

To: Case Officer – Ms Yvette Ralston  
Development Environment  
Development Management  
Building Control  
6th Floor  
Bernard Weatherill House  
8 Mint Walk  
Croydon  
CR0 1EA

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

28<sup>th</sup> January 2021

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Dear Ms Ralston

Please accept this letter as a formal objection to Application **Ref: 21/00108/FUL** for Demolition of the existing dwelling and the erection of a 4-storey building comprising **9 flats** with associated landscaping and amenity space, and the relocation of a vehicular crossover at **81 The Glade** Croydon, CR0 7QN.

The **Monks Orchard Residents' Association** is registered with the **Croydon LPA** and represents approximately **3,800** households in the **Shirley North Ward**. We only object on grounds of 'non-compliance' to adopted or 'emerging' Planning Policies' or to clarify 'ambiguous or vaguely' worded policies that require interpretation appropriate for the individual proposal. The Text with Green Background are the current adopted or emerging Planning Policies relevant to this Application.

Existing		Bedrooms	Bed Spaces (Persons)	Habitable Rooms
Grnd Floor				5
First		3	Not Known	3
Total		3		8
Residential Density			104.58	hr/ha
Housing Density			13.07	units/ha
Typology			Beyond 800m	

**Existing:**

The proposal is for demolition of a family home with **8 habitable Rooms** in a Site Area of **765m<sup>2</sup> (0.0765ha)** with a **Residential Density** of **104.58hr/ha** and a **Housing Density** of **13.07 units/ha**.

### Parameters of proposal:

81 The Glade - Ref 21/00108/FUL																					
21/00108/FUL   Demolition of existing dwelling and erection of a 4 storey building comprising 9 flats with associated landscaping and amenity space, and relocation of vehicular crossover.   81 The Glade Croydon CR0 7QN																					
Site Area	765 sq.m.				Residential Density		379.08 hr/ha				PTAL	2011	1a	0.66	Average HR	3.22		hr/unit			
	0.0765 ha				Housing Density		117.65 u/ha				PTAL	2031	1a	0.66							
	Floor	Bedrooms	Bed Spaces (Persons)	Habitable Rooms	GIA	GIA LP	Built-In Storage (sq.m.)	Built-In Stotage Required LP	Private Open Space (sq.m.)	Private Open Space Required	Disabled Facilities	Communal Open Space	Play Space for Children	Estimated possible Children	Parking						
Flat 1	Ground	2	4	3	70	70	2.3	2	11	7		88.5	16.5		2	1					
Flat 2	Ground	3	4	4	85	74	2.6	2.5	25.5	7	W/CH										
Flat 3	First	1	2	3	55	50	1.1	1.5	5	5											
Flat 4	First	2	3	3	62.8	61	1.5	2	8	6											
Flat 5	First	2	3	3	63.3	61	2.3	2	9	6											
Flat 6	Second	3	6	4	96	95	4	2.5	15	9											
Flat 7	Second	3	4	5	76	74	2.6	2.5	8	7											
Flat 8	Third (RS)	1	2	2	51.5	50	2.1	1.5	5	5											
Flat 9	Third (RS)	1	2	2	56.6	50	1.5	1.5	5	5											
Totals		18	30	29	616.2	585	20	18	91.5	57					12	7					

The 'uplift' in Residential Density is therefore  $379.08\text{hr/ha} - 104.58\text{hr/ha} = 274.5\text{hr/ha}$ .

The 'uplift' in **Housing Density** is therefore  $117.65\text{u/ha} - 13.07\text{u/ha} = 104.58\text{u/ha}$ .

The site location is greater than **800m** from any **train station or tram stop** and greater than **800m** from the **Shirley District Centre** as measured on Google Earth.



## 1 Site Location, Layout and Character

The application site is **765m<sup>2</sup>** (0,0765ha) on the corner of **The Glade** and **Lorne Gardens**. The site currently comprises a two storey detached house with pitched roof and an attached garage. It has a paved forecourt at the front which is used for car parking. The topography is relatively flat and there is a large tree in the south east corner of the site in the front garden.

The proposal is for **4 storeys** but has **no passenger lift** to gain access to upper floors. The Glade is a very busy classified feeder road of width **≈7.5m** linking the **A232** to the **A222** with a **367-bus stop** virtually opposite the proposed new drop kerb and access. **Lorne Gardens** is **≈5m** wide residential street. The site has a **Public Transport Accessibility Level (PTAL)** of **1a** which is very poor.



The Local character is predominantly detached and semi-detached houses or bungalows with garages and with associated garden space.

The nearest block of flats is greater than **250m** in radius from **81 The Glade** (as measured on Google Earth) and therefore this proposed development is totally out of character with the surrounding buildings and street-scene.

The proposed development site is over **800m** from any **Train Station** or **Tram Stop** and is **1.2km** (LoS) from the **Shirley District Centre**. The **current typology** of this

location at **81 The Glade**, is assumed to be a '**Large house on a relatively small plot**'.

Therefore, the locality of this proposed development should respect the local character and only support **gradual or gentle densification** as there is **no proposal for improved transport infrastructure** in the foreseeable future.

**The Glade** has a **poor level of Public Transport Accessibility Level (PTAL)** of **1a** provided by a single decker **367 Bus Service** between **Bromley** and **West Croydon** via a winding diverse route at intervals averaging **≈20 minutes**.

The '**Bike Store**' is forward of the Building Line.

## 2 Croydon Plan Review - Windfall and Small Sites <sup>[1]</sup>

The 'Windfall' or 'Small Sites' Evidence Base Croydon Local Plan Partial Review 2019 at para 2.2 states:

2.2 For this study, the expected rate that windfall homes will come forward for development is known as a '**participation rate**'. The participation rate varies based on the capacity and likelihood of a type of housing to come forward. For example, it is much more likely that 'Detached Houses on Relatively Large Plots' will come forward for development than 'Cottages, Terraced Houses and Close-Knit Semi-Detached Houses'. The participation rate is calculated based on the following equation:

**Number of new homes = Participation Rate x (Uplift in Density (u/ha) x Area (ha))**

The equation is used across all **typologies**, broken down by area within and beyond 800m from train stations, tram stops and District Centre's, to calculate the amount (number) of existing dwellings that would be **expected to come forward** as windfall sites during the plan period. **These base figures for uplift in density calculations.**

The **typology** of this location at **81 The Glade**, is assumed to be a '**Large house on a relatively small plot**' and is greater than 800m from a tram/train stop and greater than 800m from the Shirley District Centre.

The Small Sites' Evidence Base Croydon Local Plan Partial Review 2019 publication at **Image 9 & 10** shows the 'Expected Participation Rates for **Options 1 and 2** is: <sup>[1]</sup>

**Typology** for "Large Houses on relatively Small Plots" within 800m to be 2%; 1% beyond 800m for Option 1 and for **Option 2** to be 1% within 800m and 0.5% beyond 800m.

