

**1 APPLICATION DETAILS**

Ref: 22/02285/FUL  
 Location: 2 Welcomes Road, Kenley, CR8 5HD  
 Ward: Kenley  
 Description: Demolition of existing bungalow and outbuildings and erection of a three-storey building containing 6 x 2-bedroom flats and 2 x 4-bedroom semi-detached houses (total 8 dwellings), with associated parking and landscaping.  
 Drawing Nos: PL22-634-01 REV.A (Site Location Plan), PL22-634-02 REV.A (Existing Block Plan), PL 22-634-03 REV.D (Proposed Site Layout), PL 22-634-04 REV.D (Proposed Block Plan), PL22-634-05 REV.D (Impressions 1), PL 22-634-06 REV.D (Section A), PL22-634-08 REV.D (Section B), PL22-634-09 REV.D (Section C & D), PL 22-634-10 REV.B (Plots 1 & 2 Floor Plans), PL22-634-11 REV.B (Plots 1 & 2 3D Perspectives), PL 22-634-12 REV.B (Plots 1 & 2 Rear & Side Elevations & Section), PL 22-634-20 REV.D (Apartment Block Ground Floor Plan), PL22-634-21 REV.D (Apartment Block First Floor Plan), PL 22-634-22 REV.D (Apartment Block Roof Space Plan), PL22-634-23 REV.D (Apartment Block Roof Plan), PL22-634-24 REV.D (Apartment Block Front & Side Elevations), PL22-634-25 REV.D (Apartment Block Rear & Side Elevations), PL 22-634-30 REV.D (Proposed External Finishes, PL22-634-31 REV.D (Fire Strategy Layout), AKJH.22-009-1 REV A (Landscape Masterplan), 01 (Existing Plans), 02 (Existing Elevations), 03 (Existing Elevations).  
 Applicant: Chartwell Land and New Homes  
 Case Officer: Joe Sales

	<b>2 beds</b>	<b>3 beds</b>	<b>4 beds</b>	<b>Total</b>
<b>Existing</b>			1	1
<b>Proposed (all market housing)</b>	6		2	8

<b>Number of car parking spaces</b>	<b>Number of cycle parking spaces</b>
8	16

**1.1 This application is being reported to committee because:**

- The ward councillor (Cllr Ola Kolade) made representations in accordance with the Committee Consideration Criteria and requested committee consideration.
- The application has been referred by the Kenley and District Residents' Association who 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 subject to the completion of a S.106 agreement to secure the following heads of terms:
- (a) A financial contribution of £12,000 towards sustainable travel improvements
  - (b) Carbon Offset contribution
  - (c) Air Quality contribution
  - (d) Local Employment and Training (construction phase) contribution plus Local Employment and Training Strategy
  - (e) Monitoring fee(s)
  - (f) Payment of the Council's reasonable legal costs.
- 2.2 That the Director of Planning and Sustainable regeneration has delegated authority to issue the planning permission and impose conditions and informatives to secure the following matters.

### **CONDITIONS**

#### Standard Conditions

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

#### Pre-commencement conditions

3. Submission of Construction Management Plan and Construction Logistics Plan.
4. Submission of details relating to external materials/details including balcony design.
5. Submission of Drainage Strategy/SUDS details.
6. Biodiversity enhancement strategy.
7. Tree Protection
8. Fire Statement

#### Pre-Occupation Conditions

9. Submission of landscaping, details including new tree planting and maintenance.
10. Submission of site waste management plan for refuse collection.
11. Submission of cycle/refuse details.
12. Submission of EVCP details.
13. Submission of external energy plant and mechanical equipment details.

#### Compliance Conditions

14. Development to be carried out in accordance with the approved tree protection plan.
15. Development to be carried out in accordance with the approved ecological surveys and reports.

16. Development to be carried out in accordance with accessible homes requirements M4(2) and M4(3).
17. Implementation of car parking as shown on plans with no boundary treatments above 0.6m in the sightlines
18. Compliance with energy and water efficiency requirements.
19. No additional side facing windows in dwelling houses.
20. Removal of permitted development rights in dwelling houses.
21. 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. Waste to be collected only from the communal waste store.
  4. Contact waste team prior to occupation.
  5. Highways informative in relation to s278 and s38 works required.
  6. Boilers.
  7. Construction Logistics Informative (in relation to condition 3)
  8. Compliance with Building/Fire Regulations.
  9. Any other informative(s) considered necessary by the Director of Planning and Strategic Transport.
- 2.3 That the Committee confirms that adequate provisions has been made, by the impositions of conditions, for the preservation or planting of trees as required by Section 197 of the Town and Country Planning Act 1990.
- 2.4 That if, by three months, the legal agreement has not been completed, the Director of Planning and Sustainable Regeneration has delegated authority to refuse planning permission.

## **3 PROPOSAL AND LOCATION DETAILS**

### **Proposal**

- 3.1 The proposal is for the demolition of the existing dwelling and the comprehensive redevelopment of the site to provide a block of flats to the front of the site comprising 6 units and a pair of semi-detached dwellings to the rear.
- 3.2 The unit mix would comprise of 6x2-bedroom dwellings and 2x4-bedroom units (total 8 units).
- 3.3 Access to the site is via Welcomes Road with a parking forecourt area to the front of the site which can accommodate 4 car parking spaces. An access road is also provided to the rear of the site which accommodates a further 4 spaces, 1 of which is designated as a disabled bay (Total 8).
- 3.4 Each dwelling would be afforded private amenity spaces in the form of balconies or private rear gardens and a communal amenity area is provided for the apartment block with an area allocated for child play space.

- 3.5 Cycle and refuse stores are provided within the site and an area for bulky waste is also offered.
- 3.6 The building to the front of the site would be two full stories in height with accommodation in the roof space and the dwellings to the rear of the site would be two stories in height.



