

To: Mr James Udall - Case Officer  
Development Management  
Development and Environment  
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CR0 1EA

**Monks Orchard Residents' Association  
Planning**

11<sup>th</sup> June 2020

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<b>Reference</b>	20/02022/FUL
<b>Application Received</b>	Mon 11 May 2020
<b>Application Validated</b>	Wed 27 May 2020
<b>Address</b>	Old Lion Works 141B Wickham Road Croydon CR0 8TE
<b>Proposal</b>	Demolition of existing buildings and erection of part 1 storey, part 2 storey building containing 2 x 1 bedroom apartments & 2 x Studio apartments
<b>Status</b>	Awaiting decision
<b>Case Officer</b>	James Udall
<b>Consultation close</b>	Sat 27 Jun 2020

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Dear Mr Udall

Please accept this formal letter of objection to the proposal **Ref: 20/02022/FUL** for Demolition of existing buildings and erection of part 1 storey, part 2 storey building containing 2 x 1-bedroom apartments & 2 x Studio apartments at Old Lion Works 141B Wickham Road Croydon CR0 8TE. 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!**

### **Policy DM45: Shirley**

**DM45.1** Within Shirley Local Centre, to retain the unique qualities development should:

- Retain the continuity of ground floor active frontages and allow flexibility at first floor and above for mixed use;
- Reference, respect and enhance architectural features such as the consistent rhythm and articulation of fenestration and retain features such as the triangular bay windows;
- Complement the existing predominant building heights of 2 storeys up to a maximum of 4 storeys; and
- Incorporate or retain traditional shop front elements such as fascias, pilasters and stall risers.

**11.208** Shirley has **three urban** and one **suburban** shopping area characters along Wickham and Shirley Roads. The suburban feel of these shopping areas are strengthened by tree lined streets, green verges with

planting and small green spaces and parking accommodated in slip roads. These features play a vital role in creating Shirley's sense of place.



### The Policies Map:

The Policies Map shows that **141b Wickham Road** is within a designated **Local Primary Urban Shopping Centre** but **outside** the designated **Focussed Intensification Area**.

### Proposal Parameters:

141b Wickham Road			Ref: 20/02022/FUL		Policies Map		DM45.1					
SiteArea			0.02 ha		Urban Shopping Centre							
	Floor	Bedrooms	Bed-Spaces	Habitable Rooms <sup>(3)</sup>	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> ) <sup>(1)</sup>	Built-in Storage Required Table 3.1 New LP (m <sup>2</sup> )	Private Amenity Space Provided <sup>(1)</sup> (m <sup>2</sup> )	Private Amenity Space Required (m <sup>2</sup> )	GIA + Private Amenity Space <sup>(2)</sup> (m <sup>2</sup> )
App 1	Ground	1	2	2	53.0	50	?	5.625	1.5	60.8	5.0	55.0
App 2	Ground	1	2	2	52.0	50	?	7.84	1.5	37.0	5.0	55.0
Studio 1	First	1	2	2	39.0	50	?	3.8	2.0	38.3	5.0	55.0
Studio 2	First	1	2	2	39.0	50	?	3.8	1.5	39.9	5.0	55.0
<b>Totals</b>		<b>4</b>	<b>8</b>	<b>8</b>	<b>183</b>	<b>200</b>	<b>?</b>	<b>21.065</b>	<b>6.5</b>	<b>175.9</b>	<b>20.0</b>	<b>220.0</b>
<b>Residential Density</b>			<b>400.00</b> hr/ha	<b>PTAL Required at Residential Density of 400 hr/ha =</b>						<b>2.8</b> acceptable		
<b>Housing Density</b>			<b>200.00</b> u/ha	<b>PTAL Required at Housing Density of 200 u/hr =</b>						<b>5.7</b> unacceptable		
<b>Average hr/unit</b>			<b>2.00</b> hr/u	<sup>(1)</sup> As scaled off drawings @112% magnification								
<b>Residential Density</b>			<b>400.00</b> bed-spaces/ha	<b>Private Amenity Space <sup>(2)</sup></b>		<b>GIA + Private Amenity Space; Policy DM10 para 6.76</b>						
<sup>(3)</sup> Kitchen/Dining/Living/bed Open Plan configuration - considered as two habitable Rooms (Kitchen a non-habitable room)												
<b>Infrastructure:</b>				<b>Car Parking Spaces</b>				0				
PTAL	2011	3		Parking per occupant				0 spaces/occupant		0		
PTAL	2031	3		Parking per Dwelling				0 Per Dwelling		0		

