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Mr [REDACTED]
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Our ref: 17/03563/PRE
Date: 13th October 2017

Without Prejudice

Dear Mr [REDACTED]

TOWN AND COUNTRY PLANNING ACT 1990 (as amended)

Site: 11 Briton Hill Road, South Croydon CR2 0JG

Proposal: Demolishing of existing dwelling and replacing with single block of apartments which is containing 9 flats. Proposal is associated with access, parking spaces for 9 cars, integrated cycle storage and refuse store

I write in response to your pre-application enquiry, submitted drawings and our meeting at Bernard Weatherill House on Wednesday 4th October 2017. Comments have been provided on the basis of the plans initially submitted.

The pre-application site is a two storey detached dwelling located on the north side of Briton Hill Road located in the Sanderstead ward. The property sits in a fairly generous plot and has residential properties located at the rear and adjoining the site to the east and the west and is surrounded by well-established and dense vegetation.

Part of the site is located within an area susceptible to surface water flooding, although the site is located within the EA Flood Zone 1. There is also a TPO placed on a beech tree at the front of the site (see point 6 below). There are no other planning designations on the site and the immediate surrounding area is residential in character and the site has a PTAL of 1a.

In terms of recent planning history associated with this site the following is relevant to the site:

- Planning permission (Ref: 93/01039/P) was granted in July 1993 for the erection of a conservatory.

National Policy

At the national level any application would be considered under the National Planning Policy Framework (March 2012). I have no doubt you are fully cognoscente with the NPPF so will not go into further detail here.

Regional Policy

At the regional level the London Plan consolidated with alterations since 2011 (March 2016) is relevant and you should address any requirements as part of your submission.

Key policies relevant to your submission are employment (policies 2.17, 4.4), transport (policies 6.3, 6.11, 6.12, 6.13 and 6.14), design (policies 7.4, 7.5 and 7.6), flooding (policies 5.12 and 5.13), sustainability (policies 5.1, 5.2 and 5.3) and air quality (policies 7.14 and 7.15).

Local Policy

Croydon Local Plan: Strategic Policies (CLP1)

CLP1 was adopted by the Council on 22 April 2013. The plan seeks to provide the basis for the development of Croydon up to 2031, with particular reference to new homes and jobs together with the overall environment. The significant changes proposed in Croydon over the next 20 years will require additional infrastructure such as new/expanded schools, an increase in health facilities, enhanced public transport and flood amelioration measures.

A detailed schedule of infrastructure requirements, entitled the "Infrastructure Delivery Plan", has been produced alongside the CLP1 which identifies the physical, social and green infrastructure needed to support and underpin Croydon's growth through to 2031.

Key policies relevant to your submission are homes (SP2), urban design and local character (SP4), environment and climate change (SP6) and transport (SP8).

UDP Saved Policies

Upon its adoption the CLP1 replaced some of the saved policies in the Unitary Development Plan. However, those that have been not been replaced also remain relevant for consideration of development proposals and include: UD2 (layout & siting), UD3 (scale & design), UD6 (safety & security), UD7 (inclusive design), UD8 (protecting residential amenity), UD15 (refuse storage), T2 (traffic generation), T4 (cycling), T8 (parking), H2 (housing) and EP1 (control of potentially polluting uses).

CLP1.1 and Croydon Local Plan: Detailed Policies and Proposals (CLP2)

As you should be aware, CLP1.1 (partial review of CLP1) and CLP2 are nearing formal adoption and the weight to be attributed to the policies will increase. The public examination took place between 16th May and 31st May 2017. We have now (23rd August) opened consultation on the Main Modifications, changes which the Inspector considers are necessary to make the plan sound for adoption. We are expecting the Inspector's decision letter in late autumn of this year.

Policies of most relevance to your submission in CLP2 are DM11 (design and character), DM14 (refuse), DM24 (development and construction), DM25 (contamination), DM26 (SuDS and flood risk), DM30 (sustainable transport and reducing congestion) and DM31 (car/cycle parking).

Planning considerations:

The main issues associated with this pre-application enquiry are as follows: 1) The principle of the development; 2) Impacts of the proposal on the character and appearance of the surrounding area; 3) Impacts on the residential amenities of the adjoining properties; 4) Housing, mix and standards; 5) Parking and highway issues; 6) Trees and landscaping impacts; 7) Surface water issues; 8) Sustainability issues; and 9) CIL requirements. These shall be dealt with in turn:

1. Principle:

The site is currently occupied by a large unit and would not result in the loss of smaller family units which the Council has a presumption against losing and would be seeking to protect in accordance with Policy H11 of the UDP saved policies 2013.