**Figure 1-Proposed Development from Welcomes Road**

### **Background**

- 3.7 Amended plans and clarification details have been submitted as part of the application process. The resultant changes included a reduction in unit numbers from 9 to 8 and have been considered accordingly. These changes did not change the nature of the proposal as originally consulted upon and therefore re-consultation was not required.

### **Site and Surroundings**

- 3.8 The site is located on the western side of Welcomes Road and comprises a bungalow with two outhouses to the rear. The site benefits from a large rear garden that slopes steeply upwards and generous defensible space. The site has two points of access leading from Welcomes Road.
- 3.9 The surrounding area is residential in character comprising detached bungalows and two storey properties on large plots and some flatted schemes under construction or recently completed. The architectural design and use of materials in the immediate area are varied and the area can be characterised as semi-rural.
- 3.10 Welcomes Road is a private road; however, it is also a designated public footpath and bridleway. The application site has a PTAL rating of 2 which indicates poor access to

public transport and is within the Kenley Transport Study Area. The site is designated with the Croydon Local Plan as being within an area of focussed intensification.



**Figure 2-Aerial View of the Site**

## **Planning History**

3.11 The following planning histories are relevant to the application site.

- 91/02763/P- Erection of attached garage. (Permission granted 15/01/1992).
- 91/02875/P- Construction of dormer window and erection of single storey side/rear extension. (Permission granted 08/04/1992).
- 92/01162/P- Formation of additional vehicular access to provide ingress and egress drive; erection of lych gate. (Permission granted 26/08/1992).

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

4.1 Approval is recommended for the following reasons:

- The principle of residential development on the site is acceptable given its proximity to Kenley Station and being sited within the Kenley area of focussed intensification.
- Unit mix is acceptable and provides family size housing.
- The design and appearance of the development is appropriate for the site and the surrounding context.
- There would be no undue harm to the residential amenities of adjoining occupiers.
- The living standards of future occupiers would be acceptable and compliant with the Nationally Described Space Standards and the London Plan.
- Subject to the imposition of conditions, the proposed development would not have an adverse impact on the operation of the highway:

- Subject to conditions, the proposals would not have an adverse impact on flooding.
- Trees/landscaping and ecology can be controlled by conditions; and
- Sustainability aspects can be controlled by conditions.

4.2 The following section of this report details the officer's assessment of the application against the material planning considerations and the relevant policies which have contributed to the recommendation that planning permission is granted.

## 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 17 neighbouring properties were notified about the application and invited to comment. Site and press notices were also published. 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: 35  
 Objecting: 34 (including KENDRA)  
 Supporting: 1

6.2 The following local groups/societies submitted representations:

- Kenley and District Residents' Association

6.3 The following Councillor submitted representations:

- Councillor Ola Kolade

6.4 In terms of the neighbouring responses that were received during the statutory consultation period, the concerns which have been raised and those which are material to the determination of the application are set out within the table below and these are also addressed in detail within the assessment of the material considerations within this report.

<b><u>Objection</u></b>	<b><u>Officer comment</u></b>
<b><i>Character and design</i></b>	
Overdevelopment of the site	Addressed in paragraphs 8.16-8.25.
Building is overbearing, too tall, out of character / not in keeping with the area/loss of garden/ internal layout	
<b><i>Neighbouring amenity impacts</i></b>	
Overlooking and privacy concerns	Addressed in paragraphs 8.43-8.53.

Impact on daylight/sunlight/loss of light to gardens	
Noise	
<b><i>Parking and highways</i></b>	
Insufficient parking will lead to overspill parking on surrounding road.	Addressed in paragraphs 8.61-8.64.
<b><i>Other</i></b>	
No improvement to supporting infrastructure or public transport is proposed.	A CIL contribution will be provided and a S106 contribution provided for sustainable transport contributions.
Impact due to construction traffic	Addressed in paragraph 8.75.
Increased fire risk	Addressed in paragraph 8.54-8.56.
Impact on wildlife/biodiversity	Addressed in Paragraph 8.57-8.60.
Impact on trees	Addressed in Paragraph 8.54-8.56.
Increased flood risk.	Addressed in Paragraph 8.81-8.84.
Cumulative impact of development	A CIL contribution will be provided.

6.5 The Kenley and District Residents Association (KENDRA) referred the application to Planning Committee and have raised the following issues:

- The focussed intensification areas hold little weight in the determination of the application.
- Proposed building is too tall and would result in a scale and massing that would represent overdevelopment of the site.
- Inadequate on-site car parking provision that will lead to overspill car parking.
- Poorly design parking areas that do not allow vehicles to safely manoeuvre around the site.
- No surface water management plan.
- No construction logistics plan submitted with the application.
- Poor quality of accommodation.
- Impact on neighbouring amenity.
- Impact on trees.

6.6 Local Ward Councillor, Ola Kolade, objected to the proposed development and referred the planning application to be considered by planning committee. The councillor raised the following concerns in relation to the proposed development:

- Out of keeping with the area.

- Overdevelopment of the site.
- Impact on highways safety.
- Temporary storage of waste not suitable.

## 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)

- D1 London's form, character and capacity growth
- D3 Optimising site capacity through the design led approach
- D4 Delivering good design
- D5 Inclusive design
- D7 Accessible housing
- D12 Fire safety
- D14 Noise
- G5 Urban greening
- G6 Biodiversity and access to nature
- G7 Trees and woodlands
- H1 Increasing housing supply
- H2 Small sites
- SI 2 Minimising greenhouse gas emissions
- SI 8 Waste capacity and net waste self-sufficiency
- SI 12 Flood risk management
- SI 13 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
- SP4 Urban design and local character
- SP6 Environment and climate change
- DM1 Housing choice for sustainable communities
- DM10 Design and character
- DM13 Refuse and recycling
- DM16 Promoting healthy communities
- DM19 Promoting and protecting healthy communities
- DM23 Development and construction
- DM25 Sustainable drainage systems and reducing flood risk
- DM27 Biodiversity
- DM28 Trees

- DM29 Promoting sustainable travel and reducing congestion
- DM30 Car and cycle parking.
- DM40 Kenley and Old Coulsdon

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.

