



To: Case Officer – Mr George Clarke
Development Environment
Development Management
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From:
Monks Orchard Residents' Association
Planning

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17th September 2019
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| | |
|-------------------------------|--|
| Reference: | 19/01352/FUL |
| Application Received: | Wed 20 Mar 2019 |
| Application Validated: | Wed 20 Mar 2019 |
| Address: | 56 Woodmere Avenue Croydon CR0 7PD |
| Proposal: | Demolition of a single-family dwelling and erection of a 3- storey block containing 2 x 3-bedroom and 7 x 2-bedroom apartments with associated access, 9 parking spaces, cycle storage and refuse store (amended plans and description) |
| Consultation Close: | Wed 25 Sep 2019 |
| New Target Date: | TBA |
| Case Officer: | George Clarke |

Dear Mr Clarke

Resultant on the provision and notification of further amended drawings Dated 9th September 2019, we have revised and updated our objection letter to take account of these changes to this development proposal. Consultation has been extended to 25th September. It is noted that the footprint of the proposal remains exactly the same and only the internal configuration and roof form have been modified to improve compliance to **London Plan Policy 3.5 – Minimum Space Standards**. The main issue of **excessive and inappropriate Residential and Housing Densities** has been exacerbated and remains a significant **non-compliance** and reason for objection and **refusal** of this proposal.

The Monks Orchard Residents' Association (MORA) represents 3,897 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).

We fully appreciate and understand the need for additional housing and we only object to proposals that do **not comply** with current adopted planning policies which are designed to ensure acceptable accommodation standards for future occupants, are within acceptable **Residential and Housing Densities** appropriate for the locality and respect the local character within acceptable constraints. On behalf of our members and local residents we continue to **object** to the above-mentioned planning application development proposal on the following grounds and request that a **more appropriate and compliant** proposal be submitted by the applicant.

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 Children and young people's play and informal recreation facilities

Policy 6.11 Smoothing traffic flow and tackling congestion

Policy 6.13 Parking

Croydon Local Plan adopted Policies:

Policy DM10: Design and character

Policy DM13: Refuse and recycling

Policy DM29: Promoting sustainable travel and reducing congestion

Policy DM30: Car and cycle parking in new development

Policy DM45: Shirley (Place Specific Policies).

SPD2 – Suburban Residential Developments

Analysis of amended proposal 9th September against current Adopted Planning Policies

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

| Third Version Amended Drawings | | | | | | | | | | |
|--|------------|-----------------|-----------|------------|--------------------------------|---------------------------|--------------------------------|-----------------------|-------------------------------|----------------------------------|
| Site Area | | 950 | sq.m. | | | | Housing Density | 94.74 | u/ha | |
| | | 0.095 | ha | | | | Residential Density | 305.26 | hr/ha | |
| | | | | | | | | | | |
| | Floor | Habitable Rooms | Bedrooms | Bed Spaces | (Approx) Storage Space (sq.m.) | Table 3.3 Storage (sq.m.) | GIA (sq.m.) | Table 3.3 GIA (sq.m.) | Amenity Space offered (sq.m.) | Private Amenity Required (sq.m.) |
| Unit 1 | Ground | 3 | 2 | 3 | 1.00 | 2 | 64.00 | 61.00 | 40 | 6 |
| Unit 2 | | 4 | 3 | 4 | 3.16 | 2.5 | 88.00 | 74.00 | 90 | 7 |
| Unit 3 | | 3 | 2 | 4 | 1.32 | 2 | 70.00 | 70.00 | 60 | 7 |
| Unit 4 | 1st | 3 | 2 | 3 | 0.80 | 2 | 70.00 | 61.00 | 10 | 6 |
| Unit 5 | | 4 | 3 | 5 | 0.63 | 2.5 | 93.00 | 86.00 | 6 | 8 |
| Unit 6 | | 3 | 2 | 3 | 0.70 | 2 | 65.00 | 61.00 | 10 | 6 |
| Unit 7 | Roof Space | 3 | 2 | 3 | 0.60 | 2 | 75.00 | 70.00 | 8 | 7 |
| Unit 8 | | 3 | 2 | 3 | 0.88 | 2 | 63.00 | 61.00 | 6 | 6 |
| Unit 9 | | 3 | 2 | 3 | 0.84 | 2 | 70.00 | 61.00 | 6 | 6 |
| Totals | | 29 | 20 | 31 | | | 658.00 | 605.00 | | |
| Average | | 3.22 | | | | | | | | |
| | | | | | | | | | | |
| Housing Density | | 94.74 | u/ha | | | | New London Plan Policy D6 | | | |
| Residential Density | | 305.26 | hr/ha | | | | Post Code | | | |
| Bed Spaces/ha | | 326.32 | bs/ha | | | | Dwellings in Post Code Area | | | |
| PTAL (Base Year) | | 1a | | | | | Post Code Area (Google Earth) | | | |
| PTAL Forecast 2031 | | 1a | | | | | Housing Density for Post Code | | | |
| Car Parking | | 9 | | | | | Demolished Dwellings | | | |
| Parking/person | | 0.29 | sp/bs. | | | | New Dwellings | | | |
| Disabled Parking | | 1 | Inclusive | | | | New Dwellings in Post Code | | | |
| Communal Open Space | | 205 | sq.m. | | | | New Housing Density for area | | | |
| Open Space/ person | | 6.61 | sq.m. | | | | Percentage Increase in Density | | | |
| Play Space for Children | | 0 | sq.m. | | | | | | | |
| Play Space Required* | | 13.8 | sq.m. | | | | | | | |
| *GLA Benchmark (interactive Spreadsheet) | | | | | | | | | | |

