

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

From:
**Monks Orchard Residents' Association
Planning**

Email:
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7th September 2020
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Reference:	20/03721/FUL
Application Received	Tue 18 Aug 2020
Application Validated	Tue 18 Aug 2020
Address	19 Orchard Avenue Croydon CR0 8UB
Proposal	Demolition of existing dwelling, erection of 9x flats, revised access, parking, landscaping and relocation of dropped kerb.
Status	Awaiting decision
Case Officer:	Christopher Grace
Consultation Expiry:	Thu 17 Sep 2020
Target Decision:	Tue 13 Oct 2020

Dear Mr Grace

We are a local Residents' Association, registered with the Croydon Local Planning Authority (LPA), representing approximately 3,800 households in the Shirley North Ward, in the London Borough of Croydon.

We object to this application on the following grounds:

We understand the need for additional housing but take the view that new housing developments **must** meet the current and emerging planning policies **to ensure future occupants have acceptable living standards and acceptable accessibility to present and proposed public Transport infrastructure**. We only object when proposals do not comply with current adopted or emerging planning policies which are designed to minimise overdevelopment and retain the local character within acceptable constraints. The type face with green background are **current adopted** Planning Policies.

Relevant Planning Policies

London Plan Adopted Policies:

Policy 3.4 Optimising Housing Potential

Policy 3.5 Quality and Design of Housing Developments

Policy 3.6 Play Spaces for Children

Policy 6.11 Smoothing traffic flow and tackling congestion

Policy 6.13 Parking

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Emerging Draft New London Plan Policies:

(The Draft New London Plan is currently undergoing Examination in Public (EiP).)

Chapter 2 Spatial Development Patterns

Chapter 3 Design

Policy D1A Infrastructure requirements for sustainable densities

Policy D1B Optimising site capacity through the design-led approach

Policy D2 Delivering good design

Policy D3 Inclusive design

Policy D4 Housing quality and standards

Policy D5 Accessible housing

Policy D10 Safety, security and resilience to emergency

Policy D11 Fire safety

Policy D13 Noise

Policy H1 Increasing housing supply

Policy H2 Small sites

Policy H2A Small housing developments

Policy H10 Loss of existing housing and estate redevelopment

Policy S1 Developing London's social infrastructure

Policy S4 Play and informal recreation

Policy G6 Biodiversity and access to nature

Chapter 9 Sustainable Infrastructure

Chapter 10 Transport

Policy T6.1 Residential parking

Croydon Local Plan adopted and emerging Planning Policies:

Policy DM10: Design and character

Policy DM13: Refuse and recycling

Policy DM29: Promoting sustainable travel and reducing congestion

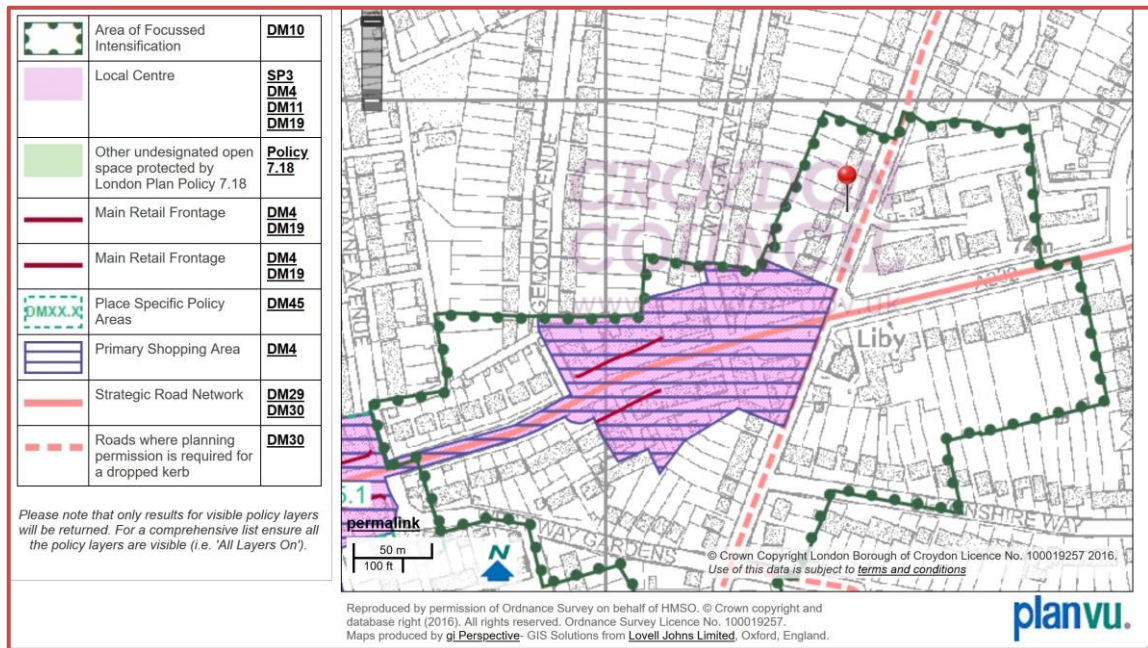
Policy DM30: Car and cycle parking in new development

Policy DM45: Shirley (Place Specific Policies).

Supplementary Planning Guidance SPD2 Suburban Residential Developments

The Croydon Local Plan shows the location of **19 Orchard Avenue** is within a designated area of "focussed intensification." The Policy allows further growth which can be accommodated through more efficient use of infrastructure. Due to the high availability of community and commercial services, intensification will be supported in and around District, Local and potential Neighbourhood Centres which have sufficient capacity for growth and applicable Policies are defined at **DM10.11**.

What "More Efficient use of infrastructure is required to meet the additional demands of this proposal and the cumulative requirements of developments in this area, recognising the following statement from our MP Sarah Jones?



Current Policies Map for 19 Orchard Avenue

However, in correspondence from Sarah Jones MP it was indicated that:

"I am writing to let you know some news about planning developments in Shirley. As you may be aware, parts of Shirley along the Wickham Road were designated a 'Focussed Intensification area' which meant that more intensive developments could be allowed along our high street.

*Many people in Shirley were concerned that we do not have the infrastructure to withstand intensive development and there was a risk that the character of the area might be affected. I am writing to let you know that the Council has listened to those concerns and concluded that **Shirley will no longer be categorised as a 'focused intensification area'.** Their planning update states:*

*'It looks increasingly unlikely that significant improvements to the public transport capacity in the Shirley area will be delivered over the period covered by the local plan and hence the area only has capacity for **limited future growth.**'*

*I think this is a sensible outcome. We desperately need more homes in Croydon and homelessness is very high, but clearly developments must have **infrastructure to support them and be sustainable.** ..."*

We therefore assume that the Policies Map above will need to be changed accordingly and the Local Plan updated to reflect this change in policy. **To continue to allow proposals of "Focussed Intensification" when it has been agreed that the Supporting Infrastructure is clearly unlikely to be delivered and additional approvals could result in further "Unsustainable Developments" in Shirley if allowed. Therefore this application should be refused.**

We “MORA” have been arguing this reasoning when formulating our objections ever since the Local Plan was drafted prior to its 2018 adoption but it fell on deaf ears in the Development Management Department!