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:

- A. Principle of development
- B. Design and impact on character of the area
- C. Quality of residential accommodation
- D. Impact on neighbouring residential amenity
- E. Trees, landscaping and biodiversity
- F. Access, parking and highway impacts
- G. Fire Safety
- H. Flood risk and energy efficiency

### **A. PRINCIPLE OF DEVELOPMENT**

#### Policy Background

8.2 The Croydon Local Plan states that the Council will apply a presumption in favour of development of new homes. It 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 small sites housing target of 641 per year.
- 8.4 Policy H1 (Increasing housing supply) and Policy H2 (Small sites) of the London Plan 2021 explain that:
- Boroughs should optimise the potential for housing delivery on all sites (H1)
  - Councils should pro-actively support small site development to significantly increase the contribution that small sites make towards housing delivery (H2).
  - Councils should support small housebuilders (H2).

### Demolition

- 8.5 Local Plan Policy SP2.2 does not permit developments which would result in the net loss of homes or residential land. The planning application is to replace the demolished house with new housing, which would comply with Policy SP2.2.
- 8.6 The existing building is a single storey home with accommodation within the roof space. Local Plan Policy DM1.2 states that the Council will permit the redevelopment of the residential units where it does not result in the net loss of 3-bedroom homes (as originally built) or the loss of homes smaller than 130m<sup>2</sup>.
- 8.7 The existing dwelling is in excess of 250sqm and has 4 bedrooms. The proposals would not result in the loss of a home smaller than 130m<sup>2</sup> or with 3 bedrooms and are therefore considered acceptable in terms of compliance with the above policy. In any case, 2 x new 3-bedroom houses are proposed which would adequately re-provide the family sized home being demolished.

### Proposed New Homes

- 8.8 As explained above, the development plan anticipates new housing coming forward on windfall sites, and Policy SP2.1 of the Local Plan applies a presumption in favour of development of new homes.
- 8.9 Policy H1 of the London Plan (2021) explains that incremental intensification of existing residential areas within PTALs (Public Transport accessibility level) 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. Whilst the site is located within PTAL 2, it is approximately 160m to Kenley Station. Therefore, the redevelopment of the site should be optimised in line with the policy objectives.
- 8.10 Due to the location of the site from Kenley station and compliance with the Local and London Plan Policy, the existing use of the site is residential (C3) and as such the principle of redeveloping the site for residential purposes is acceptable in land use terms.

- 8.11 Given the above the principle of additional homes at the site is acceptable subject to further considerations below.

#### Affordable Housing

- 8.12 The proposed scheme on the site for 9 units would not trigger affordable housing contributions in line with policy SP2 or London Plan policy H4 or H5.

### **A. DESIGN AND IMPACT ON THE CHARACTER OF THE AREA**

#### Policy Background

- 8.13 Policy DM10 of the Croydon Local Plan (2018) requires the siting, layout and form of new development to respect the character and appearance of existing areas. Policy SP4.1 indicates that the Council will require all new development to contribute to enhancing a sense of place and improving the character of the area. Policies SP4.1 and SP4.2 also require development to be of a high quality which respects and enhances local character. Policies D2, D3, D4 and D5 of the London Plan (2021) are also of relevance.
- 8.14 London Plan Policy H2 requires boroughs to recognise that local character evolves over time and will need to change in appropriate locations to accommodate additional housing on small sites.
- 8.15 Whilst Local Plan Policy H1 encourages the redevelopment of sites that are well connected to modes of public transport, Local Plan Policy DM10.11 explains that developments in focussed intensification areas should contribute to an increase in density and a gradual change in character. Developments may be significantly larger than existing, up to double the predominant height of buildings in the area and will be expected to enhance and sensitively respond to existing character by being of high quality and respectful of the existing place in which they would be placed.

#### Height, scale, siting

- 8.16 Local Plan Policy DM10.1 states that new developments should be of at least three storeys and DM10.11 supports up to double the predominant building height. The surrounding buildings are generally 1-2 storeys in height, under pitched roofs (2-3 storeys including the roofspaces). Up to 4-6 storeys would therefore be supported by the Local Plan in this location.
- 8.17 The height of the development across the site comprises two full floors with accommodation in the roofspace. This would achieve 3-storeys in total and would be significantly less than the maximum supported by policy. The proposed height would respect the local character, therefore complying with the aims and objectives of the guidance.
- 8.18 With regards to the layout and siting of the proposed development, it is considered that the siting of the built form of development is acceptable. The proposals are set away from the neighbouring side boundaries, maintaining a separation distance between the

proposed dwellings and the existing neighbouring properties which respects the existing layout of development that contributes to the character of the existing area.

