

To: Case Officer – Mr Nathan Pearce
Development Environment
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From:
Monks Orchard Residents' Association
Planning

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8 May 2019
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Reference:	19/01761/FUL
Application Received:	Fri 12 Apr 2019
Application Validated:	Fri 12 Apr 2019
Address:	Pegasus Fairhaven Avenue Croydon CR0 7RX
Proposal:	Demolition of existing dwelling and erection of a 3-storey block containing 3 x 3-bedroom Houses and 6 x 2-bedroom Apartments with associated access, 9 parking spaces, cycle storage and refuse store.
Consultation Close:	Fri 17 May 2019
Target Date:	Fri 07 Jun 2019
Case Officer:	Nathan Pearce

Dear Mr Pearce

The Monks Orchard Residents' Association (MORA) represents 3,879 residential households 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 for the life of the development and that proposed developments respect the character of the area for which it is destined.** Also, that proposed developments have the appropriate **Housing** and **Residential Densities** which are supported by the current and proposed local Public Transport and other public service Infrastructure to support the additional future occupants of the proposed development.

We only object to development proposals that **do not comply with current adopted planning policies** which are designed to **curtail over-development, meet acceptable accommodation standards for future occupants for the life of the development 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 6.13 Parking

Croydon Local Plan adopted Policies:

Policy DM10: Design and character

Policy DM13: Refuse and recycling

Policy DM25: Sustainable Drainage Systems and Reducing Flood Risk

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:

18a (Pegasus) Fairhaven Avenue											
Site Area		1071	sq.m.	0.1071	ha						
Dwellings		9									
Housing Density		84.03	u/ha								
	Floor Level	Bedrooms	Habitable Rooms	Occupants Bed Spaces	GIA	GIA Table 3.3	Storage Provided	Storage Space Table 3.3	Private Amenity	Private Amenity Req'd	Communal Open Space
House 1	GR/1/2	3	4	5	113	99	2.59	2.5	75	8	0
House 2	GR/1/2	3	4	5	113	99	2.59	2.5	36	8	0
House 3	GR/1/2	3	4	5	113	99	2.59	2.5	50	8	0
Appartment 1	Gr	2	3	3	66	61	1.75	2.0	8	6	24
Appartment 2	Gr	2	3	3	66	61	1.05	2.0	8	6	24
Appartment 3	1	2	3	3	71	61	1.04	2.0	6	6	24
Appartment 4	1	2	3	3	70	61	0.72	2.0	6	6	24
Appartment 5	2	2	3	3	61	61	0.63	2.0	5	6	24
Appartment 6	2	2	3	3	62	61	1.19	2.0	5	6	24
Totals		21	30	33	735	663	14.14	19.5	199	60	144
Residential Density		280.11	hr/ha	PTAL Req'd	5.07		New London Plan Policy D6				
Average hr/u		3.33	hr/u				Post Code		CRO 7RX		
Housing Density		84.03	u/ha	PTAL Req'd	4.97		Dwellings in Post Code Area		38	VOA	
PTAL	Base Year	1a					Post Code Area		1.4	ha	
PTAL	2031	1a					Housing Density for Post Code		27.14	u/ha	
Bedspaces/ha		308.12	bs/ha				Demolished Dwellings		1		
Bedrooms/ha		196.08	b/ha				New Dwellings		9		
3 Bedroom Units		0.27	%				New Dwellings in Post Code		46		
Car Parking		9					New Housing Density for area		32.86	u/ha	
Parking Allocation/ person		0.27	2.97 %				Percentage Increase in Density		21.08	%	
Disabled Bays		1	0.09 %								
Electric Charging Bays		4	0.36 %								

Analysis of proposal against current NPPF and Adopted Planning Policies

The type face with green background are **current adopted** Planning Policies.

NPPF (July 2018)

Achieving appropriate densities

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

- the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
- local market conditions and viability;

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



- 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.

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 Site Area is **0.1071 hectares** and the proposal has **30 habitable rooms** which equates to a **Residential Density** of $30/0.1071 \text{ hr/ha} = \mathbf{280.11 \text{ hr/ha}}$.

Similarly, the proposed development has **9 units** on a site area of **0.1071 hectares**, giving a **Housing Density** of $9/0.1071 \text{ units/hectare} = \mathbf{84.03 \text{ u/ha}}$.

