



To: Case Officer – Mr Robert Lester
Development Environment
Development Management
6th Floor
Bernard Weatherill House
8 Mint Walk
Croydon
CR0 1EA

From:
Monks Orchard Residents' Association
Planning

Email: dmcomments@croydon.gov.uk
Development.management@croydon.gov.uk
robert.lester@croydon.gov.uk

14th March 2019
Emails: planning@mo-ra.co
chairman@mo-ra.co
hello@mo-ra.co

Reference: 19/00783/FUL
Application Received: Tue 19 Feb 2019
Application Validated: Tue 19 Feb 2019
Address: 32 Woodmere Avenue Croydon CR0 7PB
Proposal: Demolition of the existing property and the erection of a replacement detached two storey building with accommodation in the roof-space, comprising 7 self-contained flats (2 x 1 bedroom, 3 x 2 bedroom and 2 x 3 bedroom) with 5 off street car parking spaces, bike store, integrated refuse store and site access.
Status: Awaiting decision
Case Officer: Robert Lester
Consultation Close: Sun 24 Mar 2019
Deadline determination: Tue 16 Apr 2019

Dear Mr Lester

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).

On behalf of our members and local residents we object to the above-mentioned planning application development proposal on the following grounds. We only object when proposals do not comply with current adopted planning policies which are designed to minimise overdevelopment and retain the local character within acceptable constraints. **The type face with green background are current adopted Planning Policies.**

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 6.13 Parking](#)

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).

The proposed development has the following parameters:

Site Area	0.06	ha
Existing Dwellings	1	
Existing Housing Density	16.67	u/ha
Existing Bedroom	3	
Existing Bed Spaces	5	Assumed
Existing Bed Spaces per hectare	83.33	bs/ha
Number of New Dwellings	7	Units
New Housing Density	116.67	u/ha
Habitable Rooms	21	hr
New Residential Density hr/ha	350.00	hr/ha
New Residential Density bs/ha	366.67	bs/ha
Average Hr/ha	3.0	hr/ha
New Bed Spaces	22	
PTAL (Base Year)	1a	
PTAL (Forecast 2031)	1a	
Car Parking provision	5	
Car Parking per occupant	0.23	

Fig 1 – Proposed Development Parameters

Analysis of proposal against current Adopted 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 $21/0.06 = 350.00$ hr/ha. The PTAL for the locality is **1a** (i.e. Numerically ≈ 0.66). The Residential Density range recommended for a Suburban Setting at **PTAL 1a** is between **150 hr/ha to 200 hr/ha**. However, the proposed development has **Residential Density** of **350.00 hr/ha** which is the **very highest** in the range of **PTAL 4 to 6** appropriate for Residential Densities in the range **200 hr/ha to 350hr/ha**.

Assuming the incremental **PTAL** and **Residential Densities** over the ranges recommended are approximately linear, then the PTAL at **Residential Density** of **350 hr/ha** should be when calculated at the maximum of **6** and follow the straight-line graph of: $y = mx + c$

where m = slope, y = Residential Density, x = PTAL and c = y intercept when $x = 0$

Then, $350 = \left(\frac{\Delta y}{\Delta x}\right)x - 100 = \left(\frac{350-200}{6-4}\right)x - 100$; which gives: $\frac{350+100}{75} = x = 6.00 = PTAL$
i.e. the maximum possible within the designated ranges.

In addition, assuming the incremental **PTAL** and **Housing Density** ranges are approximately linear over the ranges, the **Housing Density at 7/0.06 u/ha = 116.67 u/ha** with an average habitable rooms per unit of $21/7 = 3.0hr/u$ requires a PTAL to be in the range of 50 u/ha to 75 u/ha when the actual PTAL is also in the range 4 to 6 as can be shown by the formula: $y = mx + c$

where m = slope, y = Housing Density, x = PTAL and c = y intercept when $x = 0$.

Then, $116.67 = \left(\frac{\Delta y}{\Delta x}\right)x - 50 = \left(\frac{130-70}{6-4}\right)x - 50$; which gives: $\frac{116.67+50}{30} = x = 5.556 = PTAL$

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 to 3	4 to 6 RD(6) & HD(5.56)
Suburban	150–200 hr/ha	150–250 hr/ha	200–350 hr/ha (350 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 (3.0hr/unit)	50–75 u/ha	50–95 u/ha	(116.67 u/ha) 70–130 u/ha

Fig 2 – Extract from London Plan Policy 3.4 Optimising Housing Potential - Table 3.2

MORA Comment:

This can be shown at Fig 2 above which is an extract from the London Plan Density Matrix Table 3.2 at a **suburban setting** to illustrate that the **Residential Density** of the proposed development is **totally inappropriate at 350hr/ha** for the locality which has a **PTAL of 1a** (≈ 0.66) when it **actually requires a PTAL of 6.00** i.e. the maximum PTAL in the ranges shown on Table 3.2. The appropriate ranges for **Residential Densities at this setting and PTAL 1a** with an average of **3.0 hr/u** are shown in **WHITE Text**.

