



To: Case Officer – Ms Sera Elobisi
Development Environment
Development Management
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From:
Monks Orchard Residents' Association
Planning

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17th February 2019
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Reference: 19/00229/FUL
Application Received: Fri 18 Jan 2019
Application Validated: Fri 18 Jan 2019
Address: 197 Shirley Road Croydon CR0 8SB
Proposal: Erection of two storey detached (one-bedroom) dwelling.
Case Officer: Sera Elobisi
Consultation Close: Thu 21 Feb 2019
Deadline determination: Fri 15 Mar 2019

Dear Ms Sera Elobisi

The Monks Orchard Residents' Association (MORA) represents residents in the Shirley North Ward of the London Borough of Croydon. We are a registered Residents' Association with Croydon Council Local Planning Authority (LPA).

We object to this proposed development for reasons set out in the following submission.

The proposed development has the following parameters:

Relevant Planning Policies

London Plan Adopted Policies:

Policy 3.4 Optimising housing potential

Policy 7.4 Local character

Policy 7.6 Architecture

Croydon Local Plan Adopted Policies:

Policy DM10: Design and character

Policy DM13: Refuse and recycling

Policy DM25: Sustainable Drainage Systems and Reducing Flood Risk

Policy DM45: Shirley (Place Specific Policies).

197 Shirley Road		Ref: 19/00229/FUL	
	sq.m.	ha	
Site Area	67	0.0067	
Housing Density	149.25	u/ha	
Habitable Rooms	2		
Residential Density	298.51	hr/ha	
Bedrooms	1		
Bedspaces	1		
bed spaces/ha	149.25	bs/ha	
GIA	46.40	sq.m	
Storage	?	Not Stated	
Amenity Area	14.05	sq.m.	
Occupants	1		
PTAL (Base year)	2		
PTAL (forecast 2031)	2		
Although D&A statement Para 3.30 referes to plural (occupants)			

Fig 1 - Parameters for this proposed development

London Plan Adopted Policies:

London Plan Policy 3.4 Optimising housing potential Policy

Strategic, LDF preparation and planning decisions

A Taking into account local context and character, the design principles in Chapter 7 and public transport capacity, development should optimise housing output for different types of location within the relevant density range shown in Table 3.2. **Development proposals which compromise this policy should be resisted.**

MORA Comment:

This proposed development is located in an area designated “Focussed Intensification” and as specified at Croydon Plan Policy **DM10.11 c)** the locality is designated as a “suburban” setting.

Relating this “suburban” setting to the London Plan **Policy 3.4 Optimising housing potential**, and the parameters list above, the Residential Density is calculated as **298.51 hr/ha**. This location has PTAL **2** (base Year) and forecast **2** up until 2031. The Policy 3.4 Optimising Housing Potential for a suburban setting is given at Table 3.2. The residential density therefore at **298.51 hr/ha** would require a PTAL of between **4 to 6** or more precisely a **PTAL of 5.313** when in fact the Residential Density for the locality is just **2**.

Assuming the ranges of density and PTAL are approximately linear over the ranges stated then the function of the ranges should follow the formula: $y = mx + c$

Where y = Residential Density, X = PTAL, m = slope and c = y when x = 0.

Thus, Residential Density = **298.51** = $\left(\frac{350-200}{6-4}\right)x - 100 = \frac{298.51+100}{75} = x = **5.313** = **PTAL**,$

when it should rightfully be a **PTAL of 2**.

Table 3.2 Sustainable residential quality (SRQ) density matrix (habitable rooms and dwellings per hectare)			
Setting	Public Transport Accessibility Level (PTAL)	Public Transport Accessibility Level (PTAL)	Public Transport Accessibility Level (PTAL)
	0 to 1	2 to 3	4 (5.313) to 6
Suburban	150–200 hr/ha	150–250 hr/ha	200–350 hr/ha (298.51 hr/ha)
3.8–4.6 hr/unit	35–55 u/ha	35–65 u/ha	45–90 u/ha
3.1–3.7 hr/unit	40–65 u/ha	40–80 u/ha	55–115 u/ha
2.7–3.0 hr/unit	50–75 u/ha	50–95 u/ha	70–130 u/ha
2hr/unit	(149.25 u/ha)		

Fig 2 – London Plan Density Matrix

MORA Comment

We therefore object to this proposed development on grounds that the **Residential Density of 298.51 hr/ha is totally inappropriate for a locality at PTAL 2** and is more appropriate at a locality of **PTAL between 4 to 6** and more accurately at **PTAL of 5.313**.

