

To: Mr Joe Sales - Case Officer
Development Management
Development and Environment
6th Floor
Bernard Weatherill House
8 Mint Walk
Croydon
CR0 1EA

**Monks Orchard Residents' Association
Planning**

26th February 2020

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Reference	20/00356/FUL
Application Received	Sat 25 Jan 2020
Application Validated	Sat 25 Jan 2020
Address	67A Orchard Avenue Croydon CR0 7NE
Proposal	Front extension and part two storey, part single storey side extension and associated alterations for the conversion of the house into two flats
Status	Awaiting decision
Case Officer	Joe Sales
Consultation Expiry Date	Thu 27 Feb 2020

Dear Mr Sales

Please accept this formal letter of objection to the proposal for Front extension and part two storey, part single storey side extension and associated alterations for the conversion of the house into two flats at 67A Orchard Avenue Croydon CR0 7NE

Parameters Relevant to the proposal:

67a Orchard Avenue	Ref: 20/00356/FUL	Existing Housing Density	41.49	u/ha	Existing Habitable Rooms	5						
Site Area = 241m ²	0.0241 ha	Existing Residential Density	207.47	hr/ha	Existing Bedrooms	3						
Floor	Bedrooms	Bed-Spaces	Habitable Rooms (***)	GIA Provided (m ²)	Minimum GIA Table 3.1 New LP (m ²)	Kitchen Dining Living (m ²)	In-Built Storage Offered (m ²)	Built-in Storage Required Table 3.1 New LP (m ²)	Private Amenity Space Provided (m ²)	Private Amenity Space Required (m ²)	GIA + Private Amenity Space (**)	
Flat 1	Ground	3	6	5	100	86	50	2.68	2.5	Not Stated	9	95
Flat 2	First	2	3	5	65	61	13	1.5	1.5	Not Stated	6	67
Totals		5	9	10	165	147		4.18	4.0	Acceptable	15	162
Residential Density	414.94 hr/ha			PTAL Required at Residential Density of 414.94 hr/ha =						6.866		
Housing Density	82.99 u/ha			PTAL Required at Housing Density of 82.99 u/hr =						4.933		
Average hr/uint	5.00 hr/u			Lightwell Amenity Area (*)				Area NOT specified				
Residential Density	373.44 bed-spaces/ha			Private Amenity Space (**)				GIA + Private Amenity Space; Policy DM10 para 6.76				
(***)Dining/Living Open Plan configuration - considered as two habitable Rooms (Kitchen a non-habitable room)												
Infrastructure:	Numerically			Car Parking Spaces				5				
PTAL	2011	1b	1.33	Parking per occupant				0.56		spaces/occupant		
PTAL	2031	1b	1.33	Parking per Dwelling				0.83		Per Dwelling		

London Plan Minimum Space Standards TfL WebCAT Access Requirements

		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	

Setting	Public Transport Accessibility Level (PTAL)		
	0 to 1 (1b = 1.33)	2 to 3	4 to 6
Suburban	150-200 hr/ha (216.5 hr/ha)	150-250 hr/ha (207.47 hr/ha)	200-350 hr/ha (414.94 hr/ha)
3.8-4.6 hr/unit (5.0 hr/unit)	35-55 u/ha (61.6 u/ha) (41.49 u/ha)	35-65 u/ha	45-90 u/ha
3.1-3.7 hr/unit	40-65 u/ha	40-80 u/ha	55-115 u/ha (82.99 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	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	50-95 u/ha	70-170 u/ha	70-260 u/ha

The **London Plan Policy 3.4** (see TfL WebCAT Access Requirements above), shows the actual applicable **Densities** referenced. **The text in Blue** identifies the approximate **appropriate densities for a suburban setting at PTAL 1b**. **The Green are the existing Densities** and **The Red text are the applicant's proposed densities**.

The actual required **PTAL** for the proposed development is in the range **4 to 6**. To allow a range from the **lowest Accessibility of 0 to 1** to the **highest accessibility is totally unacceptable and completely ignores the objectives of London Plan Policy 3.4 – Optimising Housing Potential**.

Using the **TfL WebCAT** and the methodology of **Assessing Transport Connectivity** in London and Assuming the incremental ranges are **approximately linear** then they would follow the linear equation: **$y = mx + c$** ; Where **y = Density**; **m = Rate of change $\Delta y/\Delta x$ (or slope)**; **x = PTAL** and **c = intersect when y = 0**.