Similarly, a **Housing Density of 116.67u/ha** is totally inappropriate for a locality of PTAL 1a but would actually require a **PTAL of 5.56** – in the highest range **4 to 6**, but the locality has a **PTAL of 1a** in the lowest range at a suburban setting. The appropriate ranges for Housing Densities at this setting and **PTAL of 1a** with an average of **3.0 hr/u** are shown in **WHITE Text**.

The applicant has given **NO justification** or reasoning for **NOT meeting the current adopted London Plan Policy 3.4 on Optimising Housing Potential** within the broad density ranges and constraints given at Table 3.2 to ensure that future occupants of the proposed developments have **adequate accessibility to local Public Transport Infrastructure**.

We therefore **object to this proposed development** on grounds of overdevelopment and that the **Residential Density of 350hr/ha is totally inappropriate at PTAL 1a** and is more appropriate at a suburban setting with **PTAL of 6.00** (i.e. the maximum public transport accessibility possible) and also that the **Housing Density at 116.67u/ha** in the highest range possible, **is inappropriate** at a suburban setting with **PTAL at 1a** and is more appropriate at a locality of **PTAL of 5.56**.

As Stated in the **current adopted London Plan Policy 3.4 Optimising housing potential, Development Proposals** which **compromise this policy, "should be resisted"**. This is the current adopted London Plan Planning Policy. The applicant has **NOT** provided any **justification** or reasoning for deviating from the recommended **"broad"** ranges as required of the current adopted **London Plan Policy** and as qualified in the **London Plan Housing Supplementary Planning Guidance (March 2016)**.

We therefore request that this application be refused on grounds of inappropriately **exceptionally high Housing and Residential Densities** at the proposed site location as defined by the **London Plan Policy 3.4 Optimising Housing Potential**, which would result in future occupants NOT having adequate accessibility to local Public Transport Infrastructure services.

Note: As a result of our **Stage 1 Complaint Ref: CASE4893951**, we have become apparent that Planning Officers are basing determinations on the emerging **London Plan Policies** on Density which assumes the **deletion of the Density Matrix Table 3.2**. This assumption could be premature as the London Plan is currently undergoing Examination in Public (EiP) and representations by participants show that it is far from decided. Nevertheless, the emerging Policy at **Policy D6 Optimising Housing Density** would replace the current adopted policies on housing densities and **Policy D6** and the supporting **Policy D2 Delivering Good Design** requires analysis of the various particular contributing factors to **optimise density** and considers the site, local characteristics, PTAL and requires particular consideration to the evaluation criteria to determine the optimal development density. (i.e. more complex than the current adopted Density Matrix).

If the Case Officer makes a determination based on the emerging **Policy D6 and Policy D2** we would expect to see the analysis of the evaluation and the evaluation criteria as required of the draft **Policy D6** in the case officers report to support the decision. It is NOT appropriate or professional to just ignore the Density Matrix without fully considering the substance of the replacement **Policies D6 and D2**.

London Plan Policy 3.5 Quality and Design of Housing Developments

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](#).**

MORA Comment:

In order to meet the strategic objectives, set out in the London Plan Policy 3.5, specific requirements for minimum space Standards for New Dwellings have been defined as set out in Table 3.3. The supplied plans at drawing Number PP02-07 Landscape Plan shows amenity Space for **Unit 1** at **26.5m²** and **Unit 2** at **17m²**. As there is no measure graticule given on the plans it is not possible to confirm this from scaling from the supplied plans but observations seem to indicate that these dimensions are questionable and could be reversed.

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	2 storey	3 storey dwellings	
		dwellings	dwellings		
1b	1p	39 (37)*			1
	2p	50	58		1.5
2b	3p	61	70		2
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	

Fig 3 – Extract from London Plan Policy 3.5 Table 3.3 Minimum Space Standards.

