

PART 6: Planning Applications for Decision

Item 6.1

1 APPLICATION DETAILS

Ref: 22/05178/OUT
 Location: 20 Manor Way, Purley, CR8 3BH
 Ward: Purley and Woodcote
 Description: Outline planning permission (access, appearance, layout and scale) for the demolition of the existing house and the construction of a 3 storey building comprising 8 flats together with the provision of 8 parking spaces, refuse and cycle storage, all other matters reserved (landscaping)
 Drawing Nos: 217-D-10-Rev_B; 217-D-13-Rev_B; 217-D-14-Rev_A; 217-D-15-Rev_B; 217-D-03-Rev_C; 217-D-12-Rev_A; 217-D-08-Rev_B; 217-D-01; 217-D-11; 217-D-00; 217-D-07; 217-D-06; 217-D-09; 217-D-17; Design and Access Statement (September 2020 Ob Architecture); Broxap Cycle Parking Specification, Highways Technical Note (24 April 2023 Motion); Fire Statement (SilverLeaf Group V1.1) and Arboricultural Method Statement (April 2023 David Archer Associates).
 Applicant: Mr Justin Owens
 Case Officer: Mr Hoa Vong

Housing Mix					
	1 bed (2 person)	2 bed (3 person)	2 bed (4 person)	3 bed (5 person)	TOTAL
Existing	0	0	0	1	1
Proposed (market housing)	2	1	2	3	8

Vehicle and Cycle Parking (London Plan Standards)	
PTAL: 1a	
Car Parking maximum standard	Proposed
10	8
Long Stay Cycle Storage minimum	Proposed
14	16
Short Stay Cycle Storage minimum	Proposed
2	2

1.1 This application is being reported to committee because:

- Councillor Samir Dwesar made representations in accordance with the Committee Consideration Criteria and requested committee consideration
- 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:
 1. Sustainable transport contribution of £12,000
 2. S.278 agreement to secure highways works
 3. Monitoring fee
 4. Payment of the Council's reasonable legal costs
 5. 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. Submission of reserved matters within 3 years development shall be begun not later than five years from the date of this permission or two years from the final approval of all of the reserved matters
2. Development to be carried out in accordance with the approved drawings and reports

Pre-commencement

3. Submission of Construction Logistics Plan
4. Drainage and SUDS strategy
5. Full landscaping details including, boundary treatments, hard and soft landscaping, play space, planting, trees (including replacement planting to the front) and biodiversity enhancements. There shall be no net loss of trees.

Prior to above ground works

6. Submission of materials and design details including screening to balconies
7. Development (as far as practicable) in accordance with accessible homes requirements M4(3) and M4(2)
8. Submission of delivery and servicing plan and design of bin enclosures
9. Details of existing and proposed levels and details of the design of the proposed retaining walls

Prior to occupation

10. Details of external energy plant

Compliance

11. Obscure glazing on flank windows above ground floor level
12. Compliance with bike store layout
13. Installation of vehicle parking spaces and compliance with highways technical note
14. Installation of EVCPs at 20% active and 80% passive
15. Compliance with Arboricultural Assessment and Tree Protection Plan
16. Compliance with Fire Statement
17. Water use target of 110l/p/d
18. 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 works required
 5. Compliance with Building/Fire Regulations
 6. Construction Logistics Informative
 7. Refuse and cycle storage Informative
 8. Thames Water
 9. Any other informative(s) considered necessary by the Director of Planning and Strategic Transport
- 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 3 months 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 outline planning permission for the demolition of the existing house and the construction of a 3-storey building comprising 8 flats together with the provision of 8 parking spaces, refuse and cycle storage.
- 3.2 The matters for consideration at the outline stage are as follows:
- Access
 - Appearance
 - Layout
 - Scale
- 3.3 Landscaping would be dealt with at the reserved matters stage although is indicatively shown on 217-D-02-OBA-REV_C proposed site plan.
- 3.4 It should be noted that outline planning permission was approved in 2018 (the 2018 fallback position scheme). (18/03185/OUT: Demolition of the existing building.

Erection of a 2/3 storey building comprising 8 apartments. Provision of associated parking. APPROVED 27/09/2018) This development can still be implemented until 27/09/2023 and is a “fall back” position which holds weight in the decision-making process.

- 3.5 The design, height and massing are substantially the same. The major difference between the previously approved application and the current proposal are as follows:



Figure 1 Proposed front elevation



Figure 2 Front elevation of application approved in 2018

- Amendment to layout of flat 4 to change this from a 2 bedroom 4 person to a 3 bedroom 5 person home thus enabling the scheme to provide 3 family homes

compared to 2 as previously approved and over 30% of the proposed homes as 3 bedroom dwellings

- Incorporation of a lift to all floors providing improved access for all users
- Introduction of a wheelchair accessible home on the ground floor in addition to all other homes now meeting M4(2) standards
- Slightly enlarged parking bays to provide better access and manoeuvrability with the site
- Introduction of fire protected lobbies to provide improved fire safety within the development
- Larger and improved private amenity spaces to some of the apartments in excess of what is required under National Design Standards
- Slightly enlarged retaining walls.

