



To:
Mr Christopher Grace - Case Officer
Development and Environment
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Email:
Development.management@croydon.gov.uk

From:
Monks Orchard Residents'
Association Planning Officer

3rd April 2019
Emails: planning@mo-ra.co
chairman@mo-ra.co
hello@mo-ra.co

Reference: 19/00131/FUL
Application Received: Thu 10 Jan 2019
Application Validated: Sun 10 Mar 2019
Address: 17 Orchard Avenue Croydon CR0 8UB
Proposal: Demolition of existing detached house, erection of 2-storey building with further floor of accommodation in roof-space comprising 1 x 1 bedroom flat, 3 x 2-bedroom flats and 1 x 3 bedroom flat, formation of vehicular access and provision of 4 associated parking spaces and refuse storage
Case Officer: Christopher Grace
Consultation Expiry: Wed 10 Apr 2019
Target Decision: Sun 05 May 2019

Dear Mr Grace

We are a local Residents' Association, registered with the Croydon Local Planning Authority (LPA), representing members in the Shirley North Wards, in the London Borough of Croydon. On behalf of our members and local residents we object to the above-mentioned planning application development proposal on the following grounds. We understand the need for additional housing but take the view that new housing developments **must** meet the current and emerging planning policies **to ensure future occupants have acceptable living standards**. We only object when proposals do not comply with current adopted or emerging 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](#)

Emerging Draft New London Plan Policies:

Chapter 2 Spatial Development Patterns

Chapter 3 Design

Policy D1 London's form and characteristics

Policy D2 Delivering good design

Policy D5 Accessible housing

Policy D6 Optimising housing density

Chapter 10 Transport

Policy T6.1 Residential parking

Croydon Local Plan adopted and emerging Planning 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).

Supplementary Planning Guidance SPD2 Suburban Residential Developments

The proposed development has the following parameters:

17 Orchard Avenue - Application										
Site Area		710	sq.m							
		0.071	ha							
	Floor	Habitable Rooms	Bedrooms	Bed Spaces	Storage Space (sq.m.)	Table 3.3 Storage (sq.m.)	GIA (sq.m.)	Table 3.3 GIA (sq.m.)	Amenity Space (sq.m.)	Table 3.3 Private Amenity (sq.m.)
Unit 1	Ground	4	3	4	1.15	2.5	95.60	74.00	≈52	7
Unit 2		2	1	2	0	1.5	50.00	50.00	≈32	5
Unit 3	1st	3	2	4	0	2	71.70	70.00	5.5	7
Unit 4		3	2	4	0	2	70.00	70.00	5.5	7
Unit 5	2nd	3	2	4	0.675	2	80.00	70.00	2.5	7
Totals		15	10	18			367.30	334.00		
Average		3								
Housing Density	70.42	u/ha	New London Plan Policy D6							
Residential Density	211.27	hr/ha	Post Code		CRO 8UB					
Bed Spaces/ha	253.52	bs/ha	Dwellings in Post Code Area		23		VOA			
PTAL (Base Year)	2		Post Code Area		1.50		ha (Google Earth)			
PTAL Forecast 2031	2		Housing Density for Post Code		15.33		u/ha			
Car Parking	4		Demolished Dwellings		1					
Disabled Parking	0		New Dwellings		9					
Electric Charging points			New Dwellings in Post Code		31					
Parking/person	0.22		New Housing Density for area		20.67		u/ha			
Communal Open Space	150	sq.m.	Percentage Increase in Density		34.83		%			
Open Space/ person	8.33	sq.m.								

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

NPPF Para 48:

48. Local planning authorities may give weight to relevant policies in emerging plans according to:

- the stage of preparation of the **emerging plan** (the more advanced its preparation, the greater the weight that may be given);
- the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given)²².

The Draft New London Plan is currently undergoing Examination in Public (EiP).

The Croydon Supplementary Planning Guidance SPD2 was put before Cabinet on 25th March and to the Full Council on 1st April 2019 for adoption.

The proposed development is within a Focussed Intensification Area



London Plan Policy for Incremental intensification of existing residential areas are within **PTALs 3-6** and within **800m** of a rail station or town centre boundary and is expected to play an important role in meeting the housing targets for small sites, particularly in outer London. However, this location is **PTAL 2** and therefore considered outside of the requirement for intensification.

