



To: Case Officer – Mr George Clarke
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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8th April 2019
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Reference:	19/01352/FUL
Application Received:	Wed 20 Mar 2019
Application Validated:	Wed 20 Mar 2019
Address:	56 Woodmere Avenue Croydon CR0 7PD
Proposal:	Demolition of a single-family dwelling and erection of a 3- storey block containing 2 x 3-bedroom, 6 x 2-bedroom and 1 x 1-bedroom apartments with associated access, 7 parking spaces, cycle storage and refuse store.
Consultation Close:	Thu 18th April
Target Date:	Wed 15 May 2019
Case Officer:	George Clarke

Dear Mr Clarke

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 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 planning policies** which are designed to **minimise over-development, meet acceptable accommodation standards and retain the local character within acceptable constraints**.

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).

SPD2 – Suburban Residential Developments

The proposed development has the following parameters:

56 Woodmere Ave - Application											
Site Area		950	sq.m.								
		0.095	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 Amenity (sq.m.)	Refuse & Recycling Bins (Ltrs)
Unit 1	Ground	2	1	2	1.3	1.5	54.00	50.00	40	5	130
Unit 2		4	3	4	0.8	2	74.00	74.00	80	7	150
Unit 3		3	2	3	0.57	2	61.00	61.00	130	6	140
Unit 4	1st	3	2	4	1.43	2	70.00	70.00	No Balcony	7	150
Unit 5		4	3	4	0.35	2.5	77.00	74.00	No Balcony	7	150
Unit 6		3	2	3	0.66	2	65.00	61.00	No Balcony	6	140
Unit 7	Roof Space	3	2	3	0.975	2	61.00	61.00	No Balcony	6	140
Unit 8		3	2	3	0.5	2	61.00	61.00	5	6	140
Unit 9		3	2	3	0.375	2	61.00	61.00	No Balcony	6	140
Totals		28	19	29			584.00	573.00			
Average		3.11									
Housing Density	94.74	u/ha	New London Plan Policy D6								
Residential Density	294.74	hr/ha	Post Code								
Bed Spaces/ha	305.26	bs/ha	Dwellings in Post Code Area								
PTAL (Base Year)	1a		Post Code Area								
PTAL Forecast 2031	1a		Housing Density for Post Code								
Car Parking	7		Demolished Dwellings								
Parking/person	0.24	sp/bs. Sp.	New Dwellings								
Disabled Parking	1	Inclusive	New Dwellings in Post Code								
Communal Open Space	?	sq.m.	New Housing Density for area								
Open Space/ person	?	sq.m.	Percentage Increase in Density								

Analysis of proposal against current Adopted Planning Policies

The type face with green background are **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 **28/0.095 = 294.74 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 294.74 hr/ha** which is appropriate for Residential Densities in the range **200 hr/ha to 350hr/ha** which requires a **PTAL in the range of 4 to 6**.

Assuming the incremental **PTAL** and **Residential Densities** over the ranges recommended are approximately linear, then the **PTAL** at **Residential Density of 294.74 hr/ha** should 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, $294.74 = \left(\frac{\Delta y}{\Delta x}\right)x - 100 = \left(\frac{350-200}{6-4}\right)x - 100$; which gives: $\frac{350+100}{75} = x = 5.263 = \text{PTAL}$

In addition, the **Housing Density** of the proposed development is **9/0.095 u/ha = 94.74 u/ha**. The **PTAL** for the locality is **1a** (i.e. Numerically ≈ 0.66). The Housing Density range recommended for a Suburban Setting at **PTAL 1a** is between **40 u/ha to 65 u/ha**. However, the proposed development has **Housing Density of 94.74 u/ha** which is appropriate for Housing Densities in the range **55 u/ha to 115 u/ha** which requires a **PTAL in the range of 4 to 6**.

