

1.0 SUMMARY OF APPLICATION DETAILS

Ref: 20/00168/OUT
 Location: Coombe Bank 6 Church Road Kenley CR8 5DU
 Ward: Kenley
 Description: Outline planning permission for the demolition of existing dwellinghouse and erection of a part three; part four storey (including excavation) building comprising 9 self-contained flats (6x2 bed and 3x 3 bed); car parking; cycle and refuse provision; hard and soft landscaping; amenity space and external alterations (Access, Appearance, Layout and Scale only) (Amendments to the scheme to include fenestration, massing and external alterations).
 Drawing Nos: 01, 03, pl 20-516-01, pl 20-516-02, pl 20-516-03, , pl 20-516-04 Rev D, pl 20-516-06 Rev B, pl 20-516-07 Rev B, pl 20-516-08 Rev B, pl 20-516-09 Rev B, pl 20-516-10 Rev B, pl 20-516-11 Rev D, pl 20-516-12 Rev D, pl 20-516-13 Rev D, pl 20-516-14 Rev D, pl 20-516-15 Rev D, pl 20-516-16 Rev D, pl 20-516-17 Rev D, pl 20-516-18 Rev A, pl 20-516-19, Tree Protection Plan (19-748-TPP-B), Tree Constraints Plan (19-748-TCP), Landscape Strategy (0287/20/B/1), Arboricultural Impact Assessment Revision B dated March 2020, Addendum Character Appraisal (20-516-CA1) dated 25/03/2020, Highways Technical Note 1 dated 26/03/2020, Surface Water Drainage Note, Energy Statement, Planning, Design and Access Statement, Bat Survey Report dated 06/09/2019, Preliminary Ecological Appraisal dated 16/01/2019
 Applicant: Chartwell Property Group Ltd
 Agent: N/A
 Case Officer: Jimill Patel

	2 bed	3 bed	4 bed
Existing			1
Proposed	6	3	

All units are proposed for private sale

Number of car parking spaces	Number of cycle parking spaces
9	18

1.1 This application is being reported to Planning Committee because the Ward Councillor (Councillor O’Connell) has made a representation in accordance with the Committee Consideration Criteria and requested Committee consideration and objections above the threshold in the Committee Consideration Criteria have been received.

2.0 RECOMMENDATION

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

- a) A financial contribution of £13,500 towards highway management measures and the delivery of sustainable transport initiatives in Kenley
- b) And any other planning obligations considered necessary

2.2 That the Director of Planning and Strategic Transport has delegated authority to negotiate the legal agreement indicated above.

2.3 That the Director of Planning and Strategic Transport has delegated authority to issue the planning permission and impose conditions and informatives to secure the following matters:

Conditions

1. Development begun no later than two years from the final approval of reserved matters
2. Development to be carried out in accordance with the approved drawings and reports except where specified by conditions
3. Approval of reserved matters (landscaping) prior to any development on site
4. Landscape maintenance strategy and schedule to be submitted prior to occupation
5. Application for approval of reserved matters to be made within 3 years of date of permission
6. Tree replanting scheme
7. Strict accordance with Arboricultural Impact Assessment, constraints plan and tree protection plan including tree protection measures and no excavation zones
8. Construction Logistics Plan to be submitted prior to any development on site
9. All mitigation and enhancement measures and/or works shall be carried out in accordance with the details contained in the Preliminary Ecological Appraisal (Greenspace Ecological Solutions, January 2019) and the Bat Survey Report (Arbeco, June 2019).
10. No works including demolition of building until a licence or statement issued by Natural England about habitats and Species
11. Biodiversity enhancement strategy to be submitted prior to any above ground works
12. A Lighting design scheme for biodiversity
13. Submission of the following to be approved and thereafter retained: Cycle and refuse storage, boundary treatments and enclosures, retaining walls, disabled parking space, EVCP (including spec and passive provision), external lighting
14. Details of electric vehicle charging points to be submitted
15. Delivery and Servicing Plan to be submitted
16. Details of materials including samples prior to above ground works
17. No windows other than as shown
18. Windows in northern elevation to be obscurely glazed and non-opening
19. Amenity/Play/Communal space details prior to occupation
20. No works to trees undertaken during February and August - bird nesting season
21. Step free access to all dwellings provided and retained
22. Permeable forecourt material (forming part of SUDs scheme)
23. Accesses, finished floor levels provided as specified
24. No obstruction within visibility splays
25. Waste management strategy
26. Reinstatement of raised kerbs and verge where necessary and provision of new dropped crossing prior to occupation
27. Air Handling Units/Machinery

28. CO2 reduction including submission of detailed energy report
29. 110litre Water usage
30. In accordance with Drainage Strategy
31. Any other planning condition(s) considered necessary by the Director of Planning and Strategic Transport

Informatives

- 1) Policies
- 2) Granted subject to a Section 106 agreement
- 3) Consents may be required to reinstate the crossing point
- 4) Community Infrastructure Levy
- 5) Code of practise for Construction Sites
- 6) Insulation
- 7) Thames Water
- 8) Light pollution
- 9) Ecology
- 10) Requirement for ultra-low NOx boilers
- 11) Wildlife and Countryside Act of 1981
- 12) The Landscape Strategy (0287/20/B/1) is purely for indicative purposes and will be considered fully at reserved matter stage.
- 13) Any other informative(s) considered necessary by the Director of Planning and Strategic Transport

- 2.4 That the Committee confirms that adequate provision has been made by the imposition of conditions, for the preservation or planting of trees as required by Section 197 of the Town and Country Planning Act 1990.
- 2.5 That if by 21st August 2020 the legal agreement has not been completed, the Director of Planning and Strategic Transport is delegated authority to refuse planning permission.

3.0 PROPOSAL AND LOCATION DETAILS

3.1 Outline planning permission is sought for the following:

- Demolition of the existing 4 bedroom detached dwellinghouse and garage
- Erection of a part three; part four storey building (including excavation) comprising 9 self-contained flats (6x2 bed and 3x3 bed)
- New crossover and access drive with parking to the rear
- Integrated cycle and refuse provision
- Hard and soft landscaping
- Communal/amenity/play space

3.2 Matters for consideration as part of this outline application are:

- Access
- Appearance
- Layout
- Scale

Landscaping is a reserved matter for approval at a later date although indicatively shown on the plans.