Analysis of proposal against current Adopted Planning Policies

Current and Draft New London Plan Policies:

London Plan Policy 3.4 Optimising housing potential

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.**

Table 3.2 Sustainable residential quality (SRQ) density matrix (habitable rooms and dwellings per hectare)			
Setting	Public Transport	Setting	Public Transport
	0 to 1	2 to 3	4 to 6
Suburban	150–200 hr/ha	150–250 hr/ha (211.27 hr/ha)	200–350 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	50–75 u/ha	50–95 u/ha (70.42 u/ha)	70–130 u/ha
Urban	150–250 hr/ha	200–450 hr/ha (211.27 hr/ha)	200–700 hr/ha
3.8–4.6 hr/unit	35–65 u/ha	45–120 u/ha	45–185 u/ha
3.1–3.7 hr/unit	40–80 u/ha	55–145 u/ha	55–225 u/ha
2.7–3.0 hr/unit	50–95 u/ha	70–170 u/ha (70.42 u/ha)	70–260 u/ha

MORA Comment:

The Residential Density of the proposed development is **15/0.071 = 211.27hr/ha**. The PTAL for the locality is **2** which is appropriate for the range 150 to 250 hr/ha and the Housing Density at **5/0.071 is 70.42 u/ha** for PTAL 2 which is in the range 50 to 95 u/ha for a suburban setting and is therefore acceptable densities for this locality as defined by current adopted London Plan Policy 3.4 Optimum Housing Density. **(Proves it can be done if they try!)**

London Plan Policy 3.5 Quality and design of housing developments

A Housing development 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.

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	

MORA Comment:

Unit 2 should be provided with **1.5m²** storage space but has none.

Unit 3 should be provided with **2m²** storage but has none, and should also have **7m²** Private Amenity Space but has only **5.5m²** Private Amenity Space.

Unit 4 should be provided with **2m²** storage spaces but has **none** and should also have **7m²** Private Amenity Space but has only **5.5m²** Private Amenity Space.

Unit 5 should be provided with **2m²** storage but has only **≈0.675m²** storage - and should have **7m²** Private Amenity Space but has only **2.5m²** Private Amenity Space.

Thus, the proposal does **not fully meet London Plan Policy 3.5 minimum space standards for new dwellings** and **should therefore be refused as these deficiencies would be detrimental to the living conditions for occupants for the life of the development**.

Draft London Plan Policies D6, D2 & D1.

D1 Development Plans, area-based strategies and development proposals should address the following:

A. The form and layout of a place should:

1. use land efficiently by optimising density, connectivity and land use patterns ...

B. Development design should:

1. respond to local context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality, including to existing and emerging street hierarchy, building types, forms and proportions. ...

D2

A. **To identify an area's capacity for growth** and understand how to deliver it in a way which strengthens what is valued in a place, boroughs should undertake an evaluation, in preparing Development Plans and area-based strategies, **which covers the following elements:**

1. socio-economic data (such as Indices of Multiple Deprivation, health and wellbeing indicators, **population density**, employment data, educational qualifications, crime statistics)
2. **housing type and tenure**
3. urban form and structure (for example townscape, block pattern, urban grain, extent of frontages, building heights and density)
4. **transport networks** (particularly walking and cycling networks), and public transport connectivity (existing and planned)
5. **air quality and noise levels**
6. open space networks, green infrastructure, and water bodies
7. historical evolution and heritage assets (including an assessment of their significance and contribution to local character)
8. **topography and hydrology**
9. land availability
10. existing and emerging development plan designations
11. **existing and future uses and demand for new development, including housing requirements and social infrastructure.**
12. **Determining capacity for growth.**

B. The findings of the above evaluation (part A), taken together with the other policies in this Plan should inform **sustainable options for growth** and be used to establish the **most appropriate form of development for an area in terms of scale, height, density, layout and land uses. The**

outcome of this process must ensure the most efficient use of land is made so that development on all sites is optimised.

Design analysis and visualisation

- C. Where appropriate, visual, environmental and movement modelling/assessments should be undertaken to analyse potential design options for an area, site or development proposal. These models, **particularly 3D virtual reality and other interactive digital models**, should, where possible, be used to inform and engage Londoners in the planning process.

Design quality and development certainty

- D. Masterplans and design codes should be used to help bring forward development and ensure it delivers high quality design and place-making based on the characteristic set out in Policy D1 London's form and characteristics.

Design scrutiny

- E. **Design and access statements** submitted with development proposals **should provide relevant information to demonstrate the proposal meets the design requirements of the London Plan.**

D6

A Development proposals must make the most efficient use of land and be developed at the optimum density. The optimum density of a development should result from a **design-led approach to determine the capacity of the site**. Particular consideration should be given to:

the site context, its connectivity and accessibility by walking and cycling, and existing and **planned public transport (including PTAL)** the capacity of **surrounding infrastructure**.