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 to 200 hr/ha**. However, the proposed development has **Residential Density** of **280.11 hr/ha** which is appropriate for **Residential Densities** in the range **200 to 350 hr/ha** and 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 **280.11 hr/ha** should follow the straight-line graph of: $y = mx + c$

where $m = (\Delta y / \Delta x)$ slope, y = Residential Density, x = PTAL and c = y intercept when $x = 0$

Then, $280.11 = \left(\frac{\Delta y}{\Delta x}\right)x - 100 = \left(\frac{350-200}{6-4}\right)x - 100$; which gives: $\frac{280.11+100}{75} = x = 5.068 = \text{PTAL}$

In addition, the **Housing Density** of the proposed development is $9/0.1071 \text{ u/ha} = \mathbf{84.03 \text{ u/ha}}$. 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 to 65 u/ha**. However, the proposed development has a **Housing Density** of **84.03 u/ha** which is appropriate for **Housing Densities** in the range **55 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 **84.03 u/ha** should follow the straight-line graph of: $y = mx + c$

where $m = (\Delta y / \Delta x)$ slope, y = Housing Density, x = PTAL and c = y intercept when $x = 0$.

Then, $84.03 = \left(\frac{\Delta y}{\Delta x}\right)x - 30 = \left(\frac{115-55}{6-4}\right)x - 65$; which gives: $\frac{30+65}{30} = x = 4.967 = \text{PTAL}$

The appropriate **Residential Density** at PTAL 1a (=0.66) is given by:

$$y = \left(\frac{\Delta y}{\Delta x} \right) 0.66 + 150 = \left(\frac{200-150}{1-0} \right) 0.66 + 50 = 50 * 0.66 + 50 = 183 \text{ hr/ha, and}$$

The appropriate **Housing Density** at PTAL 1a (=0.66) is given by:

$$y = \left(\frac{\Delta y}{\Delta x} \right) 0.66 + 40 = \left(\frac{65-40}{1-0} \right) 0.66 + 40 = 25 * 0.66 + 40 = 56.5 \text{ u/ha}$$

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 5.07 HD 4.97)
Suburban	150–200 hr/ha (≈183hr/ha)	150–250 hr/ha	200–350 hr/ha (280.11 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 (3.33 hr/u)	40–65 u/ha (≈56.5u/ha)	40–80 u/ha	55–115 u/ha (84.03 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

This proposal is clearly a **significant over development** for this location which can be illustrated at the Table 3.2 above, an extract from the **London Plan Density Matrix Table 3.2** at a **suburban setting** to show 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 **280.11hr/ha** is **totally inappropriate** for the locality which has a **PTAL** of **1a** (≈0.66) but would **actually require** a **PTAL** of **5.07** in the broad ranges **4 to 6** shown on **Table 3.2**. The **appropriate** value for **Residential Density** at this **Suburban setting** and at **PTAL 1a** with an average of **3.33 hr/u** should be **≈ 183hr/ha (Blue Text)**.

Similarly, a **Housing Density** of **84.03u/ha** is **totally inappropriate** for a locality of **PTAL 1a** but would **actually require** a **PTAL** of **4.97** in the highest range **4 to 6**, but the locality has a **PTAL** in the lowest range at a suburban setting. The **appropriate** value for **Housing Density** at this setting and **PTAL** of **1a** with an average of **3.33 hr/u** should be **≈ 56.5u/ha (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)**.

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 1a 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 site¹⁰². 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**¹⁰³. 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**¹⁰⁴.

1.3.51 In **appropriate circumstances**, it may be acceptable for a particular scheme to **exceed** the ranges in the density matrix, **providing important qualitative concerns are suitably addressed**. However, to be supported, schemes which exceed the ranges in the matrix must be of a high design quality and **should be tested against the following considerations**:

- the factors outlined in Policy 3.4, including local context and character, public transport capacity and the design principles set out in chapter 7 of the London Plan;
- the location of a site in relation to existing and planned public transport connectivity (PTAL), social infrastructure provision and other local amenities and services;
- the need for development to achieve high quality design in terms of liveability, public realm, residential and environmental quality, and, in particular, accord with the housing quality standards set out in Part 2 of this SPG;
- a scheme's overall contribution to local 'place making', including where appropriate the need for 'place shielding';
- depending on their particular characteristics, the potential for large sites to define their own setting and accommodate higher densities;
- the residential mix and dwelling types proposed in a scheme, taking into account factors such as children's play space provision, school capacity and location;
- the need for the appropriate management and design of refuse/food waste/recycling and cycle parking facilities; and

• whether proposals are in the types of accessible locations the London Plan considers appropriate for higher density development (e.g. **town centres, opportunity areas, intensification areas, surplus industrial land, and other large sites**).

1.3.52 where these considerations are satisfactorily addressed, the **London Plan provides sufficient flexibility** for such higher density schemes to be supported. It should, however, be recognised that this is not an exhaustive list and other more local or site-specific factors may also be given appropriate weight, taking into account the particular characteristics of a proposed development and its impact on the surrounding area.

