PART 6: Planning Applications for Decision

Item 6.1

1.0 SUMMARY OF APPLICATION DETAILS

Ref: Location: Ward:	20/05474/FUL 3 Kingswood Way, South Croydon, CR2 8QL Selsdon Vale and Forestdale
Description:	Demolition of single-family dwellinghouse and erection of 3x 3-storey terraced houses, 2x 3-storey semi-detached houses and 2x 2-storey semi-detached houses containing 6x-3 bedroom and 1x 2-bedroom homes with associated
Drawing Nos:	access, car parking, cycle and refuse storage. EX03-S1-100A; EX03-S1-101C; EX03-S1-102; EX03-S1- 103C; EX03-S1-104A; EX03-S1-105A; EX03-S1-106C; EX03-S1-107B; EX03-S1-108C; EX03-S1-109B; EX03- S1-110C; EX03-S1-111B; EX03-S1-112B; EX03-S1- 113A; EX03-S1-114A; EX03-S1-115C; EX03-S1-117A;
Applicant: Case Officer:	EX03-S1-118A; EX03-S1-120C. Mr Gerasimos Stamatelatos of Aventier Ltd Nathan Pearce

	1B 2P	2B 3P	2B 4P	3B 4P	4B+	Total	
Existing					1	4	
Provision					I	I	
Proposed		4	1		6		7
Provision		Ι		0		ſ	

	Car parking spaces	Cycle parking spaces
Existing	1	0
Proposed	9	14

1.1 This application is being reported to Planning Committee because objections above the threshold in the Committee Consideration Criteria have been received and it has been referred by a ward councillor.

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 £10,500 for improvements to sustainable transport improvements in Selsdon Vale and Forestdale Ward including but not limited to on street car clubs with EVCP's and/or highway changes

such as on street restrictions, membership of car club for the units for 3 years.

- b) And any other planning obligations considered necessary.
- 2.2 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. Time limit of 3 years
- 2. Development to be carried out in accordance with the approved drawings and reports except where specified by conditions
- 3. Construction Logistics Plan
- 4. Tree Protection Plan
- 5. Details of facing materials
- 6. Landscaping
- 7. Sustainable urban drainage details
- 8. Electric Vehicle Charging Points
- 9. Cycle parking and refuse
- 10. Car parking
- 11. Visibility splays
- 12. Accessible units
- 13. Energy emissions
- 14. Ecology conditions
- 15. Any other planning condition(s) considered necessary by the Director of Planning and Strategic Transport

Informatives

- 1)Section 106
- 2)CIL
- 3)Code of practice for Construction Sites
- 4)Boilers
- 5)Refuse
- 6)Waste notice
- 7)Wildlife
- 8)Any other informative(s) considered necessary by the Director of Planning and Strategic Transport

3.0 PROPOSAL AND LOCATION DETAILS

- 3.1 The proposal includes the following:
 - Demolition of existing detached house
 - Erection of a short terrace of three two-storey dwellinghouses plus accommodation in roof-space at the front of the site.
 - Erection of two semi-detached pairs of dwellinghouses plus accommodation in roof-space at the rear of the site.
 - The above buildings would provide 1 x 2-bedroom house (3 person), 6 x 3bedroom houses.

- Provision of 9 off-street parking spaces including one disabled bay.
- Provision associated refuse/cycle stores.



Fig 1: Site plan

3.2 Amended plans were received on 05.02.2021 which increased the red line site boundary to incorporate the land between the front boundary and the highway of Kingwood Way. This was necessary to capture the proposed vehicle and pedestrian access routes within the permission. This land is not owned by the applicant and the ownership is unknown. A solicitor's letter has been received stating that the client is satisfied that the verge would be adjudged to be within the current house owners' unregistered ownership and that the permission can be implemented in full. A neighbour renotification was undertaken. Some minor changes were also made to the design of the buildings, main external façade material changed to flint stone, alterations to parking layout and refuse storage.

Site and Surroundings

3.3 The application site is a large detached property situated on the east side of Kingswood Way. Kingswood Way rises up to the south however the topography of the site is mostly flat.