As such there would be no objection to the principle of the provision of residential units at the site as the proposal would see the provision of additional dwellings on the site, within an established residential area. There would be no loss of protected uses on the site and the existing dwelling is not subject to any statutory protection. Therefore the principle can be acceptable, subject to more detailed consideration of the other material planning considerations.

2. Character and appearance:

The current proposal appears slightly bulky in terms despite its central position within the site. With the provision of the nine units at this site in my opinion this is pushing the boundaries of the envelope and in terms of density (see point 4 below) should be reduced in order for the scheme not to be considered an overdevelopment. As mentioned at the meeting there are concerns in respect the impacts on the adjoining residents (see point 3 below) and ideally the scheme should be brought forward towards road slightly.

As discussed, it is not recommended to provide rear balconies on the upper storeys. There was reference to an alternative design through the incorporation of a brick base and obscure glazing above. This would be considered as substandard outdoor space, and as an alternative you should incorporate the use of Juliet balconies instead, which

may also mitigate overlooking issues of the rear 1st and 2nd floor balconies by proposing Juliette doors.

In regard to the front elevation the left double gable end is not encouraged, and you are encouraged to match this side with the right side of the front elevation, creating a symmetrical front elevation with balconies on both sides. The additional front door on unit 3 should also be removed from this elevation as it detracts from the main front entrance. Furthermore the front entrance should be increased in prominence to make it more of a focal point. Whilst it is acknowledged that this would be used to access the private garden this may be better served on the flank elevation in order not to compete with the front door for the other units.

The location of the refuse and cycle storage within the host property is again supported in general, however these should be swapped with the refuse facility to be closer to the front elevation

There was an issue in terms of the internal layout in particular at the second floor (Unit 9) has no main bathroom with all occupants having the use the en-suite on the master bedroom, you will need to providing a main accessible bathroom for the remaining bedrooms. Window reveals are to be encouraged and again slim frame windows are supported. Ideally there should be larger windows (glass area) are supported to enable more natural light into a property.

In respect to the current materials proposed the composition of tile and brick on the elevations appear acceptable. Brick detailing such as lintels and patterning are positive regarding site context. Such materials are encouraged to be of high quality and durability and all the materials must be specified at full planning application stage. Samples can be requested in doubt of material quality.

As with some of the other schemes proposed further integration of soft landscaping and vegetation into the car park area was agreed. You should have some regard to integrating sustainable drainage into the car park area, also in relation to the flood risk area south east of the site (see point 7 below).

The collaboration with a landscape architect, or similar, for the development of the landscape design is supported to expand on interesting spaces and variation of plant/tree species for the outdoor amenity space. This includes the boundary treatments and the detail of how the subdivided plots of gardens space will function successfully with the communal areas.

The footpath leading to cycle and refuse storage (west elevation) may be less enclosed by a hedge treatment. A more permeable application of vegetation could be applied here to create a more open experience of space. It is advised that a landscape statement specifying tree/plant species, hard landscaping materials and external furniture is provided at full planning stage.

3. Residential amenities of adjoining occupiers.

Generally the proposal is well sited within the middle of the plot providing a good degree of space between the adjoining properties on Britton Hill Road and the rear of

the properties in Hook Hill. Nevertheless, the increase in the bulk of the development is a concern in respect to the visual impact on the surrounding properties, with specific regard to number 13 Briton Hill.

Whilst it is noted that the front building line is similar to that of 13 Briton Hill Road (and this should be maintained as far as possible), it is advised that the building could be pushed forward to mitigate the visual impacts of the bulk to the rear, providing that the scheme is sufficiently set back from the road, similar to the other properties along Briton Hill Road. Although this could have implications on the parking provision at the site currently located at the front of the property.

In regard to the property at number 9, this has a bedroom window at the first floor level and this is a single aspect window. Whilst it acknowledged that there are no windows in the flank elevations, there are balconies to the rear of the site, which could provide actual and perceived levels of overlooking in this locality at this site. Furthermore, given the proximity to the rear of the property in Hook Hill it is proposed that these elements are removed from the scheme, as stated above these could be replaced with simple Juliet balcony.

In general terms where windows are positioned facing existing properties these should ideally not serve habitable rooms and should be positioned in excess of 20m from these properties, it appears that this has been achieved between the proposed block and the properties located at the rear in Hook Hill albeit that they are located further up in terms of topography and as such this could be acceptable.

