

To: Mr James Udall - Case Officer  
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**Monks Orchard Residents' Association  
Planning**

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<b>Reference:</b>	<b>19/04149/FUL</b>
<b>Application Received:</b>	<b>Mon 02 Sep 2019</b>
<b>Application Validated:</b>	<b>Mon 02 Sep 2019</b>
<b>Address:</b>	<b>151 Wickham Road Croydon CR0 8TE</b>
<b>Proposal:</b>	<b>Erection of a two-storey stepped, side and rear extension with alterations to the roof and additional rear dormer, retention of the existing commercial unit and construction of four additional self-contained apartments.</b>
<b>Status:</b>	<b>Awaiting decision</b>
<b>Case Officer:</b>	<b>James Udall</b>
<b>Consultation Close:</b>	<b>Fri 27 Sep 2019</b>
<b>Deadline determination:</b>	<b>Mon 28 Oct 2019</b>

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**Dear Mr Udall**

The Monks Orchard Residents' Association (MORA) represents 3,879 residential households in the Shirley North Ward of the London Borough of Croydon. We are a registered Residents' Association with Croydon Council Local Planning Authority (LPA). On behalf of our members and local residents we object to the above-mentioned planning application development proposal on the following grounds.

We understand the need for additional housing but take the view that **new housing developments must meet the current and emerging planning policies to ensure future occupants have acceptable living standards for the life of the development and that proposed developments respect the character of the area for which it is destined.** Also, that proposed developments have the appropriate **Housing and Residential Densities** which are supported by the current and proposed local Public Transport and other public service Infrastructure to support the additional future occupants of the proposed development.

We only object to development proposals that **do not comply with current adopted planning policies** which are designed to **curtail over-development, meet acceptable accommodation standards for future occupants for the life of the development and retain the local character within acceptable constraints.**

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## 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

Policy 6.13 Parking

### Croydon Local Plan adopted Policies:

Policy DM4: Development in Croydon Metropolitan Centre, District and Local Centres