3.4 The surrounding area is mainly residential in character. Whilst there is no distinct style in regard to the properties along Kingswood Way, properties have significant setback from the highway normally behind mature trees however the frontage of the application site consists of horizontal soft landscaping and some hardstanding. the majority of properties appear to be detached family dwellinghouses. The site has a Public Transport Accessibility Level (PTAL) of 1b.



Fig 2: Aerial street view highlighting the proposed site within the surrounding street-scene

Planning History

3.5 None relevant

4.0 SUMMARY OF KEY REASONS FOR RECOMMENDATION

• The proposed development would create good quality residential accommodation that would make a positive contribution to the borough's housing stock and would make a small contribution to the Council achieving its housing targets as set out in the London Plan (2021) and Croydon Local Plan (2018) and emerging housing targets. The proposed development would provide an appropriate mix of units including 6x three-bed houses.

- The proposed development would be of an appropriate mass, scale, form and design that would be in keeping with its context, thus preserving the appearance of the site and surrounding area.
- The proposed development would not cause unacceptable harm to the amenities of neighbouring residential occupiers.
- The proposed development would not have an adverse impact on the operation of the highway.
- Subject to the imposition of conditions, the proposed development would not cause unacceptable harm to visual amenity of trees.
- Subject to conditions, the proposals would not have an adverse impact on flooding.
- Sustainability aspects can be controlled by conditions.

5.0 CONSULTATION RESPONSE

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

Place Services (Council's ecological consultant)

5.1 The council's ecological consultants are satisfied that there is sufficient ecological information available for determination and raise no objection subject to securing biodiversity mitigation and enhancement measures by condition.

6.0 LOCAL REPRESENTATION

6.1 The application has been publicised by 6 letters of notification to neighbouring properties in the vicinity of the application site. The number of representations received from neighbours, a local ward Councillor and the local MP in response to notification and publicity of the application are as follows:

No of individual responses: 75 Objecting: 74 Supporting: 0 Comment: 1

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:

Summary of objections	Response			
Principle of development				
Overdevelopment and intensification	Addressed in the report at paragraphs 8.2 – 8.6			
Loss of family home	Addressed in the report at paragraph 8.2 – 8.6			
Poor quality development	Addressed in the report at paragraphs 8.2 – 8.6			
Design				
Out of character	Addressed in the report at paragraphs 8.7 – 8.12			
Massing too big	Addressed in the report at paragraphs 8.7 – 8.12			
Over intensification – Too dense	Addressed in the report at paragraph 8.7 – 8.12			

Addressed in the report at paragraphs 8.7 – 8.12				
Addressed in the report at paragraphs 8.23				
Addressed in the report at paragraphs 8.9				
Number of storeys Addressed in the report at paragraphs 8.9 Amenities Amenities				
Addressed in the report at paragraphs 8.13 – 8.18				
Addressed in the report at paragraphs 8.13 – 8.18				
Addressed in the report at paragraphs 8.13 – 8.18				
Addressed in the report at paragraphs 8.13 – 8.18				
Addressed in the report at paragraphs 8.13 – 8.18				
Addressed in the report at paragraphs 8.31				
Traffic & Parking				
Addressed in the report at paragraphs 8.25 – 8.32				
Addressed in the report at paragraphs 8.25 – 8.32				
Addressed in the report at paragraph 8.25 – 8.32				
Addressed in the report at paragraph 8.25 – 8.32				
Refuse and recycling provision Addressed in the report at paragraph 8.25 – 8.32 Other matters Other matters				
Addressed in the report at paragraph 8.41				
Addressed in the report at paragraphs 8.33 – 8.38				
Addressed in the report at paragraph 8.40				
Addressed in the report at paragraph 8.43				
Addressed in the report at paragraph 8.42				
Addressed in the report at paragraphs 8.33 – 8.35				

- 6.3 Cllr. Andy Stranack (Selsdon Vale and Forestdale Ward) objected to the application and raised the following issues:
 - Overdevelopment of site