Therefore, by this definition, the '**Expected Number**' of new homes for this application site is given by:

Option 1 Number of new homes = 1.0% x 104.58units/ha x 0.0765ha = **8.0 dwellings**

Option 2 Number of new homes = 0.5% x 104.58units/ha x 0.0765ha = **4.0 dwellings**

It is understood Option 2 is preferred.

### **MORA Comment #1:**

The proposed development therefore '**exceeds**' the "Number of New Homes" for this site at Option 1 by ≈1 dwelling.

The proposed development therefore '**exceeds**' the "Number of New Homes" for this site at the '**Preferred Option 2**' by ≈5 dwellings.

Therefore, based upon the LPA's own evidence, this proposal is an **over development** for this '**typology**' and **suburban setting** locality based upon the '**Small Site Evidence Assessment**' for the Local Plan Review <sup>[1]</sup>. The Residential and Housing Density for this proposal is the '**maximum possible**' crammed into the Site Area only limited by the need to meet the London Plan Policies on **Minimal Internal Accommodation Space Standards**. The reason is assumed to maximise profit, ignoring the local character etc.

A 4-storey (Three Storey with accommodation in the Roof-space) building on a site area of 0.0765ha **significantly** exceeds '**Gradual Intensification**' or '**Limited Growth**' for the area and, for the preferred option, it is nearly double the **Option 2 "Number of dwellings expected"** with Density uplift of 104,58u/ha for this locality which is tantamount to "**Focussed Intensification**" for the available site area.

<sup>[1]</sup> See:

<https://www.croydon.gov.uk/sites/default/files/articles/downloads/%27Windfall%27%20or%20Small%20Sites%20Evidence%20Base%20-%20Croydon%20Local%20Plan%20Issues%20and%20Options%202019.pdf>

### 3 Assessing the Residential and Housing Density in a Suburban Setting location at PTAL 1a.

#### Partial Review of Croydon's Local Plan (2019) <sup>[2]</sup>

- **Focused Intensification Areas (FIA):** Reconsidering the current Intensification Areas and the introduction of additional areas including the following potential options.
  - Omitting the **Shirley FIA** as 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**. The limited development potential significantly reduces the strength of the argument for major transport investment, although improvements are needed from a **sustainability perspective**.

#### **MORA Comment #2:**

Therefore, windfall redevelopments in the **Shirley North Ward** can only be commensurate to **"Limited Future Growth"** assumed **"gradual, moderate incremental densification"** as there is **no planned improvement in supporting infrastructure to support unrestricted 'intensification' i.e., equivalent to "guided" or "Focussed Intensification"**. See Table 6.4

### 4 Croydon Plan 'Growth' Policies for "Intensification"

Table 6.4 Accommodating growth and improving Croydon

Method of accommodating growth and improving Croydon	How it works	Applicable policies
<b>Evolution without significant change of area's character</b>	Each character type has a capacity for growth. Natural evolution is an ongoing process where development occurs in a way that positively responds to the local context and seeks to reinforce and enhance the existing predominant local character. Most development throughout the borough will be of this nature.	DM10.1 – DM10.10
<b>Guided intensification associated with enhancement of area's local character</b>	Areas where the local character cannot be determined as a result of no one character being dominant, further growth can be accommodated through place specific enhancement policies.	DM34 – DM49
<b>Focussed intensification associated with change of area's local character</b>	Further growth 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.	DM10.11
<b>Redevelopment</b>	In larger areas where growth would result in a change to the local character it must be supported by masterplans or design codes.	DM36.2 DM38.1 DM49.1

**a. Regeneration** – The replacement of the **existing buildings** (including the replacement of **detached or semi-detached houses with flats**) with a development that **increases the density and massing**, within the **broad parameters** of the **existing local character** reflected in the **form of buildings and street scene in particular**.

**6.66** To accommodate **growth** which would complement the existing individual character of Places of Croydon and improve efficiency of land use, the Council promotes a minimum **building height of three storeys**.

The 'growth' evolution policies depicted in the Croydon Local Plan are given in Table 6.4 but there is **no guidance** on the appropriate **Residential or Housing Densities** to meet any of the four categories for **'Growth'**.

#### **MORA Comment #3:**

There is no quantifiable definition of Table 6.4 or **"gentle Densification"** or **"Gradual, Moderate Incremental Densification"**. Thus, all these Policies are subjective, vague and inadequately defined for professional assessment. The assessment is at the subjective whim of the case officer. Para 6.66 promotes building height of 3 Storeys whereas this proposed development is 3 storeys plus accommodation in the roof-space.

**[2] See:**

<https://new.croydon.gov.uk/sites/default/files/Planning/Planning%20Interim%20Bulletin%20June%2020%20FINAL.pdf>



#### **MORA Comment #4:**

It can however be logically assumed that “*Gentle Intensification*” or “*Gradual, Moderate Incremental Intensification*” would have appreciably ‘discernible’ reductions of Density than those localities in the ‘*Guided or Focussed*’ ‘Growth’ Intensification categories listed in Table 6.4 - Accommodating Growth (and Improving?) Croydon. If NOT, what is the point of the ‘*Designations*’ listed in Table 6.4?

#### **MORA Comment #5:**

The analysis included in this submission shows the proposal to have excessive ‘*Intensification*’, probably equivalent to “*Focussed Intensification*” and is overwhelming proof the proposal is an overdevelopment for this suburban setting and available Public Transport Accessibility.

The proposal should therefore be refused to allow the applicant to re-apply with a modified proposal of reduced Residential and Housing Densities meeting the required “*Gentle Intensification*” or “*Gradual, Moderate Incremental Intensification*”, objective appropriate for a suburban setting at PTAL of 1a which is forecast to remain at PTAL 1a at least until 2031.

This proposal is NOT ‘*Gradual Gentle Intensification*’ when there is no planned increase in supporting Public Transport infrastructure for sustainable development at this location for the foreseeable future.

## **5 New London Plan Policies**

It is understood that the new ‘**London Plan**’ is currently being considered by the **Secretary of State for Communities & Local Government** <sup>[3]</sup> (21<sup>st</sup> December 2020) for publication and therefore is an emerging policy with significant ‘**weight**’.

### **New London Plan Policy D2 states:**

#### **Policy D2 Infrastructure requirements for sustainable densities.**

A The **density** of development proposals **should**:

- 1) **consider**, and be linked to, **the provision of future planned levels of infrastructure rather than existing levels:**
- 2) be **proportionate** to the site’s connectivity and **accessibility** by walking, cycling, and public transport to jobs and services (including both **PTAL** and access to local services).<sup>26</sup>

B Where there is **currently insufficient capacity of existing infrastructure** to support **proposed densities** (including the impact of **cumulative development**), boroughs should work with applicants and infrastructure providers **to ensure that sufficient capacity will exist at the appropriate time**. This may mean that if the development is contingent on the provision of new infrastructure, including public transport services, it will be appropriate that the development is phased accordingly.