You should note that the increase in the overlooking of the gardens and indeed a perception of overlooking which would both be material considerations of a future planning application. However, the retention of the existing and well established vegetation could mitigate the loss of privacy experienced at these properties, and the proposed landscaping provision could further enhance this.

The LPA seeks to protect the residents from loss of amenity in terms of noise and light pollution. It is recognised that the additional units will have an increased pattern of activity and noise generation when compared to the existing residential use at the site. It is considered that subject to suitable conditions that there would not be significant detrimental impacts upon the living conditions of surrounding residents.

4. Housing, mix and standards:

I note that the development contains a number of three 3 bed units which could provide family accommodation that the Council is looking to provide. However, the London Plan currently suggests that a density of between 150-200 hr/ha would be applicable in a suburban environment with a low PTAL rating. Currently the density is 240 hr/ha and this is considered an overdevelopment of the site. The mix and/or number of units provided on site would need to be reduced.

The LPA would be seeking all new housing to meet the nationally described space standard (NDSS) from a review of the units proposed it would appear that these meet the required standards (see below).

Unit Numbers	Size	Area (sqm)	NDSS (sqm)	Complies
Unit 1	3B 4P	75	74	Yes
Unit 2	3B 4P	74	74	Yes
Unit 3	3B 4P	74	74	Yes
Unit 4	3B 4P	78	74	Yes
Unit 5	2B 3P	66	61	Yes
Unit 6	3B 4P	71	74	Yes
Unit 7	2B 3P	67	61	Yes
Unit 8	2B 3P	64	61	Yes
Unit 9	2B 3P	63	61	Yes

The LPA would be seeking all new housing to meet the nationally described space standard (NDSS) and the scheme should meet with the technical requirements in terms of internal requirements and should incorporate a minimum ceiling height of 2.5m for at least 75% of the gross internal area is strongly encouraged to address overheating and ensure appropriate ventilation and daylight.

Any further scheme should also meet with the Building Regulation Requirement M4 (2) 'accessible and adaptable dwellings', in order that this scheme would be consistent with policy SP2.5 of the CLP1.

5. Parking and highways:

The scheme is located in an area with PTAL 1a of which is very poor however, there is an off street provision for cars on a 1:1 ratio would be acceptable and in line with the Councils sustainable transport requirements. The plans should provide a disable space and this should be located close to the entrance and ideally the provision for an electric vehicle charge point should be incorporated.

The Strategic Transport team have indicated that the access appears to be shown as 4.2m narrow as such it would be helpful if the width of the access route is confirmed by the applicant as part of any application. Also you will need to demonstrate how the operation of the access route would be improved for the purposes of access and egress vehicular movements as a result of the intensification of use by vehicles associated with the new residential dwellings. This should ideally be shown on its own plan highlighting this as a swept path.

The following documents should be provided to assist Strategic Transport in its future assessment of the above application:-

- Scaled drawings detailing the Cycle storage facilities
- Details of Refuse storage, collection and recycling arrangements for the residential development.
- To-scale and dimensioned parking layout and access drawings. The drawings should demonstrate the capability of the car park to accommodate parking manoeuvres of all vehicles that may use it.
- The site access should comply with Highway design and visibility splay standards for all vehicles, which must access and exit the site in forward gear.

- A Demolition / Construction Logistic Plan (including a Construction Traffic Management Plan compliant with Chapter 8 of the Road Signs Manual for temporary Works)

The incorporation of the refuse and cycling storage within the property is supported, however further information on how refuse and recycling material will be presented be necessary as part of any planning application. Overall, Strategic Transport has no objection in principle to the above pre-application provided the above issues are addressed.

6. Trees and landscaping:

There are no arboriculture objections to the proposed development. However, it appears that there is a TPO (ref; 8, 1982) registered to the property, but I can confirm the tree is not situated in the ground anymore. The records suggest that it was identified as having a spilt trunk in 1990. It appears that no replacement was planted, as such the LPA will arrange for the TPO to be revoked.

However it is recommended that 2 x new trees be included within the landscaping scheme to help soften the approach of the new build. Should an application be submitted it is expected that a full landscaping scheme, tree survey and a tree removal and retention plan be provided.

