2018 and the South London Waste Plan 2022. Although not an exhaustive list, the policies which are most relevant to the application are:

#### London Plan (2021)

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

#### Croydon Local Plan (2018)

- SP2 Homes
- DM1 Housing choice for sustainable communities
- SP4 Urban Design and Local Character
- DM10 Design and character
- DM13 Refuse and recycling
- SP6 Environment and Climate Change
- DM23 Development and construction
- DM25 Sustainable drainage systems and reducing floor risk
- DM27 Protecting and Enhancing our Biodiversity
- DM28 Trees
- SP8 Transport and communications
- DM29 Promoting sustainable travel and reducing congestion
- DM30 Car and cycle parking in new development
- DM47 South Norwood and Woodside

7.2 The Development Plan should be read as a whole, and where policies conflict with each other, the conflict must be resolved in favour of the policy contained in the last document to be adopted, approved or published as part of the development plan, (in accordance with S38(5) of the Planning and Compulsory Purchase Act 2004).

## **Planning Guidance**

### National Planning Policy Framework (NPPF)

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

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

### SPDs and SPGs

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

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

## **8 MATERIAL PLANNING CONSIDERATIONS**

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

1. Principle of development
2. Design and impact on character of the area

3. Quality of residential accommodation
4. Impact on neighbouring residential amenity
5. Trees, landscaping and biodiversity
6. Access, parking and highway impacts
7. Flood risk and energy efficiency
8. Other Planning Issues
9. Conclusions

### **Principle of development**

- 8.2 The Croydon Local Plan (CLP) 2018 sets out a housing target of 32,890 homes over a 20-year period from 2016-2036 (1,645 homes per year). The London Plan requires 20,790 of those homes to be delivered within a shorter 10-year period (2019-2029), resulting in a higher target of 2,079 homes per year. The CLP 2018 also sets out a target for development on Windfall sites of 10,060 homes (approximately 503 per year). The London Plan requires 6,410 net completions on small sites (below 0.25 hectares in size) over 10 years, with a small-sites housing target of 641 per year.
- 8.3 The London Plan (LP) 2021 and the National Planning Policy Framework (NPPF) 2021 place significant weight on housing delivery and focus on the roles that intensification and small sites in particular can play in resolving the current housing crisis. Policy SP2.1 of the CLP 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.
- 8.4 LP 2021 Policy D3 encourages incremental densification to achieve a change in densities in the most appropriate way. Policy H2 seeks to significantly increase the contribution of small sites to meeting London's housing needs and also sets out that development density should be proportionate to a site's connectivity and accessibility including both PTAL and access to local services. Supporting Paragraph 4.2.4 outlines that existing residential areas within PTALs 3-6 or within 800m distance of a station or town centre boundary is expected to play an important role in contributing towards the housing targets for small sites. Higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling (Criterion B of Policy D3). The site has a PTAL 2 rating, however it is approximately 130 metres from Harrington Road Tram Stop, approximately 12-minute walk from Norwood Junction Railway Station and approximately 900m from the South Norwood District Centre. Whilst the site has a lower PTAL of 2 and is more than 800m from the nearest retail centre, it is in close proximity to 2 different public transport options. In addition, whilst sites with higher PTAL's and in closer proximity to retail centres play an important role in contributing to housing targets, the policy does not exclude sites that are outside such areas. As such, on balance, the site is considered to be in a suitable location for the proposed residential development.
- 8.5 CLP Policy DM1.2 seeks to prevent the net loss of small family homes by restricting the loss of three-bedroom units and the loss of units that have a floor area of less than 130sqm. CLP Policies SP2.7 and DM1.1 set a strategic target for 30% of all new homes over the plan period to have 3 or more bedrooms to meet the borough's need for family sized units and ensure that a choice of homes is available in the borough. The

proposed development would result in the demolition of a 3-bed home with a GIA of approximately 135sqm. The existing dwelling to be demolished is not afforded any statutory protection and all of the 7 units proposed would have 3-bedrooms. As such, the proposal would result in a net increase of 6 family homes within the site. Given the significant weight that has to be attached to housing delivery as set out in the framework, it is considered that residential development on the site in question would be acceptable in principle subject to all other material considerations being acceptable when weighed in the planning balance.

