

To: Mr Russell Smith - Case Officer  
Development Management  
Development and Environment  
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Bernard Weatherill House  
8 Mint Walk  
Croydon  
CR0 1EA

**Monks Orchard Residents' Association  
Planning**

4<sup>th</sup> February 2020

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<b>Reference</b>	<b>20/00092/FUL</b>
<b>Application Received</b>	<b>Thu 09 Jan 2020</b>
<b>Application Validated</b>	<b>Mon 13 Jan 2020</b>
<b>Address</b>	<b>67 Orchard Avenue Croydon CR0 7NE</b>
<b>Proposal</b>	<b>Demolition of existing garage; erection of a two-storey side extension, two storey rear extension, loft conversion with roof lights in the front roof slope and dormers in the rear roof slope, the construction of rear basement with terrace area and external staircase and alterations to the front vehicular access and boundary treatment. Conversion of single dwelling into 6 flats - 3 x 1 bedroom flat and 3 x 2 bedroom flat; provision of car parking, refuse and recycling store, soft landscaping and new vehicular access onto Woodland Way, with hardstanding area.</b>
<b>Case Officer</b>	<b>Russell Smith</b>
<b>Consultation Expiry Date</b>	<b>Sun 16 Feb 2020</b>

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Dear Mr Smith

Please accept this formal letter of objection to the proposal for Demolition of existing garage; erection of a two storey side extension, two storey rear extension, loft conversion with roof lights in the front roof slope and dormers in the rear roof slope, the construction of rear basement with terrace area and external staircase and alterations to the front vehicular access and boundary treatment. Conversion of single dwelling into 6 flats - 3 x 1 bedroom flat and 3 x 2 bedroom flat; provision of car parking, refuse and recycling store, soft landscaping and new vehicular access onto Woodland Way, with hardstanding area at 67 Orchard Avenue, CR0 7NE.

We should categorically state that we are **NOT** against development or re-development in this area, but that we robustly object to developments that **do not reflect the character of the area** or meet the objectives as defined in the current adopted **Croydon Plan, The London Plan, the emerging London Plan and the NPPF** as they relate to the “**Shirley Place.**”

## Parameters Relevant to the proposal:

67 Orchard Avenue		Ref: 20/00092/FUL		Existing Dwellings		1							
SiteArea		0.07 ha		Existing Bedrooms		4							
	Floor	Bedrooms	Bed-Spaces	Habitable Rooms (***)	GIA Provided (m <sup>2</sup> )	Minimum GIA Table 3.1 New LP (m <sup>2</sup> )	Kitchen Dining Living (m <sup>2</sup> )	In-Built Storage Offered (m <sup>2</sup> )	Built-in Storage Required Table 3.1 New LP (m <sup>2</sup> )	Private Amenity Space Provided (m <sup>2</sup> )	Private Amenity Space Required (m <sup>2</sup> )	GIA + Private Amenity Space (**)	
Flat 1	Basement	1	2	3	51.9	50	24.3	1.2	1.5	N/A (*)	6	56	
Flat 2	Ground	1	2	3	52.1	50	25.3	1.9	1.5	Zero	6	56	
Flat 3	Ground	2	3	4	61.7	61	25.8	1.5	2.0	Zero	7	68	
Flat 4	First	2	3	4	68.4	61	29.4	nil	2.0	3.6	7	68	
Flat 5	First	1	2	3	50.0	50	24.0	1.6	1.5	3.6	6	56	
Flat 6	Second	2	4	4	83.5	70	27.4	2.5	2.0	Zero	7	77	
<b>Totals</b>		<b>9</b>	<b>16</b>	<b>21</b>	<b>367.6</b>			<b>8.7</b>			<b>39</b>	<b>381</b>	
<b>Residential Density</b>		<b>300.00</b> hr/ha		<b>PTAL Required at Residential Density of 300 hr/ha =</b>						<b>5.33</b>			
<b>Housing Density</b>		<b>85.71</b> u/ha		<b>PTAL Required at Housing Density of 85.71 u/hr =</b>						<b>5.02</b>			
<b>Average hr/unit</b>		<b>3.50</b> hr/u		Lightwell Amenity Area (*)		Area NOT specified							
<b>Residential Density</b>		<b>228.57</b> bed-spaces/ha		Private Amenity Space (**)		GIA + Private Amenity Space; <b>Policy DM10 para 6.76</b>							
(***) Kitchen/Dining/Living Open Plan configuration - considered as two habitable Rooms (Kitchen a non-habitable room)													
<b>Infrastructure:</b>			Numerically		<b>Car Parking Spaces</b>			5					
PTAL	2011	1b	1.33	Parking per occupant			0.3125 spaces/occupant						
PTAL	2031	1b	1.33	Parking per Dwelling			0.8333 Per Dwelling						