Current London Plan adopted Policies:

London Plan Policy 3.4 Optimising housing potential

Policy

Strategic, LDF preparation and planning decisions

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

The **Residential Density** of the proposed development is **29/0.095 = 305.26hr/ha**. The **PTAL** for the locality is **1a** (i.e. Numerically ≈ 0.66). The Residential Density range recommended for a Suburban Setting at **PTAL 1a** is between **150 hr/ha to 200 hr/ha**. However, the proposed development has **Residential Density** of **305.26 hr/ha** which is appropriate for **Residential Densities** in the range **200 to 350hr/ha** which requires a **PTAL** in the range of **4 to 6**.

Assuming the incremental **PTAL** and **Residential Densities** over the ranges recommended are approximately linear, then the **PTAL** at **Residential Density** of **305.26hr/ha** should follow the straight-line graph of: $y = mx + c$

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

Then, $305.26 = \left(\frac{\Delta y}{\Delta x}\right) x - 100 = \left(\frac{350-200}{6-4}\right) x - 100$; which gives: $\frac{305.26+100}{75} = x = 5.403 = \text{PTAL}$

The appropriate approximate **Residential Density** within the range **150 to 200hr/ha** can be calculated by assuming the **PTAL** at **1a** is equivalent to numerical value of **0.66** (and **1b ≈ 1.33**). Then:

Residential Density: $y \approx \left(\frac{\Delta y}{\Delta x}\right) 0.66 + 150 = \left(\frac{200-150}{1-0}\right) 0.66 + 150 \approx 183 \text{ hr/ha}$

In addition, the **Housing Density** of the proposed development is **9/0.095 u/ha = 94.74 u/ha**. The **PTAL** for the locality is **1a** (i.e. Numerically ≈ 0.66). The Housing Density range recommended for a Suburban Setting at **PTAL 1a** is between **40 u/ha to 65 u/ha**. However, the proposed development has **Housing Density** of **94.74 u/ha** which at average habitable rooms per hectare of **3.22hr/ha** is appropriate for Housing Densities in the range **55 u/ha to 115 u/ha** which requires a **PTAL** in the range **4 to 6**.

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

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

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

The appropriate approximate **Housing Density** within the range **40 to 65u/ha** can be calculated by assuming the **PTAL** at **1a** is equivalent to **0.66** (and **1b ≈ 1.33**). Then:

Housing Density: $y \approx \left(\frac{\Delta y}{\Delta x}\right) 0.66 + 40 = \left(\frac{65-40}{1-0}\right) 0.66 + 40 \approx 56.5 \text{ units/ha}$

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

A **Residential Density** of **305.26 hr/ha** is **totally inappropriate** for the locality which has a **PTAL** of **1a** (≈ 0.66) when it **actually requires a PTAL of 5.403** in the ranges **4 to 6** shown on **Table 3.2**. The appropriate **Residential Densities** at this setting and **PTAL 1a** with an average of **3.22 hr/u** should be approximately **$\approx 183 \text{ hr/ha}$** .

Similarly, a **Housing Density** of **94.74 u/ha** is **totally inappropriate** for a locality of **PTAL 1a** but would actually require a **PTAL of 5.33** in the highest range **4 to 6**, but the locality has a **PTAL** in the lowest range at a suburban setting. The appropriate ranges for Housing Densities at this setting and **PTAL of 1a** with an average of **3.22 hr/u** should be approximately **$\approx 56.5 \text{ units/ha}$** .

| Table 3.2 Sustainable residential quality (SRQ) density matrix (habitable rooms and dwellings per hectare) | | | |
|---|---|---|---|
| Setting | Public Transport Accessibility Level | Public Transport Accessibility Level | Public Transport Accessibility Level |
| | 0 to 1 (1a = 0.66) | 2 to 3 | 4 to 6 (RD 5.40) (HD 5.33) |
| Suburban | 150–200 hr/ha (183 hr/ha) | 150–250 hr/ha | 200–350 hr/ha (305.26 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 (3.22 hr/unit) | 40–65 u/ha (56.5 u/ha) | 40–80 u/ha | 55–115 u/ha (94.74 u/ha) |
| 2.7–3.0 hr/unit | 50–75 u/ha | 50–95 u/ha | 70–130 u/ha |

