MORA
MONKS ORCHARD RESIDENTS' ASSOCIATION

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Monks Orchard Residents' Association
Planning

To: Case Officer – Mr Wayne Spencer
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20th October 2019
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Reference	**19/04705/FUL**
Application Received	**Wed 02 Oct 2019**
Application Validated	**Wed 02 Oct 2019**
Address	**16-18 Ash Tree Close Croydon CR0 7SR**
Proposal	**Demolition of the existing dwellings. Erection of 8 x 3-bed semi-detached dwellings with associated access, parking, refuse and cycle stores.**
Case Officer:	**Wayne Spencer**
Consultation Close:	**Wed 30 Oct 2019**
Deadline determination:	**Wed 27 Nov 2019**

Dear Mr Spencer & Development Management

The Monks Orchard Residents' Association (MORA) represents over 3,800 residents 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 only object when proposals do not comply with current adopted planning policies** which are designed to **minimise overdevelopment** and **retain the local character** within acceptable constraints. The type face with green background are **current adopted** Planning Policies.

Recent Planning History

Reference	08/01150/P
Application Received	Tue 01 Apr 2008
Application Validated	Fri 27 Jun 2008
Address	16-18 Ash Tree Close, Croydon, CR0 7SR
Proposal	Demolition of existing buildings; erection of 6 two storey four-bedroom terraced houses with accommodation in roof space; formation of access road and provision of associated parking
Status	Decided
Decision	Permission Refused

Reason(s) for refusal: -

1. The development would be out of keeping with the pattern of development in the locality and would result in an overdevelopment of the site detrimental to the visual amenity of the street scene and would thereby conflict with Policies UD2, UD3 and H2 of the Croydon Replacement Unitary Development Plan (The Croydon Plan);
2. The proposal by reason of the number of dwellings and their size, siting and design would result in an unsatisfactory cramped and overcrowded backland development that would fail to respect the character of the surrounding area conflicting with Policies UD2, UD3 and H5 of the Croydon Replacement Unitary Development Plan (The Croydon Plan);
3. The siting of the access road and parking area would be detrimental to the residential amenities of adjoining occupiers by reason of noise and general disturbance and would thereby conflict with Policies UD13 and EP1 of the Croydon Replacement Unitary Development Plan (The Croydon Plan)
4. The design and layout of the parking and access would not be safe, efficient and well designed and would thereby conflict with Policies UD13 and T11 of the Croydon Replacement Unitary Development Plan (The Croydon Plan)
5. The development would result in sub-standard accommodation by reason of inadequate outlook from bedroom 3 of each dwelling and would thereby conflict with Policy H7 of the Croydon Replacement Unitary Development Plan (The Croydon Plan)
6. The development would provide an overprovision of car parking within the site discouraging the use of sustainable transport alternatives contrary Policy T8 of the Croydon Replacement Unitary Development Plan (The Croydon Plan)
7. The applicant has failed to provide sufficient information showing how the boundary trees are to be protected during construction and retained following completion of the works. The trees offer a good level of visual amenity and their removal would be detrimental to the character of the area contrary to PoliciesSP8 and NC4 of the Croydon Replacement Unitary Development Plan (Plan).

This application should be refused on the similar grounds used for refusal of the application in 2008 as the situation has NOT substantially changed.

Relevant Planning Policies:

London Plan Policies adopted 2016

London Plan Policy 3.4 Optimising Housing Potential

London Plan Policy 3.5 Quality and Design of Housing Developments

London Plan Policy 6.13 Parking

Housing Supplementary Planning Guidance (2016)

Croydon Local Plan Policies

Policy DM10: Design and character

Policy DM13: Refuse and recycling

Policy DM23: Development and construction

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).

Supplementary Planning Guidance SPD2 Suburban Residential Developments

The proposed development has the following parameters:

19/04705/FUL | 16-18 Ash Tree Close Croydon CR0 7SR													
Sire Area		1335	sq.m.										
Site Area		0.1335	ha										
		Habitable Rooms											
	Bedrooms	Ground Floor (*)	First Floor	Roof Space	Bed Spaces (Occupants)	Storage Space (Built-in)	Built-in Storage Table 3.3	GIA Offered	Table 3.3 GIA (3b5p3s)	Amenity Required (min)	Car Parking	Disabled Parking	Electric Charging Points
Unit 1	3	2	2	1	5	Not Stated	2.5	Not Stated	99.00	7	1	0	0
Unit 2	3	2	2	1	5	Not Stated	2.5	Not Stated	99.00	7	1	0	0
Unit 3	3	2	2	1	5	Not Stated	2.5	Not Stated	99.00	7	1	0	0
Unit 4	3	2	2	1	5	Not Stated	2.5	Not Stated	99.00	7	1	0	0
Unit 5	3	2	2	1	5	Not Stated	2.5	Not Stated	99.00	7	1	0	0
Unit 6	3	2	2	1	5	Not Stated	2.5	Not Stated	99.00	7	1	0	0
Unit 7	3	2	2	1	5	Not Stated	2.5	Not Stated	99.00	7	1	0	0
Unit 8	3	2	2	1	5	Not Stated	2.5	Not Stated	99.00	7	1	0	0
Total	24	16	16	8	40					56	8	0	0
		40											
(*) Sitting & Dining Open Plan areas = 2 Habitable Rooms													
Average hr/unit		5											
Housing Density		59.93	Units/ha										
Redidential Density		299.63	hr/ha										
PTAL	2011	1a											
PTAL	2031	1a											

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 supplied plans show a **reception** area which includes **Open Plan - sitting** and **dining** areas without any partitioning. These are **functional areas** and therefore, as **Residential Density** is determined by the number of **'Habitable Rooms'** per hectare (and not habitable Area) these **functional areas** need to be interpreted as two separate **habitable rooms** for the purposes of calculating **Residential Density.**