### **Design and impact on character of the area**

- 8.6 Section 12 of the NPPF (2021) attaches great weight to the importance of design in the built environment, with Paragraph 130 stating that development should be visually attractive as a result of good architecture, layout and appropriate and effective landscaping; and 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). London Plan Policy D3 requires new development to optimise site capacity through a design-led approach. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site. Development should enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions. Policy SP4.1 and SP4.2 of the Croydon Local Plan 2018 states that the Council will require development to be of a high quality and be informed by the distinctive qualities, identity, topography and opportunities of the relevant places of Croydon. Policy DM10.1 states that proposals should achieve a minimum height of 3 storeys whilst respecting a) the development pattern, layout and siting; b) The scale, height, massing and density; c) The appearance, existing materials and built and natural features of the surrounding area. CLP Policy DM10.7 requires developments to incorporate high quality materials that respond to the local character in terms of other things durability, attractiveness, sustainability, texture and colour. This policy also requires roof forms to positively contribute to the character of the local and wider area with proposals being sympathetic with its local context.
- 8.7 The application site fronts onto Harrington Road on land which is fairly flat. The immediate area is residential in character and generally contains terraced properties within fairly narrow, linear plots. However, the site in question has a linear plot with a large parcel of land attached to the rear which is currently occupied by two, single storey, detached buildings which are understood to be unauthorised and were previously in use for residential and storage purposes. This application seeks to demolish these buildings and to erect seven dwellings; split between a mews terrace of five dwellings and a pair of semi-detached dwellings. All seven dwellings are proposed to have the same external appearance, layout and floor space and would be split over three floors. There is a former back-land development in close proximity to the west of the application site, which has been completed. This is in the form of a cul-de-sac (namely Pottery Close) and, as such, it is not considered that the redevelopment of the site in question would represent an isolated back-land development in this location. The presence of Pottery Close in close proximity, indicates that this type of backland development is characteristic of the area.

- 8.8 The existing building which fronts Harrington Road on the site is two-storeys in height with rooms in the roof space. The proposal would involve the loss of this property, which is an end of terrace dwelling. It would be replaced by a landscaped frontage and the vehicle/pedestrian entrance to the site. The flank wall of no.196 Harrington Road is proposed to be given a rendered finish, in order for it to have a similar appearance to the existing flank wall of no.198 (which is to be demolished). The loss of no.198 Harrington Road would result in no.196 Harrington Road becoming an end of terrace dwelling. Although no.198 Harrington Road is not a listed building and is not protected by any local or statutory designation, the proposed development would need to be of sufficient high quality in order to allow the removal of the existing dwelling. The existing row of terraced dwellings consists of eight houses and other terraces within Harrington Road vary in the number of dwellings they contain. There is a degree of unity in the scale and roof forms of the existing terraced dwellings in the street, which are predominantly treated with hipped roofs. It was considered under the previously refused application on the site, (reference 22/03596/FUL) that the combination of the loss of the end of terrace dwelling (with no.196, having a gable ended roof) and the introduction of a steel A-frame and green wall would not only disrupt the symmetry of the terrace through the loss of the hipped roof form but would also introduce an incongruous feature (by way of a large steel frame and green wall to the flank wall of No. 196 Harrington Road). The current proposal does not have the previously proposed A-frame and green wall and seeks to provide a simpler rendered form which is more in-keeping with other end of terrace properties within the surrounding suburban context. Although the loss of the existing dwelling would be regrettable, there are other terraces in the locality that vary in number of dwellings and others which provide gable ended elements with rendered flank walls. Third party comments refer to the loss of the end terrace property as having a detrimental impact upon the coherent and uniformed rhythm of terraced properties (given that each end terrace house has stained glass book-end which would be lost). However, the property does not have a statutory listed designation and the owners of each end of terrace property could change the glazing without the need for any consent from the Council. As such, this could not be a reason to refuse planning permission. In addition, concern has been raised by third parties over the structural integrity of no.196 Harrington Road following the demolition of no.198. This is not a material planning consideration and would be a civil matter that would need to be addressed by the developer. Given the above assessment, it is not considered that the demolition of no.198 Harrington Road and the resulting rendered flank wall to no.196 Harrington Road would have a significantly detrimental impact upon the street scene to sufficiently warrant the refusal of permission.
- 8.9 A large part of the surrounding area predominantly consists of natural landscape features (i.e. trees, hedging and planting beds) which are planted directly in the ground. The proposal seeks to provide soft landscaping as a buffer to the side boundary with no.196 Harrington Road, some planting to the site frontage and planting to the southern boundary of the site which it shares with the South Norwood Country Park. The proposed built form has been reduced and the soft landscaping increased based on the previous proposal (reference 22/03596/FUL) and, although the proposal would introduce areas of hard landscaping for parking and access, there is a need to provide parking and a delineated pedestrian access into the site and the type of hard surfacing materials to be used can be controlled by condition.