This location does **NOT** have good public transport access, is **NOT** for mixed-use development in a **town centre, opportunity area or intensification area**, or is **surplus industrial land** or another large site. The applicant has **NOT given any justification** or mentioned any reason for higher densities in their **Design and Access Statement** or given any other reason for **increased Housing or Residential Density** above the recommended ranges at this location of **PTAL 1a** and therefore the proposed **Densities significantly compromise the current London Plan Policy 3.4 on Optimising Housing Potential and should therefore be refused**.

We request that this application be refused on grounds of being **inappropriate unacceptable** and of **exceptionally high Housing and Residential Densities** at this 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 [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 **removal 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^[1]).

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**.

See:

<http://www.mo-ra.co/planning/planning-report-april-2019/#2022TheGlade>

Draft London Plan Policy D6, D2 & D1

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.

[1] All Representations for the London Plan EiP Hearing M39-Density 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>

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) which shows a **21.08% increase in Housing Density** for 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.

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.**

Table 3.3 Minimum Space Standards for new Dwellings					
Number of bedrooms	Number of bed spaces	Minimum GIA (m ²)			Built-in storage (m ²)
		1 storey	2 storey	3 storey dwellings	
		dwellings	dwellings		
1b	1p	39 (37)*			1.5
	2p	50	58		
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	

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

In order to meet the strategic objectives, set out in the London Plan Policy 3.5, specific requirements for **minimum space Standards for New Dwellings** have been defined as set out in **Table 3.3**.

The Apartment 1 has ≈1.75m² whereas the requirement is for 2m² Storage Space.
The Apartment 2 has ≈1.05m² whereas the requirement is for 2m² Storage Space.
The Apartment 3 has ≈1.04m² whereas the requirement is for 2m² Storage Space.
The Apartment 4 has ≈0.72m² whereas the requirement is for 2m² Storage Space.
The Apartment 5 has ≈0.63m² whereas the requirement is for 2m² Storage Space.
The Apartment 6 has ≈1.19m² whereas the requirement is for 2m² Storage Space.
Apartments 5 and 6 are deficient in Private Amenity Space by 1m² each respectively.

The proposed development therefore does not fully meet the minimum space standards for storage capacity or fully meet the private amenity space for apartments 5 and 6 which would be **detrimental and an inconvenience for future occupants for the life of the development and therefore this proposed development should be refused.**

London Plan Policy 6.13 Parking

Policy

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.

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.

E

a the maximum standards set out in Table 6.2 in the Parking Addendum should be used to set standards in DPDs.

e **outer London boroughs** should demonstrate that they have **actively considered more generous standards for housing development in areas with low public transport accessibility (generally PTALs 0 -1)** and take into account current and **projected pressures for on-street parking and their bearing on all road users**, as well as the criteria set out in NPPF (Para 39).

Parking for residential development

Taking into consideration **Policy 6.13 C and E e)** above at **PTAL 1a** in a suburban setting at the appropriate Residential Density of **≈ 183hr/ha** and appropriate Housing Density of **≈ 56.5u/ha** at an average of **3.33 hr/u**, the parking requirement as given in Table 6.2 (see below) indicates up to 2 spaces per unit, which would require **18 parking spaces for this proposal.**

Policy 6.13 E e) states that “Outer London Boroughs **SHOULD DEMONSTRATE** they are actively considering **MORE GENEROUS** Standards in areas of low Public Transport Accessibility (PTAL’s 0-1) taking due account of the pressures of overspill onto on-street parking **which applies to this proposal at a PTAL of 1a.**

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		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	Up to 1.5 spaces per unit	55–145 u/ha		55–225 u/ha	
2.7–3.0 hr/unit	50–95 u/ha		70–170 u/ha	Up to one space per unit	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		140–290 u/ha	Up to one space per unit
3.1–3.7 hr/unit	40–100 u/ha		80–210 u/ha	Up to one space per unit	175–355 u/ha	
2.7–3.0 hr/unit	50–110 u/ha	Up to one space per unit	100–240 u/ha		215–405 u/ha	

Current Adopted London Plan Table 6.2 – Residential Parking

New Draft London Plan

The New Draft London Plan Policy T6 Car parking Standards are given at Table 10.3

Table 10.3 -Maximum residential parking standards

Outer London PTAL 0 –1 Up to 1.5 spaces per dwelling

This would equate to 13.5 > 14 appropriate parking spaces for this proposed development.

This proposed development location has PTAL of 1a and forecast to be 1a until 2031.

Fairhaven Avenue is a cul-de-sac of length of $\approx 122\text{m}$ and width $\approx 5\text{m}$ with a bend starting at 55m from the junction with Gladeside and any on-street parking would cause **significant parking stress** due to the restricted road width and length which include an awkward bend.