C When a proposed development is acceptable in terms of use, scale and massing, given the surrounding built form, uses and character, but it **exceeds the capacity identified in a site allocation** or the site is not allocated, and the borough considers the **planned infrastructure capacity will be exceeded**, **additional infrastructure proportionate to the development should be delivered through the development**. This will be

[3] See:

[https://www.london.gov.uk/sites/default/files/secretary\\_of\\_state\\_for\\_housing\\_communities\\_and\\_local\\_government\\_21\\_12\\_20.pdf](https://www.london.gov.uk/sites/default/files/secretary_of_state_for_housing_communities_and_local_government_21_12_20.pdf)

identified through an infrastructure assessment during the planning application process, which will have regard to the local infrastructure delivery plan or programme, and the CIL contribution that the development will make. Where additional required infrastructure cannot be delivered, **the scale of the development should be reconsidered to reflect the capacity of current or future planned supporting infrastructure.**

Policy D2 requires that “Where there is currently insufficient capacity of existing infrastructure to support proposed densities (including the impact of cumulative development), boroughs should work with applicants and infrastructure providers to ensure that sufficient capacity will exist at the appropriate time”

#### Minor Developments:

3.2.4 Minor developments will typically have incremental impacts on local infrastructure capacity. The cumulative demands on infrastructure of minor development should be addressed in boroughs 'infrastructure delivery plans or programmes. Therefore, it will **not normally be necessary for minor developments to undertake infrastructure assessments or for boroughs to refuse permission to these schemes on the grounds of infrastructure capacity.**

#### MORA Comment #6:

The interpretation of ‘Minor Developments’ Para 3.2.4 for this application, where there is ‘no probability of improvement to Public Transport Accessibility’ over the Life of the Plan and NO LPA “Infrastructure Delivery Plan” for the Shirley North Ward is that the incremental impacts of minor developments should be mitigated by ensuring a much *gentler densification of gradual, moderate incremental densification* for this locality.

#### MORA Comment #7:

Policy D2 Section A at item 1 gives clear and precise guidance that the provision of future planned levels of infrastructure rather than existing levels, should be considered when arriving at a development proposal’s Density and at item 2 emphasises that the proposals density should be proportionate to the site accessibility to Public Transport.

The proposed development meets neither of these criteria as the public transport currently is very low (PTAL 1a) and there is no prospect of its improvement over the life of the plan supporting the evidence that this proposal is totally unacceptable.

The proposed development does **NOT** meet the requirement of **Policy D2 Para A, B & or C.** The proposal does not consider existing or future planned levels of infrastructure for **minor developments** and as there are **NO ‘infrastructure delivery plans** or programs for the **Shirley North Ward** we can conclude that **cumulative minor developments would require additional supporting infrastructure to be available for sustainable developments** in the Ward. (as defined by para 3.2.4).

In fact, the Local Plan Review (2019) findings and recommendations states:

*“Omitting the Shirley (Focussed Intensification Area) FIA as 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.”*

#### MORA Comments #8:

We challenge the viability of this proposed development as it is **NOT** acceptable in terms of **use, scale and massing** given the surrounding built form as defined in **London Plan Policy D2 para-C** (above).

## 6 London Plan Policy D3 Optimising site capacity through the “Design-Led-Approach”.

**Policy D3 Para 3.3.22 states:**

**3.3.22** To help assess, monitor and compare development proposals several measures of density are **required to be provided by the applicant**. Density measures related to the **residential population will be relevant for infrastructure provision**, while measures of density related to the built form and massing will inform its integration with the surrounding context. The following measurements of **density** should be provided for all planning applications that include new residential units:

- 1) number of units per hectare
- 2) number of habitable rooms per hectare
- 3) number of bedrooms per hectare
- 4) number of bedspaces per hectare.

### **MORA Comment #9:**

The London Plan requires applicants provide these parameters, but then the Policy fails to indicate any ‘methodology’ to assess these required parameters to define the appropriate densities for a development in a given setting or PTAL in relation to the site area.

Policy D3 – the ‘Design-Led-Approach’ does not include these required parameters in its methodology! So why require these parameters to be ‘specified’ if there is no ‘methodology’ provided to actually use them in the methodological determination of Density for the application?

(Note: The ‘Site Area’ is not a requested parameter in Policy D3!)

### **Policy D3 of the draft London Plan.**

The Secretary of State has **added three new clauses** to the policy that say:

- a. “The design of the development **must optimise site capacity**. Optimising site capacity means ensuring that development takes the most appropriate form for the site. **Higher density developments** should be promoted in areas that are **well connected to jobs, services, infrastructure** and amenities by **public transport**, walking and cycling.
- b. Where there are existing clusters of high-density buildings, expansion of the clusters should be positively considered by Boroughs. This could also include expanding Opportunity Area boundaries where appropriate.
- c. **Gentle densification** should be actively encouraged by Boroughs in **low-and mid-density locations** to achieve a change in densities in the **most appropriate way**. This should be interpreted in the context of **Policy H2.**”

### **MORA Comment #10:**

These new clauses by the Secretary of State supports our evaluation to optimise site capacity as the application site is NOT well connected to service infrastructure and the proposal should engage an appropriate **“Gentle Densification”** (*undefined*) for the proposed locality at 81 The Glade.

The proposed Densities are **much too** high and do not meet the ‘*obvious*’ interpretation objective of **“Gentle Densification”** or **“gradual, moderate incremental densification”** (*also undefined*).

**MORA Comment #11:**

The **Croydon LPA** has **NO** published '**Infrastructure Delivery Plan**' or program for the **Shirley North Ward** to improve **Bus** or **Tram Public Transport Infrastructure** for the residents of **Shirley North Ward** over the life of the plan. In fact, **Shirley** is **not even mentioned** in any of the 143-pages of the '**Infrastructure Delivery Report**'. <sup>[4]</sup>

We have had **NO** improvement in **local infrastructure** to support any of the **year-on-year cumulative developments** and **NO** visible **Community Infrastructure Levy (CIL)** contribution has been spent in our area. We have **NO knowledge** of an '**Infrastructure Delivery Program**' for our area and **NO** proposed improvement to **Public Transport Accessibility**.

**MORA Comments #12:**

The proposed development could **NOT** be considered of '**limited**' growth "**within the broad parameters of the existing local character reflected in the form of surrounding buildings and street scene**" or, for the **site area** and local character assessment as required by the vague and subjective **Policies D2 & D3 'Design-Led-Approach'** of the **New London Plan**.

Therefore, we would seriously suggest that this development proposal's **Residential and Housing Density** is **significantly too high and inappropriate for the locality** and if the case officer is minded to recommend approval of this application in defiance of this '**overwhelming foregoing evidence**', we would expect a **stated justification** of how this assessment is **derived** and that a **significant Community Infrastructure Levy (CIL)** contribution from the **developer** is required in order to **fund** actual '**significant improvements**' to local **Public Transport Accessibility** for this high level of **Residential Density** for an appropriate and actual recognisable improvement in **public transport accessibility** in **The Glade**, as required by the **Policy**.