3.3 During the course of the application amended plans have been received. Local residents were re-notified of the amended proposals. The main alterations to the scheme have been as follows:

- Reduction and alteration to scale, massing and form of the building and amended design approach
- New side dormer addition to front middle gable
- Front and rear gables now symmetrical
- Alterations to roof formation to the side and rear including reduction
- Removal of rear dormer
- Removal and replacement rooflights and general external alterations

Site and Surroundings



Figure 1 Site Location Plan

- 3.4 The application site comprises a two storey detached dwellinghouse within a relatively wide and deep plot on the northern side of Church Road, in Kenley. The area is predominantly residential in character which comprises large detached dwellings, some of which are single or two-storeys.
- 3.5 The surrounding properties vary in their shape, size and appearances with no uniformity expressed. However, some of the properties have similar architectural features such as the front and rear gable projections, materiality and fenestration detailing. The adjacent property (8 Church Road) was granted planning permission - 17/01672/FUL and implemented for a replacement two storey dwelling. This building is contemporary in its materiality and overall design.
- 3.6 The host property has interesting architectural features such as the three front and rear symmetrical front gables, fenestration detailing and materiality. The site is well landscaped to the rear and contains an attractive strip of hedgerow along the front boundary. The forecourt and side of the property is hard surfaced which includes a detached garage along the northern boundary.
- 3.7 Land levels rise from north to south. There are a number of trees and shrubs on site, notably along the side (north) and rear (west) boundary, some of which are protected by a Tree Preservation Order (TPO 57 of 2008), which is discussed in more detail below.
- 3.8 Church Road is a private road and is single lane with no kerbside parking. Many parts of the road do not have pavements although there are grass verges to the front of the properties. It is noted that there is a pavement outside 8 Church Road. Kenley Railway Station is located 0.3 miles from the subject site. Bus stops are situated along Valley Road with access to surrounding towns. The Public Transport Accessibility Level (PTAL) is 2 which is poor.
- 3.9 The site falls within the Kenley Area of Focussed Intensification (AFI) and Croydon Panorama. The site falls within a surface water flood risk area, and a surface water critical drainage area.

Planning History

- 3.10 None of relevance.

4.0 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The principle of intensified residential development is considered to be acceptable given the location within the Kenley Area of Focussed Intensification and the national and local need for housing.
- The proposal would provide 9 residential units, including 3 x 3 bedroom family sized units.
- The massing, design and appearance of the development is appropriate, according with the thrust of guidance contained within the Suburban Housing Design SPD.
- The living conditions of adjacent occupiers would be protected from undue harm subject to conditions.
- The living standards of future occupiers are satisfactory (in terms of overall residential quality) and would comply with the Nationally Described Space Standard (NDSS).

- The level of parking and impact upon highway safety and efficiency would be acceptable subject to conditions.
- Satisfactory tree planting and soft landscaping would be provided to ensure the verdant setting is respected.
- Sustainability and environmental aspects of the development and ensuring their delivery can be controlled through planning conditions.

5.0 CONSULTATION RESPONSE

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

6.0 LOCAL REPRESENTATION

6.1 The application has been publicised by way of letters of notification to neighbouring properties in the vicinity of the application site. The number of representations received from neighbours in response to notification of the application (including a re-consultation on amended plans received) are as follows:

No of individual responses: Objecting: 105 Supporting: 0 Comment: 0

6.2 The following issues were raised in representations. Those that are material to the determination of the application, are addressed in substance in the MATERIAL PLANNING CONSIDERATIONS section of this report:

Objection	Officer comment
Character and Appearance	
Overdevelopment	Addressed in Sections 8.6-8.16 of this report.
Design – Out of keeping/obtrusive scale	Addressed in Sections 8.6-8.16 of this report. The design approach has been amended during the course of the application.
Overbearing	Addressed in Sections 8.6-8.16 of this report.
Too high	Addressed in Section 8.10-8.11 of this report.
Impact on amenities of neighbouring properties and future residents	
Loss of light to neighbouring properties	Addressed in Sections 8.31-8.45 of this report.
Overlooking and loss of privacy for neighbours	Addressed in Sections 8.31-8.45 of this report.
Noise disturbance including light pollution	Addressed in Sections 8.31-8.45 of this report. Conditions are recommended. This is a residential development and there is no evidence or reason to suggest

	that the proposal would result in undue pollution or noise that is not already associated with a residential area.
Lack of amenity space	Addressed in Sections 8.28 of this report. Each of the units would have private amenity space through an integrated/recessed terrace. The proposal would provide 150sqm of useable play/child/communal amenity space to the rear.
Transport and parking	
Inadequate parking provision	Addressed in Sections 8.46-8.54 of this report.
Health and Safety Risk from private road	<p>Addressed in Sections 8.46-8.54 of this report. The road is private and single lane and concerns from the public are acknowledged. However, the proposed access drive would provide satisfactory vehicle sightlines at the egress (which is to be conditioned). The access will be able to accommodate two vehicles passing each other without the need for vehicles to reverse onto the road.</p> <p>A number of areas along Church Road do not have pavements and rely on the grass verges. As part of the £13,500 contribution secured through a S106 agreement, this would help towards improvement of Kenley's Road and infrastructure.</p>
Construction traffic and disruption	A pre-commencement condition will be imposed requiring a Construction Logistics Plan to ensure construction activities do not cause undue disturbance to the highway network.
Too close to the junction and visibility would be poor	The siting of the crossover would be beyond the minimum 10 metre requirement to a junction. Furthermore, with visibility sightlines conditioned and shown within the submitted Highways Technical note, it is considered the arrangements would not adversely impact the highway and pedestrian conditions of the area.