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. Such 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 2021, the Croydon Local Plan (February 2018), and the South London Waste Plan 2012.
- 7.2 Government Guidance is contained in the National Planning Policy Framework (NPPF) revised 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:

- Promoting sustainable transport;
- Delivery of housing
- Promoting social, recreational and cultural facilities and services the community needs
- Requiring good design.
- 7.3 The main policy considerations raised by the application that the Committee are required to consider are:

London Plan (2021)

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

- D1 London's form, character and capacity for growth
- D2 Infrastructure requirements for sustainable densities
- D3 Optimising site capacity through the design-led approach
- D4 Delivering good design
- D5 Inclusive design
- D6 Housing quality and standards
- D7 Accessible housing
- H1 Increasing housing supply
- H10 Housing size mix
- S1 Developing London's social infrastructure
- S4 Play and informal recreation
- HC1 Heritage conservation and growth
- G1 Green infrastructure
- G4 Open space
- G5 Urban greening
- · G6 Biodiversity and access to nature
- G7 Trees and woodlands
- SI1 Improving air quality
- SI2 Minimising greenhouse gas emissions
- SI3 Energy infrastructure
- SI5 Water infrastructure
- SI7 Reducing waste and supporting the circular economy
- SI12 Flood risk management
- SI13 Sustainable drainage
- T1 Strategic approach to transport
- T2 Healthy streets
- T3 Transport capacity, connectivity and safeguarding
- T4 Assessing and mitigating transport impacts
- T5 Cycling
- T6 Car parking
- T6.1 Residential parking
- T7 Deliveries, servicing and construction

- T9 Funding transport infrastructure through planning
- DF1 Delivery of the plan and planning obligations
- 7.5 Croydon Local Plan (adopted February 2018)
 - SP1 The places of Croydon
 - SP2 Homes
 - DM1 Housing choice for sustainable communities
 - SP4 Urban Design and Local Character
 - DM10 Design and character
 - DM13 Refuse and recycling
 - SP6 Environment and Climate Change
 - DM23 Development and construction
 - DM24 Land contamination
 - DM25 Sustainable drainage systems and reducing flood 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 Suburban Design Guide Supplementary Planning Document (SPD) 2019

The SPD is a Housing Design Guide that provides guidance on suburban residential developments and extensions and alterations to existing homes across the borough. The SPD is a design guide for suburban developments likely to occur on windfall sites where existing homes are to be redeveloped to provide for several homes or proposals for building homes in rear gardens.

7.7 Other relevant Supplementary Planning Guidance as follows:

- London Housing SPG, March 2016
- National Technical Housing Standards, 2015
- National Planning Practice Guidance

8.0 MATERIAL PLANNING CONSIDERATIONS

- 8.1 The principal issues of this particular application relate to:
 - The principle of the development;
 - Impact of the development on the character and appearance of the area;
 - Impact on residential amenities;
 - Standard of accommodation;
 - Highways impacts;
 - Impacts on trees and ecology;
 - Sustainability issues; and
 - Other matters

The Principle of Development

- 8.2 Both the London Plan and the NPPF place significant weight on housing delivery and focus on the roles that intensification and small sites in particular can play in resolving the current housing crisis. It is acknowledged that windfall schemes which provide sensitive renewal and intensification of existing residential areas play an important role in meeting the demand for additional housing in Greater London, helping to address overcrowding and affordability issues. Furthermore the Croydon Local Plan 2018 anticipates that roughly a third of housing delivery over the plan period will come from District Centres and windfall sites.
- 8.3 The site is a windfall site which could be suitable for sensitive renewal and intensification.
- 8.4 Policy SP2.7 sets a strategic target of 30% of new homes to be 3-bedroom homes and small family homes and homes built as 3-bed homes are also protected. The existing dwellinghouse is a 4-bed house and the proposal would provide 6x 3-bed units which would provide adequate floorspace for families. The overall mix of accommodation would be acceptable and would result in a net gain in family accommodation.
- 8.5 Representations have raised concern over the intensification of the site and overdevelopment. The site is in a suburban setting with a PTAL rating of 1b and is a "small site" (as defined by policy H2 of the London Plan). This advocates that such sites should significantly increase their contribution to London's housing needs and that local character evolves over time and needs to change in appropriate locations to accommodate additional housing on small sites.. In this instance the proposal is acceptable, respecting the character and appearance of the surrounding area, and does not demonstrate signs of overdevelopment (such as poor quality residential units or unreasonable harm to neighbouring amenity). As such the scheme is supported.