Again, assuming the incremental **PTAL** and **Housing Densities** over the ranges recommended are approximately linear, then the **PTAL** at **Housing Density of 94.74u/ha** should follow the straight-line graph of: $y = mx + c$ $y=mx+c$

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

Then, $94.74 = \left(\frac{\Delta y}{\Delta x}\right)x - 30 = \left(\frac{115-55}{6-4}\right)x - 30$; which gives: $\frac{94.74+65}{30} = x = 5.325 = \text{PTAL}$

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 = 0.66)	2 to 3	4 to 6 (RD 5.26) (HD 5.33)
Suburban	150–200 hr/ha	150–250 hr/ha	200–350 hr/ha (294.74 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 (3.11 hr/unit)	40–65 u/ha	40–80 u/ha	55–115 u/ha (94.74 u/ha)
2.7–3.0 hr/unit	50–75 u/ha	50–95 u/ha	70–130 u/ha

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



MORA Comment:

This **over development** can be shown at the Table above which is an extract from the **London Plan Density Matrix Table 3.2** at a **suburban setting** to illustrate that the **Residential and Housing Density** of the proposed development is **totally inappropriate without justification** and that the **proposal is an over-development for the local public transport infrastructure**, as this locality is **NOT** within a designated focussed intensification area.

A **Residential Density** of **294.74 hr/ha** is totally inappropriate for the locality which has a **PTAL** of **1a** (≈ 0.66) when it **actually requires a PTAL of 5.263** in the ranges **4 to 6** shown on **Table 3.2**. The appropriate ranges for **Residential Densities** at this setting and **PTAL 1a** with an average of **3.11 hr/u** are shown in **Blue Text**.

Similarly, a **Housing Density** of **94.74 u/ha** is totally inappropriate for a locality of **PTAL 1a** but would actually require a **PTAL of 5.33** in the highest range **4 to 6**, but the locality has a **PTAL** 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 **3.11 hr/u** are shown in **Blue 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**.

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 **object to this proposed development** on grounds of over-development at this location and that the **Residential Density** of **294.74hr/ha** is **totally inappropriate at PTAL 1a** and is more appropriate at a suburban setting with **PTAL of 5.26** (in the maximum public transport range possible) and also that the **Housing Density** at **94.74 u/ha** in the highest PTAL range possible, is **inappropriate** at a suburban setting with **PTAL at 1a** and is more appropriate at a locality of **PTAL of 5.263** (in the maximum public transport range possible).

We 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 aware 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 officer's 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**.

Draft London Plan Policy D6, D2 & D1

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 optimal density by Policy D6 requires built form and massing measures which 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 area). 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 **≈0.80ha (Google Earth)** from **13** existing dwellings at **16.25 u/ha** to **21** new dwellings at **26.25 u/ha** after this proposed development, which is an unacceptable increase of **61.54%** in **Housing Density** at a location of parking stress at **PTAL 1a** and forecast to remain at **PTAL 1a** until **2031**. **We consider this increase in Housing Density without justification is NOT an optimum use of land for this location.**

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**.

Unit 1 has 1 Bedroom with 2 Bed Spaces which require 1.5m² Storage but has only ≈1.3m² Storage Space.

Unit 2 has 3 Bedrooms with 4 Bed Spaces which requires 2.5m² Storage but has only ≈0.8m² Storage Space.

Unit 3 has 2 Bedrooms with 3 Bed Spaces which requires 2m² Storage but has only ≈0.57m² Storage Space.

Unit 4 has 2 Bedrooms with 4 Bed Spaces which requires 2m² Storage but has only ≈1.43m² Storage Space.

Also, Unit 4 has the door to the Bathroom which **fails** the **cupboard/bathroom wall** and would be **impossible** to open to allow access to the bathroom; the dividing wall is also built across the hand basin (**See illustration right**).

Unit 5 has 2 Bedrooms with 3 Bed Spaces which requires 2m² Storage but has only ≈0.35m² Storage Space.