As Stated in the **current adopted London Plan Policy 3.4 Optimising housing potential**, **Development Proposals which compromise this policy, “should be resisted”**. The applicant has **not provided any justification for deviating from the recommended ranges as required of the policy. This is the current adopted London Plan Policy.**

London Plan Policy 7.4 Local character

Policy

A Development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It should improve an area’s visual or physical connection with natural features. In areas of poor or ill-defined character, development should build on the positive elements that can contribute to establishing an enhanced character for the future function of the area.

Planning decisions

B Buildings, streets and open spaces should provide a high quality design response that:

- has regard to the **pattern and grain of the existing spaces and streets in orientation, scale, proportion and mass**
- contributes to a positive relationship between the urban structure and natural landscape features, including the underlying landform and topography of an area
- is human in scale, **ensuring buildings create a positive relationship with street level activity and people feel comfortable** with their surroundings

- d. allows **existing buildings and structures** that **make a positive contribution to the character of a place** to influence the future character of the area
- e. is informed by the surrounding historic environment.

MORA Comment

The Proposed development does **NOT** respect the **pattern and grain of the existing spaces and streets in orientation, scale, proportion and mass** and therefore is **Non-compliant to the London Plan Policy 7.4 a)**. The proposal takes no account of the **existing buildings and structures to make a positive contribution to the character of the place and is therefore is Non-compliant to the London Plan Policy 7.4 d)**.

In fact, the proposed structure would be **totally out of character with surrounding dwellings** by the **obvious architectural characteristics** and is **forward of the existing building line, fronting Valley Walk** and the fact that the dwelling would have a lower ground floor in a locality with no other properties with basements.

This design proposal is completely out of character with the surrounding dwellings. The proposal does **NOT build on the positive elements** that can contribute to establishing **an enhanced character** for the future function of the area.

We therefore **object** to the **architectural design** of the proposal as **totally inappropriate for this locality at this time** as the **predominant character defines the area of pitched roofs and conventional build structures of brick buildings with conventional tiled roofs.**

This structure does **NOT** blend or **enhance the local character of the Shirley Place.**

We therefore object on the grounds that the proposal is in contravention of the current London Plan Policy 7.4 local Character.

