

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**

2nd June 2020

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| | |
|------------------------------|--|
| Reference | 20/01578/FUL |
| Application Received | Mon 06 Apr 2020 |
| Application Validated | Wed 13 May 2020 |
| Address | 11 Orchard Avenue Croydon CR0 8UB |
| Proposal | Provision of an additional storey to convert the existing single-family house into two flats |
| Status | Awaiting decision |
| Case Officer | George Clarke |
| Consultation close | Sat 13 Jun 2020 |

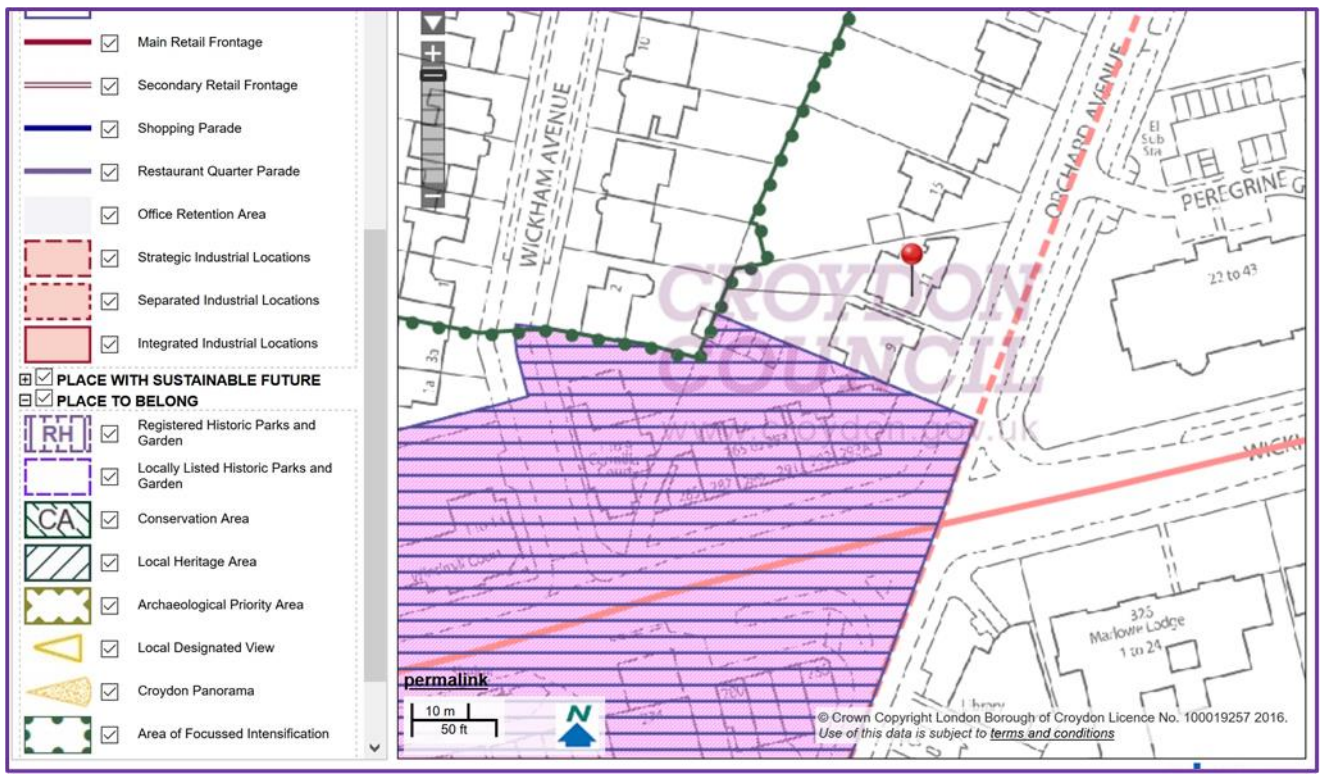
Dear Mr Clarke

Please accept this formal letter of objection to the proposal **Ref: 20/01578/FUL** for Provision of an additional storey to convert the existing single-family house into two flats at **11 Orchard Avenue**, CR0 8UB. We should 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,” especially as the cumulative yearly allocated Target of dwellings for the “Shirley Place” (yearly allocations) have already been met in just the MORA Post Code Area!**