The **Residential Density** of the proposed development is **40/0.1335 = 299.63hr/ha.** The **PTAL** for the locality is **1a** (i.e. Numerically ≈0.66). The **Residential Density** range recommended for a **Suburban** Setting at **PTAL 1a** is between **150 to 200hr/ha**. However, the proposed development has **Residential Density** of **299.63hr/ha** which is in the **highest range** of **PTAL** 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 **299.63hr/ha** should follow the **linear graph** of: $y = mx + c$

where, y = **Residential Density**, m = (Δy/Δx) = slope, x = **PTAL** & c = y intercept when x = 0

Then; $299.63 = \left(\frac{\Delta y}{\Delta x}\right) x - 100 = \left(\frac{350-200}{6-4}\right) x - 100 = \frac{299.63+100}{75} = x = 5.3284 = PTAL$

In addition, assuming the incremental **PTAL** and **Housing Density** ranges are approximately linear over the ranges, the **Housing Density at 8/0.1335 u/ha = 59.93u/ha with an average habitable rooms per unit of 40/8 = 5.0hr/u requires a PTAL to be in the range of 35-65 u/ha when the actual PTAL is also in the mid-range of 2 to 3 as can be shown by the formula:** $y = mx + c$

where y = **Housing Density**, m= (Δy/Δx) = slope, x = **PTAL** & c = y intercept when x = 0.

Then, $59.93 = \left(\frac{\Delta y}{\Delta x}\right) x - 50 = \left(\frac{65-35}{3-2}\right) x - 50 = \frac{59.93+25}{30} = x = 2.831 = PTAL$

If the **PTAL** between 0 and 2 is assumed linear the **PTAL 1a = 0.66** and **PTAL 1b = 1.33.** Then it can be shown from the **London Plan Density Matrix Table 3.2** at a **suburban setting** to illustrate that the **Residential Density** of the proposed development is **totally inappropriate at 299.63hr/ha** for the locality which has a **PTAL** of **1a (≈0.66)** when it **actually requires a PTAL of 5.33** in the ranges **4 to 6** shown on **Table 3.2.**

Similarly, a **Housing Density** of **59.93u/ha** is totally **inappropriate** for a locality of **PTAL 1a** which would actually require a **PTAL of 2.83 (approaching 3)** – in the range **2 to 3,** but the locality has a **PTAL of 1a** in the lowest range at a **suburban setting**.

Table 3.2 Sustainable residential quality (SRQ) density matrix (habitable rooms and dwellings per hectare)

Setting	Public Transport Accessibility Level (PTAL)	Public Transport Accessibility Level (PTAL)	Public Transport Accessibility Level (PTAL)
	0 to 1 (1a=0.66)	2 to 3 (HD=2.83)	4 to 6 (RD=5.33)
Suburban	150–200 hr/ha (183hr/ha)	150–250 hr/ha	200–350 hr/ha (299.63hr/ha)
3.8–4.6 hr/unit (5hr/unit)	35–55 u/ha (48.2u/ha)	35–65 u/ha (59.93u/ha)	45–90 u/ha
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
Residential Density		299.63	hr/ha
Housing Density		59.93	Units/ha

Extract from London Plan Policy 3.4 Optimising Housing Potential - Table 3.2 (Appropriate Densities for this locality shown in BLUE, actuals shown in RED)

The **appropriate** value for **Residential & Housing Densities** **at this setting** at **PTAL 1a** **with an average of 5.0hr/u** are established similarly by: $y = mx + c$

where y = **Residential Density**, m = (Δy/Δx) = slope, x = PTAL (1a ≡ 0.66), and c = y intercept when x = 0

Then $y = \textbf{\textit{Residential Density}} = \left(\frac{\Delta y}{\Delta x}\right) x + c = \left(\frac{200-150}{1-0}\right) 0.66 + 150 \approx$ **183 hr/ha**

where y = **Housing Density**, m = (Δy/Δx) = slope, x = PTAL (1a ≡ 0.66) and c = y intercept when x = 0

Then $y = \textbf{\textit{Housing Density}} = \left(\frac{\Delta y}{\Delta x}\right) x + c = \left(\frac{55-35}{1-0}\right) 0.66 + 35 \approx$ **48.2 units/ha**

The guidance for **exceeding** **the density ranges** are set out in the **London Plan Supplementary Planning Guidance at paragraph 1.3.8 which states:**

"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."***

Developments above the density ranges

Para 1.3.50 ..."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]."

The Public Transport Accessibility Level (PTAL) at this location is **1a** in the ranges 0 to 6 and as such is in the lowest category range - Zero, 1a, 1b, 2 … to … 5, 6a, 6b.

See: http://content.tfl.gov.uk/connectivity-assessment-guide.pdf

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 livability, 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.

The justifications did not include the provisions of **SPG paras 1.3.50 to 1.3.52** with regard to:

- The proposal is not in a ***"town centre, opportunity areas or an intensification area, or is surplus industrial land or other large sites"***[103]
- Did not consider ***"planned public transport connectivity (PTAL)"***
- Did not consider the loss of ***"residential and environmental quality"***
- Did not consider the ***"scheme's overall contribution to local 'place making'"***
- Did not consider ***"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;"***
- Did not consider whether ***"the proposal is in the types of accessible location the London Plan considers appropriate for higher density development*** *(e.g. town centres, opportunity areas, intensification areas, surplus industrial land, and other large sites)."*

The applicant has given **NO specific justification** or reasoning for **NOT meeting the current adopted London Plan Policy 3.4 on Optimising Housing Potential** within the **broad density ranges** and constraints given at **Table 3.2** to ensure that future occupants of the proposed developments have **adequate accessibility to local Public Services and Transport Infrastructure.**