Unit 6 has 2 Bedrooms with 4 Bed Spaces which requires 2m² Storage but has only ≈0.66m² Storage Space.

Unit 7 has 2 Bedrooms with 4 Bed Spaces which requires 2m² Storage but has only ≈0.975m² Storage Space.

Unit 8 has 2 Bedrooms with 4 Bed Spaces which requires 2m² Storage but has only ≈0.5m² Storage Space.

Unit 9 has 2 Bedrooms with 4 Bed Spaces which requires 2m² Storage but has only ≈0.375m² Storage Space.

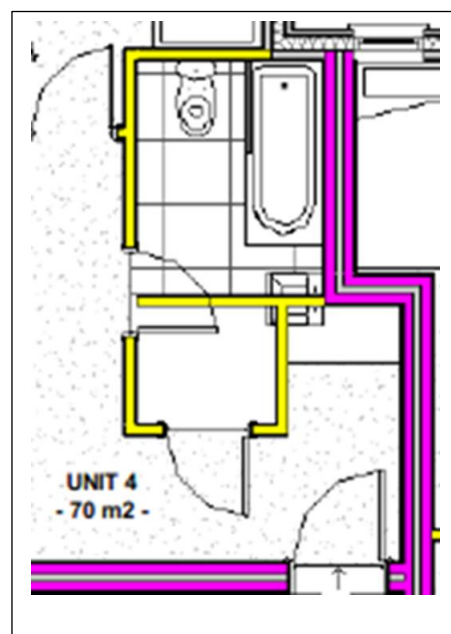


Table 3.3 Minimum Space Standards for New Dwellings					
Number of bedrooms	Number of bed spaces	Minimum GIA (m ²)			Built-in storage (m ²)
		1 storey dwellings	2 storey dwellings	3 storey dwellings	
1b	1p	39 (37)*			1
	2p	50	58		1.5
2b	3p	61	70		2
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	

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



The proposed development has **insufficient Storage Space for every Unit** which is in contravention of the **London Plan Policy 3.5 Minimum Space Standards** for new dwellings which would be **detrimental for the future occupants for the life of the development and this proposed development should be refused.**

In addition, **Units 4, 5, 6, 7 and 9 have no allocated Private Amenity Space and Unit 9 has 5m² Private Amenity Space** but should have **6m² Private Amenity Space**; **Unit 8** is deficient in amenity space by **1m²** for the number of occupants in accordance with the London Plan minimum Space Standards. **This is detrimental for future occupants of the proposed development for the life of the development and is unacceptable and should therefore be refused.**

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 **7 spaces** for **29 occupants** giving a parking allocation of **0.24 spaces per occupant** at a locality of **PTAL 1a**. Any Overspill car parking would be either in **Round Grove** which is an unclassified adopted road of **347 metres** or in **Woodmere Avenue** between two nasty bends.

It is understood that the Croydon Planners take the view that elderly, frail and disabled residents should buy a bike or use their walking frames and dispense with their cars and that younger individuals should relent on their enjoyment of social travel with friends and family and also dispense with their cars; but in reality, there is no legislation to prevent car or vehicle ownership (YET!). This may indeed come with a future government of a different political persuasion.

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	
Suburban	150–200 hr/ha	Parking provision	150–250 hr/ha	Parking provision	200–350 hr/ha	Parking provision
3.8–4.6 hr/unit	35–55 u/ha	Up to 2 spaces per unit	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	Up to 1.5 spaces per unit	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		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	Up to 1.5 spaces per unit	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 Table 6.2 – Residential Parking Standards

With this in mind the London Plan on residential parking provision currently requires at **PTAL 1a** in suburban settings in Outer London Boroughs to have up to 2 parking spaces per dwelling and the emerging Draft new London Plan **Table 10.3** requires outer London boroughs at **PTALs 0-1** to have **1.5 spaces per dwelling** – this would equate to a requirement for **13.5** car parking spaces for this proposal. Rather more civilised than the Croydon Local Plan policy on residential parking.