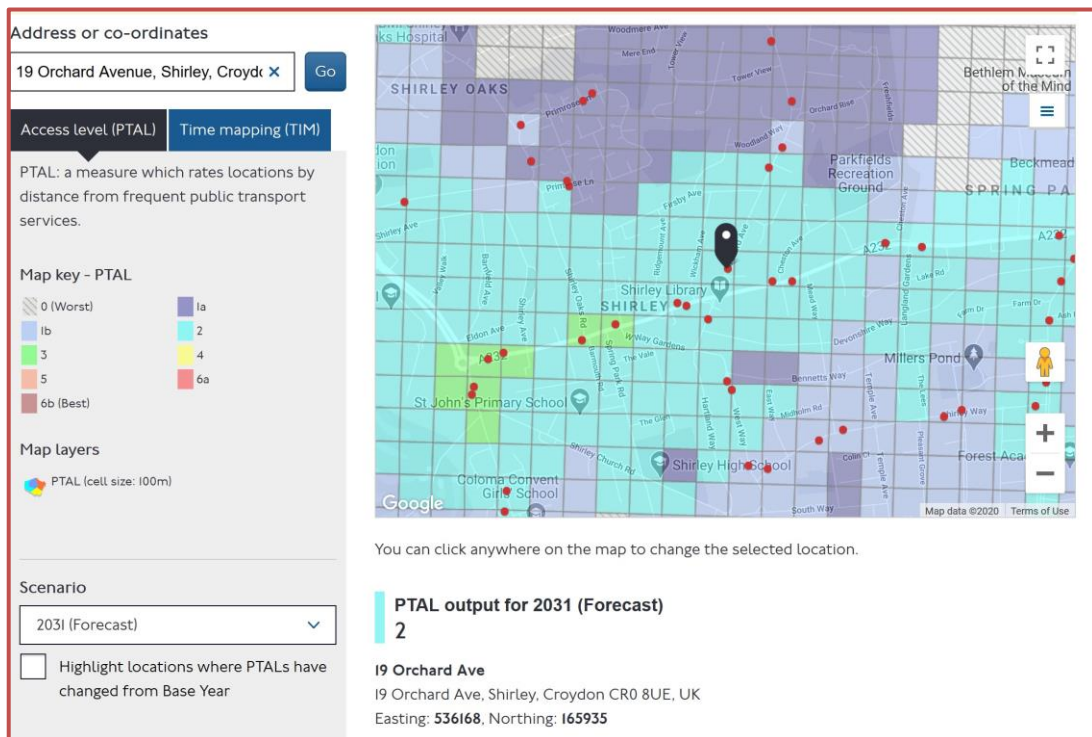
This new policy aligns with the draft emerging London Plan which defines limitations of Incremental Intensification which states at para 4.2A.1:

“Incremental Intensification of existing residential areas within PTALs 3-6 or within 800m distance of a station or town centre boundary is expected to play an important role in contributing towards the housing targets for small sites ...”

And the NPPF Para 122. Achieving appropriate densities:

122. Planning policies and decisions should support development that makes efficient use of land, taking into account:

- a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
- b) local market conditions and viability;
- c) **the availability and capacity of infrastructure and services – both existing and proposed** – as well as their potential for further improvement and the scope to promote sustainable travel modes **that limit future car use**;
- d) the desirability of maintaining an area’s **prevailing character** and **setting (including residential gardens)**, or of promoting regeneration and change; and the importance of securing well-designed, attractive and healthy places.



TfL WebCAT showing PTAL of 2 at 19 Orchard Avenue forecast to 2031

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The location of this proposal is PTAL 2 and will remain at 2 for the foreseeable future and is NOT within 800m of a train station or within 800m of the Croydon Town Boundary and therefore is unsuitable for Incremental Intensification.

Shirley is considered a “**Suburban Residential Area**” outside the **Urban Shopping Parades** as confirmed by Croydon Local Plan “**Shirley Place**” paras and 11.199, 11.200 – **Homes**.

11.199 Shirley will continue to be a **suburb** surrounded by substantial green space with improved cycle and pedestrian links. The vibrant Local Centre, with a range of **retailing and independent shops** will continue to serve the local community.

Homes

11.200 An area of sustainable growth of the **suburbs** with some opportunity for windfall sites will see growth mainly confined to infilling with dispersed integration of **new homes respecting existing residential character and local distinctiveness**.

Character, Heritage and Design

11.202 New development will be **sensitive to the existing residential character** and the wooded hillsides of the Place referring to the Borough Character Appraisal to inform design quality. Public realm improvements will focus on the Local Centre. Any building and conversions should be of a high standard of design to ensure the character of the Centre is respected.

Proposed Development Parameters:

19 Orchard Avenue - Application			Ref: 20/03721/FUL		Residential Density			400 hr/ha		
Site Area		600	sq.m		Residential Density			516.67	bs/ha	
Site Area		0.06	ha		Housing Density			150	units/ha	
	Floor	Habitable Rooms (*)	Bedrooms	Bed Spaces	Storage Space (sq.m.) Offered	Table 3.3 Storage (sq.m.)	GIA (sq.m.) Offered	Table 3.3 GIA (sq.m.)	Amenity Space (sq.m.)	Private Amenity required (sq.m.)
Unit 1	Ground	5	3	5	Not Stated	2.5	Not Stated	93.00	8	8
Unit 2	Ground	4	2	4	Not Stated	2	Not Stated	70.00	9	7
Unit 3	First	5	3	5	Not Stated	2.5	Not Stated	93.00	7	8
Unit 4	First	4	2	4	Not Stated	2	Not Stated	70.00	7	7
Unit 5	Second	3	1	2	Not Stated	1.5	Not Stated	50.00	5.5	5
Unit 6	Second	3	1	2	Not Stated	1.5	Not Stated	50.00	6.5	5
Unit 7	Second	3	1	2	Not Stated	1.5	Not Stated	50.00	5	5
Unit 8	Third	4	2	4	Not Stated	2	Not Stated	70.00	6.5	8
Unit 9	Third	4	2	3	Not Stated	2	Not Stated	61.00	5.5	6
Totals		24	12	31		17.5		376.00	60	59
Average		2.67	1.33	3.44	0.00	1.94	0.00	41.78	6.67	6.56
(*) Dining/lounge/kitchen open plan classed as two habitable rooms										

The current status of the emerging **Draft London Plan** is the “Consolidated changes version– (Clean) dated July 2019 draft replacement **Policy D1A Infrastructure requirements for sustainable densities** and **Policy D1B Optimising site capacity through the design-led approach** (replacing the previous draft Policy D6), which should be considered as a proposed replacement policy, including the requirement of defining a new methodology and evaluation criteria to meet the requirements of the new Policy objectives as set out in Draft Policy D1A & D1B - London’s form, character and capacity for growth, Policy D2 - Delivering good design, Policy D3 - Inclusive design & Policy D4 - Housing quality and standards and Policy D5 Accessible housing.

It is understood that Croydon LPA have not yet prepared to consider the emerging **new London Plan Policies** for **Optimising Housing Potential**. It is therefore assumed the **current adopted Policy is still the only available policy to determine Residential and Housing Densities**, as the methodology and evaluation criterion required for the new draft London Plan Policy has not been developed by Croydon LPA which are necessary to implement the new policies.