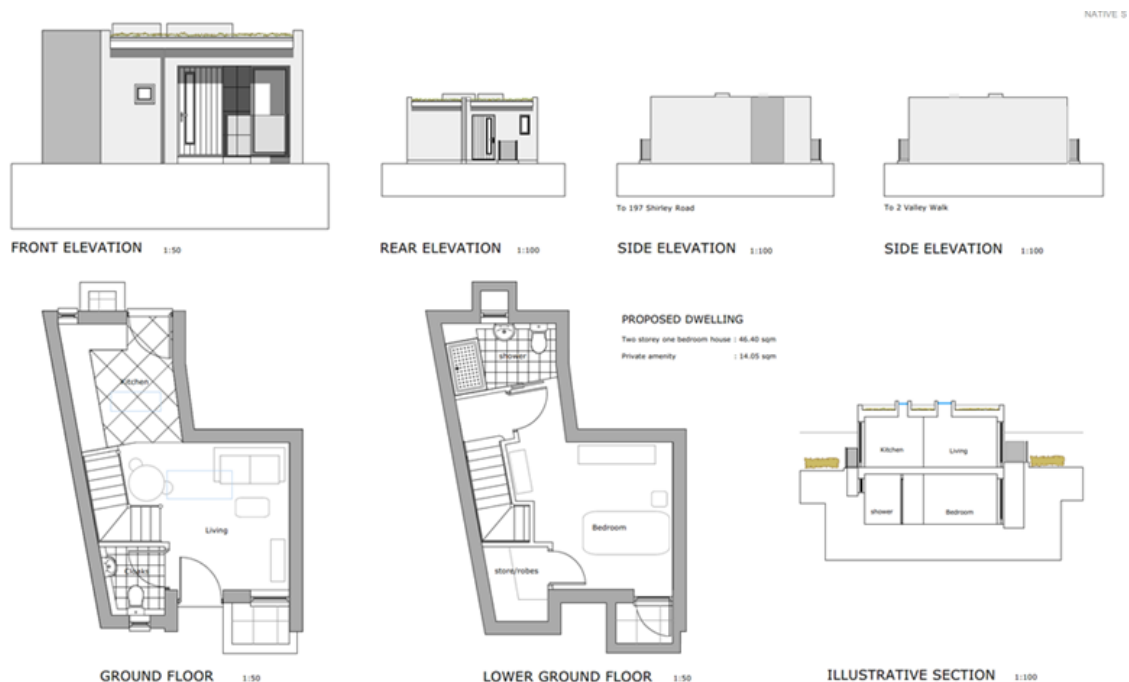


Fig 3 – Proposed Plans and Elevations



Fig 4 - Local Character

London Plan Policy 7.6 Architecture

Policy

A Architecture should make a **positive contribution** to a coherent public realm, **streetscape** and wider cityscape. It should incorporate the highest quality materials and **design appropriate** to its context.

Planning decisions

B Buildings and structures should:

- a). be of the highest architectural quality
- b). be of a **proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm**
- c). comprise details and **materials that complement**, not necessarily replicate, **the local architectural character**
- d). not cause **unacceptable harm** to the amenity of surrounding land and buildings, particularly **residential buildings**, in relation to privacy, overshadowing, wind and microclimate. This is particularly important for tall buildings
- e). incorporate best practice in resource management and climate change mitigation and adaptation
- f). provide high quality indoor and outdoor spaces and integrate well with the surrounding streets and open spaces
- g). be adaptable to different activities and land uses, particularly at ground level



- h). meet the principles of inclusive design
- i). optimise the potential of sites

7.21 Architecture **should contribute** to the creation of a **cohesive built environment that enhances the experience of living**, working or visiting in the city. This is often best achieved by ensuring new buildings reference, but not necessarily replicate, the scale, mass and detail of the predominant built form surrounding them, and by using the highest quality materials. Contemporary architecture is encouraged, **but it should be respectful and sympathetic to the other architectural styles that have preceded it in the locality**. All buildings should help create streets and places that are human in scale so that their proportion and composition enhances, activates and appropriately encloses the public realm, as well as allowing them to be easily understood, enjoyed and kept secured. **The building form and layout should have regard to the density and character of the surrounding development and should not prejudice the development opportunities of surrounding sites.**

7.22 A building should **enhance the amenity and vitality of the surrounding streets**. It should make a **positive contribution to the landscape and relate well to the form, proportion, scale and character of streets**, existing open space, waterways and other townscape and topographical features, including the historic environment. New development, especially large and tall buildings, should not have a **negative impact on the character** or amenity of neighbouring sensitive land uses. Lighting of, and on, buildings should be energy efficient and appropriate for the physical context.

7.23 The massing, scale and layout of new buildings should help make public spaces coherent and **complement the existing streetscape**. They should frame the public realm at a human scale and provide a mix of land uses that activate its edges and enhance permeability in the area. **New buildings should integrate high quality urban design** ensuring an appropriate balance between designing out crime principles and appropriate levels of permeability. Consideration should also be given to the future management of buildings in their design and construction.