**Croydon Plan Policy DM10 para 6.76:** In exceptional circumstances where site constraints make it impossible to provide **private outdoor space for all dwellings**, indoor private amenity space may help to meet policy requirements. The area provided should be **equivalent to the private outdoor amenity space requirement and this area added to the minimum Gross Internal Area.**

## New London Plan

Table 3.1 Minimum internal space Standards for new dwellings <sup>25</sup>					
Minimum gross internal floor areas and storage (Square Metres)					
	Number of Bed spaces (persons (p))	1 Storey dwellings	2 Storey dwellings	3 Storey dwellings	Built-in storage
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	
4b	5p	90	97	103	3
	6p	99	106	112	

TfL Webcat	Accessing Transport Connectivity in London		
Setting	Public Transport Accessibility Level (PTAL)		
	0 to 1	2 to 3	4 to 6
Suburban	150-200 hr/ha	150-250 hr/ha	200-350 hr/ha <b>(300.00 hr/ha)</b>
3.8-4.6 hr/unit	35-55 u/ha	35-65 u/ha	45-90 u/ha
3.1-3.7 hr/unit <b>(3.5 hr/unit)</b>	40-65 u/ha	40-80 u/ha	55-115 u/ha <b>(85.71 u/ha)</b>
2.7-3.0 hr/unit	50-75 u/ha	50-95 u/ha	70-130 u/ha

**PTAL required @ 300 hr/ha**  
 $300 = \left(\frac{350-200}{6-4}\right)x - 100 : x = PTAL \approx 5.33$

**PTAL required @ 85.71 units/ha**  
 $85.71 = \left(\frac{115-55}{6-4}\right)x - 65 : x = PTAL \approx 5.02$

## Planning History:

Reference	19/04328/HSE
Application Received	Wed 11 Sep 2019
Application Validated	Thu 26 Sep 2019
Address	67 Orchard Avenue Croydon CR0 7NE

Proposal	Erection of two storey side extension, two storey rear extension, loft conversion with roof lights in the front roof slope and dormers in the rear roof slope, and the construction of rear basement with terrace area and external staircase.
Status	Decided
Decision	Permission Granted
Decision Issued Date	Thu 28 Nov 2019
Reference	17/00900/FUL
Application Received	Wed 22 Feb 2017
Application Validated	Tue 28 Mar 2017
Address	67 Orchard Avenue Croydon CR0 7NE
Proposal	Demolition of the existing building. Erection of a terrace of 3 three-bedroom houses with accommodation in the roof-space and formation of vehicular accesses onto Orchard Avenue. Erection of a detached two-bedroom bungalow at the rear and formation of vehicular access onto Woodland Way. Provision of associated parking, cycle and refuse storage for the whole development
Status	Decided
Decision	Permission Refused
Decision Issued Date	Thu 08 Jun 2017
Appeal Status	Appeal decided appeal is dismissed – 15 <sup>th</sup> May 2018
Reference	16/04708/FUL
Application Received	Mon 12 Sep 2016
Application Validated	Wed 14 Sep 2016
Address	67 Orchard Avenue Croydon CR0 7NE
Proposal	Demolition of existing building and erection of 3 three storey three-bedroom townhouses fronting Orchard Avenue and 1 two-bedroom bungalow fronting Woodland Way. Formation of vehicular accesses and provision of associated parking
Status	Decided
Decision	Permission Refused
Decision Issued Date	Fri 09 Dec 2016

