

To: Ms Louise Tucker - Case Officer  
Development Environment  
Development Management  
6th Floor  
Bernard Weatherill House  
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Croydon  
CR0 1EA

From:  
Monks Orchard Residents' Association  
Planning

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24 April 2019  
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<b>Reference:</b>	<b>19/01134/FUL</b>
<b>Application Received:</b>	<b>Mon 11 Mar 2019</b>
<b>Application Validated:</b>	<b>Tue 16 Apr 2019</b>
<b>Address:</b>	<b>The Sandrock 152 Upper Shirley Road Croydon CR0 5HA</b>
<b>Proposal:</b>	<b>Erection of two storey side/rear extension to The Sandrock Public House and use of first floor as 1 x two bedroom flat for staff accommodation. Erection of a three/four storey building to rear of pub comprising 19 flats (7 x one bedroom, 6 x two bedroom and 6 x three-bedroom flats) with associated car parking, cycle and refuse storage and landscaping.</b>
<b>Case Officer:</b>	<b>Ms Louise Tucker</b>
<b>Consultation Close:</b>	<b>Fri 10 May 2019</b>
<b>Target Decision:</b>	<b>Tue 16 Jul 2019</b>

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Dear Ms Tucker

The Monks Orchard Residents' Association (MORA) is a registered Residents' Association with the London Borough of Croydon LPA. We represent 3,879 residential households in the Shirley North Ward. We have an affinity with the "Sandrock" Pub as although it is in the Shirley South Ward, it is used to serve our community when our residents take walks and exercise over the Shirley Hills public open space.

Please accept this formal objection to the above quoted planning application on the following grounds:

Note: Text with green background are adopted or emerging planning policies.

**General Observations:**

The Roof form and façade of the proposed development does not relate to roof forms or the defining character of properties and buildings in the locality and therefore does not reflect the character of the surrounding "place" locality. The actual proposed block of flats is totally out of character with all surrounding properties and the character of the locality and would be an ugly addition to a current delightful enclave of local historical interest and recent developments of attractive dwellings in Sandpits Road, Sandrock Place & Birkdale Gardens.

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**Ground Floor Plan and Site Layout**



**Proposed Front Elevation from Sandrock Place showing four floors and massing (significantly greater than the host property <sup>[1]</sup> – The Sandrock Pub)**

## Current London Plan Policies

### Housing supply

Policy 3.4 Optimising housing potential

Housing Supplementary Planning Guidance

Policy 3.5 Quality and design of housing developments

Policy 3.6 Children and young people's play and informal recreation facilities

Policy 6.13 Parking

## Emerging London Plan Policies

### Design

Policy D1 London's form and characteristics

**[1]** NOT Subservient to the host property !

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**Policy D2 Delivering good design**

**Policy D6 Optimising density**

**Policy D7 Public realm**

**Heritage and Culture**

**Policy HC7 Protecting public houses**

**Transport**

**Policy T6 Car parking**

## Current Croydon Local Plan Policies

**Large residential development (ten or more new homes)**

**Policy SP2: Homes**

**Policy DM1: Housing choice for sustainable communities**

**Policy DM10: Design and character**

**Policy DM13: Refuse and recycling**

**Policy DM23: Development and construction**

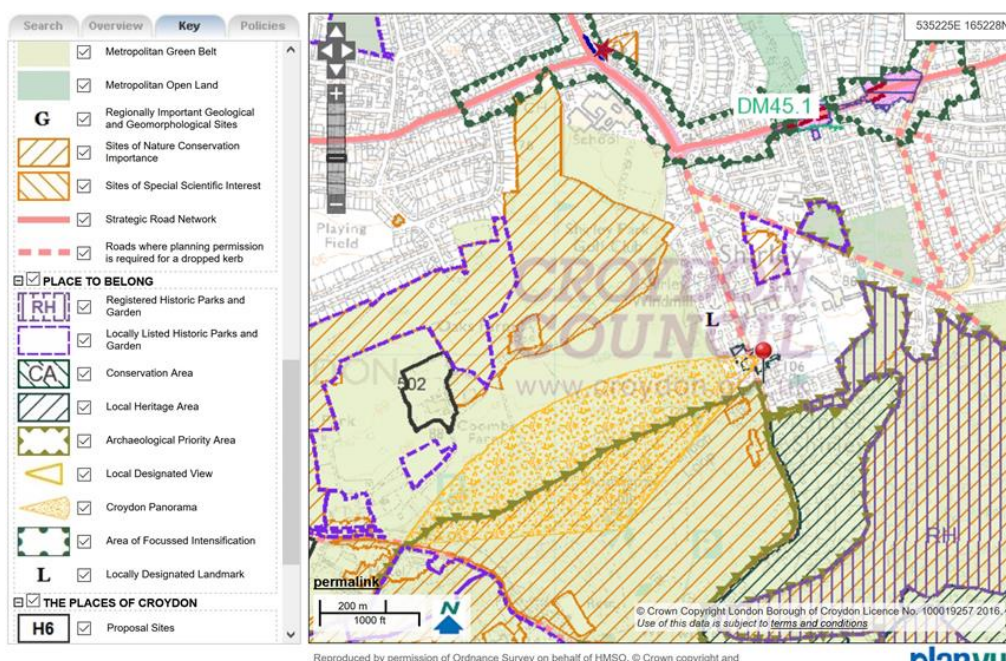
**Policy DM30: Car and cycle parking in new development**

**Shirley Place**

**Change of use of a public house**

**Policy DM21: Protecting Public Houses**

The Location is close to areas of Nature Conservation, local Heritage, Registered Historic Parks and Gardens as shown by the Policies Map below, and generally a pleasant residential area considered by local residents. The introduction of a high-density development in such a locality would completely destroy this iconic locality.