MORA Comment:

The proposed architecture does NOT make a **positive contribution** to a coherent public realm, **streetscape**. The proposed development is NOT of similar **scale and proportion, composition, or orientation** that enhances, activates and appropriately defines the **public realm** and is therefore **non-compliant** to the **London Plan Policy 7.6 Architecture A or B sub para b).**

The proposed development does NOT comprise of details and materials that **complement the local architectural character** and is therefore **non-compliant** to the **London Plan Policy 7.6 Architecture B sub para c).**

The proposed development is NOT respectful and sympathetic to the **surrounding architectural styles that have preceded it in the locality** and the **building form and layout** does NOT have regard to the **density and character of the surrounding developments** and therefore is **non-compliant** to the **London Plan Policy 7.6 Architecture at para 7.21.**



The proposed development does **NOT** enhance the **amenity and vitality of the surrounding streets**. It does **NOT** make a **positive contribution to the landscape and relate well to the form, proportion, scale and character of streets** and therefore is **non-compliant** to the **London Plan Policy 7.6 Architecture at para 7.22**.

The proposed development does **NOT** complement the existing streetscape and does **NOT** integrate high quality urban (*Suburban*) design, does not follow the established **Building Line** and therefore is **non-compliant** to the **London Plan Policy 7.6 Architecture at para 7.23**.

We therefore object to this proposed development on grounds of non-compliant with the London Plan Policy 7.6 Architecture at section B sub para b) & c) and paras 7.21, 7.22 & 7.23.

Croydon Local Plan adopted Policies:

Croydon Plan **DM10**: Design and Character

Policy DM10: Design and character

DM10.1 Proposals should be of high quality and, whilst seeking to achieve a **minimum height of 3 storeys**, should respect:

- a. The development pattern, layout and siting;
- 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**.

In the case of development in the grounds of an **existing building which is retained**, development shall be subservient to that building. The council will take into account **cumulative impact**.

6.37 The Croydon Local Plan provides policy on urban design, local character and public realm. However, in line with the **National Planning Policy Framework**, **there is a need to provide detailed guidance on scale, density massing, height, landscape, layout, materials and access**. *This will provide greater clarity for applicants.*

MORA Comment:

Although **DM10.1** and **Para 6.37** recognises **a need for providing detailed guidance on SCALE, DENSITY AND MASSING**, the Croydon Local Plan Does **NOT** provide **any detailed guidance or greater clarity for applicants on either "SCALE, DENSITY or MASSING"** as required by the (new) NPPF Para 16 which states: 16 *Plans should:* sub para d) **contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals**; and at sub para e) **be accessible through the use of digital tools to assist public involvement and policy presentation**; and at para 122 – **Achieving Appropriate Densities, - Planning policies and decisions should support development that makes efficient use of land, taking into account: c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use**; and at sub para d) **the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change**.

Therefore, the Croydon Plan para [DM10.1](#) and [para 6.37](#) relies on the current adopted London Plan Policy 3.2 Density Matrix as the only available guidance for Scale, Density and Massing in order to meet the Croydon Plan Policy [DM10.1](#) and [para 6.37](#) and the guidance stated at [NPPF para 16 d\)](#) and [NPPF para 122](#).

Croydon Plan **DM10**: Design and Character

DM10.4 All proposals for new residential development will need to provide private amenity space that:

- e. 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**.

DM10.7 To create a high-quality built environment, proposals **should demonstrate that:**

- a. The **architectural detailing** will result in a high-quality building and when **working with existing buildings, original architectural features** such as mouldings, architraves, chimneys or porches **that contribute to the architectural character of a building should, where possible, be retained**;
- b. High quality, durable and sustainable materials that respond to the local character in terms of quality, durability, attractiveness, sustainability, texture and colour are incorporated;
- c. Services, utilities and rainwater goods will be discreetly incorporated within the building envelope⁴²; and
- d. To ensure the design of **roof-form positively contributes to the character of the local and wider area**; proposals should ensure the **design is sympathetic with its local context**.

DM10.9 To ensure a creative, sensitive and sustainable approach is taken to incorporating architectural lighting on the exterior of buildings and public spaces the Council will require proposals to:

- a. **Respect enhance and strengthen local character**;
- b. Seek opportunities to enhance and emphasise the key features of heritage assets and local landmark buildings; or seek to encourage the use of public spaces and make them feel safer by incorporating lighting within public spaces; and
- c. Ensure lighting schemes do not cause glare and light pollution.
- d. Adherence with Croydon's Public Realm Design Guide, or equivalent, will be encouraged to aid compliance with the policies contained in the Local Plan.

