

1 APPLICATION DETAILS

Ref: 21/04380/FUL
 Location: 15 & R/O 17 Wattendon Road, Kenley, CR8 5LW
 Ward: Kenley
 Description: Partial demolition of integrated garages and extensions at 15 Wattendon Road to facilitate access for the erection of 8 new homes (4 pairs of semi-detached houses) in rear garden land of 15 & 17 Wattendon Road with access, parking & landscaping.
 Drawing Nos: PL001 Rev.00 (Site Location Plan), PL200 Rev.05 (Elevations from Wattendon Road), PL201 Rev.05 (Front Elevation 01), PL202 Rev.05 (Front Elevations 02) PL203 Rev.05 (Rear Elevation 01), PL204 Rev.05 (Rear Elevation 02), PL205 Rev.05 (Flank Elevation 01), PL206 Rev.05 (Flank Elevation 02), PL031 Rev.01 (Existing Cross Section 02), PL032 Rev.01 (Existing Land Sections 01), PL005 Rev.01 (Existing Site Plan and Survey), PL099 Rev.07 (Lower Ground Floor Plans), PL100 Rev.07 (Ground Floor Plans), PL101 Rev.07 (First Floor Plans), PL102 Rev.07 (Roof Plan and Levels), PL103 Rev.07 (Urban Greening Factor), PL300 Rev.05 (Proposed Land Sections)
 Applicant: Mantle Developments UK Ltd
 Case Officer: Joe Sales

	3 bed 4 person	4 bed 5 person	4 beds 6 person	Total
Proposed (all market housing)	3	3	2	8

Number of car parking spaces	Number of cycle parking spaces
12	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.
- 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

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 including footway survey.
4. Submission of Drainage Strategy/SUDS details.
5. Submission of a Construction Environment Management Plan and a Lighting Environmental Management Plan).
6. Details of vehicle crossover design
7. Details of making good of the extension to no.15 Wattendon Road.
8. Finished floor levels

Pre-Superstructure Conditions

9. Submission of details relating to external materials/details.

Pre-Occupation Conditions

10. Submission of hard and soft landscaping details including biodiversity net gain and maintenance plan.
11. Submission of site waste management plan for refuse collection.
12. Submission of cycle parking details.
13. Details of energy plant and equipment.

Compliance Conditions

14. Electric Vehicle Charging Points
15. Development to be carried out in accordance with the approved tree protection plan and arboricultural impact assessment.
16. Development to be carried out in accordance with the approved ecological surveys and reports.
17. Development to be carried out in accordance with accessible homes requirements M4(2) and M4(3).
18. Implementation of car parking as shown on plans with no boundary treatments above 0.6m in the sightlines.
19. Compliance with water efficiency requirements.
20. No additional side facing windows in dwelling houses.
21. Removal of permitted development rights in dwelling houses (including 15 Wattendon Road).
22. Compliance with Fire Safety Strategy

23. 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. Contact waste team prior to occupation.
 4. Highways informative in relation to s278 and s38 works required.
 5. Boilers.
 6. Construction Logistics Informative (in relation to condition 3)
 7. Compliance with Building/Fire Regulations.
 8. 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 site comprises the gardens of a pair of semi-detached houses at 15 and 17 Wattendon Road. The proposal is for the partial demolition of the existing dwelling at 15 Wattendon Road to accommodate a new access road to the rear of the site to accommodate the redevelopment of the existing rear garden area to provide 8 new dwellings.
- 3.2 The unit mix would comprise of 6 x 4-bedroom dwellings and 2 x 3-bedroom units (total 8 homes).
- 3.3 Access to the site is via Wattendon Road with parking provided across the site which accommodates 12 car parking spaces. In addition to this, it is proposed to re-provide the existing dwelling with two car parking spaces within a reconfigured front garden.
- 3.4 Each dwelling would be afforded private amenity spaces in the form of front and rear gardens.
- 3.5 Cycle and refuse stores are provided within and around the site.
- 3.6 Due to the change in land levels across the site, the dwellings would appear as two storeys (with low roof and eaves levels) when viewed from the front of the site, but some would be three storeys when viewed from the rear.



Figure 1-Proposed Development

Background

- 3.7 Amended plans and clarification details have been submitted as part of the application process. The resultant changes included a reconfiguration of the access road and the car parking layout. 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 application site comprises the rear gardens of 15-17 Wattendon Road. The existing dwellings are situated on the south-west side of Wattendon Road. The rear gardens sit adjacent to the properties that run along the southern boundary of the site at Steyning Close and Wood East of Haydn Avenue/Roffey Close which is located along the western boundary of the site.
- 3.9 At entry the level, the site is relatively flat however the site slopes down towards the south-west towards the rear of the site. The site is at very low risk of surface water flooding and whilst there are no policy designations directly associated with the application site, the woods to the west of the site are designated as metropolitan green belt and a site of nature conservation importance.
- 3.10 The site is subject to a tree preservation order which sits on the southern boundary of the site within 13 Wattendon Road ref. T2 No.22 1993.