Further parking stress from proposal	Addressed in Sections 8.46-8.54 of this report.
Pavements needed to improve access and safety	Addressed in Sections 8.46-8.54 of this report.
Biodiversity/Ecology	
Wildlife would be reduced	Addressed in Sections 8.17-8.23 of this report.
Loss of Trees	Addressed in Sections 8.17-8.23 of this report.
Flooding Matters	
Increase of flooding from proposal and drainage issues	Addressed in Section 8.55 of this report.
Other matters	
Proposal would add to the already saturated Health Centre – The Moorings	Not a material planning consideration
Threat to surrounding businesses	Not a material planning consideration
The existing Abbey Wood Grange nursery will be impacted from development in terms of access and safety	Not a material planning consideration
Pavement on the proposed visuals shown to be larger	The sketches/visuals provided of the proposed development are indicative and works within the red line boundary are only assessed.
No affordable housing	This is a minor application, and there is not a requirement under current policy to provide affordable housing.
Greedy Developers seeking profit	Not a material planning consideration

6.3 The following Councillors have made representations:

Cllr Steve O'Connell (Kenley Ward Councillor) objected and referred application to committee:

- Detrimental effect on streetscene
- Out of character
- Loss of trees
- Detrimental effect on amenity of neighbouring properties
- Dangerous traffic implications

7.0 RELEVANT PLANNING POLICIES AND GUIDANCE

7.1 In determining any planning application, the Council is required to have regard to the provisions of its Development Plan so far as is material to the application and to any other material considerations and the determination shall be made in accordance with the plan unless material considerations indicate otherwise. The Council's adopted Development Plan consists of the Consolidated London Plan 2015, the Croydon Local Plan 2018 and the South London Waste Plan 2012.

7.2 Government Guidance is contained in the National Planning Policy Framework (NPPF), issued in February 2019. The NPPF sets out a presumption in favour of sustainable development, requiring that development which accords with an up-to-date local plan should be approved without delay. The NPPF identifies a number of key issues for the delivery of sustainable development, those most relevant to this case are:

- Delivering a sufficient supply of homes
- Promoting sustainable transport;
- Achieving well designed places;

7.3 The main policy considerations raised by the application that the Committee are required to consider are:

7.4 Consolidated London Plan 2016

- 3.3 Increasing housing supply
- 3.4 Optimising housing potential
- 3.5 Quality and design of housing developments
- 3.8 Housing choice
- 3.9 Mixed and balanced communities
- 3.11 Affordable housing targets
- 3.12 Negotiating affordable housing on individual private residential and mixed use schemes
- 3.13 Affordable housing thresholds
- 5.1 Climate change mitigation
- 5.2 Minimising carbon dioxide emissions
- 5.3 Sustainable design and construction
- 5.12 Flood risk management
- 5.13 Sustainable drainage
- 5.16 Waste net self sufficiency
- 6.3 Assessing effects of development on transport capacity
- 6.9 Cycling
- 6.13 Parking
- 7.2 An inclusive environment
- 7.3 Designing out crime

- 7.4 Local character
- 7.6 Architecture
- 7.14 Improving air quality
- 7.19 Biodiversity and access to nature
- 7.21 Woodlands and trees

7.5 Croydon Local Plan 2018

- SP2 Homes
- SP6.3 Sustainable Design and Construction
- DM1 Housing choice for sustainable communities
- SP4 Urban Design and Local Character
- DM10 Design and character
- DM13 Refuse and recycling
- DM16 Promoting healthy communities
- SP6 Environment and Climate Change
- DM23 Development and construction
- DM25 Sustainable drainage systems and reducing floor risk
- SP7 Green Grid
- DM27 Biodiversity
- DM28 Trees
- SP8 Transport and communications
- DM29 Promoting sustainable travel and reducing congestion
- DM30 Car and cycle parking in new development

7.6 There is relevant Supplementary Planning Guidance as follows:

- London Housing SPG March 2016
- Croydon Suburban Design Guide Supplementary Planning Document April 2019

7.7 Emerging London Plan

7.8 Whilst the emerging New London Plan is a material consideration, the weight afforded is down to the decision maker linked to the stage a plan has reached in its development. The Plan appears to be close to adoption. The Mayor's Intend to Publish version of the New London Plan is currently with the Secretary of State and no response had been submitted to the Mayor from the Secretary of State. Therefore, the New London Plan's weight has increased following on from the publication of the Panel Report and the London Mayor's publication of the Intend to Publish New London Plan. The Planning Inspectors' Panel Report accepted the need for London to deliver 66,000 new homes per annum (significantly higher than existing adopted targets), but questioned the London Plan's ability to deliver the level of housing predicted on "small sites" with insufficient evidence having been presented to the Examination to give confidence that the targets were realistic and/or achievable. This conclusion resulted in the Panel Report recommending a reduction in London's and Croydon's "small sites" target.

7.9 The Mayor in his Intend to Publish New London Plan has accepted the reduced Croydon's overall 10 year net housing figures from 29,490 to 20,790 homes, with the "small sites" reduced from 15,110 to 6,470 homes. Crucially, the lower windfall housing target for Croydon (641 homes a year) is not dissimilar to but slightly larger than the

current adopted 2018 Croydon Local Plan target of 592 homes on windfall sites each year.

7.10 It is important to note, should the Secretary of State support the Intend to Publish New London Plan, that the overall housing target in the New London Plan would be 2,079 new homes per annum (2019 – 2029) compared with 1,645 in the Croydon Local Plan 2018. Therefore, even with the possible reduction in the overall New London Plan housing targets, assuming it is adopted, Croydon will be required to deliver more new homes than our current Croydon Local Plan 2018 and current London Plan (incorporating alterations 2016) targets.