Units	Habitable Rooms (hr)	Bedrooms	Bed Spaces (occupants)	GIA Offered (sq.m.)	GIA Required (sq.m.)	Storage Offered (sq.m.)	Storage Required (sq.m.)	Private Amenity Balcony (sq.m.)	Private Amenity Required (sq.m.)
Unit 1	4	3	4	80	74	0	2.5	26.5	7.0
Unit 2	4	3	4	77	74	0	2.5	17	7.0
Unit 3	2	1	2	52	50	0	1.5	0	5.0
Unit 4	3	2	3	62	61	0	2.0	6	6.0
Unit 5	2	1	2	51	50	0	1.5	6	5.0
Unit 6	3	2	3	65	61	0	2.0	5	6.0
Unit 7	3	2	4	70	70	0	2.0	6	7.0
Total	21	14	22	457	440	0	14.0	66.5	43.0

Fig 4 – Assessment of offered proposal against Minimum Space Standards

For Unit 1, a 3-Bed 4-person, single storey dwelling requires 2.5m² Storage; for Unit 2, a 3-Bed, 4-person, single storey dwelling requires 2.5m² Storage; for Unit 3, a 1-bed, 2-person, 2-storey dwelling requires 1.5m² storage; for Unit 4, a 3-bed, 2-person, single storey dwelling requires 2.0m² Storage; for Unit 5, a 1-bed, 2-person, single storey dwelling requires 1.5m² storage; for Unit 6, a 2-Bed, 3-person, single storey dwelling requires 2m² Storage and for Unit 7, a 2-Bed, 4-person Single Storey Dwelling requires 2m² Storage. None of **Units 1 to 7** have any allocated **Storage Space** for future occupants and is therefore **non-compliant** to the current adopted **London Plan Policy 3.5 Quality and design of housing developments** Table 3.3 Minimum Space Standards for new dwellings. These issues are tabulated at Figs 3 & 4 above.

We object to this proposed development on the grounds that the proposed dwelling does NOT fully meet the required minimum space standards as required by the current adopted London Plan Policy 3.5 as defined at Table 3.3.

In addition, **Unit 3** has **no** allocated **Private Amenity Space**; **Units 6** and **Unit 7** are deficient by **1m²** each of **Private Amenity Space** as required by the current adopted **London Plan Policy 3.5 Minimum Space Standards for New Dwellings**. These issues are also tabulated at Figs 3 & 4 above.

We therefore **object** to this proposed development on grounds of **inadequate storage space** allocation and **deficiencies in Private amenity Space** in contravention of the adopted **London Plan Policy 3.5 Quality and design of housing developments** Table 3.3 Minimum Space Standards for new Dwellings and which fails to meet the strategic objectives of the current adopted **London Plan Policy 3.5**.

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.

London Plan Policy 6.13 Parking

Policy

Strategic

A The Mayor wishes to see an appropriate balance being struck between promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use.

B The Mayor supports Park and Ride schemes in outer London where it can be demonstrated they will lead to overall reductions in congestion, journey times and vehicle kilometres.

Planning decisions

C The maximum standards set out in [Table 6.2](#) in the Parking Addendum to this chapter **should be the basis for considering planning applications** (also see Policy [2.8](#)), informed by policy and guidance below on their application for housing in parts of **Outer London with low public transport accessibility (generally PTALs 0-1)**.

D In addition, developments in all parts of London must:

a ensure that **1 in 5 spaces** (both active and passive) **provide an electrical charging point** to encourage the uptake of electric vehicles

b provide parking for disabled people in line with [Table 6.2](#)

c meet the minimum cycle parking standards set out in [Table 6.3](#)
d provide for the needs of businesses for delivery and servicing.

MORA Comment:

The proposed development locality has PTAL of 1a at base year and is forecast to remain at PTAL 1a until at least 2031. It is therefore unacceptable to have a parking allocation of just **5 spaces for 22 occupants** giving a parking allocation of **0.23 spaces per occupant** at a locality of **PTAL 1a**. Any Overspill car parking would be either in **Pipers Gardens** which is very narrow (**4.7m** wide as measured on Google Earth) or in **Woodmere Avenue** between two nasty bends. The Standard car parking width of **2.4m** requires access road width of minimum **5m** to allow passing clearance. Therefore, it would be inappropriate for any overspill parking in Pipers Gardens. Also, the East side of Pipers Gardens (west of the proposed development) has a high **1.8m fence** for an extended length (**≈45m** again as measured on Google Earth) preventing opening of parked vehicle doors abutting the fence. Once parked, the vehicle would be partially blocking vehicular access and exit of residents in Pipers Gardens.