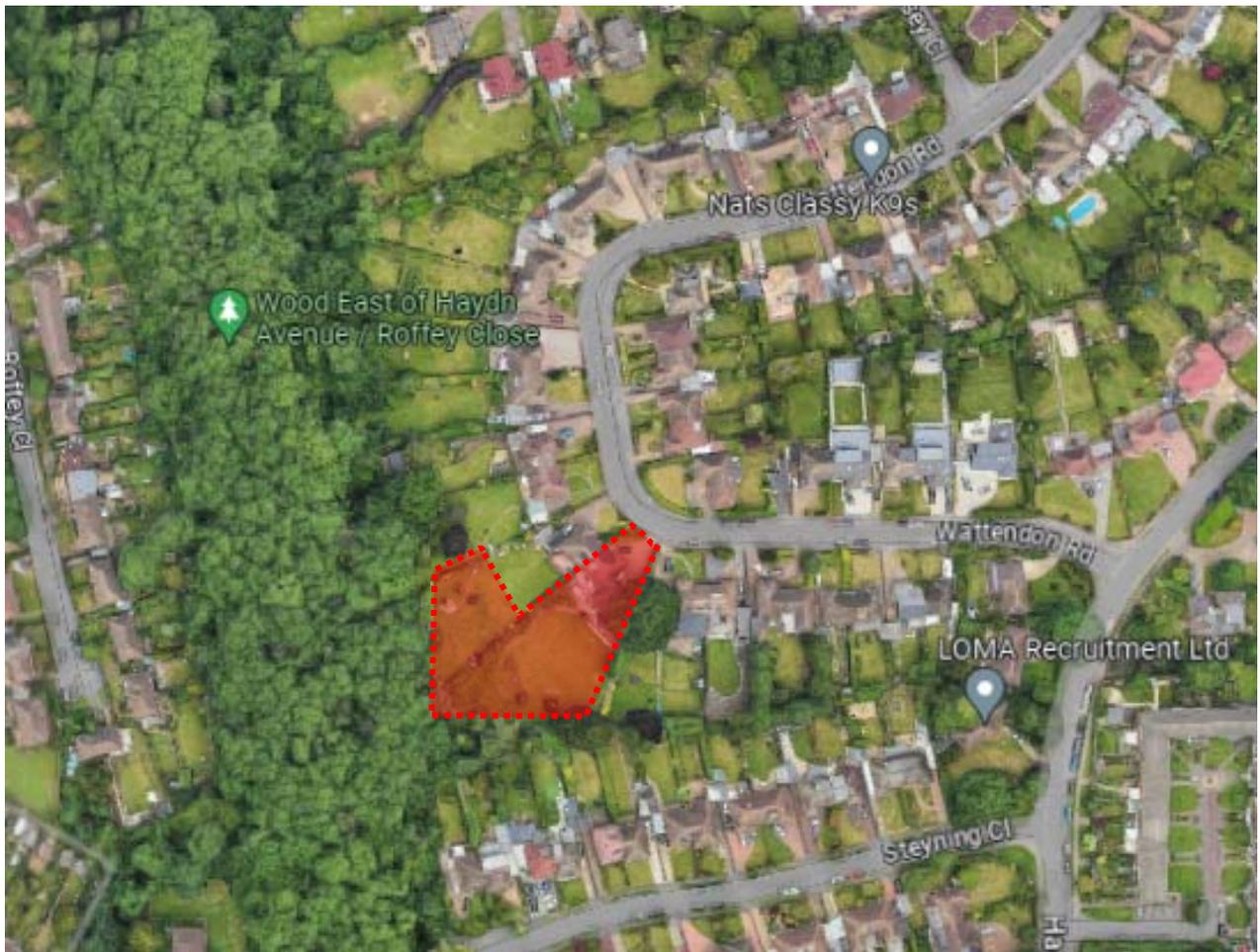


Figure 2-Aerial View of the Site

Planning History

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

15 Wattendon Road

- 94/00534/P- Erection of attached garage. (Permission granted 22/10/1994).

17 Wattendon Road

- None

15-17 Wattendon Road

- 21/02591/PRE – Pre-Application advice for: To erect eight, new semi-detached dwellings in the existing rear gardens of two houses. (Published Online. Advice provided in September 2021, prior to the revocation of the Croydon Suburban Design Guide in 2022).

4 SUMMARY OF KEY REASONS FOR RECOMMENDATION

4.1 Approval is recommended for the following reasons:

- The principle of residential development within this location is acceptable.
- 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.
- Subject to conditions, the proposals would offer sufficient biodiversity mitigation measures and would not have an adverse impact on ecology.