7.11 The policies of most relevance to this application are as follows:

- SD6 Town centres and high streets
- D4 Delivering good design
- D5 Inclusive Design
- D6 Housing quality and standards
- D7 Accessible housing
- D8 Public Realm

8.0 MATERIAL PLANNING CONSIDERATIONS

8.1 The main planning issues raised by the application that the Planning Committee are required are as follows:

1. Principle of development
2. Affordable housing and housing mix
3. Townscape and visual impact
4. Trees, landscaping and biodiversity
5. Housing quality for future occupiers
6. Residential amenity of neighbours
7. Parking and highway safety
8. Flood risk
9. Sustainability
10. Other planning matters

Principle of Development

8.2 This application must be considered against a backdrop of significant housing need, not only across Croydon, but also across London and the south-east. All London Boroughs are required by the London Plan to deliver a number of residential units within a specified plan period. In the case of the London Borough of Croydon, there is a requirement to deliver a minimum of 32,890 new homes between 2016 and 2036 (Croydon's actual need identified by the Croydon Strategic Housing Market Assessment would be an additional 44,149 new homes by 2036, but as there is limited developable land available for residential development in the built up area, it is only possible to plan for 32,890 homes). This requirement is set out in policy SP2.2 of the Croydon Local Plan (CLP) (2018), which separates this target into three relatively equal sub targets with 10,760 new homes to be delivered within the Croydon Opportunity Area, 6,970 new homes as identified by specific site allocations for areas located beyond the Croydon Opportunity Area boundary and 10,060 homes delivered across the Borough on windfall sites. The emerging London Plan, which is moving

towards adoption proposes significantly increased targets which need to be planned for across the Borough. Whilst it is noted the figure for homes to be delivered on windfall sites in the Borough is proposed to be reduced in the latest version of the London Plan, the target remains significant, and it is a reduction in the target in previously published draft versions – not a reduction in the targets set out in the Croydon Local Plan 2018. In order to provide a choice of housing for people in socially-balanced and inclusive communities in Croydon, the Council will apply a presumption in favour of sustainable development of new homes.

- 8.3 This presumption includes Kenley, which is identified in the “Places of Croydon” section of the CLP (2018) as being an area for sustainable growth of the suburbs with some opportunity for windfall sites and infilling with dispersed integration that respects the existing residential character and local distinctiveness. The area around Kenley Station, including this site, is designated within the CLP (2018) as an ‘Area of Focussed Intensification’ (AFI), which allows focussed intensification associated with a change in an area’s local character. The Croydon Suburban Design Guide (2019) sets out how suburban intensification can be achieved to high quality outcomes by thinking creatively about how housing can be provided on windfall sites. Specific guidance is included in the SPD for the Kenley AFI in how developments should contribute to an increase in density and gradual character change, whilst enhancing and responding sensitively to local character and being respectful of the existing place. As is demonstrated above, the challenging targets will not be met without important windfall sites coming forward, in addition to the large developments within Central Croydon and on allocated sites.
- 8.4 The application is for outline planning permission for the replacement of an existing detached dwelling with a development comprising 9 self-contained flats. The site is located within the Kenley AFI in an established residential area. As such, providing that the proposal accords with all other relevant material planning considerations, the principle of development, in land use terms, would be considered acceptable.

Housing Mix

- 8.5 Policy SP2.7 seeks to ensure that a choice of homes is available to address the borough’s need for homes of different sizes and that this will be achieved by setting a strategic target for 30% of all new homes up to 2036 to have three or more bedrooms. CLP Policy DM1.2 seeks to prevent the net loss of 3-bedroom homes (as originally built) and homes less than 130m². The existing two storey dwelling is 4 bedroom and has a GIA of 232sqm. The proposal would result in the loss of a family sized home although would be replaced with 3x3 bedroom family sized flats (33%). The policy requirements in this respect would therefore be satisfied, with the scheme contributing positively towards much needed family accommodation in the Borough.

Townscape and Visual Impact

- 8.6 The application site comprises a two storey detached dwelling situated within a wide and relatively deep plot in a residential area. Church Road is generally characterised by detached residential buildings, of mixed scale and design but most typically two storey with some form of front and/or rear gabled projections. Whilst generally on large plots, infill development has taken place including the dwellings immediately to the opposite the site (1 Church Road), and flatted developments are apparent in the wider area on Kenley Lane, Hayes Lane and Valley Road, some apparent as modern infills.

- 8.7 CLP Policy DM10.1 states that proposals should achieve a minimum height of 3 storeys whilst respecting a) the development pattern, layout and siting; b) The scale, height, massing and density; c) The appearance, existing materials and built and natural features of the surrounding area.
- 8.8 Section 3.6 of the Suburban Design Guide SPD (2019) provides guidance on development potential within the Kenley AFI within the surrounding housing typology. The guidance of most relevance is for areas typified by 'Scattered and Detached Homes', where developments of four storeys will generally be acceptable, with plot subdivision to create rear garden development acceptable subject to consideration of development potential of neighbouring rear gardens. The guidance also highlights the importance of consideration of topography, landscaping and parking provision (discussed further below) for schemes in such locations.
- 8.9 The proposal is for a part three; part four storey (with roof accommodation) building comprising 9 self-contained flats (6x2 bed and 3x3 bed) fronting Church Road with a new proposed access drive running along the rear boundary of 2 Church Road (north), as seen in the following images. Figure 2 shows the development from an aerial perspective. Figure 3 is a streetscene shot from Church Road and Figure 4 is a 3D proposed sketch view of the development in the context.



Figure 2 Indicative Landscape Strategy Sketch



Figure 3 Proposed Streetscene



Figure 4 Proposed Sketch View

- 8.10 Given the land levels, the proposed building would read as part three; part four storey (with roof accommodation) according with the SPD guidance. Amendments were sought during the application process to make the front and rear gabled elements of the building symmetrical and have a consistent eaves line of the roof and fenestration treatment to simplify the form and expression of the building. The existing building comprises three symmetrical front and rear gables and the proposal which incorporates this re-interpretation of this within a hipped roof formation and would respond and reflect the characteristic form and appearance of the existing building and area.
- 8.11 The building lines of the properties within the immediate context of Church Road vary although the siting of the development would not extend beyond the front of 8 Church Road and be similar to the existing dwelling, as shown on figure 1, although would be wider and deeper. The building would retain a satisfactory separation from the boundaries and would effectively utilise the land levels with the lower massing concentrated at the highest part of the land (south – 8 Church Road) as seen on figure 3. Whilst forming one building, the building would be made up of three gabled elements with the gable closest to 2 Church Road (north) stepping back and as such breaking

up the massing and overall bulk of the building. This setback from the road allows for access to parking as well as a generous landscape buffer along the site frontage as encouraged by the SPD guidance. The stepping down also follows the topography of Church Road. The general form and layout of the building would integrate well within the context of the site and be proportionate within the site context without being overall dominant, overbearing or cramped.