Site and Surroundings

- 3.6 The application site lies on the north-western side of Manor Way and is currently occupied by a large, detached bungalow. The existing property sits in an elevated position with an inclining driveway.
- 3.7 The surrounding area is typically residential in character comprising large, detached dwellings varying in design and character. Most properties are sited within generous plots benefitting from large quantities of established soft landscaping. Land levels rise from the south-east to the north-west and therefore the properties on the south-eastern side of Manor Way are typically a storey lower to those properties to the north-west.
- 3.8 The application site is not located within an Environment Agency Flood Zone, though is at risk of surface water flood risk, albeit low. The site has a PTAL rating of 1a which indicates that the site has poor access to public transport.
- 3.9 The rear garden backs onto the Webb Estate Conservation area.



Figure 3 Aerial Site Plan

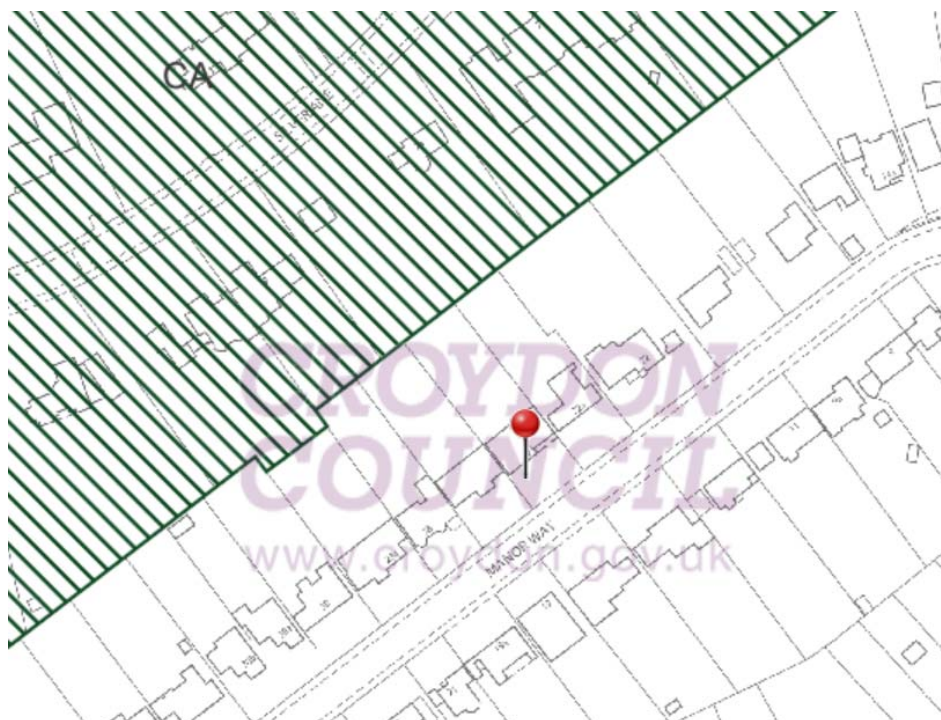


Figure 4 Webb Estate Conservation Area (shown hatched to the rear of the site)

Planning Designations and Constraints

3.10 The site is subject to the following formal planning constraints and designations:

- PTAL: 1a
- The application site is not located within an Environment Agency Flood Zone, it has a low risk of surface water flooding and is within a Critical Drainage Area (Purley Cross)

Planning History

- 3.11 The following planning decisions are relevant to the application:
- 3.12 17/03581/FUL: Construction of first floor with accommodation in roofspace to include the erection of a dormer extension and installation of rooflights; erection of single storey rear extension. APPROVED 30/11/2017
- 3.13 18/01272/PRE – Pre-Application Advice: To demolish the existing house. To erect a three-storey building comprising eight apartments. To provide the associated parking.
- 3.14 18/03185/OUT: Demolition of the existing building. Erection of a 2/3 storey building comprising 8 apartments. Provision of associated parking. APPROVED 27/09/2018.
- 21/02308/RSM- Reserved matters relating to Landscaping (Condition 1) attached to planning permission ref. 18/03185/OUT for demolition of the existing building. Erection of a 2/3 storey building comprising 8 apartments. Provision of associated parking. Approved.
- 3.15 20/02907/OUT - Outline application for the consideration of access, appearance, layout and scale only for the demolition of existing dwellinghouse and the construction of four single dwellinghouses with an associated vehicular access and parking. APPLICATION WITHDRAWN.
- 3.16 20/06275/OUT- Outline application for the consideration of access, appearance, layout and scale only for the demolition of existing dwellinghouse and the construction of four single dwellinghouses with an associated vehicular access and parking. REFUSED AT PLANNING SUB- COMMITTEE 28/06/2020 FOR THE FOLLOWING REASON:
1. The proposed development, due to the positioning of the proposed backland houses and associated driveway and parking spaces, would fail to respect the locally distinctive development pattern, layout and siting of buildings, contrary to Croydon Local Plan 2018 Policies SP4.2, DM10.1, DM10.7 and DM10.10; and London Plan 2021 Policy D3.
- 3.17 This application was for four detached houses, including two at the rear of the site. The Council's refusal reason was focussed on the location of those "backland" houses, which were considered to conflict with the surrounding pattern of development. The decision was subsequently appealed and dismissed by the inspector on 07 February 2023 (Appeal Ref: APP/L5240/W/22/3305227) for the following reason:
1. The proposed development would harm the character and appearance of the area. This would be contrary to those aims of Policies SP4 and DM10 of the Croydon Local Plan 2018 and Policy D3 of The London Plan (March 2021), which taken together, seek to preserve local character and respect existing development patterns.