Analysis of proposal against current Adopted Planning Policies

London Plan 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.**”

3.28 A rigorous appreciation of housing density is crucial to realising the optimum potential of sites, but it is only the start of planning housing development, not the end. It is not appropriate to apply Table 3.2 mechanistically. Its density ranges for particular types of location are **broad**, enabling account to be taken of **other factors** relevant to optimising potential—local context, **design and transport capacity are particularly important**, as well as social infrastructure (Policy.3.16), open space (Policy 7.17) and play (Policy 3.6). These **broad ranges** also provide the framework within which boroughs can refine local approaches to implementation of this strategic policy through their LDFs ^[1]. Where appropriate, they can also provide a tool for increasing density **in situations where transport proposals will improve public transport accessibility in the future**. It is important that higher density housing is not automatically seen as requiring high rise development.”

3.28A Geographically specific guidance on implementation of policy 3.4 is provided for Opportunity and Intensification Areas in paragraphs 2.61 and 2.62; for Town Centres in Policy 2.15 and paragraphs 2.72B –2.72H and 4.42A-B; for surplus industrial land in paragraphs 2.85 and 4.23 and for other large housing sites in paragraph 3.42. More general guidance on implementation of Policy 3.4 is provided in the Housing SPG including **exceptional circumstances where densities above the relevant density range may be justified**.

3.29 The form of housing output should be determined primarily by an assessment of housing requirements and not by assumptions as to the built form of the development. While there is usually scope to provide a mix of dwelling types in different locations, higher density provision for smaller households should be focused on areas with good **public transport accessibility** (measured by Public Transport Accessibility Levels (PTALs), and **lower density development is generally most appropriate for family housing**.

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

[1] **The Croydon Local Plan LDF does not give ANY guidance on densities, massing etc.**

of this policy in different circumstances including mixed use development, taking into account plot ratio and vertical and horizontal mixes of use.”

The locality of the proposed development is defined in the **Croydon Local Plan “Shirley Place” DM45.1 as “Suburban”**.

It is outside the **Local Centre Shopping Area** (designations as shown in the Policies Map above).

Table 3.2 Sustainable residential quality (SRQ) density matrix (habitable rooms and dwellings per hectare)			
Setting	Public Transport Accessibility Level (PTAL)	Public Transport Accessibility Level (PTAL)	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 (2.67 hr/unit)	50–75 u/ha	50–95 u/ha	70–130 u/ha
Urban	150–250 hr/ha	200–450 hr/ha (400 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 (150 u/ha)	70–260 u/ha

From this information, it is concluded therefore, from the Shirley Place Policies, that the applicant has **assumed** the location to be an **“urban”** setting whereas it is actually in a **“Suburban”** setting but in close proximity to a **Local Urban Primary Shopping Area** (see policies map above).

The **Residential Density** of the proposed development is $24/0.06 = 400.00\text{hr/ha}$. The **PTAL** for the locality is **2** which, for a **suburban setting**, should be in the suburban range of **150 to 250 hr/ha**. Also, the **Residential Density** should be at the **lower end of the range** as recommended by the policy (**para 3.30 above**) **unless qualified by justification**.

Assuming the Incremental Increase within the PTAL and Density Ranges defined in the London Plan Policy 3.4 – Density Matrix Table 3.2, are approximately Linear, then the Densities should follow the linear straight-line graph of:

$$y = mx + c \text{ where } m = (\Delta y / \Delta x) = \text{slope, } y = \text{Density, } x = \text{PTAL and } c = y \text{ intercept when } x = 0$$

Then for a **Suburban** setting:

$$m = (\Delta y / \Delta x) = (250 - 150) / (3 - 2) = 100 / 1 = 100$$

And, **C** is found by adding the known two max and min values:

$$\begin{aligned} \text{i.e. } 250 &= 100 \times 3 + c = 250 = 300 + c \\ 150 &= 100 \times 2 + c = 150 = 200 + c \\ 400 &= 500 + 2c \\ -100 &= 2c \\ c &= -100/2 \quad c = -50 \end{aligned}$$

The required PTAL for this Residential Density is found by:

$$\begin{aligned} \text{Residential Density} = 400.00 &= \left(\frac{\Delta y}{\Delta x}\right)x + (-50) \\ 400.00 &= (100)x \\ 400 + 50 &= 100x \\ x &= 4.5 = \text{PTAL} \end{aligned}$$

Which means the required PTAL is **4.5** i.e. exceeding the maximum in the range of **2 to 3** when the local **PTAL is just 2**. **(With no justification for this increased density offered).**

Similarly for the Housing Density:

The **Housing Density** of the proposed development is $9/0.06 = 150 \text{ units/ha}$. At an average habitable rooms per Unit of **2.67hr/unit**, for a suburban setting the Housing Density should be in the range **50 to 95 units/ha** and nearer **50** at PTAL **2** in a “suburban setting” when using: $y = mx + c$

where $m = (\Delta y / \Delta x)$ = slope, y = **Housing Density**, x = PTAL and c = y intercept when $x = 0$.

$$m = (95-50)/(3-2) = 45/1 = 45 \quad m = 45$$

c is found by the known max & min equations:

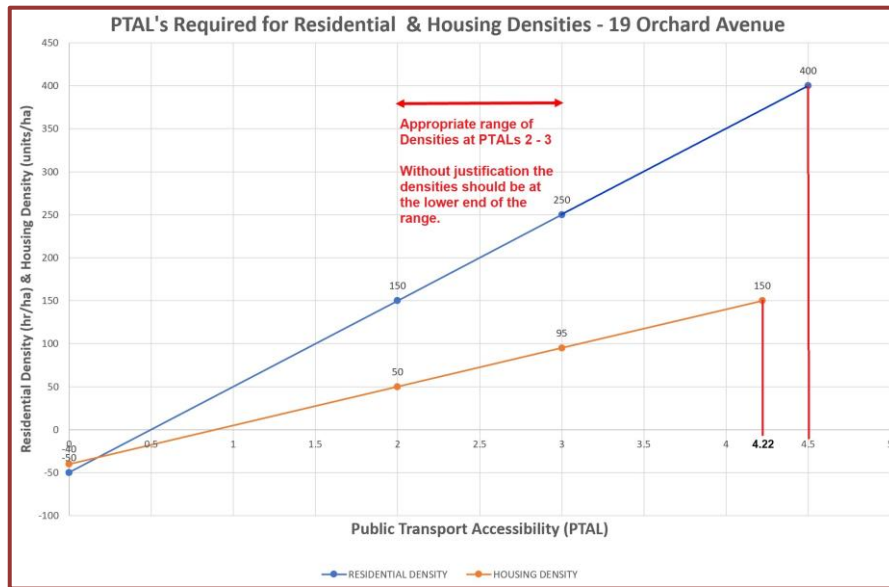
$$\begin{aligned} \text{i.e.} \quad 95 &= 45 \times 3 + c = 95 = 135 + c \\ 50 &= 45 \times 2 + c = 50 = 90 + c \\ 145 &= 225 + 2c \\ -80 &= 2c \\ c &= -80/2 \\ c &= -40 \end{aligned}$$

The required PTAL for this Housing Density is found by:

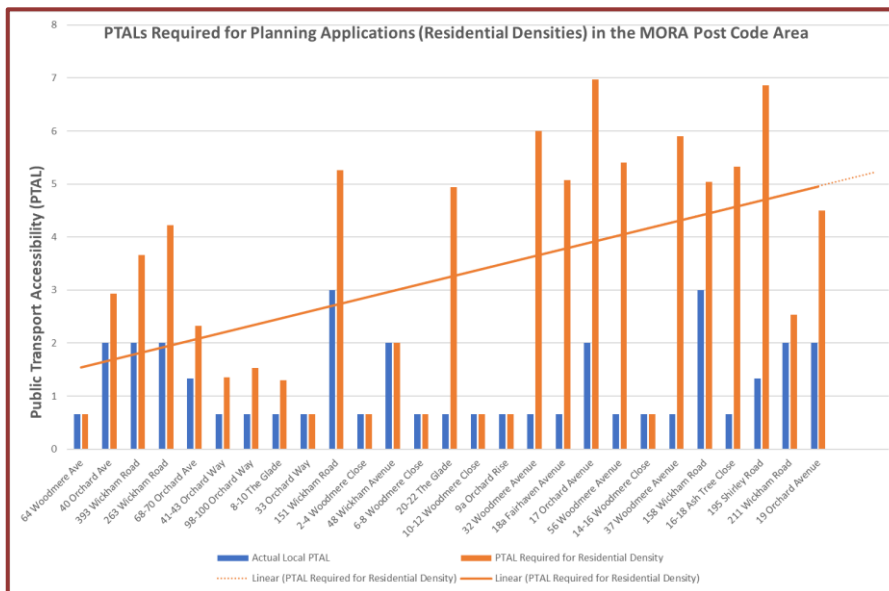
$$\begin{aligned} \text{Housing Density is } 150 &= 45x + (-40) \\ 190 &= 45x \\ x &= 190/45 = 4.22 = \text{PTAL} \end{aligned}$$

Thus, the PTAL required for Housing Density of **150 u/ha** is **4.22** when the actual PTAL is just **2**.

See graph below:



We object to this proposal on grounds of **significant overdevelopment** for the locality if classified as a “suburban setting” at Residential Density of **400 hr/ha** and Housing Density of **150 units/ha** at an average of **2.67hr/unit**. So, this proposed development is an **OVERDEVELOPMENT** for a **Suburban setting at PTAL 2** and forecast to remain at PTAL 2 until at least 2031. These Residential and Housing Densities are more appropriate to an “Urban” Setting as can be seen at Table 3.2 above (marked in RED).



This Histogram shows the cumulative effect of recent in-fill and Redevelopments, Residential Densities and the actual required PTALs in the MORA Post Code Area showing the trending toward a PTAL of 6 (indicating significant cumulative over-developments for the available & planned Infrastructure).

This histogram also gives a clear indication of the **cumulative effect** of **NOT** implementing London Plan Policy 3.4 – Optimising Housing Potential, over recent years to the detriment of local residents as the area has now **“unsustainable access to Public Transport”**.

The Monks Orchard Post Code Area has a single bus route 367 and is a single decker service through a residential area, within a road network which is not suitable for large double decker buses.

The Wickham Road (A232) is getting very congested (Pre Covid-19 lockdown) and approaching severe grid-lock at peak periods and there is little that can be done to remedy this situation.

The locality has not seen any improvement of infrastructure from **Community Infrastructure Levy (CIL)** contributions from **any recent developments** and therefore the ‘CIL’ collected has not contributed to any improvement in Shirley Wards’ locality’s lack of services and infrastructure.

We object to this proposed development on grounds of excessive **Residential and Housing Densities** for a **Suburban Setting** as defined in the current adopted **London Plan Policy 3.4 - Optimising Housing Potential, Table 3.2** and **DM45.1 – The Shirley Place** at locality of **PTAL 2** when the Densities would require **PTALs** exceeding the maximum **Residential Density** at a numerical value of **4.5** and a **Housing Density of 4.22**.

There are no other available adopted Policies in the Croydon Local Plan to meet the NPPF requirements of para 16 d) or Para 122 - Achieving Appropriate Densities.

London Plan Policy 3.5 Quality and design of housing developments.

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.

Table 3.3 - Minimum space standards for new dwellings					
Number of bedrooms	Number of bed spaces	Minimum GIA (m ²)			Built-in storage (m ²)
		1 storey	2 storey	3 storey	
		dwellings	dwellings	dwellings	
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	

London Plan Table 3.3 Minimum Space Standards for New Dwellings

The Applicant has **NOT** supplied **any details** to confirm or otherwise whether the application meets the required “**Minimum Accommodation Space Standards**” both the **Minimum GIA** or **Built-In Storage** as defined in the current adopted **London Plan Policy 3.5 Quality and Design of Housing Developments, Table 3.3**.

The **Private Amenity Space** proposed for **Units 3, 8 & 9** do **NOT** meet the **Minimum Requirements** for the **size of the Units** (at 5m² for the first 2 occupants plus an additional 1m² for every additional occupant).

We therefore object to this proposed development on grounds of **non-compliance** to **London Plan Policy 3.5 Quality and design of housing developments Table 3.3 Minimum Space Standards for New Dwellings**, as the appropriate information has **NOT** been provided.

London Plan Policy 6.11 Smoothing traffic flow and tackling congestion

A The Mayor wishes to see DPDs and Local Implementation Plans (LIPs) take a coordinated approach to **smoothing traffic flow** and **tackling congestion** through implementation of the recommendations of the Roads Task Force report.

The proposed development locality has **PTAL of 2** at base year and is forecast to remain at **PTAL 2** until at least **2031**. As this location is adjacent to **RED ROUTE** parking restrictions, we believe that off-street parking availability is paramount and that the guidance in the London Plan for Residential Parking Policy should be adopted to prevent any requirement for overspill **on-street parking** as a result of this proposed development. **The proposed parking availability of 4 spaces and zero disabled bays is unacceptable at this location.**

We object to this proposed development on grounds of inadequate off- street parking at a locality adjacent to Red Route restricted parking which will require overspill on-street parking to be a significant distance from the development and cause local congestion along this feeder road which provides the **367-bus route** and the link between the **A232** and the **A222**.

London Plan Policy 6.13 Parking

Policy

Strategic

A The Mayor wishes to see an appropriate balance being struck between promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use.

B The Mayor supports Park and Ride schemes in outer London where it can be demonstrated they will lead to overall reductions in congestion, journey times and vehicle kilometres.

Planning decisions

C The maximum standards set out in [Table 6.2](#) in the Parking Addendum to this chapter **should be the basis for considering planning applications** (also see Policy [2.8](#)), informed by policy and guidance below on their application for housing in parts of **Outer London with low public transport accessibility (generally PTALs 0-1)**.

D In addition, developments in all parts of London must:

a ensure that **1 in 5 spaces** (both active and passive) **provide an electrical charging point** to encourage the uptake of electric vehicles

b provide parking for disabled people in line with [Table 6.2](#)

c meet the minimum cycle parking standards set out in [Table 6.3](#)

d provide for the needs of businesses for delivery and servicing.

The **London Plan Policy 6.13 Table 6.2 Residential Parking Standards** at **Residential Density** in the range **159 hr/ha to 250 hr/ha** and **Housing Density** in the range **50 u/ha to 95 u/ha** requires up to **1.5 car parking spaces per dwelling** which equates to **7.5 spaces**. However, there are only **4 car parking spaces provided**.