Policy DM5: Development in Neighbourhood Centres

Policy DM6: Development in Shopping Parades

Policy DM10: Design and character

Policy DM11: Shop front design and security

Policy DM13: Refuse and recycling

Policy DM25: Sustainable Drainage Systems and Reducing Flood Risk

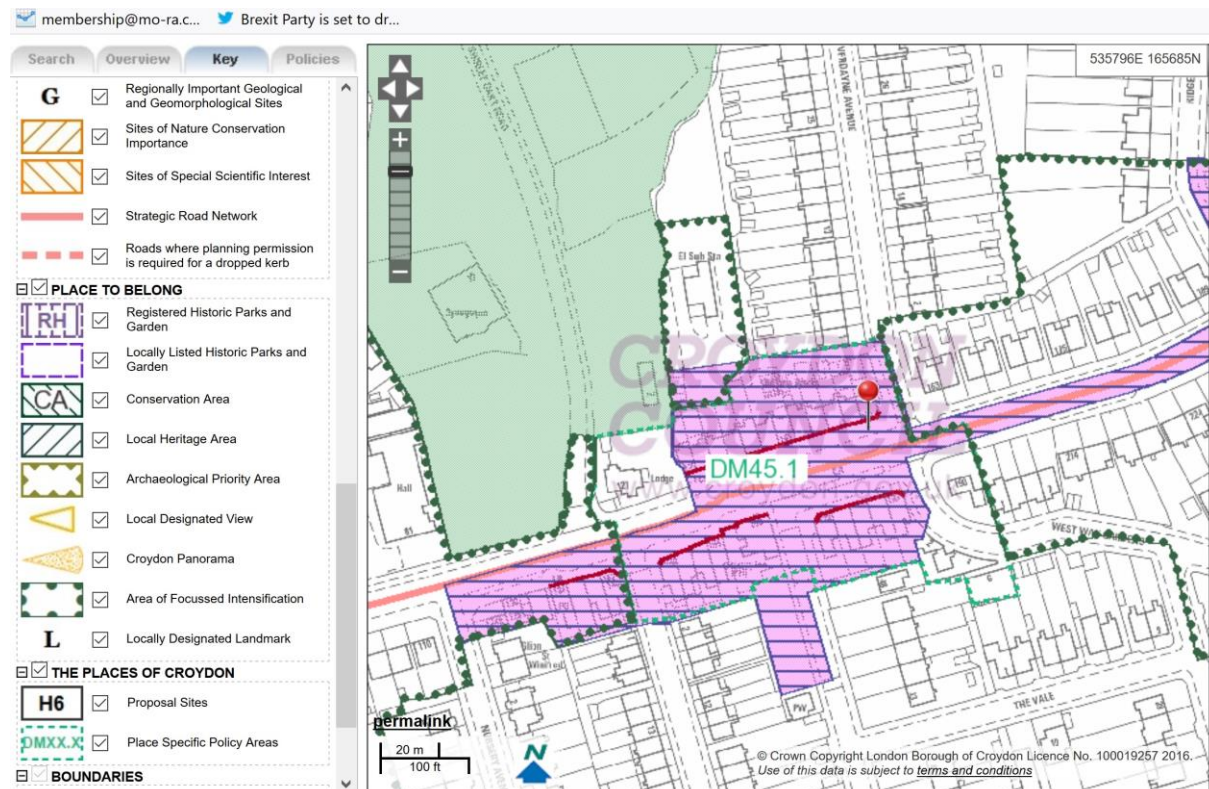
Policy DM29: Promoting sustainable travel and reducing congestion

Policy DM30: Car and cycle parking in new development

Policy DM45: Shirley (Place Specific Policies).

Policy DM45.1: Shirley Local Centre

SPD2 – Suburban Residential Developments



**Policies Map for 151 Wickham Road**

The Policies Map shows that this proposed development is within the **(Urban) Shirley Primary Shopping Area DM45.1** but is NOT within an area designated for "Focussed Intensification".

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## Proposal Parameters

Site Area	214	sq.m.					
	0.0214	ha					
	Floor	habitable Rooms	Bedrooms	Bed Spaces	Storage Space	GIA	Private Amenity Space
Unit 1	Ground	2	1	2	1.5	81.0	5
Unit 2	First	2	1	2	1.5	53.0	5
Unit 3	Ground	1			2.0	75.5	17
	First	2	2	4	2.5		
Unit 4	First	2	1	2	1.4	42.5	5
Unit 5	Second	2	1	2	?	50.0	5
Total		11	6	12			

**Note: As there is no graticule scale on the floor plans, it is not possible to take measurements**

Housing Density	233.64	u/ha		Policis Map	DM45.1
Residential Density	514.02	hr/ha		Primary Shopping Area	
Bed Spaces/ha	560.75	bs/ha		PTAL (Base)	3
Average hr/unit	2.2	hr/unit		PTAL 2031	3

## Current London Plan adopted Policies:

### London Plan Policy 3.4 Optimising housing potential

#### Policy

#### Strategic, LDF preparation and planning decisions

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

The Site Area is **0.0214 hectares** and the proposal has **11 habitable rooms** which equates to a **Residential Density** of  $11/0.0214 \text{ hr/ha} = \mathbf{514.02 \text{ hr/ha}}$ .

Similarly, the proposed development has **5 units** on a site area of **0.0214 hectares**, giving a **Housing Density** of  $5/0.0214 \text{ units/hectare} = \mathbf{233.64 \text{ units/ha}}$ .

The **PTAL** for the locality is **3**. The **Residential Density** range recommended for an **Urban Setting** at **PTAL 3** is between **200 to 450 hr/ha**. However, the proposed development has **Residential Density** of **514.02 hr/ha** which is appropriate for **Residential Densities** in the range **200 to 700 hr/ha** and requires a **PTAL** in the range of **4 to 6**.