4 SUMMARY OF KEY REASONS FOR RECOMMENDATION

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

- The principle of the intensified residential development is acceptable given the fallback position and the residential character of the surrounding area
- The proposal includes a mix of 3no. 3-bedroom family sized dwellings (an increase compared to the extant consent) and would provide a high standard of accommodation
- The design and appearance is similar to the fallback position and would be a positive contribution to the area. The northern side of Manor Way comprises mostly 2-storey detached buildings with pitched roofs; the proposal would replace a bungalow (which is an anomaly within its setting) with a building that better reflects the character of the houses on either side.
- The impact on neighbouring amenity would not be substantially harmed
- 8 car parking spaces would be provided on site, which would not result in a significant impact on parking stress.
- The proposal has addressed the more recent policy requirements within the London Plan (since the fallback consent was granted), including improved accessibility and fire safety.
- Suitable planning obligations and conditions have been recommended.

5 CONSULTATION RESPONSE

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

Tree officers

5.2 No objection subject to securing tree protection measures and tree plan

Highways

5.3 Following concerns regarding the access to refuse, cycle parking and parking, the applicant has provided additional information and amendments which address officers' concerns.

6 LOCAL REPRESENTATION

6.1 9 neighbouring properties were notified about the application and invited to comment. The application has been publicised by way of a site notice displayed in the vicinity of the application site together with a press notice. 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: 40 Objecting: 40 Supporting: 0

No of petitions received: 0

6.2 Purley & Woodcote Residents Association

- Not in Keeping with the area
- Obtrusive by design
- Over Development
- Overlooking

- Residential Amenity
- Traffic or Highways
- Loss of a family home
- Not enough amenity space
- Inadequate parking

6.3 The following Councillor and MP made representations which are summarised below:

Councillor Samir Dwesar [objecting]

- Cumulative impact
- Design not in keeping with the area
- Obtrusive by design
- Overdevelopment
- Overlooking
- Residential amenity/Poor PTAL rating
- Traffic/Highways
- Webb Estate impact (conservation area)
- Impact to trees
- Would result in a loss of a family home and would not contribute to family accommodation.
- Cumulative impact of significant new flats built in area
- Inadequate amenity space
- There is sufficient parking
- Increased traffic movements and impact on road safety
- detrimental to the occupiers of neighbouring properties
- poor access to daylight/ sunlight
- location is not desirable for buyers of flats due to distance from Purley Station

6.4 Cllr Dwesar has also requested that the application is referred to committee for determination.

Chris Philip MP [objecting]

- The proposal would be a significant overdevelopment of the site due to its size, height, density, footprint, bulk and massing and would be harmful to the street-scene
- Over-intensification of the site by the replacement of a single bungalow dwelling with 8 flats spread over three storeys – this would be significantly out of character with the local area
- This residential area is predominantly characterised by one or two storey detached dwellings of varying styles and sizes that are set back from the road and sit within spacious plots with large rear gardens. There are generally views between and beyond properties of mature trees and landscaping which provide a verdant appearance. This proposal would be at odds with this and therefore out of character
- Unattractive modern interpretation design would be out of character
- Concreting over garden space and the unacceptable loss of vegetation and natural habitat – the proposed block of 8 flats will occupy a much larger footprint than the current single family dwelling
- Concreting over of front garden to create unattractive car park

- The proposal would be detrimental to the amenity of the residents of neighbouring properties due to visual impact, overlooking and loss of privacy
- Density led not design led