**Croydon Plan Policies Map for Post Code CR0 5HA**

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## Sandrock Public House - App. Ref:19/ 01134/FUL:

Proposal Parameters:													
Site Area		2319	sq.m.			0.2319	ha						
	Units	Habitable Rooms	Simplex Duplex	Bedr's	Persons	GIA	GIA Table 3.3	Storage offered	Storage Table 3.3	Private Amenity Space Requirements			
Ground Floor:						sq.m.	sq.m.	sq.m.	sq.m.	Terrace	Balcony	Total	Required
Block A													
G 01 Pub		2											
Block B													
G 01	1	4	Duplex	3	5	106.1	93	0.9	2.5	18	4.9	22.9	8
G-02	1	2	Simplex	1	2	50.3	50	1.5	1.5	Nil	5.9	5.9	5
G 03	1	2	Simplex	1	2	51.3	50	1.5	1.5	Nil	6.3	6.3	5
G 04	1	2	Simplex	1	2	51.7	50	1.8	1.5	Nil	6.0	6	5
G 05	1	4	Simplex	3	4	75.0	74	1.3	2.0	Nil	8.9	8.9	7
G 06	1	4	Simplex	3	4	77.0	74	1.4	2.0	Nil	10.6	10.6	7
First Floor:													
Block A													
1 01	1	3	Simplex	2	4	75.4	70	2.6	2.0	9.8	3.4	13.2	7
1 02	1	3	Simplex	2	4	70.6	70	2.6	2.0	Nil	Nil	Nil	7
1 03	1	3	Simplex	2	4	76.4	70	1.9	2.0	Nil	Nil	Nil	7
Block B													
1 01	1	3	Simplex	2	4	75.4	70	2.6	2.0	9.8	3.4	13.2	7
1 02	1	2	Simplex	1	2	51.7	50	2.8	1.5	5.7	3.4	9.1	5
1 03	1	3	Simplex	2	4	74.9	70	1.4	2.0	Nil	18.8	18.8	7
1 04	1	3	Simplex	2	4	76.3	70	0.9	2.0	11.8	4.9	16.7	7
Second Floor:													
Block A													
2 01	1	2	Simplex	1	2	58.8	50	1.1	1.5	Nil	Nil	Nil	5
Block B													
2 01	1	4	Simplex	3	4	91.8	74	2.0	2.0	12.4	4.9	17.3	7
2 02	1	3	Simplex	2	4	71.7	70	2.4	2.0	5.2	3.4	8.6	7
2 03	1	4	Duplex	3	5	100.6	93	1.7	2.5	28.8	Nil	28.8	8
2 04	1	3	Simplex	1	2	50.6	50	2.6	1.5	13.2	Nil	13.2	5
Third Floor:													
Block B													
3 01	1	4	Simplex	3	4	91.8	74	2.5	2.0	Nil	20.0	20	7
3 02	1	3	Simplex	2	4	76.2	70	3.0	2.0	10.9	3.7	14.6	7
Total	20	63	0	40	70	1453.6	1342	38.5	38	125.6	108.5	234.1	130

Housing Density	86.24	u/ha		
Residential Density	271.67	hr/ha		
Residential Density	301.85	bs/ha		
London Plan Policy 6.13				
New London Plan Table 10.3	up to	1/flat	20	
Disabled Bays	1	Bays		
Disabled Bays - Wide	1			
Electric Charging Points	Zero	Bays		
Car Parking Block A	2			
Car parking Block B	8			
Car Parking/person	0.1143	#/bed spaces		
Average hr/unit	3.15	hr/u		
Occupants	70			
PTAL 2011	2	3.15 u/ha	Required PTAL	Res Den 271.67 =4.822
PTAL 2031	2			Hsg Den 86.24 =5.041
Communal Open Space	Zero		Unsuitable terrain	
Play Space for Children	Zero		Play Space for Children offered	
Requirement DM10.4 d)	10 dwellings and above		10 sq.m.	Per child

London Plan Policy D6:			
Post Code		CRO 5HA	
Dwellings		37	Units
Area		3.73	ha
Existing Housing Density		9.92	u/ha
New Dwellings		20	Units
Loss of Dwelling		1	Units
Total New Dwellings		56	Units
New Housing Density		15.01	u/ha
Increased Housing Density		51.31	%
Development Parameters:			
Bedrooms per hectare		172.49	br/ha
Bed Spaces per Hectare		301.85	bs/ha

New London Plan Policy T6.1 Residential parking													
C All residential car parking spaces must provide infrastructure for electric or Ultra-Low Emission vehicles. At least 20 per cent of spaces should have active charging facilities, with passive provision for all remaining spaces.													
G Disabled persons parking should be provided for new residential developments. Residential development proposals delivering ten or more units must, as a minimum:													
1) ensure that for three per cent of dwellings, ensure that at least one designated disabled persons parking bay per dwelling for three per cent of dwellings is available from the outset													
2) demonstrate on plan and as part of the Parking Design and Management Plan, how an additional seven per cent of dwellings could be provided with a designated disabled persons parking space in future upon request. This should be provided as soon as existing provision is shown to be insufficient.													

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## Current London Plan Policies

### Policy 3.4 Optimising housing potential

**A** Taking into account local context and character, the design principles in Chapter 7 and public transport capacity, development should optimise housing output for different types of location within the relevant density range shown in **Table 3.2**. Development proposals which compromise this policy should be resisted.

The **Housing Density** for this proposal is 20/0.2319 units/hectare = **86.244 u/ha** and **Residential Density** is 63/0.2319 habitable rooms per hectare = **271.669 hr/ha**.

The **Residential Density** at **PTAL 2** in a **suburban setting** should be at the lower end of the range **150 to 250hr/ha** but the **Residential Density** is actually **271.669 hr/ha** which is in the range **200 to 350hr/ha**.