- 8.12 A contemporary reinterpretation approach to character has been undertaken with inspiration taken from the existing dwelling and 8 Church Road (adjacent property) and gables which are commonly found in the area. The fenestration comprises squared windows and doors and also takes cues from surrounding buildings.
- 8.13 The materials used in the surrounding area are varied with the existing property comprising part render and brick. Given the weathering concerns of render, the building would be finished in a red/brown brick which is commonly found in the area. Overall, it is considered the building would sit well within the context of the site and streetscape, not appearing overly dominant or incongruous whilst meeting the AFI guidance within the SDG.
- 8.14 As is required by the SPD guidance (2019), the proposals have been designed to avoid prejudicing surrounding development. The relationships with the boundaries, including separation distances and window placement are sufficient to allow a neighbouring development to come forward with the relevant consents, including on land to the rear if the access road were to be extended.
- 8.15 Representations have raised concern regarding the increased density on site. For this suburban location with a PTAL rating of 2, the London Plan recommends a residential density of between 150 and 250 habitable rooms per hectare. The density of the development would be 216 habitable rooms per hectare, sitting within this acceptable range. Notwithstanding this, the supporting text of Policy 3.4 of the London Plan confirms that the density matrix should not be applied mechanistically, and it is worthy of note that the emerging New London Plan removes the density matrix.
- 8.16 Having considered all of the above, along with the impact on the Croydon Panorama view, against the backdrop of housing need, officers are of the opinion that the proposed development would comply with the objectives of the above policies in terms of respecting local character. Officers are further satisfied, taking into account the relationships with neighbouring buildings, along with accommodating sufficient space for adequate levels of parking, landscaping and amenity space, that the development delivers the optimum level of development for the site in this location without being of adverse impact to the character and appearance of the area.

Trees, Landscaping and Ecology



Figure 5 Indicative Landscape Strategy

Trees and Landscaping

8.17 The site is relatively well landscaped which comprises trees along the side and rear boundaries with an attractive strip of hedgerow along the front boundary. The site, along with nos. 2 and 8 Church Road, is covered by Tree Preservation Order 57 of 2008 which covers three trees in the site. Two of the protected trees along with a number of other trees and shrubs (15 of category C or U value – unsuitable for retention) are to be removed. The two protected trees to be removed add to the verdant character of this part of Kenley. Whilst the application is in outline only, with details of landscaping to be provided at a later stage, an indicative layout indicates space for a generous amount of tree/hedge replacement along the common boundaries including 3x instant impact (fastigate trees) to the rear to mitigate for the loss of the two protected rear trees.

8.18 Whilst detailed landscaping is to be secured at reserved matters stage, following submission of an indicative landscaping strategy from the applicant, officers are satisfied with the approach to be taken which retains the character of Kenley and provides the potential for further ecological and environmental benefits beyond the existing site. The Councils Arboricultural officers were consulted and considered that the two protected trees to the rear boundary along with other trees/hedges can be accepted for removal although tree planting and hedgerow, as indicatively shown on figure 4 would need to be provided, in detail, at a reserved matters stage.

8.19 This scheme must be a realistic and considered landscaping proposal for the site, which can be established and managed as part of the future development. Alongside this, tree protection measures are proposed for those trees being retained (including a

category B tree in the north western corner of the site. Tree protection measures and tree planting scheme will be requested through condition.

8.20 The existing dwelling is immediately surrounded by hardstanding in the form of a patio and driveway occupying the frontage and side of the building which leads to the detached garage. The soft landscaping covering the remainder of the garden is generally well managed. The majority of the front of the site would be soft landscaped although a new access drive (new crossover) is proposed which would be closer to T1 (north-eastern corner). The incursion in to the RPA is considered to be minimal and, subject to conditions regarding satisfactory protection to the retained trees with the site and boundaries and satisfactory tree planting scheme is provided.

Ecology

8.22 A Preliminary Ecological Appraisal and Bat Survey Report were submitted and reviewed by the Council's ecological consultants. They conclude that these are adequate to consider the likely impact on protected species and that, with appropriate mitigation in the form of a biodiversity enhancement strategy (to be incorporated into landscaping submissions) the impact would be acceptable. Further conditions can also ensure that the site is cleared and trees felled outside of bird nesting periods and other sensitive times to ensure that the impact on biodiversity is minimised. If protected species were to be identified on site during the course of construction any species and/or their habitat would be protected under the Wildlife and Countryside Act of 1981. An informative has been included to draw the applicant's attention to this.

8.23 As such, the removal of trees/hedges, some of which are protected to allow the proposed development with the proposed mitigation in place, subject to condition, would not be of detriment to the trees, landscaping and ecological values of the site.

