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Validation Checklist Consultation Comments – Representation from the Monks Orchard Residents' Association.

Dear Ms Bharakhada

Further your email of 1st November 21 we would like our following representations to be considered as a response to the Validation Checklist Consultation which closes on 30th November 21.

Site Location Plan

All applications require an Ordnance Survey based site location plan, usually at a scale of 1:1250, clearly showing the boundary of the land outlined in red and any adjoining land that the applicant owns outlined in blue. The site area red line should go around what is called the planning unit. This is all the land that is owned, or occupied, for a single purpose and includes all areas where works are proposed as part of the planning application. Examples include:

- For an extension to a factory, it would be the whole site, including parking/turning areas, buildings, external storage etc.;
- For an extension to a house it would include the whole of the residential plot including the front and rear gardens;
- For backland sites, it would include the land providing access to the public highway.
 - ❖ In addition, should indicate, length (m), kerb to kerb width (m) (over the full length), turning head dimensions (radius m) and sight lines of access to the Backland Site, ingress and egress from the highway.
 - ❖ Distance (m) from existing or new Fire Hydrant to furthest dwelling.
 - ❖ Swept Path illustrations showing entrance requirement from highway (Width of highway) for delivery Pantechonics, Delivery vehicles, Fire Tenders and emergency vehicles into development site via access drive.

**Representing, supporting and working with the local residents
for a better community**

Block Plan

Applications that involve building or engineering works or changes of use need a plan at an appropriate scale, usually 1:200 or 1:500, showing the boundaries of the site and all existing and proposed buildings, structures, hard surfaces etc. within it. Please make sure you include details on:

- Any existing or proposed vehicular or pedestrian access(es) to the site.
- Any public rights of way within the site.
- Vehicle parking within the site (including cycles) and provision for loading/unloading.
 - ❖ **Vehicle Swept Paths for ingress and egress to all Parking Bays (with all other bays occupied).**
- Provision for access to any building and parking for blue badge holders.
- Arrangements for refuse storage, including separate storage of recyclable waste and bulky goods storage area.
- The position, species and spread of any existing trees (marking if any are to be felled.)
- Any adjoining properties to show the relationship between them and the application site.
 - ❖ **Projection of existing Building Line set back from road/footpath on all sides fronting or flanking adjacent to highway or footpath.**

For Residential Sites:

- ❖ **The Site Area in sq.m. and hectares**
- ❖ **The Floor Area Ratio (GIA m²/Site Area m²).**
- ❖ **The Build Area Ratio (Build Footprint m²/Site Area m²).**

Detailed Plans, Drawings and Photographs

Applications that involve building works require:

- Plans of the existing and proposed floors of the building at an appropriate scale, usually 1:50 or 1:100, and indicate which parts of the building are to be used for which purpose.
- Street elevations **and rear elevations** showing the proposal **in relation to neighbouring buildings** (note the importance of accurate adjoining properties further to Choiceplace Properties Ltd v Secretary of State for Housing Communities And Local Government 2021).
- For all major development contextual elevations and 3D visualisations are required to show the development in its context with its surroundings.



- Existing and proposed drawings of all sides of the exterior of the building/structure at an appropriate scale, usually 1:50 or 1:100. Please make sure you include the make, type and colour of external materials (walls, roofs, windows, doors, rainwater goods, amenity spaces etc.).
- Photographs of the application site and relationship with adjoining premises.

a site is sloping, where neighbouring land is at a different height or where land levels are proposed to be changed, drawings of sections through the site showing the relationship to adjoining properties or land is required. Long and short cross section(s) through the existing and proposed building(s), as well as any vehicles access(s) should be provided as well as sectional drawings to show both existing and finished levels and any gradients to vehicle and pedestrian accesses. For applications involving new buildings, site levels within the site and in relation to neighbouring buildings or sites should be provided.

Applications that involve engineering works require plans of those works (existing and proposed if necessary) at an appropriate scale, usually 1:50 or 1:100.

Applications for changes of use should include plans of the existing and proposed floors of the building at an appropriate scale, usually 1:50 or 1:100, and you should indicate which parts of the building are to be used for which purpose.

Where existing buildings are proposed to be demolished it is necessary to show comparative drawings indicating the footprint and elevation(s) of existing buildings compared to proposed buildings.

