

To: Mr Dean Gibson – Case Officer Development Management Bernard Weatherill House 8 Mint Walk Croydon CR0 1EA
 www.mo-ra.co
 f mo-ra.co/facebook

 hello@mo-ra.co
 mo-ra.co/twitter

From: Monks Orchard Residents' Association (Planning)

2nd August 2019

Emails: <u>dmcomments@croydon.gov.uk</u> <u>Development.management@croydon.gov.uk</u>

<u>planning@mo-ra.co</u>
<u>chairman@mo-ra.co</u>
<u>hello@mo-ra.co</u>

Reference:	19/03279/FUL
Application Received:	Fri 12 Jul 2019
Application Validated:	Fri 12 Jul 2019
Address:	Land R/O The Shirley Inn Public House 158 Wickham Road
	Croydon CR0 8BF
Proposal:	Erection of a residential development of two detached three storey buildings comprising a total of 6 flats (2x1bed, 2x2bed, 2x3bed), provision of refuse and cycle storage, hard and soft landscaping and provision of two parking spaces.
Status:	Awaiting decision
Case Officer:	Dean Gibson
Consultation Close:	Sun 11 Aug 2019
Target Decision Date:	Fri 06 Sep 2019

Dear Mr Gibson

The Monks Orchard Residents' Association represents approximately 3,800 residential Households in the Shirley North Ward of the LB of Croydon.

We offer the following objection comments to the above mention development proposal on the following grounds.

Relevant Planning Policies:

London Plan Policy 3.4 Optimising Housing Potential London Plan Policy 3.5 Quality and Design of Housing Developments London Plan Policy 3.6 Children and young people's play and informal recreation London Plan Policy 6.13 Parking Croydon Local Plan Policy DM10: Design and character Policy DM13: Refuse and Recycling Waste and Recycling in Planning Policy Document August 2015 -Edited October 2018 Croydon Local Plan Policy DM45: Shirley (Place Specific Policies).

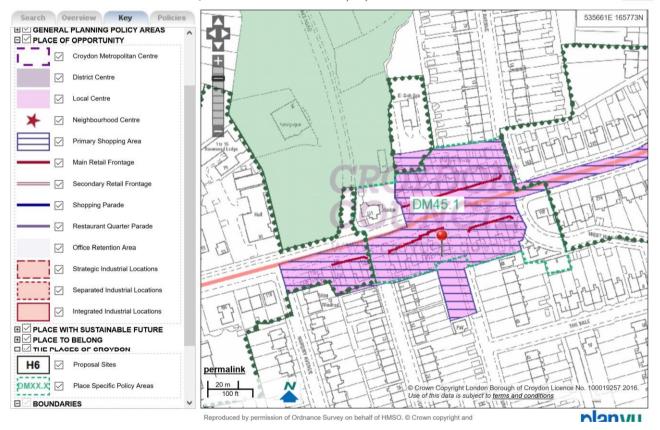
Croydon Local Plan Policy DM45.1: Shirley Local Centre





Site +A3:M24Area	522	sq.m.										
Site +A3:M24Area	0.0522	ha										
Intensification Area	No											
Suburban/Urban	Urban	DM45.1										
	Floor	Habitable Rooms (*)	Bedroom	Bed Spaces	GIA Provided	GIA Table 3.3	Storage Provided	Storage Table 3.3	Amenity Provided	Amenity Table 3.3	Communal Garden	Parking
Apartment 1	Grnd	4	2	4	70	70	2.6	2	46	7		1
Apartment 2	1st	3	1	2	55	50	1.7	1.5	5	5		0
Apartment 3	1st	1			105	93			4.6	8		0
Duplex	2nd	4	3	5	105	33	3.7	2.5	10	0	85	0
Apartment 4	Grnd	4	2	4	70	70	2.6	2	52	7	65	1
Apartment 5	1st	3	1	2	55	50	1.7	1.5	5	5		0
Apartment 6	1st	1			105	93			4.6	8		0
Duplex	2nd	4	3	5	105	95	3.7	2.5	10	0		0
Total		24	12	22	460	426	16	12	137.2	40	85	2
(*) Living/Dining/Kitch	ien - open p	lan = 2 Hab	itable Roon	าร								
Housing Density	114.94	u/ba										
		-										
Residential Density	459.77	nr/na										
PTAL (Base)	3											
PTAL 2031	3											
Parking Provision		spaces/occ	upant									
Average hr/u	4	hr/u										

The Interactive Policies Map for this location is:



The locality of 158 Wickham Road – The Shirley Inn & Pub is NOT included in the "Local Intensification Area" in the Shirley Local Centre but is in a primary shopping area as is clearly shown on the above Policies Map.