The entrance to the proposed development is via a dropped kerb from the turning head off Fairhaven Avenue which must be kept clear at all times for the availability of any vehicle entering Fairhaven Avenue to be able to turn around to exit in a forward gear. The actual **physical measured** drive access width at the boundary with the footway is **2.83 metres** and at the gate posts further into the drive, the width is **3.0m width** (as measured by a local resident). The access drive widths as shown on the applicant's plans show exactly **3m width** (scaled off the applicant's plans when magnified to 112% when 1cm = 1m) **which is slightly misleading as it does not reflect the 2.83m width restriction** at the footway boundary.

SPD2 Suburban Residential Development guidance:

New driveways and Hardstanding 2.29.5 states:

"New driveways should be designed in accordance with Figure 2.29e and 2.29f." (see below). However, this illustration is for a **single dwelling drive** and for drive to a **hardstanding** – NOT an access drive for a small **backland estate development of 9 dwellings**.

This existing width would be acceptable for a single family dwelling's occasional entrance and exit but is **totally unacceptable** for access to a small **backland estate development** accommodating **33 occupants** and **9 cars** and to provide access for the various delivery vehicles to the **9 dwellings**, lorries for building construction and materials and removal Pantechicons for furniture and white goods delivery when new occupants move in to the new dwellings. The Drive Access width as required by **SPD2 Section 2.29** is **3.6m minimum** with a **3.3m visibility splay** from the centre of the drive to either side for safety of pedestrians (See fig 29e). The adjacent wall RHS view toward the drive is greater than 0.6m. This proposal with drive width of **2.83m** does **NOT** meet this SPD2 requirement and **should therefore be refused**.

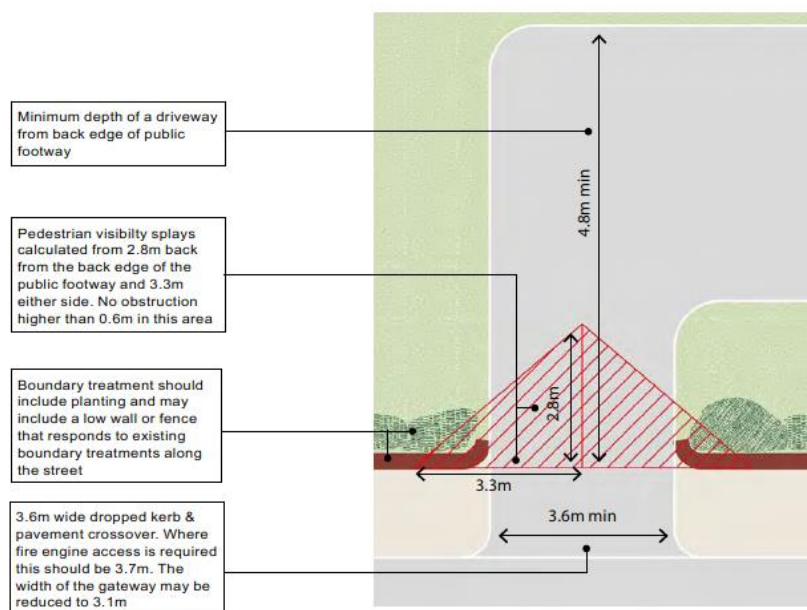


Figure 2.29e: Requirements for entrances and boundary treatments.

The **Shirley North 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.

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 Required 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
18a Fairhaven Avenue	19/01761/FUL		1	Not Known	9	30	33	Not Known	0.1071	84.03	280.11	5.07	308.12	9	0.2727	1a = 0.66
Total			17	39	115	437	442	323	2.1325	1197.81	4260.23	49.53	4386.53	145	8.2223	
Average									0.1066	59.89	213.01	2.48	219.33	7.25	0.41	

Local redevelopments and infill developments in the MORA (Post Code) 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 **442 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.**

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:

- be prepared with the objective of contributing to the achievement of **sustainable development**¹⁰;
- 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).

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.**

As a consequence, the **MORA comments** on **Croydon Plan Policy DM10.1** and **para 6.37** are comprised 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.

The parking provision is **all on the forecourt fronting Fairhaven Avenue** cul-de-sac which is **contrary to Policy DM10.2**. There is no perceptible screening to meet the policy requirement.

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

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

The proposed development apartments 5 and 6 do not fully meet the required Private Amenity Space as required by DM10.4 c) and therefore would be deficient for the life of the proposal.

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.

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:

- a) be prepared with the objective of contributing to the achievement of sustainable development¹⁰;
- 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).

