

1.0 APPLICATION DETAILS

Ref: 21/03943/FUL
Location: 51 Addiscombe Road, Croydon, CR0 6SB
Ward: Addiscombe West
Description: Change of Use from a single dwellinghouse to provide a House of Multiple Occupation (HMO) (Use Class Sui Generis), comprising 13 bedrooms with shared kitchen facilities, together with landscaping, changes to fenestration, designated refuse / recycling and cycle stores
Drawings: PA-101 Rev 01 (Location Plan); PA-102 Rev 01 (Block Plan); PA-102 Rev 01 (Site Plan Existing) PA-102 Rev 04 (Site Plan Proposed); PA-102 Rev 02 (Site Plan Existing); PA-103 Rev 1 (Existing Plans); PA-104 Rev 01; PA-105 Rev 03 (Proposed Plans); PA-106 Rev 03 (Proposed Elevations); PA-110 Rev 03 (Proposed Plans + Furniture)
Statements: Design and Access Statement, Outline Management Strategy, Internal Daylight Assessment, Transport Statement and Planning Statement received on 26/07/2021; Fire Statement uploaded on 14/02/2022
Agent: Windrush Housing Association
Applicant: Charles Rose, City Planning
Case Officer: Natalie Rowland

Number of Vehicle Parking Spaces	Number of Cycle Parking Spaces
None	13

1.1 This application is being reported to Planning Sub-Committee in accordance with the following committee consideration criteria:

- Objections above the threshold in the Committee Consideration Criteria; and
- Referrals from Ward Cllrs. Jerry Fitzpatrick and Sean Fitzsimons.

2.0 RECOMMENDATION

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

- Removal of access to resident parking permits and contacts in Council run car parks.
- Provision of parking permit to be used by the management company for site inspections.
- Reinstatement of the kerb at the front of the property.

- 2.2 That the Director of Planning and Sustainable Regeneration has delegated authority to negotiate the legal agreement indicated above.
- 2.3 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

1. Three-year time limit for commencement.
2. Requirement for development to be carried out in accordance with the approved drawings and reports.

Pre-Commencement of Development Conditions

3. Submission and approval of details of the materials specifications including facing materials, joinery and openings.
4. Submission and approval of cycle storage and refuse details.
5. Submission and approval of details on the Landscaping Strategy including details of materials/plantings for hard/soft landscaping and front boundary treatment.

Compliance Conditions

6. Restriction on occupancy to 13 persons
7. Fire Statement
8. Any other planning condition(s) considered necessary by the Director of Planning and Strategic Transport

INFORMATIVES

1. Community Infrastructure Levy
2. Code of practice for Construction Sites
3. Compliance with Building/Fire Regulations
4. Refuse and cycle storage Informative
5. Any other informative(s) considered necessary by the Director of Planning and Strategic Transport

3.0 PROPOSAL AND LOCATION DETAILS

Proposal

- 3.1 The application seeks Planning Permission for the change of use of the property from a single dwelling (Use Class C3) to provide a House of Multiple Occupation (HMO) (Use Class Sui Generis), comprising 13 bedrooms with shared kitchen facilities. Each room would be for single occupancy.
- 3.2 Other proposed alterations include:
 - Changes to fenestration
 - replacement of garage door with a window;

- enlargement of the ground floor window on the front elevation;
 - six (6) rooflights to the main roof;
 - four (4) rooflights to the flat roof of the garage;
 - new first floor obscure glazed window to the western flank;
 - new ground floor obscure glazed window to the eastern flank;
 - replacement patio door to the rear;
 - enlargement of the first floor window on the rear elevation; and
 - new door and window to the rear of the garage.
- New ramp access to the front and rear
 - Landscaping
 - Provision of associated refuse and cycle storage.

3.3 The rear garden serves as amenity space for the proposed occupants of the house. There is level access from the front of the plot, through the building and the communal kitchen to the rear.

3.4 The proposed bin store is located along the eastern boundary to the front of the property and within close reach of the highway. Secure cycle storage is provided along the front boundary, screened by landscaping. Other planting and landscaping is proposed to the front of the plot.

Site and Surroundings

3.5 The site comprises a link detached two storey dwellinghouse with accommodation in the roof space. The site is located on the northern side of Addiscombe Road between Blake Road and Brickwood Road which extend from Addiscombe Road in a northerly direction.