Proposed residential development that does not demonstrably optimise the housing density of the site in accordance with this policy should be refused.

B The capacity of existing and planned physical, environmental and social infrastructure to support new development should be assessed and, where necessary, improvements to infrastructure capacity should be planned to support growth.

The density of development proposals should be based on, and linked to, the provision of future planned levels of infrastructure rather than existing levels.

The ability to support proposed densities through encouraging active travel should be taken into account.

Where there is currently insufficient capacity of existing infrastructure to support proposed densities **(including the impact of cumulative development)**, boroughs should work with applicants and infrastructure providers to ensure that sufficient capacity will exist at the appropriate time. This may mean, in exceptional circumstances, **that development is contingent on the provision of the necessary infrastructure and public transport services and that the development is phased accordingly.**

The higher the density of a development, the greater the level of scrutiny that is required of its design, particularly the qualitative aspects of the development design described in **Policy D4 Housing quality and standards**, and the proposed ongoing management.

The following measures of density should be provided for all planning applications that include new residential units:

- 1) number of units per hectare
- 2) number of habitable rooms per hectare
- 3) number or bedrooms per hectare
- 4) number of bedspaces per hectare.

These built form and massing measures should be considered in relation to the surrounding context to help inform the optimum density of a development.

MORA Comment:

Using the emerging draft New London Plan Policies D6, D2 & D1 requires a complex analysis and the only available information to community groups to assess the appropriateness for Optimal Densities is the local current and planned PTAL and the Local Housing Density. Although Policy D6 B Items 1 to 4 are requested and can be calculated, the analysis of these parameters to establish Optimum Density is very subjective. All other parameters are undefined and are subject to various interpretations. The assessment methodology of determining optimum density by Policy D6 requires built form and massing measures should be considered in relation to the surrounding context to help inform the optimum density of a development (the only information in this regard is the Housing Density of the Post Code). This and other supporting Policies D1 and D2 need to be clearly informed and elucidated in the case officer's assessment to ensure the application conforms to the policies D6, D2 & D1 and that the decision (for acceptance or refusal) is supported by the Policies' requirements.

From the foregoing D6, D2 & D1 Draft Policies we have assessed the increased **Housing Density for this Post Code Area of ≈1.50ha (Google Earth)** from **23** existing dwellings at **15.33u/ha** to **32** new dwellings at **20.67u/ha** after this proposed development, which is an unacceptable increase of **34.83%** in **Housing Density** at a location of high parking stress at **PTAL 2** and forecast to remain at **PTAL 2** until **2031**. **We consider this is NOT an optimum use of land for this location.**

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 2** at base year and is forecast to remain at **PTAL 2** until at least **2031**. As this location is on a **RED ROUTE** parking restricted area, we believe that off-street parking availability is paramount and that the guidance in the London Plan Residential Parking Policy should be adopted to prevent any requirement for on-street parking. The proposed parking availability of 4 spaces and zero disabled bays is unacceptable at this location.

The **London Plan Policy 6.13 Table 6.2 Residential Parking Standards at Residential Density** in the range **159 hr/ha to 250 hr/ha** and **Housing Density** in the range **50 u/ha to 95 u/ha** requires up to **1.5 car parking spaces per dwelling** which equates to **7.5 spaces**. However, there are only **4 car parking spaces** provided and none are for disabled.

There is no legislation to prevent car ownership or to restrict occupants from owning light vans for commercial or business activities which requires local parking overnight. We therefore object to this proposed development on grounds of inadequate parking provision of only 4 bays with allocation of only 0.22 bays per occupant, in a locality of PTAL 2 and at an area of high stress parking at a locality with double RED ROUTE parking restrictions.

The emerging Draft London Plan at Table 10.3 recommends up to 1 space per dwelling at Outer London Boroughs with PTAL 2

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	35-55 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		55-115 u/ha	
	2.7-3.0 hr/unit	50-75 u/ha	50-95 u/ha		70-130 u/ha	
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	45-165 u/ha	Up to one space per unit
	3.1-3.7 hr/unit	40-80 u/ha	55-145 u/ha		55-225 u/ha	
	2.7-3.0 hr/unit	50-95 u/ha	70-170 u/ha		70-260 u/ha	
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		175-355 u/ha	
	2.7-3.0 hr/unit	50-110 u/ha	100-240 u/ha		215-405 u/ha	

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.

London Plan Policy 6.13 – Residential Parking Standards

Therefore, the proposal is **non-compliant** to **London Plan Policy 6.11 Smoothing traffic flow and tackling congestion** and **London Plan Policy 6.13 Parking Standards Table 6.13**.

