

To: Case Officer – Ms Victoria Bates
Development Environment
Development Management
6th Floor
Bernard Weatherill House
8 Mint Walk
Croydon
CR0 1EA

From:
Monks Orchard Residents' Association
Planning

Email: dm@croydon.gov.uk
Development.management@croydon.gov.uk
victoria.bates@croydon.gov.uk

11th February 2019
Emails: planning@mo-ra.co
chairman@mo-ra.co
hello@mo-ra.co

Reference: 19/00219/FUL
Application Received: Thu 17 Jan 2019
Application Validated: Wed 30 Jan 2019
Address: 2 Round Grove Croydon CR0 7PP
Proposal: Demolition and erection of a two-bedroom two storey dwelling with associated amenity space, car parking, storage and cycle storage
refuse
Case Officer: Victoria Bates
Consultation Close: Sat 23 Feb 2019
Deadline determination: Wed 27 Mar 2019

Dear Ms Victoria Bates

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).

The proposed development has the following parameters:

Site Area		187.7	sq.m.	0.01877	ha
Number of Dwellings		1			
Habitable Rooms		4			
Bed Spaces		4			
Occupants		4			
Storage Space	LP T3.3	0.9	0.9	0.81	sq.m
Cpd (storage Space)	LP T3.3	0.5	0.8	0.40	sq.m
				1.21	sq.m
GIA	LP T3.3	75.7	sq.m.		
Housing Density	LP T3.2	53.28	u/ha		
Residential Density	LP T3.2	213.11	hr/ha		
Residential Density	bs/ha	213.11	person/ha		
PTAL (Base Year)	2011	1a			
PTAL	2031	1a			
Car Parking		1			

Relevant Planning Policies

London Plan Adopted Policies:

Policy 3.4 Optimising housing potential

Policy 3.5 Quality and design of housing developments

Policy 6.11 Smoothing traffic flow and tackling congestion

Policy 7.4 Local character

Policy 7.5 Public realm

Policy 7.6 Architecture

Croydon Local Plan adopted Policies:

Policy DM10: Design and character

Policy DM13: Refuse and recycling

Policy DM29: Promoting sustainable travel and reducing congestion

Policy DM30: Car and cycle parking in new development

Policy DM45: Shirley (Place Specific Policies).

On behalf of our members we object to the above-mentioned planning application development proposal on the following grounds but we recognise that the plot is considered a brownfield site and therefore subject to re-development but that this proposed development is inappropriate for the locality. (The type face with green background are current Planning Policies).

Current 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.**

The **Residential Density** of the proposed development is $4/0.01877 = 213.11$ hr/ha.

The PTAL for the locality is 1a (i.e. Numerically ≈ 0.66)

The Residential Density range recommended for Suburban Setting at **PTAL 1a** is between **150 to 200 hr/ha**. However, the proposed development has Residential Density of **213.11hr/ha** which is in the **PTAL range 150 to 250**.

Assuming the incremental **PTAL** and **Residential Densities** over the ranges recommended are approximately linear, then the actual PTAL at Residential Density of **213.11hr/ha** should follow the straight-line graph of:

$y = mx + c$ where m = slope, y = Residential Density, x = PTAL and $c = 0$ when $y = 0$.

Therefore, the actual PTAL appropriate for this proposal is:

$$213.11 = \left(\frac{250-150}{3-2} \right) x - 50; \text{ which gives: } \frac{213.11+50}{100} = x = \mathbf{2.6311} = \text{PTAL}$$

This can be shown on the London Plan Density Matrix Table 3.2 to illustrate that the **Residential Density** of the proposed development is inappropriate for a PTAL of 1a (≈0.66) when it **actually requires a PTAL of ≈2.63** (assuming a linear incremental increase over the Density and PTAL ranges).

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 (1a)	2 (2.63) to 3	4 to 6
Suburban	150–200 hr/ha	150–250 hr/ha (213.11 hr/ha)	200–350 hr/ha
3.8–4.6 hr/unit (4hr/u)	35–55 u/ha (53.28 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

MORA Comment:

The **PTAL** for this locality is at **1a** (numerically equivalent to 0.66) and the nearest Public Transport Bus Stop is either ≈568m or ≈518m walking distance (depending on required direction of public transport travel) which is a significant inconvenient distance during inclement weather conditions.

We therefore object to this proposed development on grounds that the Residential Density of 213.11hr/ha is inappropriate at PTAL 1a and is more appropriate at PTAL of **2.63** (i.e. approaching 3). As Stated in 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 these recommended ranges as required of the policy. This is current adopted Policy.