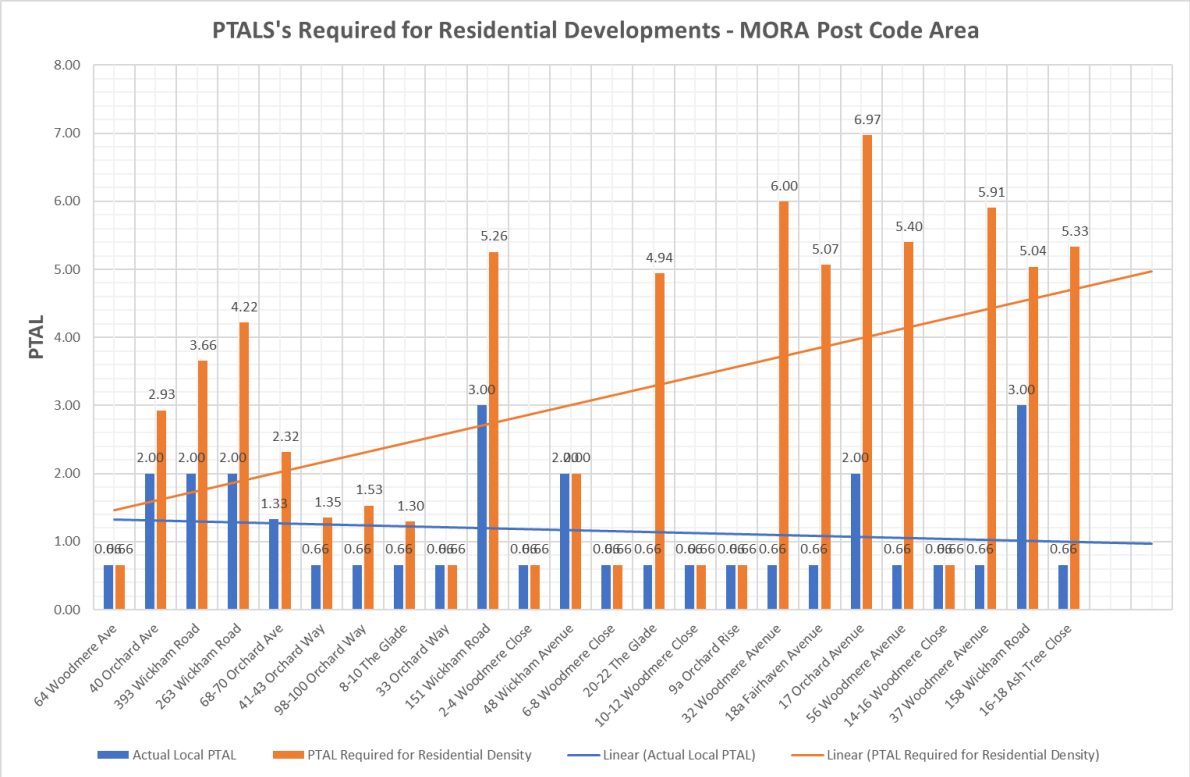


Illustration of excessive PTAL Requirement above the Local available PTAL due to Cumulative Increase in Densities of Applications in the MORA Post Code Area showing the ongoing PTAL linear trend requirement.

The population of the MORA Post Code area has increased by approximately 550 since 2015 with absolutely no increase in supporting infrastructure; during which time we have lost two GP surgeries and those patients merged onto remaining GP Lists, resulting in increased delays with existing surgeries for obtaining appointments.

If the appropriate Housing and Residential Densities are NOT observed, as in this case, the public Services and support infrastructure and Public Transport accessibility becomes oversubscribed at the higher density localities and cannot meet the required demand. With Planning Policies restricting Car Parking provision, it is necessary for Public Transport to provide additional capacity to mitigate the effects of the reduced car parking provision for new developments and the numbers of new occupants.

The Monks Orchard Post Code Area (http://www.mo-ra.co/about/area/) has a single bus route 367 and is a single decker service through a residential area, within a road network which is not suitable for large double decker buses. The passenger carrying capacity is therefore limited and is also infrequent such that the buses get busier at the sites of inappropriate high residential densities, as they travel though the residential area; some residents have a 15-20min walk to their nearest bus stop. As the service is only 20min intervals, these waiting passengers become very frustrated and eventually resort to other means of transport which is likely their personal car which is a significant waste of available road space for only one driver and thus contributes to local traffic congestion.

Croydon Local Plan at para 6.41 States:

6.41 The National Planning Policy Framework in paragraph 50 encourages location authorities to plan for the delivery for a wide choice of high-quality homes and sustainable communities. It advises that in doing so, development plans should be based on evidence of local needs and demands. The notions of balance and risk are also recognise in the National Planning Policy Framework, which states that the **cumulative impact** of standards and polices should not put the implementation of the plan at serious risk (paragraph 174).

We keep hearing statements to the effect that improved infrastructure follows developments but we cannot see any evidence of this in our area. The locality has not seen any recent improvement of infrastructure from **Community Infrastructure Levy (CIL)** contributions and therefore the collected **CIL** has not contributed to **Shirley North Ward** localities lack of general **public services and infrastructure**.

Also, the questionable statements that Croydon has a high number of applicants on the housing waiting list – but these dwellings are never occupied from people on the waiting list as **a)** they are not affordable and **b)** these dwellings are purchased by people from outside our waiting list catchment area and **c)** possibly purchased by overseas buyers for leasehold renting. The interpretation of current Planning Policies to meet housing needs or targets are definitely not sensible Planning Policies for Croydon's homeless.

As Stated in the current adopted London Plan Policy 3.4 Optimising housing potential, Development Proposals which compromise this policy, "should be resisted".