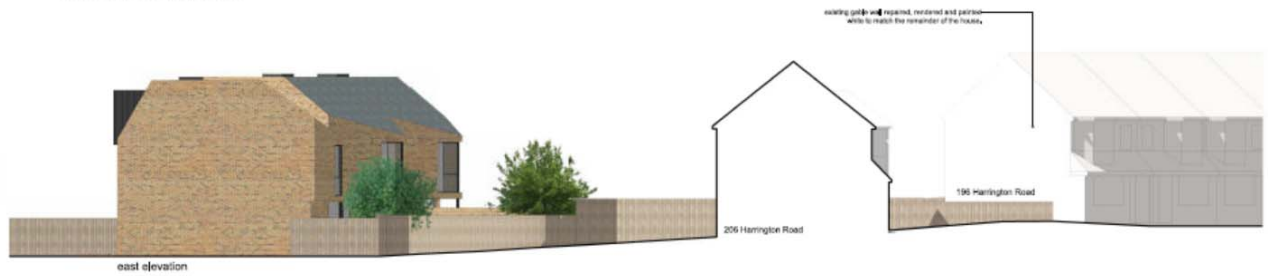
8.10 The site already predominantly consists of hardstanding and the removal of the dwelling fronting Harrington Road would create an open vista with views towards the South Norwood Country Park when viewed from Harrington Road. The proposed soft landscaping has been carefully arranged to reduce the impact of the hardstanding arrangement and the need to provide the hard landscaping to provide parking and access would weigh heavily in the planning balance. The hard and soft landscaping ratio is not considered to have a significant detrimental impact upon the street scene to sufficiently warrant the refusal of permission.

8.11 The proposed dwellings would be split into a terraced 'mews' block of 5 dwellings and a pair of semi-detached houses. The proposed dwellings would all be two-storey with accommodation in the roof space. The overall ridge height of the roof would be similar to properties at No.200-210 Harrington Road. Some contextual analysis of roof forms has been submitted with the application. The character of the surrounding area has been assessed and the proposed design incorporates linear roof lines with first floor bays, porch overhangs, repetitive features and minimal detailing which reflects the surrounding context and design features found within the locality of the site. The eaves height of the dwellings varies between 5.7 and 6.7 metres in height and the dwellings would be approximately 8.7 metres high at their highest point. The height of the proposed dwellings has taken the datum lines from the surrounding properties and the height and design of the low roof profile has been assessed and considered acceptable

in

this

context.



8.12 With regards to the proposed architectural expression, the submitted contextual analysis which supports the design identifies linear roof lines with first floor bays, porch overhangs, repetitive features and minimal detailing. These features have been used in the design of the proposed dwellings and whilst there are some differences with the properties in Harrington Road, this is considered acceptable given that the visibility of these dwellings from the road would be limited. In addition, dwellings in Harrington Road are not ubiquitous and there are differences between different terraces. There is no 'in principle' objection to the proposed materials palette however, in order to ensure this design approach and expression is successful, the Council would require the developer to commit to the quality of detailing represented in the submitted documentation (namely no eaves overhang, integrated guttering etc). Such detailing, if an application was successful, could be secured by condition.



*Image 3: Proposed Streetscene CGI*

8.13 With regards to the proposed building footprint, the ground floor level of the proposed built form would result in a separation distance of approximately 3 metres from the northern boundary at its closest point and approximately 4.4 metres from the southern boundary with South Norwood Country Park at its closest point.



8.14 The development would occupy the vast majority of the plot width and there was concern raised under the previous application (reference 22/03596/FUL) that the quantum and spread of built form within the site would leave limited space for any meaningful soft landscaping. However, the scheme has now been reduced from nine units to seven and there has been an increase in soft landscaping within the site; particularly towards the southern end of the parking/turning area which adjoins South Norwood Country Park. Although the rear garden amenity spaces are smaller than those of the surrounding dwellings, these spaces would be typical of a mews type development and would provide adequate space to serve as a garden for a family dwelling, being in compliance with the private amenity space requirements set out in the London Plan. As a result of this assessment, it is considered that the scale, massing and layout of the proposed dwellings is acceptable and in keeping with the surrounding area. As such, it is considered that the development would conform to Policies D3 and D4 of the London Plan 2021 and Policies SP4 and DM10 of the Croydon Local Plan 2018.

### **Quality of residential accommodation**

8.15 LP 2021 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 which align with national requirements. CLP policy SP2.8 also deals with quality and standards. The proposed dwellings, which are all 3-bed, 6 person units would be required to be at least 108sqm in floor area and all of them would exceed these minimum requirements; all measuring approximately 115sqm. Furthermore, all dwellings would provide ground floor and roof level built-in storage which would exceed the minimum space standards and all bedrooms within the proposal comply with parts 2, 3, and 4 of London Plan Policy D6 in relation to bedroom size standards. The proposed internal floor to ceiling heights of the units at ground floor level measures approximately 2.45 metres and the dormer element of the second floor bedroom would also be less than 2.5m (measuring approximately 2.15m in height). However, each dwelling would have a floor to ceiling height of 2.5m for at least 75% of the floor space



of the entire dwelling and, as the floor to ceiling heights would be 2.5 metres high for the majority of the dwellings, on balance, this would be acceptable. Furthermore, all seven dwellings would be dual aspect. Residents would gain access to their properties by walking along the footpath positioned to the front of Houses 1-7. To ensure that acceptable privacy is maintained for occupiers of these dwellings at ground floor level, the proposal seeks to allow sufficient space to be retained for defensible planting in front of ground floor windows and it is intended that the proposed landscaping condition would require details of this to ensure acceptability.