Assuming the incremental **PTAL** and **Residential Densities** over the ranges recommended in **Table 3.2** are approximately linear, then the **PTAL** at **Residential Density** of **271.669hr/ha** should follow the straight-line graph of:  $y = mx + c$

where  $m = \left(\frac{\Delta y}{\Delta x}\right)$  = slope,  $y$  = Residential Density,  $x$  = PTAL and  $c$  =  $y$  intercept when  $x = 0$

$$271.669 = \left(\frac{\Delta y}{\Delta x}\right)x - 100 = \left(\frac{350 - 200}{6 - 4}\right)x - 100; \text{ gives: } \frac{271.669 + 100}{75} = x = 4.9557 = \text{PTAL}$$

Also, the **Housing Density** of the proposed development is 20/0.2319 u/ha = **86.244 u/ha**. The **PTAL** for the locality is **2**. So, the Housing Density range recommended for a Suburban Setting at **PTAL 2** at average habitable rooms per Unit of **3.15hr/unit** should be toward to lower end of the range **40 to 80u/ha**. However, the Housing Density is actually **86.244u/ha** which is in the range **55 to 115u/ha** and at a **PTAL** of between **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 **86.244u/ha** should follow the straight-line graph of:  $y = mx + c$

where  $m = \left(\frac{\Delta y}{\Delta x}\right)$  = slope,  $y$  = Housing Density,  $x$  = PTAL and  $c$  =  $y$  intercept when  $x = 0$ .

$$86.244 = \left(\frac{\Delta y}{\Delta x}\right)x - 65 = \left(\frac{115 - 55}{6 - 4}\right)x - 30; \text{ gives: } \frac{86.244 + 65}{30} = x = 5.041 = \text{PTAL}$$

Therefore, both Residential Density and Housing Density are appropriate for a suburban setting with a PTAL of **≈5** NOT 2 which demonstrates a significant over development for this locality.

The Residential Density should approximate to 150hr/ha and the Housing Density approximate to 40 units/ha (At the lower values of the broad ranges).

Table 3.2 Sustainable residential quality (SRQ) density matrix (habitable rooms and dwellings per hectare)			
Setting	Public Transport Accessibility Level (PTAL)	Public Transport Accessibility Level (PTAL)	Public Transport Accessibility Level (PTAL)
	0 to 1	(2) to 3	4 to 6 Res Den 4.956 [5.263] Hsg Den 5.041 [5.175]
Suburban	150–200 hr/ha	150–250 hr/ha	200–350 hr/ha (271.67 hr/ha) (294.737hr/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 (3.15 hr/ha)	40–65 u/ha	40–80 u/ha	55–115 u/ha (86.24 u/ha)
2.7–3.0 hr/unit (2.8 hr/ha)	50–75 u/ha	50–95 u/ha	70–130 u/ha (105.263u/ha)

**Table 3.2 Density Matrix - appropriate Densities in BLUE and Proposal Calculated Densities in RED, and Applicants Densities in GREEN.**

The Applicant's Design and Access Statement at Section 11.6 Density states:

### 11.6 Density

*"Table 3.2 of the London Plan gives for a site in a suburban setting, with an average dwelling size of 2.7 – 3.0 habitable rooms per unit and within a PTAL 2, a suggested density of between 50-59 u/ha and 150 to hr/ha.*

*As the proposal is for a mixed-use scheme (pub plus residential) we have applied the Housing SPG methodology for calculating density in this case. 19% of the proposed will be public house use, 81% residential. The site is 0.23ha. Therefore, the site area for residential density calculation is 81% of 0.23 which is 0.19 ha.*

*This scheme proposes a residential development providing 20 flats or 56 habitable rooms on a site area of 0.19ha. This equates to a residential density of 10-5u/ha or 294hr/ha!*

Based upon the applicant's calculations at average habitable rooms per unit between 2.7 and 3hr/unit, (it is actually 2.8hr/ha) the Housing Density at 105.263u/ha is in the range 70 to 130 u/ha and a Residential Density at 56hr at 0.19ha = 294.737hr/ha which is in the highest range of 200 to 350hr/ha. Again, using the formula:  $y = mx + c$

where  $m = \left(\frac{\Delta y}{\Delta x}\right)$  = slope, y = Residential Density, x = PTAL and c = y intercept when x = 0.

The Residential Density at 294.737 hr/ha requires a PTAL of:

$$\text{Residential Density} = 294.737 = \left(\frac{350-200}{6-4}\right)x - 100 = \frac{294.737+100}{75} = x = 5.263 = \text{PTAL} \ \&$$

where  $m = \left(\frac{\Delta y}{\Delta x}\right)$  = slope, y = Housing Density, x = PTAL and c = y intercept when x = 0.

and the Housing Density at 105.263 u/ha requires a PTAL of:

$$\text{Housing Density} = 105.263 = \left(\frac{130-70}{6-4}\right)x - 50 = \frac{105.263+50}{30} = 5.175 = \text{PTAL}$$

Therefore, using the applicant's own figures above, the **Residential Density** and **Housing Density** require a **PTAL of >5** when the locality has a **PTAL** of just **2** which is conclusive proof of **over-development** of the site at this location both in **Housing and Residential Density**.

More general guidance on implementation of Policy [3.4](#) is provided in the **Housing SPG** including exceptional circumstances where densities above the relevant density range may be justified.

## Housing Supplementary Planning Guidance (SPG)

1.1.17 In robustly justified **exceptional circumstances** boroughs may identify particular locations where densities above the ranges in the SRQ matrix may be appropriate, taking into account local context, infrastructure capacity, viability and with further guidance in section 1.3.