London Plan Policy 3.4 – Optimising Housing Potential

If the Open Plan Living/Dining/Kitchen accommodation is considered as 2 habitable rooms, the **Residential Density** of the proposed development is **24/0.0522 = 459.77hr/ha**. The PTAL for the locality is **3.** The Residential Density range recommended for an **Urban Setting** at **PTAL 3** is between **200 to 450hr/ha**. However, the proposed development has **Residential Density** of **459.77hr/ha** which is in the **very highest range** of **PTAL 4 to 6** which would be appropriate for **Residential Densities in the range 200 to 700hr/ha**.

Assuming the incremental **PTAL** and **Residential Densities** over the ranges recommended are approximately linear, then the PTAL at **Residential Density** of 459.77 hr/ha should follow the linear 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, 459.77 = $\left(\frac{\Delta y}{\Delta x}\right)x - 800 = \left(\frac{700 - 200}{6 - 4}\right)x - 800 = \frac{459.77 + 800}{250} = x = 5.04 = PTAL$

When the actual PTAL for this locality is just 3

In addition, assuming the incremental PTAL and Housing Density ranges are approximately linear over the ranges, the Housing Density at 6/0.0522 u/ha = 114.94u/ha with an average habitable rooms per unit of 24/6 = 4.0hr/u requires a PTAL to be in the range of 45 to 120u/ha when the actual PTAL is 3 can equally be shown by the formula: y = mx + c

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

Then, 114.94 = $\left(\frac{\Delta y}{\Delta x}\right)x - 105 = \left(\frac{120 - 45}{3 - 2}\right)x - 50 = \frac{114.94 + 105}{75} = x = 2.93 = PTAL$

Which is an appropriate Housing Density for this urban locality at PTAL 3

If the PTAL between 2 and 3 is assumed linear then it can be shown above at an extract from the London Plan Density Matrix Table 3.2 at a **urban setting** to illustrate that the **Residential Density** of the proposed development is **totally inappropriate at 457.77hr/ha** for the locality which has a **PTAL** of **3** when it **actually requires a PTAL of 5.04** in the ranges 4 to 6 shown on Table 3.2.

The appropriate value for Residential & Housing Densities at this setting at PTAL 3 with an average of 4.0 hr/u are established similarly by: y = mx + c

where m= $(\Delta y/\Delta x)$ = slope, y = Residential Density, x = **PTAL 3** and c = y intercept when x = 0 Then y = **Residential Density** = $\left(\frac{Ay}{Ax}\right)x + c = \left(\frac{450-200}{3-2}\right)3.0 - 300 = 450$ hr/ha

and where m= $(\Delta y / \Delta x)$ = slope, y = Housing Density, x = PTAL 3 and c = y intercept when x = 0 Then $y = Housing Density = \left(\frac{\Delta y}{\Delta x}\right)x + c = \left(\frac{120-45}{3-2}\right)3.0 - 105 = 120$ units/ha

This gives clear proof of validity of the assumptions and maths used in the above calculations which equate exactly to the values at **PTAL 3** in Table 3.2 below (shown in **Blue**).





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)				
	0 to 1	2 to 3 (HD 2.93)	4 to 6 (RD 5.04)				
Urban	150–250 hr/ha	200 –450 hr/ha	200–700 hr/ha (459.77hr/ha)				
3.8 –4.6 hr/unit (4hr/u)	35–65 u/ha	45– 120 u/ha (114.94u/ha)	45–185 u/ha				
3.1-3.7 hr/unit	40–80 u/ha	55–145 u/ha	55–225 u/ha				
2.7-3.0 hr/unit	50–95 u/ha	70–170 u/ha	70–260 u/ha				

Policy 3.4 Optimising housing potential is the current adopted London Plan

And the Policy States:

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.**

As the applicant has NOT provided any justification or substantive reason for NOT meeting this policy definition as detailed in the London Plan SPG Housing (2016) paras 1.3.50 to 1.3.55:

We therefore object to this proposal on grounds of failure to meet the objectives of London Plan Policy 3.4 – Optimising Housing Potential. Table 3.2 in relation to an Excessive Residential Density of 459.77 hr/ha requiring a local PTAL of 5.031 when the actual is PTAL 3 and forecast to remain at PTAL 3 until 2031 and therefore this development proposal should be refused. There are no other available adopted Policies in the Croydon Local Plan to meet NPPF para 16 d) or Para 122 Achieving appropriate densities.