- 8.19 There are no defined building lines along the frontage of Welcomes Road and given this existing arrangement, the siting of the proposed development is considered to integrate into the existing pattern of development. Furthermore, the depth of the proposed building, whilst deeper than the neighbour at number 4 Welcomes Road would be of a similar depth to number 10 Kenley Lane to the north of the site. The depths of the existing surrounding buildings vary in size and the proposed depth of the building fronting Welcomes Road would be considered acceptable in terms of integrating into the existing pattern of development that forms the character of the area.
- 8.20 With regards to the development to the rear of the site, it is noted that there are several existing sites that comprise backland development along Welcomes Road. Officers have previously refused planning applications for backland development on other sites on the road (outside the area of focussed intensification). However, recent appeal decisions have supported backland development on Welcomes Road where it would maintain the predominantly verdant nature of the gardens, and where the backland development would avoid harm to the street scene. Whilst neither of the immediate neighbouring sites comprise of backland development, given the appeal decisions, wider context and the policy requirement of London Plan H1 to optimise sites such as this for the purposes of redevelopment, as well as the site falling within an area of focussed intensification, the provision of utilising the rear of the site for development purposes is considered acceptable in principle.
- 8.21 The site steps up to the rear, and the backland houses would be integrated into the landscape by having two storeys of accommodation at the front (under a pitched roof), and one fewer storey at the rear, working with the sloped topography rather than introducing lightwells or other highly engineered design features. This would retain the verdant nature of the site and would limit the scale of the buildings when viewed from the rear, resulting in visual subservience.
- 8.22 In terms of the impact to the character and the appearance of the area, the existing area is suburban in character and whilst the proposed development would result in additional coverage of the site, a significant amount of green space would be left for the purposes of private and communal amenity spaces. Along with the soft landscaping proposals, it is considered that the development would ensure that the site retains its verdant character which contributes positively to the suburban character of the area. This development pattern is consistent with the surrounding built form which contributes to the suburban character of the area.
- 8.23 The London Housing Design Guide recommends that buildings should provide around an 18m to 21m separation distance between facing properties. With regards to the relationship of the proposed dwellings located within the rear of the site with those located on at the front of the site on Welcomes Road, a separation distance of 21.9m would be provided which is consistent with the relevant guidance.

8.24 The development would offer separation distances between the new dwellings to the rear of the site and the existing dwelling at number 3 Redwood Close, which is sited on the western rear boundary, of around 20m. In terms of the rear dwellings and their relationship to the neighbouring properties on Welcomes Road, a separation distance of 26m is provided to number 4 Welcomes Road and 30.7m is provided to number 10 Kenley Lane. The separation distances achieved do allow for relief between the existing and proposed built forms and offers separation distances which are generally a characteristic of the context of the area.



**Figure 3-Proposed Site Plan**

8.25 Overall, it is considered that the height, scale and siting of the proposed development would optimise the site for redevelopment in line with London Plan Policy H1 and DM10.11. The development has been sensitively designed to ensure, that the site is sympathetic and responds to the suburban character of the surrounding area and would therefore be policy compliant.

Detailed design

8.26 The design principles of the dwellings fronting Welcomes Road have been drawn from the contextual character analysis to provide an asymmetrical roof form when viewed from the street scene. The resultant dual gabled frontage would result in one larger than the other, with the more prominent gable set slightly further forward than the smaller one. This feature is considered to break up the massing of the elevation and provides definition to provide visual interest when the building is viewed from Welcomes Road. Local Plan Policy DM10.7 states that development proposals should contribute positively to the character of the area and is sympathetic with its context. The surrounding character is varied, and the

proposed form is considered to provide a traditional form which would sit comfortably in the existing street scene therefore complying with the aims and objectives of Policy DM10.7.

8.27 The proposed fenestration of the dwellings to the front of the site have taken a traditional approach in terms of their formation on the front elevation of the dwelling which would be in keeping with the traditional architectural styles of the existing dwellings within the local area.

8.28 The elevation of the building is broken up using different materials for the various external features of the building. A red stock brick is proposed for the main external facing material and a different stock brick is proposed for the bays to the front of the building to provide a contrast between the main elevation and the bay window, emphasising this feature. Brick banding is proposed around the building to add visual interest to the remainder of the building and brickwork features are proposed around the window openings to break up the massing further. A slate grey roof tile would be used for the roof of the dwelling. It is considered that the proposed material choice ensures that the development is sympathetic with the surrounding area in terms of the traditional style of architecture.



*Figure 4-CGI of Flatted Block*

8.29 It is proposed to use UPVC windows, however, given the existence of such windows in the existing street scene, and that the proposed colour (dark grey) would reduce the visual impact of the UPVC material, the proposed windows would integrate into the elevations of the existing buildings well. These will be complimented by UPVC rainwater goods which would be visible on the elevations of the building which would not be out of kilter with the existing nearby dwellings.

8.30 The proposal to the rear of the site responds to the character of the main building using similar design features and materials such as the gable frontage feature and brickwork courses around the window openings. A traditional architectural approach had been adopted and it is considered that this would provide a high-quality subservient addition to the rear of the site.



**Figure 5-CGI of Dwelling to the rear**

8.31 Overall, it is considered that development would respond to the existing traditional architectural styles and features that contribute to the visual amenities of the street scene and the character of the wider area. The proposals are therefore considered to result in a development that complies with Local Plan Policy DM10.

**B. QUALITY OF RESIDENTIAL ACCOMMODATION**

8.32 Policy SP2.7 of the local plan states that the Council will seek to ensure that a choice of homes is available in the borough that will address the borough’s need for homes of different sizes. For both market and affordable housing, this will be achieved by:

- Setting a strategic target for 30% of all new homes up to 2036 to have three or more bedrooms.

8.33 The proposed unit mix comprises 2 x 4-bedroom units and 6 x 2-bedroom units. The proposed unit mix would deliver an amount of 25% family units across the development site. Whilst this amount would fall short of the strategic target, this is a strategic target and not a requirement of development. On balance, given the typology of the family dwellings proposed which are houses and the development would still contribute sufficiently to the council’s strategic target, it is considered that the proposed unit mix would be acceptable on this occasion.

8.34 The proposed houses should be designed in line with the standards set out in the Nationally Described Space Standards (NDSS) and the London Plan Housing SPG, particularly regarding minimum floor space standards (including minimum sizes and widths for rooms/storage).

