



To:
Mr Christopher Grace - Case Officer
Development and Environment
6th Floor
Bernard Weatherill House
8 Mint Walk
Croydon
CR0 1EA

Email:
Development.management@croydon.gov.uk

From:
Monks Orchard Residents'
Association Planning Officer

5th August 2019
Emails: planning@mo-ra.co
chairman@mo-ra.co
hello@mo-ra.co

Reference:	19/00131/FUL
Application Received:	Thu 10 Jan 2019
Application Validated:	Sun 10 Mar 2019
Address	17 Orchard Avenue Croydon CR0 8UB
Proposal	Revised planning application involving demolition of existing detached house, erection of 3-storey building with further floor of accommodation in roof-space comprising 3 x 1 bedroom flat, 4 x 2-bedroom flats and 1 x 3 bedroom flat, formation of vehicular access and provision of 4 associated parking spaces and refuse storage
Status	Awaiting decision
Case Officer:	Christopher Grace
Consultation Expiry:	Fri 23 Aug 2019
Target Decision:	Sun 05 May 2019

Dear Mr Grace

We are a local Residents' Association, registered with the Croydon Local Planning Authority (LPA), representing approximately 3,800 households in the Shirley North Ward, in the London Borough of Croydon.

We objected to the previous proposed development application and resultant on the amended plans and revised proposal we have updated our objection to reflect the amended drawings and the proposed changes to this development proposal. On behalf of our local residents we object to this amended 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 and acceptable accessibility to present and proposed public Transport**. We only object when proposals do not comply with current adopted or emerging planning policies which are designed to minimise overdevelopment and retain the local character within acceptable constraints. The type face with green background are **current adopted Planning Policies**.

Relevant Planning Policies

London Plan Adopted Policies:

Policy 3.4 Optimising Housing Potential

Policy 3.5 Quality and Design of Housing Developments

Policy 3.6 Play Spaces for Children

Policy 6.11 Smoothing traffic flow and tackling congestion

Policy 6.13 Parking

Emerging Draft New London Plan Policies:

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

Chapter 2 Spatial Development Patterns

Chapter 3 Design

Policy D1 London's form and characteristics

Policy D2 Delivering good design

Policy D4 Housing quality and standards

Policy D5 Accessible housing

Chapter 10 Transport

Policy T6.1 Residential parking

Croydon Local Plan adopted and emerging Planning Policies:

Policy DM10: Design and character

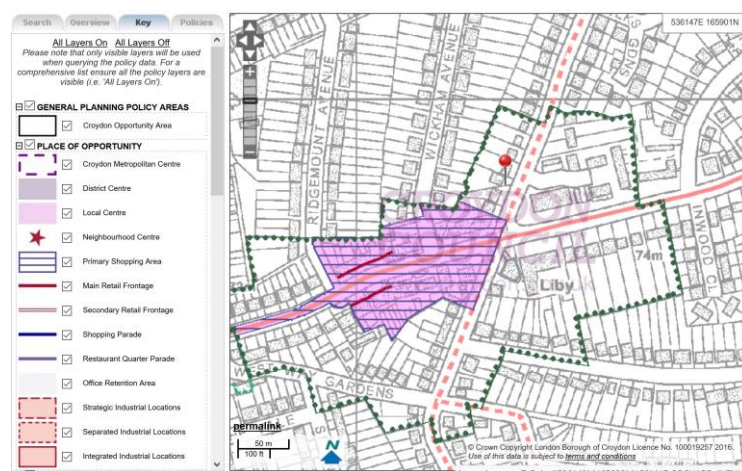
Policy DM13: Refuse and recycling

Policy DM29: Promoting sustainable travel and reducing congestion

Policy DM30: Car and cycle parking in new development

Policy DM45: Shirley (Place Specific Policies).

Supplementary Planning Guidance SPD2 Suburban Residential Developments



The location of 17 Orchard Avenue is within a designated area of “focussed intensification.” The Policy allows further growth which can be accommodated through **more efficient use of infrastructure**. Due to the high availability of community and commercial services, intensification will be supported in and around District, Local and potential Neighbourhood Centres which have **sufficient capacity for growth** and applicable Policies are defined at **DM10.11**.

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

However, Shirley is considered a “**suburban residential area**” outside the **urban shopping parades** as confirmed by Croydon Local Plan “**Shirley Place**” paras and **11.199, 11.200 – Homes**.

11.199 Shirley will continue to be a **suburb** surrounded by substantial green space with improved cycle and pedestrian links. The vibrant Local Centre, with a range of **retailing and independent shops** will continue to serve the local community.

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.

The current status of the emerging Draft London Plan is the “Consolidated changes version– (Clean) dated July 2019 draft replacement **Policy D1A Infrastructure requirements for sustainable densities** and **Policy D1B Optimising site capacity through the design-led approach** (replacing previous draft Policy D6), which should be considered as a proposed replacement policy, including the requirement of defining a new methodology and evaluation criteria to meet the requirements of the new Policy objectives as set out in Draft Policy D1 - London’s form, character and capacity for growth, Policy D2 - Delivering good design, Policy D3 - Inclusive design & Policy D4 - Housing quality and standards and Policy D5 Accessible housing.

(The earlier draft Policy D6 has been subsumed into these policies). See also NPPF para 48.

It is understood that Croydon LPA have not yet prepared to consider the emerging new London Plan Policies for Optimising Housing Potential and it is therefore assumed the current adopted Policy is still the only available policy to determine Residential and Housing Densities as the methodology and evaluation criterion required for the new draft London Plan Policy has not been developed by Croydon LPA which are necessary to implement the new evolving policies.