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

Red Text for the proposal and

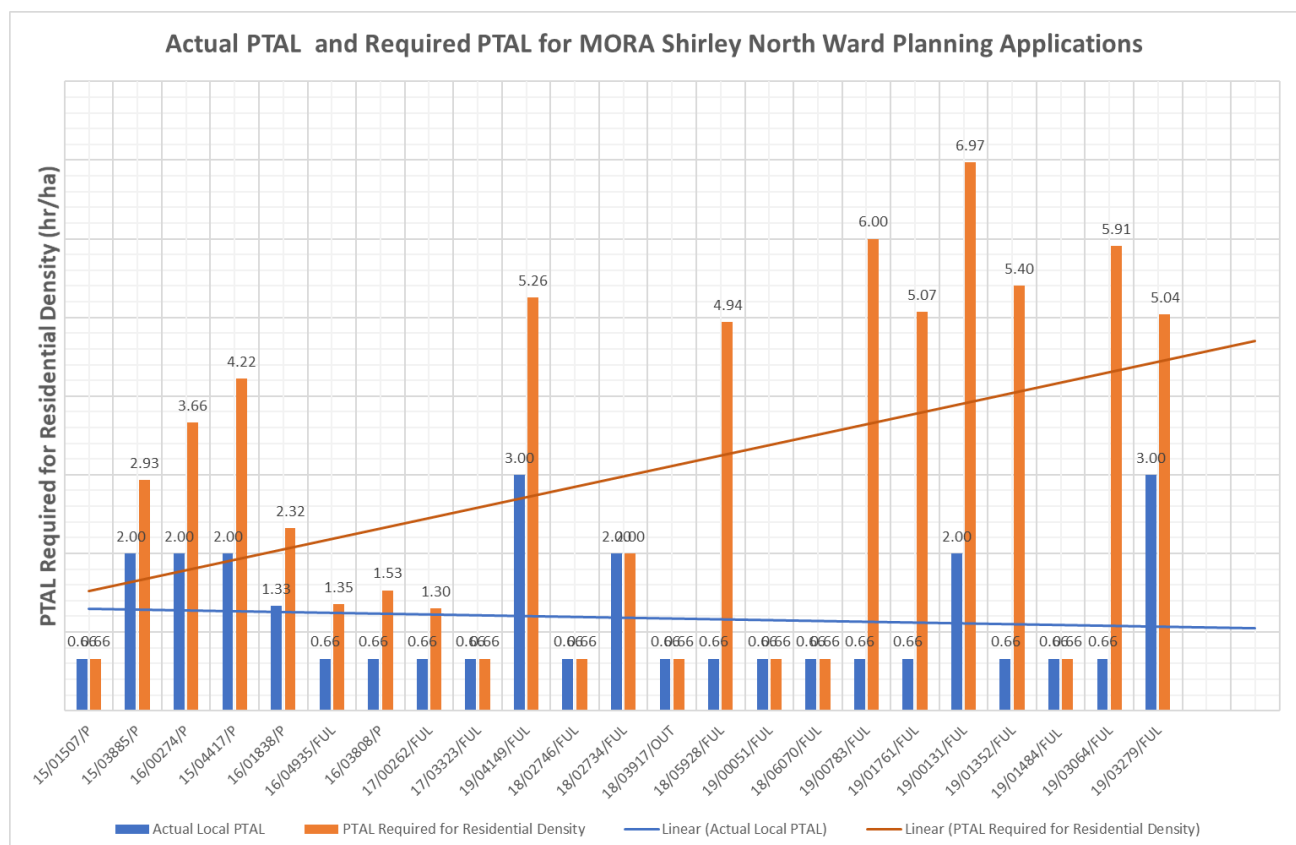
Blue Text as recommended by the current adopted London Plan Policy 3.4

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** from the **lowest PTAL range** to the **highest PTAL range** at a suburban setting, 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)** paras 1.3.50 to 1.3.53.

We therefore **object to this proposed development** on grounds of **significant over-development** at this location and that the **Residential Density of 305.26 hr/ha is totally inappropriate at PTAL 1a** and is more appropriate at a suburban setting with **PTAL of 5.4** (in the maximum public transport range possible) and also that the **Housing Density at 94.74 u/ha** in the highest PTAL range possible, **is inappropriate** at a suburban setting with **PTAL at 1a** and is more appropriate at a locality of **PTAL of 5.33** (in the maximum public transport range possible).