❖ Footprint of existing (m²)

Design and Access Statements

Design and Access Statements (DAS) are required to be submitted with any application for:

- Major developments,
- Applications for one or more dwellings or a building or buildings where the floorspace created is 100sq.m or more within a “designated area” such as a Conservation Area
- Intensification schemes proposing 5 or more new build homes
- Listed building consent

A DAS should be proportionate to the scale of the development. The document should be very visual, using diagrams sketches, plans and photographs to provide the necessary explanations and descriptions wherever possible and appropriate. The DAS should address the following aspects of the proposed development.

- Amount,
- Layout,

- Scale,
- Landscaping,
- Appearance, and
- Accessibility (including for refuse collection, disabled step-free and fire)

A DAS must demonstrate the steps taken to appraise the context of the development and how the design of the development takes that context into account in relation to its proposed use and each of the above aspects. The purpose of DAS is to explain how you have considered the proposal and to ensure that you understand what is appropriate and feasible for the site in its local context and to make it accessible for everyone. This is particularly relevant for intensification schemes working to the guidance within the council's Supplementary Planning Document Suburban Design Guide (SDG) 2019. Where a development has been reviewed by Croydon's Place Review Panel, the panel's response should be included in the DAS.

A Character Assessment must be included within a DAS and should include the wider context around the site and consider all scales of character including:

- Urban **(Suburban, Outer-Suburban)¹** grain i.e., the layout of streets and the relationship of built form to the street and other buildings;
- Street elevational rhythms including spacing between buildings,

❖ **Setting assessment (Outer Suburban, [i.e., Outer (London) Suburban], Suburban, Urban or Central)**

❖ **TfL Local Public Transport Accessibility Level (PTAL) at site, current and forecast.**

❖ **Distance from proposed development to the nearest Tram/Train Station or District Centre.**

- The layout of plots and how this informs the street scene, including boundaries and entrances;

❖ **Access Drives full details, length (distance to furthest dwelling from hydrant etc.), width (narrowest and widest) Passing bays, sight lines etc., if Backland development.**

❖ **Assessment of Site Capacity as defined by London Plan Policy D3.**

❖ **The Design code parameters associated with the Site.**

❖ **Finished Floor Levels.**

- Landscape signatures (local prominent types of landscape/ecology/ geology etc) present

¹ <https://www.gov.uk/government/publications/national-model-design-code>

in this part of the borough,

- The predominance and/or design of landscaping along the street and within plots, including hardstanding;
- The key building frontage alignment(s) along the street,
- The form of building footprints, heights of buildings, and the shape of roofs;
- Significant and unique high-quality architectural features and details present in the context including size, style and positioning of windows and other openings.
- Materials used on buildings, boundaries and hardstanding.

❖ **Urban Greening Factor ² (London Plan Guidance)**

A DAS to accompany a listed building consent application must also include an explanation of the design principles and concepts that have been applied to the proposed works specifically in relation to the special architectural or historic importance of the building and its setting. This should be informed by the accompanying heritage statement (see page 19).

The Croydon Planning Application Requirements List

The list set out below comprises the information that Croydon Council requires to validate an application (in alphabetical order). The scope and degree of detail necessary in any assessment, statement etc. will vary according to particular circumstances of each application. Therefore, applicants are advised to discuss proposals with the Council via the pre-application advice service before any application is made as depending on specific site characteristics not all of the assessments outlined below may be necessary. Users of the pre- application advice service will be provided with a tailored list of requirements meeting their specific circumstances.

If an application meets the threshold for a supporting document this needs to be submitted at the time of application, otherwise the application will be invalid. If the documentation submitted with applications is subsequently found to be inadequate, additional information may be requested during the determination process. If this information is not submitted within a strict timescale, the application may be delayed or refused on the grounds of inadequate information.

Please note all policy references will be to the Croydon Local Plan 2018 (hereon referred to as CLP18), **and** the London Plan 2021 (hereon referred to as LP21) **and the NPPF 2021 (including the National Model Design Code & Guidance (NMDC) Parts 1 & 2.)**

- ❖ **This needs to be include in the Croydon Local Plan Review 2022 as it gradually emerges and gains more weight the nearer to adoption in 2022/23.**

² <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/urban-greening-factor-ugf-guidance>

*This symbol denotes information which can be included within a broader document as opposed to a separate statement or assessment but should be identified as such on the Application Inventory.