The new London Plan Policy for Incremental intensification at para **4.2A.1** defines intensification areas within **PTALs 3-6** and within **800m** of a rail station or town centre boundary, and is expected to play an important role in meeting the housing targets for small sites, particularly in Outer London. However, this location is **PTAL 2** and significantly greater than **800m** from the nearest rail station and is therefore considered outside of the requirement for intensification as defined by the New emerging London Plan.

Proposed Development Parameters:

17 Orchard Avenue - Application Amended Drawings - 31st July 2019

Site Area:	710	sq.m
Site Area:	0.071	ha

	Floor	Habitable Rooms (*)	Bedrooms	Bed Spaces	Built-In Storage Space (≈sq.m.) (**)	Table 3.3 Storage (sq.m.)	GIA (sq.m.)	Table 3.3 GIA (sq.m.)	Amenity Space (sq.m.)	DM10.4 c) Private Amenity (sq.m.)
Flat 1	Ground	5	3	5	0.66	2.5	92.0	86	≈52	8
Flat 2	Ground	3	1	2	0	1.5	50.0	50	≈32	5
Flat 3	1st	4	2	3	0	2.0	68.0	61	5	6
Flat 4	1st	4	2	3	0.8	2.0	64.0	61	5	6
Flat 5	2nd	4	2	3	0	2.0	68.0	61	5	6
Flat 6	2nd	4	2	3	0.8	2.0	64.0	61	5	6
Flat 7	3rd	3	1	2	0	1.5	54.0	50	4.5	5
Flat 8	3rd	3	1	2	0.66	1.5	50.0	50	4.5	5
Totals		30	14	23	2.92	15.0	510.0	480	29	47
Average		3.75								

(*) Living/Dining/Kitchen Open Plan = 2 Habitable Rooms

(**) Built in Wardrobes do not count as Built-In Storage Space

Area Designation	Guided intensification associated with enhancement of area's local character									
Setting:	Suburban									
Housing Density:	112.68	u/ha		New London Plan Policy						
Residential Density:	422.54	hr/ha		Post Code				CRO 8UB		
Average hr/unit:	3.75	hr/unit								
Bed Spaces/ha:		bs/ha		Dwellings in Post Code Area:				23	VOA	
PTAL (Base Year):	2			Post Code Area:				1.5	ha (Google Earth)	
PTAL Forecast 2031:	2			Housing Density for Post Code:				15.33	u/ha	
Car Parking:	4			Demolished Dwellings:				1		
Disabled Parking:	1			New Dwellings:				8		
Electric Charging pts:	?			New Dwellings in Post Code:				30		
Parking/person:	0.17	sp/person		New Housing Density for area:				20.00	u/ha	
Communal Open Space:	150	sq.m.		Percentage Increase in Density:				30.46	%	
Open Space/ person:	6.52	sq.m.								

Analysis of proposal against current Adopted Planning Policies

London Plan Policy 3.4 Optimising housing potential

LDF preparation and planning decisions

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

The locality of the proposed development is defined in the **Croydon Local Plan “Shirley Place” DM45.1 as “Suburban”** and within an area designated for **“Focused Intensification”**.

It is outside the **Local Centre Shopping Area** (designations as shown in the Policies Map above). From this information, it is concluded therefore, from the Shirley Place Policies, that this location setting is a **“Suburban”** setting but in close proximity to a **Local Urban Primary Shopping Area**.

The **Residential Density** of the proposed development is **30/0.071 = 422.54hr/ha**. The **PTAL** for the locality is **2** which, for a **suburban setting**, is in the range **150 to 250 hr/ha**.

Assuming the incremental increase within the PTAL and Density Ranges defined in the Density London Plan Policy 3.4 – Density Matrix Table 3.2 are approximately Linear, then the densities should follow the linear graph of:

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

Then for a **Suburban** setting:

$$\text{Residential Density} = 422.54 = \left(\frac{\Delta y}{\Delta x}\right)x - 100 = \left(\frac{350-200}{6-4}\right)x - 100 = \frac{422.54+100}{75} = x = 6.97$$

Which means the PTAL is 6.97 approaching 7 i.e. exceeding the maximum PTAL of 6 when the local PTAL is just 2.

The **Housing Density** of the proposed development is **8/0.071 = 112.68hr/ha**. At an average habitable rooms per Unit of **3.75hr/unit**, the **Housing Density** should be in the range **40 to 80 units/ha** at **PTAL 2** in a “suburban setting” when using: $y = mx + c$

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

$$112.68 = \left(\frac{\Delta y}{\Delta x}\right)x - 40 = \left(\frac{80 - 40}{3 - 2}\right)x - 40 = \frac{112.68 + 40}{40} = x = 3.82 = \text{PTAL}$$

Thus, the PTAL required for Housing Density of **112.68 u/ha** is **3.82** approaching **4** when the actual PTAL is just **2**

This **Residential Density** is more appropriate to an **Urban** Setting at:

$$\text{Residential Density} = 422.54 = \left(\frac{\Delta y}{\Delta x}\right)x - 300 = \left(\frac{350-200}{2-3}\right)x - 100 = \frac{422.54+300}{250} = x = 2.89$$

But even at an “Urban setting the PTAL at 2.89, close on 3 when the actual PTAL is just 2.

For an **Urban Setting**, and a Housing Density of **112.68units/ha** requires a PTAL of:

$$112.68 = \left(\frac{\Delta y}{\Delta x}\right)x - 125 = \left(\frac{145 - 55}{3 - 2}\right)x - 125 = \frac{112.68 + 125}{90} = x = 2.64 = \text{PTAL}$$

A PTAL of **2.64** is required when the actual PTAL is just **2**

We object to this proposal on grounds of significant overdevelopment for the locality if classified as in a “**suburban setting**” at Residential Density of **422.54 hr/ha** and Housing Density of **112.68 units/ha** at average of **3.75units/ha** development So this proposed development is an **OVERDEVELOPMENT** whether considered a setting of **Suburban or Urban** locality.