#### 4 **TfL guidance on Densities appropriate for suburban settings at various PTAL's**

As the **New London Plan** has now reached the stage of "**significant Weight**" and the replacement of the **Density Matrix** with a **vague and subjective definition policy of a "Design-Led-Approach"** which would be extremely difficult to enforce, due its subjectivity, we therefore need to resort to other methods of assessment.

Using the guidance detailed in the TfL publication '**Connectivity Assessment Guide**': <sup>[5]</sup>

TfL recommends **Residential Density** for a **Suburban Setting** at **PTAL 1a** in the range **0 to 1** should be within the range **150 to 200hr/ha** for an appropriate accessibility to **Public Transport**, whereas this proposed development has a **Residential Density** of **379.08hr/ha**.

TfL recommends **Housing Density** for a **Suburban Setting** at **PTAL 1a** in the range **0 to 1** at an average of **3.22hr/unit** should be within the range **40 to 65units/ha** for an appropriate accessibility to public transport, whereas this proposed development has a **Housing Density** of **117.65units/ha**.

Assuming the incremental increases over the ranges of '**Density**' and '**PTAL**' as recommended by the TfL '**connectivity assessment guide**,' are "**Linear**".

[4] See: <https://new.croydon.gov.uk/planning-and-regeneration/planning/planning-evidence-and-information/local-plan-evidence-topic/infrastructure-delivery-plan>

[5] See: <http://content.tfl.gov.uk/connectivity-assessment-guide.pdf>



Then the **density**  $y$  is given by the straight-line graph, over the linear ranges according to:

$$y = mx + c \text{ where } y = \text{density}; m = \text{slope} = \frac{\Delta y}{\Delta x}; x = \text{PTAL and } c = y \text{ when } x = 0.$$

A **Suburban Setting** with **Residential Density** of **379.08hr/ha** would require an incremental increase in **PTAL**. To calculate this value of **PTAL**:

$$\text{Thus, } y = 379.08 = \left(\frac{\Delta y}{\Delta x}\right) * x + c \text{ using TfL guidance: Therefore } m = \left(\frac{350-200}{6-4}\right) = m = 75$$

' $c$ ' is found by max and min 'simultaneous equations':

$$y = 350 = 75 * 6 + c \text{ and } y = 200 = 75 * 4 + c \text{ added becomes } 550 = 450 + 300 + 2c$$

$$\text{Therefore: } 550 = 750 + 2c \text{ \& } -200 = 2c \text{ thus } c = -100$$

The required value of supporting **PTAL** at the proposed **Residential Density of 379.08 hr/ha** is:

$$379.08 = 75x + (-100) \text{ thus } 379.08 + 100 = 75x \text{ therefore } x = \text{PTAL} = 6.39$$

Similarly, for assessing **Housing Density** using the same analysis.

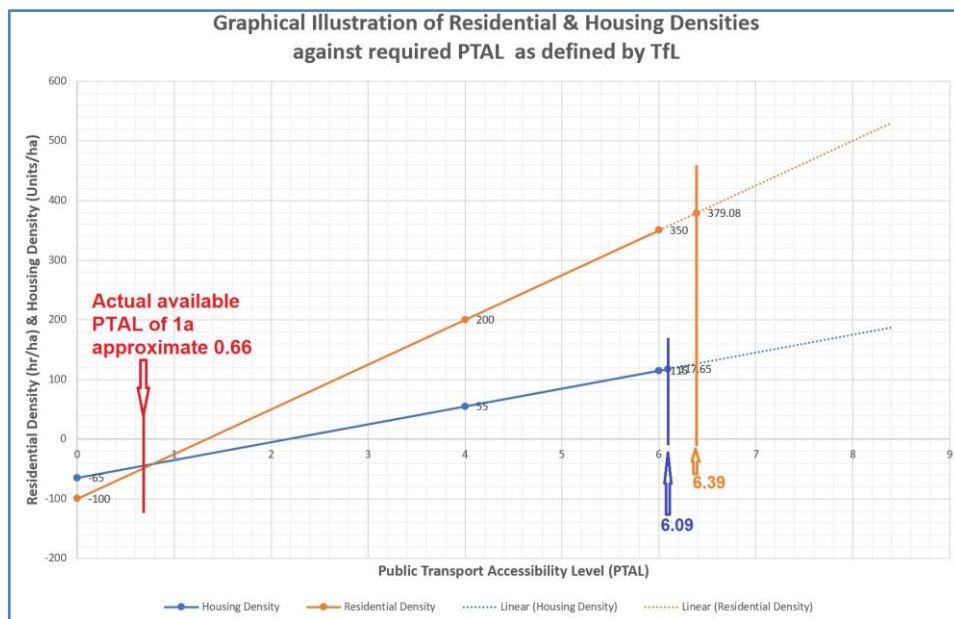
$$\text{Thus } y = mx + c \text{ then } 117.65 = \left(\frac{115-55}{6-4}\right) x + c \text{ therefore } m = \left(\frac{115-55}{6-4}\right) = 30 = m$$

$$\text{To find } c : 115 = 30 * 6 + c \text{ and } 55 = 30 * 4 + c \text{ added gives } 170 = 180 + 120 + 2c$$

$$\text{thus, } 170 - 300 = 2c \text{ } -130 = 2c \text{ therefore } c = -65$$

The required value of supporting **PTAL** at the proposed **Housing Density of 117.65 units/ha** is:

$$117.65 = 30x + (-65) \text{ thus } 182.60965 = 30x \text{ and } x = \text{PTAL} = 6.09$$



The above provides a Graphical illustration of the required PTAL Calculations for Residential and Housing Densities based upon the TfL WebCAT guidance. [6]

[6] See: <http://content.tfl.gov.uk/connectivity-assessment-guide.pdf>

PTAL	Access Index range	Map colour
0 (worst)	0	
1a	0.01 – 2.50	
1b	2.51 – 5.0	
2	5.01 – 10.0	
3	10.01 – 15.0	
4	15.01 – 20.0	
5	20.01 – 25.0	
6a	25.01 – 40.0	
6b (best)	40.01 +	