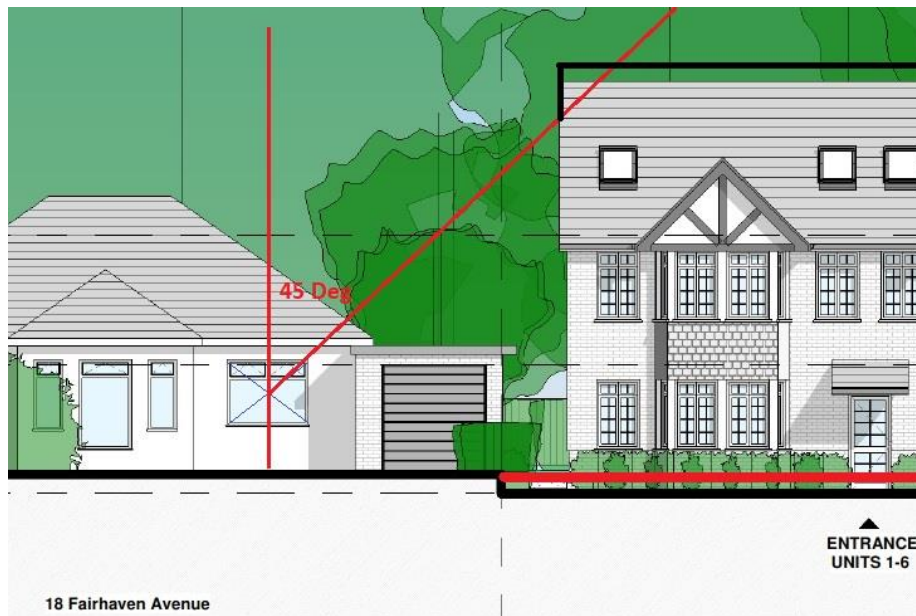
Without specifying the **allocation per occupant**, the **Croydon Local Plan** at **DM10.5** does not provide **adequate guidance for applicants** to meet the policy and the policy does **NOT** meet the guidance required by **NPPF Para 16 d)**.

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

- a. The amenity of the occupiers of adjoining buildings are **protected**; and that
- b. They do not result in **direct overlooking** at close range or habitable rooms in main rear or private elevations; and that

- c. They do not result in direct overlooking of **private outdoor space** (with the exception of communal open space) within **10m perpendicular** to the rear elevation of a dwelling; and that
- d. Provide adequate **sunlight and daylight to potential future occupants**; and that
- e. They do not result in significant loss of existing sunlight or daylight levels of adjoining occupiers.

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.



Illustrations of the 45° Rule regarding the adjacent property

This illustrates that the proposed development **fails to meet this 45° rule on height 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 ≈0.5m hole in the ground** in order to meet the surrounding properties height restriction. **If the built form is NOT actually sunk into the ground**, the built form would be **≈0.5m 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.**

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:

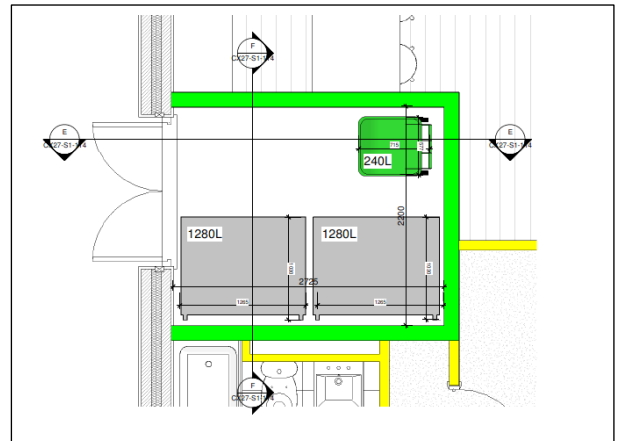
- a. **Sensitively integrate refuse and recycling facilities** within the **building envelope**, or, in conversions, where that is not possible, integrate within the landscape covered facilities that are **located behind the building line** where they will not be **visually intrusive** or compromise 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.**

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.**

See Also:

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

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.**



BS 5906:2005 Para 7.2.1 states:

Houses, bungalows and maisonettes:

*“The storage and collection of segregated household waste for these dwellings are best considered by the provision of **individual storage containers for each dwelling.**”*

None are provided for the House Units. The House Units have no refuse or recycling storage facilities so will need to use the communal Refuse and Recycling Store but we believe the communal Refuse and Recycling Storage is inadequate for the proposed total of 9 dwellings and 33 occupants if it also includes those within the three House Units. The distance from House Unit 1 to the Communal Refuse Storage is approximately **35metres** which is an unacceptable distance to carry refuse. An occupier should not be required to carry waste a distance of more than **30 m.** (British Standards BS 5906:2005 Para 7.2.2). *“Waste storage chambers, detached or as part of the building, should be sited **within 30 m** (excluding any vertical distance) from each dwelling.”*

The pull route to the Refuse Vehicle is only **1m wide** (inappropriate) which is insufficient for the **1280L Refuse Bins** to be maneuvered along the length of the pathway and the surface of the pathway is intermittent paving slabs which, over time will become uneven and bumpy, allowing the bin wheels to foul the paving slabs or sink into the gaps between the slabs. This passageway solution is not wide enough to physically allow removal of the 1280L capacity Refuse Bins or conducive to long term use and should be avoided.