Similarly, a **Housing Density** of **91.43 u/ha** is totally inappropriate for a locality of PTAL 2 which would actually require a **PTAL of 4.713** – in the highest range **4 to 6**, but the locality has a **PTAL of 2** in the lowest range at a suburban setting. The appropriate ranges for Housing Densities at this setting and **PTAL of 2** with an average of **3.75 hr/u**.

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	(HD = 3.82) 2 to 3	(RD = 6.97) 4 to 6
Suburban	150–200 hr/ha	150 –250 hr/ha	(422.54 hr/ha) 200–350 hr/ha
3.8–4.6 hr/unit	35–55 u/ha	35–65 u/ha	45–90 u/ha
3.1–3.7 hr/unit (3.75hr/Unit)	40–65 u/ha	40 –80 u/ha	55–115 u/ha (112.68 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 (422.54 hr/ha)	200–700 hr/ha
3.8–4.6 hr/unit	35–65 u/ha	45–120 u/ha	45–185 u/ha
3.1–3.7 hr/unit (3.75hr/Unit)	40–80 u/ha	55 –145 u/ha (112.68u/ha)	55–225 u/ha
2.7–3.0 hr/unit	50–95 u/ha	70–170 u/ha	70–260 u/ha

The **appropriate** value for **Residential & Housing Densities** at this “**Suburban setting**” at **PTAL 2** with an average of **3.75 hr/u** are established similarly by: $y = mx + c$

where $m = (\Delta y / \Delta x)$ = slope, y = Residential Density, x = **PTAL 2** and c = y intercept when $x = 0$

$$\text{Then } y = \text{Residential Density} = \left(\frac{\Delta y}{\Delta x}\right)x + c = \left(\frac{200-150}{1-0}\right)2 + 150 \approx \mathbf{183 \text{ hr/ha}}$$

and where $m = (\Delta y / \Delta x)$ = slope, y = Housing Density, x = PTAL 2 and c = y intercept when $x = 0$

$$\text{Then } y = \text{Housing Density} = \left(\frac{\Delta y}{\Delta x}\right)x + c = \left(\frac{65-40}{1-0}\right)2 + 40 \approx \mathbf{56.5 \text{ units/ha}}$$

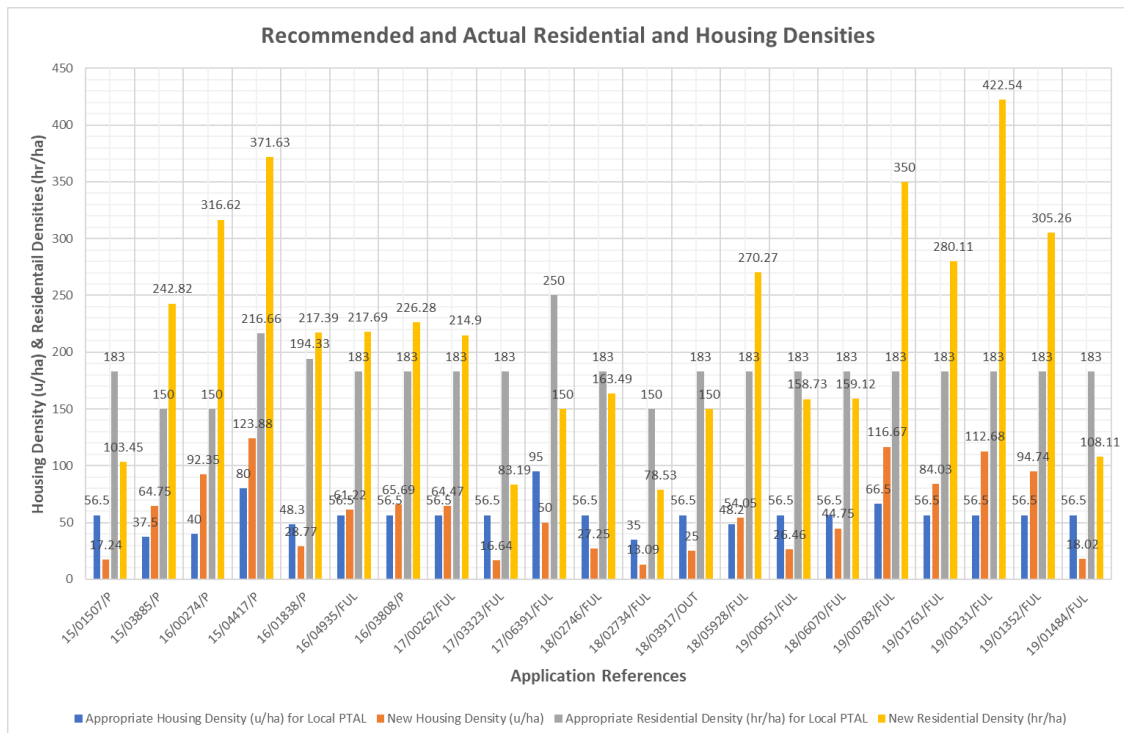


Illustration of appropriate recent in-fill and Redevelopment Residential and Housing Densities and actual Residential and Housing Densities in the MORA Post Code Area