Policy 3.5 Quality and Design of Housing Developments Minimum Space Standards Table 3.3.

Fully Compliant





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 2×1 bed plus 2×2 bed and 2×3 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.

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 <u>Table 6.2</u> in the Parking Addendum to this chapter **should be the basis for considering planning applications** (also see Policy <u>2.8</u>), 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 proposed development locality has PTAL of 3 at base year and is forecast to remain at PTAL 3 until at least 2031.

The possible car ownership for this proposed development is set out below:





	Occupants	Possible Vehicle Ownership
2b4p	4	2
1b2p	2	1
3b5p	5	2
2b4p	4	2
1b2p	2	1
3b5p	5	2
	22	10
	1b2p 3b5p 2b4p 1b2p	2b4p 4 1b2p 2 3b5p 5 2b4p 4 1b2p 2 3b5p 5 3b5p 5 3b5p 5

The Car parking allocation per dwelling is NOT a sensible or realistic measure of car ownership as dwellings don't drive cars but their occupants do. It is therefore unacceptable to have a parking allocation of just 2 spaces for 22 occupants giving a parking allocation of 0.09 per occupant.

Vehicle could include commercial vehicle for business See:

https://www.ons.gov.uk/peoplepopulationandcommunity/personalandhouseholdfinances/expenditur e/datasets/percentageofhouseholdswithcarsbyincomegrouptenureandhouseholdcompositionuktabl ea47

RESIDENTIAL CAR PARKING STANDARDS

Table 6.2 Car parking standards

	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		35-65 u/ha		45-90 u/ha		
3.1-3.7 hr/unit	40-65 u/ha	Up to 2 spaces per unit	40-90 u/ha	Up to 1.5 spaces per unit	55-115 u/ha	Up to one space per unit	
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	40-90 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	And in case of the local division of the loc	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/hr	Up to one space per unit	100-240 u/ha		215-405 u/ha		
Maximum resi	dential parking	g standards					
number of bec	imber of beds		4 or more		3	1-	
parking spaces u			p to 2 per unit	up to 1.5	per unit	less than 1 per un	
space per unit		od public transport a	e provided pref	erably on-site ³		ignificantly less than r electric vehicles in	

At the <u>appropriate</u> ranges of Residential & Housing Densities at this Urban Setting at PTAL 3 with an average of 4.0hr/u at Residential Density 450hr/ha and Housing Density of 120 u/ha the <u>current London Plan Policy 6.13</u> Recommends up to 1.5 spaces per Unit thus requiring 9





car parking spaces for this development proposal. This does not include any **commercial vehicles** owned by a resident for their employment or business activities.

The Overspill car parking would be either in **Spring Park Road**, **Barmouth Road** which has significant parking stress as dwellings have no parking facilities and therefore use all available on-street parking available or "the Vale" which already suffers parking stress from local residents and shoppers.

It is noted that the emerging **Draft New London Plan at Table 10.3** has reduced residential parking at Outer London Boroughs at **PTAL 3** to up to **0.75** spaces per dwelling which would require **4.5 bays** (rounded 5 actual) for **6** dwellings. 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 **2 bays** with allocation of only **0.09 bays per occupant**, in a locality of **PTAL 3** and at an area of local parking medium stress.

We therefore object to this proposed development on grounds of inadequate parking provision in an Urban Shopping Locality of PTAL 3 of only two Parking Bays when the current **London Plan Policy 6.13** requires up to **1.5** space at **PTAL 3** and at a recommended Residential Density of **450hr/ha** & recommended Housing Density of **120units/ha** which equates to **9** Parking Bays for **6** dwellings and should therefore be refused.

Croydon Local Plan 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:

- 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.

Where an extension or alteration is proposed, adherence to Supplementary Planning Document 2 Residential Extensions and Alterations or equivalent will be encouraged to aid compliance with the policies contained in the Local Plan.

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

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.

The proposed development is in the grounds of an existing building which is retained but is clearly **NOT subservient** to that building in terms of its height, mass and footprint.



We therefore object to this proposed development on the grounds that it does not meet the Croydon Local Plan **Policy DM10.1** in that this development is in the grounds of an existing building which is retained and shall be **subservient** to that building, and this proposed development is clearly **NOT subservient** to the Shirley Inn & Pub building as shown above and should therefore be refused.