Validation Reference	Comment	Other Reference
(5) Amenity/ Playspace/Open Space Assessment*	<p>Required for major residential schemes of 10 or more units and any development on open spaces. The assessment can be contained within other documents such as the Planning Statement or Design and Access Statement.</p> <p>An amenity/play space/open space assessment will detail how open space will be provided on-site.</p> <p>For development within open spaces, application proposals should be accompanied by a full assessment of open space in the vicinity of the application site and should include plans showing any areas of existing and proposed open space within or adjoining the application site.</p> <p>It is recommended that amenity/playspace/open space provision is discussed at pre-application stage to determine whether it will be required on-site.</p> <ul style="list-style-type: none"> ❖ Area of Communal Open Space (m²). ❖ Urban Greening Factor 	<p>CLP18 Policies DM10, DM15, DM16, SP5 and SP7 LP21 Policies D6, D8, S4, S5, G3, G4 and G5.</p> <ul style="list-style-type: none"> ❖ London Plan Policy S4 Play and informal recreation³ ❖ Policy of Communal Open Space requires definition in terms of Space/adult. ❖ London Plan Policy SPG Urban Greening Factor
(13) Construction Management or Logistics Plan	<p>Required for all major development and other minor developments that are likely to cause nuisance or disturbance to residential amenity or hazard and obstruction to the public highway during the course of construction.</p> <p>A draft construction logistics plan (CLP), should be submitted detailing exactly how the developer intends to control and reduce dust and emissions from constructions sites; including dust control measures from site haul routes, stockpiles, crushing, grinding operations etc. and vehicle emission control (off and on-road vehicles). This should also include a submission of a schedule of all planned, non-road and road mobile vehicles.</p> <p>These vehicles should comply with the European Emissions Standards for the construction phase.</p>	<p>CLP18 Policies SP5 and DM19 LP21 Policies T4 and T7 Further information on drafting Construction Logistics Plans can be found online here and here.</p>

³ Planning Hierarchy is NPPF, London Plan, Local Plan (CLP18 or CLP22) & Neighbourhood Plan.

	<p>A risk assessment should be conducted for the site. The details of person(s) that are responsible for environmental and dust control should be included. Additionally, due consideration needs to be given to construction materials and best practice environmental standards. Developers should refer to the London-wide Code of Construction Practice to produce a fully integrated construction management and monitoring plan, including:</p> <ul style="list-style-type: none"> • A broad outline of a CLP with reference to TfL's CLP advice • Phasing of the scheme and programme • Hours of operation • Dust control measures on site haul routes • Processes, e.g. Cement batching • Details of vehicles entering and leaving the site, including schedule of lorry movements, site plant etc. • A risk assessment in relation to the existing environments, the scale of the activity, proximity of sensitive receptors, prevailing meteorological conditions and seasonal conditions, length of the construction phase. Preparation of a health and safety report, which in particular focuses on the health and safety of site workers and a contingency plan in case of accidents, as required under the Guide for Site Investigations and Remediation. <p>❖ Provision of photographic evidence of condition of all highways, footpath and verges within the vicinity of the proposed development prior to any works on site to establish proof of any damage reparations required by the developer/applicant subsequent to completion of development.</p> <p>It is suggested that developers discuss requirements for a CLP at the pre-application stage.</p>	
(15) Daylight/ Sunlight Assessment*	<p>Required for all applications where new buildings have the potential to cause adverse impacts upon the current levels of sunlight/daylight enjoyed by adjoining properties or building(s), including associated gardens or amenity space.</p> <p>The Council will need to be satisfied that there would be no unacceptable adverse impact on the current levels of daylight/sunlight enjoyed by adjoining properties or building(s), including associated gardens or amenity space, as well as levels of daylight in the proposed spaces.</p>	<p>CLP18 Policy DM10.6 ❖ SPD2 2.9, 2.11 & 2.16/17, ❖ SPD2 4.11 & 4.16/17.</p> <p>LP21</p> <p>Policies D6 and D9 See Building Research</p> <p>See Building Research Establishment's "Site layout</p>