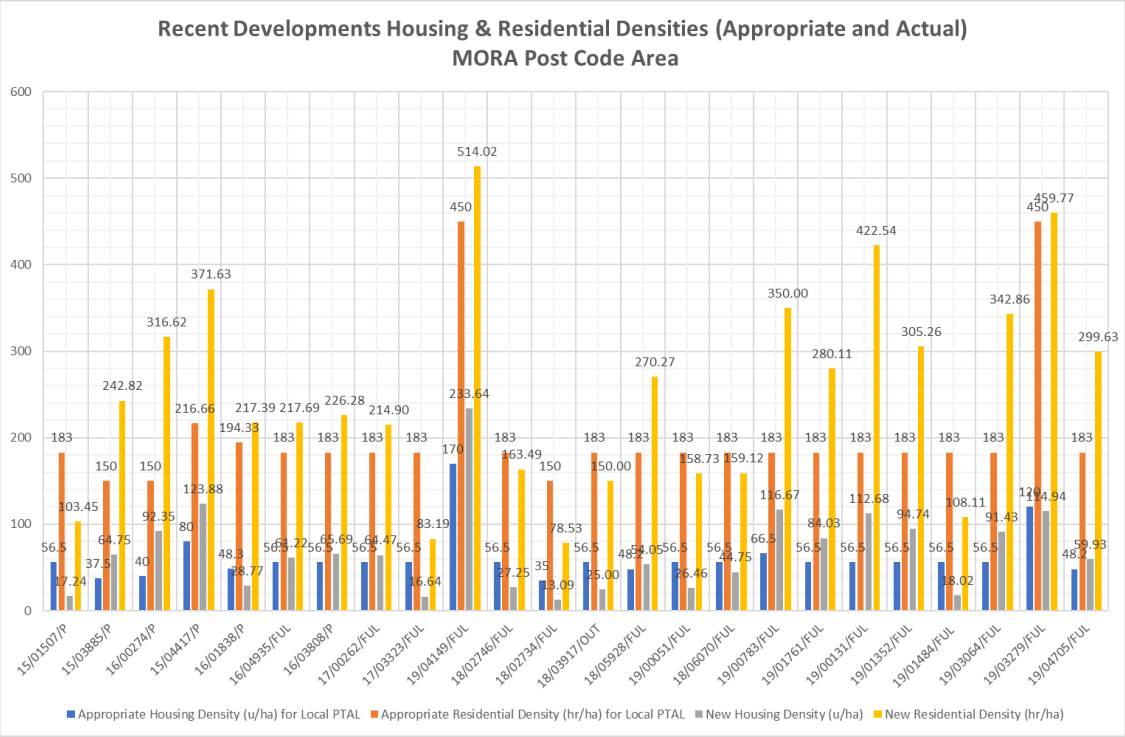


Illustration of excessive Housing and Residential Densities for Planning Applications in the MORA Post Code Area

This is the **current adopted London Plan Planning Policy**. The applicant has **NOT** provided any reasonable **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 1.3.55**.

We therefore request that this application be **refused** on grounds of inappropriate **exceptionally high Housing and Residential Densities** at this proposed site location and low **PTAL without any justification for doing so**, as defined by the **London Plan Policy 3.4 Optimising Housing Potential**, which would result in future occupants **NOT** having adequate accessibility to local **Services or Public Transport Infrastructure**.

Policy 3.5 Quality and Design of Housing Developments

Minimum Space Standards Table 3.3.

Table 3.3 - Minimum Space Standards for new Dwellings

Number of bedrooms	Number of bed spaces	Minimum GIA (m^2) 1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage (m^2)
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	

	Storage Space (Built-in)	Built-in Storage Table 3.3	GIA Offered	Table 3.3 GIA (3b5p3s)
Unit 1	Not Stated	2.5	Not Stated	99
Unit 2	Not Stated	2.5	Not Stated	99
Unit 3	Not Stated	2.5	Not Stated	99
Unit 4	Not Stated	2.5	Not Stated	99
Unit 5	Not Stated	2.5	Not Stated	99
Unit 6	Not Stated	2.5	Not Stated	99
Unit 7	Not Stated	2.5	Not Stated	99
Unit 8	Not Stated	2.5	Not Stated	99

The **Minimum Space standards** are given at **London Plan Policy 3.5 Table 3.3.**

The applicant has **NOT** given the **Minimum Gross Internal Area (GIA)** dimensions for the **three floors** of **any** of the dwellings. It cannot therefore be assumed that the proposal meets the **London Plan Policy for minimum space standards** as defined by the **London Plan Policy 3.5 Table 3.3** unless the full **GIA** dimensions are provided for each dwelling.

Similarly, the required minimum **in-built storage space** is not stated on the supplied plans and has **NOT** been listed in the applicant's **Design and Access Statements** thus it cannot be determined whether or not the proposed development meets this **minimum Built-In Storage** requirement.

We therefore request that this proposed development is refused and a more defined application proposal that fully meets the London Plan Policy 3.5 on minimum Space Standards providing full GIA dimensions and full built-in storage dimensions be provided for each dwelling, to at least meet the minimum requirement for future occupants of this proposed development, for the life of the development.

London Plan Policy 6.13 Parking

Policy

Strategic

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

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

Planning decisions

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

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

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

b provide parking for disabled people in line with Table 6.2

c meet the minimum cycle parking standards set out in Table 6.3

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

The proposed development locality has **PTAL of 1a** at base year and is forecast to remain at PTAL 1a until at least 2031.

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

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 **8** spaces for **40 occupants** giving a parking allocation of **0.2 spaces per occupant** at a locality of **PTAL 1a**.

See:

https://www.ons.gov.uk/peoplepopulationandcommunity/personalandhouseholdfinances/expenditure/datasets/percentageofhouseholdswithcarsbyincomegrouptenureandhouseholdcompositionuktablea47

	Bed Spaces (Occupants)	Car Parking	Disabled Parking	Likely Car Ownership
Unit 1	5	1	0	2
Unit 2	5	1	0	1
Unit 3	5	1	0	2
Unit 4	5	1	0	1
Unit 5	5	1	0	2
Unit 6	5	1	0	1
Unit 7	5	1	0	2
Unit 8	5	1	0	1
Total	40	8	0	12

Probable Car ownership for this proposed development

At the **appropriate** ranges of **Residential & Housing Densities at this suburban setting** at **PTAL 1a with an average of 5.0 hr/u at** $\boldsymbol{Residential\ Density \approx 183}$ **hr/ha and** $\boldsymbol{Housing\ Density \approx 48.2}$**units/ha the current London Plan Policy 6.13 Recommends up to 2 spaces per Unit thus requiring 16 car parking spaces** for this development proposal. This does not include any **commercial vehicles** owned by a resident for their employment or business activities.

Typical Car ownership for five occupant residential accommodation at **PTAL 1a** locality and poor public transport availability would realistically be about **12 cars**. 18 Ash Tree Close is **≈700m** Walking Distance from **Bywood Avenue Shopping Parade**; **≈530m** walking Distance from the nearest **367 Bus Stops**; **≈1700m** Walking Distance from nearest **Train Station** or **Tram Stop** at Elmers End.