Assuming the incremental **PTAL** and **Residential Densities** over the ranges recommended are approximately linear, then the **PTAL** at **Residential Density** of **514.02 hr/ha** should follow the straight-line graph of:  $y = mx + c$

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

**Then,  $514.02 = \left(\frac{\Delta y}{\Delta x}\right)x - 800 = \left(\frac{700-200}{6-4}\right)x - 100$ ; which gives:  $\frac{514.02+800}{250} = x = 5.256 = \text{PTAL}$**

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This proposal requires a **PTAL of 5.256** when it should be **PTAL of 3** (which shows that the available **Public Transport Infrastructure** cannot support this **Residential Density** at this location).

In addition, the **Housing Density** of the proposed development is **5/0.0214 u/ha = 233.64 u/ha**. The **PTAL** for the locality is **3**. The **Housing Density** range recommended for a Suburban Setting at **PTAL 3** is between **70 to 170 u/ha**. However, the proposed development has a **Housing Density** of **233.64 u/ha** which is appropriate for **Housing Densities** in the range **70 to 260 u/ha** which requires a **PTAL** in the range of **4 to 6**.

Again, assuming the incremental **PTAL** and **Housing Densities** over the ranges recommended are approximately linear, then the **PTAL** at **Housing Density** of **84.03u/ha** should follow the straight-line graph of:  $y = mx + c$

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

**Then,  $233.64 = \left(\frac{\Delta y}{\Delta x}\right)x - 310 = \left(\frac{260 - 70}{6 - 4}\right)x - 310$ ; which gives:  $\frac{233.64 + 310}{95} = x = 5.722 = \text{PTAL}$**

This proposal requires a **PTAL of 5.722** when it should be **PTAL of 3** (which shows that this **Housing Density** is inappropriate for this locality with the current and forecast available **Public Transport Infrastructure**).

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)
PTAL	0 to 1	2 to 3	4 to 6
Urban	150–250 hr/ha	200– <b>450</b> hr/ha	200–700 hr/ha <b>(514.02 hr/ha)</b>
3.8–4.6 hr/unit	35–65 u/ha	45–120 u/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 <b>(2.2 hr/unit)</b>	50–95 u/ha	70– <b>170</b> u/ha	70–260 u/ha <b>(233.64 u/ha)</b>
<b>Red Text: Proposal</b>		<b>Blue Text: Recommended</b>	
Housing Density		233.64 u/ha	
Residential Density		514.02 hr/ha	
PTAL (Base)	& 2031	3	