We request that this application be refused on grounds of inappropriately **exceptionally high Housing and Residential Densities** at the proposed site location as defined by the **London Plan Policy 3.4 Optimising Housing Potential**, which would result in future occupants **NOT** having adequate accessibility to local Public Transport Infrastructure services.



Histogram of Cumulative Residential Densities PTAL requirements of recent Developments in the MORA POST CODE area showing required PTAL (Public Transport Accessibility) as compared to the current adopted London Plan Policy 3.4 Guidance of appropriate PTAL.

It is abundantly clear to all local residents (but perhaps not our Council), that the Croydon LPA have systematically ignored the adopted **London Plan Policy 3.4** objectives to manage cumulative developments within the recommended Density limits and provide adequate access to current and forecast Public Transport Infrastructure (PTAL) for the Shirley North Ward of the Borough. The effects of so doing is demonstrated every working day, morning and evening with traffic congestion along the A232 Wickham Road and the A222 Long Lane, which comes to a virtual standstill, polluting the local atmosphere with exhaust fumes. The above histogram shows the trending evidence.

Housing Supplementary Planning Guidance (SPG)

The Housing Supplementary Planning Guidance (2016) gives guidance on the **exceptional circumstances for higher (or lower) densities**.

The London Plan Supplementary Housing Guide para 1.3.8 States:

1.3.8 "... The London Plan is clear that the SRQ density matrix should not be applied mechanistically, without being qualified by consideration of other factors and planning policy requirements. Guidance on considering schemes above or below the ranges in the density matrix is provided below in paras 1.3.50 to 1.3.55.

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**.

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.

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](#).**

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**.

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

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

The following calculations of in-built storage have been arrived at by scaling off the supplied floor plans at magnification of 112% which provided 1cm = 1m. they are therefore approximate.

The proposed development has **insufficient Storage Space** for **every Unit except Unit 2**.

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



Unit 1 has only $\approx 1.00\text{m}^2$ Storage Space when a 2-Bed, 3-Bed Unit requires 2m^2 Storage Space.

Unit 2 has $\approx 3.16\text{m}^2$ Storage Space and this is appropriate for this Unit which is assumed for that of a Disabled occupant and provides storage for a wheelchair and has spatial design for wheelchair access.

Unit 3 has only $\approx 1.32\text{m}^2$ Storage Space when a 2-Bed, 4-Bed Unit requires 2m^2 Storage Space.

Unit 4 has only $\approx 0.80\text{m}^2$ Storage Space when a 2-Bed, 3-Bed Unit requires 2m^2 Storage Space.

Unit 5 has only $\approx 0.63\text{m}^2$ Storage Space when a 3-Bed, 5-Bed Unit requires 2.5m^2 Storage Space.

Unit 6 has only $\approx 0.70\text{m}^2$ Storage Space when a 2-Bed, 3-Bed Unit requires 2m^2 Storage Space.

Unit 7 has only $\approx 0.60\text{m}^2$ Storage Space when a 2-Bed, 4-Bed Unit requires 2m^2 Storage Space.

Unit 8 has only $\approx 0.88\text{m}^2$ Storage Space when a 2-Bed, 3-Bed Unit requires 2m^2 Storage Space.

Unit 9 has only $\approx 0.84\text{m}^2$ Storage Space when a 2-Bed, 3-Bed Unit requires 2m^2 Storage Space.

Additionally, **Unit 5** has only 6m^2 Private amenity open space when it should have 8m^2 Private Open Amenity Space, and

The proposal as amended is in contravention of the **London Plan Policy 3.5 Minimum Space Standards** in terms of adequate minimum in-built storage space for new dwellings which would be **detrimental for the future occupants for the life of the development and therefore this proposed development should be refused.**

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

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.

The offered plans do not show any **dedicated safe play space for the children** of future occupants of this proposed development. The Design and Access Statement states: "*proposal Occupiers will enjoy different kind of levels of the area by experiencing cascades of planters and facilities for the children*" but the development but does not indicate the actual area allocated for Play Spaces for Children to meet London Plan **Policy 3.6**.

Policy 3.6 provides an interactive spreadsheet which allows calculation of the appropriate area for Market Flats of **7 x 2 Bedroom** and **2 x 3 Bedroom** flats. The allocation is 13.8m^2 calculated by using the **GLA Benchmark** of dedicated play space per child.

London Plan Policy 6.11 Smoothing traffic flow and tackling congestion

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

London Plan Policy 6.13 Parking

Policy

Strategic

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

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

Planning decisions

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

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

- a ensure that **1 in 5 spaces** (both active and passive) **provide an electrical charging point** to encourage the uptake of electric vehicles
- b provide parking for disabled people in line with [Table 6.2](#)
- c meet the minimum cycle parking standards set out in [Table 6.3](#)
- d provide for the needs of businesses for delivery and servicing.