At the **appropriate** ranges of **Residential & Housing Densities** at this **Suburban Setting** at **PTAL 2** with an average of **2.67 hr/u** at a **recommended Residential Density** of **150 to 250 hr/ha** and **Housing Density** of **50 to 95 u/ha**, the **current London Plan Policy 6.13** Table 6.2 **Car Parking Standards Recommends** up to **1.5 spaces per Unit** thus requiring **13.5 car parking spaces** for this development proposal.

It is noted that the emerging **Draft New London Plan at Table 10.3** has reduced residential parking at Outer London Boroughs at **PTAL 2** to up to **1 space** per dwelling which would require **9 spaces**. However, this Draft Plan is subject to **Examination in Public (EiP)** by the **Planning Inspectorate** and is unlikely to be adopted until **late 2020/early 2021**.

There is no legislation to prevent car ownership or to restrict occupants from owning light vans for commercial business activities which requires local parking overnight. We therefore object to this proposed development on grounds of inadequate parking provision of only **4 bays** with allocation of only **0.22 bays per assumed adult occupants**, in a locality of **PTAL 2** and at an area of local parking high stress.

RESIDENTIAL CAR PARKING STANDARDS

Table 6.2 Car parking standards

Parking for residential development

	PTAL 0 to 1		PTAL 2 to 4		PTAL 5 to 6	
Suburban	150–200 hr/ha	Parking provision	150–250 hr/ha	Parking provision	200–350 hr/ha	Parking provision
3.8–4.6 hr/unit	35–55 u/ha	Up to 2 spaces per unit	35–65 u/ha	Up to 1.5 spaces per unit	45–90 u/ha	Up to one space per unit
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	
Urban	150–250 hr/ha		200–450 hr/ha		200–700 hr/ha	
3.8–4.6 hr/unit	35–65 u/ha	Up to 1.5 spaces per unit	45–120 u/ha	Up to 1.5 spaces per unit	45–185 u/ha	Up to one space per unit
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	
Central	150–300 hr/ha		300–650 hr/ha		650–1100 hr/ha	
3.8–4.6 hr/unit	35–80 u/ha	Up to 1.5 spaces per unit	65–170 u/ha	Up to one space per unit	140–290 u/ha	Up to one space per unit
3.1–3.7 hr/unit	40–100 u/ha		80–210 u/ha		175–355 u/ha	
2.7–3.0 hr/unit	50–110 u/ha		100–240 u/ha		215–405 u/ha	

Maximum residential parking standards

number of beds	4 or more	3	1–2
parking spaces	up to 2 per unit	up to 1.5 per unit	less than 1 per unit

Notes:

All developments in areas of good public transport accessibility (in all parts of London) should aim for significantly less than 1 space per unit

Adequate parking spaces for disabled people must be provided preferably on-site³

20 per cent of all spaces must be for electric vehicles with an additional 20 per cent passive provision for electric vehicles in the future.

In outer London areas with low PTAL (generally PTALs 0–1), boroughs should consider higher levels of provision, especially to address ‘overspill’ parking pressures.

Current Adopted London Plan Policy 6.13 – Residential Parking Standards

We therefore object to this proposed development on grounds of inadequate parking provision in a Suburban setting of **PTAL 2** of only four Parking Bays when the **current London Plan Policy 6.13** requires up to **1.5** space at **PTAL 2** and at a recommended Residential Density of **150hr/ha** & recommended Housing Density of **50 units/ha** which equates to **13.5** Parking Bays for **9** dwellings.

Also, there are **no swept path illustrations** to prove that an **egress manoeuvre** is possible if parked in a forward direction, in a forward gear if all other 3 bays are full – to exit in a forward gear across the footpath and into Orchard Avenue.

Also, there are **NO Sight Lines** to ensure safe exit over the footpath and into **Orchard Avenue** and therefore **should be refused**. **Orchard Avenue has a high footfall of pedestrians, including children travelling to the two schools in close proximity.**

Croydon Plan **DM10: Design and Character**

DM10.1 Proposals should be of high quality and, whilst seeking to achieve a minimum height of 3 storeys, should respect:

- The development pattern, layout and siting;
- The scale, height, massing, and density;**
- The appearance, existing materials and built and natural features of the surrounding area; the Place of Croydon in which it is located.

The council will take into account cumulative impact.

However, The **Croydon Local Plan DOES NOT** provide **any guidance** on the appropriate **scale, massing or Densities** for any **Designated Localities** or **PTAL's** as required of **NPPF 16 d)** and **para 122. Achieving appropriate densities**:

16. Plans should:

- contain policies that are **clearly written and unambiguous**, so it is evident how a decision maker should react to development proposals;

Achieving appropriate densities

122. Planning policies and decisions should support development that makes efficient use of land, taking into account:

- the availability and capacity of **infrastructure and services** – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
- the desirability of maintaining an area's **prevailing character and setting** (including residential gardens), or of promoting regeneration and change; and

Therefore, the only guidance on these parameters is the current **London Plan Policy 3.4 – Optimising Housing Potential** and the **Density Matrix at Table 3.2** which we have commented on above.

DM10.2 Proposals should create clear, well defined and designed public and private spaces. **The Council will only consider parking within the forecourt of buildings in locations where the forecourt**

parking would **not cause undue harm to the character or setting of the building and where forecourts are large enough to accommodate parking and sufficient screening without the vehicle encroaching on the public highway.** The Council will support proposals that incorporate cycle parking within the building envelope, in a safe, secure, convenient and well-lit location. Failing that, the council will require cycle parking to be located within safe, secure, well lit and conveniently located weather-proof shelters unobtrusively located within the setting of the building.

The parking provision is all on the **forecourt** of the proposed development which is **contrary to Policy DM10.2**. There are no **Swept path diagrams** to illustrate ingress and egress for any of the parking bays if all other bays are full and how if entered in a forward gear, vehicles could exit onto the busy Orchard Avenue in a forward gear. The case officer should request the applicant to provide swept path diagrams for each bay when all other bays are full, to illustrate how and whether this could be achieved with minimal negotiating manoeuvres.

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 5m² per 1-2 person unit and an extra 1m² per extra occupant thereafter;**

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.

Our comments relating to accommodation standards are given in response to London Plan Policy 3.5 above which lists the **non-compliance to GIA, Built -In Storage and Private Amenity Space** requirements.

Policy DM10.5 The actual **Communal Open Space** is stated as **185m² which equates to 20.5m² per occupant.**

The **Croydon Local Plan Policy** does **NOT** specify the appropriate 'allocation' of "**communal outdoor amenity space**" and therefore the policy is **NOT deliverable** and the policy is **NOT compliant** to **NPPF para 16**. Without specifying the "**allocation per occupant**", the **Croydon Local Plan** at **DM10.5** is **NOT deliverable** as it does not provide **adequate guidance for applicants** to meet the policy and the policy does **NOT** meet the guidance required by **NPPF Para 16 d).**

London Plan Policy 3.6 Play Spaces for Children

A The Mayor and appropriate organisations should ensure that **all children and young people have safe access to good quality, well-designed, secure and stimulating play** and informal recreation provision, incorporating trees and greenery wherever possible.