London Plan Policy 3.5 Quality and design of housing developments

Strategic

A Housing developments should be of the highest quality internally, externally and in relation to their context and to the wider environment, taking account of strategic policies in this Plan to protect and enhance London’s residential environment and attractiveness as a place to live. Boroughs may in their LDFs introduce a presumption against development on back gardens or other private residential gardens where this can be locally justified.

3.35 The quality of individual homes and their neighbourhoods is the product of detailed and local design requirements but the implementation of these across London has led to too many housing schemes in London being of variable quality. The cumulative effect of poor-quality homes, and the citywide benefits improved standards bring, means this is a strategic issue and properly a concern of the London Plan. Addressing these issues is an important element of achieving the Mayor's vision and detailed objectives for London and its neighbourhoods set out in [Chapter One](#).

Table 3.3 Minimum space standards for new dwellings					
Number of bedrooms	Number of bed spaces	Minimum GIA (m ²)			Built-in storage (m ²)
		1 storey dwellings	2 storey dwellings	3 storey dwellings	
1b	1p	39 (37)*			1
	2p	50	58		1.5
2b	3p	61	70		2
	4p	70	79		

The proposed development Design and Access Statement purports to have a proposed total floor area (GIA) of **75.7sq.m. or 814.8 sq.ft.**

The London Plan minimum space standards for **New Dwellings** at **Table 3.3** require a **2-Bed 4-person 2-Storey dwelling** to have **79 m² Gross Internal Area (GIA)** and therefore the proposed development **fails to meet this requirement** by **3.3m²**. The applicant fails to **justify** why the proposed development does **NOT** meet the **minimum spaces standards** required by the **London Plan Policy 3.5**.

In addition, the required storage space for a **2-Bed 4-person 2 storey dwelling** is **2m²** whereas the proposed dwelling has only (**≈0.9m x ≈0.9m**) **≈ 0.81m² plus (≈0.8m+≈0.4m) ≈0.4m² which totals ≈1.21m² Storage Area** (as scaled off and measured from the supplied plans). The **Utility Cupboard** is assumed **not** included as available storage area as it is assumed that this area is required for the Boiler and/or Hot Water Tank.

MORA Comment:

We object to this proposed development on the grounds that the proposed dwelling does NOT meet the required minimum space standards for a 2-bed, 4-person, 2-storey dwelling in respect of minimum floor space (GIA) requirement or minimum Storage space standards requirement and therefore does not fully comply with the London Plan Policy 3.5 Quality and design of housing developments Table 3.3 Minimum Space Standards for New Dwellings.

London Plan Policy 6.11 Smoothing traffic flow and tackling congestion

A The Mayor wishes to see DPDs and Local Implementation Plans (LIPs) take a coordinated approach to **smoothing traffic flow** and **tackling congestion** through implementation of the recommendations of the Roads Task Force report.

MORA Comment:

Recent piecemeal development in the **Shirley North Ward** has increased local residential population by **284** (including the 4 additional persons resulting from this application if approved). This requires an increase in **PTAL** to meet the increased **Residential Densities** in the locality. The Ward is served by a single decker **367 Bus** Route from West Croydon to/from Bromley via Shirley Oaks Village. This Bus Route is becoming **heavily congested** at peak times and the increase in **Residential Densities** from **cumulative piecemeal developments** is causing local passenger frustration.

The additional cumulative local development requires reassessment of local bus service provision as residents are converting to other modes of transport to avoid this passenger congestion which is a preference for **car usage which should be avoided**.

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:

- a. has regard to the pattern and grain of the existing spaces and streets in orientation, scale, proportion and mass
- b. contributes to a positive relationship between the urban structure and natural landscape features, including the underlying landform and topography of an area
- c. 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 locality or have regard to the **form, function, and structure** or physical connection with the **local features** of the locality, place or **street scene**, and does not reflect the **scale, mass and orientation of surrounding buildings**. In fact, the proposed structure would be **totally out of character with surrounding dwellings** by the obvious architectural characteristics proposed.

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.