1.3.22 Linking the level of density to the **accessibility of public transport** (and, in light of local circumstances, its frequency and capacity) **is a central consideration in making the best use of a site**, helping to realise the proper potential of those within walking distance of public transport and town centres whilst allowing lower densities where public transport accessibility and capacity is less.

1.3.23 ... Low PTAL scores do not by themselves preclude development, but **will limit the densities which will be appropriate on such sites**, unless a significant change in public transport connectivity levels can be achieved to justify the use of a higher density range without undermining the achievement of sustainable development. In assessing a site's capacity, a site-specific PTAL assessment should be carried out.

**The PTAL forecast for this site is to remain at PTAL 2 until 2031.**

### Developments above the density ranges

1.3.50 the London Plan and this SPG confirm that it is not appropriate to apply table 3.2 mechanistically and advise that the density ranges should be considered as a starting point rather than an absolute rule when determining the optimum housing potential of a particular site<sup>102</sup>. as confirmed in section 1.1, meeting London's housing requirements will necessitate residential densities to be optimised in appropriate locations with **good public transport access**. Consequently, the London Plan recognises the particular scope for higher density residential and mixed-use development in town centres, opportunity areas and intensification areas, surplus industrial land and other large sites<sup>103</sup>. In addition, the Plan confirms that the housing SPG will provide general and geographically specific guidance on the justified, **exceptional circumstances** where the density ranges may be exceeded<sup>104</sup>.

Using the **Applicant's** figures, the **Residential Density** of the proposal at **294.737hr/ha** is a **96.491%** increase from that recommended at **≈150hr/ha** and the **Housing Density** at **105.263u/ha** is a **163.157%** increase from that recommended at **≈40u/ha** for this location at PTAL 2, which is **NOT justifiable**. This Site is NOT in an Intensification Area, is NOT in a Town Centre, is NOT in an Opportunity Area or any other designated category defined in SPG para 1.3.50 allowing increased densities and therefore **has no justification for such a high increased Density outside the broad ranges of Table 3.2 for PTAL of 2.**

The applicant has **NOT** given any justification for any other reason for increased **Housing or Residential Density** at this location of **PTAL 2** and therefore the proposed **Densities significantly compromise the current London Plan Policy 3.4 on Optimising Housing Potential and should therefore be refused.**

**Note:** As a result of our **Stage 1 Complaint Ref: CASE4893951 [now escalated to Local Government Ombudsman (LGO) at Case ID – 19000971]**, 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 (See representations to the Hearing M39 – Density<sup>[2]</sup>).

Nevertheless, the emerging Policy at **Policy D6 Optimising 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 emerging 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**.

### 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.

**Table 3.3 provides Minimum Space Standards for new Dwellings.**

Block B Unit G 01 at 3 beds and 5 persons require 2.5m<sup>2</sup> Storage but the proposals only provide 0.9m<sup>2</sup> Storage.

Block B Unit G 05 at 3 bed and 4 persons requires 2m<sup>2</sup> Storage but the proposal only provides 1.3m<sup>2</sup> Storage space.

Block B Unit G 06 at 3 Bed and 4 persons requires 2m<sup>2</sup> Storage but the proposal only provides 1.4m<sup>2</sup> Storage.

Block A Unit 1 03 at 2 Bed 4 persons requires 2m<sup>2</sup> Storage but the proposal only provides 1.9m<sup>2</sup> Storage.

Block B Unit 1 03 at 2 Bed 4 person requires 2m<sup>2</sup> Storage but the proposal only provides 1.4m<sup>2</sup> Storage.

**[2] All Representations for the London Plan EiP Hearing M39 at:**

<https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/examination-public-draft-new-london-plan/written-statements/density-m39#acc-i-55715>



Block B Unit 1 04 at 2 Bed 4 persons requires 2m<sup>2</sup> Storage but the proposal only provides 0.9m<sup>2</sup> Storage.

Block A Unit 2 01 at 1 Bed 2 persons requires 1.5m<sup>2</sup> Storage but the proposal only provides 1.1m<sup>2</sup> Storage.

Block B Unit 2 03 at 3 bed 5 persons requires 2.5m<sup>2</sup> Storage but the proposal only provides 1.7m<sup>2</sup> Storage.

**Table 3.3 Minimum space standards for new dwellings[7]**

Number of bedrooms	Number of bed spaces	Minimum GIA (m <sup>2</sup> )			Built-in storage (m <sup>2</sup> )
		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	

**Table 3.3 – Minimum Space Standards for new dwelling**

The proposal is deficient in storage space for the Units listed above which would be extremely inconvenient for future occupiers of the proposed development for the life of the development and therefore this proposed development **should be refused**.

## London Plan Housing SPG

Standard 26 - A minimum of 5sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1sqm should be provided for each additional occupant.

Standard 27 - The minimum depth and width for all balconies and other private external spaces should be 1500mm

Block A Units 1 02 & 1 03 require 7m<sup>2</sup> Private Amenity space but have none.

Block A Unit 2 01 requires 5m<sup>2</sup> Private Amenity Space but has none.

## Policy 3.6 Children and young people's play and informal recreation facilities

**A** The Mayor and appropriate organisations should ensure that **all children and young people have safe access to good quality, well-designed, secure and stimulating play and informal recreation provision**, incorporating trees and greenery wherever possible.

## Planning decisions

B Development proposals that include housing should make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs. The Mayor's Supplementary Planning Guidance [Providing for Children and Young People's Play and Informal Recreation](#) sets out guidance to assist in this process.

Using the **London Plan Planning Guidance interactive Spreadsheet** to evaluate the appropriate **"Play Spaces for children"** gave a requirement of **56%** under 5yrs, **30%** between 5 to 11 yrs. and **13%** 12 yrs., and above, gave a required total of **28.4m<sup>2</sup>** play area for estimated children of the proposed development of 6 x 1 bed; 8 x 2 bed; and 6 x 3 Bed flats (Market\*).  
 \*Using the GLA Benchmark standard of minimum **10m<sup>2</sup>** of dedicated play space per child.

