

To:

.....Council
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15th April 2023

Dear Sir/Madam

Re: Objection to Application Reference:

This letter is written on behalf of our client, a resident local to the site at.....('the Site'), the subject of planning application reference.....

This letter comprises an objection regarding application reference.....for the erection of 5no. two storey semi-detached dwellinghouses to rear of site, with on site parking, bin storage, and associated works at('The Proposal').

The Property is located at...., South Croydon, London, (the Property).

The Site is located on the northern side ofRoad, with immediate frontage to the highway. The site is bounded to the north by a service road with woods and playing fields ofSchool beyond, to the east by the grounds ofRoad, to the south by the host dwellinghouse and to the west by a vacant plot rear of Road.

The Site is located within Flood Risk 1 (lowest probability of flooding) and identified as Ptal 3. The Site is suitably located to all key services to include a hospital, health surgeries, primary and nursery schools, shops, faith meeting venues with accessible train services and bus stops routed alongRoad and Road. The Site is therefore considered to be sustainably located.

We have listed separate reasons for objection to the Application under appropriate headings.

The main considerations for this objection letter are:

- Land Use Principle
- Standard of Accommodation
- Design
- Trees and Biodiversity

Land Use Principle

When considering new housing developments, Chapter 5 of NPPF 'Delivering a sufficient supply of homes' states that small and medium sites can make an important contribution to meeting the housing requirement of an area'.

London Plan 2021 (LP) Policy GG4 "Delivering the homes Londoners need" states that those involved in development must create mixed and inclusive communities, with good quality homes that meet high standards of design and provide for identified needs, including for specialist housing".

Policy SP2.1 of the Croydon Local Plan 2018 (CLP) applies a presumption in favour of development of new homes. Applications for residential development must meet the requirements of Policy SP2 and other applicable policies of the development plan. Policy DM1 permits housing development within existing built up areas provided it does not conflict with the aim of respecting the character of residential areas.

CLP policy DM10.4e outlines that in the case of development in the grounds of an existing building which is retained, a minimum length of 10m and no less than half or 200m² (whichever is the smaller) of the existing garden area is retained for the host property, after the subdivision of the garden.

LP policy H1 outlines that boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites, especially the following sources of capacity: a) sites with existing or planned PTALs of 3-6 or which are located within 800m distance of a station or town centre boundary.

While the application site is within a PTAL of 3; it is outside of an 800m distance from a station or town centre boundary. While this would not preclude the site from coming forward for intensification, it is not a site that is considered to be optimal for increasing its housing capacity.

Standard of Accommodation

LP policy D6 states that housing developments should be of a high quality and provide adequately sized rooms with comfortable and functional layouts. It sets out minimum Gross Internal Area (GIA) standards for new residential developments. CLP policy SP2.8 also deals with quality and standards.

Houses 3 and 4 would face the side elevation of house 2, which would encompass the views from front habitable rooms of these two properties, with a distance of 3.3m. By comparison to the previous application, there was a space of 4.7m between the side elevation and the front building line of the two houses at the rear, and additionally, the front habitable windows of houses 3 and 4 were on the outer sides of the house and would have views either side of house 2. The proposal in this current scheme would block the views and would result in a sense of enclosure, poor quality outlook, and due to the southern orientation of house 2 in relation to houses 3 and 4, would likely detrimentally impact on light, in a way that would have been avoided in the previous application.

Design

LP Policy D3 states development should enhance 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. It should incorporate the highest quality materials and design appropriate to its context.

CLP Policy SP1.1 indicates that the Council will require all new development to contribute to enhancing a sense of place and improving the character of the area. CLP Policies SP4.1 and SP4.2 of also require development to be of a high quality which respects and enhances local character.

CLP DM10.1 Proposals should respect: a. The development pattern, layout and siting of the area it is located. b. The scale, height, massing, and density; c. The appearance, existing materials and built and natural features of the surrounding area; the Place of Croydon in which it is located.

The proposal would involve the creation of a mews style development to the rear of the site, accessed viaRoad. It would produce 5no. dwellings, the closest dwelling to the existing property is 41m. The proposed dwellings would be 2 storey with accommodation in the roof.

