

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

**Monks Orchard Residents' Association  
Planning**

3<sup>rd</sup> April 2020

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<b>Reference</b>	<b>20/01256/FUL</b>
<b>Application Received</b>	<b>Mon 16 Mar 2020</b>
<b>Application Validated</b>	<b>Mon 16 Mar 2020</b>
<b>Address</b>	<b>Land R/O 211 Wickham Road Croydon CR0 8TG</b>
<b>Proposal</b>	<b>Demolition of existing structures to the rear of 211 Wickham Road and erection of a two storey building containing four dwellings with associated alterations</b>
<b>Case Officer</b>	<b>George Clarke</b>
<b>Consultation Expiry Date</b>	<b>Wed 15 Apr 2020</b>

Dear Mr Clarke

We do not fundamentally object to this proposed development at this location as it blends well with the surrounding existing properties. However, there are areas of concern that we highlight which we believe require consideration prior to a decision which could be the subject of modification for acceptability.

**Parameters Relevant to the proposal:**

211 Wickham Road		Ref: 20/01256/FUL													
Site Area		0.03 ha													
	Floor	Bedrooms	Bed Spaces	Habitable Rooms	GIA Provided	GIA Required (Table 3.1)	Built-In Storage Provided	Built-In Storage Required (Table 3.1)	Communal Amenity Space Provided	Private Amenity Space Provided	Private Amenity Space Required	Private Amenity + GIA (DM10 Para 6.76)	Car Parking Provision	Play Space for Children	
Flat 1	Ground	3	4	4	74.3	50	3.4	2.5	nil	34.3	7.0	57.0	1	34.3	
Flat 2	First	1	1	3	44.2	39	1.4	1.0	nil	None	5.0	44.0	1	N/A	
Flat 3	Ground	1	1	2	37.0	39	1.6 + ?	2.5	nil	17.0	5.0	44.0	1	N/A	
Flat 4	First	1	1	3	44.2	39	1.4	1.0	nil	None	5.0	44.0	1	N/A	
<b>Total</b>		<b>6</b>	<b>7</b>	<b>12</b>			<b>6.2</b>					<b>189.0</b>	<b>4</b>		
<b>Average hr/unit</b>		<b>3 hr/unit</b>													
<b>Residential Density</b>		<b>233.33 Bed-spaces/ha</b>													
<b>Residential Density</b>		<b>400.00 hr/ha</b>													
<b>Housing Density</b>		<b>133.33 units/ha</b>													
PTAL	2011	<b>2</b>													
PTAL	2031	<b>2</b>													
<b>Car Parking Provision</b>		<b>4</b>													
<b>Car Parking per person</b>		<b>0.57 spaces/occupant</b>													

**Comment #1      Flats 2 & 4 have NO private open space as required by:**

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

- a. Is of high-quality design, and enhances and respects the local character;
- b. Provides functional space (the minimum width and depth of balconies should be 1.5m);
- c. Provides a minimum amount of private amenity space of 5m<sup>2</sup> per 1-2 person unit and an extra 1m<sup>2</sup> per extra occupant thereafter;**

The Policy States **“ALL PROPOSALS FOR NEW RESIDENTIAL DEVELOPMENTS”** shall have private amenity space as defined by the Policy DM10.4 c).

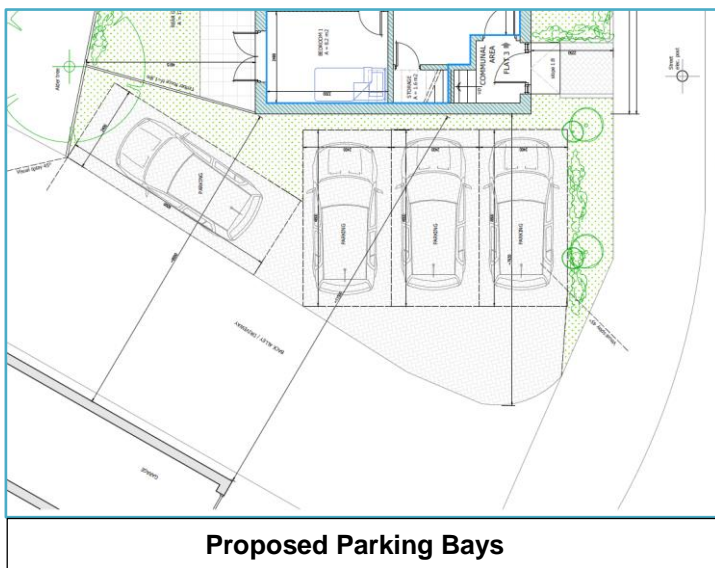
However, the Policy also states at paragraph 6.76:

**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.

The proposal would therefore be required to meet these **“exceptional circumstances”** defined in paragraph 6.76 in order to meet the policy and evaluation suggests this would meet the required modified GIA for Flats 2 & 4. Flat 2 & 4 have proposed GIA of 44.2m<sup>2</sup> and for 1b1p accommodation would require 5m<sup>2</sup> Private Amenity Space which when added to the Table 3.1 Requirement of 39m<sup>2</sup> equates to 44m<sup>2</sup> which is 0.2m<sup>2</sup> within the specified requirement.

However, does the Case Officer consider that this proposal has the appropriate **“Exceptional Circumstances”** of **“Site Constraints”** criterion which can allow and provide for para 6.76 to be considered necessary or could the **5m<sup>2</sup> Private Amenity Space** be provided by judicious rearrangement of the internal accommodation to allow provision of Private Outside Amenity balconies for Flats 2 and 4, either at front or rear elevations? **Please define the Exceptional Circumstances.**

**Comment #2** The Second very important consideration relates to Accessibility of Parking Bays numbers one to four.



Accepting that the vehicles are parked as shown on the plans provided, in a forward direction, and that the Access drive is ≈4.7m wide, it is unclear how each would park in a forward direction and then exit from the parking bay (if all other Bays were occupied) and exit the driveway across the footpath in a forward gear.

It is suggested that the Case Officer requests the Applicant to provide credible swept path illustrations of the ingress and egress of each vehicle if all other bays are occupied, to prove accessibility or otherwise for ingress and egress without fouling the boundary fencing of 2 Ridgemoor Avenue (not shown on the plans) or encroaching too near another parked vehicle.

**Comment #3 SPD2 Chapter 2 Suburban Residential Developments Section 2.29.4**

“Entrances should avoid tall wall or wooden fences either side of a new driveway that close off the development to the street.”

It is noted that the **1.8m Close Boarded fencing** on the side boundary of **2 Ridgemoor Avenue** precludes any visibility splay of the footpath to the north when exiting the new access driveway for the proposed car parking bays into **Ridgemoor Avenue**.