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 13 neighbouring properties were notified about the application and invited to comment. 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: 67
Objecting: 67
Supporting: 0

6.2 The following Councillors and MP submitted representations:

- Councillor Ola Kolade
- MP Chris Philp

6.3 In terms of the responses that were received, 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.

<u>Objection</u>	<u>Officer comment</u>
<i>Character and design</i>	
Overdevelopment of the site	Addressed in paragraphs 8.12-8.37.
Development is not in keeping with the surrounding bungalows.	
<i>Neighbouring amenity impacts</i>	
Overlooking and privacy concerns	Addressed in paragraphs 8.47-8.55.
Impact on daylight/sunlight/loss of light to gardens	
Noise	
<i>Parking and highways</i>	
Insufficient parking will lead to overspill parking on surrounding road.	Addressed in paragraphs 8.61-8.64.
Additional car parking would result in harm to the existing highways network.	Addressed in paragraphs 8.61-8.64.
<i>Other</i>	
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 8.77.
Impact on wildlife/biodiversity	Addressed in Paragraph 8.56-8.64.
Impact on trees	Addressed in Paragraph 8.56-8.64.
Increased flood risk.	Addressed in Paragraph 8.82-8.84.
Cumulative impact of development	A CIL contribution will be provided.
Restrictive covenant on site.	This is not a material planning consideration for this development proposal.

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

- Cramped form of development that would appear incongruous with the surrounding area.
- Impact on highways safety.
- Impact on biodiversity.
- Lack of consideration for local infrastructure.

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 20year 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).

Proposed New Homes

8.5 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.

8.6 Policy H2 of the London Plan seeks to encourage Boroughs to pro-actively support well-designed new homes on small sites (below 0.25 hectares in size). This should be achieved by significantly increasing the contribution of small sites, diversify the sources, locations, type and mix of housing supply. The policy also encourages that LPAs should recognise that local character evolves over time and will need to change in appropriate locations to accommodate additional housing on site.

8.7 London Plan Policy D3 encourages incremental densification to achieve a change in densities in the most appropriate way and Policy H2 seeks to significantly increase the contribution of small sites to meeting London's housing needs. Given the above, the principle of intensifying the residential use of the existing site is acceptable.

8.8 The development would be sited within the rear gardens of 15 and 17 Wattendon Road. Given that the existing properties, and their respective gardens, would be retained, the proposals would need to be considered against the requirements of Local Plan Policy DM10.4 which pursues that in the case of development in the grounds of an existing building which is retained, a minimum length of 10m and no less than half or 200m² (whichever is the smaller) of the existing garden area is retained for the host property, after the subdivision of the garden.

Address	Existing (sqm)	Retained (sqm)	Length Retained
15 Wattendon Road	1809	245	22m
17 Wattendon Road	1391	448	22m

Table 1-Existing and Retained Garden Areas

8.9 As the above table demonstrates, each dwelling would be left with an amount of private amenity space more than 200sqm as required by the policy. Furthermore, the length of the retained garden areas which would be around 22m, would also comply with the policy requirement that a minimum 10m length is retained.

8.10 Given that the development proposals would be considered as small site as defined by Policy H2 of the London Plan and that they would comply with the requirements of Local Plan Policy DM10.4, the use of the site for residential purposes and redevelopment would be acceptable and therefore the principle of redeveloping the site for residential purposes is acceptable in land use terms.

Affordable Housing

- 8.11 The proposed scheme on the site for 8 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

- 8.12 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.
- 8.13 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.

Height, scale, siting

- 8.14 Local Plan Policy DM10 does support rear garden development where an existing building is retained with a relatively large garden. However, the policy also requires development to respect existing development patterns, layout, and siting and where an existing building is retained, development shall be subservient to that building.
- 8.15 The proposal would retain the existing houses at 15 and Wattendon Road, with no 15's side extension (garage) being partly demolished to allow access. The impact on no.15 would be acceptable, with the retained part of the extension remaining visually subordinate to the original house. Details of the materials and detailing used for the making-good of the building following demolition, are recommended to be secured by a "pre-demolition" planning condition.
- 8.16 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. Wattendon Road is a curved suburban street of low-rise houses, which gives access to a cul-de-sac of 7 homes (Chertsey Close). There are several small clusters of infill homes or cul-de-sacs nearby, including The Firs (off Firs Road) and Steyning Close (which backs onto the site). The proposals are set back from the existing dwellings on Wattendon Road arranged as a small cul-de-sac of 8 homes, along a curved access drive, and would be read as an extension to the existing housing estate. Homes in the area are generally set behind access drives or roads, with individual houses sitting behind parking spaces and/or soft landscaped front gardens. The proposed site layout would echo this, with the new homes fronting the access drive, and sitting behind front gardens and parking spaces. The surrounding homes are mostly semi-detached pairs of varying design including asymmetrical and symmetrical (or previously symmetrical but since extended/altered) pairs. The proposal would also echo this by proposing 4 pairs of semi-detached houses separated by substantial, 3-7m wide gaps.