Overspill parking would be within the Ash Tree Close North side as the South side has mainly drop kerbs for forecourt parking.

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	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	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/hr	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-site[3]
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.

The **Overspill car parking** would be in **Ash Tree Close** which is a narrow unclassified adopted Cul-de-sac, **44m** long and **5.07m** width with a **8.38m** Diameter turning Head and drop kerbs nearly the length of the road with cars parked on the forecourts of most dwellings which means very little available **on-street-parking** along **Ash Tree Close.**

There is no legislation to prevent car ownership or to restrict occupants from owning light vans for commercial or business activities which requires local parking overnight. We therefore object to this proposed development on grounds of inadequate parking provision of only 8 bays with allocation of only 0.20 bays per occupant, in a locality of PTAL 1a and at an area of local parking medium stress.

Recent piecemeal development in the MORA Post Code area has increased local residential population by approximately **550** (including other recent current proposals awaiting determination). This requires an increase in local **PTAL** to meet the increased **Housing** and **Residential Densities** in the locality as illustrated by the **histogram above** with trend line showing "The **cumulative** effects of **ignoring the Density ranges** given at **Policy 3.4.**"

Croydon Local Plan adopted Policies:

Croydon Plan DM10: Design and Character

Policy DM10: Design and character

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

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**.

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 or guidance for applicants on either **"SCALE, MASSING, or DENSITY".** Also, these characteristics **are required** as defined by the (new) **NPPF Para 16** which states:

NPPF (2018 & 2019)

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 at sub para e)

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

and at para 122 – **Achieving Appropriate Densities,**

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 3.4 Density Matrix Table 3.2** 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, **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.**

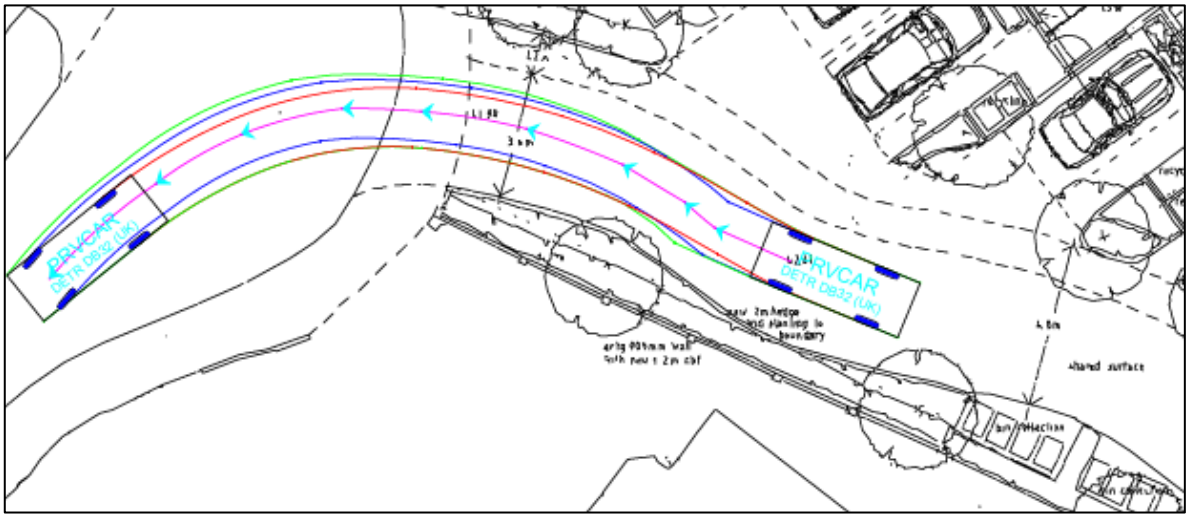
Policy DM10.2 states:

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.

This proposed development is a new **Cul-de-sac** on the end of an existing **Cul-de-sac**. The parking provision is situated on the **forecourts** fronting the **new access road** of the proposed development which is contrary to **Policy DM10.2**. **There is NO screening to shield the parking from the street scene as required by Policy DM10.2.**

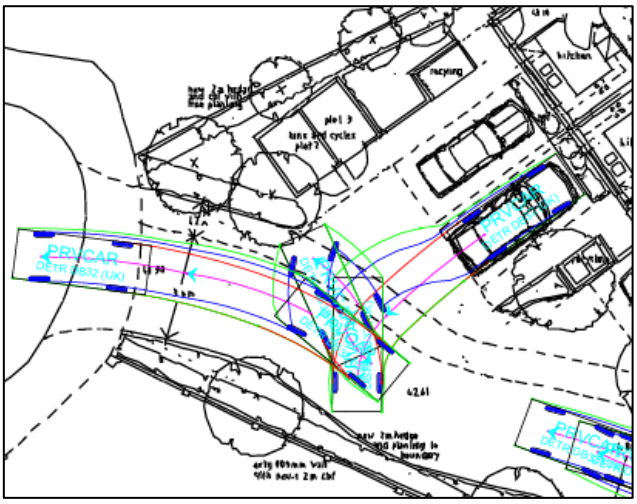
Swept Path Egress Diagrams:

The "Swept Path Diagrams" provided with the documents associated with the proposed development give an indication of the entrance to park in the Plot Bays in a forward gear and also the swept paths necessary to exit the plot bays and change into a forward gear to exit safely across the access footpath and drop-kerb into Ash Tree Close. An analysis of these swept path manoeuvres are given below.