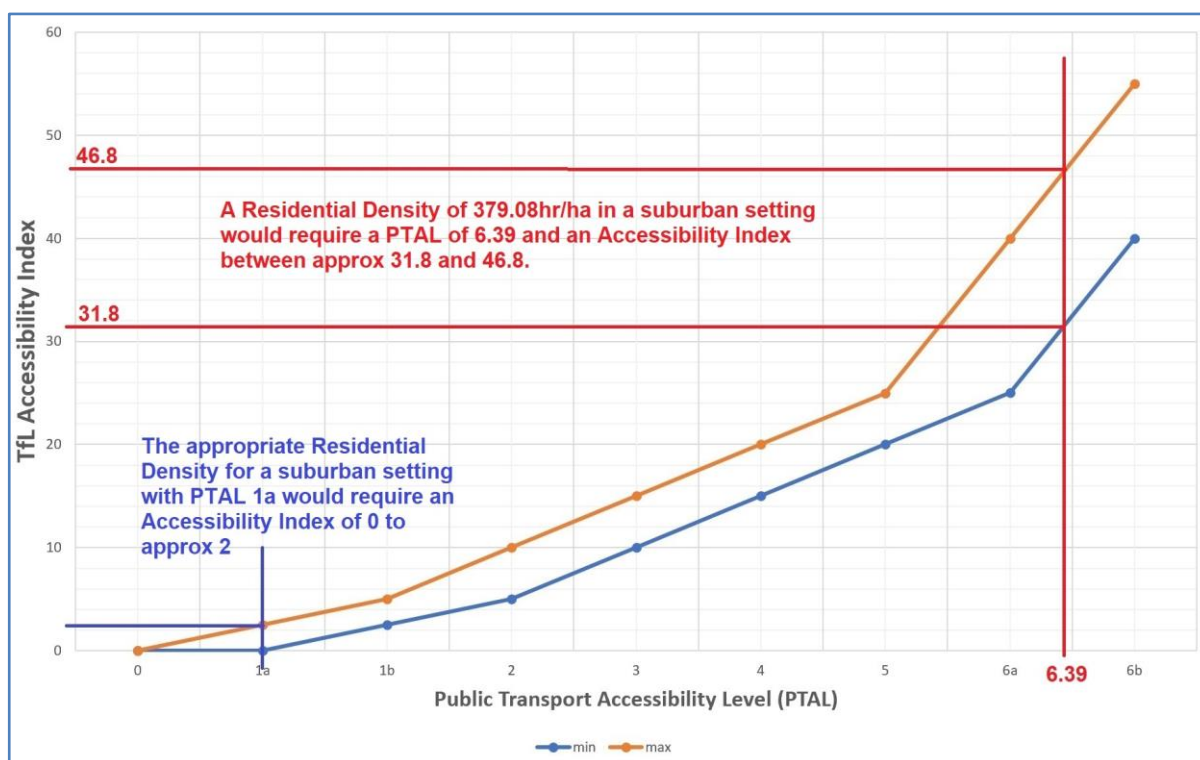
Table 2.2: Conversion of the Access Index to PTAL

The above Table provides the TfL Conversion of PTAL and their corresponding 'Access Index Ranges' for calculating Public 'Transport Accessibility Level' (PTAL).

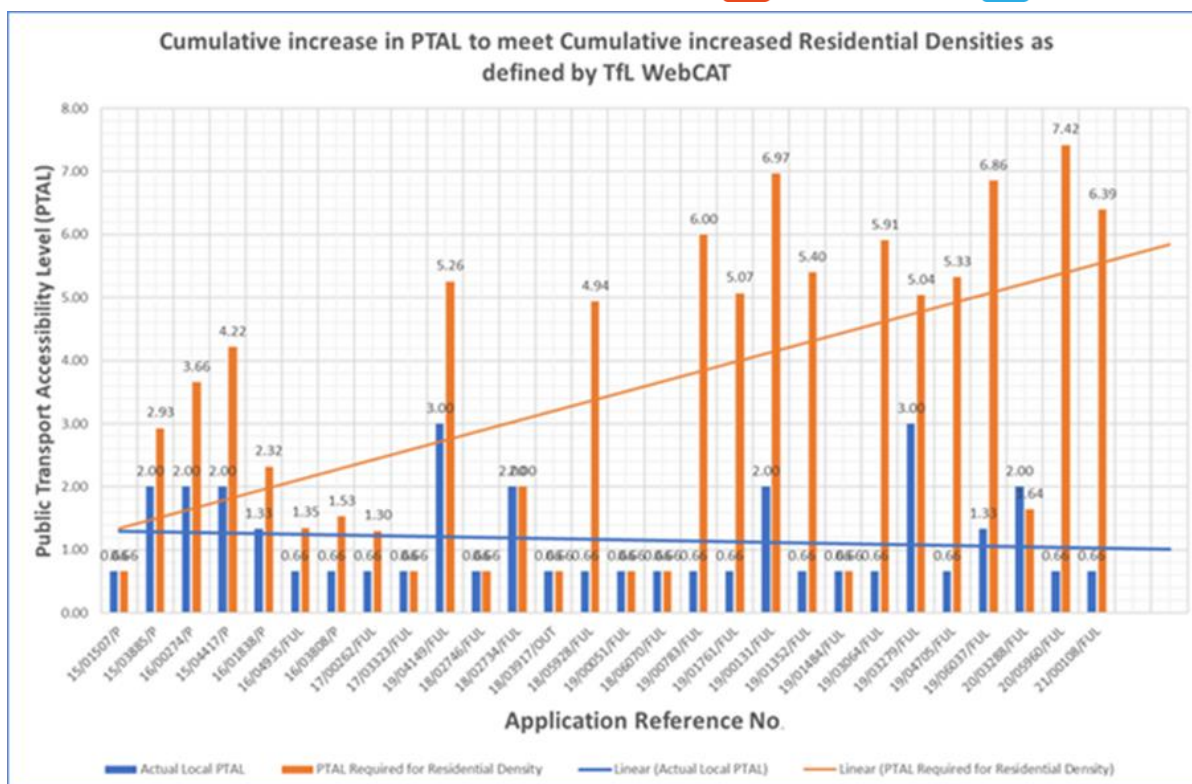
#### **MORA Comment #13:**

In the absence of Policies and methodologies to define appropriate Densities for Development Proposals in a Suburban Setting at low PTAL's, the above assessment is offered for consideration.

It is requested that the Case Officer's Report fully justifies any reasons to dispute our analysis and provides detailed evidence or justification to substantiate any alternative methodologies of assessment.



The Illustration above shows the graphical representation of The Transport for London (TfL) Accessibility Index comparisons for the proposed development at the location actually served by PTAL 1a but which would require a PTAL of 6.39 with TfL Accessibility Index required between  $\approx 31.8$  to  $\approx 46.8$  inappropriate for the area.



The above histogram gives an indication of Cumulative **over developments** and **unsustainable Public Transport Accessibility (PTAL)** resultant on recent '**cumulative**' piecemeal in-fill and windfall site redevelopments in the MORA Post Code Area [7] of the Shirley North Ward.

## 7 SPD2 Chapter 2 Suburban Residential Developments

### 2.6 Connectivity & Character

2.6.1 The growth of the suburban population means an increased demand on public transport services, providing an opportunity to deliver better public services, including transport.