6.30 A fundamental part of achieving high quality-built environments is **through understanding the local character and the qualities which contribute to local distinctiveness**.

6.34 The National Planning Policy Framework paragraph 58 directs local authorities to develop a set of robust and comprehensive policies which are based upon objectives for the **future of the area** and an understanding and evaluation of its **defining characteristics**.

6.47 Poorly planned piecemeal development of garden land can have significant negative impacts on local biodiversity, amenity, and character. It can also result in noise and visual intrusion into **neighbouring property, interrupt predominant building lines along streets** and weaken the predominant built form and architecture. In landscape terms it can also result in weakened landscape character with loss of trees, including street trees, to make way for new access roads.

DM10.11 In the locations described in **Table 6.3 and shown on the Policies Map** as areas of **focussed intensification**, new development may be significantly larger than existing and should;

- a. Be up to **double the predominant height of buildings in the area**;
- b. Take the form of character types “Medium-rise block with associated grounds”, “Large buildings with spacing”, or “Large buildings with Continuous frontage line;”
- c. Assume a **suburban character** with spaces between buildings.

Developments in **focussed intensification areas** should contribute to an **increase in density** and a gradual change in character. They will be expected to enhance and **sensitively respond to existing character** by being of high quality and **respectful of the existing place** in which they would be placed.

MORA Comment

The proposed development does **NOT** demonstrate that the **architectural detail** reflects the **existing architectural detailing** that contribute to the **character to be retained** or **double the predominant height of buildings in the area** and is therefore **NOT compliant to Policy 10 Design & Character at Policy 10.7 a).**

The proposal **fronts Valley Walk** and is positioned **forward of the predominant building line** of all the properties in Valley Walk which is **inappropriate and in contravention of Policy DM10 para 6.47** (See Fig 5). The Clinic at 197a follows the Valley Walk building Line.

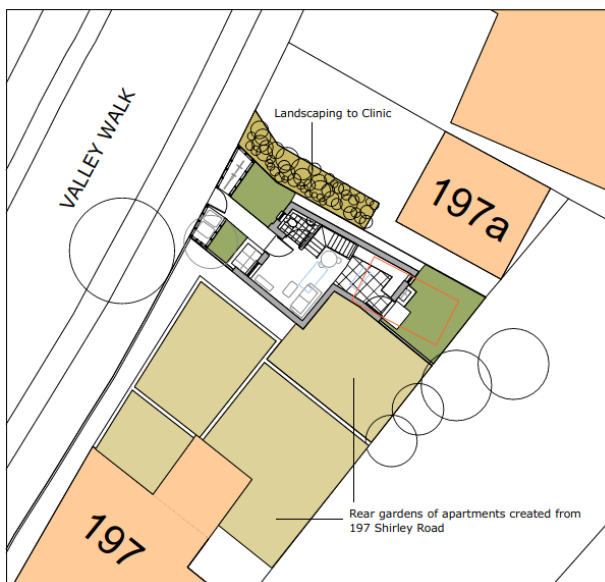


Fig 5- Site Location Plan

The proposed development’s **roof form** is completely different in **structure** and **visual appearance** to the roof forms of the surrounding dwellings of **Valley Walk** including the clinic at **197a Shirley Road** and therefore does **NOT positively contribute to the character of the local and wider area** or is **ympathetic with its local context** and therefore is **non-compliant to Policy DM10.7 d).**

The proposed development does **NOT respect, enhance or strengthen local character** as the proposal is of an **entirely different architectural design** to that of the **predominant local character** as is shown at **Fig 4** above and therefore is **non-compliant to Croydon Plan**

Policy 10 Design & Character Policy 10.1b) & 10.9 a).