RESIDENTIAL CAR PARKING STANDARDS

Table 6.2 Car parking standards

Parking for residential development						
	PTAL 0 to 1		PTAL 2 to 4		PTAL 5 to 6	
	150-200 hr/ha	Parking provision	150-250 hr/ha	Parking provision	200-350 hr/ha	Parking provision
Suburban	3.8-4.6 hr/unit	35-65 u/ha	35-65 u/ha	Up to 1.5 spaces per unit	45-90 u/ha	Up to one space per unit
	3.1-3.7 hr/unit	40-65 u/ha	40-80 u/ha	Up to 1.5 spaces per unit	55-115 u/ha	Up to one space per unit
	2.7-3.0 hr/unit	50-75 u/ha	50-95 u/ha	Up to one space per unit	70-130 u/ha	Up to one space per unit
Urban	150-250 hr/ha		200-450 hr/ha		200-700 hr/ha	
	3.8-4.6 hr/unit	35-65 u/ha	45-120 u/ha	Up to 1.5 spaces per unit	45-185 u/ha	Up to one space per unit
	3.1-3.7 hr/unit	40-80 u/ha	55-145 u/ha	Up to one space per unit	55-225 u/ha	Up to one space per unit
	2.7-3.0 hr/unit	50-95 u/ha	70-170 u/ha	Up to one space per unit	70-260 u/ha	Up to one space per unit
Central	150-300 hr/ha		300-650 hr/ha		650-1100 hr/ha	
	3.8-4.6 hr/unit	35-80 u/ha	65-170 u/ha	Up to one space per unit	140-290 u/ha	Up to one space per unit
	3.1-3.7 hr/unit	40-100 u/ha	80-210 u/ha	Up to one space per unit	175-355 u/ha	Up to one space per unit
	2.7-3.0 hr/unit	50-110 u/ha	100-240 u/ha	Up to one space per unit	215-405 u/ha	Up to one space per unit

Maximum residential parking standards			
number of beds	4 or more	3	1-2
parking spaces	up to 2 per unit	up to 1.5 per unit	less than 1 per unit

Notes:
All developments in areas of good public transport accessibility (in all parts of London) should aim for significantly less than 1 space per unit
Adequate parking spaces for disabled people must be provided preferably on-site³
20 per cent of all spaces must be for electric vehicles with an additional 20 per cent passive provision for electric vehicles in the future.
In outer London areas with low PTAL (generally PTALs 0-1), boroughs should consider higher levels of provision, especially to address 'overspill' parking pressures.

Fig 5 – London Plan Policy 6.13 – Residential Parking Standards

Alternative overspill on Woodmere Avenue at this vicinity would be between two very dangerous bends and would be hazardous to other motorists, commercial and/or delivery vehicles. Thus, any overspill parking would be inappropriate and would be contrary to **London Plan Policy 6.11 Smoothing traffic flow and tackling congestion**.

The plans show one disabled car parking bay but the design and Access Statement or plans do not show any electric charging bay provision as required at **London Plan Policy 6.13 sub para D a)** which states proposals should “ensure that 1 in 5 spaces (both active and passive) provide an electrical charging point to encourage the uptake of electric vehicles.”

It is noted that the emerging **Draft New London Plan at Table 10.3** has reduced residential parking at PTAL’s 0 to 1, to 1.5 spaces per dwelling which in this proposal would require a minimum of **10 Parking Bays**. However, this Draft Plan is subject to **Examination in Public (EIP)** by the **Planning Inspectorate** and is unlikely to be adopted until late **2019 early 2020**.

The current adopted **London Plan Policy 6.13 Parking Standards** given at **Table 6.2** (See Fig 5) provides suburban residential Parking Standards which at **PTAL 1a** allows up to **2 parking bays per dwelling**. The London Plan also acknowledges that in Outer London Boroughs with **low PTAL** (generally PTAL’s 0 to 1), boroughs should consider **higher levels of provision**, especially to address ‘overspill’ parking pressures. This would require **14 car parking spaces** whereas only **5** are provided. This is exactly the situation at this location as currently on-street parking around this locality is dangerous especially along Woodmere Avenue between the two bends.

There is no legislation to prevent car ownership or to restrict occupants from owning light vans for commercial for business activities which requires local parking overnight. We therefore object to this proposed development on grounds of inadequate parking provision of **5 bays** with allocation of only **0.23 bays per occupant**, in a locality of **PTAL 1a** and at an area of local parking medium stress between two dangerous bends in Woodmere Avenue. Recent piecemeal development in the MORA Post Codes has increased local residential population by **328** (including other recent current proposals awaiting determination and the 17 additional persons resulting from this application if approved – see Fig 6 Below). This requires an increase in local PTAL to meet the increased **Housing and Residential Densities** in the locality.