The Waste and Recycling in Planning Policy Document at **Para 4.6** states: All doors and alleys must be at least **2m** wide to allow for safe maneuvering of bins. Doors must not open outward over a public footway or road, and should not cause an obstruction to other access when in an open position. They should be able to remain or be secured in the open position so that access for collection staff is unimpeded when the bins are being emptied. The proposal does not meet these requirements.

Considerable fire risks are involved when large quantities of waste or recycled materials are stored. Therefore, waste storage chambers should be situated in readily accessible positions and, where practicable, suitable precautions provided, e.g. sprinklers, fire extinguishers and smoke detection equipment (see BS 5906:2005 para 4.9).

“Internal waste storage rooms should be constructed within a fire compartment structure, which is designed to contain a fire. Where risks are greater, for example in multi-storey buildings or in hospitals or hotels, suitably sized manual fire extinguishers should be deployed. For larger risks, a dedicated automatic fire sprinkler or water mist system should be considered.” This should be of **significant importance** as the Refuse Storage is within the building envelope adjacent to a ground floor flat designated as **disabled persons accommodation**.

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 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**, the **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** or **BS 5906:2005**.

Policy DM25: Sustainable Drainage Systems and reducing flood risk

DM25.1 The Council will ensure that development in the borough reduces flood risk and minimises the impact of flooding by:

- Steering development to the areas with a lower risk of flooding;
- Applying the Sequential Test and Exception Test in accord with Table 8.1;
- Taking account of all sources of flooding from fluvial, surface water, groundwater, sewers, reservoirs and ordinary watercourses; and
- Applying the sequential approach to site layout by locating the most vulnerable uses in parts of the site at the lowest risk of flooding.

DM25.2 In areas at risk of flooding development should be safe for the lifetime of development and should incorporate flood resilience and resistant measures into the design, layout and form of buildings to reduce the level of flood risk both on site and elsewhere.

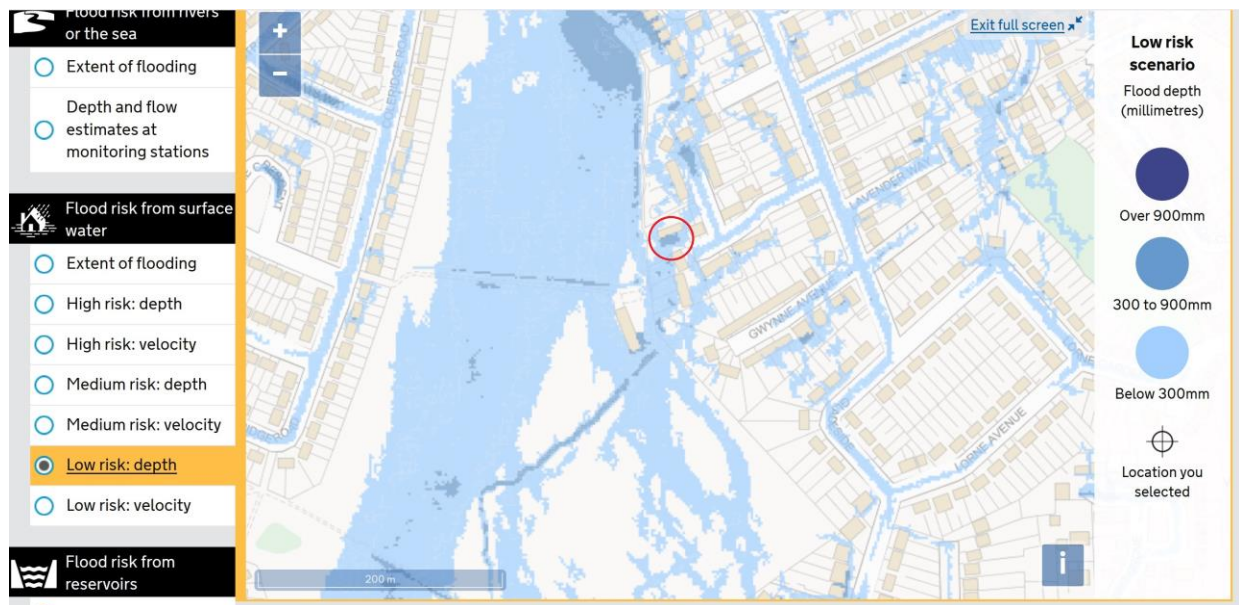
DM25.3 Sustainable drainage systems are required in all development and should:

- Ensure surface run-off is managed as close to the source as possible;
- Accord with the London Plan Sustainable Drainage Hierarchy;
- Achieve better than greenfield runoff rates;

d. Be designed to be multifunctional and incorporate sustainable drainage into landscaping and public realm to provide opportunities to improve amenity and biodiversity;

e. Achieve improvements in water quality through an sustainable drainage system management train; and

Be designed with consideration of future maintenance.