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 | | | 35–65 u/ha | | | 45–90 u/ha | |
| 3.1–3.7 hr/unit | 40–65 u/ha | Up to 2 spaces per unit | | 40–80 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 | 40–80 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 | |

Maximum residential parking standards

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

Notes:

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

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

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

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

London Plan Policy 6.13 Table 6.2 – Residential Parking Standards

The proposed development locality has **PTAL of 1a** at base year and is forecast to remain at **PTAL 1a** until at least **2031**. At average habitable rooms per dwelling of **3.22hr/unit** and an appropriate approximate Residential Density which should be **≈183hr/ha** and Housing Density which should be **≈56.5u/ha** requires up to **2 car parking spaces per dwelling** thus requiring **18 parking spaces**, when only **9** are provided, as defined in the **London Plan London Plan Policy 6.13 Table 6.2 – Residential Parking Standards**. The amended plans provide only **9 parking spaces for 31 persons at 0.29 spaces/person**.



Any Overspill car parking would be either in **Round Grove** which is an unclassified adopted road of **347 metres** or in **Woodmere Avenue** between two nasty bends in the road.

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

With this in mind the London Plan on residential parking provision currently requires at **PTAL 1a** in suburban settings in Outer London Boroughs to have up to **2 parking spaces per dwelling** and the emerging Draft new London Plan **Table 10.3** requires outer London boroughs at **PTALs 0-1** to have **1.5 spaces per dwelling** – this would equate to a requirement for **13.5 > 14 car parking spaces** for this proposal, which is rather more realistic than the Croydon Local Plan policy on residential parking.20%

In addition, the Draft London Plan requires that to ensure genuine housing choice, disabled persons' parking should be provided for new residential developments and should ensure that 1 in 5 spaces (20%) (both active and passive) provide an electrical charging point to encourage the uptake of electric vehicles. Only 1 disabled parking space is provided whereas 20% of 9 = 1.8 > 2 spaces and there are two specified electric charging points provided.

The Ward is served by only one single-decker, 40-seater, **367 Bus Route** from West Croydon to/from Bromley via Shirley Oaks Village. This Bus Route via The Glade is becoming heavily congested at peak times and the increase in Residential Densities from cumulative piecemeal developments is causing local passenger frustration. One additional service is dedicated for school children.

The additional cumulative local developments in addition to current proposals is forecast to be an additional **509 residents** which requires reassessment of local bus service provision as residents are converting to other modes of transport to avoid this passenger bus congestion, which is a preference for car usage **which should be avoided**. (See Histogram above)

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:

- a) be prepared with the objective of contributing to the achievement of **sustainable development**¹⁰;
- b) be prepared positively, in a way that is aspirational but deliverable;
- c) be shaped by **early, proportionate and effective engagement between plan-makers and communities**, local organisation's, businesses, infrastructure providers and operators and statutory consultees;
- d) contain policies that are **clearly written and unambiguous**, so it is evident how a decision maker should react to development proposals;
- e) be accessible through the use of digital tools to assist public involvement and policy presentation; and
- f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).

Therefore, the **Croydon Plan para DM10.1** and **para 6.37** relies on the current adopted **London Plan Policy 3.2 Density Matrix** as the **ONLY AVAILABLE GUIDANCE for Scale, Density and Massing** in order to meet the **Croydon Plan Policy DM10.1** and **para 6.37** in addition to the guidance required at **NPPF para 16 d) and NPPF para 122 – Achieving appropriate Densities**.

Achieving appropriate densities

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

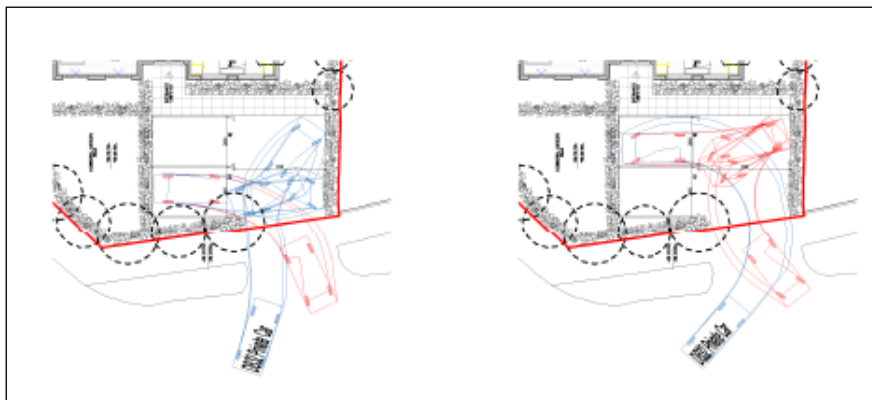
- a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
- b) local market conditions and viability;
- c) the availability and **capacity of infrastructure and services** – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
- d) the desirability of maintaining an area's **prevailing character and setting (including residential gardens)**, or of promoting regeneration and change; and
- e) the importance of securing well-designed, attractive and healthy places.