<u>The effect of the proposal on the character of the area and visual amenities of the streetscene</u>

- 8.6 The existing property is not protected from demolition by existing policies and its demolition is acceptable subject to a suitably designed replacement coming forward. The proposal seeks to replace it with 7 units formed of one 2-storey row at the front and two 2-storey rows at the rear. The scheme has been specifically designed to resemble three large replacement houses rather than a single terrace row. Officers are satisfied that the scheme respects the street-scene.
- 8.7 The Croydon Local Plan has a presumption in favour of three storey development. The blocks consist of two stories plus accommodation in the roof. The application provides a high quality built form that respects the land level, pattern, layout and siting in accordance with Policy DM10.1.

8.8 The height, scale and massing of the scheme would be acceptable, given that the site works well with the topography and would sit well with the adjoining properties.



Fig 3: Front elevation of front houses

8.9 The design of the buildings would incorporate a traditional styled appearance consisting of gables and bays to the front elevation, maintaining the overall street scene with use of an appropriate materials palette with an adequate balance between flint stone, soldier course brickwork, hanging tile, glazing and appropriate roof proportions. The main front element would present a traditional architectural response, consisting of a gabled bay. It is noted that flint stone is characteristic of the area and as such its use would be acceptable as a facing material.



Fig 4: Proposed site plan showing proposal in relation to neighbouring properties

- 8.11 Policy DM10.2 seeks to create well defined and designed public and private spaces and advises that forecourt parking should only be allowed where it does not cause undue harm to the character or setting of the building and is large enough to accommodate parking with sufficient screening to prevent vehicles encroaching on the public highway. The frontage of the site would remain predominantly soft landscaped with hardstanding for parking within the centre of the site between the buildings. Given the overall scale of the development and number of forecourt hardstanding areas in the vicinity, the extent of hardstanding would not be excessive. The site would offer sufficient opportunities for soft landscaping to the front, rear and around the site boundary.
- 8.12 The application site is a substantial plot within an established residential area. The scale and massing of the new buildings would generally be in keeping with the overall scale of development found in the immediate area whilst sensitively intensifying it and the layout of the development would respect the streets' pattern and rhythm.



Fig 5: CGI of the front of the site from the highway

Having considered all of the above, against the backdrop of housing need, officers are of the opinion that the proposed development would comply with the objectives of the above policies and the Suburban Design Guide SPD 2019 in terms of respecting local character.

The effect of the proposal upon the amenities of the occupiers of adjoining properties

8.13 Policy DM10.6 states that the Council will not support development proposals which would have adverse effects on the amenities of adjoining or nearby properties, or have an unacceptable impact on the surrounding area. This can include a loss of privacy, a loss of natural light, a loss of outlook or the creation of a sense of enclosure. The properties with the potential to be most affected are the adjoining properties at 1 & 5 Kingswood Way, dwellings opposite on Kingswood Way and to the rear on Old Farleigh Road.



Fig 6: Proposed site plan

1 Kingswood Way

8.14 This dwelling is to the north and is at a similar level than the proposal site. The External Daylight Study shows that 1 small side facing window would fail the BRE Vertical Sky Component test, with the development resulting in a 'minor' impact, however this window is not considered to be a primary habitable room window. The proposed front building would not break a 45 degree line drawn from front and rear habitable room windows. The houses at the rear would conflict with the 45 degree lines of the adjoining dwelling, however the distance from the rear of the dwellings would be more than 15m and it is considered that given the positioning and separation distance that the proposed development would not result in a significant loss of privacy and overlooking of neighbouring property. Although there would be some additional overlooking of neighbouring private amenity, this amenity is already overlooked by the existing windows of neighbouring properties and it would not be the first 10m which would be directly overlooked (the area protected in policy from direct overlooking).