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

Objection	Officer comment
Character and design	
Not in keeping with the area Obtrusive design Overdevelopment Impact on conservation area Should be kept as a bungalow	The site is considered to be suitable for intensification and design would be in keeping with the area. The existing bungalow is not protected from demolition. The proposed height would be more in keeping with the surrounding 2-storey houses, and the materials would be high quality and reference those on the nearby buildings.
Neighbouring amenity	
Noise Overlooking Loss of light	The impact on neighbouring amenity would be limited with no significant overlooking or loss of light. Noise impacts would be in keeping with a residential use of this nature and would be acceptable.
Quality of accommodation	
Not enough amenity space	Sufficient amenity space is provided in line with policy.
Transport and Highways impacts	
Not enough parking Would cause traffic congestion Would cause highways danger	Parking is proposed in line with London Plan standards. The scheme is not of a size which would cause significant levels of traffic of cause danger
Tress and ecology	
Impact on trees Mature landscaping at risk	An arboricultural impact assessment has been submitted and tree protection measures are considered to be acceptable. Tree officers have raised no objections. Landscaping is a reserved matter however an increase in biodiversity and planting would be secured by condition.
Other	
Strain on drainage, infrastructure, healthcare and schools Cumulative impacts Would impact community safety	The scheme is not of a size which would cause significant impacts on local infrastructure, and its impacts would be mitigated by the Community Infrastructure Levy payment, other

	than sustainable transport which will be mitigated by a s.106 obligation. The proposal would not cause harm to community safety
Not material matters	
Covenant for single family dwelling on the property and in Manor Way Negative impact on property prices Negative treatment of previous speakers at planning committee by members	These are not material planning considerations

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
- D12 Fire Safety
- H1 Increasing housing supply
- H2 Small sites
- H10 Housing size mix
- Policy HC1 Heritage conservation and growth
- 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
- 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
- Policy DM18: Heritage assets and conservation
- 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

Planning Guidance

National Planning Policy Framework (NPPF)

- 7.2 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.

Local Planning Guidance

- 7.3 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:

- National Model Design Code
- Webb Estate and Upper Woodcote Village Conservation Areas Appraisal and Management Plan SPD Section 106 Planning Obligations in Croydon and their relationship to the (2007)
- Conservation Area General Guidance Supplementary Planning Document (2013)
- 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 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. Transport
7. Flood risk and energy efficiency
8. Other Planning Issues
9. Conclusions

Principle of development

- 8.2 The Croydon Local Plan sets out a housing target of 32,890 homes over a 20-year period from 2016-2036 (1,645 homes per year). The London Plan requires 20,790 of those homes to be delivered within a shorter 10 year period (2019-2029), resulting in a higher annual target of 2,079 homes per year.
- 8.3 The Croydon Local Plan also sets out a target for development on Windfall sites of 10,060 homes (approximately 503 per year). The London Plan requires 6,410 net completions on small sites (below 0.25 hectares in size) over 10 years, with a small-sites housing target of 641 per year.
- 8.4 The strategy for delivering these homes is set out in Croydon Local Plan 2018 Policy SP2.2 of the Croydon Local Plan (CLP) (2018), which separates this target into three sub targets with 10,760 new homes to be delivered within the Croydon Opportunity Area, 6,970 new homes on specific site allocations, and 10,060 homes delivered across the Borough on “windfall” sites which include the application site. London Plan 2021 Policy H2 (Small Sites) advises that small sites (below 0.25 hectares in size) must make a substantially greater contribution to new supply across the city. Croydon’s annual target for homes on small sites is 641 homes a year (31% of the annual target). Therefore, increasing the rate of housing delivery from small sites is a strategic priority.
- 8.5 The proposed intensification would represent a more efficient use of this space and would support the principles of national and local planning policy which seek to achieve efficient use of land and increase housing in London of which there is an acute shortage.
- 8.6 The existing use of the site is residential and as such the principle of redeveloping the site for residential purposes is acceptable subject to achieving a high quality development and other provisions of the development plan as assessed in this report.
- 8.7 It should also be noted that a similar proposal was granted permission in 2018 and it is considered that the proposal is substantially the same albeit with some minor improvements as detailed in p. 3.5 of this report.

Design and impact on character of the area

- 8.8 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. London Plan policy D3 states that a design-led approach should be pursued and that proposals should enhance local context by delivering buildings and spaces that positively respond to local distinctiveness.

8.9 The surrounding area is a mix of detached houses of varying height, including bungalows and large two-storey houses under substantial pitched roofs, many of which have extended into the roofspace.

8.10 The applicant proposes to demolish the existing bungalow and construct a three storey building comprising 2x one bedroom, 3x two bedroom and 3x three bedroom flats. The proposed height with the third storey contained in the roofspace is of a similar height and scale to that of the immediate neighbours as shown in the below figure.



8.11 Objections have been raised with regards to the proposed design stating that the proposal would be out of keeping with the area and an overdevelopment of the site.

8.12 The height when viewed from the street scene would be in keeping with surrounding development and in some cases lower. In terms of overall massing, the below figures show that there are a number of properties of a comparable massing and although there would be some smaller dwellings, overall due to the mix of properties in the area the proposed height and massing would be in keeping within the streetscene.