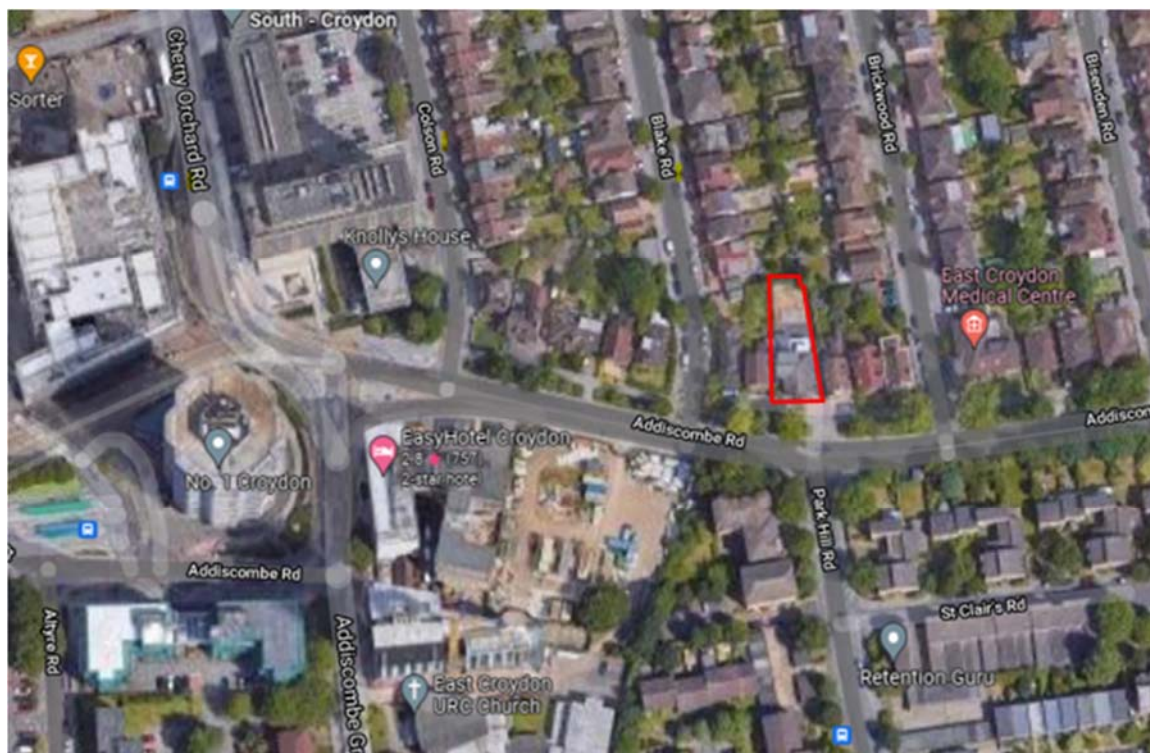


Figure 1 - Google maps site plan

- 3.6 A vehicular crossover extends from the adjacent highway and provides vehicular access to 51 and 53 Addiscombe Road. The entirety of the front of the plot is covered with hardstanding with a vehicular crossover allowing access from Addiscombe Road.
- 3.7 The surrounding area is residential in character with East Croydon Station and the Metropolitan Centre less than 300 metres to the west.
- 3.8 The site has a PTAL of 6b, which is the highest PTAL rating and lies within the East-Inner Controlled Parking Zone (CPZ).

Planning History

- 3.9 14804A 1 – House. Approved on 14/01/1911 [and implemented]
- 3.10 10/00734/LP - Erection of dormer extension in rear roof slope. Approved on 03/05/2010
- 3.11 10/01560/P - Erection of attached garage at side. Approved on 12/07/2010
- 3.12 10/01973/P - Erection of single storey rear extension. Approved on 09/08/2010

4.0 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The proposal would provide much needed low cost housing and is acceptable in principle.
- The design and appearance of the development is acceptable. Planning conditions are recommended to ensure that the external alterations would use high quality materials, detailing and landscaping.
- The proposed accommodation would provide adequate living conditions for future occupiers with acceptable light and outlook levels and appropriate communal facilities.
- The living conditions of adjoining occupiers would not be harmed.
- The level of cycle parking and refuse provision is considered acceptable subject to conditions.

5.0 CONSULTATIONS

- 5.1 TFL - No objection

6.0 LOCAL REPRESENTATION

- 6.1 Fifteen (15) neighbouring properties were notified of the application and invited to comment. Three hundred and fifty three (353) representations were received, of which all were objections, aside from three (3) which were in favour. MP Chris Philip is noted as an objector. The concerns raised in the objections received are

summarised in Table 6.0, which also contains the Case Officer's response to the objections.

