



To:
Ms Shanali Counsell – Case Officer
Development and Environment
6th Floor
Bernard Weatherill House
8 Mint Walk
Croydon
CR0 1EA

From:
Monks Orchard Residents'
Association Planning

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25th June 2021
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Reference:	21/02622/FUL
Application Received	Wed 19 May 2021
Application Validated	Wed 19 May 2021
Address	75 Shirley Avenue Croydon CR0 8SP
Proposal	Conversion of and extension to existing dwelling to provide four self-contained flats.
Case Officer:	Shanali Counsell
Consultation close:	Thu 08 Jul 2021
Determination date:	Wed 14 Jul 2021

Dear Ms Counsell

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 and Residential Extensions & Alterations **must** be **sustainable**^[1] and 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 coloured background is **current adopted** Planning Policies.

1 **Locality**

1.1 The locality of this proposed conversion from a Single-Family Dwelling to an HMO of 4 self-contained Flats is within a TfL assessed **PTAL** of **1b** and is **NOT** within **800m** of a Train/Tram Station or **800m** of a District Centre. Shirley is a **Local Centre** as defined by **Croydon Local Plan Para 11.213**.

1.2 **Shirley Local Centre**
Croydon Local Plan Para 1.213 states:

[1] <https://www.legislation.gov.uk/ukpga/2004/5/section/39>

*“Shirley **Local Centre** consists of the combination of three different character types an ‘Urban Shopping Area’, ‘Scattered Houses on Large Plots’ and a ‘Suburban Shopping Area’. The northern side of the **Local Centre** is more tightly built-up, while the southern more is spacious with green verges, tree lined streets and parking within slip roads. In this area the potential for growth is limited.”*

1.3 Existing:

75 Shirley Avenue									
Existing Semi-Detached			Site Area	1100	sq.m.				
PTAL 2011	1b		Site Area	0.11	ha				
PTAL 2031	1b								
Units	Floor	Bedrooms	Bed Spaces (Estimated)	Habitable Rooms					
1	Ground	1	1	5	Residential Density	72.73	hr/ha		
	First	3	5	3	Residential Density	54.55	bedspaces/ha		
Totals		4	6	8	Housing Density	9.09	units/ha		

1.4 Parameters for this proposal:

New Application										
Ref: 21/02622/FUL			Site Area	1100	sq.m.		Residential Density		109.09	hr/ha
PTAL 2011	1b		Site Area	0.11	ha		Residential Density		109.09	bedspaces/ha
PTAL 2031	1b		Units	4			Housing Density		36.36	units/ha
	Floor	Bedrooms	Bed Spaces	Habitable Rooms	GIA (offered)	Minimum GIA (Required)	Built-In Storage (Offered)	Minimum Built-In Storage (Required)	Open Space Amenity (Offered)	Minimum Open Space Amenity (Required)
Flat 1	Ground	3	4	4	93	74	Not Stated	2.5	Not Stated	7
Flat 2	Ground	1	2	2	51	50	Not Stated	1.5	Not Stated	5
Flat 3	First	2	3	3	61	61	Not Stated	2	Not Stated	6
Flat 4	First	2	3	2	66	61	Not Stated	2	Not Stated	6
	Roof	0	0	1						
Totals		8	12	12	271	246	-	8	-	24

2 Space Standards

2.1 Unit 3 (2b3p) has a Shower Room instead of a bathroom. It is though this is limited by the requirement to meet the **61m²** minimum Gross Internal Area (GIA) requirement for **2b3p** accommodation (London Plan Table 3.1). To provide a bath sized bathroom, apartment 3 would need to remain within the overall **61m²** GIA minimum space standard with minimum room sizes and in-built storage for this apartment and retain the minimum floor space for each room as defined in the London Plan as given at 2.2 below.

2.2 Dwellings must provide at least the gross internal floor area and built-in storage area set out in Table 3.1 and this should be exceeded if possible.

A dwelling with two or more bedspaces must have at least one double (or twin) bedroom that is at least 2.75m wide. Every other additional double (or twin) bedroom must be at least 2.55m wide.

A one bedspace single bedroom must have a floor area of at least 7.5 sq.m. and be at least 2.15m wide.

A two-bedspace double (or twin) bedroom must have a floor area of at least 11.5 sq.m.