Figure 5 24 Manor Way and 22 Manor Way



Figure 6 17 Manor Way and 28 Manor Way

- 8.13 The proposed dwelling would have asymmetrical proportions with a catslide roof picking up on nearby architectural features. The white render and hanging tile facade is sympathetic to the wider character of Purley which is characterised by the Arts and Crafts movement. The development is considered to be well designed responding to the site's context and would sit comfortably within the streetscene.
- 8.14 The design approach follows the design features and materials of the surrounding buildings, although some of the detailing, such as the taller windows, would be slightly more contemporary. There are differences in the age and style of the buildings on the street, such that this would not conflict with the local character. The previously consented planning application (the "fallback" position) was granted whilst the Croydon Suburban Design Guide was in effect, and before the London Plan 2021 was adopted. Since it was approved, the Council's guidance promoting gentle changes in character, with larger buildings on small sites, has been revoked. However, as the proposed building would only be 2 storeys tall with additional accommodation within a pitched roof, the scale would still be in keeping with the surroundings, with a lower ridge height than either neighbour, and it would respect rather than evolving the existing character.
- 8.15 Whilst the proposed building's footprint would be deeper than those in those in the area, views of the side elevations would be largely obscured and therefore the impact on the streetscene and wider character of the area would be limited.
- 8.16 The application is located immediately adjacent to The Webb Estate & Upper Woodcote Village Conservation Area. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 places a duty upon the local planning authority in determining applications for development affecting listed buildings to pay special regard to the desirability of preserving the building or its setting. Under section 72, the Act also requires that special attention be given to preserving or enhancing the character or appearance of a conservation area.
- 8.17 The proposal would not affect any of the important views highlighted within the conservation area appraisal and in addition to this due to the presence of a number of existing mature trees and other foliage, the proposed development would not be visible when viewed from within the Conservation Area, including from the nearby properties on Silver Lane. In glimpses where the proposed development would be visible, the dwelling would appear very similar in height, massing and siting to the existing dwellings in the area and would not appear out of context.

- 8.18 As a result, the proposal would preserve the setting of the Conservation Area, thereby avoiding any harm to the significance of a designated heritage asset.
- 8.19 The applicant has overall demonstrated that a design led approach in accordance with London Plan Policy D3 has been taken which respects the character of the area and which is considered to be of a high quality and of an appropriate height and mass for this location. This can be seen in the proposed materials which match those in the area, how the roofspace has been utilised to create a third storey and height which sits comfortably between the adjoining properties.
- 8.20 A large proportion of the rear garden would be retained with enhanced and formalised amenity space for future occupiers which is capable of providing playspace. The retention of boundary vegetation would enhance such areas ensuring that the strong verdant character is retained.



Figure 7 Proposed Site Plan

- 8.21 A parking forecourt is proposed which is similar to that of neighbouring properties, albeit for a larger number of cars. The hardstanding area has been kept to a minimum with good opportunities for soft landscaping therefore minimising its visual impact. Given the established parking practises in the surrounding area the forecourt parking is not considered to result in demonstrable harm to the character and appearance of the surrounding area.

8.22 The proposal would therefore comply with policies SP4.1 and DM10 and London Plan policy D3 as it is of an appropriate form and mass for this site and a suitably high design quality which responds appropriately to its context. The proposal is therefore considered to comply with the development plan in this respect.

8.23 In addition to the development plan, planning applications are also required to be considered with regard to material considerations. In this case, these include a “fallback” position in the form of the 2018 consented planning application, which was for a very similar development proposal. If the application were to be refused, the developer could still implement that consent instead, which comprises their “fallback” position. That would result in a development with a very similar appearance, and it is incumbent on the decision maker to decide whether the proposed development would be more harmful than the fallback position. Even in the event that the proposed character, appearance, and layout were considered not to respect the surrounding area, given the visual similarity with the fallback position, officers are of the view that significant weight should be afforded to that fallback position such that refusal on character grounds is not warranted.

Quality of residential accommodation

8.24 Policy D6 of the London Plan 2021 outlines housing development should be of a high-quality design and provide adequate-sized bedrooms and residential units, as well as sufficient floor to ceiling heights and light.

8.25 CLP policy SP2.8 requires residential development to comply with the minimum standards set out in the Mayor of London’s Housing Supplementary Planning Guidance and National Technical Standards (2015). Furthermore, proposals should meet minimum design and amenity standards set out in the CLP and other relevant London Plan and National Technical Standards (2015) or equivalent.

8.26 CLP policy DM10.4 requires proposals for new residential development to provide a minimum amount of private amenity space of 5m² per 1–2-person unit and an extra 1m² per extra occupant thereafter.

8.27 Policy D5 of the London Plan outlines development should be convenient and welcoming with no disabling barriers and policy D7 requires at least 10 per cent of dwellings to meet Building Regulation requirement M4(3) ‘wheelchair user dwellings’.