*Image 4: Pedestrian pathway and frontage (including defensible planting)*

8.16 There is provision for ground level private amenity spaces for all seven dwellings which measure between 25sqm and 65sqm and these would be acceptable in terms of size. Under the previous application submission (reference 22/03596/FUL), it was noted that there are a number of trees to the south of the dwellings which form part of the South Norwood Country Park and there was concern that this could restrict the amount of natural daylight and sunlight into the rear gardens and rear facing windows of the dwellings proposed at that time. It is normal practice that Daylight and Sunlight Assessments do not consider trees. However, given the specifics of this case, a revised Daylight and Sunlight Assessment has been submitted which includes an assessment of the trees within South Norwood Country Park. The assessment concludes that, with regard to daylight, all of the rooms tested meet or surpass the winter recommendations. It is noted, however, that there are a number of habitable rooms which fall short of the daylight provision targets during the summer. Whilst this is the case, the BRE guidance explains that provided the targets are met in the winter months, daylight year round is likely to be adequate to serve future occupiers. The assessment concludes that, in the opinion of the author, *'the proposed development will provide adequate levels of daylight'* which the Council concur with, on balance, given the urban location of the site. Of the 42 habitable room windows being proposed, 26 of these would exceed the 50% required by BRE standards for daylight penetration in the summer months and those that fail to meet the 50% requirements have at least 31% of daylight during summer months. With regards to daylight during winter months, all of the 42 habitable rooms which were assessed would exceed the 50% BRE

requirements for daylight penetration. With regards to sunlight, all of the dwellings also have at least one habitable room which receives a total of at least 1.5 hours of sunlight on 21 March and having assessed these results, it is considered that the proposal would provide a high quality of internal accommodation to serve future occupiers..

- 8.17 With regards to the private amenity space being provided, the original submission stated that at least 58% of the rear gardens would achieve at least 2 hours of daylight and sunlight on the spring equinox. However, this Daylight and Sunlight Assessment did not show the overshadowing of the trees to the south and this document has since been amended under the current submission. The revised Assessment shows that, when considering the deciduous trees as opaque objects, all of the proposed rear gardens would fall short of the recommendations with two of the gardens (serving plot nos.1 and 7) achieving zero daylight and sunlight on 21 March. The Assessment states that, when excluding trees, all gardens would meet the BRE recommendations and that, *‘in reality, the amount of sunlight on the ground on 21 March will actually be between the amount of light with and without trees.’* The Daylight and Sunlight Assessment further considers that *‘the BRE guide states that the dappled shade of a tree is more pleasant than the deep shadow of a building (this applies especially to deciduous trees). The aim is to have some areas of the garden in partial shade under trees while leaving other parts of the garden or amenity area in full sun.’* The Council consider that, as the dwelling itself would not be heavily reliant on artificial light, the shortfall of the garden spaces achieving the required daylight and sunlight to meet BRE guidance would not result in sufficient harm to the future living conditions of future occupiers to sufficiently warrant the refusal of permission alone, particularly given the high quality of internal living accommodation being provided and given the urban context of the application site itself.
- 8.18 Third party comments refer to the proximity of the tram lines to the rear of the proposed dwellings and the impact this could have on residential amenity. However, the separation distance between the rear walls of the proposed dwellings and the tram lines would be approximately 30 metres and there are a number of trees between the tram lines and the proposed dwellings which would create a form of sound insulation. The tram lines run much close to other properties in the locality and it is not considered that this would result in significant noise and disturbance to the detriment of future occupiers. It is considered that the resulting standard of accommodation would be acceptable, on balance, and would conform to the provisions of London Plan 2021 Policy D6 (Housing quality and standards) and Croydon Local Plan 2018 Policy DM10.

### **Accessible Dwellings**

- 8.19 LP Policy D7 states that 10% of new build housing should meet Building Regulation requirement M4(3) ‘Wheelchair User Dwellings’; and all other dwellings should meet the Building Regulation requirement M4(2) ‘Accessible and Adaptable Dwellings’ which requires step free access to all units and the facilities of the site.
- 8.20 The proposed development would be step free and, as the properties would be individual three storey dwellings, no lift would be required. Each dwelling would provide an accessible WC at ground floor level and refuse and cycle storage is provided in purpose built stores to the northern boundary with the rear gardens of no.200 Harrington Road. No disabled parking bays are to be provided within the site however, as the proposal is not a major development and there are no Part M4(3) compliant

dwellings being proposed under this submission. It is considered that this arrangement would be considered acceptable.