In addition, the Draft London Plan requires that to ensure genuine housing choice, disabled persons' parking should be provided for new residential developments and should ensure that 1 in 5 spaces (both active and passive) provide an electrical charging point to encourage the uptake of electric vehicles. Only 1 disabled parking space is provided and there are two specified electric charging points provided.

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 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.

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	2.0000	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 Local redevelopments and infill developments in the MORA Area

(The RED Text indicates recent development that exceeds the London Plan Guidance on Densities and PTAL for the locality).

The additional cumulative local developments in addition to current proposals is forecast to be an additional **409 residents** which 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:

- The development pattern, layout and siting;
- The scale, height, massing, and density;**
- 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, MASSING, or 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:

- a) be prepared with the objective of contributing to the achievement of **sustainable development**¹⁰;
- 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;
- e) be accessible through the use of digital tools to assist public involvement and policy presentation; and
- f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).

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**.

Achieving appropriate densities

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

- a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
- b) local market conditions and viability;
- 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
- e) the importance of securing well-designed, attractive and healthy places.

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 fronting Round Grove of the proposed development which is **contrary to Policy DM10.2** although screened by shrubs. It is not stated the variety of shrub or height of a matured specimens to afford adequate screening to meet the policy requirement.

It is noted that the elevations show a **chimney** on the **front elevation** but all floor plans and the roof plan do not show any fireplaces or chimney breasts to support the chimney so we believe that this is another error in the elevation drawings.

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

- Is of high-quality design, and enhances and respects the local character;
- Provides functional space (the minimum width and depth of balconies should be 1.5m);
- 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:

In addition, **Units 4, 5, 6, 7 and 9 have no allocated Private Amenity Space and Unit 9 has 5m² Private Amenity Space but should have 6m² Private Amenity Space; Unit 8 is deficient by 1m² for the number of occupants in accordance with Policy DM10.4 minimum Space Standards. This is detrimental for future occupants of the proposed development for the life of the development and is unacceptable and should therefore be refused.**

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 per resident allocated to “communal outdoor amenity space” in that the amount of space per occupant for any proposed development is NOT specified.

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 compliant to **NPPF para 16** which states:

16. Plans should:

- be prepared with the objective of contributing to the achievement of sustainable development¹⁰;
- be prepared positively, in a way that is aspirational but deliverable;
- be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisation's, businesses, infrastructure providers and operators and statutory consultees;
- contain policies that are **clearly written and unambiguous, so it is evident how a decision maker should react to development proposals**;
- be accessible through the use of digital tools to assist public involvement and policy presentation; and
- serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).

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;

- The amenity of the occupiers of adjoining buildings are **protected**; and that
- They do not result in **direct overlooking** at close range or habitable rooms in main rear or private elevations; and that
- 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
- Provide adequate **sunlight and daylight to potential future occupants**; and that
- They do not result in significant loss of existing sunlight or daylight levels of adjoining occupiers.

MORA Comment:

The Supplementary Planning Document SPD2, (adopted 1st April 2019) **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. The owner of **54 Woodmere Avenue** has provided the measurements for the Centre