2.6.2 Whilst intensification may come forward gradually over time, there is the clear need for a holistic, forward-looking approach to infrastructure and supporting services. Croydon Council is committed to working with TfL and other service providers to ensure suburban growth is delivered in conjunction with adequate access to active and public transport facilities.

2.7.2 Each of Croydon's 16 Places has a distinct character. Applicants should consider the area they are working in and for more detail on the character of the place refer to the Borough Character Appraisal<sup>20</sup>. Some areas within Croydon are defined by the predominance of certain types of homes; the physical characteristics that help to define different types of housing are detailed in the Borough's Character Typology document<sup>21</sup>. Physical constraints that can inform the character of an area include, but are not limited to:

- The layout of streets and the relationship of built form to the street and other buildings;

[7] See: <https://i1.wp.com/www.mo-ra.co/wp-content/uploads/2020/03/MORA-Map-2020-DensityMatrix-Mar20.jpg>

- The predominance and/or design of landscaping along the street and within plots, including hard-standing;
- The layout of plots and how this informs the street-scene, including boundaries and entrances;
- The form of building footprints and the shape of roofs;
- Materials used on buildings, boundaries and hard-standing;
- Size, style and positioning of windows, architectural details & features.

2.8.3 Schemes should closely relate to the existing surrounding typologies by pursuing a similar density, massing, style, materials and detailing. Proposals which adopt this approach and create poor-quality copies of the characteristic architecture of an area will not be acceptable. It can be challenging to be sympathetic and faithful where a proposal departs from the predominant density or scale of buildings in the area.

**MORA Comment #14:**

**SPD2 paras 2.6.1 & 2.6.2 recognises increased demand on Public Transport but it is also recognised that this will NOT be forthcoming over the life of the Plan. This will result in occupants making more use of car journeys than otherwise and is detrimental to the Policies of reducing car usage and effects on climate change.**

**MORA Comment #15:**

**The proposal does NOT reflect the character of the area with regard to Massing or Density, and does NOT reflect the Borough Character Appraisal for the “Shirley Place”.**

**MORA Comment #16:**

**The proposal does NOT closely relate to the existing surrounding typologies by pursuing a similar density, massing, style, materials and detailing and is therefore not acceptable.**

## 8 Massing - Relationship Between Buildings (SPD2)

### ACCESS TO DAYLIGHT & SUNLIGHT

2.9.1 When considering the relationship with other built form, whether proposed or existing, applicants should ensure adequate daylight and sunlight that is appropriate for future residents, and that **there is not unreasonable loss of light for neighbours**.

2.9.2 Applicants are **advised** to consult the BRE guidance<sup>22</sup> on access to daylight & sunlight, however where this guidance would inhibit the efficient use of a site, there may be flexibility in the application of these standards. This will only be applicable to constrained sites and may not be used to justify substandard design of proposals. Flexibility in the application of BRE standards will only be acceptable where a proposal has a compelling design that mitigates daylight and sunlight issues.

2.9.3 Where there is concern that the **orientation of the proposal and proximity to neighbouring buildings will limit access to natural light** within the proposed and/or neighbouring dwellings, **proposals will be required to provide a daylight and sunlight analysis study**<sup>23</sup>. Such studies will not normally be required where a neighbour's window directly faces onto or over an application site in a manner that is considered to be un-neighbourly.

2.9.9 Where there is a concern that a **development would appear overbearing** to a neighbouring property and/or create a poorly designed street scene, **they will not be supported**.



#### **MORA Comment #17:**

There is **No Daylight Study Report** to investigate overbearing nature of the proposal on the adjacent property at 83 The Glade and there is no surface water drainage proposal or report on surface water SuDS management.

#### **MORA Comment #18:**

The height of three storeys, plus accommodation in the roof-space (4-Storeys), of the proposed development will, by its positioning, significantly shield and cast a shadow over the southern aspect and most of the garden of 83 The Glade.

This is another reason to refuse the proposal for re-application for either a reduced height development or modified footprint to minimise overbearing and shading of the proposed development toward 83 The Glade.

#### **MORA COMMENT #19:**

The proposed development would undoubtedly appear overbearing to the neighbouring property at 83 The Glade and therefore should not be supported.

## **9 Heights & Depths Projecting Beyond Rear Building Lines (SPD2)**

**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 Building Lines & Boundaries (Refer to 2.16) and Daylight and Sunlight (Refer to 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.

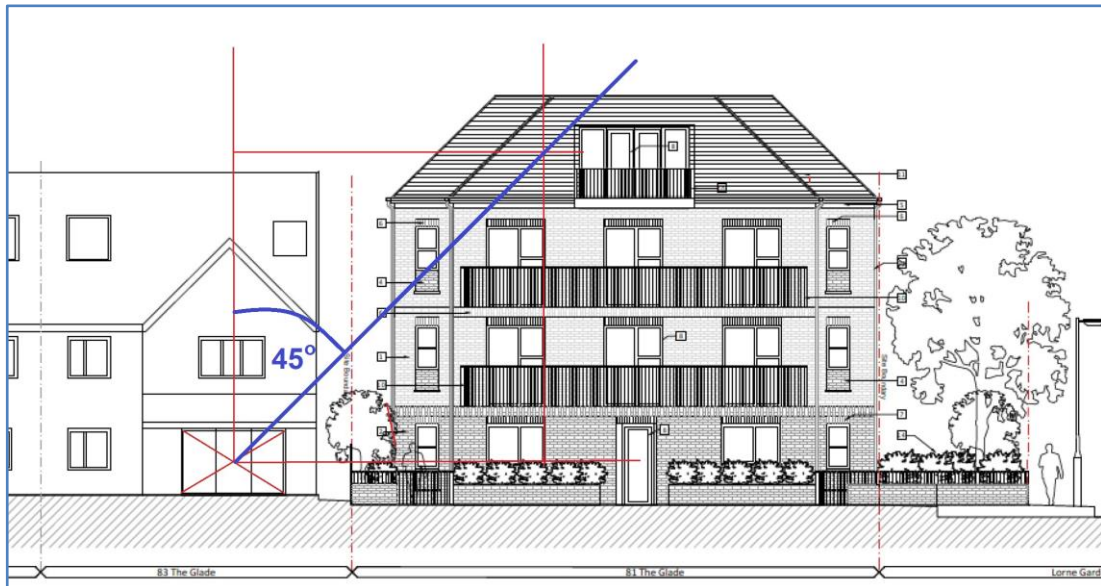
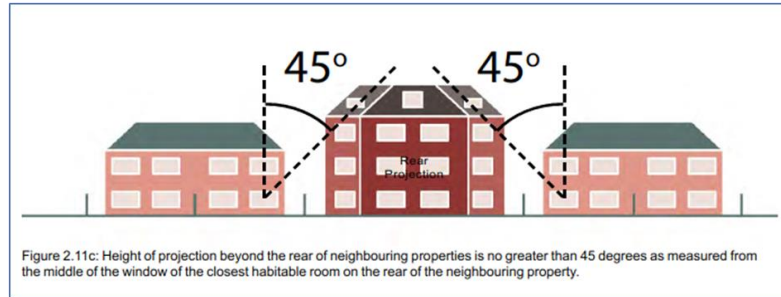
**2.11.2** Applicants should **also** refer to the guidance on **Daylight and Sunlight** (Refer to 2.9 for guidance), where there would be **unreasonable impact on neighbouring access to natural light**, the depth of a projection beyond the rear building line **should be reduced**. The design of a flank wall visible from neighbouring properties should be carefully designed to minimise visual intrusion.