- 8.17 Local Plan Policy DM10.1 requires development to aim to achieve a minimum of 3 storeys, but also explains that in the case of development within the rear garden of an existing building which is retained, development shall be subservient to that building. There is no Local Plan definition of subservient also paragraph 6.58 explains that these should be “subservient in scale.”
- 8.18 The site slopes to the rear, with a level change of approximately 6m. The buildings would sit at lower ground compared to the existing house on the site and would follow the slope of the land. The access to the site would remain at its natural land level, with limited excavation at various points throughout the site. The proposed level changes are generally no more than 60cm, although there would be a 1.5m high retaining wall between two of the proposed homes. This would be within the site, and no retaining walls are proposed along the site boundaries (such that neighbours would be affected). There is also a 2.3-7m wide buffer zone between the new gardens and the woodland to the rear.
- 8.19 The height of the development across the site comprises two full floors when viewed from the front of the site with examples of a lower ground floor level on some of the proposed dwellings. This would achieve 3-storeys in total and would be compliant with the policy objectives. Furthermore, the houses would be integrated into the landscape by the lower ground levels following the natural slope of the land. This would partially achieve 3-storeys in total and would be compliant with the policy objectives. This approach works with the sloped topography rather than introducing lightwells or other highly engineered design features. This would retain the verdant nature of the site.
- 8.20 In terms of balancing this against the requirement that development shall be subservient to the existing buildings retained, due to the land levels across the site, the proposed development would not exceed the height of the existing properties on Wattendon Road. The site slopes to the rear, such that the ground levels would be lower than the existing houses on Wattendon road. The first floor would also be partially set within the roof spaces (with the eaves being lower than the window heads), to minimise the heights.
- 8.21 The low ridge heights would ensure that the existing bungalows would remain the prominent buildings when viewed from the existing street resulting in the development achieving a suitable level of subservience. The proposed height of the development would result in a subservience that would respect the local character, therefore complying with the aims and objectives of the guidance.
- 8.22 The footprints of the new houses would also be smaller than the existing bungalow, such that the ridge height and footprint of each house considered together would result in them being subservient.
- 8.23 The London Housing Design Guide recommends that buildings should provide around an 18m to 21m separation distance between facing properties. 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 Wattendon Road, a minimum separation distance of 19-21m would be provided at an angle, between the extension of the existing dwelling and the nearest proposed (southernmost) dwellings to the rear of the site. The separation distance from the other proposed houses would all be at least 33m. The proposed arrangement is therefore consistent with the relevant guidance.

8.24 The development offers generous separation distances to the existing buildings on Wattendon Road, and the proposed built form would comprise of blocks that are broken up in form to respect the existing development pattern in terms of the separation distance between buildings. The breaking up of the massing to the built form also assists in achieving a level of acceptable subservience given that this would ensure that the existing suburban character of the area would be retained.



Figure 3-Proposed Site Plan

8.25 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.

8.26 The thrust of Local Plan Policy DM10.4 seeks to retain the existing suburban character of areas where backland development is proposed within the existing rear gardens of buildings. 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 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. For major applications, the London Plan sets out a requirement for “urban greening,” with a target Urban Greening Factor (UGF) of 0.4. The proposed landscaping plan explains how a UGF of 0.56 will be achieved, which exceeds the target and is acceptable. A detailed landscaping plan (including maintenance) is required by a planning condition, and details of lighting are also required by a condition to balance the need for lighting with the requirement to avoid light pollution (also see TREES, LANDSCAPING AND BIODIVERSITY).

8.27 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

8.28 The design principles of the dwellings have been drawn from the contextual character analysis to provide an asymmetrical roof form when viewed from the street scene within the site. Whilst it is noted that Wattendon Road comprises of detached and semi-detached bungalows which are uniform in the appearance and use of materials, the wider context of the area has been reviewed to inform the design of the proposed development.

8.29 The proposed development would not be very visible from Wattendon Road, with only glimpse views. Therefore, whilst the design draws upon the features of the nearby dwellings, there is a reduced need for it to closely respect the street scene of Wattendon Road, and instead it is appropriate for the development to have its own character which respects the local distinctiveness of the wider surroundings. The resultant gabled frontages would give the appearance of four detached dwellings. The use of an asymmetrical gable would also provide a feature that breaks up the massing of the front elevations whilst also providing visual interest to the appearance of the development. Local Plan Policy DM10.7 states that development proposals should contribute positively to the character of the area and is sympathetic with its context. Whilst the immediate area is uniform in style and comprises of hipped roofs, examples of varying roof forms are demonstrated in neighbouring streets such as Firs Road, Hayes Lane, and Park Road. The proposed roof form is sympathetic to the traditional forms which would sit comfortably when viewed against the local context, therefore complying with the aims and objectives of Policy DM10.7.