Then the required **PTAL** for the proposed **Densities** can be calculated as follows:

For **Residential Density** of **414.94 hr/ha**, the required **PTAL** is:

$$\text{Residential Density} = 414.94 = \left(\frac{350-200}{6-4}\right)x - 100 = 75x - 100 \quad \text{then } x = \text{PTAL} = 6.866$$

For **Housing Density** of **82.99 u/ha**, the required **PTAL** is:

$$\text{Housing Density} = 82.99 = \left(\frac{115-55}{6-4}\right)x - 65 = 30x - 65 \quad \text{then } x = \text{PTAL} = 4.933$$

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 **Residential Density** exceeds the maximum range **200 to 350 hr/ha** which would be required in excess of a **PTAL 6a** i.e. in excess of the **highest PTAL range** and requiring in excess of a TfL Access Index of **40+**

The appropriate **Residential Density** and **Housing Density** at locality of **PTAL 1b** (numerically 1.33) for a suburban setting, can be found by the same formula: $y = mx + c$,

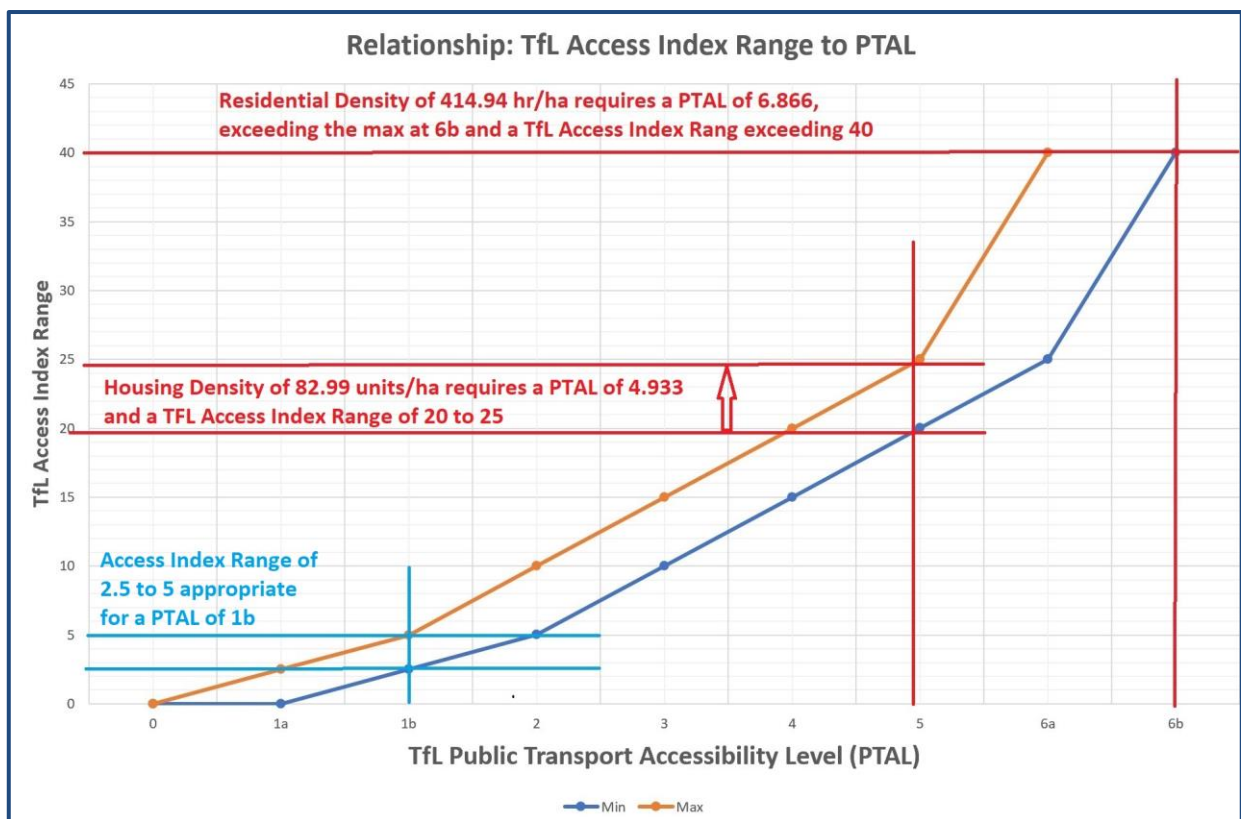
Where:

y = Density; m = Rate of change $\Delta y/\Delta x$ (or slope); x = PTAL= 1.33 and c = intersect when y = 0

$$\text{Residential Density} = \left(\frac{200-150}{1-0}\right) 1.33 + 150 = 50 * 1.33 + 150 = 216.5 \text{ hr/ha}$$

and

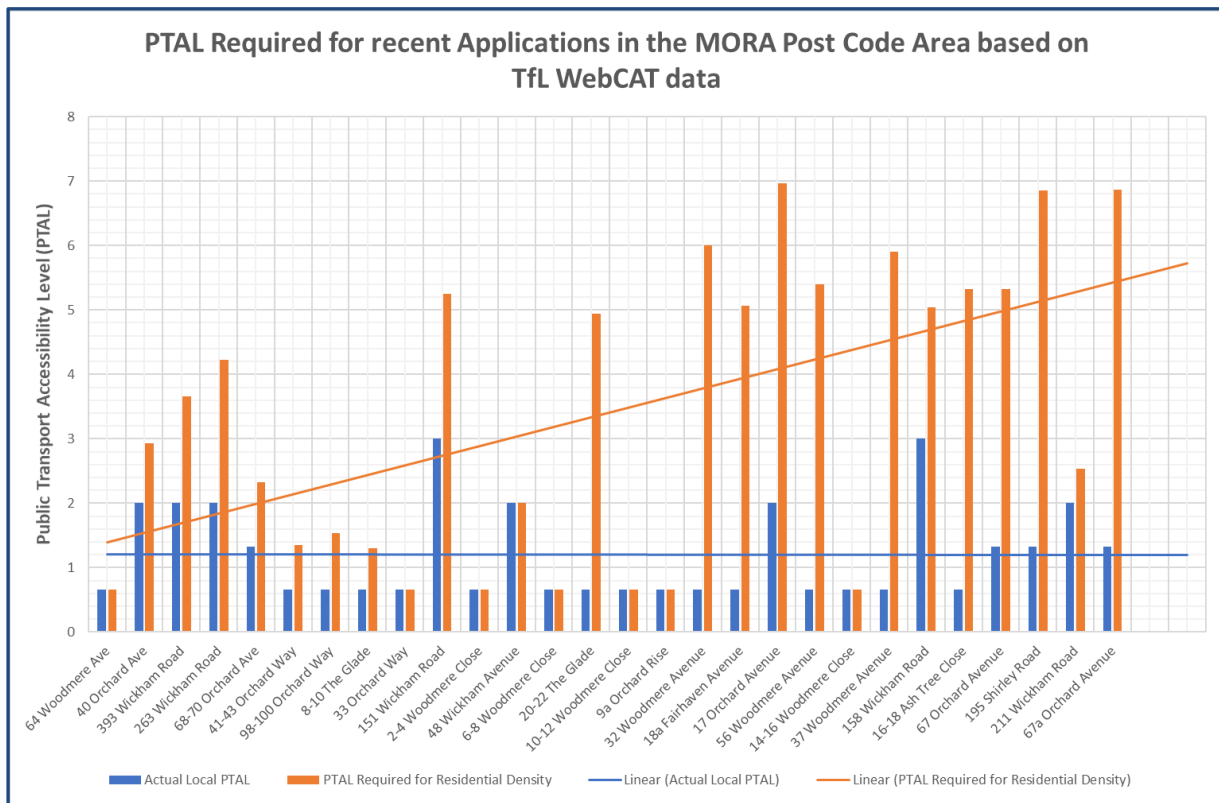
$$\text{Housing Density} = \left(\frac{55-35}{1-0}\right) 1.33 + 35 = 20 * 1.33 + 35 = 61.6 \text{ units/ha}$$



This graph illustrates the over-development relating to TfL Public Transport Access Index rating for this application at a site of PTAL 1b in a suburban setting

The foregoing analysis clearly shows that this proposed development will exceed the Access Index 'appropriate' for a Suburban setting and PTAL 1b which should require a TfL Access Index ^[1] of between ≈ 2.5 to ≈ 5 . Whereas this proposal has Housing Density of 82.99units/ha at a suburban setting which requires a PTAL of 4.933 and a TfL Access Index of between ≈ 20 to ≈ 25 . The Residential Density required at PTAL 6.866 in a suburban setting is greater than PTAL 6b and OFF the scale of the TfL Access Index ^[1].