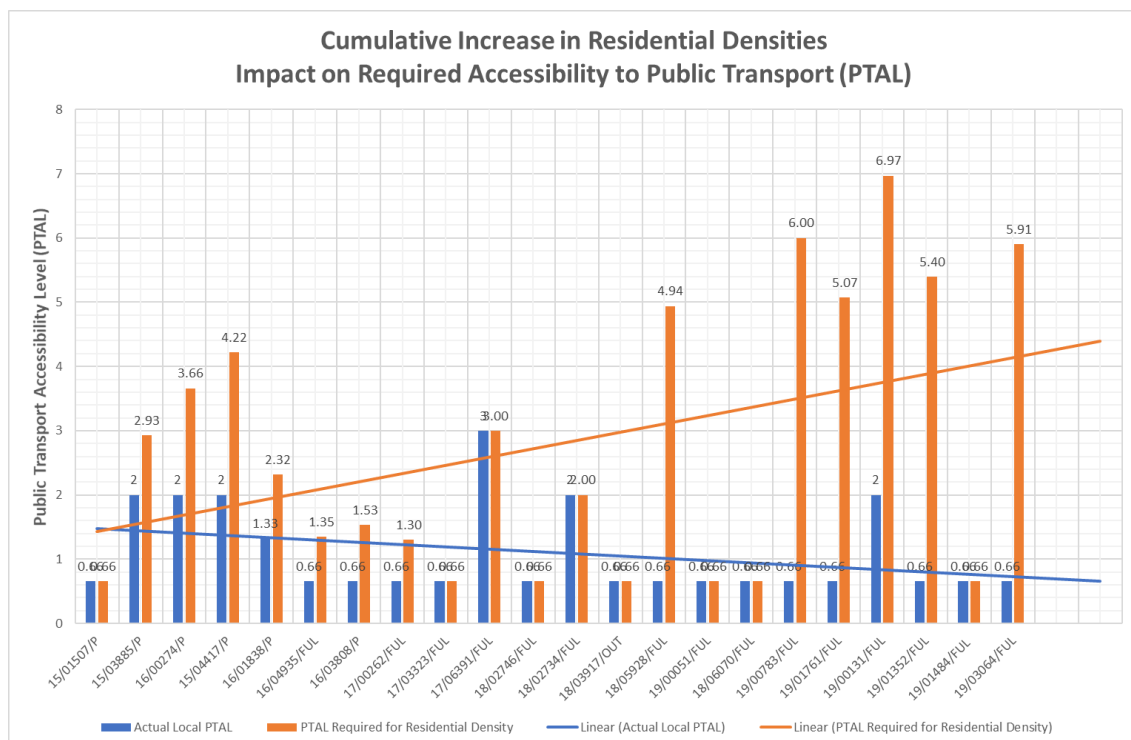


Illustration of excessive PTAL Requirement above the Local available PTAL due to Increased Densities of Applications in the MORA Post Code Area showing the ongoing PTAL linear trend requirement.

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

The Monks Orchard Post Code Area has a single bus route 367 and is a single decker service through a residential area, within a road network which is not suitable for large double decker buses. The passenger carrying capacity is therefore limited and is also infrequent such that the buses get busier at the sites of inappropriate high residential densities, frequently becoming full to capacity as they travel through the residential area and do not stop to pick up further waiting passengers as they proceed. This is exacerbated by some residents having a 15 to 20min walk to the nearest bus-stop. As the service is only 20min intervals at best, these waiting passengers become very frustrated and eventually resort to other means of transport which is likely their personal car which is a significant waste of available road space for only one driver and thus contributes to local traffic congestion.

The Wickham Road (A232) is getting very congested and is approaching severe grid-lock at peak periods and there is little that can be done to remedy this situation becoming worse as the road capacity is nearing its maximum as traffic approaches Addiscombe Road toward central Croydon. The locality has not seen any improvement of infrastructure from Community Infrastructure Levy (CIL) contributions from any recent developments and therefore the 'CIL' collected has not contributed to Shirley Wards locality's lack of services and infrastructure.

We object to this proposed development on grounds of excessive Residential and Housing Density for a **Suburban Setting** as defined in the current adopted **London Plan Policy 3.4 - Optimising Housing Potential, Table 3.2** and **DM45.1 – The Shirley Place** at locality of **PTAL 2** when the Densities would require **PTALs** exceeding the maximum at a numerical value of **6.97**. **There are no other available adopted Policies in the Croydon Local Plan to meet the new NPPF requirements of para 16 d) or Para 122 Achieving appropriate densities.**

London Plan Policy 3.5 Quality and design of housing developments

- A Housing development should be of the highest quality **internally, externally** and in relation to their context and to the wider environment, taking account of strategic policies in this Plan to protect and enhance London's residential environment and attractiveness as a place to live. Boroughs may in their LDFs introduce a presumption against development on back gardens or other private residential gardens where this can be locally justified.

	Beds	Persons	GIA Table 3.3	GIA (sq.m.)	Storage Table 3.3	Storage Offered	Storage Space Deficient	Private Amenity Space	Private Amenity Offered
Flat 1	3	5	86	92	2.5	0.66	1.84	8	≈52
Flat 2	1	2	50	50	1.5	0	1.5	5	≈32
Flat 3	2	3	61	68	2	0	2	6	5
Flat 4	2	3	61	64	2	0.8	1.2	6	5
Flat 5	2	3	61	68	2	0	2	6	5
Flat 6	2	3	61	64	2	0.8	1.2	6	5
Flat 7	1	2	50	54	1.5	0	1.5	5	4.5
Flat 8	1	2	50	50	1.5	0.66	0.84	5	4.5