Location	Existing Dwellings	Approx Existing Occupants	New Proposed Dwellings	Habitable Rooms (hr)	New Bed Spaces or Occupants	Additional Occupants	Site Area (ha)	New Housing Density (u/ha)	Residential Density (hr/ha)	PTAL for Residential Density	Residential Density (bs/ha)*	Car Parking	Car Parking per Occupant	Actual PTAL
40 Orchard Ave	1	2	8	30	24	22	0.1236	64.75	242.82	2.93	194.25	9	0.3750	2
68-70 Orchard Ave	2	4	9	68	64	60	0.3128	28.77	217.39	2.32	204.60	18	0.2813	1b = 1.33
41-43 Orchard Way	2	4	9	32	32	28	0.1470	61.22	217.69	1.35	217.69	9	0.2813	1a = 0.66
393 Wickham Road	1	5	7	24	22	17	0.0758	92.35	316.62	3.66	290.24	7	0.3182	2
98-100 Orchard Way	2	4	9	31	34	30	0.1370	65.69	226.28	1.53	248.18	9	0.2647	1a = 0.66
263 Wickham Road	1	5	8	24	24	19	0.0646	123.88	371.63	4.22	371.63	9	0.3750	2
8-10 The Glade	2	4	9	30	30	26	0.1396	64.47	214.90	1.30	214.90	9	0.3000	1a = 0.66
64 Woodmere Ave	1	4	5	30	26	22	0.2900	17.24	103.45	0.66	89.66	14	0.5385	1a = 0.66
33 Orchard Way	0	0	1	5	5	5	0.0601	16.64	83.19	0.66	83.19	2	0.4000	1a = 0.66
141b Wickham Road	0	0	1	3	4	4	0.0200	50.00	150.00	3.00	200.00	0	0.0000	3
2-4 Woodmere Close	0	2	1	6	5	3	0.0367	27.25	163.49	0.66	136.24	10	2.0000	1a = 0.66
6-8 Woodmere Close	0	0	1	6	6	6	0.0400	25.00	150.00	0.66	150.00	4	0.6667	1a = 0.66
10-12 Woodmere Close	0	0	1	6	6	6	0.0378	26.46	158.73	0.66	158.73	4	0.6667	1a = 0.66
48 Wickham Avenue	0	0	1	6	5	5	0.0764	13.09	78.53	2.00	65.45	1	0.2000	2
20-22 The Glade	0	0	2	10	12	12	0.0370	54.05	270.27	4.94	324.32	4	0.3333	1a = 0.66
9a Orchard Rise	1	0	9	32	41	41	0.2011	44.75	159.12	0.66	203.88	12	0.2927	1a = 0.66
2a Round Grove	0	0	1	4	4	4	0.0188	53.28	213.11	2.63	213.11	1	0.2500	1a = 0.66
197 Shirley Road	0	0	1	2	1	1	0.0067	149.25	298.51	5.31	149.25	0	0.0000	2
32 Woodmere Avenue	1	5	7	21	22	17	0.0600	116.67	350.00	6.00	366.67	5	0.2273	1a = 0.66
Total	14	39	90	370	367	328	1.8849	1094.81	3985.73	45.15	3881.98	127	7.7705	
Average							0.0992	57.62	209.78	2.38	204.31	6.68	0.41	

Fig 6 – Recent Local redevelopments and infill developments in the MORA Area

The Ward is served by only one single-decker, 40-seater, **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. One additional service is dedicated for school children. The additional cumulative local development (See Fig 6 above) 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.

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.**

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, HEIGHT, MASSING, and DENSITY; the Croydon Local Plan Does **NOT** provide **any** guidance whatsoever or any greater clarity for applicants on either “SCALE, HEIGHT, MASSING, and DENSITY” – **How is it possible to respect these parameters if there is NO guidance?** Also, these characteristics are required as defined 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)

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** in addition to the guidance required at **NPPF para 16 d)** and **NPPF para 122 – Achieving appropriate Densities**.

Thus, **MORA comments** on **Croydon Plan Policy DM10.1** and **para 6.37** are covered by our response above relating to **London Plan Policy 3.4 Optimising Housing Potential**.

