

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**

12th June 2020

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Reference	20/02258/FUL
Application Received	Thu 28 May 2020
Application Validated	Thu 28 May 2020
Address	116 Orchard Way Croydon CR0 7NN
Proposal	Retention of the Public House on the ground floor and creation of an additional storey with rear extensions and associated alterations to provide 4 flats on the upper floors.
Status	Awaiting decision
Case Officer	George Clarke
Consultation close	Sun 05 Jul 2020

Dear Mr Clarke

Please accept this formal letter of objection to the proposal **Ref: 20/02258/FUL** for Retention of the Public House on the ground floor and creation of an additional storey with rear extensions and associated alterations to provide 4 flats on the upper floors.

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 fascia's, 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.

Proposal Parameters:

116 Orchard Way		Ref: 20/02258/FUL		Existing Dwellings		0							
SiteArea	285 sq.m.	0.0285 ha		Existing Bedrooms		0							
	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) ⁽⁴⁾	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	First	3	4	4	80.41	74	29.0	?	2.5	5.0	7.0	82.4	
Flat 2	First	1	2	2	50.24	50	26.0	?	1.5	5.0	5.0	50.2	
Flat 3	Second	2	3	3	66.07	61	26.0	?	2	5.0	6.0	67.1	
Flat 4	Second	3	4	4	74.70	74	27.0	?	2.5	5.0	7.0	76.7	
Totals		9	13	13	271.42	259	108.0	?	8.5	20.0	25.0	276.4	
Residential Density		456.14 hr/ha		PTAL Required at Residential Density of 456.14 hr/ha =						7.42			
Housing Density		140.35 u/ha		PTAL Required at Housing Density of 140.35 u/hr =						6.33			
Average hr/unit		3.25 hr/u		⁽⁴⁾ No indication of Built-In Storage Dimensions on plans									
Residential Density		456.14 bed-spaces/ha		Private Amenity Space ⁽²⁾		GIA + Private Amenity Space; Policy DM10 para 6.76							
⁽³⁾ Kitchen/Dining/Living Open Plan configuration - considered as one habitable Room (Kitchen a non-habitable room)													
Infrastructure:				Car Parking Spaces		1 Retained							
PTAL	2011	1a			Parking per occupant		0.08 spaces/occupant						
PTAL	2031	1a			Parking per Dwelling		0.25 Per Dwelling						

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 (456.14hr/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 (3.5 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 (140.35u/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 location is a Suburban Shopping Parade

The PTAL for Residential Density of 456.14hr/ha is outside the nearest range of 200 -350 found by:
 $456.14 = 75x - 100$
 where $x = \text{PTAL} = \mathbf{7.42}$
when the actual PTAL for this locality is 1a

The PTAL for Housing Density of 140.35u/ha nearest is in the PTAL range of **4 to 6**
 $140.35 = 30x - 50$
 Where $x = \text{PTAL} = \mathbf{6.33}$
when the actual PTAL for this locality is 1a
(See calculations below)

Residential & Housing Density & PTAL Assessment:

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.

Residential & Housing Density Assessment:

The Site area is stated as **0.0285ha** giving a **Residential Density** of **13hr/ha** equals $13/0.0285 =$ **456.14hr/ha** and for **Housing Density** of **4 units/ha** in site area of **0.0285ha** equals $4/0.0285 =$ **140.35u/ha**

The **Residential Density of 456.14hr/ha** in a suburban setting (assuming the incremental increase over the ranges of Table 3.2 are **linear**) are given by:

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

$$m = \Delta y/\Delta x = (350-200)/(6-4) = 75 = m$$

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

$$\text{maximum } y = 350 = 75 * 6 + c = 350 = 450 + c$$

$$\text{minimum } y = 200 = 75 * 4 + c = 200 = 300 + c$$

therefore, adding the two equations becomes $550 = 750 + 2c$ & $c = -200/2 = -100 = c$

thus: Residential Density $y = 456.14 = 75 * x + (-100)$ & $x = \text{PTAL} = 7.42$ (when the site is PTAL 1a)

A Residential Density of **456.14hr/ha** in a Suburban Setting would require a local **PTAL of 7.42**

Similarly, for Housing Density of **140.35units/ha** in a suburban Setting:

The nearest range of PTAL for Housing Density **140.35 units/ha** is in the range **70 to 130 u/ha** and is given by: $y = mx + c$ where $y =$ Density; $m =$ Slope $= \Delta y/\Delta x$; $x =$ PTAL and $c = y$ when $x = 0$

$$m = \Delta y/\Delta x = (130 - 70)/(6-4) = 30 = m$$

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

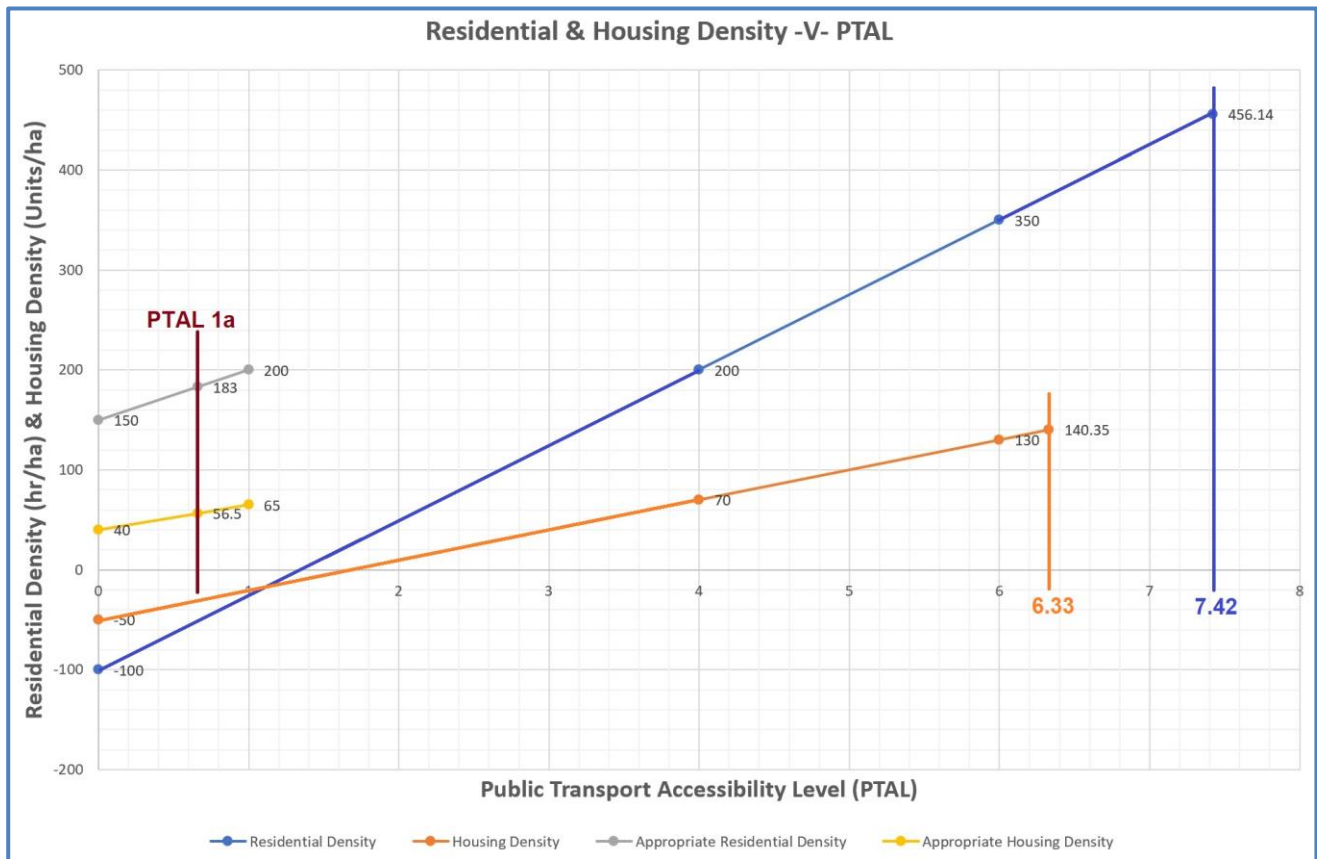
$$\text{maximum } y = 130 = 30 * 6 + c \text{ becomes } 130 = 180 + c$$

$$\text{minimum } y = 70 = 30 * 4 + c \text{ becomes } 70 = 120 + c$$

therefore, adding the two equations becomes $200 = 300 + 2c$ & $c = -100/2 = -50 = c$

thus: Housing Density $y = 140.35 = 30 * x + (-50)$ & $x = \text{PTAL} = 6.33$ (when the site is PTAL 1a)

A Housing Density of **140.35u/ha** in a Suburban Setting would require a local **PTAL of 6.33**



Comment #1

The applicant has not provided any **justification** for exceeding the Densities appropriate for the locality which has **PTAL of 1a**.