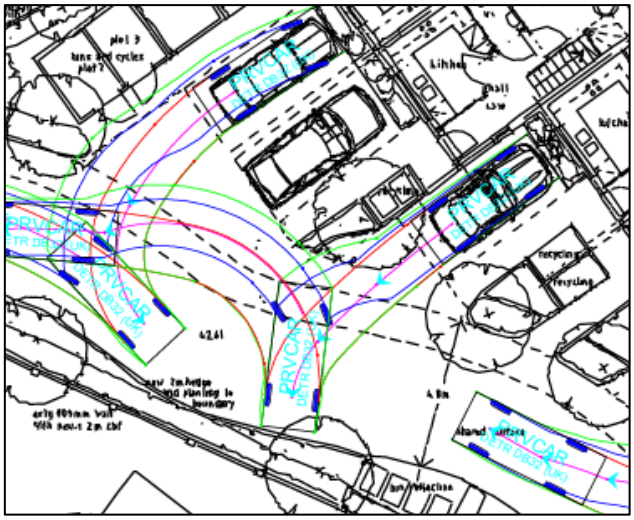


Any vehicle (delivery vehicle etc) which accesses the new driveway in a forward gear and finds all parking bays full, has **NO** turning head to allow exiting in a forward gear across the footpath of **Ash Tree Close.** This results in an **extreme safety hazard** to possible pedestrians using the footpath.

The only solution is to Reverse into the driveway but that might not be considered by the driver before actually entering the driveway and once entered in a forward direction, the driver would have to **reverse** out and may not have a passenger to assist in the manoeuvre **to check it is clear and safe to reverse** out across the footpath of **Ash Tree Close.**

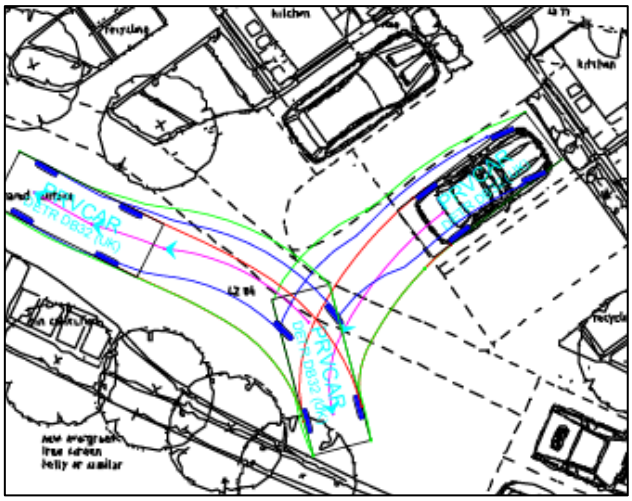


Plot 2 Parking Bay Egress Swept path diagram indicates the difficulty exiting the parking bay in reverse gear in order to exit the driveway in a forward gear into Ash Tree Close roadway.
It is not clear how many forward and reverse shuttles are required to allow clear exit in a forward gear but from the swept path diagrams it requires quite a few. It is feasible that a driver would reverse out over the footpath (extremely dangerous) rather than attempt the manoeuvre as depicted in the swept path diagrams.



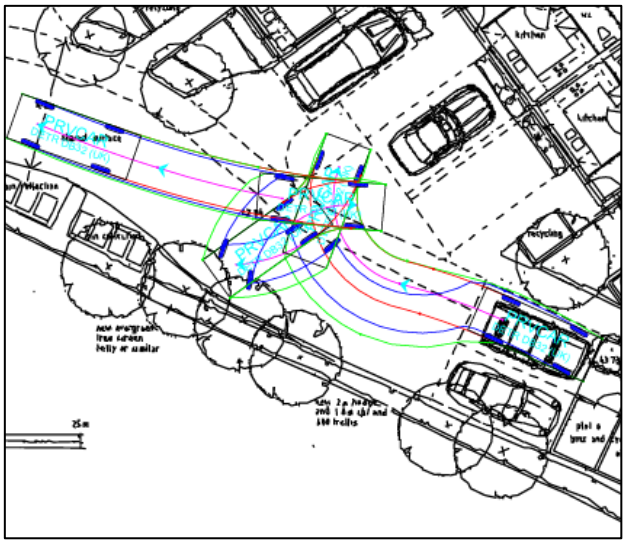
Plot 3 Parking Bay Egress Swept path shows that it is necessary to encroach over the **curtilage** of **Plot 2 frontage** and the **footpath** in front of **Plot 2** in order to exit in a forward gear – after driving into the parking bay in a forward direction.

This is not a manoeuvre which would be acceptable to the future owners or occupiers of **Plot 2** and could conceivably be a cause of future conflict between owners or occupiers and should therefore be avoided as a planning issue for the life of the development.



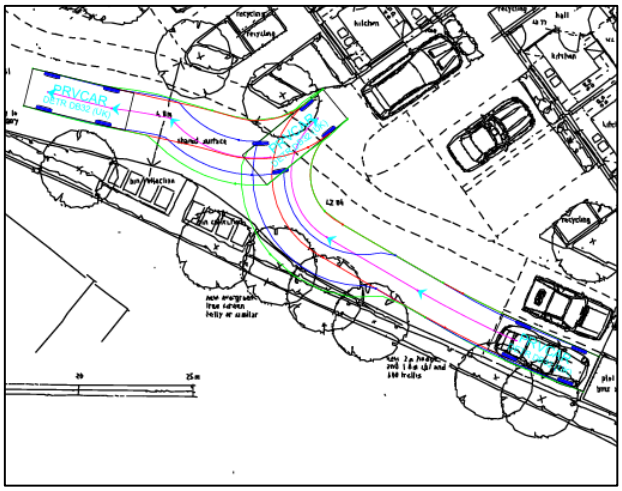
Plot 5 Parking Bay Egress Swept path shows that it is necessary to mount the new footpath to exit in a forward gear and would slightly encroach on the footpath of **Plot 4**.

This is not a manoeuvre which would be acceptable to the future owners or occupiers of **Plot 4** and could conceivably be a cause of future conflict between owners or occupiers and should therefore be avoided as a planning issue for the life of the development.



Plot 7 Parking Bay Egress Swept path shows that it is necessary to mount the new footpath and forecourt which are within the **curtilage** of **Plot 4 & 5** in order to have numerous difficult shuffles, backwards and forwards before exiting in a forward gear.

This is **not** a manoeuvre which is likely to be acceptable to the future owners or occupiers of **Plots 4 & 5** and could conceivably be a cause of future conflict between owners or occupiers and should therefore be avoided as a planning issue for the life of the development.