Unit	Size (bedroom/person)	GIA (sqm) proposed	Min. GIA (sqm)	Amenity Space (sqm)	Min. Amenity Space (sqm)	Built in storage space (sqm)	Min. storage space (sqm)
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1	4b/8p	185	130	148	11	Utility room >3sqm	3
2	4b/8p	185	130	148	11	Utility room >3sqm	3
3	2b/4p	82	74	11	7	2sqm	2
4	2b/4p	84	74	11	7	4sqm	2
5	2b/4p	81	74	10	7	2sqm	2
6	2b/4p	84	74	10	7	2sqm	2
7	2b/4p	81	74	10	7	2sqm	2
8	2b/4p	84	74	10	7	2sqm	2

***Scheme considered against London Plan Policy D6 and Table 3.1***

- 8.35 It is proposed to provide 2 x 4-bedroom (8 person) homes over 3 floors and 6 x 2 bedroom (4 person apartments). The Technical Housing Standards require a 4-bedroom (8 persons) unit over 3 floors to have a minimum gross internal floor area (GIA) of 130m<sup>2</sup> with 3m<sup>2</sup> built in storage, and at least 11m<sup>2</sup> of external amenity space. At 185sqm, the proposed houses would exceed these standards and would provide substantial family sizes homes with large gardens.
- 8.36 The standards also require each 2-bedroom (4 person) unit (over 1 floor) to have a minimum gross internal floor area (GIA) of 74m<sup>2</sup>, 2m<sup>2</sup> of storage space, and 7sqm of external amenity space. These would all be exceeded.
- 8.37 Each house and flat would exceed the required space standards and would provide an adequate level of accommodation for future occupiers. Given a utility room is proposed within each of the proposed dwellings and the accommodation exceeds the space requirement, it is considered there would be sufficient space available for storage. Whilst it is noted that the dwellings to the rear would be comprise a subterranean element to the rear, the kitchen and living areas would still be afforded a sufficient level of daylight through the use of windows to the side of the property.
- 8.38 London Plan Policy D6 states that housing development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. Given the orientation of the site and the apartment block, sufficient light and outlook would be provided with all homes being dual aspect.
- 8.39 All the houses would have level threshold access which would be compliant with London Plan Policy D7. A lift is also proposed within the block of flats ensuring that the units would comply with the M4(3) building regulations and complying with London Plan Policy D7 which states that at least 10% of dwellings least 10 per cent of dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(3) 'wheelchair user dwellings'
- 8.40 The London Housing SPG states that a minimum of 5 m<sup>2</sup> of private outdoor space should be provided for 1-2 person dwellings and an extra 1sqm for each additional occupant.

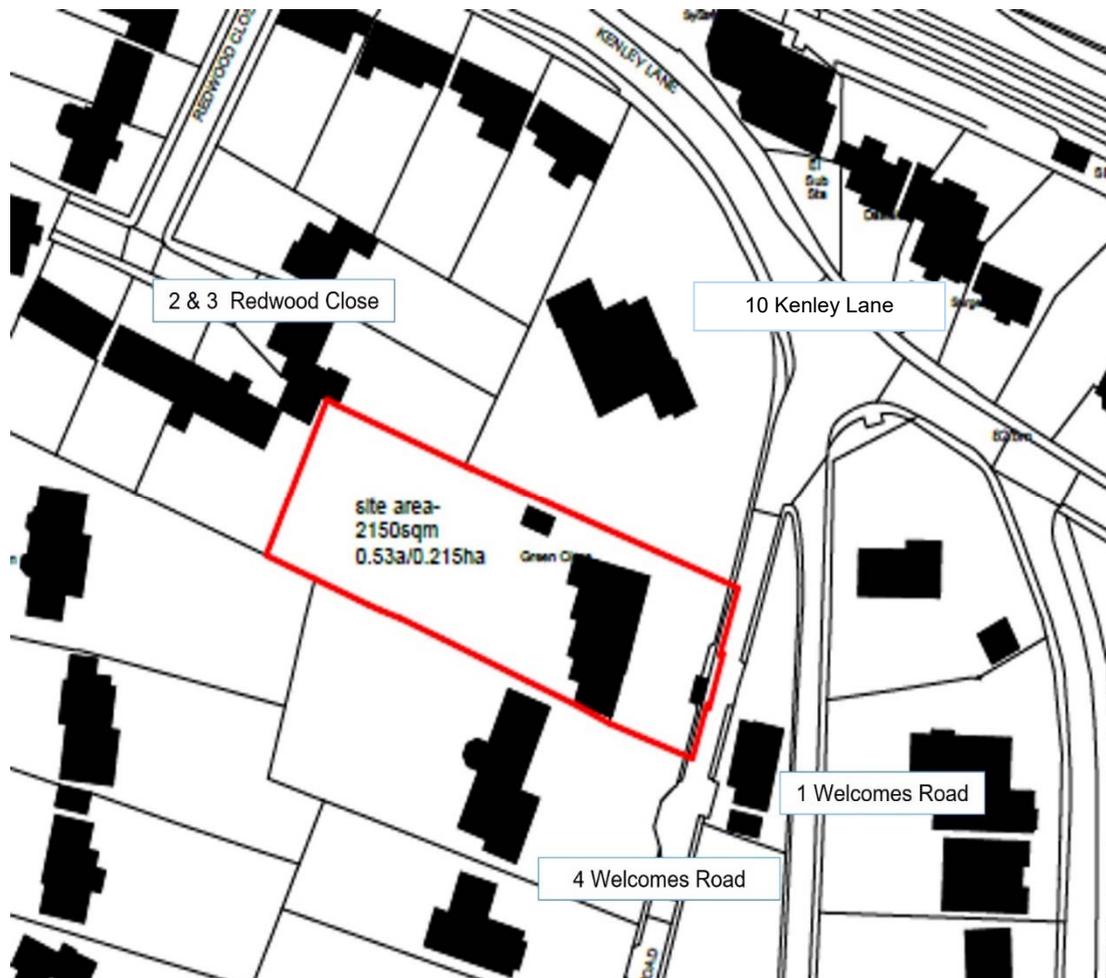
Policy DM10.4 requires proposals for new residential development to provide private amenity space that is of high-quality design and enhances and respects the local character; provides functional private amenity space.