Unit	Size (bedroom/person)	GIA (sqm) proposed	Min. GIA (sqm)	Amenity Space (sqm)	Min. Amenity Space (sqm)	Built in storage space (sqm)	Min. built in storage space (sqm)
1	1b/2p	51	50	5.8	5	1.5	1.5
2	3b/4p (M43)	95	74	24.7	7	2.8	2.5
3	2b/4p	70	70	8	7	2	2
4	3b/4p	80	74	7	7	2.5	2.5
5	2b/4p	76	70	19	7	2	2
6	2b/3p	63	61	6	6	2	2
7	1b/2p	51	50	6.5	5	1.5	1.5
8	3b/5p	109	86	10	8	2.8	2.5

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

- 8.28 All dwellings would meet or exceed external and internal space standards and would also be dual aspect. The standard of accommodation would be high quality and would in many cases far exceed minimum space standards.
- 8.29 The scheme would differ from the fallback position by including a lift. As a result, there would be step-free access and 1 dwelling would be built to M4(3) (Wheelchair User) accessible standards with the remaining dwellings built to M4(2) (Wheelchair Accessible or Adaptable) standard. These details would be secured by condition with the applicant required to submit detailed drawings showing how each dwelling complies with the standards; however, it is noted that due to the slope of the site, the residents will not have step-free access to all of the communal gardens. In this respect, the proposal is an improvement on the previously consented 2018 scheme.

Impact on neighbouring residential amenity

- 8.30 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.
- 8.31 A number of objections have been raised with regards to the impact of the proposal on residential amenity.
- 8.32 The application site lies between 18 and 22 Manor Way with the land rising to the north-west. The development would have separation distances of approximately 12 metres from 18 Manor Way and 13 metres to 22 Manor Way. Rearward projections of approximately 5 -12 metres would exist beyond both No.18 and No.22. Given the generous separation distance, the rearward projections and the presence of boundary screening the development is not considered to appear visually intrusive to either of these neighbouring properties or impact daylight/ sunlight.
- 8.33 With regards to overlooking, no side facing habitable room windows are proposed at or above first floor level in either flank elevation. A condition is also recommended to secure details of side screening all projecting balconies. It should be noted that screening is not currently shown however given this would be a minor addition and the applicant has agreed to this in writing, this approach is acceptable. There would be some increased overlooking to the rear due to the number of units proposed however this would be in keeping with the existing nature of residential development of the area and raises no objections.
- 8.34 As such it is not considered that the proposed development would give rise to a loss of privacy. The proposal would also not give rise to significant noise impacts, being a standard residential use with no other noise creating uses proposed.
- 8.35 In terms of issues with noise and general disturbance as a result of the building works such matters could be limited through a condition as part of a Construction Logistics Plan/Management Strategy.
- 8.36 Separation distances with other properties on Manor Way would be well over 30m which would prevent any other significant impacts on neighbouring amenity. For these reasons the proposed development would have an acceptable relationship with the adjoining and neighbouring properties.

Trees, landscaping and biodiversity

- 8.37 London Plan policy G6 requires proposals to manage impacts on biodiversity. The proposal complies with Local Plan policy DM27 and London Plan policy G6.
- 8.38 Policy G7 requires that wherever possible, existing trees of value should be retained. Similarly, CLP policy DM28 specifies that proposals which result in the avoidable loss of retained trees where they contribute to the character of the area will not be acceptable. CLP policy DM10 also requires proposals to incorporate hard and soft landscaping.
- 8.39 Policy DM10.8 seeks to retain existing trees and vegetation and policy DM28 requires proposals to incorporate hard and soft landscaping.
- 8.40 The application site is not located in an area of nature conservation importance nor is there any evidence of protected species on site or tree preservation order.
- 8.41 10 trees are to be felled together with 1 group which are all classed as category C or lower, including three large trees located in the front garden. The Council's Tree Officer has raised no objection to the tree survey, tree protection plan or method statement. It is considered that the replacement species, sizes and locations listed within the landscaping proposal are suitable mitigation planting. Whilst it is noted that the trees to the front do contribute to the streetscene, the [SJ1][VH2] harm overall would be limited, outweighed by the benefits of the proposal including additional housing and also mitigated by the proposed replacement planting. A condition would be attached to ensure all works are carried out in accordance with the tree protection plan and to secure an enhancement in tree planting.