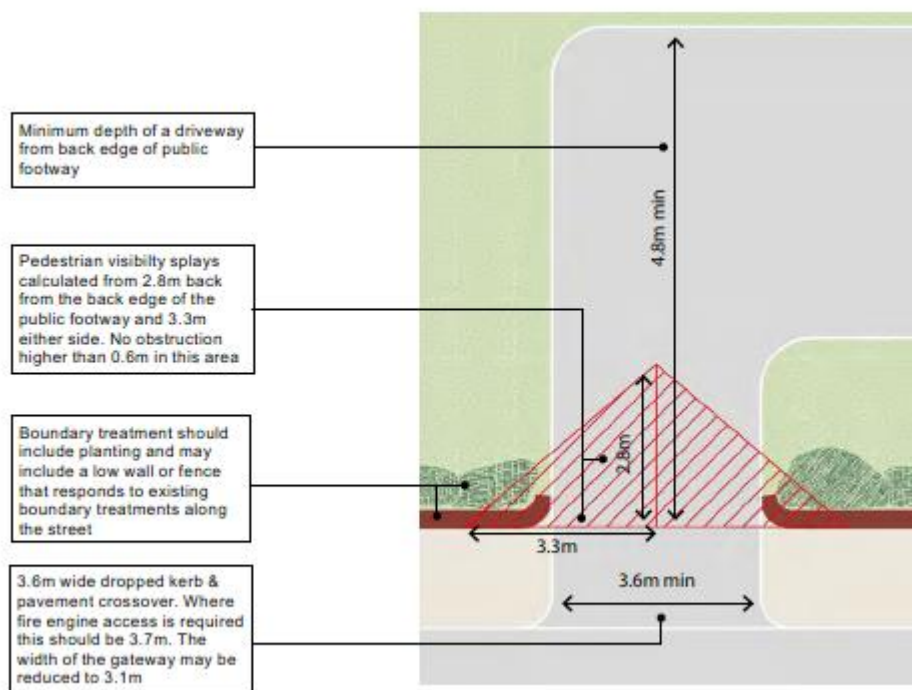
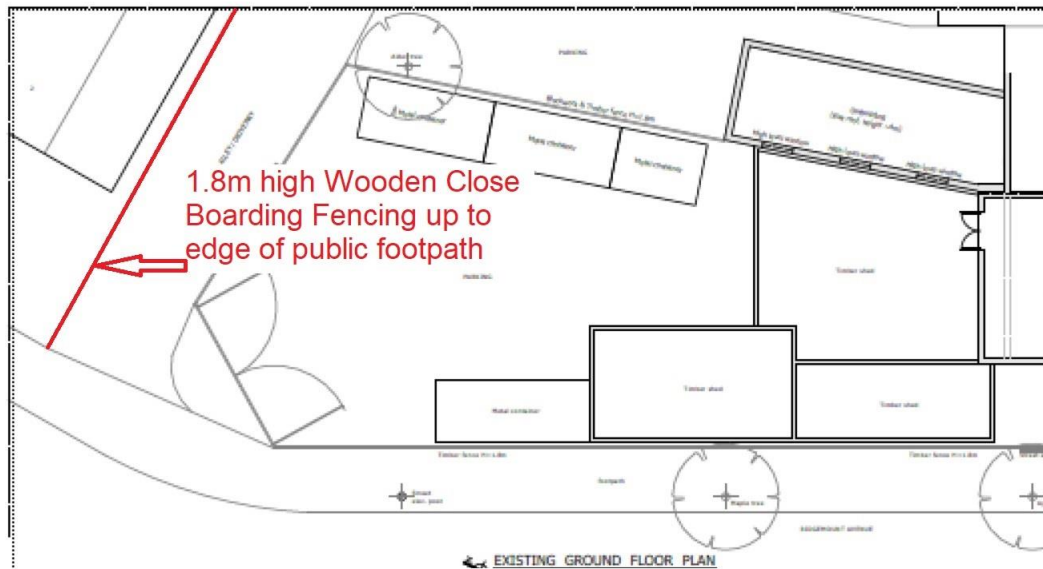


Figure 2.29e: Requirements for entrances and boundary treatments.

**SPD2 Policy 2.29 e) states: For “Pedestrian Visibility Splays from 2.8m back from the back edge of the public footway and 3.3m either side. There shall be no obstruction higher the 0.6m”.**





**Access Driveway at boundary of #2 Ridgemount Avenue Showing the 1.8m Tall Fencing up to the boundary of the Public footpath, precluding any visibility splays to the North as viewed from the Exit from the New Parking Bays into Ridgemount Avenue.**

**Comment #4** The Residential Density at 400hr/ha at PTAL 2 for an Urban Setting is within the range of 200 to 450 hr/ha and Housing Density of 133.33u/ha at PTAL 2 for an Urban Setting is within the range of 70 to 170 units/ha so acceptable Densities for the Setting (Shirley Urban Shopping Centre at area designated "Focussed Intensification" PTAL 2 (Proves it can be done if suitably planned!).

Please consider these comments as constructive observations which need to be considered prior to a determination.

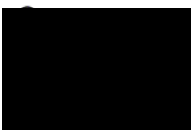
Please register our submission on the on-line comments for this application as **Monks Orchard Residents' Association (Neutral)**.

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)
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