Croydon Local Plan adopted Policies:

Croydon Plan DM10: Design and Character

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 2.5m hedging to meet the policy requirement.

There are no Disabled Parking Bays at a locality of High Parking Stress (RED ROUTE) and only 4 parking Bays with no provision for electric charging points.

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:

Unit 3 should also have **7m²** Private Amenity Space but has only **5.5m²** Private Amenity Space.
 Unit 4 should also have **7m²** Private Amenity Space but has only **5.5m²** Private Amenity Space.
 Unit 5 should have **7m²** Private Amenity Space but has only **2.5m²** Private Amenity Space.
 Thus, the proposal does **not fully meet Policy DM10.4 c)** in respect of Private Amenity Space and therefore should be refused **as these deficiencies would be detrimental to the living conditions for occupants for the life of the development.**

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. The actual Communal Open Space is stated as **150m²** which equates to **8.33m²** per person.

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**. 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.

SPD2 Chapter 2 – Suburban Residential Development

SPD2 Para 2.29 requires Height of projection of neighbouring properties should be no greater than **45°** as measured from the Centre of the closest habitable room on the rear of the neighbouring property. We have used the adjacent rear elevations to estimate the **45° Rule** to the proposal and established that the projected **45°** line is not clear of the proposed structure and thus fails the Policy.



45° Degree Rule



Figure 2.11c: Height of projection beyond the rear of neighbouring properties is no greater than 45 degrees as measured from the middle of the window of the closest habitable room on the rear of the neighbouring property.

45° Degree Rule

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:

<https://www.croydon.gov.uk/sites/default/files/articles/downloads/New%20build%20guidance.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?

Para 4.2 of the Guidance states:

4.2 Internal Storage To enable and encourage occupants of new residential units to recycle their waste, developers should provide adequate internal storage, usually within the kitchen, for the separation of recyclable materials from other waste. It is recommended that developers consider methods to integrate the reusable sacks and 9ltr caddies for recycling into the design of the kitchen areas to enable and encourage residents to make full use of them.

MORA Comment:

There is no specified allocation of recycling storage for any kitchen of the 5 Units shown on the supplied plans.

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 as the total depth is only **1.666m** in total which includes the depth of the bins.



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 adjacent parking space.

The requirement of a water supply, with standard tap fittings, to be available to the bin storage area to enable washing down of the bins, walls and floor, 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:

Recent piecemeal redevelopments and infill developments in the MORA Post Code area has increased local residential population by **380**. To meet these increases in Residential Densities requires a proportionate increase in **PTAL** in the locality as defined in Policy para **11.205**.

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.

Location	Reference	Date of approval	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	15/03885/P	10/11/15	1	2	8	30	24	22	0.1236	64.75	242.82	2.93	194.25	9	0.3750	2
68-70 Orchard Ave	16/01838/P	07/09/16	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	16/04935/FUL	20/01/17	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	16/00274/P	04/08/16	1	5	7	24	22	17	0.0758	92.35	316.62	3.66	290.24	7	0.3182	2
98-100 Orchard Way	16/03808/P	27/02/17	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	15/04417/P	16/08/16	1	5	8	24	24	19	0.0646	123.88	371.63	4.22	371.63	9	0.3750	2
8-10 The Glade	17/00262/FUL	27/04/17	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	15/01507/P	10/07/15	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	17/03323/FUL	17/01/18	0	0	1	5	5	5	0.0601	16.64	83.19	0.66	83.19	2	0.4000	1a = 0.66
151 Wickham Road	17/06391/FUL	23/02/18	0	0	1	3	4	4	0.0200	50.00	150.00	3.00	200.00	0	0.0000	3
2-4 Woodmere Close	18/02746/FUL	09/08/18	0	2	1	6	5	3	0.0367	27.25	163.49	0.66	136.24	10	0.2000	1a = 0.66
6-8 Woodmere Close	18/03917/OUT	26/10/18	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	19/00051/FUL	27/02/19	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	18/02734/FUL	21/09/18	0	0	1	6	5	5	0.0764	13.09	78.53	2.00	65.45	1	0.2000	2
20-22 The Glade	18/05928/FUL	01/02/19	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	18/06070/FUL	21/03/19	1	0	9	32	41	41	0.2011	44.75	159.12	0.66	203.88	12	0.2927	1a = 0.66
32 Woodmere Avenue	19/00783/FUL		1	5	7	21	22	17	0.0600	116.67	350.00	6.00	366.67	5	0.2273	1a = 0.66
17 Orchard Avenue	19/00131/FUL		1	Not Known	9	15	18	Not Known	0.0710	126.76	211.27	2.00	253.52	4	0.2222	2
56 Woodmere Avenue	19/01352/FUL		1	Not Known	9	28	29	Not Known	0.0950	94.74	294.74	5.26	305.26	6	0.2069	1a = 0.66
Total			16	39	106	407	409	323	2.0254	1113.78	3980.12	44.46	4078.41	136	7.9496	
Average									0.1066	58.62	209.48	2.34	214.65	7.16	0.4184	