Housing Quality for Future Occupiers

8.24 Policy SP2.8 of the Local Plan states that the Council will seek to ensure new homes will require all new homes to achieve the minimum standards set out in the Mayor of London Housing Supplementary Planning Guidance and National Technical Standards (2015) (NDSS (2015)). It would also ensure that all new homes designed for families meet minimum design and amenity standards. Table 3.3 of the London Plan sets out the minimum floor areas which should be provided for new housing. The minimum and proposed standards are set out in the below table:

Dwelling – 1 Storey	Unit Mix	Minimum GIA Required (sqm)	Proposed GIA Required (sqm)	Minimum Amenity Space Required (sqm)	Private
Flat 1	2b4p	70	96	6	
Flat 2	2b4p	70	96	6	
Flat 3	2b4p	70	116	6	

Flat 4	3b5p	86	111	7
Flat 5	2b4p	70	96	6
Flat 6	2b4p	70	116	6
Flat 7	3b5p	86	111	7
Flat 8	2b4p	70	102	6
Flat 9	3b6p	86	150	7

- 8.25 All residential units would meet the minimum standards, purely in terms of minimum floor areas.
- 8.26 Single aspect dwellings are more difficult to ventilate naturally and are more likely to overheat, and should normally be avoided. The proposed units would be dual/triple aspect with generous outlook, providing adequate levels of daylight/sunlight for future occupiers.
- 8.27 Following the approach set in the London Plan (2016) to address the unique heat island effect of London and the distinct density, a minimum ceiling height of 2.5m for at least 75% of the gross internal area is required so that new housing is of adequate quality, especially in terms of light, ventilation and sense of space. This would be achieved.
- 8.28 Policies DM10.4 and DM10.5 of the CLP require all flatted developments to provide functional and high quality private and communal amenity space, in addition to child play space, with a minimum size of 5sqm for 1 or 2 person's units and an extra 1sqm per occupant thereafter. Each of the units (including the one ground floor) would have private amenity in the form of integrated balconies/terraces. There would be 150sqm of useable communal amenity/child/play space to the rear. The arrangements would be acceptable although as part of the landscaping scheme condition, details requesting, levels, any equipment and its required landscaping and maintenance will be required, at a reserved matters stage.
- 8.29 London Plan policy 3.8 'Housing Choice' requires 90% of dwellings to meet M4(2) 'accessible and adaptable dwellings' Building Regulations requirement, with the remaining 10% required to meet M4(3) 'wheelchair user dwellings'. The London Plan recognises that securing level access in buildings of four storeys or less can be difficult and that consideration should also be given to viability and impact on ongoing service charges for residents. It is not feasible to incorporate M4(2) or M4(3) compliant layouts without enlarging the footprint and massing of the dwellings. Provision of a lift within the block would also result in a height increase and unfavourable design additions to accommodate access to the top floors in particular. In this particular circumstance, given the land levels and lack of lift, the provision of Flat 1 (ground floor) would be able to accommodate M4(3) compliance. However, this would be subject to a detailed design of step free access to the unit and car parking secured by condition, and a disabled parking space for the site to be agreed at condition stage. The landscaping

condition will require detailed information in regards to access from the building to the car parking given the land levels to the site.

8.30 As such, subject to conditions, the proposal would provide a satisfactory level of living accommodation for future occupiers.

Residential Amenity for Neighbours

8.31 The site shares the common boundary with 2 Church Road (north) to the side although the dwelling backs onto the side boundary of the host site given its orientation and corner siting. The site also shares the common boundary with 8 Church Road (south) to the side. To the rear (west) although separated by the private road are 1 and 5 Kenley Lane. To the front (east) is 1 Valley Road (corner plot) which backs onto Church Road and properties along Church Road. Figure 6 shows the footprint of the development within the context of the site and area.

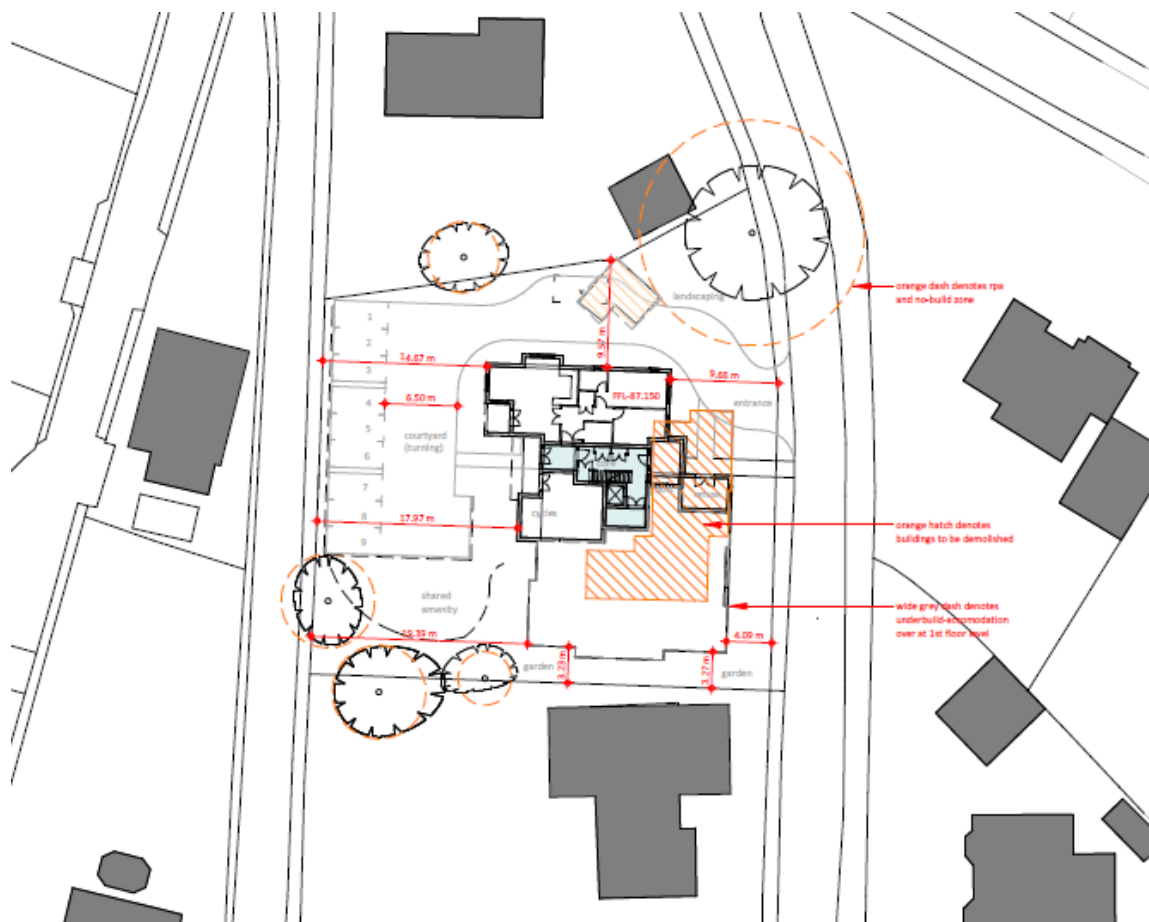


Figure 6 Proposed footprint within the context of site and area

8.32 Land levels rise from north to south with 8 Church Road siting higher than host dwelling.

2 Church Road (side)

8.33 No.2 comprises a detached single storey (bungalow) dwellinghouse which is on a corner plot with the rear of the dwelling facing onto the side of the application site. The building is separated from the common boundary by 14 metres.