5 Kingswood Way

8.19 This dwelling is to the south and is at a similar level than the proposal site. The External Daylight Study shows that 1 conservatory window would fail the BRE Vertical Sky Component test, with the development resulting in a 'minor' impact, however the conservatory is served by other widows and is not considered to be a primary habitable room window. Two first floor side windows are proposed on the block at the front of the site. These are not considered to lead to a loss of privacy for neighbouring occupiers given the separation distance and the positioning where they will face towards the front landscaping. The rear of the proposed rear dwellings would not break a 45 degree line drawn from rear habitable room windows, it is considered that given the separation distances and the angles that there would not be a significant impact on this dwellings in terms of loss of light, outlook, privacy or sense of overbearing. This is considered to be an acceptable relationship in a suburban setting such as this.

Dwellings opposite on Kingswood Way and to the rear on Old Farleigh Road

8.21 It is considered that given the separation distances that there would not be a significant impact on these dwellings in terms of loss of light, outlook, privacy or sense of overbearing. This is considered to be an acceptable relationship in a suburban setting such as this.

General

8.22 As regards noise and disturbance, the proposed development would not result in undue noise, light or air pollution as a result of an increased number of occupants on the site. The increased number of units would increase the number of vehicle movements to and from the site, but this would not be significant and would not be overly harmful.

The effect of the proposal upon the amenities of future occupiers

- 8.23 The Nationally Described Space Standards (NDSS) provide minimum technical space standards for new dwellings in terms of the gross internal floor areas and storage. All of the proposed units would meet the minimum required gross internal floor area.
- 8.24 The units would have access to private amenity space which meets the required standard.
- 8.27 All units can meet M4(2) standard and one three-bedroom unit meets M4(3), in compliance with policy.
- 8.28 Overall the development is considered to result in a high quality development, including an uplift in family accommodation, and will offer future occupiers a good standard of amenity and thus accords with relevant policy.

Traffic and highway safety implications

- 8.29 The Public Transport Accessibility Level (PTAL) rating is 1b which indicates poor accessibility to public transport. The London Plan and Policy DM30 of CLP2018 sets out that maximum car parking standards for residential developments based on public transport accessibility levels and local character. This states that, in this PTAL, properties should provide up to 1.5 spaces per unit. In line with the London Plan, the proposed development could therefore provide up to a maximum of 10.5 spaces. It is important to note however that it is not necessarily desirable to provide car parking up to the maximum standards given the requirements of both the London Plan and Croydon Local Plan which seek to reduce reliance on car usage and promote/prioritise sustainable modes of transport. As such a lower level of car parking can be supported and is encouraged in line with the ambitions of the Development Plan.
- 8.30 The proposed car parking provision of 9 spaces is considered acceptable when taking into account the site constraints, the need to provide high quality multi-functional spaces whilst ensuring the best use of land.
- 8.31 There are a number of representations that refer to the parking provision, onstreet parking and highway safety at the site. In respect to highway safety, the scheme provides 9 off-street parking spaces including 1 disabled space and these will need to adhere to the parking visibility splays and parking standards to ensure that safety requirements are adhered to and these have been secured through conditions.
- 8.32 A financial contribution of £10,500 will be secured through a Section 106 contribution that will go towards improvements to sustainable transport including but not limited to on street car clubs with EVCP's and/or highway changes such as on street restrictions or membership of car club for the units for 3 years. This is required because of the increased traffic generated from the increased number of units.
- 8.33 In compliance with the London Plan, electric vehicle charging points should be installed in the parking area and this can be secured by way of a condition. Cycle storage facilities would comply with the London Plan (which would require 14 spaces) as these are provided by way of secure cycle stores within the rear gardens of each house. This can be secured by way of a condition.
- 8.34 The refuse arrangements have been indicated on the site plan, each house would require 1x180ltr landfill bin, 1x240ltr recycling comingled recycling bin and 1x240ltr paper & card recycling bin. The front refuse store/refuse collection area would be located towards the front of the site within 20m of the highway. It would be the responsibility of the occupants of the rear dwellings to take their refuse to the collection area on collection day. Although the paved route from the rear bin store to the collection area would be greater than 25m it is a flat route that is not unreasonable for occupiers to take their bins for collection. Details can be secured by condition.