SUMMARY OF OBJECTIONS	RESPONSE
Principle of development	
Overdevelopment	Please refer to paragraphs 8.2-8.4 of this report
Not appropriate location for HMO	Please refer to paragraph 8.29 of this report
Loss of family home	Please refer to paragraphs 8.2-8.4 of this report
Design	
Fenestration not in keeping	Please refer to paragraphs 8.5-8.8 of this report
Amenity	
Adverse impact on neighbours	Please refer to paragraphs 8.21-8.27 of this report
Antisocial behaviour	Please refer to paragraphs 8.27 of this report
Cramped living conditions	Please refer to paragraphs 8.9-8.20 of this report
Highways & Parking	
Excessive parking	Please refer to paragraphs 8.30-8.33 of this report
Insufficient cycle storage	Please refer to paragraphs 8.34-8.36 of this report
Insufficient refuse storage / litter	Please refer to paragraphs 8.37-8.40 of this report
Inaccurate Transport Plan	Please refer to paragraph 8.30 of this report
Other matters	
Likely to attract crime	Please refer to paragraph 8.27 of this report
No engagement with residents	Whilst the Council can encourage developers to discuss their plans with the local community, unfortunately there

	is no formal requirement for them to do so.
Lack of security / management	Please refer to paragraph 8.26-8.27 of this report
Insufficient infrastructure	As an existing 5B 10P house, the uplift to the potential number of occupants is not considered to result in unacceptable impact on infrastructure.
No community feeling	Not a planning consideration
Will devalue nearby properties	Not a planning consideration
Legal covenant on land	Not a planning consideration
SUMMARY OF SUPPORT	RESPONSE
Need to support community	Noted

6.2 Ward Cllr Jerry Fitzpatrick has made the following representations:

- Loss of single family home
- Harm to amenity of neighbouring properties
- Sub-standard accommodation
- Daylight issues
- Insufficient cycle storage
- Inadequate refuse provision

6.3 Ward Cllr Sean Fitzsimons has made the following representations:

- Loss of single family home
- Harm to amenity of neighbouring properties
- Sub-standard accommodation
- Daylight issues
- Insufficient cycle storage
- Inadequate refuse provision

6.4 The concerns of the Ward Councillors are acknowledged and addressed in the assessment below.

7.0 RELEVANT PLANNING POLICIES AND GUIDANCE

7.1 This recommendation to grant planning permission has been taken having regard to the policies and proposals in the London Plan (2021) and Croydon Local Plan (2018), as well as, to all relevant material considerations:

Town and Country Planning Act 1990 (As Amended)

National Planning Policy Framework (2021)

Section 4 Decision Making

Section 5	Delivering a Sufficient Supply of Homes
Section 8	Promoting Healthy and Safe Communities
Section 9	Promoting Sustainable Transport
Section 11	Making Effective Use of Land
Section 12	Achieving Well-Designed Places
Section 15	Conserving and Enhancing the Natural Environment

London Plan (2021)

Policy GG2	Making the Best Use of Land
Policy GG4	Delivering the Homes Londoners Need
Policy D1	London's Form, Character and Capacity for Growth
Policy D2	Infrastructure Requirements for Sustainable Densities
Policy D3	Optimising Site Capacity through the Design-Led Approach
Policy D4	Delivering Good Design
Policy D5	Inclusive Design
Policy D6	Housing Quality and Standards
Policy D8	Public Realm
Policy D11	Safety, Security and Resilience to Emergency
Policy D12	Fire Safety
Policy D14	Noise
Policy H1	Increasing Housing Supply
Policy H2	Small Sites
Policy G5	Urban Greening
Policy G6	Biodiversity and Access to Nature
Policy SI1	Improving Air Quality
Policy SI2	Minimising Greenhouse Gas Emissions
Policy SI4	Managing Heat Risk
Policy SI7	Reducing Waste and Supporting the Circular Economy
Policy T1	Strategic Approach to Transport
Policy T3	Transport Capacity, Connectivity and Safeguarding
Policy T4	Assessing and Mitigating Transport Impacts
Policy T5	Cycling
Policy T6	Car Parking
Policy T7	Deliveries, Servicing and Construction
Policy DF1	Delivery of the Plan and Planning Obligations

Croydon Local Plan (2018)