DM10.2 Proposals should create clear, well defined and designed public and private spaces. **The Council will only consider parking within the forecourt of buildings in locations where the forecourt parking would not cause undue harm to the character or setting of the building and where forecourts are large enough to accommodate parking and sufficient screening without the vehicle encroaching on the public highway.** The Council will support proposals that incorporate cycle parking within the building envelope, in a safe, secure, convenient and well-lit location. Failing that, the council will require cycle parking to be located within safe, secure, well lit and conveniently located weather-proof shelters unobtrusively located within the setting of the building.

MORA Comment:

The parking provision is all on the **forecourt** of the proposed development which is contrary to **Policy DM10.2** although screened by Camellia Shrubs. It is not stated the variety of Camellia shrub or height of a matured specimens to afford adequate screening to meet the policy requirement.

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

- a. Is of high-quality design, and enhances and respects the local character;
- b. Provides functional space (the minimum width and depth of balconies should be 1.5m);
- c. Provides a **minimum amount of private amenity space of 5m² per 1-2 person unit and an extra 1m² per extra occupant thereafter;**

MORA Comment:

The Balconies are placed on the North facing elevation partially occupying accommodation floor space are unlikely to ever have direct sunlight and so would be forever in the shade. This is due to the configuration of the proposed dwelling on the available plot. This configuration therefore does not give future occupants of Units 3 to 7 any opportunity to privately sit in the sunshine, ever. They will have to use the communal garden area. The deficiencies in the allocation of private amenity space required at **Policy DM10.4 c)** is given as comments to the **London Plan Policy 3.5 minimum space standards** listed above and are equally non-compliant to **Policy DM10.4 c)**.

DM10.5 In addition to the provision of private amenity space, proposals for new flatted development and major housing schemes will also need to incorporate high quality communal outdoor amenity space that is designed to be flexible, multifunctional, accessible and inclusive.

MORA Comment:

Policy DM10.5 is deficient in identifying the appropriate area allocated to “**communal outdoor amenity space**” in that the amount of space per occupant for any proposed development is NOT specified.

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



Thus, the **Croydon Local Plan Policy** does **NOT** specify the appropriate ‘allocation’ of “communal outdoor amenity space” and therefore the policy is **NOT deliverable** and NOT complaint to **NPPF para 16** which states:

16. Plans should:

- b) be prepared positively, in a way that is aspirational but deliverable;
- c) be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisation’s, businesses, infrastructure providers and operators and statutory consultees;
- d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;

Without specifying the allocation per occupant, the **Croydon Local Plan** at **DM10.5** does not provide adequate guidance for applicants to meet the policy and the policy does **NOT** meet the guidance required by **NPPF Para 16 d)**.

DM10.6 The Council will support proposals for development that ensure that;

- a. The amenity of the occupiers of adjoining buildings are **protected**; and that
- b. They do not result in **direct overlooking** at close range or habitable rooms in main rear or private elevations; and that
- c. They do not result in direct overlooking of **private outdoor space** (with the exception of communal open space) within **10m perpendicular** to the rear elevation of a dwelling; and that
- d. Provide adequate **sunlight and daylight to potential future occupants**; and that
- e. They do not result in significant loss of existing sunlight or daylight levels of adjoining occupiers.

MORA Comment:

The proposed development has obscure glazed windows on the first floor East facing elevation which meets **Policy DM10.6 b) and c)**. However, as the balconies are on a North facing elevation, the configuration does NOT allow adequate sunlight to potential occupants at balconies of Units 3 to 7 and therefore does not comply with **Policy DM10.6 d)**.

The emerging Supplementary Planning Document SPD2, **Chapter 2 Suburban Residential Developments at Para 2.11 Heights & Depths Projecting beyond Building Lines** at pages **36 & 37** describes a **45° rule** for new developments with adjacent properties. Although the offered drawings do not provide a rear elevation of the adjacent property at **30 Woodmere Avenue, Drawing PP02-02** illustrates the **45°** from middle of the window of the adjacent dwelling which can be estimated transposed to the front of the property to be about the Centre of the street door as shown below, as **30 Woodmere Avenue** is tapered, the actual distance would be closer to the proposed development at the rear of the adjacent property and thus even worse than depicted on the diagram shown at **Fig 7** below. This illustrates that the proposed development **fails to meet the 45° rule on height** in relation to the **adjacent property**. The Case Officer should request the applicant to provide rear elevations with the **45°** projection from the **Centre of the ground**

floor window of the adjacent property to verify compliance or otherwise with the **45° Rule**. This illustrates (at Fig 7) an overbearing nature of the proposed development on the adjacent property at **30 Woodmere Avenue**.