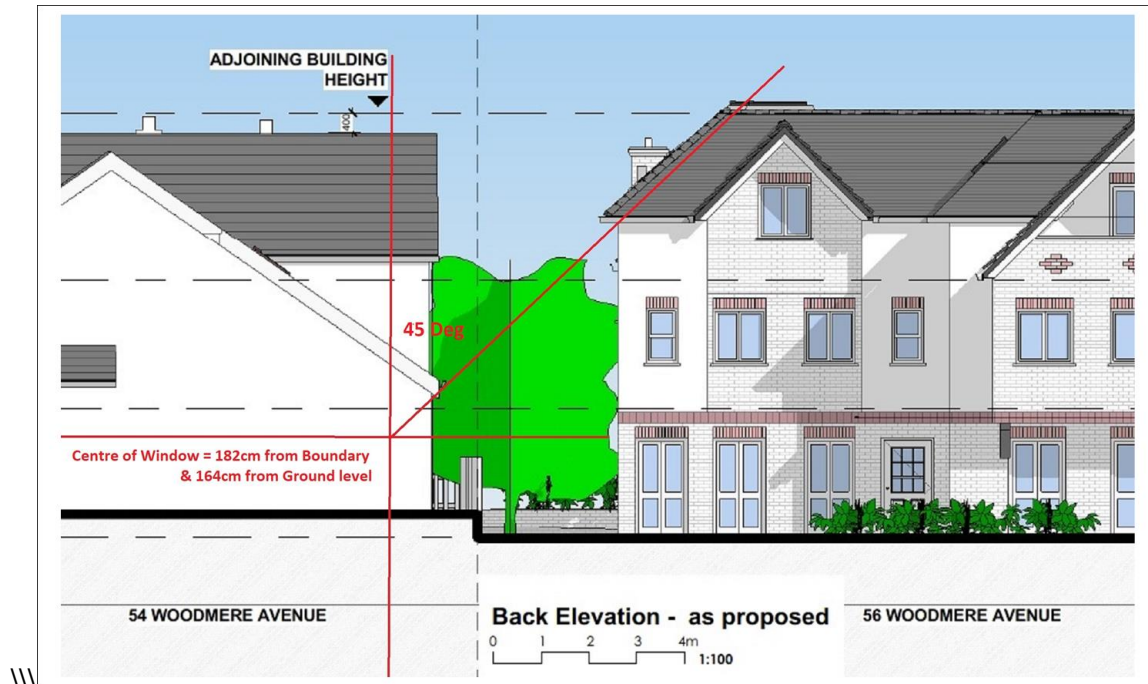
Rear aspect of 54 Woodmere Avenue

of the ground floor window at **182cm** from the boundary and **164cm** from ground level.

This illustrates that the proposed development **fails to meet the 45° rule on height (see below) and will intercept the 45° projection** in relation to the **adjacent property**. It should be recognised that the proposed development is to be **sunk into a 0.6m hole in the ground** in order to meet the adjacent properties height restriction. **If the built form is NOT actually sunk into the ground**, the built form would be **0.6m higher** and the projected **45° Rule** would show much more of the proposed development would be **above the 45° intercept projection** and significantly greater

non-compliance to the policy. **The built height is therefore extremely critical.**

These projections are based upon the provided plans with dimensions scaled off when magnified at 112% which gives 1cm = 1m. This illustrates an overbearing nature of the proposed development on the adjacent property at **54 Woodmere Avenue**.



Illustrations of the 45° Rule regarding the adjacent property

It should be noted that the statement at **page 8** of the Applicant's "**External Daylight Study**" indicates the two upstairs flank wall windows of **54 Woodmere Avenue** are "**obscure glazed bathrooms**" and are identified on P8 of the external daylight study as being "**non-habitual windows serving bathrooms.**" **These are in fact bedrooms. The glazing to both is clear.** The bathrooms are in fact served by windows 2 and 3. Again the **glazing is clear** as they have not been overlooked in the past. There is a further window at a right-angles to window 2 which, although facing north, is also part of a **bedroom** and which is considered to be integral to the western elevation of **54 Woodmere Avenue**. **These errors in the "External Daylight Study" mean the daylight study conclusions cannot reasonably be relied upon** in supporting this planning application proposal.

It should be noted that the existing property at 54 Woodmere Avenue was built approx. 1926 and has very small windows which limits the internal natural light. This proposed development will significantly decrease natural light and reduce the internal light levels for 54 Woodmere Avenue to unacceptable and unreasonable levels and could result in a legal challenge.