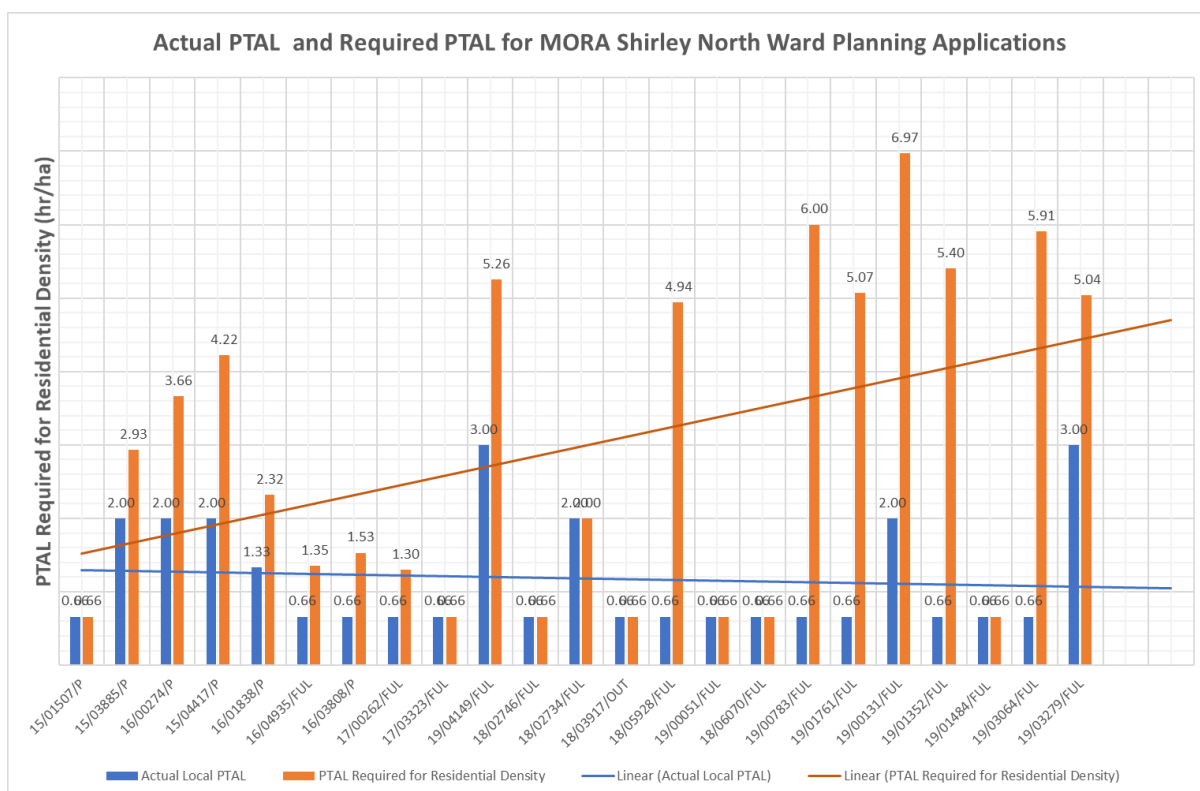
This is clearly an **overdevelopment** for this **Urban Primary Shopping Centre location** for the available **public transport infrastructure** as the proposal has no car parking provision and as the applicant has **NOT** supplied any **justification** for **NOT** meeting the **Policy 3.4** or any replacement policy. This application should be **refused** as **over-development** for the **location** at this **PTAL of 3** for a more appropriate **Residential** and **Housing Density** proposal. The **Residential Density** requires a **PTAL** of **5.26** and **Housing Density** requires a **PTAL** of **5.722** at a location with a **TfL** current and forecast PTAL at 2031 of just **3**, **without any justification as required of the London Plan Supplementary Housing Guide para 1.3.8.**

## 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.**

It is abundantly clear that the Croydon LPA have systematically ignored this policy to manage local development to meet the current adopted London Plan Policy 3.4 objectives or to manage development to provide adequate access to the current and forecast Public Transport Infrastructure 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 A323 Wickham Road which comes to a virtual standstill, polluting the local atmosphere with exhaust fumes.

The following Histogram illustrates recent cumulative development proposals, showing the actual PTALs and the Recommended PTALs based upon the current adopted London Plan Policy 3.4 - Optimising Housing Potential and shows the trend lines for recent applications in the MORA Post Code Area.



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



## Policy 3.5 Quality and Design of Housing Developments

### Policy

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.

C LDFs should incorporate requirements for accessibility and adaptability<sup>[1]</sup>, minimum space standards<sup>[2]</sup> including those set out in Table 3.3, and water efficiency<sup>[3]</sup>. The Mayor will, and boroughs should, seek to ensure that new development reflects these standards. The design of all new dwellings should also take account of factors relating to 'arrival' at the building and the 'home as a place of retreat'. New homes should have adequately sized rooms and convenient and efficient room layouts which are functional and fit for purpose, meet the changing needs of Londoners over their lifetimes, address climate change adaptation and mitigation and social inclusion objectives and should be conceived and developed through an effective design process<sup>[4]</sup>.