Planning decisions

B Development proposals that include housing should make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs.

The London Plan provides an interactive spreadsheet, for calculating Play Space for children, the Play Space Area required for 13 children of Flatted Developments is **10.9m²**. This proposed development has no defined allocated area for **Play Space for Children**. It just provides a play house with slide located in the communal amenity area.

We therefore object to this proposed development on the grounds that there is no allocated Play partitioned Space for Children of the future occupants and should therefore be refused.

DM10.6 The Council will support proposals for development that ensure that;

- a. The amenity of the **occupiers of adjoining buildings** are **protected**; and that
- b. They do not result in **direct overlooking** at close range or habitable rooms in main rear or private elevations; and that
- c. They do not result in direct overlooking of **private outdoor space** (with the exception of communal open space) within **10m perpendicular** to the rear elevation of a dwelling; and that
- d. Provide adequate **sunlight and daylight to potential future occupants**; and that
- e. They do not result in significant loss of existing sunlight or daylight levels of adjoining occupiers.

SPD2 Chapter 2 – Suburban Residential Development

SPD2 Para 2.11 requires **Height of projection** of neighbouring properties should be no greater than the intersection of the projected line at 45° as measured from the Centre of the closest habitable room on the ground floor rear of the neighbouring property. We have used the adjacent provided rear elevations which **clearly establishes** that the projected **45° line** is **not clear** of the **proposed structure** and thus **fails the Policy by a significant degree**.

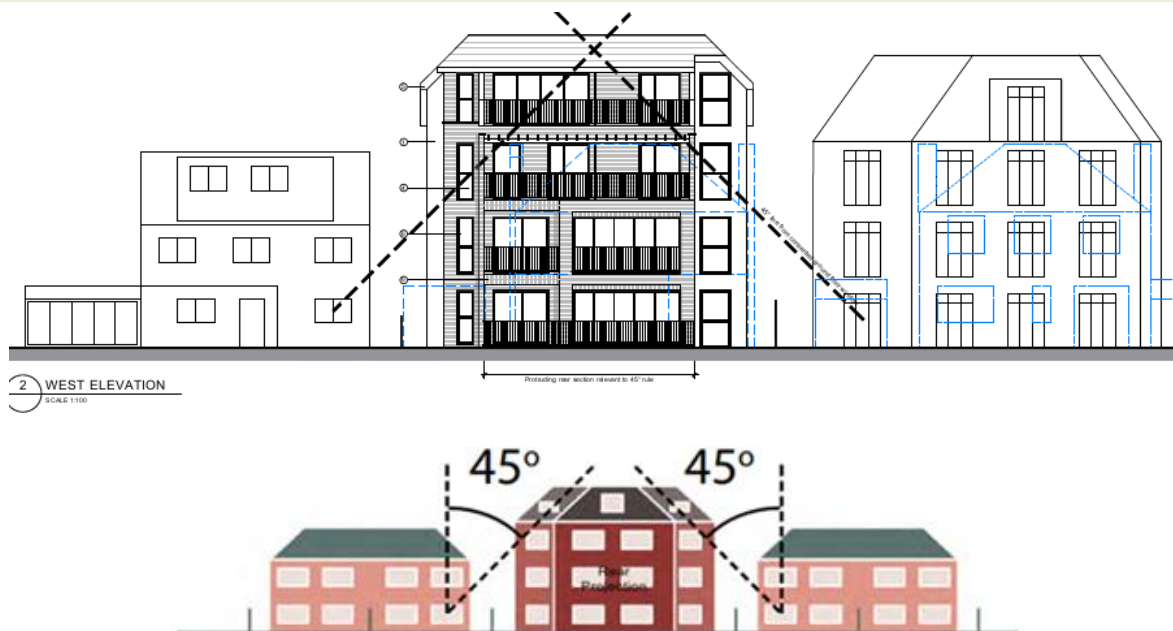


Figure 2.11c: Height of projection beyond the rear of neighbouring properties is no greater than 45 degrees as measured from the middle of the window of the closest habitable room on the rear of the neighbouring property.

Vertical 45° Degree Rule (Elevation)

**Representing, supporting and working with the local residents
for a better community**

We object to this proposed development as it **clearly fails** to meet the **design guide** requirement of **SPD2 Chapter 2 – Suburban Residential Development** section **2.11c** which requires **clearance of the projected 45° Rule from the centre ground floor rear window of adjacent properties**. This proposed development significantly fails this **45° Rule** for both adjacent properties and **therefore this proposal should be refused**. This **45° Degree vertical rule** is totally independent of the daylight and sunlight requirements (as the policy indicates “also” in the definition which indicates the two policies are “mutually exclusive”).

DM10.11 In the locations described in Table 6.3 and shown on the Policies Map as areas of focussed intensification, new development may be significantly larger than existing and should;

- Be up to double the predominant height of buildings in the area
- Take the form of character types “Medium-rise block with associated grounds”, “Large buildings with spacing”, or “Large buildings with Continuous frontage line”
- Assume a suburban character with spaces between buildings.

Developments in focussed intensification areas should contribute to an increase in density and a gradual change in character. They will be expected to enhance and sensitively respond to existing character by being of high quality and respectful of the existing place in which they would be placed.

However, see extract from Sarah Jones letter at page 3 of this submission.

The **Table 6.4** designations of “accommodating growth” are not defined with any parameters regarding **Scale, Massing and Density** and there is no **delineating guidance between the designations as required** by the New **NPPF para 16 d)**, or **Para 122 Achieving Appropriate Densities**. Also, **SPD2** also does **NOT** indicate any limits to increased densities so in actual fact there is **no policy mechanism** to **manage the appropriate density of proposals** other than the **current London Plan Policy 3.4 Optimising Housing Density**. It is **NOT** clear how this proposal will allow **more efficient use of infrastructure** or in **what respect has the locality sufficient capacity for growth?**

We therefore **object to this proposed development** on grounds of there being no quantifiable definition of **DM10.11** as required by **NPPF para 16 d)** and **NPPF Para 122 Achieving Appropriate Densities** for “**Focussed Intensification**” to allow most efficient use of available infrastructure or capacity for growth, resulting in an overdevelopment as defined by the **London Plan Policy 3.4 Table 3.2**. This application is **non-compliant** to the definition of “**incremental intensification**” as defined in the **New Draft emerging London Plan Policy** for “**Incremental intensification**” given at **para 4.2A.1** which defines **Incremental intensification** areas to be within **PTALs 3-6** and within **800m of a rail station or town centre boundary**. This location is at **PTAL 2** and is way over **800m** of any rail station or Croydon town centre boundary and should therefore be refused as referenced in **Sarah Jones’ MP - letter relating to change of Policy for Shirley intensification (see page 3 above)!**

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:

- 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;
- Ensure facilities are **visually screened**;
- Provide **adequate space for the temporary storage of waste** (including **bulky waste**) materials generated by the development; and
- Provide layouts that ensure facilities are safe, **conveniently located and easily accessible by occupants, operatives and their vehicles**.

The Council Refuse & Recycling guidance included at:

<https://www.croydon.gov.uk/sites/default/files/articles/downloads/New%20build%20guidance.pdf> Gives requirements for new developments at **Section 4 - Flats with 5 or more units**.