- 8.34 The adjacent property sits slightly lower than the host property given the topography of Church Road. The side wall of the proposed building would have a separation distance of 22 metres to the rear of this property. As such, given the separation distance, it is considered that concerns of overbearing, visual intrusion, loss of daylight/sunlight and outlook would not be detrimental to these occupiers. Furthermore, whilst habitable side windows are proposed to the side elevation, these windows would be secondary to the room they would serve and as such, concerns of overlooking and privacy would not be raised subject to the windows being obscure glazed and non-opening unless the parts of the window which can be opened are more than 1.7 metres above the floor of the room in which the window is installed.
- 8.35 Objections have been raised in regards to light pollution in general. With the proposed access drive running along the rear boundary 2 Church Road and general siting of the parking to the rear, there is potential for levels of light to be of concerns to occupiers, especially from the vehicles. However, the existing and proposed landscaping within the boundaries, which will be controlled at a reserved matters stage and pre-commencement, will assist in minimising potential noise and light disturbance from vehicular movements along the proposed driveway and parking in general.

8 Church Road (side)

- 8.36 This property previously comprised a single storey (bungalow) dwelling although was granted planning permission (17/01672/FUL) for a contemporary two storey dwelling which has been implemented and forms part of the character.
- 8.37 The adjacent property sits higher than the host property given the gradient of the land levels. The proposed building would be separated from the common boundary by 2 metres and building to building by 4 metres. The proposed building footprint steps deeper towards the side of 2 Church Road although the building closest to no.8 would project 2 metres beyond the rear building line. Given the overall projection, which would be in accordance with the SPD guidance, it is considered that the siting of the building, and at the scale proposed and separation distance from the adjacent building would ensure that the building would not be detrimental to these occupiers in regards to overbearing impact, visual intrusion, sense of enclosure and outlook.
- 8.38 In terms of daylight/sunlight impact, the siting of the proposed building would not encroach the 45 degree angle from this property, in plan and elevation. The overall scale of the building would be similar to the adjacent property and as such loss of daylight/sunlight would not be detrimental to these occupiers.
- 8.39 Side windows are proposed which would face onto the adjacent property. However, these would be high level windows 1.7 metre above the floor level of the room they would serve. Some of these windows would serve a habitable purposes but would be secondary in nature. Given the high level nature, the siting of these windows would be acceptable which would allow additional lighting and ventilation for future occupiers whilst ensuring the neighbouring amenities are protected in terms of overlooking and privacy.

1 and 5 Kenley Lane (rear)

- 8.40 The properties to the rear comprise two storey detached dwellings. The proposed building would be separated from the front of these buildings by 21-29 metres which would ensure an acceptable relationship in residential amenity terms. Furthermore, the levels of overlooking would be mutual.

1 Valley Road (front) including 1 Church Road

- 8.41 Given the corner plot nature of 1 Valley Road, the property backs onto Church Road. The host property, although separated by the private road (Church Road) faces onto the rear garden of this property. The proposed building would be separated from the rear building line of 1 Valley Road by 27 metres (building to building). Policy DM10.6 requires proposals to avoid direct overlooking of private outdoor spaces (within 10m perpendicular to the rear elevation of a dwelling). The siting of the building would be similar to the existing dwelling and as such the level of impact would be mutual, despite being a storey (with roof accommodation) higher. Furthermore, the general scale of the building would be similar to 8 Church Road and in parts would read as two storeys given the gradient of the land. Given the separation distance to the rear of 1 Valley Road, it is considered that the proposed building would not be detrimental in regards to overbearing impact, visual intrusion, loss of daylight/sunlight, sense of enclosure and outlook.
- 8.42 In terms of impact to 1 Church Road, the siting of the property is in line with 8 Church Road with part of the boundary in the view of the host site. It is considered concerns in regards to neighbouring amenity impact would not be raised.

General Points

- 8.43 A condition will be imposed to ensure that all side (northern) windows are obscure glazed and non-opening unless the parts of the window which can be opened are more than 1.7 metres above the floor of the room in which the window is installed.
- 8.44 Given that the proposal is for a residential use in a residential area, the proposed development would not result in undue noise, light or air pollution from an increased number of occupants on the site.
- 8.45 As such, it is considered that the proposal would not be detrimental to the amenities of the adjacent occupiers in regards to overlooking, overbearing impact, visual intrusion, outlook, loss of daylight/sunlight, noise/disturbance, light pollution and sense of enclosure.

Highway Safety, Access and Parking

- 8.46 The site has a PTAL rating of 2, which indicates poor accessibility to public transport. Church Road is a narrow, private road with no on-street parking available with single yellow line markings. However, Kenley Railway Station is located 0.3 miles from the subject site. Bus stops are situated along Valley Road with access to surrounding towns and local shops and services, as is recognised by the designation of this area as an AFI.