8.41 In terms of the private amenity space provision, the dwellings would each have access to a terrace or rear garden which exceeds the required standards. Local Plan Policy DM10.5 requires new flatted development to include communal outdoor space. A rear communal garden is proposed, including 20sqm of play space, which would be directly accessible from the hallway of the flatted block.

8.42 Whilst the proposal would see an uplift in the number of units/people on site, it is considered the proposed development would offer future occupiers a good standard of amenity, including the provision of private amenity space, and thus accords with relevant policy.

### C. IMPACT ON NEIGHBOURING RESIDENTIAL AMENITY

8.43 London Plan Policy D3 (Optimising density through the design-led approach) of the London Plan explains that developments should secure safe and inclusive environments, secure outlook, privacy and amenity, provide green space and achieve outdoor /indoor environments that are inviting for people to use. Policy DM10.6 of the Croydon Local Plan requires the Council to have regard to the privacy and amenity of adjoining occupiers. Policies SP4.1 and SP4.2 seek to respect and enhance character, to create sustainable communities and enhance social cohesion and well-being.



**Figure 6-Neighbouring Properties**

8.44 The properties with the potential to be most affected are the adjoining properties at 4 Welcomes Road and 10 Kenley Lane, 1 Welcomes Road (opposite) and the properties sited to the rear of the site at 2 and 3 Redwood Close.

#### 4 Welcomes Road and 10 Kenley Lane (immediate adjoining neighbours)

8.45 These dwellings are situated immediately adjacent to the side of the application site. With regards to the proposed height of the buildings at the front of the site and as noted previously, the built form is arranged over two stories with accommodation within the roof space with an overall height of 11.2m. The Local Plan encourages development of this height within such locations. The proposed building to the front of the site also offers generous separation distances between the adjoining boundaries with 4.3m offered to boundary which is shared with 10 Kenley Lane and 6.47m to the boundary shared with number 4 Welcomes Road. Based on the policy position and the design of the building which would comply with policy in terms of height and results in a building that is not overly deep and therefore does not extend past the neighbouring rear building lines significantly, the proposed apartment block to the front of the site would be acceptable and in accordance with local policy as it would result in minimal harm to the outlook or the amenity of the neighbouring dwellings.

8.46 It is noted that several side facing windows are proposed within the apartment block however, these would be at high level or obscured glazed above ground floor level. A suitably worded condition has been recommended for the purposes of protecting the neighbouring amenity.

8.47 The dwellings located to the rear would be situated to achieve the recommended (18-21m) separation distance as set out within The London Plan Housing SPG and the Local Plan (30m to number 10 Kenley Lane and 26m to number 4 Welcomes Road). The proposals are likely to result in some oblique views between the proposed dwellings to the rear and the existing gardens at 4 Welcomes Road and 10 Kenley Lane however, the first 10m of the private amenity space would be protected from "perpendicular" overlooking as set out within Local Plan Policy DM10.6.

8.48 Given the development's compliance with the separation distances and heights set out within the Local Plan and the London Housing Design Guide, overall, the proposals are not considered to result in unacceptable harm to the outlook, privacy and amenity of the neighbouring properties along Welcomes Road.

#### 2 and 3 Redwood Close

8.49 Redwood Close is situated on the road which runs along the rear of the application site to the north-west. Number 3 Redwood Close would be sited around 20m from the proposed development and number 2 would be 19m, which would offer sufficient separation distance as to not result in an unacceptable impact to the outlook or the amenity of the neighbouring property. Furthermore, the proposed development would be only a single storey (with roof accommodation) and the rear, and the front to side facing relationship of the development site and number 3 Redwood Close would also mitigate any potential harm further.

## 1 Welcomes Road

- 8.50 1 Welcomes Road is sited immediately opposite to the application site. Street-facing views of no.1 are an existing condition, and the building's set-back from the street would ensure that minimal harm is caused in this regard.
- 8.51 The proposed development would not result in undue noise, light or air pollution uncommon to a residential area, because of an increased number of occupants on the site. The increased number of units would increase the number of vehicle movements to and from the site, but this would not be significant and would not be overly harmful. Overall, it is considered that the proposal complies with the requirements of Policy DM10.6 of the Local Plan.

## Other Amenity Impacts

- 8.52 Whilst the proposal would result in an increase in occupants on the site, the proposed development would not result in undue noise, disturbance or smells as a result of the increased number of occupants on the site and relationship with neighbouring properties given the continued residential use of the site. As such, the proposed development is considered acceptable in terms of the neighbouring amenity.
- 8.53 With regard to noise, disturbance, impact on health, conditions would be attached for a Construction Logistics Plan to be submitted (pre-commencement condition) and an informative placed on the decision in respect of the Councils "Code of Practice on the Control of Noise and Pollution from Construction Sites" which should be adhered to in order to minimise disruption and noise.

## **D. TREES, LANDSCAPING AND BIODIVERSITY**

### Trees and landscaping

- 8.54 Policy DM10.8 of the Croydon Local Plan (2018) states in exceptional circumstances where the loss of mature trees is outweighed by the benefits of a development, those trees lost shall be replaced with new semi-mature trees of a commensurate species, scale and form. Policy DM28 of the Croydon Local Plan (2018) seeks to protect and enhance the borough's woodlands, trees and hedgerows and that development is not permitted resulting in the avoidable loss or deterioration of irreplaceable habitats, including ancient woodland, hedgerows and veteran trees. Policy G7 of the London Plan (2021) is also of relevance.
- 8.55 The development includes the removal of 8 trees across the site to facilitate the development. Although there are several existing trees being removed, the site does provide an opportunity to plant several new trees as part of a comprehensive landscaping scheme. A landscaping proposal demonstrates that the development could facilitate a comprehensive landscaping proposal, including 8 new trees, which would soften the proposed hardstanding and contribute to the verdant character of the area. A condition has been recommended which requires the submission of such details. It is proposed to include that new trees will be replanted to compensate for the loss of the existing.
- 8.56 The proposed development will result in some incursions into the root protection areas of the retained trees however, a tree protection plan has been submitted as part of the application and the mitigation and protection measures are considered appropriate in

relation to minimising the harm to the health of the existing trees. A condition has been recommended that the development is carried out in accordance with this plan.