Fig 7 – Illustrations of the 45° Rule regarding adjacent properties

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:

The Council Refuse & Recycling guidance included at:

www.croydon.gov.uk/sites/default/files/articles/downloads/Newbuild_guidance.pdf

gives requirements for new developments at **Section 4 - Flats with 5 or more units**.

As this Waste and Recycling Planning Policy Document was published in August 2015 and Edited in October 2018, it is not understood why the **Policy DM13** does NOT embody these requirements?

However, the London Borough of Croydon recommends that developers follow this guidance and that Flats with up to 9 units will require an **1100ltr for general waste**, using this as a base the Council recommend **122.2 ltr's per flat**.

It is understood that there must be a minimum of **150mm clearance** around and between each bin within a storage area. Where there is more than **one bin** within a storage area, there must be **2m clearance in front of each bin** to enable it to be accessed and safely moved without needing to move any of the other containers. The proposed development does not provide this **2m clearance** in front of the bins to allow safe movement.

It is also understood that the access doors to the bin storage must **not open outward** over a **public footway or road**, and should **not** cause any **obstruction** to other accesses when in an open position. The proposed development Refuse Storage doors **DO open outwards** and **DO obstruct access to the Bike sheds** further along the access pathway.

Furthermore, it is understood that all doors and alleys must be at least **2m wide** to allow for safe manoeuvring of bins. The access pathway at the Refuse Store is only **≈1.3m** and this pathway is tapered to **1m** wide at the South East Corner of the building and therefore **Non- Compliant** to this requirement. It should also be clear of any rainwater down pipes and gully's, but these rainwater pipes and gulleys are not shown on the provided plans or documentation. Also, the opened doors to the **Refuse Bins** block the pathway for the operative to move the bins out from the storage area to the refuse vehicle, again in **contravention to the guidance** provided.

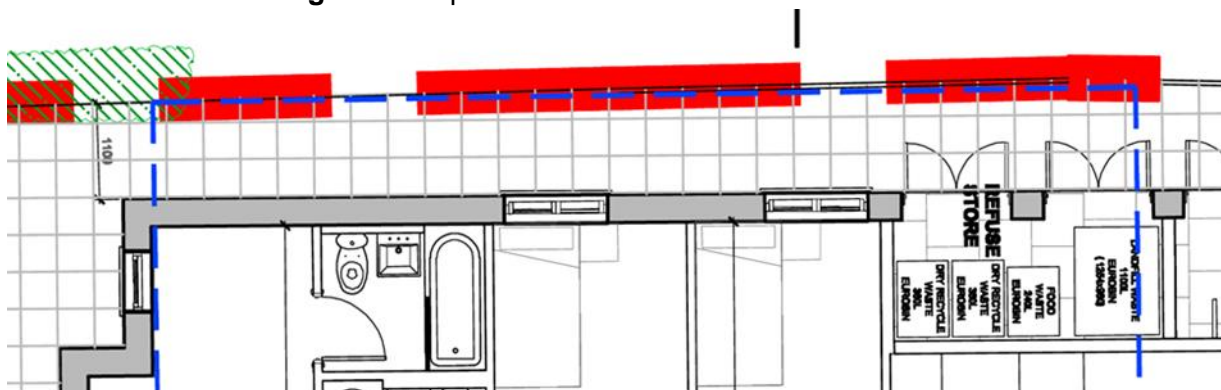


Fig 8 – Refuse and Recycling Facilities with Access Route

The bin storage areas must be located within a specified minimum distance of a point where the collection vehicle can safely stop for loading. The maximum distances that operatives should be required to wheel containers, measured from the furthest point within the storage/collection area to the loading position at the back of the vehicle, should be **no more than 20 metres**. Whereas the distance as measured from the supplied drawing is approximately **30metres**.

It is understood that a water supply, with standard tap fittings be available to the bin storage area to enable washing down of the bins, walls and floor. This requirement is not shown on the plans.

We therefore **object** to this proposed development on grounds that it does **NOT** meet the requirements of **Policy DM13** or **Council Guidance on Refuse & Recycling for New Developments** as published by **Croydon Council** with regard to **Storage Area Capacity, Access and location within the building envelope.**

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** (See **Fig 6** – Recent Local redevelopments and infill developments in the MORA Area), has increased local residential population by **328**. 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** single decker could not cope during the school run congestion period.