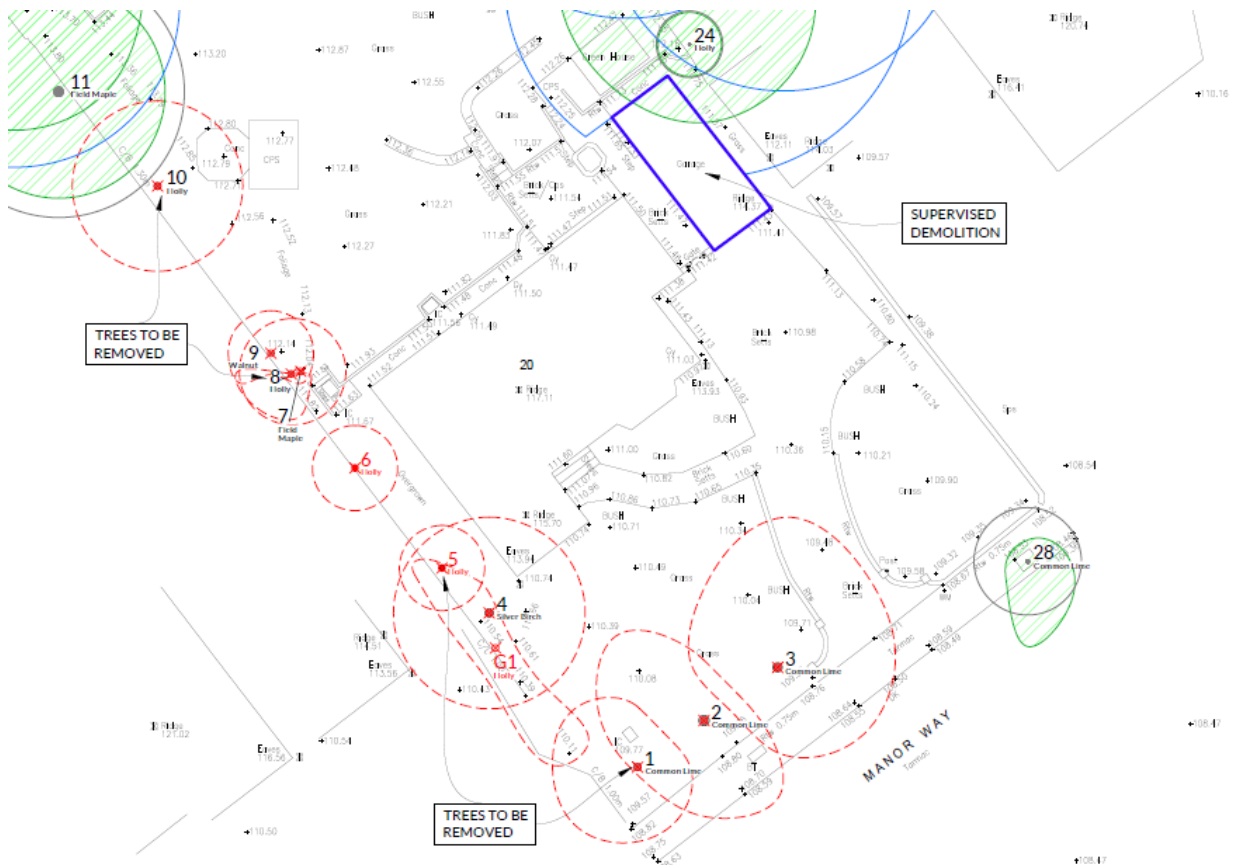


Figure 8 Tree Removal

- 8.42 The proposed development includes some relatively significant changes in land level. At the front of the site, the land is currently banked up towards the house. The land level adjacent to the street would be unchanged, however excavation is proposed to allow accessible gradients. This would result in excavation of up to approximately 1.3m at the front elevation of the proposed building, which is the same as was previously approved. Other houses on the street have significant level changes within their front gardens, due to the sloping nature of the street, such that this would not be out-of-keeping with the surrounding area.
- 8.43 To the rear, there would be excavation to create lightwells for the ground floor flats. This would be up to approximately 3.1m in depth and again was previously approved. This excavation would have no impact on the street scene or the character and appearance of the Conservation Area to the rear. Although these level changes are largely as previously approved, some of the excavation would be slightly increased to accommodate improved accessibility with a gentler driveway gradient (with the previous proposal being part 1:6 and part 1:20, and the new proposal being all 1:20). All of the level changes along the boundaries would result in reduced, rather than increased land levels, and all of the retaining walls would be within the site and would not form the boundaries with the neighbours. Landscaping is a reserved matter and a condition is recommended requiring the existing and proposed levels and details of the design of the proposed retaining walls.
- 8.44 While the applicant has provided an indicative landscaping proposal as part of this outline application, full landscaping details including, boundary treatments, hard and soft landscaping, playspace, planting, trees and biodiversity enhancements would be secured at the reserved matters stage. There would be no net loss of trees and also replacement tree planting to the front. Officers are therefore satisfied that, subject to the recommended conditions, the development would not result in a loss of trees or biodiversity and there would be an overall enhancement.

Transport

- 8.45 London Plan policies T4, T6, and T6.1 (and Table 10.3) set out parking standards for proposed development and seek to ensure that proposals should not increase road danger. Similarly, CLP policies SP8, DM29, and DM30 promote sustainable growth and provide further guidance with respect to parking within new developments.
- 8.46 The site has a Public Transport Accessibility Level (PTAL) of 1a which indicates very poor access to public transport.
- 8.47 The site is located to the north of Manor Way, South Croydon and is located approximately 1.2 kilometres west of central Purley. Manor Way is a lit single-carriageway road subject to a 20 miles per hour speed limit.

Vehicle Parking

- 8.48 London Plan policy T6.1 would permit up to 1.5 spaces per 3+ bed unit and 1 space per 1-2 bed unit which equates to a maximum of 10.
- 8.49 8 car parking spaces are proposed. The applicant has provided 2021 Census data information for the local area which has shown that on average car ownership is under 1 car per flat and therefore, the proposed development would likely generate around 8

cars. Highways officers have accepted this level of parking based upon this data and the provision of parking would therefore be appropriate.