The proposal has a **Residential Density** in a **suburban** setting of **456.14hr/ha** which would require a **PTAL of 7.42** and a **Housing Density** of **140.35units/ha** in a **Suburban** setting which would require a **PTAL of 6.33**, when the available PTAL is 1a. (as shown on the above graph)

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

- Is of high-quality design, and enhances and respects the local character;
- Provides functional space (**the minimum width and depth of balconies should be 1.5m**);
- Provides a minimum amount of private amenity space of **5m² per 1-2-person** unit and an extra **1m² per extra occupant** thereafter;
- All flatted development and developments of 10 or more houses must provide a minimum of **10m² 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

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.**

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.**

Comment #2

There is no indication on the supplied plans of the dimension of **In-Built Storage space** and therefore it is not clear whether the proposal meets the requirement of the minimum space standards defined in the London Plan Table 3.1

Amenity Space Standards

	GIA Offered	Private Amenity Offered	Amenity Space Required	Offered GIA + Offered Amenity	Offered + Required	Deficient in Amenity Space
Flat 1	80.41	5.0	7.0	85.41	87.41	2.00
Flat 2	50.24	5.0	5.0	55.24	55.24	0.00
Flat 3	66.07	5.0	6.0	71.07	72.07	1.00
Flat 4	74.70	5.0	7.0	79.70	81.70	2.00

Flats 1, 3 & 4 are deficient in amenity space even when compensated by greater provision of GIA.

The Applicant's Design & Access Statement at para 5.39 states:

5.39 The proposed flats would all be provided with 5sq.m balconies. It is noted that the 2 bedroom and the 3-bedroom units would face a marginal shortfall in amenity space in relation to London Plan standards. However, all the units are of generous internal GIA standards and would be provided with a good quality of internal habitable space. In addition, there is available Public Amenity Space nearby within easy walking distance at Glade Wo4 od 0.52km from site and Parkfields). 0.79 km from site.

Comment #3

The proposed development has all balconies of 5m². However, to meet the Croydon Plan Policy at paragraph 6.76 additional internal floor space can be added to the minimum GIA requirement to compensate, but this is **NOT** sufficient for Flats 1, 3 & 4 as shown by the Table above. Therefore, the proposal does **NOT meet the Policy DM10.4 c)** as amended by para 6.76.

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

6.77 The provision of private and communal amenity space per unit, including child play space of 10m² per child, based on the calculation of numbers of children yielded from the development as set out in the Table 6.2 may be pooled to create a communal amenity space for a flatted development that meets all the requirements of this policy.

Comment #5

There is no allocation of **Play Space for the children** of occupants of the proposed development as required of Policy DM10 although there are only likely to be 5 children (max) in occupation.

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 #6

There are no provisions for **Refuse & Recycling facilities** for the future occupants of the proposed development and no reference to such in the Design and Access Statement. Therefore, the proposal is **non-compliant** to **Policy DM 13 Refuse & Recycling.**

Car Parking

The Applicants Design & Access Statement at Section Para 5.47 Parking and Highway Safety.

5.49 The London Plan suggests that car parking standards for a residential development in this location should provide a maximum of 1.5 parking spaces for 3-bedroom units and less than 1 parking space for 1-2-bedroom units. Therefore, the proposed units would have a maximum standard of 3 - 4 parking spaces. The proposal would retain 1 off-street garage parking space accessed from the service road to the rear. This parking space can be utilised for the benefit of one of the three bed units.