Policy DM1	Housing Choice for Sustainable Communities
Policy DM10	Design and Character
Policy DM13	Refuse and Recycling
Policy DM16	Promoting Healthy Communities
Policy DM27	Protecting and Enhancing Our Biodiversity
Policy DM29	Promoting Sustainable Travel and Reducing Congestion
Policy SP2	Homes
Policy SP4	Urban Design and Local Character
Policy SP6	Environment and Climate Change
Policy SP8	Transport and Communication

Other Relevant Policies & Guidance

Borough Character Appraisal (LBC - 2015)

Housing SPG (GLA - 2015)
Suburban Design Guide SPD (LBC - 2019)
Technical Housing Standards - Nationally Described Space Standard (2015)
Waste and Recycling in Planning Policy Document (LBC, 2015, As Amended)

8.0 MATERIAL PLANNING CONSIDERATIONS

8.1 The main planning issues relevant in the assessment of this application are as follows:

1. Principle of Development
2. Design and Appearance
3. Residential Amenity of Future Occupiers
4. Residential Amenity of Adjoining Occupiers
5. Highways, Parking and Refuse
6. Trees, Landscaping, Biodiversity and Sustainability
7. Flood Risk and Sustainable Drainage
8. Other Matters

Principle of Development

8.2 Paragraph 59 of the National Planning Policy Framework (NPPF) states that “to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.”

8.3 The Local Plan seeks to ensure that a choice of homes are available in the borough that will address the borough’s need for homes of different sizes. The London Plan (Policy 3.8 and supporting text at paragraph 3.55) also suggests that houses in multiple occupation play a strategically important part of London’s housing offer, meeting distinct needs and reducing pressure on other elements of the housing stock.

8.4 Policy DM1.2 of the Croydon Plan seeks to protect residential dwellings from conversion where they have a floor space of less than 130sqm or three bedrooms as originally built. The planning history for the property details that the house was originally built as a five bedroom property (see Figure 2 below) and as such, the loss is not contrary to policy.

Design and Appearance

8.5 Chapter 12 of the National Planning Policy Framework (2021) seeks to achieve well-designed places. Policy D3 of the London Plan (2021) states that development proposals should be of high quality, enhancing local context by delivering buildings and spaces that positively respond to local distinctiveness

through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions.

- 8.6 Policies SP4.1 and DM10.1 of the Local Plan state that the Council will require development of a high quality, which respects and enhances Croydon's varied local character and contributes positively to public realm, landscape and townscape to create sustainable communities.
- 8.7 All new and enlarged windows and doors are in keeping with the rest of the property. The introduction of the rooflights will not appear out of place within the wider street scene.
- 8.8 To ensure that the finish is acceptable, details of the new ramp access to the front and rear can be secured by condition.

Residential Amenity of Future Occupiers

- 8.9 Policy 7.6 of the London Plan (2021) states that housing developments should be of the highest quality, internally, externally and in relation to their context and to the wider environment.
- 8.10 Local Plan Policy 10.6 states that the Council will ensure that developments will provide adequate sunlight and daylight to potential future occupiers.
- 8.11 Whereas Nationally Described Space Standards (NDSS) set out standards for accommodation in new dwellings, this does not include HMOs. The Council has published a 'Houses in Multiple Occupation Standards' (2015) document which while does not form part of the development plan, has been used as a guide to determine the acceptability of the accommodation.
- 8.12 The Council's HMO Team were consulted on the application and initially raised some concerns regarding the quality of some of the proposed accommodation, by virtue of lighting or ventilation. Minor alterations were made to the scheme to overcome these concerns (for example including openable roof lights, which due to their scale were not subject to a re-consultation).
- 8.13 It is acknowledged that the primary outlook to Room 5 is into the light well rather than externally. However, the size of this light well has been increased as part of the application process to a depth of 2.5 metres in order to maximise the amount of light into the room. The use of glazed French doors will further assist in allowing maximum light into the room. On balance this is considered acceptable.
- 8.14 As the property is to be occupied by 13 persons, requirements are that at least three separate sets of kitchen facilities would be required. The proposed plans show compliance with this, with the primary kitchen dining room on the ground floor and two kitchens on the first floor, one of which has been enlarged as part

of the application process to enable some seating space. The quantity and size of kitchen provision is acceptable.

