



To:

Mr Paul Young – Case Officer
Development and Environment
6th Floor
Bernard Weatherill House
8 Mint Walk
Croydon
CR0 1EA

Email: paul.young@croydon.gov.uk
dmcomments@croydon.gov.uk
Development.management@croydon.gov.uk

From:

**Monks Orchard Residents'
Association Planning**

11th September 2020

Emails: planning@mo-ra.co
chairman@mo-ra.co
hello@mo-ra.co

Reference	20/03932/FUL
Application Received	Tue 01 Sep 2020
Application Validated	Tue 01 Sep 2020
Address	75 Shirley Avenue Croydon CR0 8SP
Proposal	Erection of part single, part two storey side/rear and roof extensions to facilitate conversion of property into 5 residential units.
Status	Awaiting decision
Case Officer	Paul Young
Consultation close:	Sun 27 Sep 2020
Determination date:	Tue 27 Oct 2020

Dear Mr Young

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 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

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Policy 6.11 Smoothing traffic flow and tackling congestion

Policy 6.13 Parking

Draft London Plan Policies:

Policy H2A Small Housing Developments

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

Parameters for this proposal:

95 Shirley Avenue Ref: 20/03932/FUL						Residential Density		143.10 hr/ha		
Site Area	1188 sq.m.	PTAL	2011	2		Housing Density		42.09 units/ha		
	0.1188 ha	PTAL	2031	2		Residential Density		101.01 bs/ha		
	floor	habitable rooms (*)	bed rooms	bed spaces	GIA offered (sq.m.)	GIA Table 3.3	storage space offered (sq.m.)	Storage Space Table 3.3 (sq.m.)	amenity space offered (sq.m.)	amenity space required (sq.m.)
unit 1	ground	5	3	5	not stated	86	not stated	2.5	not stated	7
unit 2	ground	3	1	2	not stated	50	not stated	1.5	not stated	5
unit 3	first	3	1	2	not stated	37 (**)	not stated	1.5	not stated	5
unit 4	first	3	1	2	not stated	39	not stated	1.5	not stated	5
unit 5	second	3	1	1	not stated	37(**)	not stated	1	not stated	5
Total		17	7	12						27
Off Street Parking	2	Spaces per Occupant		0.17	Spaces per Adult		0.22			
(*) Kitchen/Loung/ Dining = 2 Habitable Rooms										
(**) Shower room instead of bathroom (see Table 3.3)										

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		

(*) Where a one person dwelling has a shower room instead of a bathroom, the floor area may be reduced from 39m² to 37m², as shown bracketed.

London Plan Policy 3.5 - Quality and design of housing developments

We object to this application on the following grounds:

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London Plan Policy 3.5 Quality and Design of Housing Developments

A Housing developments 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.

Planning decisions and LDF preparation

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**.

C LDFs should incorporate requirements for accessibility and adaptability^[1], **minimum space standards**^[2] including those **set out in Table 3.3**, and water efficiency^[3]. The Mayor will, and boroughs should, seek to ensure that **new development reflects these standards**. The design of all new dwellings should also take account of factors relating to 'arrival' at the building and the 'home as a place of retreat'. New homes should have **adequately sized rooms** and **convenient and efficient room layouts which are functional and fit for purpose**, meet the changing needs of Londoners over their lifetimes, address climate change adaptation and mitigation and social inclusion objectives and should be conceived and developed through an effective design process^[4].

D Development proposals which compromise the delivery of elements of this policy may be permitted if they are demonstrably of **exemplary design** and contribute to achievement of other objectives of this Plan.

Objection #1:

- a) The proposal clearly **DOES NOT** enhance the "quality of the local Place" as the rear elevation is totally unattractive and bears **NO** relationship to the character or physical context of adjacent or surrounding properties. (See Figs 1 & 2 below).



Fig 1 - New proposal rear elevation



Fig 2 - Existing Rear Elevation



- b) The Rear Elevation Showing the obnoxious proposed development's rear elevation is a most unattractively designed and roof structure with Stepped Horizontal and Vertical design, totally at odds with the existing surrounding structures and roof forms of rear elevations and roof forms of ALL surrounding localities.
- c) This rear elevation will have a detrimental effect for the life of the development as viewed from all adjacent and surrounding properties.
- d) The proposal clearly **DOES NOT** take any account of the needs of children of the future occupants as there is NO Allocation of Play Space for Children. (See Fig 3 below).