**From the forgoing analysis of the proposal, it can be clearly demonstrated that this proposal fails to meet minimum accommodation standards as defined by the current adopted and emerging London Plan Policies <sup>[1]</sup> which if the proposal were to be approved, would be extremely detrimental for future occupiers for the life of the development.**

**Reasons for Refusals:**

**Flat 1** Failure to meet the minimum required “**built-In Storage**” requirement as defined by the adopted **London Plan Policy 3.5 Table 3.3** or the emerging **London Plan Policy [D4 Housing quality and standards](#)** for the life of the development.

[1] Draft London Plan – Consolidated Suggested Changes Version July 2019

- Failure to meet the requirement that **Dwellings must provide at least the gross internal floor area and built-in storage area as set out in Table 3.1.**

**Flat 2** Failure to meet the minimum required “built-In” Storage requirement as defined by the adopted **London Plan Policy 3.5 Table 3.3** or the emerging **London Plan Policy D4 Housing quality and standards** for the life of the development.

- Failure to meet the requirement that **Dwellings must provide at least the gross internal floor area and built-in storage area as set out in Table 3.1.**
- **Failure to provide any private amenity space or to increase the Gross Internal Area (GIA) to compensate in (exceptional circumstances) for lack of Private Amenity Space (Croydon Plan Policy paragraph 6.76).**

**Flat 3** Failure to meet the minimum required “built-In” Storage requirement as defined by the adopted **London Plan Policy 3.5 Table 3.3** or the emerging **London Plan Policy D4 Housing quality and standards** for the life of the development.

- Failure to meet the requirement that **Dwellings must provide at least the gross internal floor area and built-in storage area as set out in Table 3.1.**
- **Failure to provide any private amenity space or to increase the Gross Internal Area to compensate (Croydon Plan Policy 6.76) for lack of Private Amenity Space.**

**Flat 4** Failure to meet the minimum required “built-In” Storage requirement as defined by the adopted **London Plan Policy 3.5 Table 3.3** or the emerging **London Plan Policy D4 Housing quality and standards** for the life of the development.

- Failure to meet the requirement that **Dwellings must provide at least the gross internal floor area and built-in storage area as set out in Table 3.1.**
- **Failure to provide any private amenity space or to increase the Gross Internal Area to compensate (Croydon Plan Policy 6.76) for lack of Private Amenity Space.**

**Flat 5** Failure to meet the minimum required “built-In” Storage requirement as defined by the adopted **London Plan Policy 3.5 Table 3.3** or the emerging **London Plan Policy D4 Housing quality and standards** for the life of the development.

- Failure to meet the requirement that **Dwellings must provide at least the gross internal floor area and built-in storage area as set out in Table 3.1.**
- **Failure to provide any private amenity space or to increase the Gross Internal Area to compensate (Croydon Plan Policy 6.76) for lack of Private Amenity Space.**

**Flat 6** Failure to meet the minimum required “built-In” Storage requirement as defined by the adopted **London Plan Policy 3.5 Table 3.3** or the emerging **London Plan Policy D4 Housing quality and standards** for the life of the development.

- Failure to meet the requirement that **Dwellings must provide at least the gross internal floor area and built-in storage area as set out in Table 3.1.**

### **Sustainability Densities:**

The proposed **Residential and Housing Densities** at **300hr/ha & 85.71units/ha** respectively is excessive for a **PTAL of 1b** as defined by the **Accessibility Index Range** by **Transport for London (WebCAT)**.