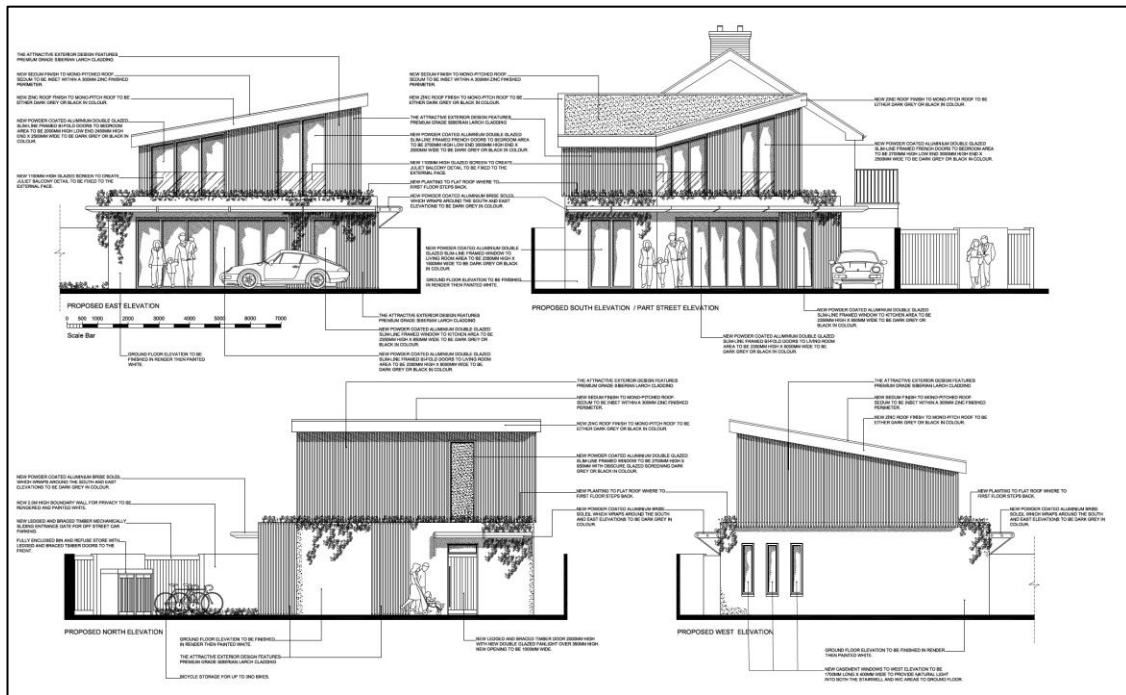


Fig 1 – Proposed Elevations



Fig 2 – Existing Local Character

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

The proposal does not have regard to the **pattern and grain of the existing spaces and streets in orientation, scale, proportion and mass** and therefore is non-compliant to **London Plan Policy 7.4 a)**. The proposal does **NOT** allow existing buildings and structures that make a **positive contribution to the character of a place to influence the future character of the area** nor is it informed by the surrounding historic environment.

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 and 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**.

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 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 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 design** 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:

Policy DM10: Design and character

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**.

6.37 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 **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: **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. The **ONLY** relevant adopted policy which defines Croydon Plan Para 6.37 is the current adopted London Plan Policy 3.2 Density Matrix which is the **ONLY currently adopted policy guidance for these parameters**.

The proposed development does **NOT** demonstrate that the **architectural detail** reflecting the **existing architectural detailing** that contributes to the **character to be retained** and therefore is **NOT compliant** to **Policy 10 Design & Character at Policy 10.7 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.** It is **NOT sympathetic 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 1 and Fig 2** above and therefore is **non-compliant** to **Croydon Plan Policy 10 Design & Character Policy 10.9 a).**

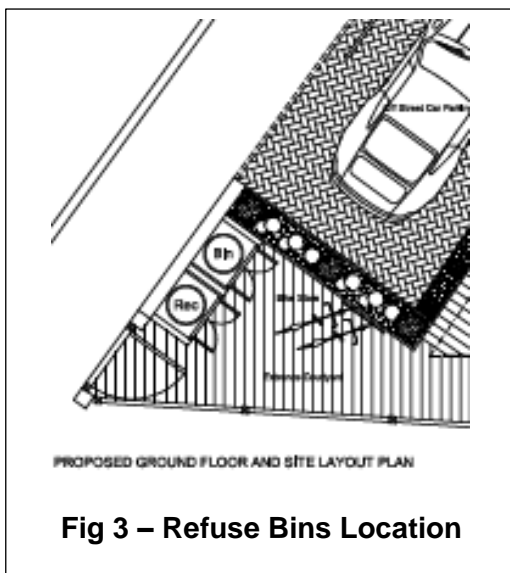
Policy DM13: Refuse and recycling

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:

- 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;
- Ensure facilities are **visually screened**;
- Provide adequate space for the temporary storage of waste (including bulky waste) materials generated by the development; and
- 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 **woefully inadequate** and does NOT meet the requirements of **Policy DM13: Refuse and recycling.**



The positioning of the refuse bins are 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 DM29: Promoting sustainable travel and reducing congestion

To promote sustainable growth in Croydon and reduce the impact of traffic congestion development should:

- a. Promote measures to increase the use of public transport, cycling and walking;
- b. Have a positive impact and must not have a detrimental impact on highway safety for pedestrians, cyclists, public transport users and private vehicles; and
- c. Not result in a severe impact on the transport networks local to the site which would detract from the economic and environmental regeneration of the borough by making Croydon a less accessible and less attractive location in which to develop.

10.33 The extent of the local public transport network includes bus routes within a 10-minute walk, tram routes and train stations within a 15-minute walk and cycle and walking routes within 15-minutes of the development. The exact extent of the local transport networks should be considered in the Transport Assessment.

MORA Comment:

As previously stated, recent piecemeal development in the **Shirley North Ward** has increased local residential population by **284** (including the **4** additional persons resulting from this application if approved). To meet these increases in **Residential Densities** requires a proportionate increase in PTAL in the locality. The Ward is served by a single decker **367 Bus** Route from West Croydon to/from Bromley via Shirley Oaks Village. This Bus Route is becoming **heavily congested** at peak times and the increase in **Residential Densities** resultant from **cumulative piecemeal developments** is causing local passenger frustration. An additional Bus Service **689** has been introduced to serve local schools, specifically for the school run and specifically for school children as the **367** could not cope during the school run congestion period.

The **PTAL** is at **1a** (numerically equivalent to 0.66) for this location and **the nearest Public Transport 367 Bus Stop** is either **≈568m** or **≈518m** walking distance (depending on required direction of public transport travel) which is a significant inconvenient distance during inclement weather conditions. Assuming walking speed is **≈1.5m/sec** then the time to walk **568m ≈14.20 minutes** and to walk **518m ≈12.95 minutes**. These are **all above the recommended 10-minute walk to a Bus stop** as specified in **Policy DM 29 para 10.33**.

The 367 Buses vary between 20min and 30min intervals depending on time of day and capacity.

The additional cumulative local development requires reassessment of local bus service provision as residents are converting to other modes of transport to avoid this passenger congestion which is a preference for **car usage which should be avoided**.

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:

The parking bay shown is 5.5m x 3.2m and if the sliding gate is taken into account the bay width would be reduced to 3.0m. The maximum width of the entrance into the bay is shown as 3.5m. However, the sliding entrance gate is shown as stopping at the left-hand flower bed so the gate will be projecting 1.5m into the entrance space thus reducing the width of the entrance to 2.0m. If this remains the case it would be impossible to park a car in the parking bay, other than a 'Smart Car' or similar and the only feasible method would be by a parallel parking manoeuvre, reversing into the bay (not in a forward direction as illustrated on the proposal plans).

However, even if the gate completely slides back so that the full 3.5m entrance is clear then, although possible to park a Smart Car or equivalent into the bay, family cars, estate cars and mid-size SUV's will **not** be able to park without undertaking two, three or even more parking manoeuvres, reversing and forwarding (See Figure 4).