Draft London Plan Policies:

Policy H2A Small housing developments

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 set out in Table 4.2, particularly in outer London. The locality cannot support increased densities due to unsustainable public transport infrastructure.

Objection #2:

75 Shirley avenue is in a suburban setting and PTAL 2 which is forecast to remain at PTAL 2 at least until 2031 and it also significantly exceeds 800m from a train station and well over 800m from the Croydon Town Centre Boundary so outside an area suitable for incremental intensification as defined by the emerging new London Plan Policy H2A.

Objection #3:

- a) The proposal **DOES NOT** provide any details of required Gross Internal Area (GIA) provision so it is not possible to ensure the proposal meets the London Plan Minimum Space Standards for ALL New Dwellings as specified in Table 3.3. of policy 3.5 Quality and Design of Housing Developments (see Table 3.3 and Parameters above for this proposal).
- b) The proposal **DOES NOT** provide any details of required in-built storage capacity for any of the of the proposed units to meet the requirements of the London Plan Policy 3.5 table 3. 3.
- c) The proposal **DOES NOT** provide any Private Open Amenity Space for future occupants of Units 4 & 5 of the development proposal, as required of the policy or defined the Amenity Space Area for Units 1, 2 & 3, as required of the policy.
- d) There are NO provided justifications for NOT providing the policy requirements a) through to c) above, which are “demonstrably of exemplary



design” to mitigate not meeting the policy– in actual fact the design is of the most unattractive and unsuitable for the location and character of the area.

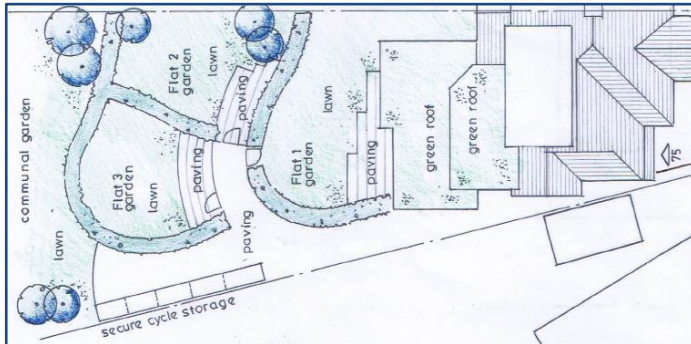


Fig 3 - Site illustration – there is no designated area for play space for children of the future occupants of this proposed development as required of the policy.

Suburban Design Guide SPD2 – Chapter 2

2.8 APPROACHES TO CHARACTER

2.8.1 Development proposals should **identify characteristics of the area** and how they have been responded to, in accordance with **Policy DM10** of the Croydon Local Plan.

Crucially, respond does not mean replicate and allows for **interpretation of existing character** to create something new **that enhances the area and its character**. In developing an **approach to character**, applicants should refer to **Section 2.7** of this guide to help identify the existing character.

2.8.2 The following three (3) broad approaches to **how to respond to local character in the design of new development have been identified**. Applicants should seek to follow one of the approaches below and will be expected to **justify why the particular approach that they take has been employed**, and how it is **manifested in the design of the proposal**.

These statement’s give further support to **Objection #1** as detailed above.

2.11 FORM OF PROJECTIONS EXTENDING BEYOND REAR BUILDING LINES

2.11.1 Where a development projects beyond a rear building line, the height and footprint of the projection does not necessarily need to be lower or narrower, provided the guidance on relationship to boundaries (Refer to Section 2.16) and overlooking (Refer to Section 2.9) is followed. It should be demonstrated that there would be **no unreasonable impact on neighbouring amenity**. Where it is necessary to mitigate impact on neighbouring amenity, **the projection beyond the rear building line may need to step down in height and width**, to meet the **guidance below**:

- It follows the 45 degrees rule demonstrated in **Figure 2.11b and 2.11c**. In exceptional circumstances, where orientation, topography, landscaping and neighbouring land uses allow, there may be scope for a depth beyond 45 degrees. The flank wall is designed to **minimise visual intrusion where visible from neighbouring properties**.

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Figure 2.11b: Depth of projection no greater than 45 degrees, as measured from the middle of the window of the closest ground floor habitable room on the rear wall of the main neighbouring property on both sides.