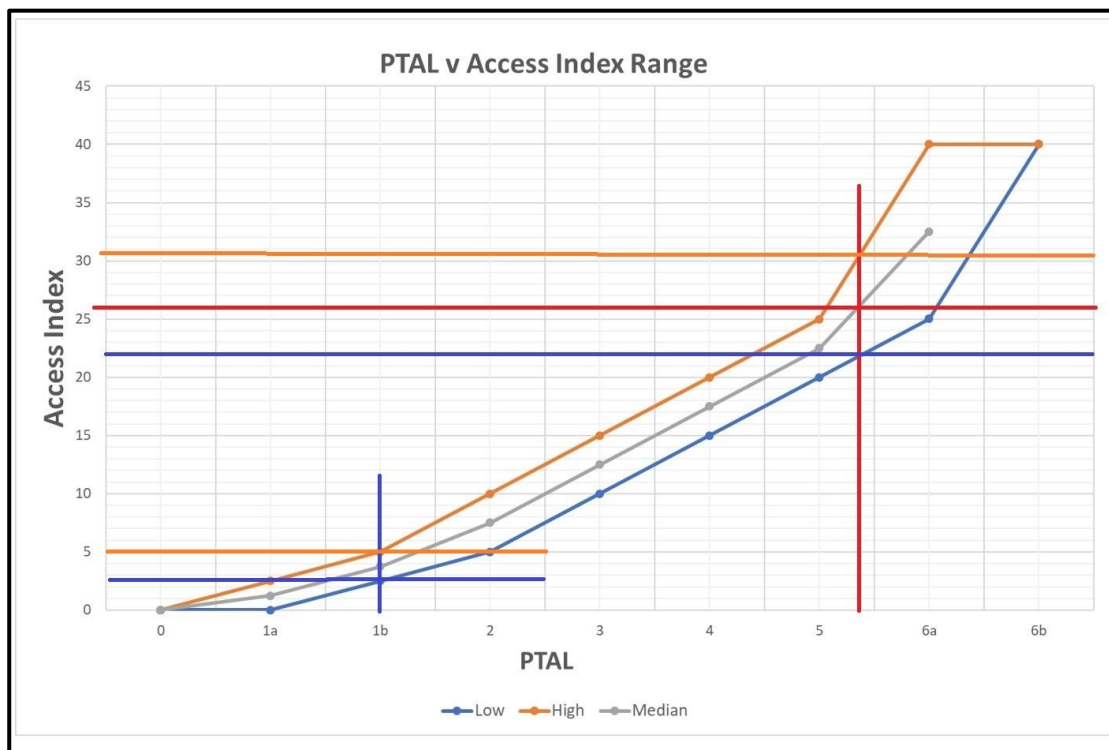
At a **Residential Density** of **300hr/ha** in a **suburban** setting would require a **PTAL of 5.33** and an **Access Index of ~25.2**.

At a **Housing Density** of **85.71 Units/ha** in a **suburban** setting would require a **PTAL of 5.02** and an **Access Index of 20.01 to 25.0**.

Both, significantly **exceed** the current or planned **PTAL of 1b**, for an **Access Index Range of 1b** at **Access Index of 2.51 to 5.0**.

PTAL	Access Index range	Map colour
0 (worst)	0	
1a	0.01 – 2.50	
1b	2.51 – 5.0	
2	5.01 – 10.0	
3	10.01 – 15.0	
4	15.01 – 20.0	
5	20.01 – 25.0	
6a	25.01 – 40.0	
6b (best)	40.01+	

Table 2.2: Conversion of the Access Index to PTAL



The **Transport for London (TfL) Access Index Range** for the location at **PTAL 1b** is in the **range 2.5 to 5.0** whereas the actual **Access Index Range** for this proposal at **PTAL 5.33** requires a **TfL Access Index Range of 22 to 31!** This is ample proof that the Local Public Transport Infrastructure is **inadequate** and **unsustainable** to support this proposal at this location as measured by the only available parameters as defined by the **TfL WebCAT**.

## Policy D1A Infrastructure requirements for sustainable densities

A The density of development proposals should:

- 1) consider, and be linked to, the provision of future planned levels of infrastructure rather than existing levels,
- 2) be proportionate to the site's connectivity and accessibility by walking, cycling, and public transport to jobs and services (including both PTAL and access to local services <sup>22A</sup>).