Recent in-fill and Redevelopments in the Post Codes of the MORA Area

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:

- 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;
- Ensure that the movement of pedestrians, cycles, public transport and emergency services is not impeded by the provision of car parking;**
- 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 380 persons resulting from in-fill and redevelopment and therefore the policy **Shirley Place Transport para 11.205 has NOT been fulfilled**

Summary

We therefore object to this proposed development on grounds of:

- a) The proposal does not fully meet London Plan Policy 3.5 minimum space standards for new dwellings and should therefore be refused as these deficiencies would be detrimental to the living conditions for occupants for the life of the development.
- b) From the foregoing D6, D2 & D1 Draft Policies we have assessed the increased Housing Density for this Post Code Area of ≈1.50ha (Google Earth) from existing 15.33u/ha to 20.67u/ha after this proposed development which is an unacceptable increase of 34.83% in Housing Density which at a location of high parking stress at PTAL 2 and forecast to remain at PTAL 2 until 2031 we consider is NOT an optimum use of land for this location.
- c) The proposal is non-compliant to Policy DM10.4 Private Amenity Space:
 - a. Unit 3 should also have 7m² Private Amenity Space but has only 5.5m² Private Amenity Space.
 - b. Unit 4 should also have 7m² Private Amenity Space but has only 5.5m² Private Amenity Space.
 - c. Unit 5 should have 7m² Private Amenity Space but has only 2.5m² Private Amenity Space.



- d. Thus, the proposal does not fully meet Policy DM10.4 c) in respect of Private Amenity Space and therefore should be refused as these deficiencies would be detrimental to the living conditions for occupants for the life of the development.
- d) As the location of this proposal is on a RED ROUTE parking restricted area, we believe that off-street parking availability is paramount and that the guidance in the London Plan Residential Parking Policy should be adopted to prevent any requirement for on-street parking. The proposed parking availability of 4 spaces and zero disabled bays is unacceptable at this location.
- e) The London Plan Policy 6.13 Table 6.2 Residential Parking Standards at Residential Density in the range 159 hr/ha to 250 hr/ha and Housing Density in the range 50 u/ha to 95 u/ha requires up to 1.5 car parking spaces per dwelling which equates to 7.5 spaces. However, there are only 4 car parking spaces provided and none are for disabled which is unacceptable in an area of high parking stress.
- f) SPD2 Para 2.29 requires Height of projection of neighbouring properties should be no greater than 45° as measured from the Centre of the closest habitable room on the rear of the neighbouring property. We have used the adjacent rear elevations to estimate the 45° Rule to the proposal and established that the projected 45° line is not clear of the proposed structure and thus fails the Policy SPD2 45° Rule.
- g) The Council Refuse & Recycling guidance included at:
- <https://www.croydon.gov.uk/sites/default/files/articles/downloads/New%20build%20guidance.pdf>
 - gives requirements for new developments at Section 4 - Flats with 5 or more units.
 - 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.
 - There is no specified allocation of recycling storage for any kitchen of the 5 Units shown on the supplied plans.
- h) 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.
- i) 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.
- j) The proposed development is an overdevelopment for the locality and does NOT respect the existing residential and housing densities. and is non-compliant to Policy: Shirley Place Homes para 11.200 & Character, Heritage and Design para 11.202.
- k) There has been “absolutely no improved access or transport links” in Shirley with proposed increases residential occupancy of 409 persons resulting from in-fill and



redevelopment and therefore the policy Shirley Place Transport **para 11.205** has NOT been fulfilled.

Please acknowledge receipt of this formal objection to this application to email address at: planning@mo-ra.co .

Please inform us of your recommended decision in due course.

Please register our comment as:

Monks Orchard Residents' Association (No Address) (Objects) on the comments tab of the LPA online public register.

Yours sincerely

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

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

Cc:

Mr Pete Smith	Head of Development Management (LPA)
Sarah Jones MP	Croydon Central
Steve O'Connell	GLA Member (Croydon & Sutton)
Cllr. Sue Bennett	Shirley North Ward Councillor
Cllr. Richard Chatterjee	Shirley North Ward Councillor
Cllr. Gareth Streeter	Shirley North Ward Councillor

Bcc:

MORA Executive
Committee
Local effected Residents