Thus, **MORA comments** on **Croydon Plan Policy DM10.1** and **para 6.37** are covered by our response above relating to **London Plan Policy 3.4 Optimising Housing Potential. (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

Two bays fronting Round Grove are afforded Electric charging points.

The provided swept path diagrams for access and egress to the parking bays, if all other bays are full, provide the theoretical possible manoeuvres to actually access and exit each of the parking bays Fronting Round Grove of the proposed development. However, the practical ease with which to actually make such manoeuvres would be highly suspect and probably require the skills obtained with an Advanced Driving Test. After a few attempts, and a few scrapes and dents, drivers would likely find the nearest roadside parking space and leave their cars there rather than attempt trying to navigate such complicated manoeuvres. It could be quite an entertaining spectacle, watching such complicated manoeuvres until the driver finally gives up and parks at the nearest free roadside and walks off to get the next bus! Similarly, with the Parking Fronting Woodmere Avenue (See below).



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;**

In addition, Units 5 is deficient in Private Open Space Amenity by Two square metres. This is detrimental for future occupants of Units 5 for the life of the development and is unacceptable and should therefore be refused.

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

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.

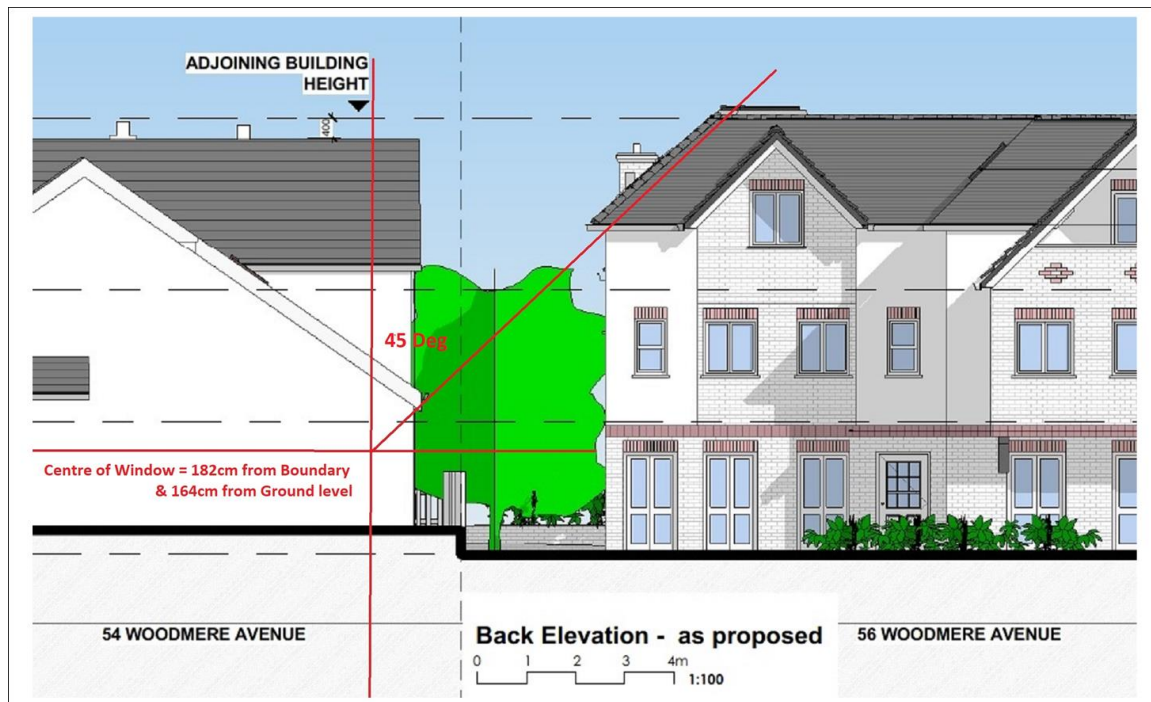
The **Supplementary Planning Document SPD2, (adopted April 2019) Chapter 2 Suburban Residential Developments** at **Para 2.11 Heights & Depths Projecting beyond Building Lines** at pages **36 & 37** describes a **45° rule** for new developments with adjacent properties.

The rear aspect window on the right viewed from the front as shown is for the residents **dining room** which is therefore classed as a **Habitable Room**.

(The Officer at Committee indicated that this window did not serve a habitable room, which was totally incorrect)

This results in failure of the **45° Rule** for the adjacent proposed development

The owner of **54 Woodmere Avenue** has provided the measurements for the centre of the **nearest adjacent ground floor window** which serves their **Dining Room (i.e. which is a Habitable Room)** at **182cm** from the boundary and **164cm** from ground level (see below diagram). The measurements for the 45° assessment from this small window on the right (below) shows an intersect with the proposed development.