Parameter of proposal:

| 11 Orchard Avenue | | | Ref: 20/01578/FUL | | Existing Dwellings | | | 1 | PTAL | 2011 | 2 |
|----------------------------|----------|--------------|--------------------------------|--------------------------------|--|---|--|--|---|--|--|
| SiteArea | 237 | sq.m. | 0.0237 | | Existing Bedrooms | | | 2 | PTAL | 2031 | 2 |
| Floor | Bedrooms | Bed-Spaces | Habitable Rooms ⁽³⁾ | 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 ⁽¹⁾ (m ²) | Private Amenity Space Required (m ²) | GIA + Private Amenity Space ⁽²⁾ (m ²) |
| Flat 1 | Ground | 2 | ? | 6 | ? | ? | ? | ? | ? | ? | ? |
| Flat 2 | First | 2 | ? | 4 | ? | ? | ? | ? | ? | ? | ? |
| Totals | | 4 | ? | 10 | ? | ? | ? | ? | ? | ? | ? |
| Residential Density | | ? | hr/ha | | Car Parking Spaces | | | ? | | | |
| Housing Density | | 84.39 | u/ha | | Parking per occupant | | | ? | spaces/occupant | | |
| Average hr/unit | | 1.67 | hr/u | | Parking per Dwelling | | | ? | Per Dwelling | | |
| Residential Density | | ? | bed-spaces/ha | | | | | | | | |

⁽³⁾ Kitchen/Dining/Living Open Plan configuration - considered as two habitable Rooms (Kitchen a non-habitable room)



The Policies Map:

Shows that 11 Orchard Avenue is within a designated area of “**focussed Intensification**” but outside the **Shirley Primary Local Shopping area**,

Comment #1

The applicant’s proposals are deficient of the following:

- a) The Plans do NOT show relationship with adjacent Properties at Site or ground floor level;
- b) The Elevations do NOT show relationship with adjacent properties to ascertain any degradation of amenity or Daylight reductions as a result of the increased height of the existing property, including the rear elevation 45 Degree (vertical) Rule;
- c) Two rooms of the ground floor are not identified whether habitable or non-habitable;
- d) There are no Floor Area’s (GIA) measurements provided to establish whether the proposal meets the accommodation Minimum Space Standards;
- e) There are no designated built in storage areas identified to show compliance to the requirements of the London Plan Minimum Space Standards;
- f) There is no Kitchen designate in the Presumably Flat 1 ground floor Plan;

- g) It is not possible to calculate number of occupants from the information provided;
- h) It is not possible to calculate the number of bed-spaces from the information provided;
- i) There is no indication of Car Parking Spaces other than the garage for Flat 1;
- j) There is no separate open amenity space for Flat 2.
- k) There is no designated Private Open Space for Flat 2.

Comment #2

Inappropriate Design:

- l) The Access to Flat 2 from the street is via passageway alongside the garage to the rear and an entrance via the rear of the ground floor garage to a staircase at the rear of the garage of Flat 1 – this is a totally inappropriate entrance to the first floor flat and extremely confusing for deliveries and a postal address;
- m) The doors of Flat 2 open inward and allow exit onto the roof of what is probably a conservatory (but is not designated). Is this roof structurally sound for this access and should there be protection to retain persons from falling off?
- n) Although the proposal is to provide accommodation for a family member's independence it should still meet planning policies for future occupiers.

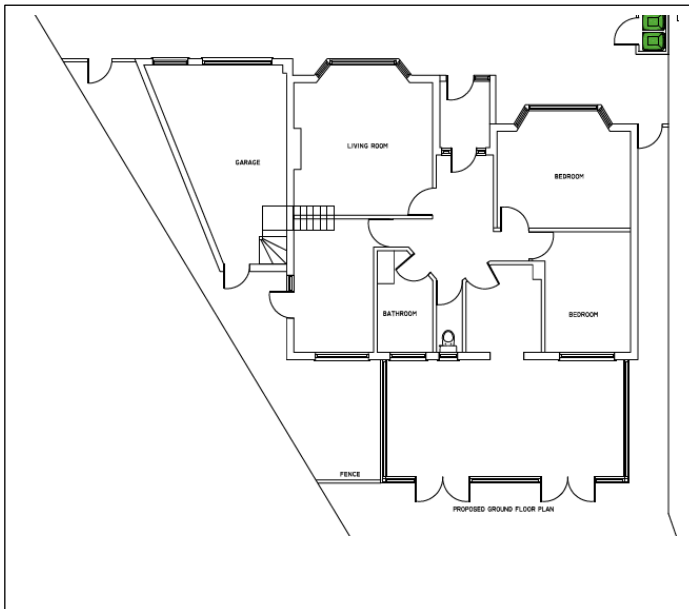
Accommodation Standards:

London Plan Policy 3.5 - Quality and design of housing developments states:

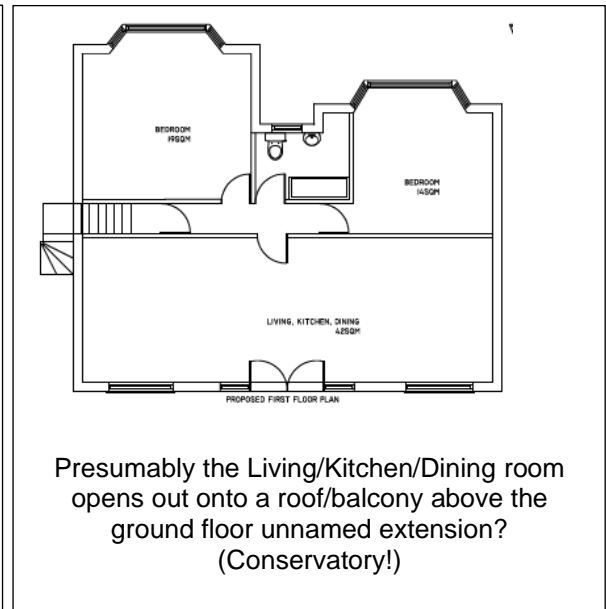
A Housing development should be of the highest quality internally, externally and in relation to their context and to the wider environment, taking account of strategic policies in this Plan to protect and enhance London's residential environment and attractiveness as a place to live. Boroughs may in their LDFs introduce a presumption against development on back gardens or other private residential gardens where this can be locally justified.

B The design of all new housing developments should **enhance** the quality of local places, taking into account physical context; local character; density; tenure and land use mix; and relationships with, and provision of, public, communal and open spaces, taking particular account of **the needs of children, disabled and older people**.

3.36 The Mayor regards **the relative size of all new homes** in London to be a key element of this strategic issue and therefore has adopted the **Nationally Described Space Standard** ^[6]. **Table 3.3** sets out **minimum space standards** for dwellings of different sizes. **This is based on the minimum gross internal floor area (GIA)** required for new homes relative to the **number of occupants** and taking into account commonly required furniture and the spaces needed for different activities and moving around. This means developers should state the number of **bedspaces/occupiers** a home is designed to accommodate rather than, say, simply the number of bedrooms. **These are minimum standards which developers are encouraged to exceed.**



Proposed Ground Floor



Proposed First Floor

Residential & Housing Densities:

The **Current Adopted London Plan Policy 3.4 – Optimising Housing Potential** is set out below:

Policy 3.4 Optimising housing potential:

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.**

3.30 Where transport assessments other than **PTALs** can reasonably demonstrate that a site has either good existing or **planned public transport connectivity and capacity**, and subject to the wider concerns of this policy, the **density of a scheme** may be at the **higher “end” of the appropriate density range. Where connectivity and capacity are limited, density should be at the lower “end” of the appropriate range.** The **Housing SPG provides further guidance** on implementation of this policy in different circumstances including mixed use development, taking into account plot ratio and vertical and horizontal mixes of use.

Croydon Plan Review Targets for Shirley.

| Ward | Target (2019 – 2039) 20 yrs. | Annual Average | 9.687% Reduction (2019 – 2039) | Annual Reduced Target |
|---------|------------------------------|----------------|--------------------------------|----------------------------------|
| Shirley | 360 - 450 | 18 – 22.5 | 342 - 406 | 16.25 – 20.32 Average = 18.29 |

New Dwellings in the MORA Post Code Area of Shirley North Ward - 2019:

| Reference | Status | Date Decided | Shirley Ward | House Number | location | dwellings lost | New Dwellings | Overall Change | Parking Spaces | PTAL | Comments |
|-------------------|---------|--------------|--------------|--------------|----------------|----------------|---------------|----------------|----------------|------|-------------------------|
| 18/05928/FUL | Granted | 01/02/19 | North | 20 - 22 | The Glade | 2 | 2 | 2 | 2 | 1a | rear garden development |
| 19/00051/FUL | Granted | 27/02/19 | North | 10 - 12 | Woodmere Close | 0 | 1 | 1 | 2 | 1a | |
| 18/06070/FUL | Granted | 21/03/19 | North | 9a | Orchard Rise | 1 | 9 | 8 | | 1a | |
| 19/00783/FUL | Granted | 26/09/19 | North | 32 | Woodmere Ave | 1 | 7 | 6 | | 1a | |
| 19/01761/FUL | Granted | 20/06/19 | North | 18a | Fairhaven Ave | 1 | 9 | 8 | | 1a | |
| 19/03064/FUL | Granted | 30/09/19 | North | 37 | Woodmere Ave | 1 | 8 | 7 | | 1a | |
| 19/02994/FUL | Refused | 23/03/20 | North | 49-51A | Shirley Rd | | | | | | |
| 19/02839/FUL | Refused | 11/10/19 | North | 36 | Lorne Gdns | | | | | | |
| 19/01352/FUL | Granted | 25/10/19 | North | 56 | Woodmere Ave | 1 | 9 | 8 | | 1a | |
| 19/00131/FUL | Granted | 07/11/19 | North | 17 | Orchard Ave | 1 | 8 | 7 | 4 | 2 | |
| 19/01484/FUL | Granted | 23/10/19 | North | 14 - 16 | Woodmere Close | 0 | 1 | 1 | 2 | 1a | |
| Total 2019 | | | | | | 8 | 54 | 48 | 10 | | |

Dwellings Approved in the **MORA (Post Code Area)** i.e. **NOT all Shirley North Ward** during 2019 = 48 which **significantly exceeds** the maximum yearly average target of 18.29 (i.e. an increase of 162.438% over the target) for the **whole of Shirley i.e. Shirley North Ward & Shirley South Ward.**

Percentage increase = (Increase - Original) × 100. = ((48 – 18.29)/18.29) × 100

Therefore, Percentage Increase ≈ 162.438%

Similarly, for 2020 so far:

| Reference | Status | Date | Shirley Ward | House Number | location | Dwellings lost | New Dwellings | Overall Change | PTAL | Car Parking |
|--------------------------|-----------|----------|--------------|--------------|----------------|----------------|---------------|----------------|------|-------------|
| 19/04699/FUL | Granted | 12/02/20 | North | 141b | Wickham Rd | 0 | 2 | 2 | 3 | 0 |
| 19/04136/OUT | Granted | 14/02/20 | North | 104 | Wickham Rd | 1 | 9 | 8 | 2 | 3 |
| 19/04705/FUL | Granted | 28/02/20 | North | 16-18 | Ash Tree Close | 2 | 8 | 6 | 1a | 8 |
| 20/00299/FUL | Withdrawn | 17/03/20 | North | 211 | Wickham Road | | | | | |
| 20/00092/FUL | Refused | 20/03/20 | North | 67 | Orchard Avenue | | | | | |
| 19/04149/FUL | Granted | 18/03/20 | North | 151 | Wickham Rd | 0 | 4 | 4 | 3 | 0 |
| 19/02994/FUL | Refused | 23/03/20 | North | 49-51A | Shirley Rd | | | | | |
| 20/00356/FUL | Granted | 03/04/20 | North | 67a | Orchard Avenue | 1 | 2 | 1 | 1b | 2 |
| 20/01256/FUL | Refused | 11/05/20 | North | 211 | Wickham Rd | | | | | |
| 20/01997/FUL | Pending | TBD | North | 67 | Orchard Avenue | 1 | 6 | 5 | 1b | 6 |
| 20/02022/FUL | Pending | TBD | North | 141b | Wickham Road | 0 | 4 | 4 | 3 | 0 |
| 19/05218/FUL | Granted | 06/03/20 | South | 6&8 | Sandpits Road | 2 | 2 | 0 | 1b | 0 |
| Total 2020 so far | | | | | | 7 | 37 | 30 | | 19 |

This gives an **indication for 2020 approx.** half year totals already exceed the yearly 2020 targets for the **“Shirley Place.”**

The increase in number of dwellings by possibly 30 when the full year target average for the **whole of Shirley North Ward and Shirley South Ward** is 18.29.

An increase percentage of $((30 - 18.29)/18.29) \times 100 = 64.02\%$ for just approaching half a year so far.

These do NOT include the “Brick by Brick” Developments in the Shirley Wards

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.**

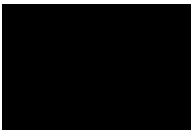
Please register our submission on the on-line comments for this application as **Monks Orchard Residents' Association (Objects).**

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:

| | |
|--------------------------|--------------------------------------|
| Ms Nicola Townsend | 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