Plot 8 Egress swept path similarly shows that it is necessary to mount the new footpath and forecourt within the **curtilage** of **Plot 4** in order to exit in a forward gear.

This is **not** a manoeuvre which is likely to be acceptable to the future owners or occupiers of **Plot 4** and could conceivably be a cause of future conflict between owners or occupiers and should therefore be avoided as a planning issue for the life of the development.

It is noted that there are, *very conveniently*, **NO** swept path **Egress** provided for **Plot 6 parking** as due to the closeness of the parking bay to the driveway and footpath, it is **extremely** unlikely that the **swept path diagrams** would show an easy manoeuvre to exit in a **forward gear**. There would be **extreme difficulty** with the required **manoeuvres** – from a visual assessment it is likely to be **nigh impossible** to extricate a vehicle **parked in a forward direction**, to actually exit the driveway in a **forward gear**. It is suggested that the **Case Officer** requests an **additional swept path diagram** for any vehicle **egress** from **Plot 6 Parking Bay** in order to exit the driveway in a forward gear after being parked in a forward direction.

Car parking for **Plots 1 and 4** are the **only parking positions** which would have a straight forward manoeuvre **within their curtilage** to exit the parking Bay in a forward gear without excessive difficulty, or encroaching on other plots curtilage.

These parking arrangements are an afterthought and have not been considered from the outset of the design process. We therefore object to this proposed development on grounds of totally inappropriate parking provision for access and egress in a safe and correct manageable manoeuvrability operation for all Parking Plots and thus non-compliant to Policy DM10.2.

Croydon Local Plan Policy

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

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;

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.

The proposed development does NOT specify the allocation of **amenity space** for each dwelling which each has occupation of **5 persons** thus requiring a minimum of **7m^2** for each dwelling. Although the plans suggest that this allocation is likely to be provided the actual provision is **NOT** specified on the supplied drawings or in **Part 1 or Part 2** of the **Design and Access Statements** and therefore is **unacceptable.**

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

They do not result in significant loss of existing sunlight or daylight levels of adjoining occupiers.

Supplementary Planning Guidance (SPD2)

It is understood that the adjacent property at 20 Ash Tree Close ground floor adjacent rear elevation room is a kitchen which is **NOT** a habitable Room and as such the 45° Vertical Rule does NOT apply.

The horizontal 45° Rule projection does not intersect the existing dwellings or the proposed development and therefore this rule also does not apply to this proposed development.

The **Northwest Elevation** toward 20 Ash Tree Close has two ground floor windows one of which is a mere **≈5m** from **20 Ash Tree Close** flank wall and the other overlooks the rear garden of **20 Ash Tree Close** which both provide **invasion of privacy and overlooking. We are not sure whether there are windows in the flank wall of 20 Ash Tree Close, but if so then there would be extreme overlooking and invasion of privacy.**

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

e. 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.**

All local surrounding **roof forms** in **Ash Tree Close** are **hip roofs** whereas the proposed development has **gabled designed roofs forms** which are **not sympathetic** with the **local context** and thus **non-compliant** to Policy **DM10.7 e).**

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**;

c. Ensure lighting schemes do not cause glare and light pollution.

Illustration of proposed development.

DM10.10 When considering the layout of new development, the council will support proposals that minimise the amount of blank and inactive frontages, increase the amount of **natural surveillance and avoid dark and secluded areas.**

There is no **new architectural street lighting** for the new **access road** shown on the supplied plans which indicates a likely **dark and secluded environment** during hours of darkness and thus non-compliant to **Policy DM10.9 c)** or **DM10.10.**

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.

The general requirement for **Household Refuse** Storage is for **3 Wheelie Bins** (Four if Garden Waste is required) for **Landfill, Plastics** & **Paper** plus small **food waste** and possibly **Garden Waste.** The **Refuse & Recycling Storage** for each of the proposed dwellings do not seem to be adequate to cope with this general requirement.

In addition, many of the **Bin Storages** are in **front of the development building line** and not integral within the **curtilage of the property to which it is designated** and therefore the overall design is not as required by the policy. The general observation is that the **Refuse and Recycling storage** has not been **integrated** with the **design concept** but have been added as an afterthought and without any strategic design requirement and **should therefore be refused.**

Plot 1 Refuse & Recycling

The Refuse & Recycling Bin Storage is in the rear garden of **Unit 1** but insufficient capacity. The recycling Bin Storage is separate on the frontage within the curtilage of **Unit 1 but in front of the building line.**

Plot 2 & 3 Refuse & Recycling

Also, the frontage of **Unit 1** has an allocation for **Units 2 & 3 Bins** and **Cycle Store**. These are in front of the building line of this proposed development and in an **inappropriate position** within the **curtilage of Plot 1** for **Units 2 & 3** and are **Non-compliant** to **Policy DM13.1 a). The future owners or occupiers of Plot 1 would be affronted by this arrangement.**

Plots 2, 3 & 4 Recycling

Plots 2, 3 & 4 Recycling are on the forecourts of each dwelling – in front of the building Line and **NOT** within the building envelope and **Non-compliant** to **Policy DM13.1 a).**

Plots 7 & 8 Recycling & cycle sheds

Plots 7 & 8 Recycling and Cycle sheds are either on the respective forecourts or behind the Car Parking bays for Plot 7 & 8. Also, NOT within the building envelope and therefore **Non-compliant** to **Policy DM13.1 a).**

Generally, the Refuse, Recycling storage and Cycle sheds are all an afterthought and situated at various locations, squeezed in within the site parameters without an overall strategy and thus non-compliant to the Policies DM13 or the spirit of the policies.

Policy DM23: Development and construction

The Council will promote high standards of development and construction throughout the borough by:

a. Ensuring that future development, that may be liable to cause or be affected by pollution through air, noise, dust, or vibration, will not be detrimental to the health, safety and amenity of users of the site or surrounding land;

b. Ensuring that developments are air quality neutral and do not lead to further deterioration of existing poor air quality;

c. Ensuring mitigation measures are put in place to reduce the adverse impacts to acceptable levels. Where necessary, the Council will set planning conditions to reduce the impact on adjacent land uses to acceptable levels, relative to ambient noise levels and the character of the locality; and

Encouraging the use of sustainable and innovative construction materials and techniques in developments.