D Development proposals which compromise the delivery of elements of this policy may be permitted if they are demonstrably of exemplary design and contribute to achievement of other objectives of this Plan.

Table 3.3 - Minimum Space Standards for new Dwellings						
Number of bedrooms	Number of bed spaces	Minimum GIA (m <sup>2</sup> )			Built-in storage (m <sup>2</sup> )	
		1 storey dwellings	2 storey dwellings	3 storey dwellings		
1b	1p	39 (37)*			1	
	2p	50	58		1.5	
2b	3p	61	70		2	
	4p	70	79			
	GIA	Bedrooms	Bed Spaces	Storage Offered	Table 3.3 Storage	Table 3.3 GIA
Unit 1	81	1	2	1.5	1.5	50
Unit 2	53	1	2	1.5	1.5	50
Unit 3	75.5			2	2	79
	0	2	4	2.5		
Unit 4	42.5	1	2	1.4	1.5	50
Unit 5	50	1	2	?	1.5	50

The analysis of Policy 3.5 Quality and Design of Housing Developments Table 3.3 show that:

**Unit 3** has inadequate minimum space Standard Gross Internal Area (GIA) for a 2b4p 2-storey dwelling as defined by the policy.

**Unit 4** has inadequate minimum space standard in-built Storage Area by 0.1m<sup>2</sup> as defined by the policy

**Unit 5** has questionable in-built Storage as the storage space is NOT stated and it is not possible to scale off the provided plans as there is no scale graticule provided on the 1:50 plans.

Thus, this proposed development does **NOT** fully meet the current adopted London Plan Policy 3.5 for quality and design of housing developments for future occupants, for the life of the development and as there are no justifiable reasons quoted for **NOT** meeting the policy in full, this application should be refused.

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

### 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 Mayor's Supplementary Planning Guidance [Providing for Children and Young People's Play and Informal Recreation](#) sets out guidance to assist in this process.

For a **4x1bed Unit** and **1x2 bed Unit** accommodation, the London Plan Policy 3.6 interactive spreadsheet requires a minimum **Play Space for Children** of **9.3m<sup>2</sup>** using the GLA Benchmark of standard **10m<sup>2</sup>** of dedicated play space per child. As there is no allocation whatsoever, this proposed development should be refused on the grounds of non-compliance to the London Plan Policy 3.6 Play Space for the future children of the families of this proposed development.

## 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.

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).

**6.48** Operational parking for maintenance, servicing and deliveries is required to enable a development to function. Some operational parking is likely to be required on site and should be included in the calculation of total parking supply.

At an **Urban Setting**, **PTAL 3** Recommended **Residential Density of 450 hr/ha** and **Housing Density of 170 u/ha** the parking provision in accordance with London Plan **Policy 6.13 Table 6.2** requires up to **One space per unit**. **There are none!**

This proposed redevelopment has **no parking provision** for future occupants or for the loading and unloading of goods for the Shop Premises for the life of the proposed development at this proposed development location in an urban setting at **PTAL 3** and recommended Residential Density of **450hr/ha** and Housing Density of **170u/ha**.

Table 6.2 requires up to 1 parking space per dwelling, thus for this development of 5 Units requires up to 5 parking spaces and there are **NONE!**

## 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-site<sup>3</sup>

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.

### Croydon Local Plan adopted Policies:

**Policy DM4: Development in Croydon Metropolitan Centre, District and Local Centres**

**DM4.1, DM4.2 & DM4.3** Policy definitions gives no guidance on whether this proposed development would be acceptable or otherwise.

**Policy DM5: Development in Neighbourhood Centres**

**Policy DM5.1, DM5.2** Policy Definitions also gives no guidance on whether this proposed development would be acceptable or otherwise.



## Policy DM6: Development in Shopping Parades

**Policy DM6** Policy Definition also gives no guidance on whether this proposed development would be acceptable or otherwise.