Table 3.3 - Minimum space standards for new dwellings

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

London Plan Table 3.3 Minimum Space Standards for New Dwellings

Flat 1 of 3b5p has only 0.66m² Built-In Storage but requires 2.5m² Built in Storage
 Flat 2 of 1b2p has zero Built-In Storage but Table 3.3. requires 1.5m² Built in Storage
 Flat 3 of 2b3p has zero Built-In Storage but Table 3.3. requires 2m² Built in Storage
 Flat 4 of 2b3p has Built-In Storage of only 0.8m² but Table 3.3. requires 2m² Built in Storage
 Flat 5 of 2b3p has zero Built in Storage but Table 3.3. requires 2m² Built in Storage
 Flat 6 of 2b3p has Built-In Storage of only 0.8m² but Table 3.3. requires 2m² Built in Storage
 Flat 7 of 1b2p has zero Built in Storage but Table 3.3. requires 1.5m² Built in Storage
 Flat 8 of 1b2p has only 0.66m² Built in Storage but requires 1.5m² Built in Storage

In addition:

Flat 3 with 3 persons has 5m² but the requirement of 5m² for two-person plus 1m² for every additional person thus requiring 6m² Private Amenity space balcony.
 Flat 4 with 3 persons has 5m² but the requirement of 5m² for two-person plus 1m² for every additional person thus requiring 6m² Private Amenity space balcony.
 Flat 5 with 3 persons has 5m² but the requirement of 5m² for two-person plus 1m² for every additional person thus requiring 6m² Private Amenity space balcony.
 Flat 6 with 3 persons has 5m² but the requirement of 5m² for two person plus 1m² for every additional person thus requiring 6m² Private Amenity space balcony.
 Flat 7 with 2 persons has 4.5m² but the requirement of 5m² for two-person Amenity space balcony.
 Flat 8 with 2 persons has 4.5m² but the requirement of 5m² for two-person Amenity space balcony.

We therefore object to this proposed development on grounds of non-compliance to London Plan Policy 3.5 Quality and design of housing developments Table 3.3 Minimum Space Standards for New Dwellings which would be detrimental and unacceptable accommodation standards for the future occupiers of this proposed development for the life of the development.

London Plan Policy 6.11 Smoothing traffic flow and tackling congestion

A The Mayor wishes to see DPDs and Local Implementation Plans (LIPs) take a coordinated approach to **smoothing traffic flow** and **tackling congestion** through implementation of the recommendations of the Roads Task Force report.

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

We object to this proposed development on grounds of inadequate off- street parking at a locality of Red Route restricted parking which will require overspill on-street parking to be a significant distance from the development and cause local congestion along this feeder road which provides the 367-bus route.

London Plan Policy 6.13 Parking

Policy

Strategic

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

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

Planning decisions

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

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

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

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

c meet the minimum cycle parking standards set out in [Table 6.3](#)

d provide for the needs of businesses for delivery and servicing.

The London Plan Policy 6.13 Table 6.2 Residential Parking Standards at Residential Density in the range 159 hr/ha to 250 hr/ha and Housing Density in the range 50 u/ha to 95 u/ha requires up to 1.5 car parking spaces per dwelling which equates to 7.5 spaces. However, there are only 4 car parking spaces provided.

At the appropriate ranges of **Residential & Housing Densities** at this **Suburban Setting** at **PTAL 2** with an average of **3.75 hr/u** at a recommended Residential Density of **150 hr/ha** and



Housing Density of 40 u/ha the **current London Plan Policy 6.13** Recommends up to **1.5 spaces per Unit** thus requiring **12 car parking spaces** for this development proposal.

It is noted that the emerging **Draft New London Plan at Table 10.3** has reduced residential parking at Outer London Boroughs at **PTAL 2** to up to **1 space per dwelling** which would require **8 spaces**. However, this Draft Plan is subject to **Examination in Public (EiP)** by the **Planning Inspectorate** and is unlikely to be adopted until **early 2020**.

There is no legislation to prevent car ownership or to restrict occupants from owning light vans for commercial for business activities which requires local parking overnight. We therefore object to this proposed development on grounds of inadequate parking provision of only **4 bays** with allocation of only **0.17 bays per occupant**, in a locality of **PTAL 2** and at an area of local parking high stress.

RESIDENTIAL CAR PARKING STANDARDS

Table 6.2 Car parking standards

Parking for residential development

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

Maximum residential parking standards

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

Notes:

All developments in areas of good public transport accessibility (in all parts of London) should aim for significantly less than 1 space per unit

Adequate parking spaces for disabled people must be provided preferably on-site³

20 per cent of all spaces must be for electric vehicles with an additional 20 per cent passive provision for electric vehicles in the future.

In outer London areas with low PTAL (generally PTALs 0-1), boroughs should consider higher levels of provision, especially to address 'overspill' parking pressures.

Current Adopted London Plan Policy 6.13 – Residential Parking Standards

We therefore object to this proposed development on grounds of inadequate parking provision in an Urban Shopping Locality of PTAL 3 of only four Parking Bays when the current **London Plan Policy 6.13** requires up to **1.5 space** at **PTAL 2** and at a recommended Residential Density of **450hr/ha** & recommended Housing Density of **120units/ha** which equates to **12 Parking Bays** for **8 dwellings** and should therefore be refused.

Croydon Plan **DM10: Design and Character**

DM10.1 Proposals should be of high quality and, whilst seeking to achieve a minimum height of 3 storeys, should respect:

- a. The development pattern, layout and siting;
- b. **The scale, height, massing, and density;**
- c. The appearance, existing materials and built and natural features of the surrounding area; the Place of Croydon in which it is located.

The council will take into account cumulative impact.

However, The Croydon Local Plan **DOES NOT** provide **any guidance** on the appropriate **scale, massing** or **Densities** for any **designated localities** or **PTAL's** as required of **NPPF 16 d)** and **para 122. Achieving appropriate densities:**

16. Plans should:

- d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;

Achieving appropriate densities

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

- c) the availability and capacity of **infrastructure and services** – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
- d) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and

Therefore, the only guidance on these parameters is the current **London Plan Policy 3.4 – Optimising House Potential** and the Density Matrix at Table 3.2 which we have commented on above.