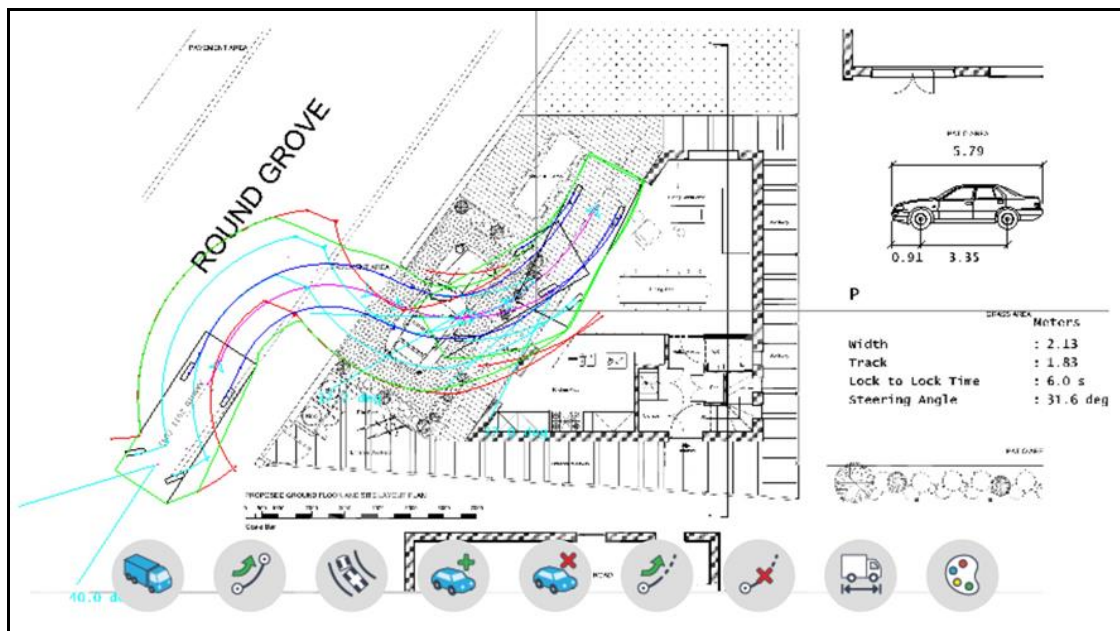


Fig 4 – Parallel Parking reversing – attempting to reverse into the Parking Bay

The standard parallel parking bay on a highway is generally 6.0m x 2.4m and most cars should be able to park in this space. However, the highway bay is open for the full 6.0m length and generally cars in the adjacent bays are not parked tight to the ends of the adjacent bays. Therefore, this makes reverse parallel parking easier. Also, the road width – even with double parking - allows full lock arc to gain access in a reverse direction.

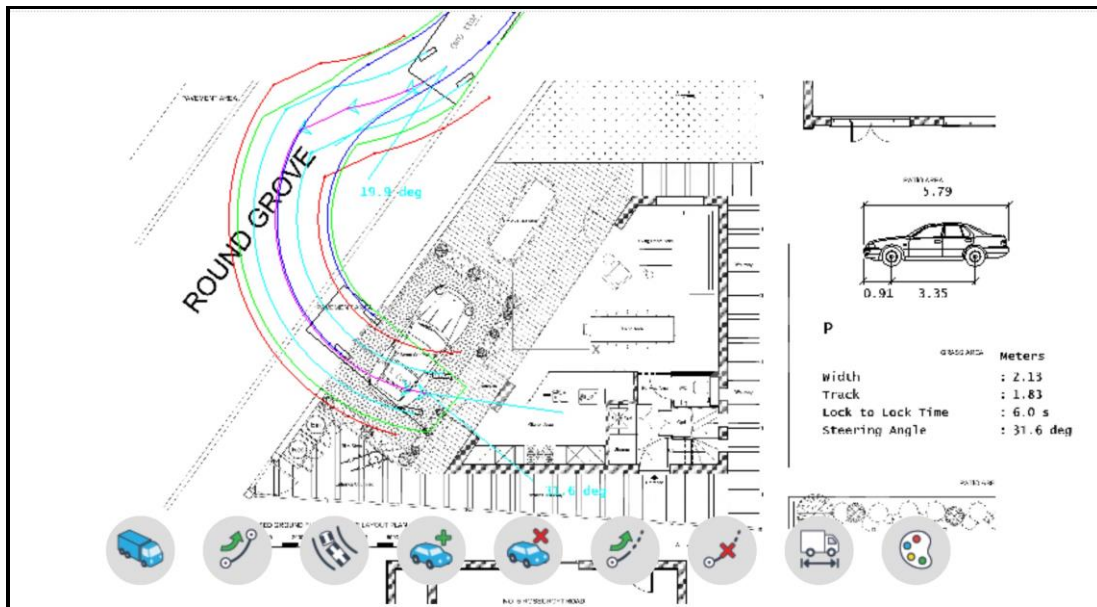


Fig 5 - Entering from a Northerly Direction (not Possible in one manoeuvre)