Policy DM13: Refuse and Recycling

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

- a. **Sensitively integrate refuse and recycling facilities** within the **building envelope**, or, in conversions, where that is not possible, integrate within the landscape covered facilities that are **located**

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behind the building line where they will not be **visually intrusive** or compromise the provision of shared amenity space;

b. Ensure facilities are **visually screened**;

c. Provide **adequate space for the temporary storage of waste** (including **bulky waste**) materials generated by the development; and

d. Provide layouts that ensure facilities are safe, **conveniently located and easily accessible by occupants, operatives and their vehicles.**

MORA Comment:

The Council Refuse & Recycling guidance included at:

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

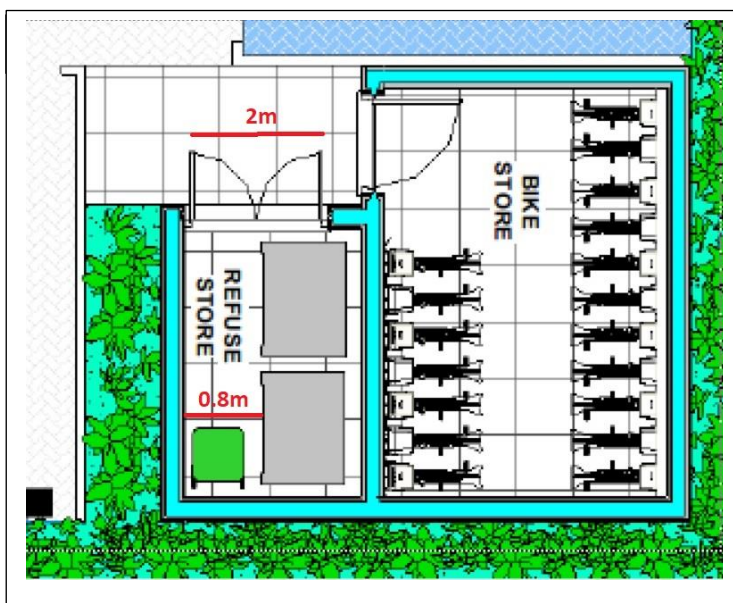
Gives requirements for new developments at **Section 4 - Flats with 5 or more units.**

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**, as is the case for this proposed development, 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 adjacent Bike store.**



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** fully 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 Recent Local redevelopments and infill developments in the MORA Post Code Area), has increased local residential population by **409**. 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 infrequent and heavily congested at peak times and the increase in Residential Densities resultant from cumulative piecemeal developments and 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 but suffers frequent cancellations.

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

Policy DM30: Car and cycle parking in new development

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

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



MORA Comment:

The 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 **409** 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, 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 for the lifetime of the development.** We therefore **object** to this proposed development on grounds of over-development and non-compliance 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 any Justification. The current **adopted London Plan Policy** indicates that developments which **compromise this policy** should be refused.

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**

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Policy 3.5 as defined at **Table 3.3** with respect to no **Private Amenity Space** for **Unit 4, 5, 6, 7 and 9**. Also, the proposal has **inadequate** provision of **storage space** for **all of the Units** 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**. As such, the **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 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 recently adopted **Supplementary Planning Document SPD2, Chapter 2 Suburban Residential Developments at Para 2.11 Heights & Depths Projecting beyond Building Lines** at pages **36 & 37** and as such is a high mass development which is overbearing to the adjacent property at **54 Woodmere Avenue**. The proposed development is to be **sunk into a 0.6m hole in the ground** in order to meet the adjacent properties height restriction. If the built form is **NOT** actually sunk into the ground, the built form would be **0.6m higher** and the projected **45° Rule** would show much more of the proposed development and would be above the **45° projection** and significantly greater non-compliance to the policy. **The built height is therefore extremely critical.**

As a result of massing and closeness to no 54 Woodmere Avenue, there would be significant loss of natural light to residents of 54 Woodmere Avenue.

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**.



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 **409 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