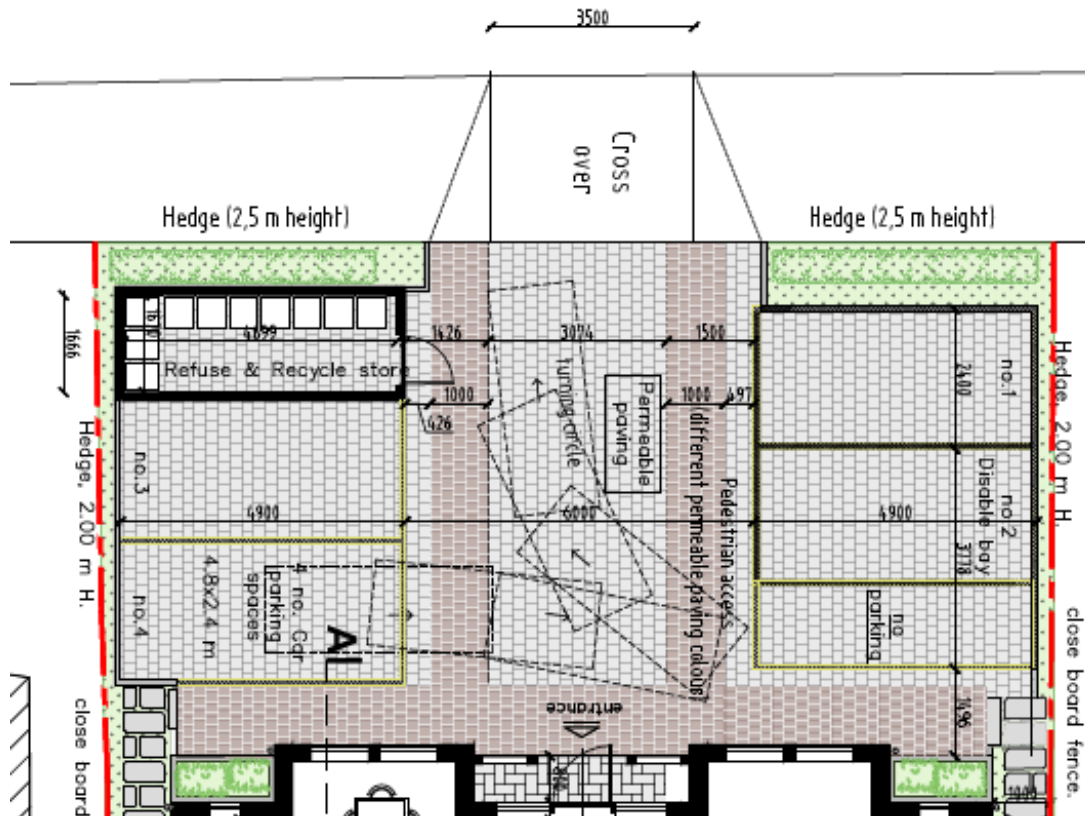
DM10.2 Proposals should create clear, well defined and designed public and private spaces. **The Council will only consider parking within the forecourt of buildings in locations where the forecourt parking would not cause undue harm to the character or setting of the building and where forecourts are 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** of the proposed development which is contrary to **Policy DM10.2** although screened by 2.5m hedging to meet the policy requirement.

The Swept path diagrams illustrate ingress and egress for a vehicle in bay #4 and the use of the no parking zone adjacent to the disabled parking bay #2 for clearance to assist the manoeuvre.



There are no examples of swept paths for bays #1, #2 and #3 which, if entered in a forward gear, if all other bays were full, would be extremely difficult to exit after reversing within the forecourt and to exit the forecourt in a forward gear.



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

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

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.

Our comments relating to accommodation standards are given in response to London Plan Policy 3.5 above which lists the non-compliance to Built-In Storage and Private Amenity Space requirements.

Policy DM10.5 is **deficient in identifying the appropriate area** allocated to “**communal outdoor amenity space**” in that the amount of space per occupant for any proposed development is NOT specified. The actual Communal Open Space is stated as **150m²** which equates to **8.33m²** per person.

Thus, the **Croydon Local Plan Policy** does **NOT** specify the appropriate 'allocation' of "communal outdoor amenity space" and therefore the policy is **NOT deliverable** and NOT complaint to **NPPF para 16**. Without specifying the allocation per occupant, the **Croydon Local Plan** at **DM10.5** does not provide adequate guidance for applicants to meet the policy and the policy does **NOT** meet the guidance required by **NPPF Para 16 d)**.

London Plan Policy 3.6 Play Spaces for Children

Policy

Strategic

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 London Plan interactive spreadsheet, in calculating Play Space for children for 2 x 1 bed plus 2 x 2 bed and 2 x 3 bed Flats, provides a requirement of **8.8m²** Play Space Area required for children of Flatted Developments. This proposed development has no allocated Play Space for Children.

We therefore object to this proposed development on the grounds that there is no allocated Play Space for Children of the future occupants and should therefore be refused.

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

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

SPD2 Chapter 2 – Suburban Residential Development

SPD2 Para 2.11 requires Height of projection of neighbouring properties should be no greater than 45° as measured from the Centre of the closest habitable room on the rear of the neighbouring property. We have used the adjacent rear elevations (and mirror image) using the boundary lines and dropped to the **rear elevation** provided drawings to estimate the 45° Rule to the proposal and have clearly established that the projected 45° line is not clear of the proposed structure and thus fails the Policy by a significant degree.

The Diagram below is the nearest approximation that can be derived using the plans provided but should be confirmed by the case officer before making a recommendation or determination.