DM10.2 Proposals should create clear, well defined and designed public and private spaces. The Council will only consider parking within the forecourt of buildings in locations where the forecourt parking would not cause undue harm to the character or setting of the building and where forecourts are large enough to accommodate parking and sufficient screening without the vehicle encroaching on the public highway. The Council will support proposals that incorporate cycle parking within the building envelope, in a safe, secure, convenient and well-lit location. Failing that, the council will require cycle parking to be located within safe, secure, well lit and conveniently located weather-proof shelters unobtrusively located within the setting of the building.

We object to the two car parking bays facing Spring Park Road which do not have adequate **vision splays** for the safeguard of pedestrians and are not screened and do not meet **Policy DM10.2**.

If entered in a forward gear, there would be no method of exiting safely. This proposed development should therefore be refused.





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 $5m^2$ per 1-2 person unit and an extra $1m^2$ per extra occupant thereafter;

e. In the case of development in the grounds of an existing building which is retained, a minimum length of 10m and no less than half or 200m² (whichever is the smaller) of the existing garden area is retained for the host property, after the subdivision of the garden.

Adherence with Supplementary Planning Document No.3: Designing for Community Safety or equivalent will be encouraged to aid compliance with the policies contained with the Local Plan.

Therefore we object to this proposed development on grounds of non-compliance to **Policy DM10.4 e)** which applies as this proposed development is in the grounds of an existing building which is retained and therefore requires that a minimum length of **10m** and no less that **200m**² (whichever is the smaller) of the existing area shall be retained for the host property after subdivision – and clearly these distance and areas are not afforded to the host property after subdivision and thus this proposed development should therefore be refused.

DM10.5 In addition to the provision of private amenity space, proposals for new flatted development and major housing schemes will also need to incorporate high quality communal outdoor amenity space that is designed to be flexible, multifunctional, accessible and inclusive.

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.

6.56 The London Housing Design Guide in 5.1.1 Standards – identified that 'in the past, planning guidance for privacy has been concerned with achieving visual separation between dwellings by setting a minimum distance of 18-21m between facing homes'. It says that 'these are still useful yardsticks for visual privacy, but adhering rigidly to these measures can limit the variety of urban spaces and housing types in the city, and can sometimes unnecessarily restrict density'.

6.71 The Council considers the health and wellbeing of those living and working within the borough to be of the upmost importance. New developments can impact upon the amenity of the occupants of neighbouring properties. Site layouts should be designed to protect or improve conditions for occupants of nearby properties and future occupants. In line with the Housing Supplementary Planning Guidance, when assessing site layouts, the Council will consider a development's impact on visual amenity, **overlooking**, outlook, and sunlight and daylight.





6.81 Designers should consider the position and aspect of habitable rooms, gardens and balconies, and avoid windows facing each other where privacy distances are tight. Planning guidance has, in the past, been concerned with achieving visual separation between dwellings by setting a minimum distance of **18-21m** between facing homes (between habitable room and habitable room as opposed to between balconies or terraces or between habitable rooms and balconies/terrace).



Rear Elevation overlooking Barmouth Road Gardens and Properties

We object to this proposed development on grounds of **direct overlooking** into gardens and properties of Barmouth Road as the rear windows of the proposed development are overlooking the gardens and properties of **Barmouth Road** at a distance of approximately **19m** which less than the minimum 18 to **21m** between facing windows of habitable rooms. Although this is an absurd parameter, as a minimum distance cannot have a tolerance, we can assume the minimum distance between these facing windows of habitable rooms at **~19m** is less than **21m** and therefore this proposed development fails this requirement on overlooking and should therefore be refused.

DM10.9 To ensure a creative, sensitive and sustainable approach is taken to incorporating architectural lighting on the exterior of buildings and public spaces the Council will require proposals to:

- a. Respect enhance and strengthen local character;
- b. Seek opportunities to enhance and emphasise the key features of heritage assets and local landmark buildings; or seek to encourage the use of public spaces and make them feel safer by incorporating lighting within public spaces; and
- c. Ensure lighting schemes do not cause glare and light pollution.
- d. Adherence with Croydon's Public Realm Design Guide, or equivalent, will be encouraged to aid compliance with the policies contained in the Local Plan.

We object to this proposed development on grounds that it fails to meet the objectives of **Policy DM10.9 a) & b)** in that the proposed development does NOT respect or enhance the local character specifically the architecture of the host Shirley Inn and Public House or the key features of heritage of the host building and character of surrounding dwellings all which have pitched roofs which clearly clashes with the flat roofs of the proposed two blocks of flats.