As this Waste and Recycling Planning Policy Document was published in August 2015 and Edited in October 2018, it is not understood why the **Policy DM13** does NOT embody these requirements?

Para 4.2 of the Guidance states:

4.2 Internal Storage To enable and encourage occupants of new residential units to recycle their waste, developers should provide adequate internal storage, usually within the kitchen, for the separation of recyclable materials from other waste. It is recommended that developers consider methods to integrate the reusable sacks and 9ltr caddies for recycling into the design of the kitchen areas to enable and encourage residents to make full use of them.

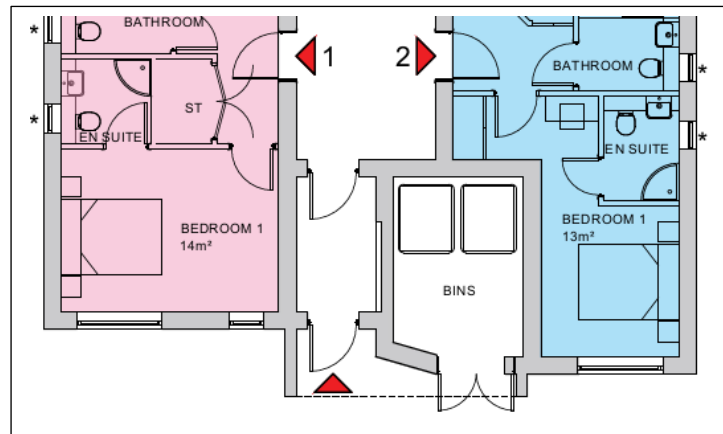
There is no specified allocation of recycling storage for any kitchen of the 9 Units shown on the supplied plans.

The capacity of the refuse bins for 9 units is inadequate.

It is understood that there must be a minimum of **150mm clearance** around and between each bin within a storage area. Where there is more than **one bin** within a storage area, there must be **2m clearance in front of each bin** to enable it to be accessed and safely moved without needing to move any of the other containers.

It is also understood that the **access doors** to the bin storage must **not open outward** over a **public footway or road**, and should **not** cause any **obstruction** to other accesses when in an open position. The proposed development Refuse Storage doors **DO open outwards**.

The requirement of a water supply, with standard tap fittings, to be available to the bin storage area to enable washing down of the bins, walls and floor, is not shown on the plans.



We therefore **object** to this proposed development on grounds that it does **NOT** fully meet the **capacity** requirements of **Policy DM13** or **Council Guidance on Refuse & Recycling for New Developments** as published by **Croydon Council** with regard to **Storage Area Capacity, Access and location within the building envelope**.

Policy DM29: Promoting sustainable travel and reducing congestion

To promote sustainable growth in Croydon and reduce the impact of traffic congestion development should:

- a. Promote measures to increase the use of public transport, cycling and walking;
- b. Have a positive impact and must not have a detrimental impact on highway safety for pedestrians, cyclists, public transport users and private vehicles; and
- c. Not result in a severe impact on the transport networks local to the site which would detract from the economic and environmental regeneration of the borough by making Croydon a less accessible and less attractive location in which to develop.

10.33 The extent of the local public transport network includes bus routes within a 10-minute walk, tram routes and train stations within a 15-minute walk and cycle and walking routes within 15-minutes of the development. The exact extent of the local transport networks should be considered in the Transport Assessment.

The additional **cumulative local developments** require reassessment of local bus service provision (**see also the histogram at page 9**) as residents are converting to other modes of transport to avoid this passenger congestion which is a preference for car usage **which should be avoided**.

Recent piecemeal redevelopments and infill developments in the MORA Post Code area has increased local residential population by **633**. To meet these increases in Residential Densities requires a **proportionate increase in PTAL** in the locality as highlighted in the histogram at page 9 and defined in Policy para **11.205**.

The Ward is served by a single decker **367 Bus Route** from West Croydon to/from Bromley via Shirley Oaks Village. This Bus Route is becoming heavily congested at peak times and the increase in Residential Densities resultant from cumulative piecemeal developments is causing local passenger frustration. An additional **Bus Service 689** has been introduced to serve local



schools, specifically for the school run and specifically for school children as the **367** single decker could not cope during the school run congestion period.

The 367 Buses vary between 20min and 30min intervals depending on time of day and capacity.