	<p>The report needs to be prepared in line with the methods described in the Building Research “Site Establishment’s (BRE) layout planning for daylight and sunlight: A guide to good practice” (2011).</p> <p>The report should take into consideration impacts upon existing properties and sites with extant permissions and should include an assessment of sunlight and daylight within the new development.</p> <p>It is recommended that developers enter into pre-application discussions to determine the requirement for a daylight and sunlight assessment and associated scope.</p>	<p>planning for daylight and sunlight: A daylight and sunlight: A guide to good practice” 2011 www.bre.co.uk</p>
(17) Design Code*	<p>All outline applications referred to the Mayor should be accompanied by thorough design codes, ensuring exemplary design standards are carried through the planning process to completion.</p> <ul style="list-style-type: none"> ❖ The ‘Setting’ (Outer Suburban, Suburban, Urban or Central) ❖ The Site Area in sq.m. and hectares ❖ The Design Code Area (in ha or m²) with map of location and marked boundary <ul style="list-style-type: none"> ○ The Floor Area Ratio (Building footprint/Site Area) ❖ For Residential Developments – accommodation and amenity parameters <ul style="list-style-type: none"> ○ Site Area (ha or m²) ○ Number of Units (dwellings) ○ Number of Bedrooms ○ Bedspaces (Occupancy) ○ Gross Internal Area (GIA) of each Unit (m²) ○ Gross Internal Area of proposal (m²) ○ Footprint Area (GEA ground floor footprint) (m²) ○ Height of development from ground level (m) ○ Communal Open Space Area (if multiple units or flats) (m²) ○ Amenity Space area (if Detached or semi-detached Dwellings) (m²) ○ Play space (if HMO or Flats) (m²) ○ In-Build Storage per unit (m²) <i>[should logically be m³ as storage requires volume – NOT two-dimensional floor space!]</i> ○ Any other Parameters to define local Design Code 	<p>LP21 Policy D4</p> <ul style="list-style-type: none"> ❖ NPPF National Model Design Code (NMDC) Parts 1 & 2⁴ ❖ London Plan D3 ❖ London Plan Table 3.1 ❖ National Model Design Code Part 1 & 2 ❖ National Model Design Code Part 1 & 2 ❖ London Plan H2

⁴ <https://www.gov.uk/government/publications/national-model-design-code>

	<ul style="list-style-type: none"> ❖ TfL Local Public Transport Accessibility Level (PTAL) ❖ Distance of proposed development to the nearest Tram/Train Station or District Centre. ❖ Assessment of Site Capacity as defined by London Plan. ❖ Set-back (Building Line) from road and/or footpath to reflect existing building line. 	<ul style="list-style-type: none"> ❖ London Plan 2021 Policy D3 & H2
(20) Environmental Statement	<p>The Town and Country Planning (Environmental Impact Assessment) Regulations (2017) set out the circumstances in which an Environmental Impact Assessment (EIA) is required. Schedule 1 of the Regulations lists development that require an EIA and Schedule 2 lists developments that may require an EIA.</p> <p>Where an EIA is required, an Environmental Statement in the form set out in Schedule 4 to the regulations must be provided.</p> <p>If an EIA is required for an application, many of the documents required as part of Croydon's Validation Requirements List will be included within the Environmental Statement and will therefore not have to be provided separately.</p> <p>Where an EIA is not required, the Local Planning Authority may still require the submission of environmental information. An applicant may request a "screening opinion" to determine whether an EIA is required from the planning authority before submitting the application. The Local Planning Authority has three weeks to determine a screening opinion. If an EIA is not required we will advise you what environmental information will be required to accompany your application.</p> <ul style="list-style-type: none"> ❖ Urban (Suburban) Greening Factor <p>It is suggested that pre-application discussions are undertaken with the Local Planning Authority to determine the requirements for an EIA.</p>	<p>This is requirement under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017</p> <p>Policy SI 1 of the LP21 requires EIA development to consider how to improve air quality.</p> <p>London Plan</p>
(21) Fire Statement	<p>Required for all development proposals creating new enclosed floorspace.</p> <p>Part A All applications for minor developments should be accompanied by a Fire Statement, that meets the requirements of Part A of Policy D12 of the LP21.</p> <p>Part B All applications for major developments should be submitted with a Fire Statement, which is an independent fire strategy (produced by a third party, suitably qualified assessor) and meets the requirements of Part B of Policy D12 of the LP21</p>	<p>LP21 Policies D5, D9, D11 and D12</p>

