



To: Mr Wayne Spencer- Case Officer  
Development Environment  
Development Management  
6th Floor  
Bernard Weatherill House  
8 Mint Walk  
Croydon  
CR0 1EA

From:  
Monks Orchard Residents' Association  
Planning

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4<sup>th</sup> January 2019  
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**Reference: 18/05928/FUL**  
**Application Received: Fri 07 Dec 2018**  
**Application Validated: Fri 07 Dec 2018**  
**Address: 20-22 The Glade Croydon CR0 7QD**  
**Proposal: Erection of 2 x three bed semi-detached dwellings with associated access and parking. Formation of parking areas for 20 & 22 The Glade.**  
**Status: Awaiting decision**  
**Case Officer: Wayne Spencer**  
**Consultation Close: Sun 06 Jan 2019**

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Dear Mr Spencer

We would like to object to the above-mentioned planning application for the reasons set out below:

### Relevant Planning Policies:

#### Croydon Local Plan

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

**DM10.4 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 **200m<sup>2</sup>** (whichever is the smaller) of the existing garden area is **retained for the host property**, after the subdivision of the garden.

#### London Plan (current adopted)

#### Policy 3.4 Optimising housing potential

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.**



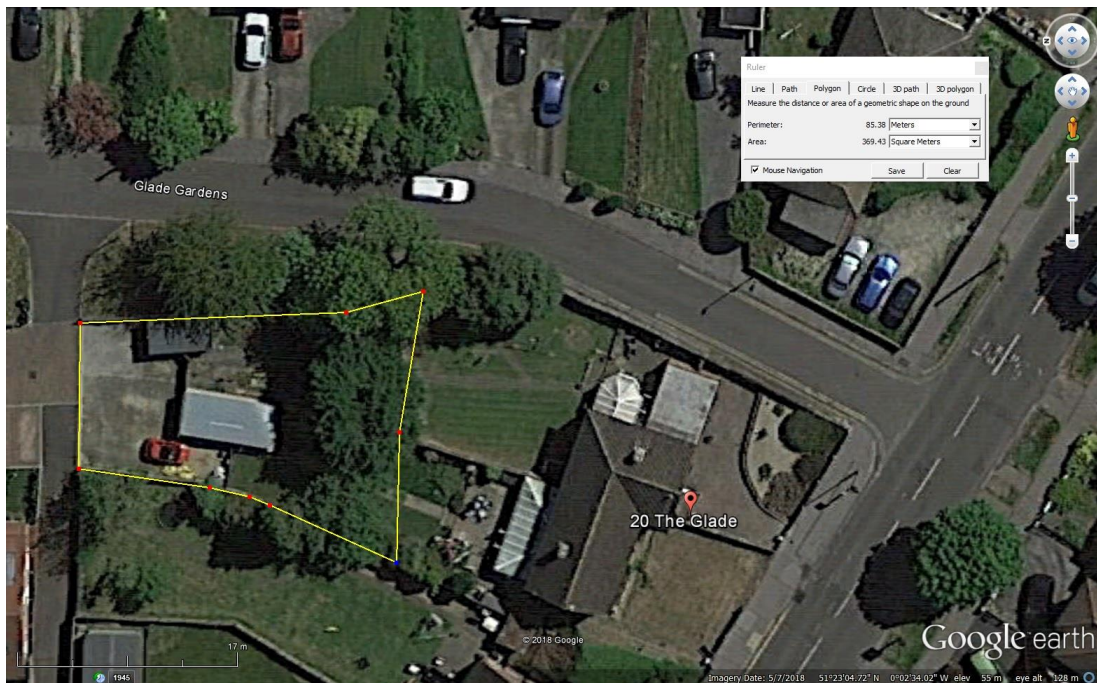
## Proposal Parameters:

20-22 The Glade - Ref:18/05928/FUL					
Site Area (Host)	1180	sq.m.	0.118	ha	
Retained	810	sq.m.	0.081	ha	
New Site Area (approx. Google Earth)	370	sq.m.	0.037	ha	
Housing Density (Total Site)	33.90		units/ha		
Housing Density (New Site)	54.05		units/ha		
New Site:	Grnd	1st Floor	Roof space	GIA	
Plot 1	53.76	40.8	26.52	121.08	
Plot 2	53.76	40.8	26.52	121.08	
Total				242.16	sq.m.
Residential Density (New Site):					
Hr/ha	270.27	hr/ha			
Bed Spaces per ha	324.32	Bs/ha			
New Site	Habitable Rooms	Bed Rooms	Bed Spaces	Occupants	
Ground Floor Units 1&2	4				
First Floor Units 1&2	4	4	8	8	
Roof Space Units 1 & 2	2	2	4	4	
Total:	10	6	12	12	
PTAL (Base 2011)	1a				
PTAL (Forecast 2031)	1a				
Car Parking (New):					
Unit 1	1				
Unit 2	1				
Total	2				

From the above parameters it can be seen that the **Residential Density** of the proposed development of **2 dwellings** on the partitioned **site area** of approximately **0.037ha** (Google Earth Estimate) is  $\approx$  **270.27 habitable Rooms per hectare** which relates to a **PTAL** of between **4 to 6** as depicted in the **London Plan SQR Density Matrix**. If the ranges of **PTAL** and **Density** given in the Density Matrix are considered approximately **linear over the ranges** and follow the function  $y = mx + c$  where  $y = \text{Residential Density}$ ,  $x = \text{PTAL}$ ,  $m = \text{slope} = \Delta y / \Delta x$  and  $c = y$  when  $x = 0$ .

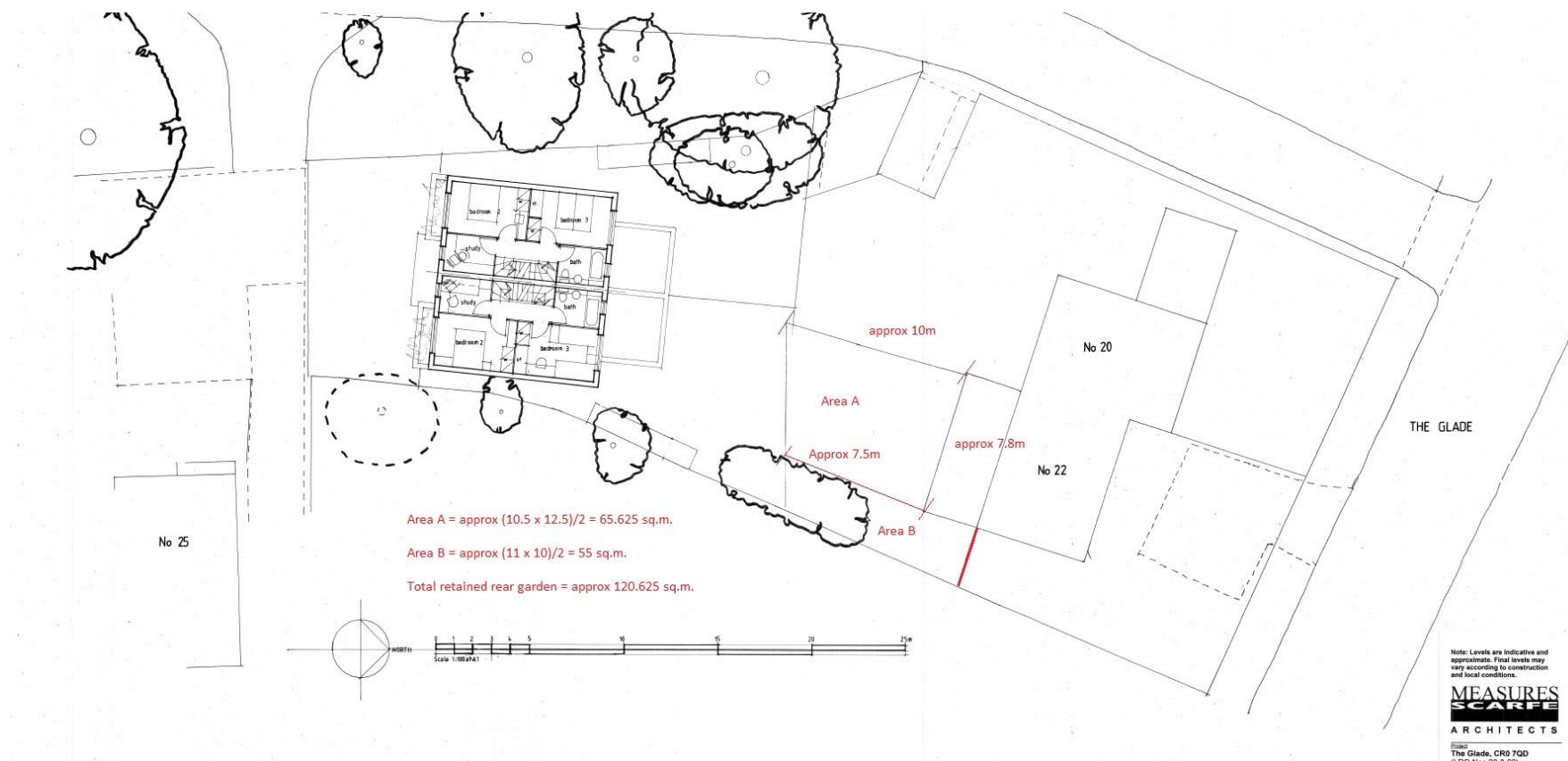
then:  $270.27 = \left(\frac{350-200}{6-4}\right)x - 100$  where  $x = \text{PTAL} = 4.94$  i.e. approaching 5 when it should rightfully be 1 or precisely 1a.