### **Impact on neighbouring residential amenity**

- 8.21 Policies SP6 and DM23 of the Croydon Local Plan (CLP) 2018 require new development to minimise air and noise pollution. Policy DM10 seeks to ensure that the amenity of the occupiers of adjoining buildings are protected including from overlooking, loss of light or visual intrusion and ensuring that lighting schemes do not cause glare and light pollution. The supporting text of CLP 2018 Policy DM10 states that a separation distance of 18-21 metres is ordinarily sufficient to mitigate against direct overlooking and therefore 18 metres between clear glazed windows, as a minimum, are required in this instance. The upper floor windows of the dwellings would be angled and would be approximately 19.4 metres from the upper floor rear elevations of nos.200-206 Harrington Road at their closest point. The upper floor window of house no.7 would be approximately 19 metres from the rear windows of no.196 Harrington Road. However, the upper floor window of house no.6 would be approximately 10.5 metres from the single storey rear elevation of no.200 Harrington Road at its closest point. As the single storey elements of the properties in Harrington Road are closer than 18 metres, the upper floors include angled Oriel windows to the front elevation to direct views away from the properties in Harrington Road. The upper floor window panes which face north are capable of being obscure glazed and fixed shut to prevent undue overlooking to the properties in Harrington Road as the Oriel window has a vertical element which can be clear glazed and openable. Such an arrangement could be secured by planning condition to ensure that the development would not result in the significant overlooking or loss of privacy to the detriment of the neighbouring properties.
- 8.22 The proposed dwellings would have a lowered profile to the northern side of the dwellings which seeks to reduce the impact of the massing on neighbouring properties with higher eaves heights of approximately 6.7 metres, lower eaves heights of 5.7 metres and the dwelling would be approximately 8.7 metres high at their highest point of the roof ridges. Having assessed the heights and separation distances, the “25 degree” vertical angle between the existing and proposed dwellings would be exceeded in this case. The proposed dwellings sit due south of nos.200-210 Harrington Road and, given their low roof profile combined with the separation distance, it is not considered that there would be any significant loss of light. Furthermore, the separation distances, the use of obscure glazing and the angle nature of the upper floor windows are unlikely to result in significant light pollution to the surrounding properties. Having regard to the separation distances proposed, despite the predominantly three storeys in height (including the roof), it is not considered that the development would have a significantly overbearing impact upon the residents of nos.196-206 Harrington Road nor would the height, quantum and massing of the development significantly overpower or appear unduly overbearing or visually intrusive upon the adjacent properties to warrant the refusal of permission.
- 8.23 Although the introduction of seven additional family properties to the south of the properties in Harrington Road would generate some noise, the land to the south has an operational tram line which creates some ambient noise already; albeit limited by the tree buffer and separation distance which currently exists. The site is located within a built-up urban area surrounded by residential properties and it is considered that the introduction of seven new homes with the resulting separation distances between the

existing and proposed properties would not cause undue noise and disturbance to the detriment of the surrounding properties. Furthermore, it is not considered that they would result in significant light pollution to the surrounding properties and the development would therefore conform to the residential amenity aspects of Policy DM10 of the Croydon Local Plan 2018.