If the Case Officer is inadvisably minded to approve this development proposal, the limited access and parking stress in Ash Tree Close will result in difficult complications during the demolition, site clearance and construction phases of this proposed development.

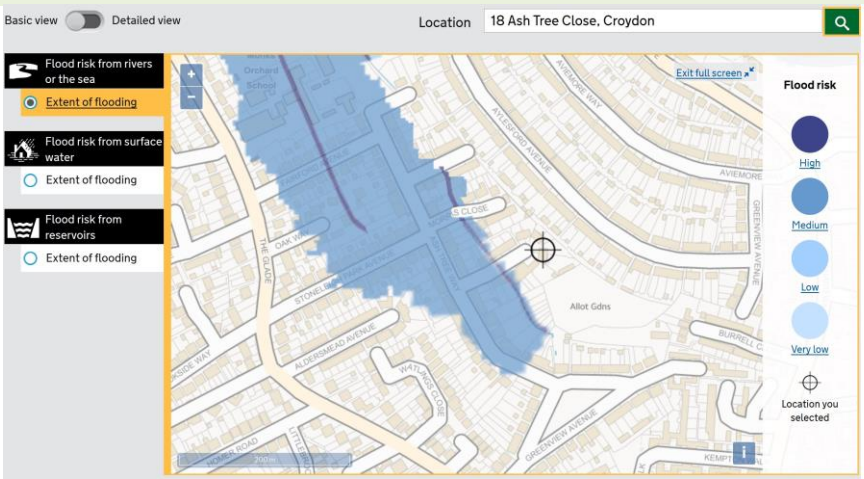
Building workers' private cars would cause significant obstruction within the local road network due to on-street parking limitations and the removal of demolition and delivery of construction materials will cause significant disruption to local residents.
This disruption and inconvenience would need to be considered by planning officers prior to any determination and if ill-advised minded to approve the proposal should be the subject of enforceable mitigation conditions of development.

Policy DM25: Sustainable Drainage Systems and reducing Flood Risk

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

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

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



Extent of Flood Risk at proposed development site

If this application went ahead then there is the possibility of more trees being felled. The water currently consumed by the trees acts as nature's way of controlling the water table level.

As there are real problems in the lower end of Ash Tree Close and Ash Tree Way, any future development planning at this locality would need to take surface water flooding seriously into consideration.

The location of this proposed development is extremely close to flood risk from the "chaffinch brook" as shown on the above Environment Agency Flood Maps (extent of flooding) and therefore would exacerbate the existing potential for flood risk in this locality.
The presence of additional development and loss of trees in the locality would create further flood risk to surrounding properties in Ash Tree Way and Ash Tree Close which should be avoided as required of Policy DM25.1 a), Policy DM25.1 d) and Policy DM25.2.

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

Policy: Shirley (Place Specific Policies).

Homes

11.200 An area of sustainable growth of the suburbs with some opportunity for windfall sites will see growth mainly confined to infilling with dispersed integration of new homes **respecting existing residential character and local distinctiveness.**

Character, Heritage and Design

11.202 New development will be **sensitive to the existing residential character** and the wooded hillsides of the Place referring to the Borough Character Appraisal to **inform design quality**. Public realm improvements will focus on the Local Centre. Any building and conversions should be of a high standard of design to **ensure the character** of the Centre is respected.

Transport

11.205 With **improved access and links where possible**, the existing connectivity and **good public transport of Shirley will be maintained**. The community ***will*** enjoy better quality, ***more frequent*** and ***reliable*** bus services connecting with Croydon Metropolitan Centre. Travel plans will look to *ease congestion at peak times* in the Local Centres by encouraging walking, cycling or public transport especially for school journeys. ***(Not actually so!)***

The proposed development is an overdevelopment for the locality and does **NOT respect the existing residential and housing densities** and therefore, is non-compliant to **Policy: Shirley Place *Homes* para 11.200 & *Character, Heritage and Design* para 11.202.**

There has been "***absolutely no improved access or transport links"*** *in* ***Shirley*** with increased residential occupancy of 550 persons resulting from recent in-fill and redevelopment in the MORA Post Code area and therefore the policy **Shirley Place *Transport* para 11.205 has NOT been fulfilled.**

The siting and layout as a Cul-de sac on the end of an existing Cul-de-sac would not respect or improve the existing pattern of buildings and the spaces between them and would appear a dominant and extremely poorly designed, out of character element in the street scene within the "Shirley Place" description.

The development would be detrimental to the amenities of the occupiers of the adjoining properties by reason of loss of light, loss of outlook, visual intrusion and overbearing impact.

The proposed design concept has not been thought through but has been squeezed into the available site area to get the maximum number of dwellings at an exceptionally High Residential and Housing Density for this suburban locality at a low PTAL of 1. The lack of any compliance to Minimum Space Standards, the inadequate and inappropriate parking provision, the illogical distribution of Refuse and Recycling provision, the lack of frontage lighting and the loss of trees which compromises the areas probability for surface water flooding, all contribute to significant reasons for a refusal of this proposed development.
This planning proposal design concept is flawed and should therefore be refused.

Please list our representation on the on-line public register as **Monks Orchard Residents' Association (Objects)** such that our members and local residents are aware of MORA's objection to this proposed development.

Please inform us at planning@mo-ra.co of your recommendation or decision in due course.

Yours sincerely

[redacted]

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

[redacted]

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

Cc:	
Sarah Jones MP	Croydon Central
Mr. Pete Smith	Head of Development Management (LPA)
Cllr. Sue Bennet	Shirley North Ward Councillor
Cllr. Richard Chatterjee	Shirley North Ward Councillor
Cllr. Gareth Streeter	Shirley North Ward Councillor
Bcc:	
MORA	Executive Committee
Local Residents	
Interested Parties	