### Biodiversity

- 8.57 Policy G6 of the London Plan (2021) states development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process. This is reiterated in Policy DM27 of the Croydon Local Plan 2018 (Protecting and enhancing our biodiversity).
- 8.58 Protected species are a material planning consideration. A Preliminary Ecological Appraisal has been submitted as well as additional ecological comments which have been assessed by the Councils' ecological assessor who has raised no objection subject to securing biodiversity mitigation and enhancement measures.
- 8.59 They have recommended all mitigation and enhancement measures/or works to be carried out in accordance with the submitted Preliminary Ecological Appraisal (Darwin Ecology, December 2021) and implemented in full. It is also recommended for a biodiversity enhancement strategy to be submitted prior to slab level. The proposed headline biodiversity enhancements are supported, and would secure measurable net gains for biodiversity, as outlined under Paragraph 174d of the National Planning Policy Framework (2021).
- 8.60 The proposal would therefore not cause harm to protected species on the site, and subject to the recommended conditions would make appropriate provision for habitats and biodiversity net gain with would comply with Local Plan Policy DM27 and London Plan Policy G6.

### **E. ACCESS, PARKING AND HIGHWAY IMPACTS**

- 8.61 Policy SP8 of the Croydon Local Plan (2018) concerns traffic generation, sustainable travelling and parking standards. Policies DM29 and DM30 of the Croydon Local Plan (2018) promotes sustainable travel and reducing congestion. Policies T4, T5, T6 of the London Plan (2021) are also of relevance.
- 8.62 The TFL guidance on Public Transport Accessibility Levels (PTAL) assumes that people will walk up to 640 metres (approximately eight minutes) to a bus service and up to 960 metres (12 minutes) to a rail service. The site is approximately 160m from Kenley Station, and the bus stop (route 434) on Kenley Lane and 400m from the bus stops (route 407) on Godstone Road and has a PTAL of 2.
- 8.63 The London Plan (2021) requires that the maximum parking standards for a PTAL 2 in outer London for 3+ bedroom homes should be up to 1 space per dwelling and or 2-bedroom dwellings, the maximum should be up to 0.75 spaces per dwelling. This therefore equates to a maximum of 7 parking spaces for the proposed 8 homes. The scheme would deliver 8 car parking spaces across the site.
- 8.64 Whilst the parking provision would exceed the maximum parking standards by a space, the policy does state that boroughs should consider standards that allow for a higher level of parking provision where there is evidence that this would support additional family housing. In this case, it is noted that there is no parking available on Welcomes Road (due

to the width of the road), therefore visitors would need to park on Kenley Lane or on the site. The proposals would deliver a 1:1 parking provision across the site, on this occasion the proposals are acceptable and whilst the parking provision would exceed London Plan Policy T6, given the proposed unit mix and the higher provision encouraged by the London Plan for family dwellings, on balance the proposals are considered to be acceptable as there would be minimal harm caused to the existing highways network as a result of the additional spaces.

- 8.65 The proposed vehicular crossover would be 4.5m in width with 0.5m ramps either side. This would comply with the council's crossover guidance. It would incorporate a shared vehicular access and a 1.2m wide pedestrian route (demarked using a different surface treatment). Visibility splays are also achieved out of the site with vehicles able to enter and exit the site in forward gear. Tracking diagrams have been provided and demonstrate that vehicles would be able to safely move around the site as would larger vehicles that may be on site for servicing purposes. A segregated pedestrian route would be marked out on the shared surface which would offer pedestrians a safe route to the front and the rear of the site.
- 8.66 A condition is recommended to ensure the delivery of 20% active vehicle charging points would be provided in line with policy DM30 and Policy T6.1 of the London Plan. The appropriate pedestrian and vehicular sightlines are shown on the site plan.
- 8.67 A supporting statement has reviewed the cumulative impact of parking on committed developments within the area and has noted that the impact on the wider highways network would be negligible however, the applicant has confirmed agreement to a S.106 agreement to secure a contribution towards sustainable transport initiatives in line with Policy SP8.12 and SP8.13. It is recommended that a financial contribution of £1500 per unit is secured towards sustainable transport improvement measures including contributions towards car clubs and electric vehicle charging infrastructure as required by Local Plan Policy DM30(e) and SP8.13.

#### Cycle storage

- 8.68 Cycle stores are shown to the side of the apartment block and externally outside of the proposed dwellings to the rear of the site. The site plan shows that the cycle stores would be lockable and provide space for 18 horizontal cycles (16 in the apartment store and 2 to the dwellings at the rear of the site). Two bike spaces are required per house. It is considered the access path would be wide enough (at least 1.2m wide) for bikes to be taken along the side access to the front and allows wider and adaptable bikes to be able to access the store.
- 8.69 The provision of spaces and the locations of the stores result in a development that complies with London Plan Policy T5 and the London Cycle Design Standards as referenced to, by the policy.
- 8.70 Full details relating to the appearance of the cycle stores and design of cycle stands would be secured by a suitably worded condition.