Vehicular Parking

- 8.47 The London Plan sets out maximum car parking standards for residential developments based on Public Transport Accessibility Levels (PTAL) and local character. 1-2 bedroom units should provide less than 1 space per unit and 3 bedroom units should provide up to 1.5 spaces per unit. For the proposed scheme, the London Plan maximum requirement is 11 spaces. The Council's expectation on sites with a low PTAL is that at least one parking space will be provided for each new home on the site, with visitor spaces also required for narrow streets or those with high parking stress. The submitted scheme included a 'visitor' parking bay in proximity the front protect tree (T1). However, this has been removed given the concerns to the front tree and need for passing area for vehicles to enter and exit at the same time. The scheme still proposes 9 spaces for future occupiers to the rear of the site which constitutes 1:1 parking per unit. Given the proximity of the station, this would be acceptable.
- 8.48 The existing crossover (sited closer to 8 Church Road) would be reinstated with a new 6 metre wide crossover (sited closer to 2 Church Road) which would form a new access drive running adjacent to the building and along the rear boundary of 2 Church Road. The access drive would range from 3-5.5 metres in width with a passing place to allow vehicles to enter and exit at the same time. Tracking drawings demonstrate vehicle sightlines can be achieved. However, sightlines must be provided at the back of the verge on either side of proposed vehicle access to ensure that in future is a footway is provided, sightlines are existent. This will be sought via condition. The submitted technical note appears to show satisfactory manoeuvring space for vehicles without the need to reverse out onto the private road.
- 8.49 A condition will be attached to ensure that Parking bays next to landscaping/structures and walls must be 3 metres wide to allow passengers and drivers to alight onto the hardstanding. Furthermore, one of the spaces would require to be provided as a disabled parking space, along with a requirement for 2 spaces to have an electric vehicle charging point and all spaces to have passive provision for installation of future points.
- 8.50 Given the proposed intensification to the site and lack of pedestrian access/pavements to the front, it is expected that a contribution is made as part of improvements to the area, following the Kenley Transport Study which assessed the high level impacts of development on the surrounding road network. Whilst the proposal would provide sufficient parking on site to ensure the impact on the network is satisfactory, sustainable travel should still be promoted in accordance with policy requirements. This is of particular relevance to Kenley, taking into account the AFI designation and the characteristics of Church Road and those in the vicinity as discussed above. Therefore a contribution is recommended towards the provision of sustainable transport improvements in the area to go towards supporting the change in local character. The contribution will be used within the Kenley AFI, and could constitute traffic management measures or sustainable transport initiatives such as a provision of a car club space. These will help encourage sustainable travel. Taking into account the site's accessibility to public transport and the nature of Church Road, the proposal would provide for an appropriate number of parking spaces which would not detrimentally impact highway safety within the surrounding area.

Cycle Parking

- 8.51 Cycle parking should be provided in accordance with Draft London Plan requirements which seek a minimum of 1.5 cycle parking spaces per 1 bed unit and 2 cycle parking spaces per 2 bed+ units. The proposed development would require a minimum of 18 cycle spaces, which should be incorporated within a store in the building. The proposal would effectively utilise the land levels and incorporate cycle storage integrated into the building envelope. The siting would be acceptable although the proposal would require 5% of cycle parking spaces for larger adapted and disabled bicycles with larger spacing accordingly. Electrical sockets should be provided within the store to allow for the charging of e-bikes. This will be conditioned alongside side details including appearance, size and types of stands to be agreed at condition stage.

Refuse/Recycling Storage

- 8.52 The storage would be integrated into the envelope, towards the front, as per the cycle arrangements. This would be acceptable and in close proximity to the private road where collection will be made. Indicative refuse storage and collection arrangements have been shown. Details of this arrangement and capacity will be secured by condition.

Other Matters

- 8.53 In order to ensure that the proposed development would not have any adverse impact on the highway network or on the surrounding residents, a Demolition, Construction Logistics and Environmental Management Plan will be required by pre-commencement condition. This is of particular importance given the narrowness of Welcomes Road. This should outline measures to minimise noise and dust impacts, and disruption to neighbours.
- 8.54 An informative will be attached as a S.278 with the highway authority might be required for the proposed crossover (including reinstatement of existing). As this is a private road, you will need to contact the residents association in order to agree the works.

Flood Risk

- 8.55 The site is located within an area at risk of surface water flooding, and a critical drainage area. The applicant has submitted a Surface Water Drainage Technical Note by Mayer Brown, which confirms that a sustainable urban drainage system will be in place. It is proposed this will be through a soakway tank underneath the car parking area. Soakway calculation have been undertaken to show that the proposed infiltration tank is sufficient to drain the water from the development for up to the 1in100yr+40%cc event. The infiltration tank has been sized using the source control function on Microdrainage. Roof pipes will be installed to control rain water and it is proposed to have all hard surfaced areas in permeable paving which will discharge surface/rain water via the pipes to the tank. The level of information provided is satisfactory and a condition will be attached ensure that the Sustainable Urban Drainage Systems are carried out in accordance with the submitted technical note. Details of permeable paving will form as part of the landscaping condition – reserved matters.

Sustainability

- 8.56 The proposal would need to comply with the Energy Hierarchy of the London Plan (Consolidated with Alterations Since 2011). Minor residential applications would need to achieve a 19% carbon emission above the 2013 Building Regulations.
- 8.57 An Energy Statement has been submitted with the application. It is proposed to use heat pumps which the document suggests will achieve a 19% reduction in CO₂ emissions.
- 8.58 In addition, residential properties would need to achieve a rate and a water use target of 110L per head per day. All matters on this ground will be controlled via condition.
- 8.59 Conditions will be attached requesting a detailed energy strategy and compliance conditions in regards to water consumption.

Other Matters

- 8.60 The development will be liable for a charge under the Community Infrastructure Levy (CIL). This payment will contribute to delivering infrastructure to support the development of the Borough.

Conclusions

- 8.61 The site is in a sustainable location for new housing development, and the scale, size and amount of development appropriate for its designations and setting. The new dwellings would provide good quality family sized housing types, supported by car parking, cycle storage and bin storage. The impacts to neighbours would be largely limited to the construction period, and the further potential impacts highlighted in this report would be mitigated by the recommended planning conditions. Officers are satisfied that the scheme is worthy of a planning permission.
- 8.62 As such, the proposal would comply with the relevant policies set out within the Draft London Plan 2019, London Plan 2016, Croydon Local Plan 2018 as well as the Croydon Suburban Design Guide 2019.
- 8.63 All other relevant policies and considerations, including equalities, have been taken into account.