**DM4, 5 & 6** Policies gives very little guidance on actual requirements of Residential developments in shopping centre developments applicable to this proposal which is evidential of a lack of definition of acceptability or otherwise of any proposals in this situation. This identifies a deficiency in the Croydon Local Plan on the provision of residential accommodation within retail areas including combined studio or apartments accommodation within or above retail facilities.

## 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.**

**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, and DENSITY" – **How is it possible to respect these parameters if there is NO guidance?** Also, these are required as defined by the (new) **NPPF Para 16 & Para 122** which states:

### Para 16

#### **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;***  
and;
- e) ***be accessible through the use of digital tools to assist public involvement and policy presentation;***

and at para 122

## Achieving Appropriate Densities:

**Para 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;*

*and at sub para d);*

*d) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change.*

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**.

Thus, **our 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**.

**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.

**The proposed development does NOT incorporate ANY high quality communal outdoor amenity space and is therefore NON- COMPLIANT to Policy DM10.5 and therefore this proposal be refused.**

**Unit 1** has a stated **17m<sup>2</sup>** Private “garden” which in reality is the 1.3m width paved pathway access from the living room to the street. Any visitor or delivery operative to the property will have a direct view of the internal living accommodation when standing at the entrance door.

**Unit 2** Private Balcony is configured as **≈1.5m wide** which means the depth is **≈3.33m** which is an awkward configuration considering it is unlikely to ever get direct sunlight and therefore **non-compliant** to **Policy DM10.6 d)**.

**Unit 3** Private Balcony is level with and overlooking at about 0.5m with the adjacent public footpath. Easily to shake hands with passers-by on the public footpath! Would therefore not describe this as a **“Private”** Amenity Space!

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

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

The **Flat roof-forms** for **Unit 2** and **Unit 3** do not positively contribute to the local character **roof forms** as all local roof forms are of pitched tiled roofs. This detracts from the historic architecture of the local Centre and should therefore be avoided and the roof form of local character be implemented. Therefore, this proposal is **non-compliant** to **DM10.7 para d)** and should be refused. (See Elevations below)



### Proposed Elevation from Verdayne Avenue showing Roof Forms

**DM10.8** To ensure a cohesive approach is taken to the design and management of landscape within the borough the Council will require proposals to:

- a. Incorporate hard and soft landscaping;
- b. Provide spaces which are visually attractive, easily accessible and safe for all users, and provide a stimulating environment;
- c. Seek to retain existing landscape features that contribute to the setting and local character of an area;
- d. Retain existing trees and vegetation including natural habitats<sup>43</sup>;
- e. In exceptional circumstances where the loss of mature trees is outweighed by the benefits of a development, those trees lost shall be replaced with new semi-mature trees of a commensurate species, scale and form; and

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Adherence with Supplementary Planning Guidance 12 Landscape Design and the Croydon's Public Realm Design Guide, or equivalent, will be encouraged to aid compliance with the policies contained in the Local Plan.

The proposed development has virtually no landscaping area which could be considered attractive and therefore is non-compliant to **Policy DM10.8** in its entirety.

**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.

The proposed development does not reflect the architecture of the existing and surrounding character or features of the existing structures and is therefore NOT compliant to **Policy DM10.9 para a), b & d).** and should be refused.