This proposed development is located within a “**Focussed Intensification**” **designated area**. However, although subject to an **increase in density**, there are **NO** specified limits to the appropriate **increase in densities defined in the Croydon Local Plan for this designation at Policy DM10.1 b). or DM10.11.** The only current adopted **Policy** which defines any **limitation to Density relative to PTAL** is the **London Plan Policy 3.4** and the associated **Density Matrix**. Thus, an area with designation of “**Focussed**



Intensification,” the density is limited by the maximum density defined by the **setting** locality and the **PTAL range**. In this case at a **PTAL of 2** which is suggested midway between 150hr/ha & 250hr/ha \approx **200hr/ha**. But this proposed Development has an actual **Residential Density of 298.51hr/ha requiring a PTAL of 5.313**, which is completely outside the PTAL range and Residential Density of the locality.

NPPF Policies:

The new NPPF (July 2018) states at para 16 that Local Planning Authorities:

16. Plans should:

- d) contain policies that are **clearly written and unambiguous**, so it is evident how a **decision maker** should react to development proposals;
- e) be accessible through the use of **digital tools** to assist **public involvement** and **policy presentation**;

And at Para 122

Achieving appropriate densities

122. Planning policies and decisions should support development that makes efficient use of land, taking into account:

- c) the **availability and capacity of infrastructure and services** – both **existing and proposed** – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
- d) the desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change; and

MORA Comment:

We therefore object to this proposed development on the grounds that although within a **“Focussed Intensification”** designated area, the **Residential Density** is greater than that defined by the upper limits of the **London Plan Density Matrix** and is therefore **inappropriate for the locality** which has a **PTAL of 2**.

Policy DM13: Refuse and recycling

DM13.1 To ensure that the location and design of refuse and **recycling facilities** are treated as an **integral element of the overall design**, the Council will require developments to:

- a. Sensitively integrate refuse and recycling facilities within the **building envelope**, or, in conversions, where that is not possible, **integrate within the landscape covered facilities that are located behind the building line** where they will not be visually intrusive or compromise the provision of shared amenity space;
- b. Ensure facilities are **visually screened**;
- c. Provide adequate space for the temporary storage of waste (including bulky waste) materials generated by the development; and
- d. Provide layouts that ensure facilities are safe, conveniently located and easily accessible by occupants, operatives and their vehicles.

MORA Comment:

Each residential dwelling is supplied with a **240-litre wheelie bin** for mixed paper and card and a **180-litre wheelie bin** for general rubbish and an **additional bin provided for**

recycling glass, plastic packaging, cans and cartons. An optional **Green Waste bin** for garden waste may also be required.

There is only storage space for **two refuse bins** for this proposed development. Therefore, we contend that the provision is **inadequate** and does NOT meet the requirements of **Policy DM13: Refuse and recycling.**



Fig 6 Refuse Bin location

The positioning of the refuse bins is not located behind the building line and is therefore in contravention of **Policy DM13.1 a).**

The access gate opens **wrong handed** as, when open it actually blocks access to the refuse bins and makes for awkward removal of the bins for refuse operatives. If the Bins are to remain at this location the gate should have the **reverse handed opening** so that when opened, the gate is level with the south boundary wall allowing full access to the bins.

Policy DM25: Sustainable Drainage Systems and Reducing Flood Risk

DM25.1 The Council will ensure that development in the borough reduces flood risk and minimises the impact of flooding by:

- a. Steering development to the areas with a **lower risk of flooding;**
- b. Applying the Sequential Test and Exception Test in accord with Table 8.1;
- c. Taking account of all sources of **flooding from fluvial, surface water, groundwater, sewers, reservoirs and ordinary watercourses;** and
- a. Applying the sequential approach to site layout by locating the most vulnerable uses in parts of the site at the lowest risk of flooding.

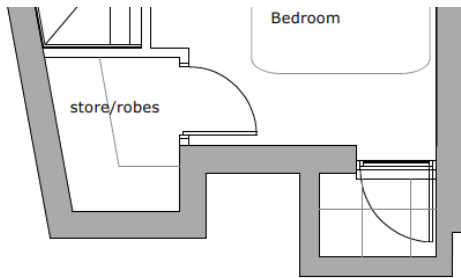
DM25.2 In areas at risk of flooding development should be safe for the lifetime of development and should incorporate flood resilience and resistant measures into the design, layout and form of buildings to reduce the level of flood risk both on site and elsewhere.