		Internal Floor Area (sqm)	
		Requirement	Proposed
Ground Floor	Room 1	10	13.43
	Room 2	10	17.84
	Room 3	10	17.43
	Room 4	12.5	21.52
	Room 5	12.5	16.94
	Room 6	10	13.02
First Floor	Room 7	12.5	17.78
	Room 8	10	15.91
	Room 9	10	12.19
	Room 10	12.5	17.72
Second Floor	Room 11	10	16.80
	Room 12	10	11.82
	Room 13	12.5	13.48

Figure 2 - Accommodation mix and floor area

8.15 The proposed room size standards according to the Houses in Multiple Occupation Standards (2015) are 10 sqm for a single room or 12.5 sqm when having access to en-suite personal hygiene facilities. As shown in figure 3 above, all rooms exceed the minimum floor area.

8.16 Five (5) rooms are shown on plan to benefit from an en-suite with the remaining eight (8) having access to an equal number of separate bathrooms. Provision of this level is acceptable.

8.17 Concerns were raised regarding the effective 'self-contained' nature of the rooms, particularly as the Design and Access Statement confirms that Rooms 2,3,8 and 11 will also have their own dedicated "tea point" facilities in the form of a (W)1236 x (D) 690 pre-fabricated kitchenette units. It was clarified that the

rooms with the “tea point” facilities (rooms 2, 3, 8 and 11) do not have en-suite facilities and are therefore not ‘self-contained’. The remaining rooms which have en-suite facilities, will need to use the communal kitchen/dining facilities and are also therefore not ‘self-contained’.

- 8.18 With regards to sunlight and daylight, an Internal Daylight Assessment, NRG Consulting (July 2021) was submitted in support of this application. Based on the proposed plans, the report measured the Average Daylight Factor (ADF) for each of the rooms to show the amount of relative daylight penetration under overcast sky conditions. It should be noted that the assessment was carried out before the light well serving Room 5 was enlarged which would increase the ADF figure further. All rooms comply with both the BRE Guide and that set within Building Regulations BS 8206-2 in terms of ADF.
- 8.19 There is no requirement to provide external amenity space for a HMO but the property has a large garden to the rear which will provide amenity space.
- 8.20 With this in mind, the accommodation is considered acceptable for future occupiers and complies with Policy 7.6 of the London Plan (2021) and Local Plan (2018) Policy 10.6.

Residential Amenity of Adjoining Occupiers

- 8.21 Policy D3 of the London Plan (2021) states that development proposals should provide secure safe and inclusive environments, secure outlook, privacy and amenity.
- 8.22 Local Plan 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 loss of privacy, daylight, sunlight, outlook or an increased sense of enclosure.
- 8.23 Local Plan Policy DM10.1 specifically references HMO’s and says that where they are proposed, the Council will also consider the effects of noise and refuse collection on the character of an area and will take into account cumulative impact.
- 8.24 The minor nature of the built changes mean that there will be minimal impact on the amenity of the neighbouring properties in this regard.
- 8.25 The majority of the third party comments received relate to the noise and disturbance from the change of use to a 13 bed HMO. While the level of use will be in increase on the existing lawful situation, the existing dwelling is a substantial five bed property which could house a large family which could generate a similar amount of trips and noise. HMO’s are essentially a residential use and there is no evidence to suggest that the additional residents in the

building would cause materially greater harm to other residents in terms of noise disturbance or antisocial behaviour to warrant a refusal of planning permission.

- 8.26 In order to control and manage the use of the HMO, an Outline Management Strategy has been submitted in support of the application. The document provides details of how the site will be managed and the responsibilities of Windrush Housing Association. The document confirms that the rooms would all be single occupancy. An appropriate management strategy will be requirement as part of the HMO Licence, required in line with the Housing Act 2004, however it is also necessary to restrict occupancy on this basis as part of this permission and this can be controlled by condition.

Third party comments were received stating that the management would be remote and unacceptable however the location where the management company would be based is not a relevant planning consideration.

Highways, Parking and Refuse

- 8.27 Policy SP8 of the Local Plan (2018) is in relation to traffic generation, sustainable travelling and parking standards. Local Plan Policy DM30 seeks to ensure that there is an appropriate level of car and cycle parking for developments.
- 8.28 The site has a PTAL of 6b, which is the highest PTAL rating and lies within the East-Inner Controlled Parking Zone (CPZ). East Croydon Station and the Metropolitan Centre lie less than 300 metres to the west. As such, it is considered to be a highly sustainable location.