Illustrations of the 45° Rule regarding the adjacent property



Rear aspect of 54 Woodmere Avenue

This illustrates that the proposed development **fails to meet the 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 ≈0.6m hole in the ground** in order to meet the adjacent property's height restriction. **If the built form is NOT actually sunk into the ground**, the built form would be **0.6m higher** and the **projected 45° Rule** would show much more of the proposed development would be **above the 45° intercept projection** and **significantly greater non-compliance** to the policy. **The finish floor levels and build height is therefore extremely critical as any deviation would exacerbate the 45° Rule.**

The Planning Officer's comment at the 1st August Planning Committee meeting suggested that the nearest smaller window did not serve a habitable room and indicated that the 45° projection from the main French door windows did not intersect the adjacent proposed dwelling. **This assumption was incorrect.**

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

SPD2 Policy Weight:

In our **Stage1 Complaint CASE5039127** Mr Pete Smith Head of Development stated:

"... We are obliged to determine applications in accordance with the development plan (considered as a whole) unless other material considerations indicate otherwise. The Supplementary Planning Documents, including the London Mayoral Housing SPG and the Council's own Suburban Design Guide SPD, do not enjoy the same weight as the various constituents of the development plan and are treated as other material planning considerations. As the titles suggest, they merely provide guidance in support of development plan policy and do not enjoy the weight of S70(2) of the 1990 Act. ..."

And at **Stage 2 Complaint Case CAS-79367-X3T0W3**; The Director Plan Ms Heather Cheesbrough stated:

"... Having read the Stage 1 response, I am in agreement with Pete Smith, Head of Development Management, that the SPD's, including the London Mayoral Housing Supplementary Planning Guide and the Council's Suburban Design Guide, do not enjoy the same weight as the various constituents of the Development Plan. The SPD's, whilst deliberated as other material considerations, are not a set of statutory rules but provide guidance. ..."

Whereas the Senior Planning Officer at the Pre-App Meeting with developers meeting at Ref: 18/05747/PRE minutes (now in the public domain) stated under *Policy*:

"... The Council's Suburban Design Guide Supplementary Planning Document (SPD2) is now adopted and carries full weight. This document provides guidance for suburban residential developments, development in Areas of Focussed Intensification and extensions and alterations to existing homes across the borough. The document provides technical design guidance that seeks to both limit any negative impact on places, including the amenity of existing residents, and frame opportunities where increased densities can enhance places and bring benefits to communities. You should design any future scheme in line with this document, and refer to it in your Design and Access Statement. ..."

"The above policy background represents the framework within which all applications are determined. Any submitted application must make specific reference to the above policies and how any proposed scheme would address these. Submitted documentation such as Planning Statements and Design and Access Statements need to accurately reflect the current policy position, in order to be considered up to date and relevant documentation."



Failure to bring your application submissions in line with this policy will result in the invalidation of any future planning application. ...”

There seems to be a contradiction by Senior Managers and Planning Committee Members that **SPD2** has **less weight and can therefore be ignored** when a development proposal is approved by committee in breach of SPD2 and challenged by local residents or Resident Associations. However, Planning Case Officers presume it to have **Full Weight** when informing prospective applicants on SPD2 guidance.

So, if it is inconvenient to an approval, SPD2 can be ignored – So what is the actual Policy?

Daylight Study:

The Developer's original light survey was withdrawn because of errors and was replaced by a more accurate report which was presented at Planning Committee on 1 August 2019. However, the scope of the original survey was not extended to take account of concerns to do with possible loss of light and sunshine raised by the owner of 54 Woodmere Avenue at earlier stages of the consultation process.

In summary these are: -

1 possible new shadowing to downstairs and upstairs windows on the westward flank of the front elevation of 54 Woodmere Avenue arising from change to the building line for 56 Woodmere Avenue.

2 new shadowing in the rear garden of 54 Woodmere which has been grown as a flower garden over the last 15 years. The garden itself is north facing and the plants depend on sunshine from the east and west to thrive. The impact of the new footprint and height of the proposed development and tree planting have not been properly assessed. It is neither reasonable nor acceptable for officers to ignore the concerns which have been raised with them over the last 5 months and to state without the evidence for doing so that there will not be any unacceptable loss of amenity.

We note the changes to the elevation and provision of **verandas** which will allow **unacceptable overlooking and invasion of privacy** into the rear private garden of 54 Woodmere Avenue from the **verandas** of **Units 5 & 7** which is a **significant non-compliance** to **Policy DM10.6 a), b) & c)** which requires the amenity of the occupiers of adjoining buildings be protected; and they do not result in **direct overlooking** at close range and specifically, they do not result in direct overlooking of **private outdoor space**. Also, the verandas for units 4, 5, 7 & 8 face North and will NOT provide adequate sunlight or daylight for potential future occupants as required of Policy DM10.6.