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

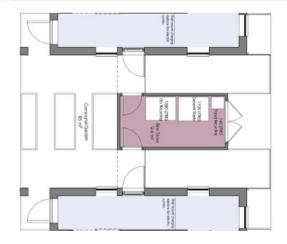
d. Provide layouts that ensure facilities are safe, conveniently located and easily accessible by occupants, operatives and their vehicles.

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.

Waste and Recycling in Planning Policy Document August 2015Edited October 2018Produced by LBC Waste Management TeamSection 4 - Flats with 5 or more units4.4 External Storage – Bins4.6 External Storage – Dimensions

There must be a minimum of **150mm clearance** around and between each bin within a storage area. Where there is more than one bin within a storage area, there must be **2m clearance in front of each bin** to enable it to be accessed and safely moved without needing to move any of the other containers.

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







We object to this proposed development on grounds that the proposed development Bin Storage does not show **150mm clearance** between each Bin and the clearance from the front of each Bin requirement of 2m is not provided. This measurement is **1.1m** as measured on the supplied ground floor plan (at magnification 112% provides scale of 1 cm = 1 m). This fails the requirement of a clearance to the front of Bins of 2m within the Bin store.

Croydon Local Plan Policy DM45: Shirley (Place Specific Policies). Croydon Local Plan Policy DM45.1: Shirley Local Centre

As Policy DM45.2 is the area between 518 and 568 Wickham Road, and is referenced as a 'Suburban Shopping Area' character type and DM45 and as there is only one Suburban Shopping Area, therefore DM45.1 must be designated an Urban Shopping Area as clarification of the local designation.

The proposed development is NOT within a designated Intensification Area but the within the designated Shirley Place Policy DM45.1

General Character

11.206 Shirley is predominantly a **suburban residential** settlement surrounded by natural areas of Green Belt. This place is defined by the tree lined streets, the regular rhythm of well-spaced buildings with well-kept landscaped areas to the front, that allow oblique long-range views beyond the rear gardens.

11.207 Shirley's residential character predominantly consists of 'Planned Estates of Semi-Detached Houses' with garages and 'Compact Houses on Relatively Small Plots' set in large green spaces. This combination creates an open varied and interesting skyline and roofscape. The southern part is dominated by 'Scattered Houses On Large Plots' surrounded by expansive areas of greenery, including woodland of Addington Hills.

11.208 Shirley has **three urban** and **one suburban shopping** area characters along Wickham and Shirley Roads. The suburban feel of these shopping areas are strengthened by tree lined streets, green verges with planting and small green spaces and parking accommodated in slip roads. These features play a vital role in creating Shirley's sense of place.

DM45.1 Within Shirley Local Centre, to retain the unique qualities development should:

a. Retain the continuity of ground floor active frontages and allow flexibility at first floor and above for mixed use;

b. Reference, respect and enhance architectural features such as the consistent rhythm and articulation of fenestration and retain features such as the triangular bay windows;

c. Complement the existing predominant building heights of 2 storeys up to a maximum of 4 storeys; and

d. Incorporate or retain traditional shop front elements such as fascia's, pilasters and stall risers.







Front Elevations facing Spring Park Road

We object to this proposed development on the grounds that the proposal does **NOT** respect or enhance the architectural features of surrounding buildings and dwellings all of which have pitched roofs. The proposed building will dominate the street scene with a cluttered facia which does not blend with the surrounding rhythm of buildings or balance the architectural qualities of the Shirley Inn or the local dwellings.

Design Comments

The only access to the Private Amenity Space Balconies for **Flat 3 and 6** is via a bedroom which is most inappropriate and inconvenient and considered an extremely bad design. Access to a balcony should be from living or lounge area accommodation and should not need to inconvenience other occupants in the privacy of their own bedrooms, for access to private amenity space.



We object to this proposed development on the aforementioned grounds and non-compliance to planning policies and any that we may 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** <u>planning@mo-ra.co</u> 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.

Croydon Central

Head of Development Management (LPA)

Shirley North Ward Councillor Shirley North Ward Councillor

Shirley North Ward Councillor Shirley South Ward Councillors

Shirley South Councillor

Cc: Sarah Jones MP Mr. Pete Smith Cllr. Sue Bennet Cllr. Richard Chatterjee Cllr. Gareth Streeter Cllr. Jason Cummings Cllr Scott Roche

Bcc:

MORA Executive Committee SPRA Planning Committee & President Local Residents & Interested Parties