The proposed development is in a low risk flood area which has a possible **300mm to 900 mm** flood depth as indicated in the above Environment Agency Flood Map (Circled) exacerbated by the proposed development being sunk into a **≈0.5 metre hole in the ground**.

Chaffinch Brook Flood Alleviation Study (FAS)

“Until recently, it was considered that the main flooding source around the Chaffinch Brook was fluvial. However, it has been illustrated that flooding issues in the vicinity of the Chaffinch Brook are attributed to multiple sources including directly from watercourses, groundwater, surface water and surcharging culverts and sewers. The interaction of flooding mechanisms from these different sources is not fully understood at present in the Chaffinch Brook catchment.”

“The Chaffinch Brook FAS seeks to improve the understanding of flooding in this location and identify feasible options for reducing flood risk within the catchment.”

It is understood that the surface water, soil and sewage from this area, which includes Fairhaven Ave, is routed into the same drains as the Chaffinch Brook culvert under the Ashburton Playing fields. The culvert is there to prevent flooding of the properties at the Bywood Avenue end of the playing fields, including properties in Fairhaven Avenue. This proposed development will increase the volume of surface water and soil waste and sewage into these drains and in times of high precipitation could significantly increase the probability of higher surface water flooding due to the increased number of households.

The proposed development should be informed to the **Chaffinch Brook FAS** for their evaluation and for their comments to be considered.

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.

This proposed development is approximately **1km** from the nearest Tram stop and **530m** from the nearest **367 Bus Stop**. 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 **442**. 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 is causing increased travel congestion and local passenger frustration. An additional **Bus Service 689** has been introduced to serve local schools, specifically for the school run and 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:

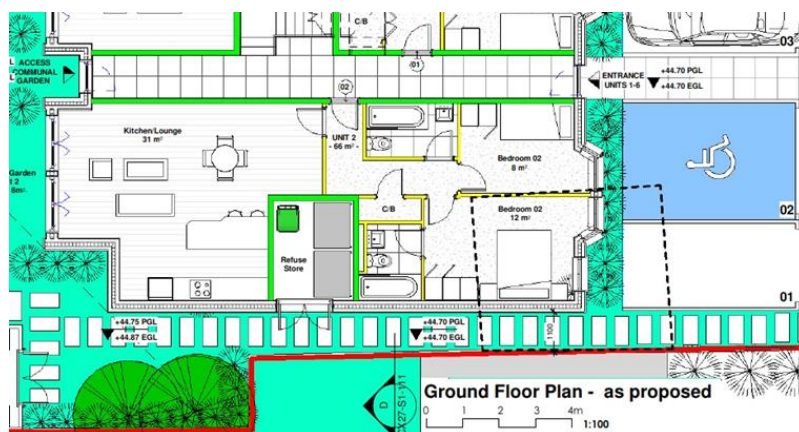
- a. Reduce the impact of car parking in any development located in areas of good public transport accessibility⁹⁷ or areas of existing on-street parking stress;
- b. **Ensure that the movement of pedestrians, cycles, public transport and emergency services is not impeded by the provision of car parking;**
- 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;**

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, there is 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 at low PTAL locations.

This location is a typical reason why it is appropriate to meet the London Plan higher provision due to this locality's amount of local on-street parking and the fact that the local road is a cul-de-sac of only **5metres** width and cannot cope with additional on-street parking which reduces the available road width to other road users and clogs the turning head.

Disabled Person Accommodation

It is assumed that Apartment Unit 2 is allocated to the disabled occupant as the disabled parking bay is directly to the front forecourt of this unit. However, the entrance to this dwelling is considered inadequate width as wheelchair access requires an opening of at least 0.815m door opening or 0.915m for a passageway.



Disabled person accommodation at Unit 2

The door opening is barely $\approx 0.8\text{m}$ and the passageway barely ≈ 0.9 as scaled off the supplied drawings with a 90° turn into the lounge or a 90° turn in the passageway which would be high impossible for a self-drive wheelchair to turn. This proposed apartment development is **NOT** appropriate for disabled persons requiring wheelchair accessibility. It is considered that the internal doors are also not wheelchair access wide.

