

Mr Steve Gratrix
66 - 68 High Street
Southend-on-sea
Essex
SS1 1JF
EMAIL ONLY

Our ref: 23/00742/PREAPF
Your ref: N/A
Date: 04/07/2023
Telephone: 01702 212137
Email: oliverhart@southend.gov.uk

Dear Mr Gratrix,

Town & Country Planning Act 1990 (as amended)

Site address: 66-68 High Street, Southend-on-Sea, Essex, SS1 7JF
Proposal: Proposed two storey roof top extension to accommodate residential apartments

Submitted drawings and documents:

- 010 RevA
- 011 RevA
- 012 RevA
- 013

Thank you for your pre-application enquiry first received on 03.05.2023. Further to your request for pre-application advice which comprised a virtual meeting on 21.06.2023, I can offer you the following written comments. For clarity, my comments are based on the submitted drawings and documents listed above.

1 Site and Surroundings

- 1.1 The application site is occupied by a mid-terrace three-storey building comprising established commercial premises on the east side of the High Street. The street scene in this part of the High Street is characterised by similar commercial uses.
- 1.2 The site is opposite Weston Road. To the rear of the site (east) is a service yard accessed from Chichester Road, which is bounded by commercial premises and currently serves McDonalds and Marks and Spencer.
- 1.3 The site is located within a Primary Shopping Frontage as identified on the policies map of the Development Management Document and is within the High Street Policy Area as designated in the Southend Central Area Action Plan. The application site is attached to a Frontage of Townscape Merit.

2 The Proposal

- 2.1 The proposal includes the erection of a two-storey extension above the existing building to accommodate 8no. additional residential units.

- 2.2 The units would comprise 6no. studio style units 39sqm in area and 2no. two-bedroom units, 62sqm in area.
- 2.3 Other alterations include changes to the existing shop front to provide a separate entrance to the units and provide a new stairwell up to the units.

3 Validation

- 3.1 Before the formal submission of an application the applicant is advised to have regard to the Local Planning Authority's validation requirements list, which is available here:

https://www.southend.gov.uk/downloads/download/258/local_validation_list

4 Relevant Planning History

- 4.1 Whilst there are historic applications for this site, none is directly relevant to this pre-application enquiry.

5 Planning Policy Summary

- 5.1 The most relevant policies are summarised below:

- The National Planning Policy Framework (2021)
- Planning Practice Guidance and National Design Guide (2021)
- Technical Housing Standards – Nationally Described Space Standard (2015)
- Technical Housing Standards Policy Transition Statement (2015)
- Core Strategy (2007): Policies KP1 (Spatial Strategy), KP2 (Development Principles), KP3 (Implementation and Resources), CP2 (Town Centre and Retail Development), CP3 (Transport and Accessibility), CP4 (The Environment and Urban Renaissance) and CP8 (Dwelling Provision)
- Development Management Document (2015): Policies DM1 (Design Quality), DM3 (Efficient and Effective Use of Land), Policy DM5 (Southend on Sea's Historic Environment), DM6 (The Seafront) DM13 (Shopping Frontage Management outside the Town Centre) and Policy DM15 (Sustainable Transport Management)
- Southend Central Area Action Plan (2018) (SCAAP) Policies DS1 (A Prosperous Retail Centre) DS5 (Transport, Access and Public Realm) PA1 (High Street Policy Area Development Principles)
- The Southend-on-Sea Design and Townscape Guide (2009)
- The Essex Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) SPD (2020)
- Community Infrastructure Levy (CIL) Charging Schedule (2015)

- 5.2 Please note that any planning application will be considered and assessed against all national and local planning policies relevant at the time of submission.

6 Appraisal

Principle of development

- 6.1 Paragraph 119 of the NPPF states: "Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions." Furthermore, the NPPF requires development to boost the supply of housing by delivering a wide choice of high-quality homes. Paragraph 86 (f) of the NPPF states that planning should "recognise that residential development often plays an important role in ensuring the vitality of centres

and encourage residential development on appropriate sites”. Paragraph 120 (e) states that planning decisions should “support opportunities to use the airspace above existing residential and commercial premises for new homes. In particular, they should allow upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well-designed (including complying with any local design policies and standards) and can maintain safe access and egress for occupiers.”

- 6.2 Building heights in the vicinity are varied such that no objection is raised in principle to the provision of two additional storeys at the site.
- 6.3 The development would retain the ground floor premises in a use which supports employment opportunity and a high street type frontage.
- 6.4 It is considered that the proposal to extend the upper floor to provide residential units would accord in principle with the above development plan policies, which recognise that providing additional residential uses into town centres can enhance their vitality.