Table 3.2 Sustainable residential quality (SRQ) Density Matrix (habitable rooms and dwellings per hectare)			
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
3.8-4.6 hr/unit	35-55 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
2.7-3.0 hr/unit	50-75 u/ha	50-95 u/ha	70-130 u/ha
<b>Urban</b>	150-250 hr/ha	<b>200-450 hr/ha (400.00 hr/ha)</b>	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	<b>55-225 u/ha (200 u/ha)</b>
<b>2.7-3.0 hr/unit (1.5hr/u)</b>	50-95 u/ha	70-170 u/ha	70-260 u/ha

### The location is an Urban Shopping Centre

The PTAL for Residential Density of 400.00hr/ha is found by:  
 $400 = 250x - 300$   
 where  $x = \text{PTAL} = 2.8$  acceptable in the range of 2 to 3.

The PTAL for Housing Density of 200u/ha nearest range is in the PTAL range of 4 to 6  
 $200 = 85x - 285$   
 Where  $x = \text{PTAL} = 5.7$   
 When actual PTAL available is 3  
 (See calculations below)

### Residential & Housing Density & PTAL Assessment:

The Site area is stated as 0.2ha giving a Residential Density of 6hr/ha equals  $6/0.02 = 300\text{hr/ha}$  and for Housing Density of 4 units/ha in the site area of 0.02ha equals  $4/0.02 = 200\text{u/ha}$

The Residential Density of 300 hr/ha in an Urban setting (assuming the incremental increase over the ranges of Table 3.2 are linear) are given by:

$y = mx + c$  where  $y = \text{Density}$ ;  $m = \text{Slope} = \Delta y/\Delta x$ ;  $x = \text{PTAL}$  and  $c = y$  when  $x = 0$

$$m = \Delta y/\Delta x = (450-200)/(3-2) = 250$$

we have two known points on the straight-line  $y = mx + c$  at:

$$\text{maximum } y = 450 = 250 \times 3 + c = 450 = 750 + c$$

$$\text{minimum } y = 200 = 250 \times 2 + c = 200 = 500 + c$$

therefore, adding the two equations becomes  $650 = 1250 + 2c$  &  $c = -600/2 = -300 = c$

thus:  $400 = 250 * x + (-300)$  &  $x = \text{PTAL} = 2.8$  (within the appropriate range for the locality @ PTAL 3)

A Residential Density of 400 hr/ha in an Urban Setting would require a local PTAL of 2.8.

### Similarly, for Housing Density of 200units/ha in an Urban Setting:

The nearest range of PTAL for Housing Density 200 units/ha is in the range 55 to 225 u/ha and is given by:  $y = mx + c$  where  $y = \text{Density}$ ;  $m = \text{Slope} = \Delta y/\Delta x$ ;  $x = \text{PTAL}$  and  $c = y$  when  $x = 0$

$$m = \Delta y/\Delta x = (225-55)/(6-4) = 85$$

again, we have two known points on the straight-line  $y = mx + c$  at:

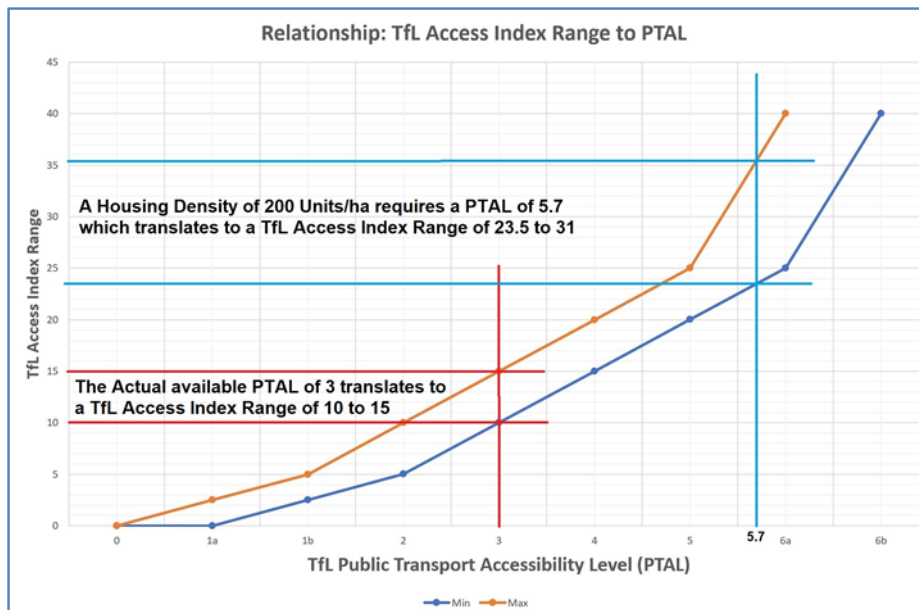
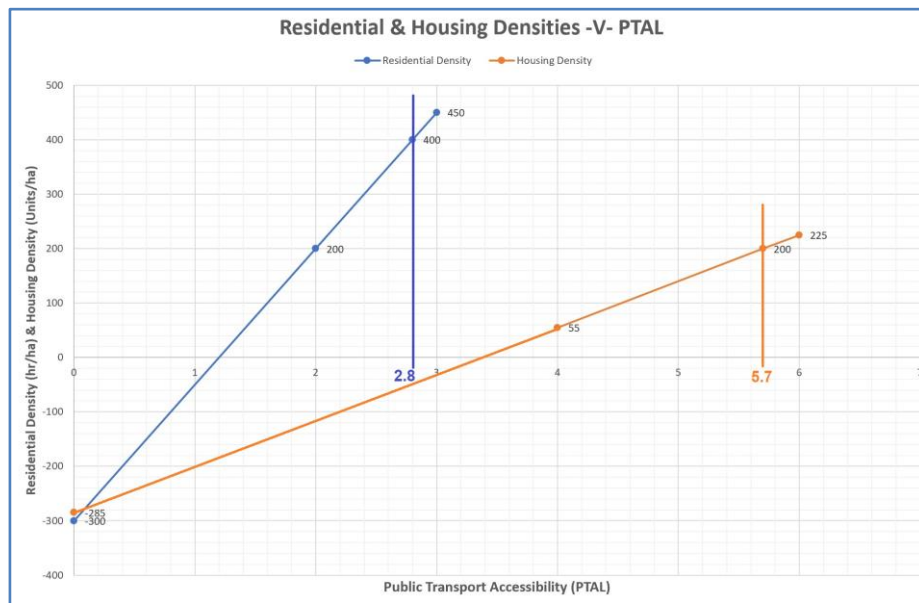
$$\text{maximum } y = 225 = 85 \times 6 + c \text{ becomes } 225 = 510 + c$$

$$\text{minimum } y = 55 = 85 \times 4 + c \text{ becomes } 55 = 340 + c$$

therefore, adding the two equations becomes  $280 = 850 + 2c$  &  $c = -570/2 = -285 = c$

thus  $y = 200 = 85 * x + (-285)$  &  $x = \text{PTAL} = 5.7$  (in the range 4 to 6 when the actual PTAL is 3)

Thus, a Housing Density of 200units/ha at this Urban Location would require a PTAL of 5.7 when the available PTAL is 3 and forecast to remain at 3 until 2031.