The proposal has **no allocated** suitable Play Spaces for children which are safe and secure and within visible view from the associated flats. The application is therefore deficient in this policy requirement and **should be refused**.

The case that there is ample open space locally does not obviate the need for inclusion of **"safe and secure close Play Space for children"** specifically for the future occupants of these flats and this application **should therefore be refused**.

## Policy 6.13 Parking

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.

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.

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	

Using the applicant's Residential and Housing Densities for this proposal, the current London Plan Parking provision should be '**up to one place per unit**' thus requiring up to ≈20 parking spaces when there are just 10 spaces - 2 for Block A and 8 for Block B (one of which is for disabled parking). There are NO electric Charging points when at least 2 should be provided.

For the appropriate Residential Density of ≈150hr/ha and Housing Density ≈45u/ha in a suburban setting the allocation should be up to **1.5 spaces per dwelling** requiring **30 parking spaces** when there only 10 parking spaces. As such, this proposal **should be refused**.

## Emerging London Plan Policies (with minor suggested changes)

### Policy T6.1 Residential parking; Table 10.3 - Maximum residential parking standards

#### Outer London PTAL 2 - Up to 1 space per dwelling

G Disabled persons parking should be provided for new residential developments. Residential development proposals delivering ten or more units must, as a minimum:

- 1) ensure that for three per cent of dwellings, at least one designated disabled persons parking bay is available from the outset
- 2) demonstrate on plan and as part of the Parking Design and Management Plan, how an additional seven per cent of dwellings could be provided with a designated disabled persons parking space in future upon request. This should be provided as soon as existing provision is shown to be insufficient.

Therefore, the emerging London Plan requires Outer London Boroughs at PTAL 2 to have up to one car parking Space per dwelling and three % designated disabled which for this proposal would require 20 spaces and 1 Disabled at outset but capability for 2 disabled bays in future.

The proposal has only **10 bays** in total and therefore this proposal is significantly deficient in parking provision and **should therefore be refused** on grounds that overspill parking will contribute to congestion in surrounding residential streets.

## Heritage and Culture

### Policy HC7 Protecting public houses

A Boroughs should:

- 1) protect public houses where they have a heritage, economic, social or cultural value to local communities, and or where they contribute to wider policy objectives for town centres, night-time economy areas, Cultural Quarters and Creative Enterprise Zones
- 2) support proposals for new public houses where they would to stimulate town centres regeneration, Cultural Quarters, the night-time economy and mixed-use development, taking into account potential negative impacts where appropriate.

B Applications that propose the loss of public houses with heritage, cultural, economic or social value **should be refused** unless there is authoritative marketing evidence that demonstrates that there is no realistic prospect of the building being used as a pub in the foreseeable future.

**C** Development proposals for redevelopment of associated accommodation, facilities or development within the curtilage of the public house that would compromise the operation or viability of the public house use should be resisted.

### History and Heritage:

Despite Upper Shirley's relatively small area, it had previously been and continued to be a place of thriving industry at the time the Sandrock Hotel was built in 1867, following the development of workers' cottages along Sandpits Road in 1860. The extensive excavation of sand, much of which was transported to London to aid its fast-growing housing developments, was followed by John Bennett's extremely productive wood yard on the same site, the opposite end of Sandpits Road to the Sandrock Hotel. There was also a very productive and expanding nearby brewery.

Without doubt there would have been many of these local workers, aside from those working on the surrounding land etc., who would have welcomed their new hostelry, the name of which reflected the site on which it was built, a small elevated area where previously public religious meetings had been held.

By this time the Addington or, as they became known, the Shirley Hills had become famous due to their accessible countrified openness and outstanding extensive views, attracting visitors from far and wide. Perfectly situated at the base of the actual ascent, the Sandrock Hotel very quickly became a popular stopping off point for the 'tourists', especially from London. Its prominent position made it a landmark on the approach to the 'hills' and so it affectionally remains today.

It is this prominence, together with the Sandrock Public House's (previously Hotel) close association with a unique part of Croydon's area, which remains so important. Contained in Croydon's 'Designated Local Heritage Area' document it states "the Sandrock Public House on the corner of Sandpits Road is the focal point of the Upper Shirley Road. The layout reflects the historical development of the area, with a range of different plot shapes and sittings of buildings in relation to the street. Some high-quality townscape features are preserved such as brick and clay tile boundary walls and a few mature trees."

A local historian's comment on the conservation and earlier development of Addington Village wrote "the idea is to preserve the external appearance of an area whilst allowing internal alterations or new development in keeping with the surroundings". Although the Upper Shirley Road is deemed to be only a Designated Heritage Area, it is hoped that the same principle as that in respect of Addington Village would apply to the Sandrock Public House in order to preserve a scene which has been and still is a part of local social life.

## Current Croydon Local Plan Policies

### Policy DM1: Housing choice for sustainable communities

**Table 4.1** Minimum percentage of three bedroom or larger units on sites with ten or more dwellings

Suburban – areas with predominantly lower density development such as, for example, detached and semi-detached houses, predominantly residential, small building footprints and typically 2 to 3 storeys at **PTAL 2** requires **70%** to be **3 Bedroom**.



For this proposal that is **70% of 20 dwellings = 14 dwellings** when there are only six, three bedroomed flats are proposed. **Therefore, the proposed development is non-compliant to Croydon Plan Policy DM1 and should be refused.**

### Policy DM10: Design and character

**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.

**Nowhere in the Croydon Local Plan does it provide any detail guidance on Scale, Density or massing.** Therefore the only applicable policies for density and massing is the London Plan Policy 3.4 – Optimising Housing Potential as detailed above.