B Where there is currently insufficient capacity of **existing infrastructure to support proposed densities** (including the impact of **cumulative development**), boroughs should work with applicants and infrastructure providers to ensure that sufficient capacity will exist at the appropriate time. This may mean, that **if the development is contingent on the provision of new infrastructure, including public transport services, it will be appropriate that the development is phased accordingly.**

C When a proposed development is acceptable in terms of use, scale and massing, given the surrounding built form, uses and character, but it **exceeds the capacity identified in a site allocation** or the site is not allocated, and the borough considers the planned **infrastructure capacity will be exceeded, additional infrastructure proportionate to the development should be delivered through the development.** This will be identified through **an infrastructure assessment** during the **planning application process**, which will have regard to the local infrastructure delivery plan or programme, and the CIL contribution that the development will make. Where additional required infrastructure cannot be delivered, the scale of the development should be reconsidered to reflect the capacity of current or future planned supporting infrastructure.

### **Implementing the London Plan Policy D1A**

#### **Policy D1A**

**Policy A1.** The future Planned level of Infrastructure should be linked to the future level of Infrastructure – The only Infrastructure level currently established is the Public Transport Accessibility Level, which is forecast by TfL to be at PTAL 1b up to 2031.

**Policy A2.** The proposal should be proportionate to the site's connectivity and accessibility and by definition the Access Index Range, as shown above clearly shows that the proposal does NOT meet that requirement.

**Policy B.** It is clear there is currently insufficient capacity of existing infrastructure to support the proposed densities (including the impact of cumulative development) and that the development is contingent on the provision of new infrastructure, including public transport services, it will be appropriate that if approved, the development is phased accordingly.

**Policy C.** As the proposal exceeds the capacity identified for this site allocation and the planned infrastructure capacity will be exceeded, additional infrastructure proportionate to the development should be delivered through the development. This should be identified through an "infrastructure assessment" during the planning application process prior to a determination.



**5.4.5** Formal play provision should normally be made **on-site** and provide at least **10square metres per child** to address **child occupancy and play space requirements** generated by a development proposal. Supplementary Planning Guidance will provide additional detail on the application of this benchmark and other implementation issues. Where development is to be phased, there should be an early implementation of **play space**.

The proposal would provide possibly, up to 9 bed-spaces for children which would require a maximum of 90m<sup>2</sup> play space area provided and there is no allocation provided and as such this application should be refused.

## Summary

Dwellings once approved, will provide living accommodation for future occupants for a significant number of years – the life of the development – and therefore its approval should **ensure suitable accommodation standards for all future occupiers for the lifetime of the development.**

This proposed development **fails to fully meet** those **minimum space standards** and should therefore be **refused** to allow the applicant to re-design the proposal to at least meet (and preferably exceed) those **minimum space standards** which are set to afford future occupants appropriate living conditions for the lifetime of the development.

The existing and **future planned Infrastructure** has **NOT been evaluated in accordance with the emerging London Plan Policy D1A** and as such this proposed development is **unsustainable** when evaluated using currently available **TfL analysis information** as clearly set out above with respect to **Public Transport Accessibility Level – PTAL** and should therefore be refused in accordance with the Policy.

We therefore **strongly urge the LPA to robustly refuse this application** on the forgoing grounds as listed, **including any other relevant policies that we may have overlooked.**

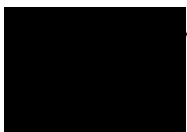
Please register our submission on the on-line comments for this application as **Monks Orchard Residents' Association (Objects)**.

Please inform us of your recommendation and 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	Head of Development Management (LPA)
Sarah Jones MP	Croydon Central
Steve O'Connell	GLA Member (Croydon & Sutton)
Cllr. Gareth Streeter	Shirley North Ward Councillor
Cllr. Richard Chatterjee	Shirley North Ward Councillor
Cllr. Sue Bennett	Shirley North Ward Councillor

**Bcc:**

MORA Executive Committee  
Local effected Residents