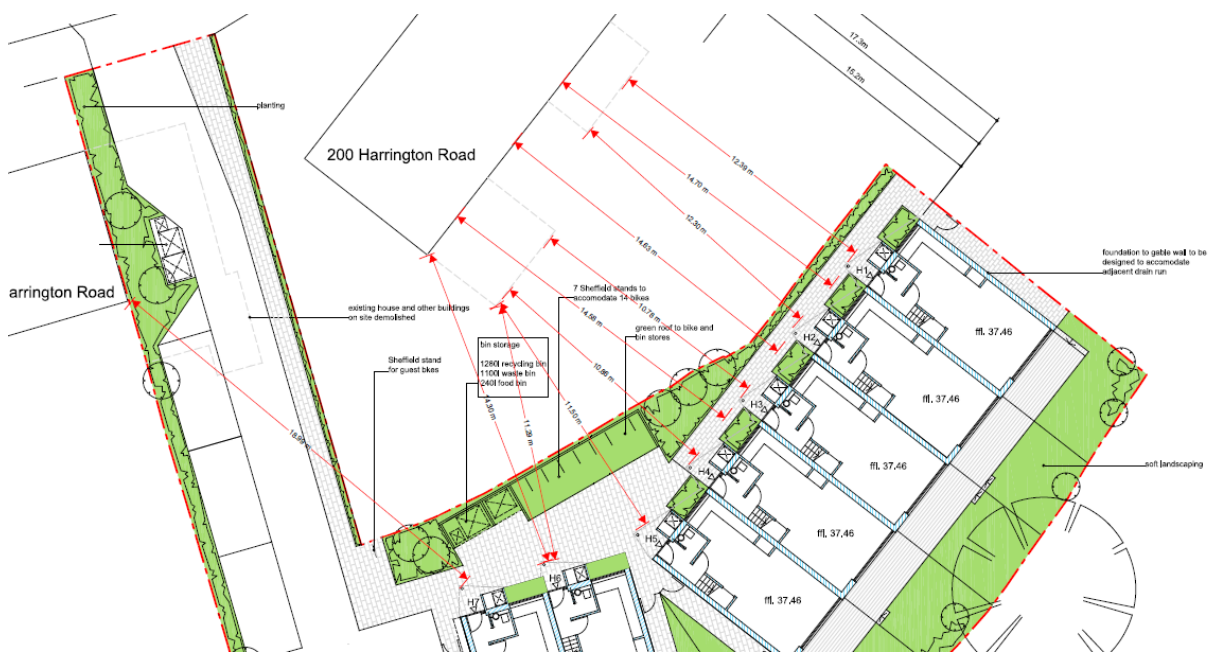


Image 5: Distance to neighbouring properties

8.24 With regards to the proposed landscaping along the shared boundary and to the southern end of the parking area, such landscaping details would be secured through condition and will need to be retained and maintained for a period of 5 years after completion. Given the proposed soft landscaping buffer, it is not considered that tandem parking along the boundary with no.196 Harrington Road would result in significant harm to the amenities of this property to warrant a refusal of planning permission. The separation distance, be it on the modest side, would be retained by the soft landscaping to ensure that the use of these parking spaces would not result in sufficient harmful noise and disturbance to warrant the refusal of planning permission. With regards to the cycle and refuse storage located close to the rear boundary of no.200 Harrington Road, this would be of a single storey nature and its low scale would not be significantly harmful to the character of the area. Third party comments refer to the ability to use these structures to obtain access to the rear of these properties however it is considered that the introduction of the dwellings to the rear will offer a degree of natural surveillance to this area. As such, it is not considered that the proposed development would result in in an increase in crime and anti-social behaviour. Details of external lighting could be secured via condition to ensure that the proposal increases this surveillance whilst ensuring that it would not result in significant light pollution.

8.25 It is acknowledged that with any build, whilst there may be limited disturbances and inconveniences for neighbouring properties during the construction period. However, the refusal of planning permission based on construction impacts alone cannot be justified. A Construction Logistics Management Plan can be secured through condition which would seek to protect neighbouring amenities as far as possible during this time. In addition, under the Control of Pollution Act 1974, the Council has a Construction Code of Practice which sets out when construction and demolition work can occur, and

it is not expected that works will be permitted to take place out of these hours. This would be placed as an informative (in the event planning permission is granted) and is enforceable under Environmental Health legislation.

- 8.26 Third party comments refer to the impact of the development upon existing local services; including schools, doctor/GP availability, shops, public transport and other local services. The proposal seeks to provide seven family sized dwellings which is not considered to result in a significant impact upon the availability of existing local services to sufficiently warrant the refusal of permission. In addition, the proposed development would be liable for CIL payments which would contribute to the delivery of local infrastructure.
- 8.27 Overall, any potential amenity impacts on neighbouring occupiers are considered to have been adequately mitigated by the proposed separation distances between neighbouring properties and mitigation measures that can be secured by planning condition. Furthermore, the orientation of the windows within the proposed development and the use of obscure glazing to the north facing upper floor north facing windows would be sufficient to mitigate adverse impacts and the proposal would therefore comply with CLP Policy DM10.

### **Transport Impact**

- 8.28 Policy T5 of the London Plan 2021 and Policies SP8, DM29 and DM30 of the Croydon Local Plan 2018 seek to promote development which makes full use of public transport, cycling and walking; does not have a detrimental impact on highway safety for pedestrians, cyclists, public transport users and private vehicles; does result in a severe impact on local transport networks; reduces the impact of car parking; provide car and cycle parking spaces as set out in the Local Plan and ensures that cycle parking is designed so that it is secure.
- 8.29 The site is located in an area with a PTAL of 2. However, it is in close proximity to Harrington Road Tram Stop. The site currently has off-street parking space located to the side of the existing dwelling. The site is not within a Controlled Parking Zone (CPZ) and the proposal seeks to provide seven parking spaces to serve the proposed seven units. A Parking Stress Survey has been submitted with this application which demonstrates that the overnight parking stress is already at 87%. Based on the information provided within the Transport Survey and the use of the census information, the proposed quantum of spaces to serve the development would be acceptable subject to a condition which requires spaces to provide Electric Vehicle Charging Points (EVCPs). Furthermore, the applicant has submitted swept path analysis for the parking spaces which shows that the number of manoeuvres required to be able to turn on site are not excessive and this would be acceptable. To facilitate this proposed development, the vehicular access would be widened and has sought to provide a gap between the existing access serving no.200 Harrington Road and the proposed access into the site. This arrangement would prevent an unduly wide vehicular crossover with no breaks for pedestrians using the footway. The Council consider that the proposed width, the introduction of a delineated pedestrian route and the proposed visibility splays would be considered acceptable subject to a condition restricting the height of any obstructions within the visibility splays being kept below 0.6m in height. There would also be sufficient space within the site to service the dwellings from Harrington Road with regards to delivery and servicing vehicles and there is also sufficient space for ambulance vehicles, which are shown to be able to