**2.16.2** Developments that seek to build closer to the boundary of neighbouring plots must demonstrate consideration to the impact on neighbouring **amenity** as well as the rhythm of development along the street.

**2.16.3** Separation distances, where there are no habitable rooms on the side elevations of the neighbouring or proposed development, should be no smaller than 1m, to allow for access to the rear of a property. Where existing development is built closer to the boundary, a proposal may seek to build to the same line as the existing.

#### **MORA Comment #20:**

There is **NO Daylight & Sunlight Survey Report** to establish the effect of the proposed development on **83 The Glade**.



#### MORA Comment #21:

The above illustration shows the Rear East Facing Elevation of the proposed development and the adjacent property at 83 The Glade showing overbearing and unreasonable impact on neighbours' amenity and the failure of the development to meet the 45° (vertical) Policy defined in SPD2 Section 2.11 and image 2.11c.

#### MORA Comment #22:

There are NO 'exceptional circumstances' where the orientation, topography, landscaping and neighbouring land uses allow the disregard of the 45° rule (vertical) projection from the adjacent property at 83 The Glade, centre of rear ground floor habitable room window, projection on a 45° line toward and intersecting the proposed development of three storeys plus accommodation in the roof-space, which is significantly detrimental to the amenity afforded to number 83 The Glade. This is a failure to meet the approved and adopted planning policies.



### **MORA Comment #23:**

SPD2 recommends that in areas of **semi-detached homes** in a planned estate, that **proposals should not exceed 3 storeys**, and that the 3rd storey should be partially concealed within the roof form which, for **gentle densification**, would be considered a maximum and more appropriate for this location.

## **10 London Plan Policy S4 Play and informal recreation.**

5.4.5 Formal play provision should normally be made **on-site** and provide **at least 10 square metres per child** to address **child occupancy** and play space requirements generated by a development proposal. Supplementary Planning Guidance will provide additional detail on the application of this benchmark and other implementation issues. Where development is to be phased, there should be an early implementation of play space.

### **Croydon Plan**

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

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.

### **MORA Comment #24:**

The estimated number of children of occupants of the development could be a maximum of **12** which would require a play space allocation of **120m<sup>2</sup>**, to comply with London Plan **Policy S4**, a deficiency of  $16.5\text{m}^2 - 120\text{m}^2 = 103.5\text{m}^2$ .

This **Proposed Development** does **NOT** comply with **Policy DM10.4 d)** and should be refused.

## **11 London Plan Residential Parking.**

### **Policy T6.1 Residential parking**

- A** New residential development should not exceed the maximum parking standards set out in Table 10.3. These standards are a hierarchy with the more restrictive standard applying when a site falls into more than one category.
- B** Parking spaces within communal car parking facilities (including basements) should be leased rather than sold.
- C** All residential car parking spaces must provide infrastructure for electric or Ultra-Low Emission vehicles. At least 20 per cent of spaces should have active charging facilities, with passive provision for all remaining spaces.
- G** Disabled persons parking should be provided for new residential developments. Residential development proposals delivering ten or more units must, as a minimum:
  - 1) ensure that for three per cent of dwellings, at least one designated disabled persons parking bay per dwelling is available from the outset;

- 2) demonstrate as part of the Parking Design and Management Plan, how an additional seven per cent of dwellings could be provided with one designated disabled persons parking space per dwelling in future upon request as soon as existing provision is insufficient. This should be secured at the planning stage.

**H All disabled persons parking bays associated with residential development must:**

- 1) be for residents' use only (whether M4(2) or M4(3) dwellings)
- 2) not be allocated to specific dwellings, unless provided within the curtilage of the dwelling
- 3) be funded by the payment of a commuted sum by the applicant, if provided on-street (this includes a requirement to fund provision of electric vehicle charging infrastructure)
- 4) count towards the maximum parking provision for the development
- 5) be designed in accordance with the design guidance in BS8300 vol.1
- 6) be located to minimise the distance between disabled persons parking bays and the dwelling or the relevant block entrance or lift core, and the route should be preferably level or where this is not possible, should be gently sloping (1:60-1:20) on a suitable firm ground surface

### The London Plan (Residential Parking)

Table 10.3 -Maximum residential parking standards:

Location	Number of Beds	Maximum parking provision
Outer London PTAL 0-1	1 to 2	Upto1.5 space per dwelling
Outer London PTAL 0-1	3+	Upto1.5 space per dwelling^

Thus, for this proposed Development of 9 dwellings and 30 occupants the maximum parking provision should be  $9 \times 1.5 = 13.5$  rounded to 14.

#### MORA Comment #25:

For this proposed development the number of bays, including disabled bay, = 7 (which is an availability of 0.233 per person), so the proposal is deficient by 6.5 bays, rounded  $\equiv$  7 bays (which is  $\approx$ 50% below the Policy allocation).

There is no legislation to prevent car ownership or light van ownership for residents with commercial undertakings so any overspill car or van ownership will need to be parked locally over-night, on-street, which is likely to be in Lorne Gardens' access road.

#### MORA Comment #26:

There is no mention of any electric charging points or provision of infrastructure for electric or Ultra-Low Emission vehicles.  $20\% \text{ of } 7 = 1.4$  rounded = 2 should at least be equipped with such infrastructure.

#### MORA Comment #27:

There are no swept path illustrations to ensure vehicles can enter any parking Bay, with minimum manoeuvres, when all other Bays are full and exit in a forward gear onto The Glade, also when all other bays are full again with minimum manoeuvres.



## 12 Housing Targets

One of the reasons for approving suspect development proposals is the stated “*compelling need for more homes*” for which The London Plan and the Croydon Plan and the Croydon Plan Review have published ‘*housing targets*’ for the Places of Croydon to meet this “need”. The London plan’s proposed 10-year windfall and redevelopment targets for Croydon is given in Policy H2 Small sites at Table 4.2 - 10-year targets (2019/20 -2028/29). Net housing completions on small sites (below 0.25 hectares) in size and for Croydon is stated to be 6,410 – which equates to 641 dwellings per year for the ‘whole of Croydon’ over the period 2019/20 to 2028/29.