DM25.3 Sustainable drainage systems are required in all development and should:

- b. Ensure surface run-off is managed as close to the source as possible;
- c. Accord with the London Plan Sustainable Drainage Hierarchy;
- d. Achieve better than greenfield runoff rates;
- e. Be designed to be multifunctional and incorporate sustainable drainage into landscaping and public realm to provide opportunities to improve amenity and biodiversity;
- f. Achieve improvements in water quality through an sustainable drainage system management train; and
- g. Be designed with consideration of future maintenance.

MORA Comment:

The proposed development is very close to areas at risk of **surface water flooding** which indicates **basements in this locality would be inappropriate.**



The Lightwell could become filled with surface water flooding and seep through the access door as the jambs would unlikely be completely water tight. If this occurred overnight, the water level inside the bedroom could gain significant height which could be very dangerous to a single sleeping occupant.

Fig 7 – Lower Ground Floor

The amount of natural light from the lightwell would be extremely limited as it is only the size of a door and the area open to the elements is extremely limited; it is not possible to scale off the plans provided to measure the depth of the pit or the floor area as there is no graticule scale shown on the plans to scale from.



Fig 8 – Environment Agency Local Surface Water Flood Risk

Policy DM30: Car and cycle parking in new development

To promote sustainable growth in Croydon and reduce the impact of car parking new development must:

- a. Reduce the impact of car parking in any development located in areas of good public transport accessibility⁹⁷ or areas of existing on-street parking stress;
- b. **Ensure that the movement of pedestrians, cycles, public transport and emergency services is not impeded by the provision of car parking;**
- c. **Ensure that highway safety is not compromised by the provision of car parking including off street parking where it requires a new dropped kerb on the strategic road network and other key roads identified on the Policies Map;**

MORA Comment:

There is no parking provision for this proposed development but the future owner could own a car which would require on-street parking outside the proposed development. The recent conversion at 197 Shirley Road has provided accommodation for 11 persons but only two car parking spaces on the front forecourt with any additional vehicles requiring on-street parking. This on-street parking would be in Valley Walk which would increase the on-street parking in Valley Walk.

This development would be next door to the podiatry clinic (see Fig 3). Clients are normally elderly and also not steady on their feet and normally arrive by car as a regular means of travel for visitors to this clinic resulting in additional on-street parking in this vicinity.

Policy: Shirley (Place Specific Policies).

Homes

11.200 An area of sustainable growth of the suburbs with some opportunity for windfall sites will see growth mainly confined to infilling with dispersed integration of new homes **respecting existing residential character and local distinctiveness.**

Character, Heritage and Design

11.202 New development will be **sensitive to the existing residential character** and the wooded hillsides of the Place referring to the Borough Character Appraisal to **inform design quality**. Public realm improvements will focus on the Local Centre. Any building and conversions should be of a high standard of design to **ensure the character** of the Centre is respected.

Transport

11.205 With **improved access and links where possible**, the existing connectivity and **good public transport of Shirley will be maintained**. The community *will* enjoy better quality, **more frequent** and *reliable* bus services connecting with Croydon Metropolitan Centre. Travel plans will look to *ease congestion at peak times* in the Local Centres by encouraging walking, cycling or public transport especially for school journeys. **(When? - Not actually so!)**

MORA Comment

The proposed development does **NOT respect the existing residential character or local distinctiveness**. The proposed development is **NOT sensitive to the existing residential character** and therefore does **NOT meet Policy: Shirley Place Homes para 11.200 & Character, Heritage and Design para 11.202**.

There has been **“no improved access or transport links” in Shirley** and therefore the policy **Shirley Place Transport para 11.205 has NOT been fulfilled**.