Design and impact on the character and appearance of the area

- 6.5 The NPPF requires new development to respond positively to its surroundings. The importance of good design is reflected in Policies KP2 and CP4 of the Core Strategy and also in Policies DM1 and DM3 of the Development Management Document. These policies seek to maintain and enhance the amenities, appeal and character of residential areas.
- 6.6 Whilst no objection is raised in principle to the provision of two additional storeys owing to the varied heights of neighbouring buildings, the development would nonetheless add significant scale and bulk to the main building which would not be suitably offset by the limited set back of the forwardmost projecting element. The set back for the forwardmost projecting element as shown would be likely to be found to be acceptable were the scheme for one additional storey. If two additional storeys are proposed, the set back would need to be akin to a 5-6m set back from the buildings frontage as demonstrated by the recessed element shown on the plans.
- 6.7 The proposed design is contemporary in nature but fails to integrate suitably with the host building which is characterised by very strong proportionality, split into 3 segments with very wide windows. The proposed development fails to reference this at all. This strong proportionality is picked up in many of the adjacent buildings which includes 70-80 High Street which is designated as a Frontage of Townscape Merit such that a sympathetic design that references such characteristic features is even more important here.
- 6.8 The absence of any flats facing forward onto the High Street seems a waste of all that glazing which is presently serving stairwells and corridors. The layout of the units facing south onto the blank flank wall of the M & S site to the south also raises significant amenity concerns from a light and outlook point of view, particularly for those lower level units where the separation is only around 4m. Moreover, if you were to alter the layout potentially, with front and rear units, you would also be future proofing the development against any future potential development to the roof of the M & S.

Impact on future living conditions

- 6.9 Room layouts have not been provided such that full comments on this matter cannot be provided. All new dwellings need to comply with the Technical Housing Standards – Nationally Described Space Standard (NDSS) and have useable private amenity space.

- 6.10 As mentioned in the design sections, I have concerns about the light and outlook for the proposed units which needs to be addressed, most likely by a re-shuffle in the design and layout of the scheme.
- 6.11 With regards to noise and disturbance, I note neighbouring plant equipment and a service delivery yard to the rear. On this basis, any formal application would be expected to be supported by a noise impact assessment demonstrating that the development would not be unduly disturbed by deliveries or operation of plant equipment – I can supply details of Environmental health colleagues if you would like to have a discussion prior to carrying out any such assessment.
- 6.12 The proposed units are positioned at a pretty high level and accessed only by a stairwell. It was discussed at the meeting about the potential for lift access and the associated benefits for future occupants that this would bring. Furthermore, the possibility of utilisation of the rear stairwell which is presently open to the elements was also discussed. This would be unacceptable to living conditions of future occupiers although incorporation of a canopy over may mitigate some of the associated concerns.
- 6.13 I also note that no waste or cycle storage is shown on the proposed plans; For a development of 8 units, the requirements are 4no. 1100L Eurobins (2no. for general waste and 2no. for recycling). This would need to be positioned in a convenient location and enclosed at ground floor.
- 6.14 For bicycles, the requirement is for a minimum of one enclosed and secure parking space per unit and again, would need to be positioned in a convenient location. Without lift access, this would need to be at ground floor.

Residential Amenity Impacts

- 6.15 Local and national planning policies and guidance seek to secure high quality development which protects amenity. Policy DM1 of the Development Management Document specifically identifies that development should protect the amenity of the site, immediate neighbours, and surrounding area, having regard to privacy, overlooking, outlook, noise and disturbance, visual enclosure, pollution, and daylight and sunlight. Further advice on how to achieve this is set out in the Council's Design and Townscape Guide.
- 6.16 There are no neighbour residential amenity concerns as the site is sufficiently removed from neighbouring residential premises.

Traffic and Transportation Issues

- 6.17 No parking is proposed as part of the development. Whilst due regard is had to the sustainable location of the development, it is up to you to provide a transport statement to set out this argument in any submission documents.

Sustainable use of energy and water

- 6.18 On site renewable energy sources should cover at least 10% of the energy needs of the proposed dwellings.
- 6.19 Measures will be required to be implemented to limit water consumption to 105 litres per person per day.
- 6.20 The details for renewable energy sources and measures to limit the water consumption should preferably be submitted with the application.

Developer contributions

- 6.21 The application would be RAMS and CIL liable.
- 6.22 RAMS – requires a payment of £156.76 per dwelling to be paid prior to any decision being issued. This is to mitigate the impact of the development in terms of additional recreational pressure on habitat sites.
- 6.23 CIL, the site is within Zone 2 where a charge of £40.96 per square metre is currently chargeable.
- 6.24 The submission of the CIL Additional Information Requirement Form is a validation requirement.
- 6.25 The CIL Assumption of Liability form should also be submitted as soon as possible, preferably with the application, in order to minimise the delays after an application is determined.

7 Conclusion

- 7.1 Concern is raised with the design of the development which as proposed, would appear unduly bulky and incongruous, given that there is insufficient set back for a two storey roof extension which also fails to integrate suitably with the host building. The layout proposed also raised amenity concerns for future occupants. As proposed the development would unlikely be supported by officers of the Local Planning Authority.

Please note that any opinion given in this letter is based upon the information provided and is that of an officer of Southend-on-Sea City Council as the Local Planning Authority for the City. It does not necessarily reflect the view that might be taken by the Council itself. Consequently, any opinion expressed will not bind the Council and is made without prejudice of any formal decision of the Council on this matter.

You are advised that the development will likely require approval under the Building Regulations if deemed acceptable and planning permission is granted. The Council's Building Control Service will be keen to engage with you to provide details of their range and quality of service. They can be contacted on 01702 215004 or alternatively you can visit our website: http://www.southend.gov.uk/info/200011/building_control.

I hope this letter and the information contained in it is of assistance to you.

Sincerely yours

Oliver Hart
Principal Planner

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