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

45° Degree Rule (Elevation)

We object to this proposed development as it clearly fails to meet the design guide requirement of **SPD2 Chapter 2 – Suburban Residential Development** section **2.11c** which requires clearance of the projected 45° Rule from the centre ground floor rear window of adjacent properties. This proposed development fails this 45° Rule for both adjacent properties and therefore this proposal should be refused.

DM10.11 In the locations described in Table 6.3 and shown on the Policies Map as areas of focussed intensification, new development may be significantly larger than existing and should;

- Be up to double the predominant height of buildings in the area
- Take the form of character types "Medium-rise block with associated grounds", "Large buildings with spacing", or "Large buildings with Continuous frontage line"
- Assume a suburban character with spaces between buildings.

Developments in focussed intensification areas should contribute to an increase in density and a gradual change in character. They will be expected to enhance and sensitively respond to existing character by being of high quality and respectful of the existing place in which they would be placed.

However, the Table 6.4 designations of “accommodating growth” are not defined with any parameters, regarding **Scale, Massing and Density** and there is no delineating guidance between designations as required by the New **NPPF para 16 d)**, or **Para 122 Achieving Appropriate Densities**. Also, SPD2 also does not indicate any limits to increased densities so in actual fact there is no policy mechanism to **manage the appropriate density of proposals** other than the current London Plan Policy 3.4 Optimising Housing Density. It is **NOT** clear how this proposal will allow more efficient use of infrastructure or in what respect the locality has sufficient capacity for growth.

We therefore object to this proposed development on grounds of there being no quantifiable definition of **DM10.11** as required by **NPPF para 16 d)** and **NPPF Para 122 Achieving Appropriate Densities** for “**Focussed Intensification**” to allow most efficient use of available infrastructure or capacity for growth, resulting in an overdevelopment as defined by the **London Plan Policy 3.4 Table 3.2** and non-compliant to the definition of “**incremental Intensification**” as defined in the New Draft emerging **London Plan Policy** for “**Incremental intensification**” at **para 4.2A.1** which defines Incremental intensification areas to be within **PTALs 3-6** and within **800m of a rail station or town centre boundary**, of which this location is at **PTAL 2** and is way over **800m** of any rail station and should therefore 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**.

The Council Refuse & Recycling guidance included at:

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

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

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

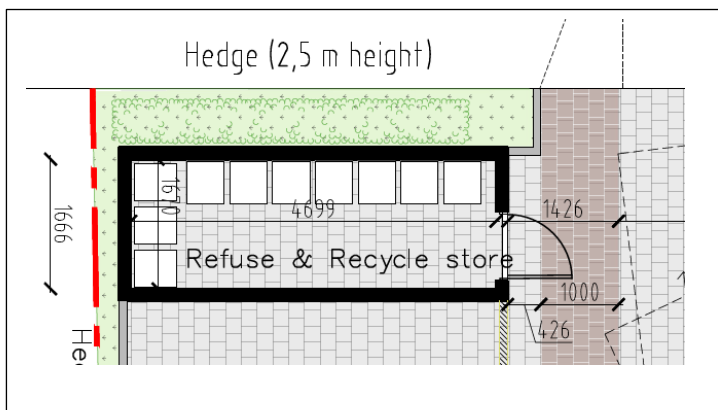
Para 4.2 of the Guidance states:

4.2 Internal Storage To enable and encourage occupants of new residential units to recycle their waste, developers should provide adequate internal storage, usually within the kitchen, for the separation of

recyclable materials from other waste. It is recommended that developers consider methods to integrate the reusable sacks and 9ltr caddies for recycling into the design of the kitchen areas to enable and encourage residents to make full use of them.

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

It is understood that there must be a minimum of **150mm clearance** around and between each bin within a storage area. Where there is more than **one bin** within a storage area, there must be **2m clearance in front of each bin** to enable it to be accessed and safely moved without needing to move any of the other containers. The proposed development provides 1m clearance in front on the bins and does not provide required **2m clearance** in front of the bins to allow safe movement as the total depth is only **1.666m** in total which includes the depth of the bins.



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

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

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

Policy DM29: Promoting sustainable travel and reducing congestion

To promote sustainable growth in Croydon and reduce the impact of traffic congestion development should:

- Promote measures to increase the use of public transport, cycling and walking;
- Have a positive impact and must not have a detrimental impact on highway safety for pedestrians, cyclists, public transport users and private vehicles; and
- 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.

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

The Ward is served by a single decker **367 Bus Route** from West Croydon to/from Bromley via Shirley Oaks Village. This Bus Route is becoming heavily congested at peak times and the increase in Residential Densities resultant from cumulative piecemeal developments is causing local passenger frustration. An additional **Bus Service 689** has been introduced to serve local schools, specifically for the school run and specifically for school children as the **367** single decker could not cope during the school run congestion period.

The 367 Buses vary between 20min and 30min intervals depending on time of day and capacity.