8.35 A Demolition/Construction Logistic Plan (including a Construction Management Plan) will be needed before commencement of work and this could be secured through a condition.

Trees and Ecology

- 8.36 The site contains some established trees and shrubs. There are no protected trees within the site. 1 category B, 7 category C and 1 category U trees will be removed, these trees have a low amenity value and are not protected. The site provides an opportunity to plant a number of new trees as part of a landscape scheme. A landscaping and planting plan securing an uplift in biodiversity can be conditioned.
- 8.37 Foundations for parts of a new dwelling and refuse store extend into the theoretical Root Protection Areas of some trees. Because such small portions of the RPAs shall be affected, the potential impact is considered to be very minor. Mitigation is proposed within the Arboricultural Report.
- 8.38 The works should be undertaken in accordance with the tree protection plan; Arboricultural Report and Impact Assessment recommendations and this has been conditioned.



Fig 7: Extract from submitted soft landscaping scheme (Indicative only)

8.39 A Preliminary Ecological Appraisal and Preliminary Inspection for Bats report relating to the likely impacts of development on designated sites, protected species and priority species & habitats has been submitted with the application which has been assessed by the Council's ecology consultant. In addition a Bat Survey did not record any evidence of bats. No evidence of notable or protected mammal species was noted.

- 8.40 The ecology consultant is satisfied that there is sufficient ecological information available for determination. The likely impacts on protected and priority species & habitats can be made acceptable with appropriate mitigation measures secured.
- 8.41 The mitigation measures identified in the Bat Emergence/Re-entry Surveys and Mitigation Report should be secured and implemented in full. This is necessary to conserve and enhance protected and priority species particularly bats. This has been conditioned.
- 8.42 A Biodiversity enhancement strategy is also required as a pre-commencement condition to enhance protected and priority species/habitats. This has been conditioned.
- 8.43 The Council has certainty of the likely impacts on protected species and sites. Through the imposition of planning conditions and work undertaken to date, the local planning authority has operated in accordance with its statutory duties relating to biodiversity and national and local policy requirements.

Sustainability Issues

8.44 Conditions can be attached to ensure that a 19% reduction in CO2 emissions over 2013 Building Regulations is achieved and mains water consumption would meet a target of 110 litres or less per head per day.

Other Matters

- 8.45 The site is not located in any designated flood risk area. The applicants have submitted a Surface Water and SuDS Assessment which is based on a desktop study of underlying ground conditions. It is likely that infiltration of surface water runoff following redevelopment may be feasible. The parking area will incorporate permeable paving which will provide capacity for surface water runoff from hardstanding areas in up to the 1 in 100 years plus 40% climate change event. This can be secured through a condition.
- 8.46 Representations have raised concern that construction works will be disruptive and large vehicles could cause damage to the highway. Whilst the details submitted to date might well be acceptable, it would be prudent to condition a Construction Logistics Plan to be approved, as appointed contractors may have an alternative approach to construction methods and the condition ensures that the LPA maintains control to ensure the development progresses in an acceptable manner.
- 8.47 Representations have been made in respect to a lack of affordable homes being provided at the site, however the scheme is for nine units and as such is under the threshold where the provision for affordable homes would be required.

8.48 Representations have raised concerns that local schools and other services will be unable to cope with additional families moving into the area. 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 area, such as local schools.

Conclusions/planning balance

- 8.49 The principle of development is acceptable within this area. The design of the scheme is of an acceptable standard given the proposed and conditioned landscape and subject to the provision of suitable conditions the scheme is acceptable in relation to residential amenity, transport, sustainable and ecological matters. Thus the proposal is considered in general accordance with the relevant polices.
- 8.50 All other relevant policies and considerations, including equalities, have been taken into account.