8.30 The proposed fenestration of the dwellings has taken on a more contemporary approach in terms of their sizes and formation on the front elevation of the dwelling. Whilst this would depart slightly from the existing character of the area, given that the dwellings would be set back from the street scene, the proposed arrangement is not considered to harm the appearance area or the visual amenities. The proposals provide a complimentary fenestration design which works well in conjunction with the proportions of brick and hung tile present on the front elevations which would be consistent with the appearance of the existing dwellings within the area.

8.31 The elevation of the building is broken up using varying materials for the external features of the building. A red, brown, yellow stock brick and brown hanging tiles are proposed to the front elevations of the buildings. The change in materials provides a contrast between the main elevation and catslide roof and the setback element of the buildings. This emphasises the main front feature whilst also breaking up the massing of the built form. A brown tile would be used for the roof of the dwellings and the proposed material choice ensures that the development is sympathetic with the surrounding area in terms of the traditional style of architecture such as clay tiles and brickwork external finishes.



Figure 4-Sectional Elevations (Front)

- 8.32 It is proposed to use UPVC windows. 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.
- 8.33 Overall, it is considered that development would respond to the architectural styles and features that contribute to the character of the area. The proposals are therefore considered to result in a development that complies with Local Plan Policy DM10.

Alterations to the dwelling at 15 Wattendon Road

- 8.34 The alterations to the existing dwelling result in the partial demolition of the existing side extension to accommodate the proposed access road. Furthermore, the proposed access route would alter the arrangement to the existing driveway of the dwelling.
- 8.35 Overall, the alterations to the existing dwelling would be minor and would not unacceptably alter the appearance or the character of the dwelling when viewed from the street scene which would ensure that the development respects the character of the existing area.
- 8.36 Furthermore, the reconfiguration of the front drive would not result in harm to the character or the appearance of the area. The front driveway would be partially retained and grassed areas would be provided which is consistent feature that contributes to the character of the existing area.
- 8.37 Overall, the alterations to the existing dwelling would result in minimal harm to the appearance of the dwelling and would therefore respect the visual amenities of the street scene and the character of the existing area which would be in compliance with Local Plan Policy DM10.

B. QUALITY OF RESIDENTIAL ACCOMMODATION

8.38 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.

8.39 The proposed unit mix comprises 5 x 4-bedroom units and 3 x 3-bedroom units. The proposed unit mix would deliver an amount of 100% family units across the development site. The development would provide a contribution to the council's strategic target, and it is considered that the proposed unit mix would therefore be acceptable.

8.40 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 Required (sqm)	Amenity Space Proposed (sqm)	Min. Amenity Space Required (sqm)	Built-in Storage Space Proposed (sqm)	Built in Storage Space Required (sqm)
1	3b/4p	300	100	94	7	4.3	3
2	3b/4p	300	100	91	7	4.3	3
3	3b/4p	300	100	54	7	4.3	2
4	4b/6p	300	150	180	9	4.3	4
5	4b/6p	300	150	286	9	4.3	2
6	4b/5p	390	130	102	8	4.3	2
7	4b/5p	390	130	87	8	4.3	2
8	4b/5p	390	130	107	8	4.3	2

Scheme considered against London Plan Policy D6 and Table 3.1

8.41 It is proposed to provide 3 x 3 bedroom (4 person), 3 x 4 bedroom (5 person) and 2 x 4 bedroom (6 person). The table above demonstrates that the proposed development would comply with the minimum space standards set out within the London Plan and that enough private amenity space and built in storage would be provided. On that basis, the proposals are considered to provide a suitable quality of accommodation in terms of the size of the units proposed.

- 8.42 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 proposed buildings, sufficient light and outlook would be provided with all homes being dual aspect. Ceiling heights should be at least 2.5m; a section has been provided which shown floor-floor heights of 3m which will allow this. A condition is recommended requiring finished floor levels (to achieve visual subservience, but also to demonstrate that this standard will be met).
- 8.43 Good design promotes quality of life for the occupants and users of buildings. This includes function, buildings should be easy to use. It also includes comfort, safety and security. Amenity, privacy accessibility and adaptability. The development has been designed to provide accessible housing. All the units would be capable of meeting the M4(2) ('accessible and adaptable' units) building regulation requirement, set by London Plan Policy D7, as all of the houses would have level threshold access.
- 8.44 The London Housing SPG states that a minimum of 5 m² 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. In terms of the private amenity space provision, the dwellings would each have access to a rear garden which exceeds the required standards.
- 8.45 The proposal includes an access drive which would be visible from the new homes, with good passive surveillance. A condition is recommended requiring details of lighting. These design measures will ensure that the proposal creates a suitably safe environment and avoids creating opportunities for crime.
- 8.46 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

- 8.47 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.
- 8.48 The properties with the potential to be most affected are the host properties at 15 and 17 Wattendon Road, the adjoining properties at 13 and 19 Wattendon Road and the properties sited and adjoined to the rear of the site at 20-28 Steyning Close.