Location	Reference	Date of approval	Existing Dwellings	Approx Existing Occupants	New Proposed Dwellings	Habitable Rooms (hr)	New Bed Spaces or Occupants	Additional Occupants	Site Area (ha)	Average Habitable Rooms per Unit (Avg hr/u)	Appropriate Housing Density (u/ha) for Local PTAL	Appropriate Residential Density (hr/ha) for Local PTAL	New Housing Density (u/ha)	New Residential Density (hr/ha)	PTAL Required for Residential Density	Actual Local PTAL	Residential Density (bs/ha)*	Car Parking	Car Parking per Occupant
64 Woodmere Ave	15/01507/P	10/07/2015	1	4	5	30	26	22	0.29	6	56.5	183	17.24	103.45	0.66	1a = 0.66	89.66	14	0.5385
40 Orchard Ave	15/03883/P	10/11/2015	1	2	8	30	24	22	0.1236	3.75	37.5	150	64.75	242.82	2.93	2	194.25	9	0.375
393 Wickham Road	16/00274/P	04/08/2016	1	5	7	24	21	17	0.0758	3.43	40	150	92.35	316.66	3.66	2	290.24	7	0.3182
263 Wickham Road	15/04417/P	16/08/2016	1	5	8	24	24	19	0.0646	3	80	216.66	123.88	371.63	4.23	2	371.63	9	0.38
68-70 Orchard Ave	16/01838/P	07/09/2016	2	4	9	68	64	60	0.3128	7.56	48.3	194.33	28.77	217.39	2.32	1b = 1.33	204.6	18	0.28
41-43 Orchard Way	16/04935/FUL	20/01/2017	2	4	9	32	32	28	0.147	3.56	56.5	183	61.22	217.69	1.35	1a = 0.66	217.69	9	0.28
98-100 Orchard Way	16/03808/P	27/02/2017	2	4	9	31	34	30	0.137	3.44	56.5	183	65.69	226.28	1.53	1a = 0.66	248.18	9	0.26
8-10 The Glade	17/00262/FUL	27/04/2017	2	4	9	30	30	26	0.1396	3.33	56.5	183	64.47	214.9	1.30	1a = 0.66	214.9	9	0.30
33 Orchard Way	17/03323/FUL	17/01/2018	0	0	1	5	5	5	0.0601	5	56.5	183	16.64	83.19	0.66	1a = 0.66	83.19	2	0.40
151 Wickham Road	17/06391/FUL	23/02/2018	0	0	1	3	4	4	0.02	3	95	250	50	150	3.00	3	200	0	0.00
2-4 Woodmere Close	18/02746/FUL	09/08/2018	0	2	1	6	5	3	0.0367	6	56.5	183	27.25	163.49	0.66	1a = 0.66	136.24	10	2.00
48 Wickham Avenue	18/02734/FUL	21/09/2018	0	0	1	6	5	5	0.0764	6	35	150	13.09	78.53	2.00	2	65.45	1	0.20
6-8 Woodmere Close	18/03917/OUT	26/10/2018	0	0	1	6	6	6	0.04	6	56.5	183	25	150	0.66	1a = 0.66	150	4	0.67
20-22 The Glade	18/05928/FUL	01/02/2019	0	0	2	10	12	12	0.037	5	48.2	183	54.05	270.27	4.94	1a = 0.66	324.32	4	0.33
10-12 Woodmere Close	19/00051/FUL	27/02/2019	0	0	1	6	6	6	0.0378	6	56.5	183	26.46	158.73	0.66	1a = 0.66	158.73	4	0.67
9a Orchard Rise	18/06070/FUL	21/03/2019	1	0	9	32	41	41	0.2011	3.56	56.5	183	44.75	159.12	0.66	1a = 0.66	203.88	12	0.29
32 Woodmere Avenue	19/00783/FUL	20/06/2019	1	4	7	21	20	17	0.06	3	66.5	183	116.67	350	6.00	1a = 0.66	333.33	5	0.25
18a Fairhaven Avenue	19/01761/FUL	20/06/2019	1	Not Known	9	30	33	Not Known	0.1071	3.33	56.5	183	84.03	280.11	5.07	1a = 0.66	308.12	9	0.27
17 Orchard Avenue	19/00131/FUL		1	Not Known	8	30	23	Not Known	0.071	3	56.5	183	112.68	422.54	6.97	2	253.52	4	0.17
56 Woodmere Avenue	19/01352/FUL		1	Not Known	9	29	32	Not Known	0.095	3.22	56.5	183	94.74	305.26	5.40	1a = 0.66	336.84	6	0.19
14-16 Woodmere Close	19/01484/FUL		0	0	1	6	5	5	0.0555	6	56.5	183	18.02	108.11	0.66	1a = 0.66	90.09	2	0.40
37 Woodmere Avenue	19/03064/FUL		1	Not Known	8	30	26	Not Known	0.0875	3.75	56.5	183	91.43	342.86	5.91	1a = 0.66	297.14	8	0.31
Total			18	38	123	489	479	328	2.2756		1241.50	4038.99	1201.75	4932.99	61.215		4474.86	155	8.58

Recent in-fill and Redevelopments in the MORA Post Code Area

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

Policy DM30: Car and cycle parking in new development

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

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

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

As detailed under London Plan Policy 6.13 we reiterate our objection on grounds of **Policy DM30** objecting to this proposed development on grounds of inadequate parking provision in an Urban Shopping Locality of **PTAL 2** of only **four Parking Bays** when the current **London Plan Policy 6.13** requires up to **1.5** space at **PTAL 2** and at a recommended Residential Density of **450hr/ha** & recommended Housing Density of **120units/ha** which equates to **12** Parking Bays for **8** dwellings and should therefore be refused.

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 residential occupancy of 380 persons resulting from in-fill and redevelopment and therefore the policy **Shirley Place Transport para 11.205 has NOT been fulfilled**

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

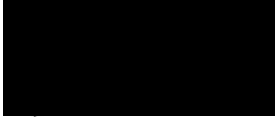
Please inform us of your recommended decision in due course.



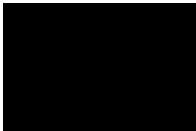
Please register our comment as:

Monks Orchard Residents' Association (Objects) on the comments tab of the LPA online public register.

Yours sincerely



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



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

Cc:

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

Bcc:

MORA Executive Committee	
Trevor Ashby	Chair of Shirley Planning Forum
Spring Park Residents' Association	
Local effected Residents	
Cllr. Scott Roche	Shirley South Councillor
Cllr. Jason Cummings	Shirley South Councillor