- 8.50 2.4 metres by 25 metre vehicular visibility splays (to reflect the 20mph speed limit) are shown together with 1.5 metre by 1.5 metre pedestrian visibility splays from the proposed access which is acceptable.
- 8.51 The proposed flats would generate approximately three morning peak hour vehicular trips, and two evening peak vehicular trips. These increases in traffic would be acceptable and would not result in harm or unacceptable stress to the highways network. [SJ3][VH4]
- 8.52 £12,000 would also be secured via S106 towards either on street car clubs and general expansion of the EVCP network in the area and improvements to walking and cycling routes in the area. A condition is recommended requiring the submission of a construction Logistics Plan (CLP) and a condition survey of the surrounding footways and carriageway prior to commencement of works on site.

Cycle Parking

- 8.53 Policy DM30 and London Plan policy T5 would require provision of a total of 18 cycle parking spaces for residents are proposed together with 2 visitor parking spaces.
- 8.54 The development proposes a communal cycle store which includes a two-tier storage space for 16 spaces (2 per unit) plus an adaptable store. The cycle stores would also have separate access measuring 2.5m wide. The development would therefore adhere to the provision given by the London Plan (2021) alongside guidance contained in the London Cycle Design Guide.

Refuse and Recycling

- 8.55 Policy DM13 requires the design of refuse and recycling facilities to be treated as an integral element of the overall design. Bin stores are located externally and after amending plans in line with highways officer comments, the applicant has demonstrated that collection points, access for refuse vehicles and walking distances would be acceptable.
- 8.56 The development is provided with a communal bin store to the side of the building with a collection point adjacent to the highway. A refuse vehicle would park on street, with operatives wheeling bins from the collection point to the vehicle. The collection point is located within 10 metres of the highway, which accords with parameters for acceptable carry distances as set by LBC. The collection would take place with the existing refuse collection which already takes place on Manor Way.
- 8.57 These details are acceptable and a condition is recommended for the submission of final details of enclosures, along with a servicing and delivery management plan.

Flood risk and energy efficiency

Flood Risk

- 8.58 CLP policies SP6.4 and DM25 seek to reduce the risk of flooding in the borough and ensure that all developments incorporate sustainable urban drainage systems (SUDS) to ensure surface run-off is managed as close to the source as possible. Similarly,

London Plan policies SI 12 and SI 13 require proposals to ensure that flood risk is minimised and mitigated, and that surface water runoff is managed as close to its source as possible.

- 8.59 The site is within flood zone 1 and at a very low risk of surface water flooding. It is within a **Critical Drainage Area**^[SJ5], which are areas where development could have an influence on the risk of flooding within a Local Flood Risk Zone. In these locations, there is a need for surface water to be managed to a higher standard than normal to ensure any new development will contribute to a reduction in flooding risks in line with NPPF. Therefore, a SUDS strategy is required to mitigate the impacts.
- 8.60 SUDS features will need to form part of the landscaping strategy, which is a reserved matter. Similarly to the previous consent on the site, a condition would be included to require full & final detailed design of the SUDS system at which time the actual proposed site & drainage levels can be confirmed.

Energy Efficiency

- 8.61 CLP policy SP6 requires the development to achieve the national technical standard for energy efficiency in new homes, which has since been superseded by more stringent building regulations requirements. No condition is therefore necessary to achieve energy efficiency measures, however a condition is recommended to allow control of the visual and noise impacts of any external plant needed. Policy SP6 also requires the development to meet a minimum water efficiency standard of 110 litres/person/day. This would be secured by condition to ensure compliance with policy SP6.

Fire safety

- 8.62 London Plan policy D12 requires all development proposals to achieve the highest standards of fire safety, which should be considered from the outset. Part A sets out six requirements that should be achieved on all developments.
- 8.63 The applicant has submitted a fire safety strategy which suitably addresses the relevant requirements of policy D12. Fire safety measures would also be subject to Building Regulations approval.

Conclusions

- 8.64 The provision of 8 dwellinghouses is acceptable in principle. There is an existing dwelling on site and the site is large enough to sustainably accommodate increased residential use.
- 8.65 The proposed block would be of a high quality design and high quality materials have been specified. The quality of accommodation is acceptable and the quantity of car parking, cycle parking and access arrangements are all acceptable. Tree losses would be mitigated by replacement planting and landscaping subject to an acceptable “reserved matters” application.
- 8.66 In this particular case, there is a strong fallback position which, in the view of officers, should be afforded substantial weight, although it is ultimately for the decision maker to decide how much weight to afford it. Given the similarities between the proposals it would be difficult to explain why this proposal would cause more harm in terms of visual amenity, and there are improvements in terms of the provision of more family-sized

homes and step-free access which mean that this application would result in a higher quality development than the fallback position.

- 8.67 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.
- 8.68 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 (APPROVAL).