The wider area generally consists of detached and semi-detached dwellings with longer back gardens that abut the SINIC; there are no other backland developments within close proximity to the application site. The character on the adjacent side of the road to the property is slightly different; this consists of mainly of denser housing in a tighter space, with flats intermingled.

CLP policy stipulates that proposed developments should respect the character of the area. It is considered that although the southern side ofRoad has a different character to the northern side; the north side has a relatively consistent pattern. Regard has to be given to the prevailing spatial characteristics when considering backland development like this in conjunction with the local plan policy.

The new dwellings would appear cramped and incongruous with the context of the northern side ofRoad. The houses along this side ofRoad are set in generous plots whilst the proposed dwellings and the existing dwelling onsite would have considerably smaller plots. Given this context, it is considered that the proposal wouldn't respect this character.

The development would result in a cramped form of development, which was described in the section above (Standard of Accommodation). The proposal would not conform to the pattern of development for the wider area, as there are no other examples of backland development along this side ofRoad. It would therefore impact on the spatial characteristics of the area.

The loss of green/open character typical of this suburban area and the loss of the sense of openness and the verdant rear garden spaces normally typical of the rear plots in this area would not contribute to the suburban character of the area. The quantum of hardstanding is not usual in this context; this is especially significant as the property abuts a SINC. It's noted that this was mentioned as a concern in the last application; however, the latest iteration has increased the quantum of hardstanding by approximately 100sqm, therefore this reason for refusal has not been overcome. The proposal would not respect the natural features of the area.

Existing Dwelling

The proposed dormer, which would be on the side/hipped section of the roof, would be 4.7m in length. It is considered to be a large addition which would be highly visible and incongruous on the roof line.

Trees and biodiversity

LP Policy G7 states that wherever possible existing trees of value should be retained in development proposals. CLP Policy DM27 seeks to incorporate biodiversity within buildings and development site and Policy DM28 seeks to protect trees in the borough.

The previous application was refused for the following reason: The proposal, by virtue of the significant loss of trees on site and the lack of information relating to replacement planting and a landscaping strategy, would result in a detrimental impact on the borough's trees and in a substandard quality of landscaping, as well as a net loss of biodiversity, contrary to policy G7 of the London Plan (2021) and policies DM10.5, DM10.8 and DM28 of the Croydon Local Plan (2018).

The proposal includes the removal of a number of trees throughout the site. The arboricultural report and Tree Protection Plan demonstrates that 17no. trees would be removed (table 2 of Arboricultural Impact Assessment Report). To compensate for the loss of these trees, 1no. trees will be planted, specifically to replace the loss of trees T2 and T3. Additionally, new tree planting is proposed along the rear and side boundaries, to mitigate the trees being removed. This will form part of the landscaping proposals; the Design and Access Statement sets out that a landscaping strategy and planting plan will be submitted at discharge of condition stage. It is also stated that a 5-year plan is constructed and submitted with the new landscape proposals, however, the application does not outline what this may be or that the significant loss of the trees can be adequately replaced.

While the documents outline that the trees are low quality, the site abuts a SINC, and the proposal would involve a significant clearance to facilitate development which is unbalanced with replacement trees or a net gain of biodiversity. The plans do not demonstrate where the replacement tree planting will occur.

Conclusion

The proposed form, design, and siting of the proposed buildings would result in an incongruous and cramped development, which would not conform to the pattern of development and would be significantly detrimental to the character and appearance of the immediate locality. Additionally, the proposed dormer roof of the existing property would also be incongruous, and over dominant. This is contrary to Policy DM10 of the Croydon Local Plan 2018 and Policy D3 of the London Plan 2021.

The proposed development would provide substandard accommodation by virtue of the poor quality outlook, sense of enclosure, and inadequate light for houses 3 and 4, as a result of the close proximity and siting of house 2, contrary to Policy D6 of the London Plan (2021) and Policies SP2.8 and DM10 of the Croydon Local Plan (2018). Due to the reasons above we propose that the Application be refused. Please acknowledge receipt of this objection by return.

Yours Sincerely,

Planning Voice

Chartered Town Planners

www.planningvoice.com

Example