Location	Reference	Date of approval	Existing Dwellings	Approx Existing Occupants	New Proposed Dwellings	Habitable Rooms (hr)	New Bed Spaces or Occupants	Additional Occupants	Site Area (ha)	Average Habitable Rooms per Unit (Avg hr/u)	Appropriate Housing Density (u/ha) for Local PTAL	Appropriate Residential Density (hr/ha) for Local PTAL	New Housing Density (u/ha)	New Residential Density (hr/ha)	PTAL Required for Residential Density	Actual Local PTAL	Residential Density (bs/ha)*	Car Parking	Car Parking per Occupant
64 Woodmere Ave	15/01507/P	10/07/2015	1	4	5	30	26	22	0.29	6.00	56.5	183	17.24	103.45	0.66	0.66	89.66	14	0.5385
40 Orchard Ave	15/03885/P	10/11/2015	1	2	8	30	24	22	0.1236	3.75	37.5	150	64.75	242.82	2.93	2	194.25	9	0.375
393 Wickham Road	16/00274/P	04/08/2016	1	5	7	24	22	17	0.0758	3.43	40	150	92.35	316.62	3.66	2	290.24	7	0.3182
263 Wickham Road	15/04417/P	16/08/2016	1	5	8	24	24	19	0.0646	3.00	80	216.66	123.88	371.63	4.22	2	371.63	9	0.38
68-70 Orchard Ave	16/01838/P	07/09/2016	2	4	9	68	64	60	0.3128	7.56	48.3	194.33	28.77	217.39	2.32	1.33	204.6	18	0.28
41-43 Orchard Way	16/04935/FUL	20/01/2017	2	4	9	32	32	28	0.147	3.56	56.5	183	61.22	217.69	1.35	0.66	217.69	9	0.28
98-100 Orchard Way	16/03808/P	27/02/2017	2	4	9	31	34	30	0.137	3.44	56.5	183	65.89	226.28	1.53	0.66	248.18	9	0.26
8-10 The Glade	17/00262/FUL	27/04/2017	2	4	9	30	30	26	0.1396	3.33	56.5	183	64.87	214.96	1.30	0.66	214.9	9	0.30
33 Orchard Way	17/03233/FUL	17/01/2018	0	0	1	5	5	5	0.0601	5.00	56.5	183	16.64	83.19	0.66	0.66	83.19	2	0.40
151 Wickham Road	19/04149/FUL	18/03/2020	1	Not Known	5	11	12	Not Known	0.0214	2.20	170.0	450	233.64	514.02	5.26	3	560.75	0	0.00
2-4 Woodmere Close	18/02746/FUL	09/08/2018	0	2	1	6	5	3	0.0367	6.00	56.5	183	27.25	163.49	0.66	0.66	136.24	10	2.00
48 Wickham Avenue	18/02734/FUL	21/09/2018	0	0	1	6	5	5	0.0764	6.00	35.0	150	13.09	78.53	2.00	2	65.45	1	0.20
6-8 Woodmere Close	18/03917/OUT	26/10/2018	0	0	1	6	6	6	0.04	6.00	56.5	183	25.00	150.00	0.66	0.66	150	4	0.67
20-22 The Glade	18/05928/FUL	01/02/2019	0	0	2	10	12	12	0.037	5.00	48.2	183	54.05	270.27	4.94	0.66	324.32	4	0.33
10-12 Woodmere Close	19/00051/FUL	27/02/2019	0	0	1	6	6	6	0.0378	6.00	56.5	183	26.46	158.73	0.66	0.66	158.73	4	0.67
9a Orchard Rise	18/06070/FUL	21/03/2019	1	0	9	32	41	41	0.2011	3.56	56.5	183	44.75	159.12	0.66	0.66	203.88	12	0.29
32 Woodmere Avenue	19/00783/FUL	20/06/2019	1	4	7	21	20	17	0.06	3.00	66.5	183	116.67	350.00	6.00	0.66	333.33	5	0.25
18a Fairhaven Avenue	19/01761/FUL	20/06/2019	1	Not Known	9	30	33	Not Known	0.1071	3.33	56.5	183	84.03	280.11	5.07	0.66	308.12	9	0.27
17 Orchard Avenue	19/00131/FUL	06/11/2019	1	Not Known	8	30	23	Not Known	0.071	3.00	56.5	183	112.68	422.54	6.97	2	253.52	4	0.17
56 Woodmere Avenue	19/01352/FUL	24/10/2019	1	Not Known	9	29	31	Not Known	0.095	3.22	56.5	183	94.74	305.26	5.40	0.66	336.84	9	0.29
14-16 Woodmere Close	19/01484/FUL	23/10/2019	0	0	1	6	5	5	0.0555	6.00	56.5	183	18.02	108.11	0.66	0.66	90.09	2	0.40
37 Woodmere Avenue	19/03064/FUL	26/09/2019	1	Not Known	8	30	26	Not Known	0.0875	3.75	56.5	183	91.43	342.86	5.91	0.66	297.14	8	0.31
158 Wickham Road	19/03279/FUL	waiting	1	Not Known	6	24	22	Not Known	0.0522	4.00	120.0	450	114.94	459.77	5.04	3	421.46	2	0.09
16-18 Ash Tree Close	19/04705/FUL	27/02/2020	2	Not Known	8	40	40	Not Known	0.1335	5.00	48.2	183	59.93	299.63	5.33	0.66	299.63	8	0.20
195 Shirley Road	19/06037/FUL	waiting	1	Not Known	9	29	30	Not Known	0.07	3.22	40.0	150	128.57	414.29	6.86	1.33	428.57	9	0.30
211 Wickham Road	20/00299/FUL	waiting	0	0	4	10	8	8	0.03	2.50	70.0	200	133.33	333.33	2.53	2	266.67	2	0.25
19 Orchard Avenue	20/03721/FUL	waiting	1	Not Known	9	24	31	Not Known	0.06	2.67	50.0	150	150.00	400.00	4.50	2	516.67	4	0.13
Total			24	38	163	624	617	324	2.277		1644.70	5371.99	1385.39	5297.01	63.471		6,549.07	183	8.68
Average									0.0843		60.91	244.18	62.97	240.77	2.89		242.56	8.714286	0.4133

Recent in-fill and Redevelopments in the MORA Post Code Area.

Policy DM30: Car and cycle parking in new development

To promote sustainable growth in Croydon and reduce the impact of car parking new development must:

- Reduce the impact of car parking in any development located in areas of good public transport accessibility⁹⁷ or areas of existing on-street parking stress;
- Ensure that the movement of pedestrians, cycles, public transport and emergency services is not impeded by the provision of car parking;**
- Ensure that highway safety is not compromised by the provision of car parking including off street parking where it requires a new dropped kerb on the strategic road network and other key roads identified on the Policies Map;**

The Croydon Local Plan for **Residential Parking** is more stringent than the **London Plan Policies** in that the **Policy** is as per **London Plan Table 6.2** however, **with no provision for higher levels of car parking in areas with low Public Transport Accessibility Levels**, which ignores the reasoning for additional parking provision to alleviate overspill on-street parking. Perhaps this is why Croydon is suffering increased traffic congestion in residential areas. As previously stated there is no legislation preventing car ownership or the ownership of light vans for business or commercial activities, many of which such vehicles are parked in local streets.

As detailed under London Plan Policy 6.13 we reiterate our objection on grounds of **Policy DM30** objecting to this proposed development on grounds of inadequate parking provision in an Urban Shopping Locality of **PTAL 2** of only **four Parking Bays** when the current **London Plan Policy 6.13** requires up to **1.5** space at **PTAL 2** and at a recommended Residential Density of **450hr/ha** & recommended Housing Density of **120units/ha** which equates to **12** Parking Bays for **8** dwellings and should therefore be refused.

Policy: Shirley (Place Specific Policies).

Homes

11.200 An area of sustainable growth of the suburbs with some opportunity for windfall sites will see growth mainly confined to infilling with dispersed integration of new homes **respecting existing residential character and local distinctiveness.**

Character, Heritage and Design

11.202 New development will be **sensitive to the existing residential character** and the wooded hillsides of the Place referring to the Borough Character Appraisal to **inform design quality**. Public realm improvements will focus on the Local Centre. Any building and conversions should be of a high standard of design to **ensure the character** of the Centre is respected.

Transport

11.205 With **improved access and links where possible**, the existing connectivity and **good public transport of Shirley will be maintained**. The community **will** enjoy better quality, **more frequent** and **reliable** bus services connecting with Croydon Metropolitan Centre. Travel plans will look to *ease congestion at peak times* in the Local Centres by encouraging walking, cycling or public transport especially for school journeys. **(Not actually so!)**

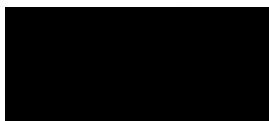
The proposed development is an overdevelopment for the locality and does **NOT respect the existing residential and housing densities** and therefore is non-compliant to **Policy: Shirley Place Homes para 11.200 & Character, Heritage and Design para 11.202.**

There has been **“absolutely no improved access or transport links”** in **Shirley** with increased residential occupancy of 380 persons resulting from in-fill and redevelopment and therefore the policy **Shirley Place Transport para 11.205 has NOT been fulfilled**

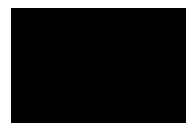
Please acknowledge receipt of this formal objection to this application to email address at: planning@mo-ra.co

Please inform us of your recommended decision in due course. Please register our comment as: **Monks Orchard Residents' Association (Objects)** on the comments tab of the LPA online public register.

Yours sincerely



Derek C. Ritson - I. Eng. M.I.E.T.
Monks Orchard Residents' Association.
Association.
(MORA Executive Committee - Planning).



Sony Nair – Chairman,
Monks Orchard Residents'

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



Cc:

Ms Nicola Townsend

Sarah Jones MP

Cllr. Sue Bennett

Cllr. Richard Chatterjee

Cllr. Gareth Streeter

Head of Development Management (LPA)

Croydon Central MP

Shirley North Ward Councillor

Shirley North Ward Councillor

Shirley North Ward Councillor

Bcc:

MORA Executive Committee

Chair of Shirley Planning Forum

Local affected residents