[1] <http://content.tfl.gov.uk/connectivity-assessment-guide.pdf>



Cumulative PTAL requirements based upon Residential Density of recent application in the MORA POST CODE Area showing ongoing linear trend.

The histogram above illustrates how the cumulative effect of recent in-fill or redevelopments are increasing the local population without any supporting increase in infrastructure facilities including Public Transport Accessibility, GP Surgeries, school places or other facilities, which in turn result in unsustainable developments. We have not seen any benefit from Community Infrastructure Levy (CIL) from ANY of these recent developments.

Considering the New Draft London Plan

Policy [2] 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 [23A]).

[2] https://www.london.gov.uk/sites/default/files/draft_london_plan_-_consolidated_changes_version_-_clean_july_2019.pdf

[23A] PTAL and Time Mapping (TIM) catchment analysis is available on TfL’s WebCAT webpage. TIM provides data showing access to employment, town centres, health services, and educational establishments as well as

- 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.
- 3.1A.1** Infrastructure provision should be **proportionate to the scale of development**. The locations and scale of growth will be identified through boroughs' Development Plans, particularly through site allocations. **Infrastructure capacity, having regard to the growth identified in the Development Plan**, should be identified in **boroughs' infrastructure delivery plans** or programmes. Boroughs and infrastructure providers should also consider the cumulative impact of multiple development proposals in an area.
- 3.1A.2** If development comes forward with a **capacity in excess of that which could be supported by current or future planned infrastructure**, a **site-specific infrastructure assessment will be required**. This assessment should establish what additional impact the proposed development will have on current and planned infrastructure, and how this can be appropriately mitigated either on the site, or through an off-site mechanism, having regard to the amount of CIL generated.
- 3.1A.4** **Minor developments** will typically have **incremental impacts on local infrastructure capacity**. The cumulative demands on infrastructure of minor development should be addressed in boroughs infrastructure delivery plans or programme. Therefore, it will not normally be necessary for minor developments to undertake infrastructure assessments or for boroughs to refuse permission to these schemes on the grounds of infrastructure capacity.

Policy D1B Optimising site capacity through the design-led approach

The design-led approach

- A** All development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. The design-led approach requires

displaying the population catchment for a given point in London (see PTAL in glossary for more information on WebCAT and Time Mapping).

consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth, and existing and **planned supporting infrastructure capacity** (as set out in **Policy D1A**), and that best delivers the requirements set out in Part B.

B Development proposals should:

Form and layout

- 1) enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions
- 2) encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings, that are aligned with peoples' movement patterns and desire lines in the area
- 3) be street-based with clearly defined public and private environment
- 4) facilitate efficient servicing and maintenance of buildings and the public realm, as well as deliveries, that minimise negative impacts on the environment, public realm and vulnerable road users.

3.1B.23 To help assess, monitor and compare development proposals several measures of density are required to be provided by the applicant. Density measures related to the residential population will be relevant for infrastructure provision, while measures of density related to the built form and massing will inform its integration with the surrounding context.

The following measurements of density should be provided for all planning applications that include new residential units:

- 1) number of units per hectare
- 2) number of habitable rooms per hectare
- 3) number of bedrooms per hectare
- 4) number of bedspaces per hectare.

3.1B.24 Measures relating to height and scale should be the maximum height of each building or major component in the development. Boroughs should report each of the required density measures provided by the applicant when they submit details of the development to the London Development Database. The following additional measurements should be provided for all major planning applications:

- 1) the Floor Area Ratio (total Gross External Area of all floors / site area)
- 2) the Site Coverage Ratio (Gross External Area of ground floors /site area)
- 3) the maximum height in metres above ground level of each building and at Above Ordinance Datum (above sea level).