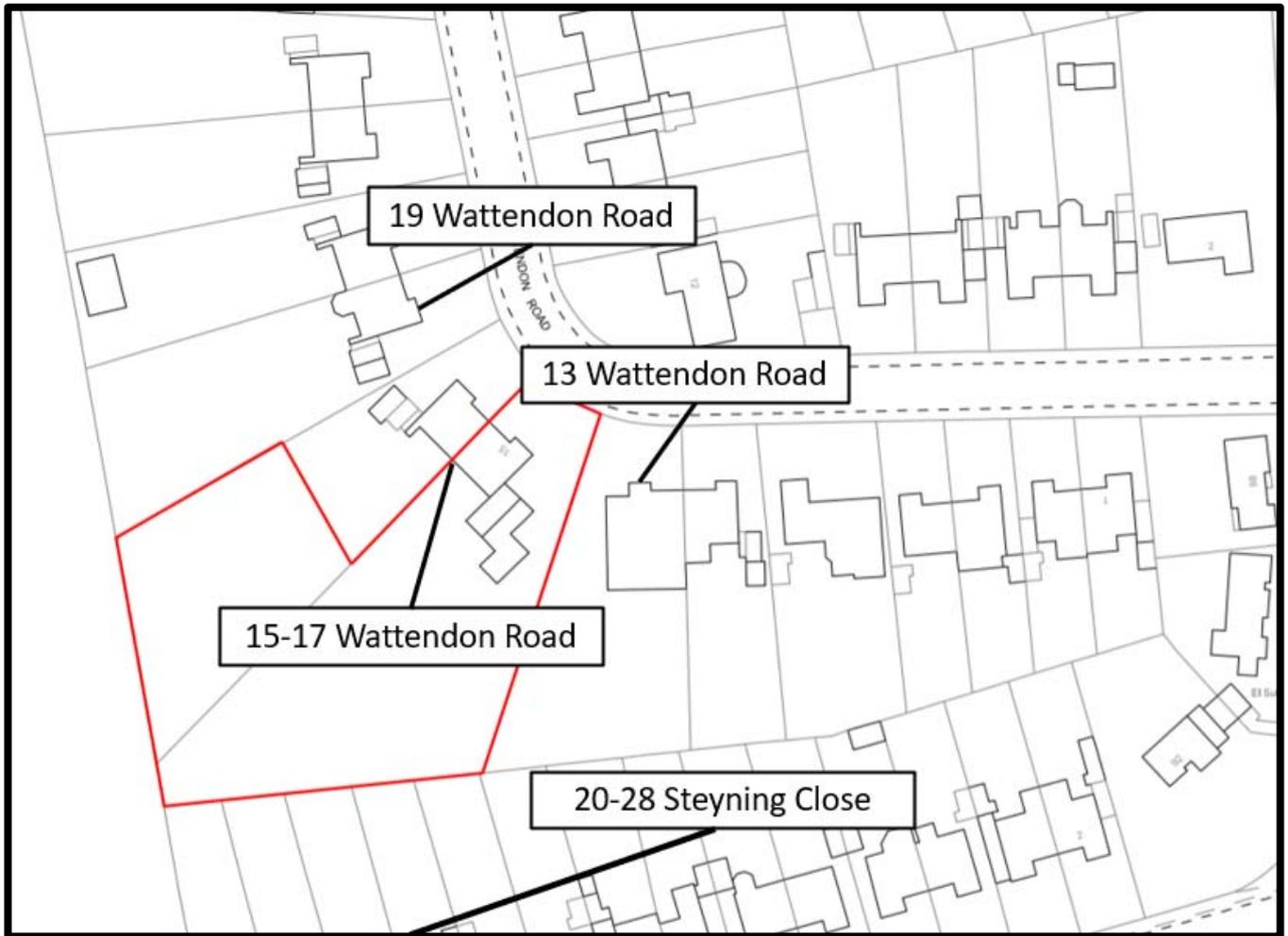


Figure 5-Neighbouring Dwellings

15 and 17 Wattendon Road (host dwellings)

8.49 The proposals would offer separation distances in excess of 19m between the proposed and existing dwellings on Wattendon Road. Furthermore, the proposed height of the development would be equal to or lower than the existing dwellings along the street due to the change in land levels. Given this relationship, it is considered that the proposals would comply with the aims and objectives of Local Plan Policy DM10.6 which recommends that separation distance of 18m-21m.