## **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.

#### **Comment #1**

The applicant has not provided any **justification** for exceeding the PTAL for a **Housing Density** at **200 units/ha** for an **urban** setting with available PTAL of 3 when the PTAL required for a **Housing Density** of **200 units/ha** required is **5.7**.

#### **Comment #2**

A Housing Density of **200 units/ha** in an **Urban** Setting requires a **PTAL of 5.7** which translates to a **TfL Access Index Range of 23.5 to 31** when the actual available **PTAL** of the locality is only **3** which requires a **TfL Access Index of 10 to 15** thus proving the proposed development has **inadequate access to sustainable Public Transport Infrastructure**.

**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;
- d. All flatted development and developments of 10 or more houses must provide a minimum of **10m<sup>2</sup> per child of new play space**, calculated using the Mayor of London’s population yield calculator and as a set out in Table 6.2 below. The calculation will be based on all the equivalent of all units being for affordable or social rent unless as signed Section 106 Agreement states otherwise, or an agreement in principle has been reached by the point of determination of any planning application on the amount of affordable housing to be provided. When calculating the amount of private and communal open space to be provided, footpaths, driveways, front gardens, vehicle circulation areas, car and cycle parking areas and refuse areas should be excluded; and
- e. In the case of development in the grounds of an existing building which is retained, a minimum length of 10m and no less than half or 200m<sup>2</sup> (whichever is the smaller) of the existing garden area is retained for the host property, after the subdivision of the garden

#### **Comment #3**

This development proposal is **within the grounds of an existing building which is retained** and therefore the retained existing garden for the host property, after subdivision should be **NO LESS than a minimum** of 10m (in length) or 200m<sup>2</sup> in area. This proposal **fails this Policy DM10.4 e)** as the retained garden is only **≈4.4m in length**.

**DM10.5** In addition to the provision of private amenity space, proposals for new flatted development and major housing schemes will also need to incorporate high quality **communal outdoor amenity space** that is designed to be flexible, multifunctional, accessible and inclusive.

#### **Comment #4**

The proposal provides **NO communal outdoor amenity space** as required by Policy DM10.5

#### **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**.

#### **Comment #5**

The Refuse & Recycling Bins are NOT enclosed and are not an integral element of the overall design and therefore NOT compliant to Policy DM13.1

The Refuse & recycling storage bins are NOT within the building envelope or in covered facilities located behind the Building Line and thus Non-Compliant to Policy DM13.1 a).

The Refuse & Recycling are NOT conveniently located for operatives and their vehicles, being approximately 50m from the nearest road Vehicle point in Verdayne Avenue.

#### **Comment #6**

The Access to the Studio apartments is via an external staircase which traverses above the Apartments 1 & 2 which is somewhat uncommon and possibly subject to transmitted noise and disturbance for future occupiers below of Apartments 1 & 2.

#### **Comment #7**

The Access to the first-floor accommodation traverses the roof of the ground floor accommodation. This is considered a potential danger to occupants of the first floor in the event of fire in the ground floor apartments which would trap the first-floor Studio occupants with no alternative means of escape.

#### **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.**

### 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
18/05928/FUL	Granted	01/02/19	North	20 - 22	The Glade	2	2	2	2	1a
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
<b>Total 2019</b>						<b>8</b>	<b>54</b>	<b>48</b>	<b>10</b>	

### Comment #8

**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
<b>Total 2020 so far</b>						<b>7</b>	<b>37</b>	<b>30</b>		<b>19</b>

### **Comment #9**

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  $((18.29 - 30)/18.29) \times 100 = \mathbf{64.02\%}$  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.**

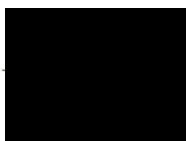
Please register our submission on the on-line comments for this application as **Monks Orchard Residents’ Association (Objects).**

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