Comment #7

There are insufficient car parking spaces allocated for this proposal and on-street parking in the locality is very limited due to access to the local shopping parade and the Pub clientele, there is very limited on-street car parking. There is no legislation to prevent car ownership and thus it is likely that future occupants of this proposed development will require parking provision which will exacerbate local parking stress.

Comment #8

The entrance to Flats 3 & 4 is via the shared area of the stairs and entrance for all flats in the adjacent block, not by the same private entrance with flats 1 and 2 which may result in confusion for delivery personnel.

Cumulative recent Developments for MORA Post Code Area PTAL requirements.

Local Plan Review (2019) Targets:

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

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		

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

Comment # 9

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

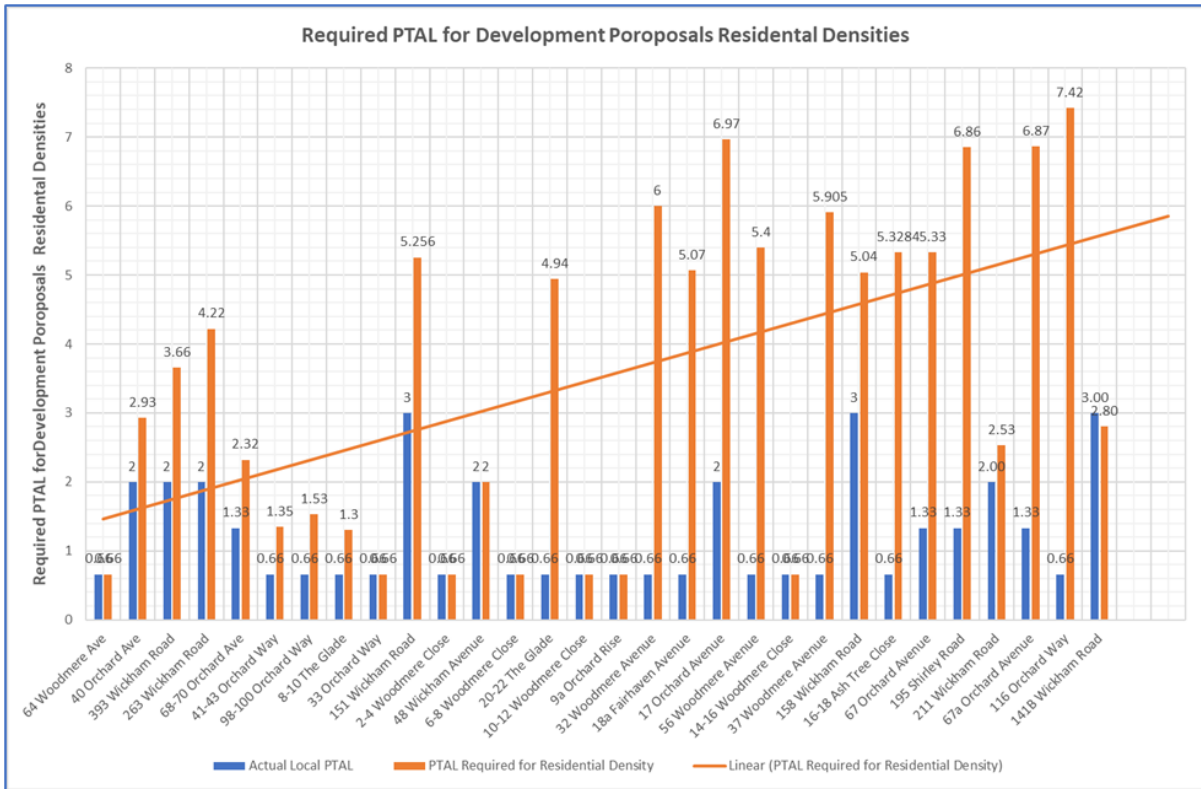
Comment #10

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) × 100 = **64.02%** for just approaching half a year so far.

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



Comment #11

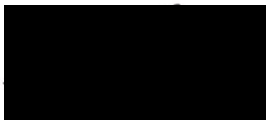
The cumulative increase in local population has not seen a complementary increase in any local service provision such as GP Practice support, local improved infrastructure and school places etc.

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.

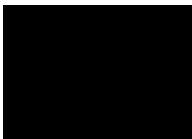
Please register our submission on the on-line comments for this application as **Monks Orchard Residents' Association (Objects)**.

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