**6.38** Paragraph 57 of the National Planning Policy Framework advises planning authorities to 'plan positively for the achievement of high quality and inclusive design for all developments, including individual buildings, public and private spaces and wider area development schemes. Good design should contribute positively to making places better for people. **Design which is inappropriate in its context**, or which fails to take the opportunities available for **improving the character and quality** of an area and the way it functions, **should not be accepted.**'

This proposal does NOT reflect the character of buildings and dwellings in this locality and does NOT improve the character and quality of the area or the way it functions and therefore **should NOT be accepted**.

**6.50** The London Plan (in Policy 3.5B) also requires that '**all new housing developments should enhance the quality of local places**, taking into account physical context, **local character, density**; tenure and land use mix; and relationships with, **and provision of public, communal and open spaces**, taking account of the **needs of children and old people**'. This supports the need to increase the **communal amenity space standards** from those identified in the Mayor of London's Housing Supplementary Planning Guidance for sites in the borough to reflect local character or where there is a deficiency in open space.

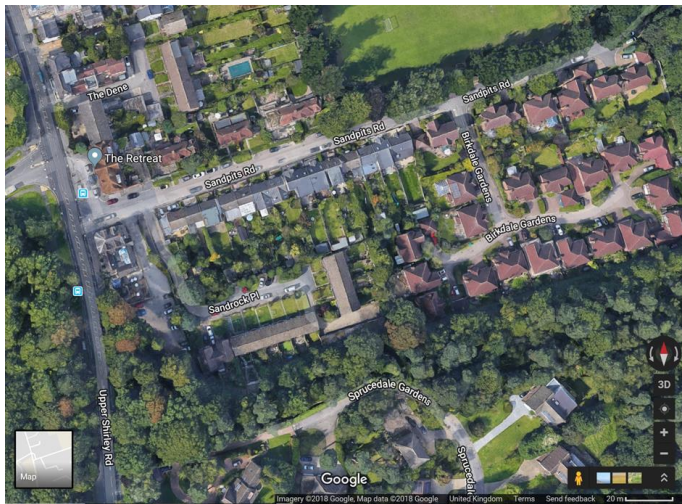
The proposed development does NOT enhance the quality of the local place taking into account physical context, local character, density and relationship with adjacent dwellings. There is NO provision of **communal open space** and it does NOT take account of the needs of **children or older people** and therefore this proposal **should be refused**.

### 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.

In the case of **development in the grounds of an existing building which is retained**, development **shall be subservient to that building**. The council will take into account cumulative impact.



**Fig 1 – Local Area showing NOT one flat roof in the local surrounding vicinity.**

The proposal development does NOT respect the height or character of adjacent dwellings of mainly single-story bungalows or two storey semi-detached, detached and terraced dwellings all with pitched roofs. The proposed development has a flat roof, totally out of character with surrounding dwellings and buildings.

The Google image shows NOT one flat roofed building in the vicinity, all have pitched roofs.

The proposed development is in 'the grounds of an existing building' which is retained and therefore should be subservient to that existing building (the Pub) as defined in Policy DM10.1. This proposed development could NOT in any way be considered subservient to the three storey **Sandrock Pub** as its mass is significantly greater than the Pub and it is four (4) Storeys high compared to the Pub's three storeys and is significantly denser than the existing Pub. This proposed development therefore does **NOT** comply with **policy DM10.1 in any respect and should therefore be refused.**

**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.

The proposed development parking is mainly on the forecourt and is **NOT** screened as far as can be determined from the proposed plans and is therefore **non-compliant to Policy DM10.2** and **should be refused.**

**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 **5m<sup>2</sup> per 1-2-person unit and an extra 1m<sup>2</sup> per extra occupant** thereafter;

**d. All flatted development and developments of 10 or more houses must provide a minimum of 10m<sup>2</sup> per child of new play space**, calculated using the Mayor of London's population yield calculator and as a set out in Table 6.2 below. The calculation will be based on all the equivalent of all units being for affordable or social rent unless as signed Section 106 Agreement states otherwise, or an agreement in principle has been reached by the point of determination of any planning application on the amount of affordable housing to be provided. When calculating the amount of private and communal open space to be provided, footpaths, driveways, front gardens, vehicle circulation areas, car and cycle parking areas and refuse areas should be excluded; and

**e. In the case of development in the grounds of an existing building which is retained, a minimum length of 10m and no less than half or 200m<sup>2</sup> (whichever is the smaller) of the existing garden area is retained for the host property, after the subdivision of the garden.**

As previously stated,

Block A Units 1 02, 1 03 require 7m<sup>2</sup> Private Amenity space but have none. Block A Unit 2 01 requires 5m<sup>2</sup> Private Amenity Space but has none. Therefore, the proposed development does NOT comply with Policy **DM10.4 para c)** and should be refused.

In addition, as this proposed development is for greater than 10 units, a minimum of 10m<sup>2</sup> **play space per child is required**. Based on the London Plan Policy interactive spreadsheet, a required total of 28.4m<sup>2</sup> play area for estimated children is required of this proposed development, but none has been provided and as such this proposed development does NOT comply with Policy **DM10.4 d)** and as such this application should be refused.

Also, as this proposed development is in the grounds of an **existing building which is retained**, it is extremely unlikely that policy **DM10.4 e)** is met with at least 10m length and 200m<sup>2</sup> area **retained by the Pub after subdivision of the grounds** and therefore the proposal does not comply with **Policy DM10.4 e)** and should 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**.

The proposed development does not include any acceptable **outdoor communal amenity space** as the terrain of the remaining land does not allow its acceptable use as high quality communal open space for residents. Therefore, the proposal does **Not** comply with **Policy DM10.5**. and should be refused.