#### **Policy DM11: Shop front design and security**

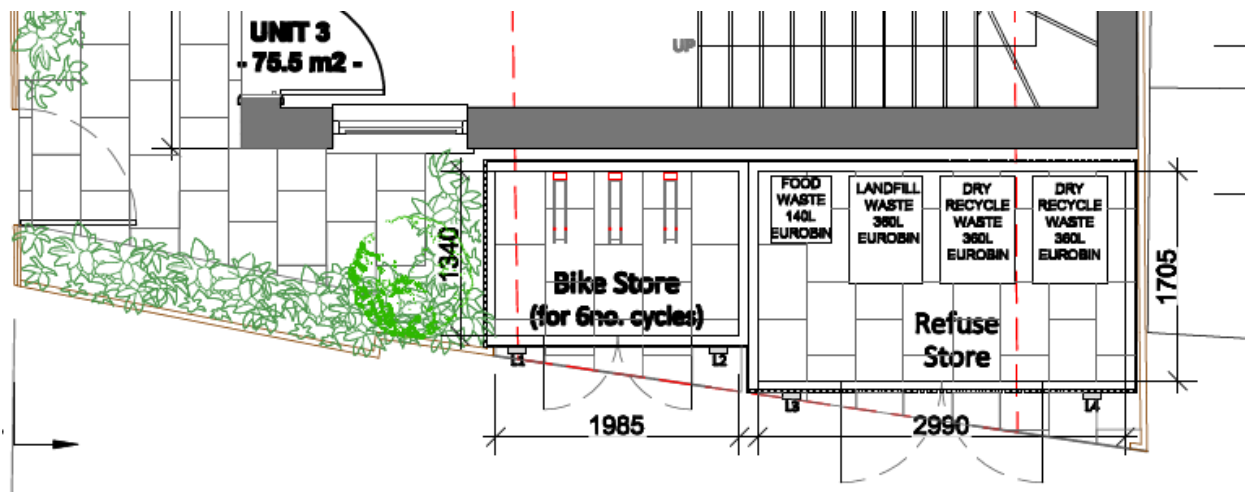
#### **No Comment**

#### **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.



The refuse & recycling storage is NOT within the building envelope or has been integrated within the landscape covered facilities that are located behind the building line. The Refuse is below the first-floor windows of **Unit 3** which would allow smells emanating from the storage, into the proposed dwelling at the first floor Unit Landing and **Bedroom 2 of Unit 3**.

We object to this proposed development on grounds of inappropriate location of Refuse and Recycling storages not being within the building envelope and **below a habitable room window**.

## 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

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.

The Histogram above Illustrates the cumulative excessive PTAL Requirement above the Local available PTAL due to Increased Residential Densities of Applications in the MORA Post Code Area and also shoes the ongoing PTAL linear trend requirement.

**This is clear evidence that there is no management of cumulative developments within the locality and there has been no easement resultant on Community Infrastructure Levy (CIL) from local developments in the Shirley Wards.**

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

There is NO car parking provision within this proposed development See **London Plan Policy 6.13** above.



## **Policy DM45: Shirley (Place Specific Policies).**

### **Policy DM45.1: Shirley Local Centre**

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

- Retain the continuity of ground floor active frontages and allow flexibility at first floor and above for mixed use;
- Reference, respect and enhance **architectural features** such as the consistent rhythm and articulation of fenestration and retain features such as the triangular bay windows;
- Complement the existing predominant building heights of 2 storeys up to a maximum of 4 storeys; and
- Incorporate or retain traditional shop front elements such as fascia's, pilasters and stall risers.

### **SPD2 – “Suburban” Residential Developments**

**SPD2 Does NOT apply to this proposed development as:**

- the locality is designated Urban (*Not “Suburban”*) Primary Shopping area and
- this location is NOT within an area designated as “Focussed Intensification”

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

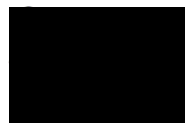
Please list our representation on the on-line public register as **Monks Orchard Residents' Association (Objects)** such that our local affected residents are aware of our support.

Please inform us at [planning@mo-ra.co](mailto: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:**

Mr. Pete Smith  
Sarah Jones MP  
Cllr. Sue Bennet

Cllr. Richard Chatterjee  
Cllr. Gareth Streeter

Head of Development Management (LPA)  
Croydon Central (Shadow Housing Minister)  
Shirley North Ward Councillor  
Shirley North Ward Councillor  
Shirley North Ward Councillor

**Bcc:**

MORA  
Local Residents  
Interested Parties

Executive Committee