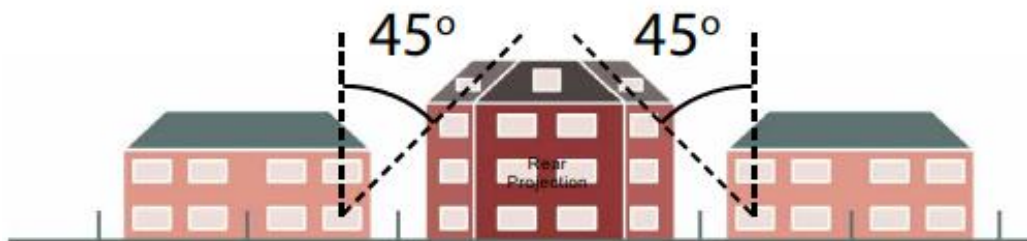


Figure 2.11c: Height of projection beyond the rear of neighbouring properties is no greater than 45 degrees as measured from the middle of the window of the closest ground floor habitable room on the rear wall of the main neighbouring property on both sides.

Objection #4:

- a) The proposed development does NOT provide any illustrations which can be used to determine the relationships with adjacent properties in order to ascertain compliance or otherwise to the important Figures 2.11 b) & 2.11 c) of SPD2 Chapter 2 - 45° Degree rules both Horizontally and Vertically.

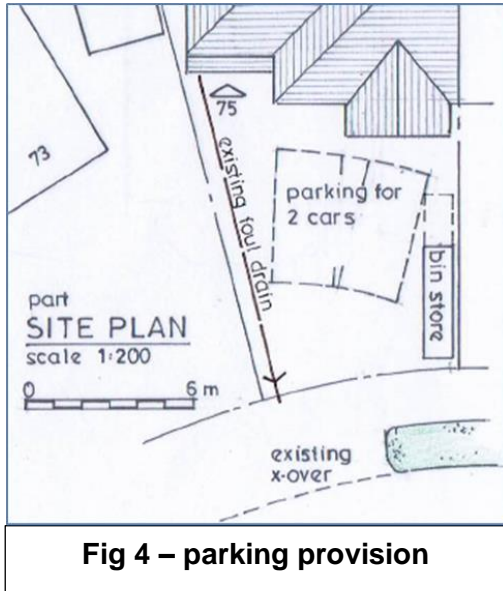
CAR PARKING PROVISION

The car parking provision are two Off-Street parking bays.

Objection #5:

- The parking bays do NOT allow space for exiting in a forward gear if parked in a forward gear. There is no turning head provided to exit and the parked vehicle once parked in a forward gear would need to reverse out over the footpath and into Shirley Avenue at a dangerous corner and via an Unaligned Cross-Over.
- Any overspill parking would need to be on Shirley Avenue and at a dangerous bend (about 55°), narrowing the road width for other road users.

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- Assuming 9 adult occupants of the proposed development all of whom possibly own a vehicle (car or van) would mean 7 vehicle overspills onto the local road network for overnight parking at a PTAL 2 location;
- Inadequate parking for the number of occupants at PTAL 2;
- The existing cross-over does not align well with the driveway, it is off-set by the grass verge;
- Sight lines are not provided;
- There is no legislation to prevent car or van ownership for personal/business purposes.

In summary:

The foregoing reasons given, provide ample evidence to refuse this development proposal on grounds of character, failure to define Minimum Space Standards, failure to provide evidence on building lines and the 45° rule (both vertical & horizontal) or the Private Amenity Areas for Units 1, 2 & 3 also No Private Amenity for Units 4 & 5 and inadequate and insufficient parking provision for the number of occupants at a Suburban Setting at PTAL 2 location with possibly 7 vehicle overspills onto the local road network for overnight parking at a Dangerous Bend.

We therefore recommend that this proposed development is refused.

Please list our objection on the on-line public register as Monks Orchard Residents' Association (objects).

Please inform us of your recommendation in due course.

Kind Regards

Derek Ritson

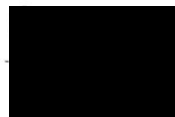


Email: planning@mo-ra.co

Derek C. Ritson I. Eng. M.I.E.T.

MORA Executive Committee - Planning

Sony Nair



Chairman,

Monks Orchard Residents' Association.

Email: chairman@mo-ra.co



Cc:

Sarah Jones MP

Croydon Central

Nicola Townsend

Head of Development Management

Cllr. Sue Bennett

Shirley North Ward Councillor

Cllr. Richard Chatterjee

Shirley North Ward Councillor

Cllr. Gareth Streeter

Shirley North Ward Councillor

Bcc:

MORA Executive Committee

Affected Local Residents

Interested Parties