Therefore, the **Residential Density** of the proposed development for the **partitioned site area** of approximately  $\approx 0.037\text{ha}$  in a **suburban setting**, equates to a required **PTAL** of approximately  $\approx 4.94$  when the locality has an actual **PTAL** of 1a and is forecast to remain at 1a until 2031.



**London Plan 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 to 6
Suburban	150–200 hr/ha	150–250 hr/ha	200–350 hr/ha <b>(270.27 hr/ha)</b>
3.8–4.6 hr/unit <b>(5 hr/unit)</b>	35–55 u/ha <b>(54.05 u/ha)</b>	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



**Policy DM10.4 e)** states: “a minimum length of 10m and no less than half or 200m<sup>2</sup> (whichever is the smaller) of the existing garden area is retained for the host property, after the subdivision of the garden.”

It can be seen that the retained rear garden area for **no.22 The Glade** does **NOT** meet this requirement. Using the scale as shown on the proposed plans it is estimated that the **Area A** is approximately **65.625m<sup>2</sup>** and **Area B** is approximately **55m<sup>2</sup>** which gives a **total retained rear garden area** of approximately **120.625m<sup>2</sup>**. This therefore does **NOT** meet the **DM10.4 e)** required minimum retained garden area of **200m<sup>2</sup>** and is also **NON-compliant** to policy **DM10.4 e)** on garden developments for a retained **minimal** length of **10m** throughout the width of the retained rear garden.

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



We therefore **Object** to this development proposal on the grounds of being **Non-Compliant** to the current adopted **London Plan Policy 3.4 Optimising housing potential**, with respect to excessive **Residential Density** at **PTAL 1a** as the **Residential Density** for a suburban setting does NOT reflect the guidance given in the **London Plan Policy 3.4** and there is **NO justifications** for not meeting the policy, as supported by **NPPF** (24July 2018) which states:

**“Achieving appropriate densities: para122. 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 ...”**

Also, being **Non-Compliant** to the **Croydon Local Plan Policy DM10.4e** relating to garden development by **NOT** meeting the required minimum retained area of **200m<sup>2</sup>** and the policy requirement of a **minimal length of 10m** throughout the width of the retained rear garden area of the host property at **22 The Glade** after subdivision as supported by **NPPF** (24 July 2018) which states:

**70. Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.**

We therefore recommend a **refusal** for this application. Please acknowledge receipt of this formal objection and that it has been received within the appropriate consultation period for this application, to email address at: [planning@mo-ra.co](mailto:planning@mo-ra.co)

Please register our comment as: **Monks Orchard Residents’ Association (Objects)** on the comments tab of the LPA online public register such that our members are aware that we have objected on their behalf. Please inform us of your recommendation and decision in due course.

Yours sincerely

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

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





**Cc:**

Mr. Pete Smith

Cllr. Gareth Streeter

Cllr. Sue Bennett

Cllr. Richard Chatterjee

Head of Development Management (Croydon LPA)

Shirley North Ward Councillor

Shirley North Ward Councillor

Shirley North Ward Councillor

**Bcc:**

MORA

Local Affected Residents

Executive Committee