Conclusions:

We therefore object to this proposed development on grounds that the Residential Density of **298.51hr/ha** is inappropriate at **PTAL 2** and is more appropriate to a locality at PTAL of **5.313** and as the applicant has not provided any justification for deviating from these recommended ranges as required of the policy, it is therefore non-compliant to the current adopted **London Plan Policy 3.4 Optimising housing potential**. The Policy (as currently defined) states that Development Proposals which compromise this policy, "should be resisted". This is current adopted Policy. The New (Draft) London Plan is not yet adopted policy and is still subject to Examination in Public (EiP), so cannot be used as an argument to disregard the current adopted policy.

We object to this proposal on grounds of not respecting the existing building Line of Valley Walk, not reflecting the scale and proportions of existing surrounding dwellings or the predominant character of pitched tiled roofs and conventional building structures and therefore non-compliant to **London Plan Policy 7.4 Local Character**.

We object to this proposed development on the grounds that it is **NOT** of similar **scale and proportion, composition, or orientation** that enhances, activates and appropriately defines the **public realm**. It does **NOT** complement the local **architectural character**, is **NOT** respectful and sympathetic to the **surrounding architectural styles that have preceded it in the locality** as does the **building form and layout** which does **NOT** have regard to the **density and character of the surrounding developments** and does **NOT** enhance the **amenity and vitality of the surrounding streets**. The proposed development does **NOT** make a **positive contribution to the landscape and relate well to the form, proportion, scale and character of streets** in which it would sit and does **NOT** complement the existing streetscape nor does it integrate as a **high-quality urban design** and therefore is in contravention of the **London Plan Policy 7.6 Architecture Part B sub para c) and paragraphs 7.21, 7.22 & 7.23**.

We object to this proposed development on the grounds that it does **NOT** demonstrate that the **architectural detail reflects the existing architectural detailing** that contribute to the **character to be retained** and therefore is **NOT** compliant to the **Croydon Plan Policy DM10.1 and Para 6.37 Design & Character at Policy DM10.7 a)**. The proposed development **roof form** is completely different in **structure** and **visual appearance** to the roof forms of the surrounding dwellings and buildings and therefore does **NOT** **positively contribute to the character of the local and wider area** or is **NOT** sympathetic with its **local context** and therefore is **non-compliant** to Croydon Plan **Policy DM10.7 d)**. The proposed development does **NOT** **respect, enhance or strengthen local character** as the proposal is of an **entirely different architectural design** to that of the **predominant local character** as is shown at **Fig 1 and Fig 2** above and therefore is **non-compliant** to **Croydon Plan Policy DM10 Design & Character Policy DM10.9 a), para 6.30, 6.34 and DM10.11**.

We also **Object** on grounds that the **Refuse & Recycling** provision is inadequate and does **NOT** meet the requirements of the **Croydon Plan Policy DM13: Refuse and recycling**.



In addition, the local area is subject to surface water flooding as identified by the Environment Agency surface water flood map for this address and therefore basements in this locality should be avoided and therefore is non-complaint to Policy **DM25 Sustainable drainage and reducing Flood Risk**.

The proposed development does not comply with the Policies of the Shirley "Place" *Homes para 11.200* as it does NOT respect existing residential character and local distinctiveness of the Shirley "Place" *Character, Heritage and Design para 11.201* as it is NOT sensitive to the existing residential character.

Please register this objection on the on-line public register as Monks Orchard Residents' Association (MORA) (Objects) such that our members are aware we have made representations of their behalf.

Please inform us at planning@mo-ra.co of your decision in due course.

Yours sincerely

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

Sony Nair – Chairman, Monks Orchard Residents' Association.
On behalf of the Executive Committee, MORA members and local residents.

Cc:

Sarah Jones MP

Mr. Pete Smith

Steve O'Connell

Cllr. Sue Bennet

Cllr. Richard Chatterjee

Cllr. Gareth Streeter

Croydon Central

Head of Development Management (LPA)

GLA Member (Croydon & Sutton)

Shirley North Ward Councillor

Shirley North Ward Councillor

Shirley North Ward Councillor

Bcc:

MORA

Local Residents

Interested Parties

Executive Committee