enter, turn and exit the site in a forward gear. As such, the development is considered to be acceptable from a highway and pedestrian safety perspective.

- 8.30 Given the location of this site, a Section 106 Agreement or Unilateral Undertaking would be required to be entered into to remove access to resident on street parking permits (should a Controlled Parking Zone be introduced in the surrounding roads) and contracts in council run car parks for all units. This would also secure £1500/unit towards improvements to sustainable transport including, but not limited to, on street car clubs with EVCP's as well as EVCP's in general as per policies in the Local Plan. Funding could also contribute towards the extension and improvements to walking and cycling routes in the area. Membership of a car club if this application is approved, must be secured for 3 years. Furthermore, a Section 278 Agreement will be required for all works to the public highway; with costs to be borne by the applicant. Furthermore, a Footway / Carriageway Condition Survey is required to be submitted prior to a start of works at the site, with photographs of all areas and a brief report identifying any existing issues.
- 8.31 The proposed scheme shows that the cycle parking is proposed to the northern boundary located centrally between the dwellings. The proposal would include a communal cycle store for all dwellings that has sufficient space to allow for the required number of Sheffield stands to store 14 cycles including two of these spaces which allow for the storage of wider/adapted bikes with a clear 1.5m width on the side of the stand. All London Cycle Design Standards and Cambridge residential cycle design standards are required to be met and visitor cycle parking is required to be in well overlooked area and preferably covered. Compliance with these requirements is possible given the proposed site layout and such details would be secured by planning condition to ensure conformity with the provisions of Policy T5 of the London Plan 2021 and Policies SP8, DM29 and DM30 of the Croydon Local Plan 2018.

### **Refuse and Recycling**

- 8.32 Policy DM13 of the Croydon Local Plan 2018 requires development to sensitively integrate refuse and recycling facilities within the building envelope, or within landscape covered facilities located behind the building line; ensure facilities are visually screened; provide adequate space for the temporary storage of waste materials generated by the development; and ensure facilities are safe, conveniently located and easily accessible by occupants, operatives and their vehicles.
- 8.33 The application submission states that the refuse/recycling will be managed by a private waste management company due to the distance of the bins from the public highway. The applicant proposes the implementation of a private waste contract whereby a waste contractor will be employed to access the site and drag communal bins from the bin store to/from the bin store to the collection point which is within 20 metres of the highway to allow the Council's Waste Collection Team to collect the waste from the site and take it to the collection vehicle which would be parked on Harrington Road.. This arrangement would be considered acceptable subject to a Refuse Management Plan being submitted and approved by the Council and this could be secured by planning condition. The communal refuse store is to be located to the northern boundary with the rear garden of no.200 Harrington Road and the applicant has confirmed that, based on an assumption of each 3 bed property generating 240L of waste per week, this would amount to 1680L of waste per week within the site. Assuming 60% would be residual and 50% recycling, this would require 1 x 1100L

Eurobin for residual waste and 1 x 1280L Eurobin for recycling. An additional 240L bin for food waste has also been provided within the store as well as a 240L garden waste bin to the frontage of each dwelling. The refuse/recycling collection point will be required to accommodate the garden waste bins on one of the weeks when these collections occur and a bulky goods area is also required. It is considered that there is sufficient space within the site to accommodate this and this could be secured by planning condition. Provided this is the case, it is considered that the development would conform to the provisions of Policy DM13 of the Croydon Local Plan 2018.