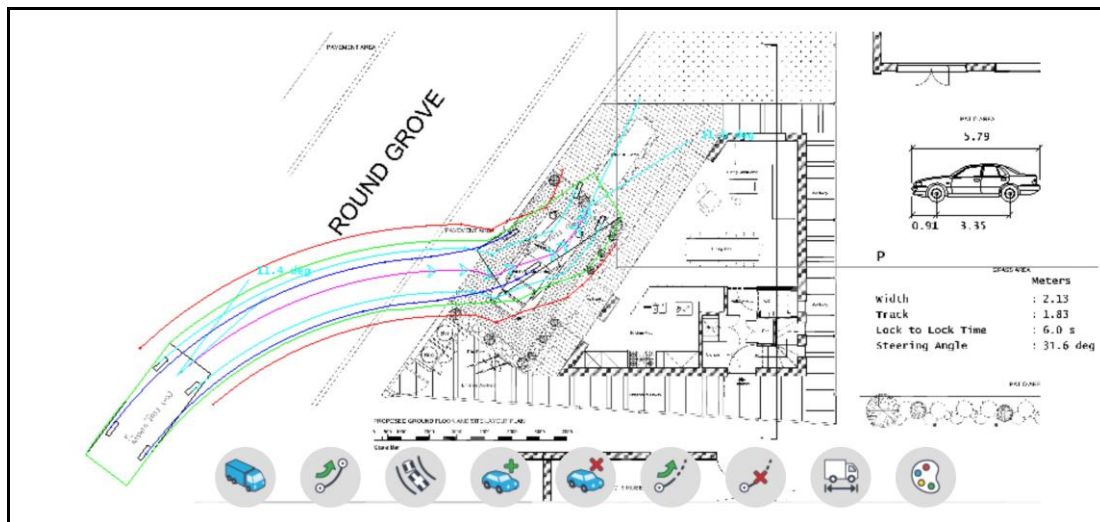


Fig 6 – Entering from a Southerly Direction (again Not Possible in one manoeuvre)

There is no turning facility and the swept path for entering and exiting this hard stand area is not provided on the plans and is considered to be an exceedingly difficult – or probably an impossible manoeuvre. If entering in a forward gear, in order to position the front of the vehicle within the car hard stand area, the front offside would likely encroach over the offside border area and the protruding edge of the sliding gate would foul the nearside passenger doors. (See Fig 5 & 6).

If able to gain access, to exit would require full anti-clockwise lock to get the rear of the vehicle to exit the gate opening but would require a significant wider arc range for the front than is

available in order to get the rear of the vehicle positioned to exit through the limited gap. It is extremely doubtful that this manoeuvre would be physically possible within the area allocated.

Exiting, if possible, would be **extremely dangerous** as the high 2m fence would block any driver seated parallax view of the footway above the fence to establish if pedestrians are about to cross the path of the exiting vehicle. Individual pedestrians would need to be taller than the fence to be seen by the driver and the vehicle would need to be virtually over the footpath before the driver could see both ways along the footpath. This is an exceedingly dangerous situation.

Due to the lack of sight lines resulting from the 2.0m boundary fence either side of the entrance into the parking bay a car leaving the bay would be projecting 2.0m over the pavement before the driver could see any pedestrians walking along Round Grove. Croydon's drawing HS/1096, Pedestrian Visibility Splays & Parking Areas, requires a 1.5m x 1.5m triangular area, each side of any parking space, in which the maximum height of any obstruction is 0.6m. This is definitely a health and safety risk.

We therefore contend that this parking provision is totally inadequate and unlikely to be used for the purpose intended as the access and egress would be too difficult and awkward a manoeuvre and that egress would be extremely hazardous to pedestrians.

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. **(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 **213.11hr/ha** is inappropriate at **PTAL 1a** and is more appropriate to a locality at PTAL of **2.63** (i.e. approaching 3) and as the applicant has not provided any justification for deviating from these recommended ranges as required of the policy it is 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 proposed development on the grounds that the proposed dwelling does NOT meet the required minimum space standards for a 2-bed, 4-person, 2-storey dwelling in respect of minimum floor space (GIA) requirement or minimum Storage space standards requirement and therefore does not fully comply with the London Plan Policy 3.5 Quality and design of housing developments Table 3.3 Minimum Space Standards for New Dwellings.

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 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 10 Design & Character at Policy 10.7 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 10 Design & Character Policy 10.9 a)**.



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

We also object to this proposed development on the ground that the parking provision is totally inadequate and unlikely to be used for the purpose intended as the ingress and egress would be too difficult and awkward a manoeuvre (probably impossible to achieve) and that egress would be extremely hazardous to pedestrians and is therefore non-compliant to Croydon Plan **Policy DM30: Car and cycle parking in new development**.

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 and Shirley "Place" **Character, Heritage and Design para 11.201** as it is NOT sensitive to the existing residential character.

Please list our representation on the on-line public register as Monks Orchard Residents' Association (Objects) such that our members are aware of MORA's support.

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