## Refuse

- 8.71 Policy DM13 of the Croydon Local Plan (2018) states refuse/recycling should be sensitively integrated within the building, ensure facilities are well screened, provide adequate space for temporary storage of waste (including bulky waste) materials generated by the development and provide layouts that ensure facilities are safe, conveniently located and easily accessible by occupants, operatives and their vehicles.
- 8.72 Policy DM13 requires the design of refuse and recycling facilities to be treated as an integral element of the overall design. The bin stores are located within the envelope of the apartment block and to the rear of the development site. These are of an appropriate size to accommodate the receptacles which would be required by the development and as set out within council guidance. Whilst the refuse stores at the front of the site would be an appropriate location for collection by operatives, they are more than the recommended 30m (at approximately 47m) walking distance from the furthest house. Bin stores are proposed for those homes which are within 30m of their entrances, but bins will need to be taken from those stores to the communal store at the front of the site for collection. The communal bin store is however on the way in and out of the site for the houses at the rear and is therefore conveniently located for dropping off waste on the way out, even if the distance exceeds the recommended 30m.
- 8.73 The location of bulky waste storage has also been provided within the site layout plan and is acceptable.
- 8.74 Overall, the development is considered to deliver facilities for the storage of waste that would comply with the objectives of Local Plan Policy DM13.

## Construction Logistics

- 8.75 It is recommended for a condition to be attached for a Construction Logistics Plan to be submitted (as a pre-commencement condition) and for an informative to be placed on the decision in respect of works being carried out in line with the Council's "Code of Practice on the Control of Noise and Pollution from Construction Sites."

## **F. FIRE SAFETY**

- 8.76 London Plan Policy D12 requires that development proposals should achieve the highest standards of fire safety at the earliest possible stage: *'In the interest of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of safety'*.
- 8.77 A fire safety statement has been prepared with the level of detail that is appropriate and reasonable to comply with Policy D12 Part A. The statement indicates that fire appliances can be located to the front of the property on Welcomes Road and a plan was providing showing fire exits and safe assembly points.
- 8.78 The buildings have been designed in such a way to minimise the spread of fire as outlined in the Fire Strategy Statement and measures such as fire doors and sprinklers will be designed into the development. A plan has also been provided that demonstrates how future occupiers would evacuate the building in the event of a fire. As the proposal is a major development, additional details are required to comply with Part B of Policy D12,

which are recommended to be secured by a planning condition given the scale of the development.

## **G. FLOOD RISK AND ENERGY EFFICIENCY**

- 8.79 Policy SI 12 and Policy SI 13 of the London Plan 2021 state that development proposals must comply with the flood risk assessment and management requirements NPPF and utilise sustainable urban drainage systems (SUDS). The London Plan 2021 states that current and expected flood risk from all sources should be managed in a sustainable way and that surface water management issues should be identified, and measures implemented to aim to reduce these risks. 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). The site falls within a critical drainage area. A SUDS Strategy has been submitted for consideration.
- 8.80 It is noted that as the site is underlain by chalk, which is considered suitable for proprietary infiltration drainage, it is proposed to discharge the surface water run off through a soakaway. Soakaways should be sited 10m from foundations so the location of the soakaway would be at the far end of the car park on the eastern boundary adjacent to Welcomes Road. It is also proposed to utilise permeable paving which will discharge surface water via pipes to the tank.
- 8.81 At this stage it has been demonstrate that the site would be capable of delivering a SUDS scheme that would be capable of discharging surface water run off in a sustainable way and line with London plan Policy SI13 and Local Plan Policy DM25.
- 8.82 It should be noted that the SUDs Report is a draft and does not show the layout of the updated version of the scheme (which has been reduced in size). It is however considered the details can adequately be secured via conditioned given the plan within the report is not that dissimilar to that proposed. It is therefore recommended for a SUDs condition to be attached for details to be submitted.

## **H. ENERGY EFFICIENCY AND WATER USAGE**

- 8.83 London Plan Policy SI2 requires major developments to be zero carbon by reducing greenhouse gas emissions in accordance with the energy hierarchy. An energy statement has been submitted stating that the scheme could achieve a 35% reduction in on-site regulated emissions (although it incorrectly explains that only a 19% reduction is required, it would achieve the policy requirement). It follows the London Plan energy hierarchy, outlining that individual heat pumps and mechanical ventilation heat recovery would be used, and solar photovoltaics would be positioned on the roof (13.86kWp). These measures would achieve a CO2 reduction of 35% and the remainder would be offset by way of a financial contribution to achieve zero carbon standards. The carbon offset contribution would be secured by S.106 legal agreement. The solar panels and heat pumps are not shown on the proposed elevations, so a condition is recommended securing details to avoid harm to amenity.
- 8.84 In order to ensure that the proposed development will be constructed to high standards of sustainable design in accordance with Local Plan policy SP6, a condition will be attached

requiring the proposed development to meet a minimum water efficiency standard of 110 litres/person/day as set out in Building Regulations Part G.

## **OTHER MATTERS**

- 8.85 A contribution towards air quality improvements to mitigate against non-road transport emissions is recommended to be secured via the S.106 legal agreement.
- 8.86 Croydon Local Plan Policy SP3.14 and planning policy including the adopted Section 106 Planning Obligations in Croydon and their Relationship to the Community Infrastructure Levy – Review 2017 sets out the Councils' approach to delivering local employment for development proposal. A financial contribution and an employment and skills strategy would be secured as part of the legal agreement.

## **9 CONCLUSION**

- 9.1 The provision of 8 new dwellings within the Borough is encouraged by the Council's Local Plan policies, national guidance in the NPPF and regional policies of the London Plan. The proposed new homes would add to the supply of family sized housing in the area, whilst respecting the local character. It would not result in unacceptable impacts in terms of highways, amenity, or environmental impacts, and would result in a sustainable form of development.
- 9.2 In addition, using legal agreement and appropriate conditions, the development would be acceptable.
- 9.3 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).