**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.

The proposal does not comply with policy **DM10.6 c)** as the proposed development provides direct **overlooking** of **6 Sandpits Road** and **1A Sandrock Place private outdoor amenity space** and therefore does **result in direct overlooking into the gardens of 6 Sandpits and 1A Sandrock Place** and **should be refused**.

**DM10.7** To create a high-quality built environment, proposals **should demonstrate that:**

- The architectural detailing will result in a high-quality building and **when working with existing buildings**, original architectural features such as mouldings, architraves, chimneys or porches that contribute to the **architectural character of a building should**, where possible, **be retained**;
- High quality, durable and sustainable materials that respond to the local character in terms of quality, durability, attractiveness, sustainability, texture and colour **are incorporated**;
- Services, utilities and rainwater goods will be discreetly incorporated within the building envelope<sup>42</sup>; and
- To ensure the design of **roof-form positively contributes to the character** of the **local and wider area**; **proposals should ensure the design is sympathetic with its local context**.

The proposed development does not reflect **Policy DM10.7 d)** as the **roof form does not positively contribute to the character of the local or wider area** and is **NOT sympathetic with the local context** and **should be refused**.

Also, the proposed additional Flat developments do not incorporate any *architectural details* and *roof forms* of the original retained structure, namely of the existing Pub, as required by **Policy DM10.7 a), b) or d)** and **should be refused**.

### **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.

**DM13.2** To ensure existing and future waste can be sustainably and efficiently managed the Council will require a waste management plan for major developments and for developments that are likely to generate large amounts of waste.

The requirements for Refuse storage are given at Waste and Recycling in Planning Policy Document August 2015 Edited October 2018 Produced by LBC Waste Management Team. Section 4 Flats with 5 or more units.



#### 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.

There is no designated allocated **Refuse or Food Waste Storage** provision in any of the Flats shown on the provided plans which is contrary to the requirements. **This is contrary to the specified requirements and will be a significant issue for future occupants for the life of the proposed development.**

#### 4.3 External Storage – Capacity

The London Borough of Croydon will undertake one weekly or fortnightly collection of general waste. Recycling collections will be provided on a weekly or fortnightly basis and food recycling collected weekly, but developers should ensure there is sufficient bin storage capacity for the latter. Sufficient capacity for waste storage must be provided for each household to allow for extended gaps between collections owing to Bank Holidays, severe winter weather or other operational disruptions.

The London Borough of Croydon recommends that developers follow the guidance issued in this document. Flats with 9 units will require an 1100ltr for general waste, using this as a base the Council recommend 122.2trs per flat.

However, depending on how many bedrooms per flat/residents then Council would recommend using:

- 120ltrs – studio – 1 person
- 130ltrs – 1 bedroom – 2 persons
- 140ltrs – 2 bedroom – 3 persons
- 150ltrs – 3 bedroom – 4 persons
- 160ltrs – 3+ bedroom – 5+ persons

#### 3.5 External Storage – Location

Bin storage areas should be easily accessible for the dwellings that they serve, with residents being required to walk no further than **30m from their front door** (excluding vertical distances) when carrying general waste and recycling. For larger developments it may be necessary to provide several bin storage areas to ensure an adequate distribution across the site. The location of communal bin storage areas should have regard to the impact of noise and smell on the occupants of neighbouring properties, both existing and proposed.

After consideration of this document we contend that the Refuse Storage should be more central to the units to avoid the significant distance from the furthest residential unit to the refuse store as the maximum distance is recommended to be **no more than 30metres** from a unit's front door (excluding vertical distances).

The furthest distance is well over **30metres**. However, there are no lifts in the proposed development so all refuse from **above ground floor level** flats will need to be carried down the communal staircases. **This distance of over 30metres is contrary to the specified requirements and will be a significant issue for many future occupants for the life of the proposed development and therefore this proposal should be refused.**

#### 4.6 External Storage – Dimensions

All bins must be fully accessible from the front face, to allow for easy depositing of waste. Layouts that require bins to be swapped round mid-week are permissible if it is demonstrated that there will be site management presence at the development.

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.

All doors and alleys must be at least **2m wide** to allow for safe manoeuvring of bins.

The minimum internal height for a bin storage area and any access doorways is 2m. There should be no other internal fixtures or fittings that reduce the clearance above the bins, so that their lids can be opened fully.

The Sandrock Pub Refuse and Recycling Store bins are NOT accessible from the “front” face and need to be pulled into the central gangway for extraction to the refuse vehicle. However, as the space between facing bins is only **1.3metres**, it will not be possible or easy to turn the bins into the exit direction to extract and pull them to the refuse vehicle. There is a requirement for a 2metre clearance and there would be insufficient clearance to make such a manoeuvre.

The Refuse and Recycling Store for the Block B of 16 Flats has 1.7m door opening when the requirement is for a 2m clearance access.

We are therefore concerned that insufficient regard has been given to the location and capacity of the refuse storage and therefore this proposed development **should be refused** on grounds of location and capacity of the refuse storage.

## Protecting public houses

### Strategic Objectives and related Croydon Local Plan strategic policies

#### Strategic Objective 6

#### Policy SP5

#### Why we need this policy

**7.35** The National Planning Policy Framework in paragraph 69 states that the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. The loss of public houses over recent years has increased due to rising property values. The importance of **public houses as a community asset** has been acknowledged through the National Planning Policy Framework which requires local authorities to **‘plan positively’** for such uses. There is also a body of evidence produced by organisations such as CAMRA (The Campaign for Real Ale), the All-Party Parliamentary Beer Group and the Institute for Public Policy Research which also supports this view.