D1A – Infrastructure requirements for sustainable densities:

Policy A The TfL forecast for PTAL at this location is PTAL 1b until 2031 so there is NO provision of future planned levels of infrastructure at this Location;

Policy B There is insufficient capacity of existing infrastructure to support the proposed densities, and the LPA have not planned for sufficient capacity to be provided to exist at the appropriate time of this application;

Policy C As the proposal requires additional sufficient capacity to exist at the appropriate time for the sustainability of the proposal and the planned infrastructure capacity

will be exceeded, the additional infrastructure proportionate to the development should be delivered through the application of the development by at least the appropriate CIL. The LPA have not assessed or provided an infrastructure assessment during the planning application process, which will have regard to the local infrastructure delivery plan or programme.

Policy 3.1A.1 The Croydon LPA has not provided an **“infrastructure delivery plan”** or **“programmes”** to assess the requirement of infrastructure needs of the locality. Equally the LPA and/or infrastructure providers have NOT considered the **“cumulative impact of multiple development proposals in the area”** for which there is absolutely NO evidence that any cumulative assessment has been considered.

Policy 3.1A.2 As the proposed development site capacity is in excess of that which could be supported by current or future planned infrastructure, the LPA should undertake a site-specific infrastructure assessment as required by the policy.

Policy 3.1A.4 The cumulative demands on infrastructure of minor development should be addressed in the boroughs infrastructure delivery plans or programmes.

Policy D1B Optimising site capacity through the design-led approach

The design-led approach requires the following parameters to be provided by the Applicant:

Para 3.1B.23

- 1) number of units per hectare
- 2) number of habitable rooms per hectare
- 3) number of bedrooms per hectare
- 4) number of bedspaces per hectare.

Para 3.1B.24

- 1) the Floor Area Ratio (total Gross External Area of all floors / site area)
- 2) the Site Coverage Ratio (Gross External Area of ground floors /site area)
- 3) the maximum height in metres above ground level of each building and at Above Ordinance Datum (above sea level).

Policy D1B requires these parameters for **each application** but does **NOT** provide any guidance on methodology of analysis to indicate acceptance or otherwise – so although required the Policy, as Policy. is pretty useless in defining acceptable Densities!

London Plan Policy D1B			
para 3.1B.23			
1	Units/hectare	82.99	u/ha
2	Habitable Rooms per hectare	414.94	hr/ha
3	Bedrooms per hectare	207.47	br/ha
4	Bedspaces per hectare	373.44	bs/ha
para 3.1B.24			
1	Floor Area Ratio per Site Area	6846.47	GIA/ha
2	Site coverage Ratio per site area	4149.38	GIA/ha
3a	Height above ground level	Not Stated	Not Known
3b	Height above sea Level	Not Stated	Not Known

Given that Croydon LPA have taken the view that the current 'London Plan Policy 3.4 – Optimising Housing Potential' is to be disregarded and have not defined a methodology or an evaluation criteria for establishing the appropriate Densities as required by the New London Plan Policy D1A - Infrastructure Requirements for Sustainable Densities ^[4] and Policy D1B - Optimising Site Capacity Through the Design-Led Approach, we have used the established TfL WebCAT data as the only available method of analysis of Residential & Housing Density appropriate for a Suburban Setting at PTAL 1b.

Summary

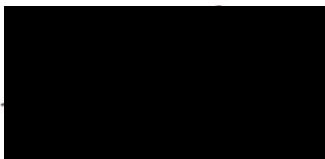
This proposal considerably exceeds the Residential Density and Housing Density for this location at a suburban Setting and PTAL 1b and should therefore be refused.

The existing and future planned Infrastructure has **NOT** been evaluated in accordance with the London Plan Policy 3.4 – Optimising Housing Potential or the emerging London Plan Policy D1A – Infrastructure requirements for sustainable densities or D1B – Optimising site capacity through the design-led approach. 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 decision in due course.

Yours sincerely



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

On behalf of the Executive Committee, MORA members and local residents.

Cc:

Cllr. Gareth Streeter

Cllr. Richard Chatterjee

Cllr. Sue Bennett

Shirley North Ward Councillor

Shirley North Ward Councillor

Shirley North Ward Councillor

Bcc:

MORA Executive Committee

Local effected Residents

[4] It is understood from Questions to the Mayor that a Supplementary Planning Guidance is to produced and issued during early 2020 which details the approach and methodology for evaluating Policy D1A and D1B.