	❖ Position of nearest Fire Hydrant in relation to proposed Development or furthest dwelling in the case of multiple dwellings.	
(24) Flood Risk Assessment	<p>Required for all developments at risk of flooding.</p> <p>A site-specific flood risk assessment is required for proposals of 1 hectare or greater in Flood Zone 1; all proposals for new development (including minor development and change of use) in Flood Zones 2 and 3, or in an area within Flood Zone 1 which has critical drainage problems (as notified to the local planning authority by the Environment Agency); and where proposed development or a change of use to a more vulnerable class may be subject to other sources of flooding.</p> <p>Due to the high risk of surface water flooding across the Borough, all major developments are required to be accompanied by a Flood Risk Assessment, even if they are not in areas at risk of flooding, to demonstrate that they are not contributing to and are reducing flood risk beyond the site. In these instances, the Flood Risk Assessment should focus on surface water and sustainable drainage techniques to reduce run off.</p> <p>The information provided in flood risk assessment should be credible and fit for purpose. Site-specific flood risk assessments should always be proportionate to the degree of flood risk and make optimum use of information already available, including information in a Strategic Flood Risk Assessment for the area, and the interactive flood risk maps available on the Environment Agency's web site.</p> <p>A flood risk assessment should also be appropriate to the scale, nature and location of the development. For example, where the development is an extension to an existing house (for which planning permission is required) which would not significantly increase the number of people present in an area at risk of flooding, the local planning authority would generally need a less detailed assessment to be able to reach an informed decision on the planning application. For a new development comprising a greater number of houses in a similar location, or one where the flood risk is greater, the local planning authority would need a more detailed assessment.</p> <p>If basement development is proposed, the flood risk assessment should include a basement impact assessment. The assessment should identify the location of the development in relation to an aquifer or a water course; explain how it will impact on flooding and drainage including</p>	P21 Policies SI 12 and SI 13

	<p>measures to reduce the risk of flooding to the proposed basement and neighbouring properties; provide details on ongoing drainage measures and their maintenance regimes.</p> <p>Further information can be provided by the Council at pre-application stage regarding the level of detail required and also detail required in relation to surface water flooding. Additional guidance provided by central Government can also be viewed here</p> <p>Information required in relation to Sustainable Urban Drainage Systems (SUDs) is provided in the relevant section below.</p> <ul style="list-style-type: none"> ❖ Provide Finished Floor Levels (FFL) at ground floor thresholds. ❖ If Wheelchair Access is required and FFL's have to be raised to prevent ground floor surface water floods, methods of wheelchair access needs to be provided either by ramps or other mechanisms. 	
(28) Housing Quality Statement*	<p>Required for all applications for residential development (including conversions and changes of use).</p> <p>The Housing Quality Statement must provide an assessment of how the room size, dwelling area and amenity space provision comply with the minimum standards set out in Policy D6 and Table 3.1 of the LP21 and the National Technical Standards:</p> <ul style="list-style-type: none"> • Provide dual-aspect accommodation • Meet the minimum internal space standards set out in Policy D6 of the LP21 • Meets the accessible housing requirements of Policy D7 of the LP21 • Provide the minimum level of external amenity space • Provide ground floor flats direct access to a garden • Meet design standards for communal space • Meet play space standards in Policy S4 of LP21 • Meet minimum floor space standards for properties being converted or sub-divided into new dwellings <ul style="list-style-type: none"> ❖ Meet design standards for communal open space (Define the Policy in Area/Occupant) ❖ Meet or exceed Minimum Space Standards and In-Build Storage Space Per Unit ❖ Meet within parameters of Local Design Code (Outer-Suburban, Suburban or Urban) ❖ Number of Bed Spaces per Unit ❖ Number of Bedrooms per Unit 	<p>CLP18 Policy SP2 LP21 Policy D6 and Table 3.1</p> <p>❖ London Plan Policy Table 3.1</p>