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!)**

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 proposed residential occupancy of **442** 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 are **unacceptable for future occupants** for the life of the development.

- We **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 280.11hr/ha** and **excessive Housing Density 84.03u/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**.
- A **Residential Density of 280.11hr/ha** is **totally inappropriate** for the locality which has a **PTAL of 1a (≈0.66)** but would **actually require a PTAL of 5.07** in the broad ranges **4 to 6** shown at **Table 3.2**. The **appropriate** value for **Residential Density at this Suburban setting** and at **PTAL 1a** with an average of **3.33 hr/u** should be **≈ 183hr/ha (Blue Text)**. Similarly, a **Housing Density of 84.03u/ha** is **totally inappropriate** for a locality of **PTAL 1a** but would actually require a **PTAL of 4.97** in the highest range **4 to 6**, but the locality has a **PTAL** in the lowest range at a suburban setting. The **appropriate** value for **Housing Density** at this setting and **PTAL of 1a** with an average of **3.33 hr/u** should be **≈ 56.5u/ha (Blue Text)**.
- We object to this proposed development on the grounds that the proposed dwelling does **NOT** fully meet the required **minimum space standards** as required by the current adopted **London Plan Policy 3.5** as defined at **Table 3.3** with respect to no **minimum Storage Space for Apartment Units 1 to 6**. Also, the proposal has **inadequate** provision of **Private Amenity Space for Apartment Units 5 & 6** as required of **London Plan Policy 3.5. minimum space standards** and should therefore be refused.
- We **object** on the grounds that the **width of the access drive is totally unacceptable** for access to a development accommodating **33** occupants and **9** cars and would not allow access for various delivery vehicles to the **9** dwellings, lorries for building construction and materials or removal Pantechincons for furniture and white goods delivery when new occupants move in to the new proposed dwellings. The access fails to meet the requirements of SPD2 guidance.
- Taking into consideration **London Plan Policy 6.13 C and E e)** above at **PTAL 1a** in a suburban setting at the **appropriate Residential Density of ≈183hr/ha** and **appropriate Housing Density of ≈56.5u/ha** at an average of **3.33 hr/u**, the parking requirement as given in **Table 6.2** indicate up to **2 spaces per unit**, which would require **18 parking spaces for this proposal**. **Policy 6.13 E e)** states that “Outer London Boroughs **SHOULD DEMONSTRATE** they are actively considering **MORE GENEROUS** Standards in areas of low Public Transport Accessibility (PTAL’s 0-1) taking due account of the pressures of overspill onto on-street parking which applies to this proposal.



- 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 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 18 Fairhaven Avenue**. The proposed development is to be **sunk into a ≈0.5m hole in the ground** in order to meet the surrounding property's height restriction. If the built form is **NOT** sunk into the ground, the built form would be **≈0.5m higher** and the projected **45° Rule** would show much more of the proposed development and would be further above the **45° projection** and significantly greater non-compliance to the policy. **The built height is therefore extremely critical.**
- We **object** to this proposed development on significant issues relating to Refuse Storage facilities on grounds that it does **NOT fully** meet the requirements of **Policy DM13.1, DM13.2 on Refuse and Recycling** or requirement of **BS 5906:2005** and that the PULL route passageway is too narrow for maneuvering the **1280L Refuse Bins** over an uneven pathway to the refuse vehicle.
- The proposed development is in a low risk flood area which has a possible **300mm to 900mm flood depth** as indicated in the above Environment Agency Flood Map exacerbated by the proposed development being sunk into a **≈0.5 metre** hole in the ground. This proposed development will increase the volume of surface water, waste water and sewage into the Chaffinch Brook Culvert and in times of high precipitation could significantly increase the probability of high surface water flooding due to the increased number of households.
- This proposed development is approximately **1km** from the nearest Tram stop and **530m** from the nearest **367 Bus Stop**. As previously stated, recent piecemeal development in the Shirley North Ward is a typical reason why it is appropriate to meet the London Plan higher provision due to this locality's amount of local on-street parking and the fact that the local road is a cul-de-sac of only 5metres wide and cannot cope with additional on-street parking which reduces the available road width to other road users.
- The Disabled person accommodation does not have adequate wheelchair accessibility to enter the dwelling, or to negotiate the internal residential areas and rooms with adequate turning facilities and is therefore unacceptable for disabled person occupation.
- We conclude that the proposed development is an **overdevelopment** for the locality and does **NOT** respect the existing **local surrounding 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 **442 persons** resulting from in-fill and redevelopment and therefore the policy **Shirley Place Transport para 11.205** has **NOT** been fulfilled.

We object to this proposed development on the aforementioned grounds and non-compliance to planning policies and any that we have overlooked and request that this application is refused and a more appropriate proposal that meets all adopted planning policies be submitted.

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