13 and 19 Wattendon Road (immediate adjoining neighbours)

8.50 These dwellings are situated immediately adjacent to either side of the host dwellings. Furthermore, the development would be sited around 20m from the nearest point of the rear elevation of number 13 Wattendon Road, and the nearest proposed dwelling located to the eastern boundary. In terms of the relationship to 19 Wattendon Road, the nearest dwelling would be sited 30m from the nearest point on the rear elevation of the neighbouring dwelling. A back to front relationship is proposed and the separation distances provided would comply with the Local Plan recommendation that a distance of 18m-21m is given between buildings. Furthermore, both existing neighbouring properties are orientated in such a way which results in them facing away from the development site minimising the impact to the outlook and the amenity of the adjoining occupiers.

20-28 Steyning Close

- 8.51 Steyning Close adjoins the rear eastern boundary of the site. The proposed relationship would comprise a back-to-back relationship, albeit their orientation would face slightly away from one another. The development would offer separation distance to the nearest rear elevation of Steyning Close of around 34m. This would provide an acceptable separation distance between the existing and proposed dwellings which would result in a relationship that mitigates the impacts of the proposed development on the neighbouring outlook, amenity and privacy. Given the separation distance and the angled orientation, the proposed development would also avoid directly overlooking the first 10m of the gardens of the homes at Steyning Close.
- 8.52 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 Wattendon Road and Steyning Close.

Other Amenity Impacts

- 8.53 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.
- 8.54 The proposed development would be served by a driveway which runs alongside the boundary with no.13 Wattendon Road. Consideration has been given to potential disturbance by headlights from vehicles exiting (or manoeuvring within) the site. Given the orientation of the driveway, it would not result in headlights directly facing the windows of no.13 and given that the land slopes down into the site, glare from vehicle headlights would be obstructed by the boundary treatment between the properties.
- 8.55 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

- 8.56 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.
- 8.57 A Tree Preservation Order is present on the site which protects the Turkey Oak tree which sits on the boundary between 13 and 15 Wattendon Road. The tree itself is rooted within

13 Wattendon Road, but its canopy and root protection area extend into the site. The submitted arboricultural impact assessment has recommended construction measures that would mitigate the impacts to the tree. It is proposed to construct a suspended driveway using a concrete slab base which is supported by micro piles with a clay board used to form a void between ground level and the underside of the new slab.

- 8.58 The Arboricultural Impact Assessment has also proposed a sequence of works to ensure that the driveway is constructed prior to construction of the development to the rear of the site. This would ensure that the tree protection measures are in place from the outset of development and that minimal harm would arise to the tree in relation to pre and post construction pressures.
- 8.59 The development includes the removal of 1 ash tree located to the rear of the site and the retention of 5. The submitted survey has demonstrated that the tree proposed for removal is in poor condition and that the development offers the 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 10 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 at a suitable level of maturity to compensate for the loss of the existing.
- 8.60 Overall, it is considered that the proposed development would avoid unacceptable harm to the protected tree and the proposed landscaping would mitigate the loss of the ash tree. The development is therefore considered to comply with the aims and objectives of Local Plan Policy DM10.8 and DM28

Biodiversity

- 8.61 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).
- 8.62 Protected species are a material planning consideration. A Preliminary Ecological Appraisal has been submitted as well as additional ecological comments. Due to the location of the SINC to the rear of the site, it is proposed to include a buffer zone (2.3-7.9m wide) to provide some ecological relief between the development site and the existing SINC and woodland. The proposed measures have been assessed by the Councils' ecological assessor who has raised no objection subject to securing conditions relating to a construction environmental management plan, sensitive lighting and biodiversity mitigation and enhancement measures.
- 8.63 The proposed headline biodiversity enhancements as set out within the PEA are supported, and would secure measurable net gains for biodiversity, as outlined under Paragraph 174d of the National Planning Policy Framework (2021).
- 8.64 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