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;**

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

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 Croydon Local Plan for **Residential Parking** is more stringent than the **London Plan Policies** in that the Policy is as per **London Plan Table 6.2** however, with no provision for higher levels of car parking in areas with low Public Transport Accessibility Levels, which ignores the reasoning for additional parking provision to alleviate overspill on-street parking. Perhaps this is why Croydon is suffering increased traffic congestion in residential areas as previously stated there is no legislation preventing car ownership or the ownership of light vans for business or commercial activities.

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 is an overdevelopment for the locality and does **NOT respect the existing residential and housing densities.** and therefore is non-compliant to **Policy: Shirley Place Homes para 11.200 & Character, Heritage and Design para 11.202.**

There has been “**absolutely no improved access or transport links**” in **Shirley** with increased residential occupancy of 328 persons resulting from in-fill and redevelopment and therefore the policy **Shirley Place Transport para 11.205 has NOT been fulfilled.**

Conclusions:

Although the proposed development presented is architecturally acceptable (see Fig 9 below) the proposal **fails** on a number of **design requirement Planning Policies** which results in an **overdevelopment of the proposal** for the locality and would not provide acceptable living conditions for future occupants. We therefore **object** to this proposed development on grounds of over-development and non-compliant to the **current adopted London Plan Policy 3.4 Optimising Housing Potential** due to **excessive Residential Density of 350hr/ha** and

excessive Housing Density 116.67 u/ha at a locality of **PTAL 1a**. **without Justification**. The current adopted **London Plan Policy** indicates that developments which **compromise this policy should be refused**.



Fig 9 Proposed Development - Front Elevation

We object to this proposed development on the grounds that the proposed dwelling does **NOT** fully meet the required **minimum space standards** as required by the current adopted **London Plan Policy 3.5** as defined at **Table 3.3** with respect to no **Private Amenity Space** for **Unit 3** and that **Units 6** and **Unit 7** are deficient by **1m²** each of **Private Amenity space**. Also, the proposal has **NO** provision of **storage space** for any of the **Units 1 to 7** which is a requirement of **London Plan Policy 3.5. minimum space standards**.

We **object** to this proposed development on grounds of **inadequate parking provision** and **non-compliance to the London Plan Policy 6.13 for Outer London Boroughs** which would result in overspill on-street parking reducing traffic Flow and contribute to traffic congestion and is therefore **non-compliant to London Plan Policy 6.11**.

We object to the proposed development on grounds of non-compliance to **Croydon Plan Policy DM10.1 and Para 6.37** which although recognises a need for providing detailed guidance on **SCALE, HEIGHT, MASSING, and DENSITY**; the Croydon Local Plan Does **NOT** provide any guidance whatsoever or any greater clarity for applicants on either “**SCALE, HEIGHT, MASSING, and DENSITY**” as required by the **New NPPF para 16 and para 122**. Thus, **MORA comments on Croydon Plan Policy DM10.1 and para 6.37** are covered by our response to the **current adopted London Plan Policy 3.4 Optimising Housing Potential**.

We object to this proposed development on grounds that the parking provision is all on the **forecourt** of the proposed development which is contrary to **Policy DM10.2**; that the configuration does not allow **adequate sunlight for Balconies** of **units 3 to 7** and the **deficiencies** in the allocation of **private amenity space as required of Policy DM10.4 c)** and as of the current adopted **London Plan Policy 3.5 minimum space standards** are equally **non-compliant to Policy DM10.4 c)**.



We object to the proposed development on grounds that it does **NOT meet the 45° Rule** on height as measured from the adjacent dwelling ground floor window as required by the emerging **Supplementary Planning Document SPD2, Chapter 2 Suburban Residential Developments at Para 2.11 Heights & Depths Projecting beyond Building Lines at pages 36 & 37.**

We object to this proposed development on grounds that it does **NOT** meet the requirements of **Policy DM13** or **Council Guidance on Refuse & Recycling for New Developments** as published by **Croydon Council** with regard to **Refuse Storage Area Capacity, Access to Storage**, width of passageway and **pull distance from storage area to refuse vehicle** and thus the location within the building envelope.

We conclude that the proposed development is an overdevelopment for the locality and does **NOT** respect the existing **residential and housing densities** and therefore is non-compliant to **Policy: Shirley Place Homes para 11.200 & Character, Heritage and Design para 11.202**. There has been **“absolutely no improved access or transport links” in Shirley** with increased residential occupancy of **328 persons** resulting from in-fill and redevelopment and therefore the policy **Shirley Place Transport para 11.205** has **NOT** been fulfilled.

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