### Croydon Plan Review (2019):

The Targets for new dwellings over the period **2019 to 2039** are set out in **The Strategic Forecast** for the **Croydon Local Plan Review (2019-2039)** which gives the target for the **whole** of the ‘**Shirley Place**’ at between **360 to 460 units** spread over the **20 years of the plan**, giving yearly targets of **18 to 23 units year-on-year** which is an average of **20.5 dwellings per year** for the life of the plan. This can be seen in the LPA’s published (2019) **Croydon Local Plan Review – Issues and Options**, at page 15, “where it clearly states “**Homes by Place (2019-2039)**”; including the ‘**Shirley Place**’ (which includes both **Shirley North and Shirley South Wards**). i.e., target Broken down by “**Place**”.

Croydon Plan Review 2019 - 2039 (at 2019)	
Homes by Pace (2019 2039)	
Place	Total
Addington	280 to 350
Addiscombe	1,480 to 1,880
Broad Green & Selhurst	880 to 1,070
Coulsdon	2,050 to 2,490
Central Croydon	11,540 to 12,980
Crystal Palace & Upper Norwood	480 to 670
Kenley and Old Coulsdon	2,000 to 2,480
Norbury	540 to 670
Purley	7,260 to 9,390
Purley Way transformation area	2,900 to 4,470
Sanderstead	1,670 to 2,070
Selsdon	870 to 1,070
Shirley	360 to 460
South Croydon	890 to 1,070
South Norwood & Woodside	560 to 620
Thornton Heath	1,450 to 1,880
Waddon	500 to 610
Already under construction	5,370
Borough totals	At least 46,040 new homes across the borough

The **MORA Post Code** area application approvals for **2019** as shown in the table below have provided an additional **48 dwellings** which is over double the yearly quota for the **whole** of the ‘**Shirley Place**’ at an average of **20.5 dwellings per year**.

The **Monks Orchard Residents’ Association (MORA)** monitors only our **MORA Post Code Area** for planning applications which is only a part of the Shirley North Ward, <sup>[8]</sup> (after the Ward boundary changes) so the **MORA** area is only a **very small portion** of the ‘**Shirley Place**’ as defined by the **Croydon Local Plan**, yet has contributed over **double the target** for the whole **Shirley “Place”**.

The **cumulative** average estimated over the two years is  $(48 + 22)/2 = 35$  per year which is for just the **MORA post code area**.

This clearly shows cumulative **dwellings significantly exceed the strategic target** defined in the **Local Plan Review** of **20.5 dwellings average per year**.

[<sup>8</sup>] See: <http://www.mo-ra.co/planning/planning-matrix/>

The **MORA Post Code Area** applications approvals and waiting approval for **2019** and **2020** dwellings are as shown in the tables below.

Location	Reference No.	Approval Date	Existing Dwellings	New Dwellings	Overall Increase
20-22 The Glade	18/05928/FUL	01/02/19	0	2	2
10-12 Woodmere Close	19/00051/FUL	27/02/19	0	1	1
9a Orchard Rise	18/06070/FUL	21/03/19	1	9	8
32 Woodmere Avenue	19/00783/FUL	20/06/19	1	7	6
18a Fairhaven Avenue	19/01761/FUL	20/06/19	1	9	8
17 Orchard Avenue	19/00131/FUL	06/11/19	1	8	7
56 Woodmere Avenue	19/01352/FUL	24/10/19	1	9	8
14-16 Woodmere Close	19/01484/FUL	23/10/19	0	1	1
37 Woodmere Avenue	19/03064/FUL	26/09/19	1	8	7
<b>Totals</b>			<b>6</b>	<b>54</b>	<b>48</b>

Location	Reference No.	Approval Date	Existing Dwellings	New Dwellings	Overall Increase
151 Wickham Road	19/04149/FUL	18/03/20	0	5	5
16-18 Ash Tree Close	19/04705/FUL	27/02/20	2	8	6
195 Shirley Road	19/06037/FUL	22/09/20	1	9	8
116 Orchard Way	20/05960/FUL	Waiting	1	4	3
			<b>4</b>	<b>26</b>	<b>22</b>

#### **MORA Comment #28:**

The recent **cumulative developments** in the **MORA post code area** (See also histogram above) have **all** contributed to the '**Community Infrastructure Levy**' none of which has been visibly spent in the **MORA area** to improve the **Public Transport Accessibility** to support these increases in local **Residential Densities**.

#### **MORA Comments #29:**

Thus, any statements by the case officer inferring "***an acute need for new homes***" would be considered extremely suspect, giving **inaccurate** and **inappropriate**, guidance to the planning committee members for their determination of the proposal – **as the pressure to meet housing 'need' in the MORA area has been categorically satisfied by over-provision of the strategic targets.** Why have these targets if they are meaningless?

### **13 Summary:**

We have assessed this proposal using as much evidence as available which is appropriate for evaluation.

It is overwhelmingly apparent that this proposal is an overdevelopment for this locality on the many methods of evaluation referenced in our submission, bearing in mind that recent cumulative developments have already placed significant strain on the available supporting infrastructure such that there is now inadequate infrastructure to support this and previous developments and it is recognised that there is no planned improvement in Public Transport Accessibility in the foreseeable future for Shirley North Ward.

Although the proposal meets the minimum space standards it does not provide adequate communal open space for occupants or play space for children of the future occupants of the development. At 4-Storeys we believe the proposal should have a lift.

There have been no Daylight or sunlight studies to ascertain the effects on adjacent properties, especially 83 The Glade and the proposal fails the 45° Degree (vertical) Rule resulting in overbearing and unreasonable impact on neighbours' amenity and the failure of the development to meet the 45° (vertical) Policy defined in SPD2 Section 2.11 and image 2.11c.

We have noted that the Planning Committee emphasise the "compelling need for more homes" for which appropriate targets have been identified. However, on further examination, the pressure to meet housing 'need' in the MORA area has been categorically satisfied by over-provision of the strategic targets. It would therefore be inappropriate to quote this 'need' as a significant reason to approve this application as the identified need has been more than met in the Shirley North Ward to meet the Shirley Place Targets.

We have thus provided in this submission, ample evidence to refuse this proposed development on grounds of non-compliance to planning policies or not meeting the spirit of the planning policies and therefore consider this a totally inappropriate proposal for the locality.

If this proposal is approved, it will make a complete "*mockery*" of all Planning Policies referenced and quoted in this submission.

It is strongly suggested that this proposal is refused such that the applicant can re-submit a proposal which recognises the objectives of the adopted or emerging policies and the spirit of those policies, for a suitable application of appropriate densities within sustainable existing and planned infrastructure and other policy requirements as listed above, for an assessment by Planning Officers and local residents.

Kind regards

Derek



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**Cc:**

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**Cllr. Richard Chatterjee**

**Croydon Central**  
**Head of Development Management**  
**Shirley North Ward**  
**Shirley North Ward**  
**Shirley North Ward**

**Bcc:**

**MORA Executive Committee,**  
**Local Affected Residents**  
**Interested Parties.**