	<ul style="list-style-type: none"> ❖ Number of floors per Unit ❖ The Site Area (m² & hectares) ❖ Gross Internal Area (GIA) & Gross External Area (GEA) ❖ The Site Area Ratio (Building footprint/Site Area) ❖ The Floor Area Ratio (GIA/Site Area) ❖ Number of on-site Parking Bays ❖ Disabled Parking Bays ❖ Electric charging points (Single, Dual or multiple) ❖ Swept Paths for Ingress & Egress (with all other bays occupied) [Especially situations with limited offside or nearside space for steering lock manoeuvrability] ❖ Sight Lines for entry to highway. ❖ Urban Greening Factor guidance 	<ul style="list-style-type: none"> ❖ National Model Design Code (NMDC) Parts 1 & 2. ❖ London Plan SPG.
(32) Parking Stress Survey	<p>All major developments and any residential developments likely to increase on street parking (this includes intensification schemes proposing 5 or more new build homes).</p> <p>Most forms of development have the potential to result in an increase in on-street car parking, more commonly known as parking stress. A parking stress survey will need to be carried out to ascertain if the resultant increase in on street parking is acceptable and will not impact upon highway safety, the free- flow of traffic, amenity, access by emergency vehicles, refuse collection and delivery of goods. The methodology when undertaking a parking stress survey must be discussed and coped with the Council's Strategic Transport team.</p> <p>In areas of high public transport accessibility levels (PTAL) rating (4 to 6b) and where development occurs in Controlled Parking Zones, (CPZ), it will normally be expected that future occupiers will not be able to acquire permits to park in the zone. This should be agreed as part of (34) Planning Obligations. The required number of Blue badge spaces will need to be provided on site in these locations.</p> <ul style="list-style-type: none"> ❖ At Outer Suburban, Low PTAL areas with no foreseeable improvement of Public Transport Accessibility, the higher parking provision should be considered appropriate to avoid significant overspill onto neighbouring streets. 	<p>CLP18 Policies SP8, DM29 and DM30 LP21 Policies T1, T6 and T6.1 Suburban Design Guide SPD 2019</p> <ul style="list-style-type: none"> ❖ London Plan T1, T6 & T6.1

	<p>❖ Local Parking Stress levels surveys should be during the periods of highest parking need. For Residential Areas this is likely to be overnight parking and for areas around schools, during the beginning and the end of the school attendance periods.</p>	
(35) Planning Statement	<p>Required for all applications with the exception of householder applications and prior approvals.</p> <p>The planning statement should be proportionate and identify the context and need for a proposed development and should include an assessment of how the proposed development accords with policies in the development plan. It may also include details of consultations with the local planning authority and the community undertaken prior to submission. It may also contain summary details of other requirements specified in this document. A copy of any pre-application letters from the LPA should be included for transparency.</p>	<p>CLP18 and SPDs</p> <p>LP21 and SPDs</p> <p>❖ Nation Model Design Code (NMDC) Parts 1 & 2.</p>
(41) Sustainability Assessment	<p>Required for all major developments.</p> <p>The sustainability assessment should outline the elements of the scheme that address sustainable development issues, including the positive environmental, social and economic implications, and must include details of climate change mitigation measures by a suitably qualified energy consultant.</p> <p>❖ Sustainability assessment Factors should include:</p> <p>❖ The Forecast levels of Public Transport Accessibility Levels (PTALS) in relation to the increased Residential Densities (Number of occupants) and the 'Setting' (Outer Suburban, Suburban, Urban or Central).</p> <p>❖ The availability of GP Surgeries for registration and School places resultant on the increase in need due to the increase in local population.</p>	<p>❖ Nation Model Design Code (NMDC) Parts 1 & 2.</p>
(42) Sustainable Urban Drainage System (SuDS) Strategy	<p>Required for all development.</p> <p>Decisions on planning applications relating to major development must ensure that sustainable drainage systems for the management of runoff are put in place, unless demonstrated to be inappropriate. Additionally, the applicant must demonstrate that the proposed minimum standards of operation are appropriate and that there are clear arrangements in place for ongoing maintenance.</p>	<p>CLP18</p> <p>Policies SP6 and DM25</p> <p>LP21</p> <p>Policy SI 13</p>



Development should utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so and should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible in line with the following drainage hierarchy:

1. store rainwater for later use
2. use infiltration techniques, such as porous surfaces in non-clay areas
3. attenuate rainwater in ponds or open water features for gradual release
4. attenuate rainwater by storing in tanks or sealed water features for gradual release
5. discharge rainwater direct to a watercourse
6. discharge rainwater to a surface water sewer/drain
7. discharge rainwater to the combined sewer.

❖ **8 Soil Samples to establish levels of infiltration as London Clay has very low (if any) infiltration capacity and is unsuitable for SUDs Systems.**

❖ **British Geological Survey ⁵**

Developers will be expected to clearly demonstrate how all opportunities to minimise final site runoff, as close to greenfield rate as practical, have been taken. The minimum expectation for development proposals is to achieve at least 50% attenuation of the site's (prior to re-development) surface water runoff at peak times.

Further information can be provided for applicants at pre-application stage.

Yours sincerely



Derek C. Ritson - I. Eng. M.I.E.T.
(MORA Executive Committee - Planning).



Sony Nair
Chairman, Monks Orchard Residents' Association.

⁵ <https://www.bgs.ac.uk/geology-projects/suds/>