Parking

- 8.29 A Transport Statement has been submitted in support of the application. Third party comments were received which disputed the accuracy of the parking stress survey which was carried out and reported in the statement. The document has been considered by the Transport Officer and no issues have been raised regarding the survey which was carried out in line with the Lambeth methodology.
- 8.30 It should be noted that no parking is being proposed due to its location and the perceived lack of demand for parking by occupiers of HMOs, primarily due to affordability reasons. However, the Applicant will be required to enter into a legal agreement to remove the right to have access to resident parking permits and contracts in council run car parks.
- 8.31 The proposed plans initially included the retention of one parking space on the hardstanding to the front of the plot however as part of the revisions made to the application, this has been removed. This was due to highway safety concerns and the unacceptable nature of vehicles using the adjacent footway to enable turning on site.
- 8.32 The Applicant suggests that the parking space was to be used for the Housing Association to carry out inspections and as such, the Council is able to permit

one commercial permit for a vehicle needing to visit the site, to park on a side road. This can be secured by a legal agreement. As the only on-site parking space has been removed, the legal agreement should also include provision for the kerb to be reinstated. The landscaping condition proposed also requires details of front boundary treatment to be submitted for approval to ensure that this is appropriate in the context of the frontage of the site to not be used for car parking.

Cycle provision

- 8.33 In line with the London Plan (2021), the proposed development would require 13 long stay secure cycle spaces and two short stay spaces.
- 8.34 Revisions to the application have allowed the provision of secure bike stores for eleven bikes, two secure spaces for adaptable/cargo bikes and two short stay spaces in the form of a Sheffield stand. Although details of the specific type of storage can be secured by condition, the Council is satisfied that appropriate provision can be achieved.
- 8.35 It is acknowledged that the 1.5 metre high cycle storage is located in a prominent visible position within the plot and streetscene. In order to integrate the storage into the surroundings, a green roof is proposed along with a planter to the front which extends 2.90 metres in length. Details of the planter and the proposed landscaping can be secured by condition but are considered appropriate to mitigate the impact on the surroundings.

Refuse/recycling

- 8.36 Policy DM13 of the Local Plan seeks to ensure that the location and design of refuse and recycling facilities are sufficient and treated as an integral element of the overall design, with adequate space for the temporary storage of waste (including bulky waste) materials.
- 8.37 The proposed refuse store will be situated along the eastern boundary at the front of the plot. The store will provide the following:
- 2 x 360l general waste
 - 3 x 360l and 1 x 240 l dry recycling bins
 - 1 x 140l food recycling bin
- 8.38 Provision of this nature is acceptable bearing in mind the proposal. The bin store will be situated on the eastern boundary to the front of the house. They will measure 1.2 meters in height. Full details can be secured by condition to ensure that the appearance of the structure is appropriate within the surroundings and has no adverse harm the character of the area.
- 8.39 Third party comments were received regarding the waste provision. There is no information to suggest that the use of a building as an HMO would generate an

unacceptable amount of waste compared to the existing dwellinghouse nor that the use would result an unacceptable amount of littering in the vicinity. As sufficient provision has been made, the proposal complies with Policy DM13 of the Local Plan

Trees, Landscaping, Biodiversity and Sustainability

- 8.40 In addition to the planter in front of the bike store, three other planters are proposed within the front of the plot and provided that details are secured by condition, are considered an improvement on the existing situation.

Fire

- 8.41 Policy D12 of the London Plan (2021) requires all development proposals to achieve the highest standards of fire safety. Further to this, the GLA has also published a Pre-Consultation Draft on “Fire Safety Policy D12(A)” (March 2021) which provides greater clarity on the policy. It is important to note that while the requirements apply to all development, the Pre-Consultation Draft states that the fire safety information should be “commensurate with the size, scope and complexity of the development.”
- 8.42 The submitted information included the provision of emergency lighting in communal areas, fire doors and firefighting equipment. Considering the nature of the proposal, this is considered acceptable.

Other Matters

- 8.43 All material considerations have been taken into account, including responses to the public consultation. Taking into account the consistency of the scheme with the Development Plan and weighing this against all other material planning considerations, the proposal is considered to be acceptable in planning policy.

Conclusion

- 8.44 The principle of the change of use is acceptable. The existing building is a substantial five bedroom dwelling which could lawfully be used by a large family. The additional uplift to the number of occupants is acceptable in terms of its impact in relation to amenity and transport, considering it would remain as a residential use. Therefore, it is recommended that planning permission be **GRANTED**.