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

Policy DM13: Refuse and Recycling

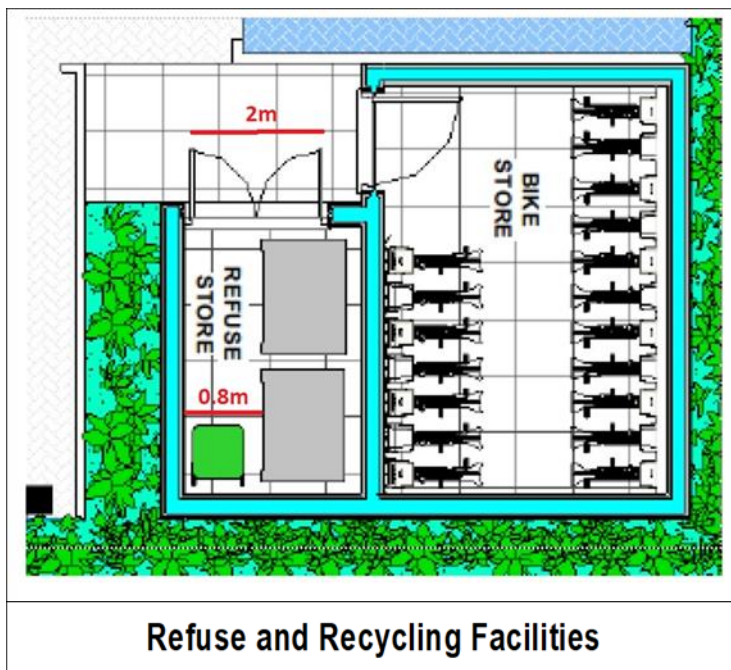
DM13.1 To ensure that the location and design of refuse and **recycling facilities** are treated as an **integral element of the overall design**, the Council will require developments to:

- 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:

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

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



The London Borough of Croydon recommends that developers follow this guidance and that Flats with up to 9 units will require an **1100ltr for general waste**, using this as a base the Council recommend **122.2 ltr's per flat**.

It is understood that there must be a minimum of **150mm clearance** around and between each bin within a storage area. Where there is more than **one bin within a storage area**, as is the case for this proposed development, there must be **2m clearance in front of each bin** to enable it to be accessed and safely moved without needing to move any of the other containers. The

proposed development **does not provide this 2m clearance** in front of the bins to allow safe movement.

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

It is understood that a water supply, with standard tap fittings be available to the bin storage area to enable washing down of the bins, walls and floor. This requirement is not shown on the plans. We therefore **object** to this proposed development on grounds that it does **NOT fully** meet the requirements of **Policy DM13** or **Council Guidance on Refuse & Recycling for New**

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

Developments as published by **Croydon Council** with regard to **Storage Area Capacity, Access and location within the building envelope.**

Policy DM29: Promoting sustainable travel and reducing congestion

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

- a. Promote measures to increase the use of public transport, cycling and walking;
- b. Have a positive impact and must not have a detrimental impact on highway safety for pedestrians, cyclists, public transport users and private vehicles; and
- c. Not result in a severe impact on the transport networks local to the site which would detract from the economic and environmental regeneration of the borough by making Croydon a less accessible and less attractive location in which to develop.

10.33 The extent of the local public transport network includes bus routes within a 10-minute walk, tram routes and train stations within a 15-minute walk and cycle and walking routes within 15-minutes of the development. The exact extent of the local transport networks should be considered in the Transport Assessment.

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

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

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

Policy DM30: Car and cycle parking in new development

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

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



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.** 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 which require overspill on-street parking.

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 massing.** 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 **448** persons resulting from in-fill and redevelopment and therefore the policy **Shirley Place Transport para 11.205 has NOT been fulfilled.**

We conclude that the proposed development is an overdevelopment for the locality and does **NOT** respect the existing **residential and housing densities** and therefore is non-compliant to **Policy: Shirley Place Homes para 11.200 & Character, Heritage and Design para 11.202.** There has been **“absolutely no improved access or transport links” in Shirley** with increased residential occupancy of **409** persons resulting from in-fill and redevelopment and therefore the policy **Shirley Place Transport para 11.205 has NOT been fulfilled.**

We object to the amended proposal on the grounds as elucidated above which mutually contribute to significant reasons for a refusal and therefore, we recommend that this application is refused and the applicant provides a more Policy compliant proposal.



Please list our representation on the on-line public register as **Monks Orchard Residents' Association (Objects)** such that our local affected residents are aware of our 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