Access arrangements

- 8.65 The site has a Public Transport Accessibility Level (PTAL) of 0 which indicates very poor access to public transport. Kenley station is 1.2km (14-minute walk) from the site. The station offers regular commuter services to town centres, stations and workplaces and are useful for regular journeys, but residents are not likely to be able to wholly depend on this public service and part of the journey does not have pavements.
- 8.66 There is an existing vehicle crossover on the south side of the site, closest to number 13. The Council's transport planning officer raised concerns about the potential for the existing crossover to be made wider, as it already exceeds the Council's guidance. The proposal is to replace this crossover to create the new access road. The new access point would be 4m wide, 1.5m away from the neighbouring crossover, to reduce the width of a continuous crossover across the two sites. The width of the road would allow for a waiting space within the site if two vehicles were to meet whilst entering and exiting the site. The proposed width and location of the crossover complies with highways guidance and would be agreed as part of a S278 agreement. The Council's transport planning officer has explained that this arrangement is satisfactory, subject to detailed design (which is recommended by a pre-commencement condition). A 1.2m wide pedestrian path would also be delineated alongside the vehicle access.
- 8.67 Vehicle and pedestrian sightlines would be achieved and are shown on the site plan to the required standards. A condition will be attached to ensure that planting in the sightlines remains below 0.6m in height.
- 8.68 The parking retained for the existing dwelling at 15 Wattendon Road would utilise the same access with their spaces allocated off the new access road onto the new reconfigured front drive. There would be sufficient visibility for vehicles to manoeuvre safely given the openness of this section of site. Swept path diagrams have been provided for cars and larger (refuse collection) vehicles.

Car parking

- 8.69 London Plan policy T6.1 would permit up to 1.5 spaces per 3+ bed unit which equates to a maximum of 12 spaces. 12 spaces are proposed on site with two of these being allocated as visitor parking. It is unlikely therefore that the development would lead to overspill car parking.
- 8.70 The tracking diagrams confirm that manoeuvring into and out of the parking spaces can be achieved safely and a turning head is provided for larger vehicles servicing the site. Electric vehicle charging points could be achieved on the site and a condition has been recommended to ensure that at least 20% active and 80% passive points are provided in line with policy DM30 and London Plan Policy T6.1.
- 8.71 A financial contribution of £12,000 will be secured via S106 agreement to contribute towards sustainable transport initiatives in the local area in line with Local Plan policies SP8.12 and SP8.13. These include matters such as the delivery of electric vehicle charging infrastructure and car club spaces to support sustainable transport in the borough (as required by Policy DM SP8.13).

8.72 A condition will be attached to require 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

8.73 Policy DM30 and London Plan Policy T5 would require provision of a total of 16 cycle parking spaces (6 for the houses and 9 for the flats) plus 2 visitor spaces. Each of the houses have their own cycle storage enclosures in the rear garden (with external access) which is acceptable and in line with London Plan Policy T5.

8.74 Visitor cycle parking is shown on adjacent to the visitor car parking spaces. (1 Sheffield stand providing space for 2 bikes). A condition is recommended requiring details of how cycle storage will be provided, including how cycles for families and those with accessibility requirements will be accommodated.

Waste / Recycling Facilities

8.75 Policy DM13 requires the design of refuse and recycling facilities to be treated as an integral element of the overall design. The refuse stores for the units are sited to the front of each individual dwelling which would be within an accessible location for operatives to collect. These would be an adequate size for 3 bins required for recycling, general waste and food waste and there would be sufficient space within the site for the temporary storage and collection of bulky waste items.

8.76 A condition will be attached requiring submission of final details of the bin enclosures and bin sizes including materials, and green roofs as described above in the ecology section. The proposed homes have front gardens and driveways with space for bulky goods to be left for collection to avoid fly-tipping, however the plans are not detailed so a waste management plan is recommended by a planning condition to demonstrate how the bin enclosures and bulky goods areas will be provide in a manner which is accessible for waste collection operatives and maintains the visual amenity of the proposal.

Construction Logistics

8.77 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

8.78 London Plan Policy D12 required 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'*.

8.79 A fire safety statement has been prepared with the level of detail that is appropriate and reasonable to the scale of development. The statement indicates that fire appliances can access the site.

- 8.80 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.
- 8.81 The proposed development will ensure that there will be viable access for firefighting equipment appropriate for the size of development. It is considered that the statement that has been submitted is sufficient to fulfil the requirements of D12.

G. FLOOD RISK AND ENERGY EFFICIENCY

- 8.82 Policy SI 12 and Policy SI 13 of the London Plan 2021 seeks 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 seeks 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 does not fall within an area that is at risk of flooding and a flood risk assessment has been submitted which confirms this position.
- 8.83 It is proposed to discharge the surface water run off using permeable paving and a soakaway which would be sited 5m from the proposals. Soakaways should be sited 10m from foundations so the location of the soakaway. It is also proposed to provide rainwater harvesting in the form of water butts which are attached to the dwellings.
- 8.84 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. Whilst the details at this stage are limited, it is considered the details can adequately be secured via conditioned. It is therefore recommended for a SUDs condition to be attached for details to be submitted.

H. ENERGY EFFICIENCY AND WATER USAGE

- 8.85 In order to ensure that the proposed development will be constructed to high standards of sustainable design in accordance with Local Plan Policy SP6, an informative will be attached requiring details of external energy generation plant needed to achieve the carbon savings set out in the Building Regulations Part L (2021), and meet a minimum water efficiency standard of 110 litres/person/day as set out in Building Regulations Part G.

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).