**7.36** The Institute of Public Policy Research's '**The Social Value of Community Pubs**' details the social and community importance of public houses and their importance as **hubs for development of social networks**. It notes the significant long-term consequences and associated costs for communities with a **lack of social infrastructure** which can support the wellbeing of individuals and communities. In May 2013 CAMRA advised that public house losses had been running at 26 per week in the six months to March 2013.

**7.37** The **London Plan Policy 3.16** cites the protection and enhancement of social infrastructure which can include **public houses** and encourages London boroughs to **develop policies to protect public houses as a community asset**.

## Policy DM21: Protecting public houses

The Council will not grant planning permission for the **demolition or change of use of a public house** which displays the characteristics of a community pub such as;

- space for organised: social events such as pub quizzes, darts competitions, pool leagues;
- **Meeting rooms**, performance spaces, room for hire (appropriately sound proofed);
- Ancillary facilities (skittles alley, children's play area); and
- **Associated clubs and teams**.

### Unless:

- a. The loss of the public house would not result in a shortfall of local public house provision of this type;
- b. **That the public house is no longer considered economically viable when considered against the CAMRA's Public House Viability Test; and that a range of measures have been undertaken to seek to improve viability including (but not restricted to):**
  - **Hosting quiz nights, craft fairs, live music or comedy;**
  - Food offer diversification;
  - Providing B&B Accommodation;
  - **Renting out space for meetings, classes or community events;**
  - Maintenance, repair and visual improvements;

### 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.

The proposed development is **NOT** of a design commensurate with the character, heritage and design of the Shirley "Place" as described in the Croydon Plan **para 11.202** and therefore does **NOT respect the character** of the locality within which it would reside and therefore this proposal **should be refused**.

## Conclusions

The proposal is an over-development for the area. The applicant's stated **Residential Density** is excessively high at **294.737hr/ha** which would require a **PTAL** of **5.263** and the applicant's stated **Housing Density** is also excessively high at **105.263 u/ha** which would require a **PTAL** of **5.175** when the actual **PTAL** is just **2**. The appropriate **Residential Density** at a suburban setting at **PTAL 2** is **≈150hr/ha** but the actual Residential Density of the proposal at **294.737hr/ha** which is a **96.491% increase from that recommended**. The appropriate Housing Density at a suburban setting at **PTAL 2** is **≈40u/ha** but the actual Housing Density of the proposal is **105.263u/ha** which is an **163.157% increase from that recommended**. These densities for this location at **PTAL 2** at such a high percentage increases are **NOT justifiable** and **compromise the London Plan Policy 3.4 – Optimising Housing Potential and should therefore be resisted – that is Refused**.

This is supported by the current London Plan Policy 3.4 Optimising Housing Potential which our calculation shows the Residential Density to be calculated Residential and Housing Densities being equally high at **271.67hr/ha** and **86.24u/ha** respectively requiring a PTAL of either **4.956** or **5.041** respectively when the actual **PTAL for the locality is just 2**. There is no justification as defined in the Housing SPG for these excessive densities which is clear evidence of excessive over-development for the locality and should therefore result in a **refusal of this proposed development**.

The proposed developments massing and height do not reflect the local character and roof forms of the surrounding locality.

The proposed development does not comply fully with minimum spaces standards for new dwellings or fully comply with the required amenity space standards.

There is no usable communal open space for the future occupants of the proposed development and there is no provision of children's play spaces for children of the future occupants of the development.

The percentage of three-bedroom dwellings does NOT meet the **Strategic Policy DM1** for this proposal which should provide **70% of 20 dwellings = 14 three-bedroom dwellings** when there are only six, three bedroomed flats proposed. Therefore, the proposed development is **non-compliant to Croydon Plan Policy DM1**.

The development is **within the grounds of an existing building** and is most definitely **NOT subservient** in terms of **height and massing** and therefore is **non-compliant** to the Croydon Plan Design and Character policies of **DM10**. In addition, the host building **does not retain any garden** after partitioning and is **non-compliant to Policy DM10.4 e)**.

The proposal's Refuse Storage facilities do not meet the required capacities for refuse bins and does not give adequate manoeuvrability space for operatives to access and remove refuse



and recycling bins safely. In addition the location of the Refuse storage is too far from the furthest flats and does not meet the **30m metre distant guidelines**.

This proposal has **insufficient car parking space** and will result in overspill on street parking in the surrounding streets which will cause significant problems to adjacent existing residents. There would be major overlooking and invasion of privacy to the occupants of number 6 Sandpits Road and 1A Sandrock Place private outdoor space and therefore does result in direct overlooking and should be refused.

For all the foregoing reasons, **this proposed development is totally inappropriate for the locality** in terms over-development of **Residential & Housing Densities** at a low **PTAL of 2** in a suburban setting.

We therefore formally object to this planning application for the foregoing reasons and request that you **refuse this application on the grounds listed above** and any further reasons that we might have overlooked.

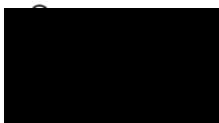
Please acknowledge receipt of this **formal objection** and that it has been received within the appropriate consultation period for this application, to email address at: [planning@mo-ra.co](mailto:planning@mo-ra.co)

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

Yours sincerely



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



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

**Cc:**

Sarah Jones MP

Mr. Pete Smith

Cllr. Gareth Streeter

Cllr. Sue Bennett

Cllr. Richard Chatterjee

Cllr. Jason Cummings

Cllr. Scott Roche

Croydon Central

Head of Development Management (Croydon LPA)

Shirley North Ward Councillor

Shirley North Ward Councillor

Shirley North Ward Councillor

Shirley South Ward Councillor

Shirley South Ward Councillor

**Bcc:**

MORA

Trevor Ashby

Local Affected Residents' and interested parties

Executive Committee

SPRA President