7. Surface Water Drainage Issues

Part of the site is located within an area susceptible to surface water flooding, in order to validate the application the development will require incorporation of sustainable urban drainage systems (SUDs) which must be specified in any submission. These are to achieve Greenfield run-off rates and ensure surface water management and should include, but not limited to, addressing the following issues in order of preference:

- Discharge surface run-off into the ground
- To a surface water body
- To a surface water sewer, highway drain or another drainage system
- To a combined sewer

You are advised to consider using permeable paving where appropriate and to incorporate green roofs / living walls wherever possible so as to reduce the impact from surface water runoff. I have enclosed a copy of the Lead Local Flood Authority general flood advice for your records

8. Sustainability:

Any proposed development should make the fullest contribution to minimising carbon dioxide emissions in accordance with the London Plan energy hierarchy (Be Lean; Be Clean; Be Green). You are required to demonstrate that sustainable design standards

are integral to the proposal, including construction and operation, and ensure that they are considered at the beginning of the design process. Residential schemes require:

- 19% reduction in CO2 emissions over 2013 Building Regulations. Prior to first occupation we require a copy of the EPC certificate(s) as evidence that the target has been met.
- The scheme shall be designed and built so mains water consumption would meet a target of 110 litres or less per head per day

9. Community Infrastructure Levy:

In accordance with London Plan Policy 8.3, the Mayor of London has introduced a London wide Community Infrastructure Levy (CIL), to be paid on the commencement of new development in Greater London in relation to planning applications determined. The charge for Croydon is currently £25.94 per square metre of additional floorspace. In addition to the Mayoral CIL development proposals would also be subject to Croydon's Community Infrastructure Levy (CIL). The charge is currently £150.91 per square metre of additional floor space. Further information is available at:

<http://www.croydon.gov.uk/planningandregeneration/croydons-planning-policy-framework/community-levy/>

Summary:

Overall, the scheme to provide additional residential units at the location would be acceptable in principle. Subject to the alterations to the scheme suggested at the pre-application meeting and in the letter above there would be scope for a development of this type here. At this stage, it is considered that the proposal would be detrimental to the character area given the slightly bulky and overdeveloped nature of the proposal which should be reduced if the scheme is to receive officer's support. Thus as it currently stands the scheme would not receive a favourable decision.

However, subject to the amendments and alteration suggested at the meeting and highlighted above these concerns could be mitigated. Given that there are a number of alterations sought as part of this pre-application scheme, it may be prudent to submit a further pre-application submission prior to any full application. This would be encouraged to ensure that any application submitted can be supported; we will not entertain amendments and dialogue during the course of a formal planning application. We would strongly advise that any application submitted is in the form of a full planning application rather than an outline scheme.

Any given advice by Council Officers from pre-application enquiries does not constitute a formal response or decision of the Council with regard to future planning consents. Any views or opinions expressed are given in good faith and to the best of ability without prejudice to formal consideration of any planning application, which was

subject to public consultation and ultimately decided by the Council. You should therefore be aware that officers cannot give guarantees about the final form or decision that will be made on your planning or related applications.

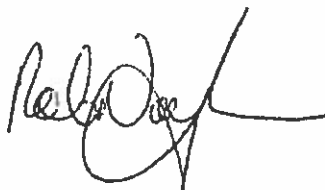
Should you wish to proceed, planning application forms are available from the Council's website or from Bernard Weatherhill House, and these should be completed and submitted together with relevant detailed drawings and any other appropriate information necessary for the Council to determine the application. It normally takes approximately 13 weeks for a decision to be made for a Major development application and 8 weeks for all other applications. If you wish to pursue this proposal further, then it is imperative that the following information is submitted with any planning application, in addition to detailed, scaled, drawings of the development that should also show the relationship with adjoining properties:-

- 1) Completed application forms
- 2) Ownership certificate and notice
- 3) Agricultural holdings certificate
- 4) Site location plan (outlined in red)
- 5) Full plans and elevations including contextual street scene information
- 6) Hard and soft landscaping plan
- 7) Tree Survey
- 8) Design & Access Statement
- 9) Transport Statement
- 10) SUDs details (for validation purposes)
- 11) The appropriate fee

I trust this gives you sufficient information to consider further. You will nevertheless appreciate that the above comments are an informal officer opinion only and made without prejudice to any final decision that the Council may wish to take in respect of any formal planning application that may be submitted.

In the meanwhile should you have any further concerns or enquiries please do not hesitate in contacting me.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Robert Naylor', with a stylized flourish extending to the right.

Mr Robert Naylor
Deputy Team Leader

Enc.