### **Trees and Biodiversity**

- 8.34 Croydon Local Plan Policy DM28 requires developments to accord with the recommendations of BS5837 2012 (Trees in relation to design, demolition and construction) or equivalent and seeks to avoid the loss or the excessive pruning of preserved trees or retained trees where they make a contribution to the character of the area and avoid the loss or deterioration of irreplaceable habitats, including ancient woodland, hedgerows and veteran trees. The proposed development would not result in the removal of any on-site trees however the development would be close to the root protection areas of trees outside of the site. The application includes a Tree Survey, Arboricultural Impact Assessment and a Tree Protection Plan. These have been assessed by the Council and it is considered that the proposed development would conform to the provisions of Policy DM28 of the Croydon Local Plan 2018 with regards to tree protection. Compliance with the measures detailed in the submission would be secured by planning condition.
- 8.35 The NPPF July 2021, in chapter 15 (Conserving and enhancing the natural environment), paragraph 180d (previously 174d) states that "opportunities to improve biodiversity" should be "integrated" into a scheme's design. Local Plan Policy DM27 requires proposals to a) Incorporate biodiversity on development sites to enhance local flora and fauna and aid pollination locally; b) Incorporate biodiversity within and on buildings in the form of green roofs, green walls or equivalent measures; c) Incorporate productive landscapes in the design and layout of buildings and landscaping of all major developments; d) Have no adverse impact on land with biodiversity or geo-diversity value.
- 8.36 The submission includes an Ecological Impact Assessment which relates to the likely impacts of development on designated sites, protected species and Priority species & habitats and identification of appropriate mitigation measures. This has been assessed by the Council's Ecology Consultant and they are satisfied that there is sufficient ecological information available for determination of this application. The mitigation measures identified in the Ecological Impact Assessment would be secured by a condition in order to conserve and enhance protected and Priority species particularly bats, nesting birds, and reptiles and to conform to the provisions of Policy DM27 of the Croydon Local Plan 2018.

### **Flood risk**

- 8.37 Policy DM25 of the Croydon Local Plan states that sustainable drainage systems are required in all development. The site is located in flood zone 1 and is at medium risk of surface water flooding. The development would significantly extend the built footprint into undeveloped space within the site. The application does include a Flood Risk Assessment which states that, *'as the proposed development will displace the existing*

*surface water storage (water ponding on site), the risk of surface water flooding downstream (In the South Norwood Park) could potentially increase.* This proposal seeks to lower *'the area of the rear gardens by approximately 150mm to create a flood alleviation storage.'* The proposed drainage strategy seeks to infiltrate surface water runoff to the underlying soil, however, given the fact that the site is underlain by London Clay, the strategy will seek to discharge water to the Thames Water surface water sewers which run to the rear of the Harrington Road dwellings at a rate of 1 litre per second. The proposed strategy will also seek to maximise the use of SuDS to increase the biodiversity, provide amenity, control discharge volumes, and manage water quality. The proposal will also incorporate permeable paving, green roofs and would use a Geo-cellular storage attenuation as surface water storage within permeable paving areas. Given the medium risk identified, the Council are satisfied that the development would be acceptable from a flood risk perspective subject to the developer implementing the measure contained within the report. Such flood risk mitigation measures which could be secured by condition to ensure that the development is acceptable from a flood risk perspective.

### **Fire Safety**

- 8.38 London Plan Policy D12 requires all development proposals to achieve the highest standards of fire safety and ensure that they identify suitably positioned unobstructed outside space. They should include an evacuation assembly point, appropriate features which reduce the risk to life and serious injury in the event of a fire; appropriate fire alarm systems and fire safety measures, must minimise the risk of fire spread, provide suitable and convenient means of escape and a robust strategy for evacuation as well as provision of suitable access and equipment for firefighting.
- 8.39 The proposed development seeks to provide seven dwellings all split over three floors and a Fire Safety Statement included within the submission states that the fire appliance would be able to park on Harrington Road and that fire suppression systems would be added to the houses, by way of a sprinkler system, to enable the distance to be extended from 45m to 90m which would be sufficient for all firefighting equipment to reach the furthest part of the furthest dwelling. Each dwelling would be fitted with interlinked smoke and heat alarms as well as carbon monoxide alarms where necessary. The dwellings would also have 60-minute fire resistant party walls, 30-minute partitions and fire doors with all houses fitted with sprinkler systems. The means of escape would be via the main entrance and there is sufficient space at the rear of each dwelling to provide a muster point of the main entrance is blocked by fire. All escape routes would have 30-minute fire resistance within each dwelling and it is considered that it has been suitably demonstrated that the development would meet the requirements of London Plan Policy DM12 (Fire Safety).

### **Water Usage**

- 8.40 The proposed dwellings should ensure that a minimum water efficiency standard of 110 litres/person/day as set out in Building Regulations Part G is met. Compliance with this would be secured by planning condition.

### **Other matters**

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



8.42 All other relevant policies and considerations, including the statutory duties set out in the Equalities Act 2010, the Human Rights Act, the Planning and Compulsory Purchase Act, and the Town and Country Planning Act, have been taken into account. Given the consistency of the scheme with the Development Plan and weighing this against all other material planning considerations, the proposal is considered to be acceptable in planning terms subject to the detailed recommendation set out in section 2 (RECOMMENDATION).

### **Conclusion**

8.43 All material considerations have been taken into account, including responses to the public consultation. Taking into account the extant permission, the consistency of the scheme with the Development Plan and weighing this against all other material planning considerations a resolution to grant planning permission subject to the Legal Agreement should be made without further delay.