Table 3.1 - Minimum internal space Standards for new dwellings

Type of Dwelling		Minimum gross internal floor areas and storage (Square Metres)			
Number of Bedrooms	Number of Bed spaces (persons (p))	1 Storey dwellings	2 Storey dwellings	3 Storey dwellings	Built-in storage
1b	1p	39 (37)*	-	-	1
	2p	50	58	-	1.5
2b	3p	61	70	-	2
	4p	70	79	-	2
3b	4p	74	84	90	2.5
	5p	86	93	99	2.5
	6p	95	102	108	2.5

London Plan Policy Table 3.1 – Minimum Internal Space Standards

- 2.3** The proposed floor plans and **Design & Access Statement** does **NOT** indicate the dimensions of any **‘In-Built’ Storage** to meet the **London Plan Table 3.1** minimum space standards. These **Minimum Standards** are necessary and should be exceeded, if possible, for the benefit of future occupants for the life of the development. Prior to a decision being made, the actual dimensions for any offered **‘In-Built’ Storage** for each Apartment should be specified and checked against the minimum requirement as listed in the London Plan Table 3.1.

3 General Comments on Design & Character

3.1 Refuse & Recycling

- 3.1.1** **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.

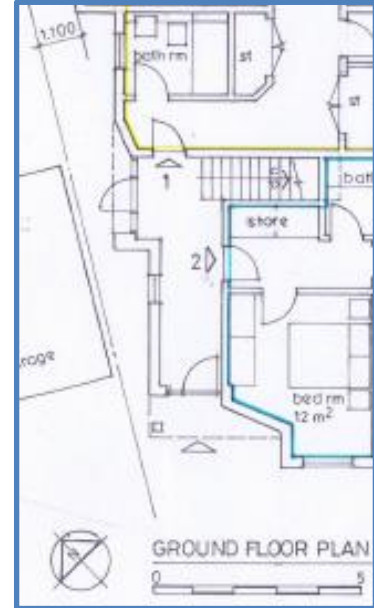
- 3.1.2** The location of the Refuse and Recycling Bins are **NOT** located **“behind the Building Line”** as required by **Policy DM13.1 a)** and therefore is **non-compliant** to **Policy 13.1 a)**. If the **Refuse & Recycling storage** were re-positioned in the rear garden there would be insufficient clearance down the side of the building (≈0.5m width restriction) to pull the refuse bins from the rear garden location to the front of the building on collection days.

3.2 Access to rear garden

3.2.1 The restricted side access would cause significant difficulties to store the cycles from external use into the rear garden cycle storage via the side access to the rear garden without passing through the building interior.

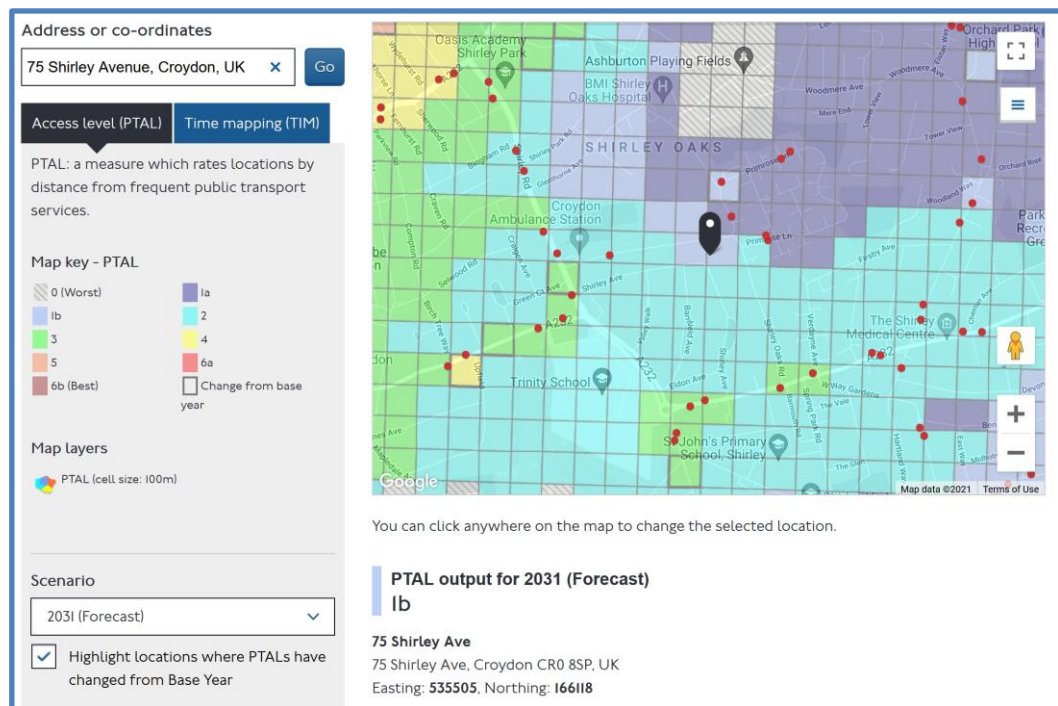
3.2.2 The restricted access width ($\approx 0.5\text{m}$) to the rear garden would also create difficulties for garden maintenance when requiring access for tools and equipment of width greater than 0.5m such as wheelbarrows or garden lawn mowers or rollers for general garden maintenance.

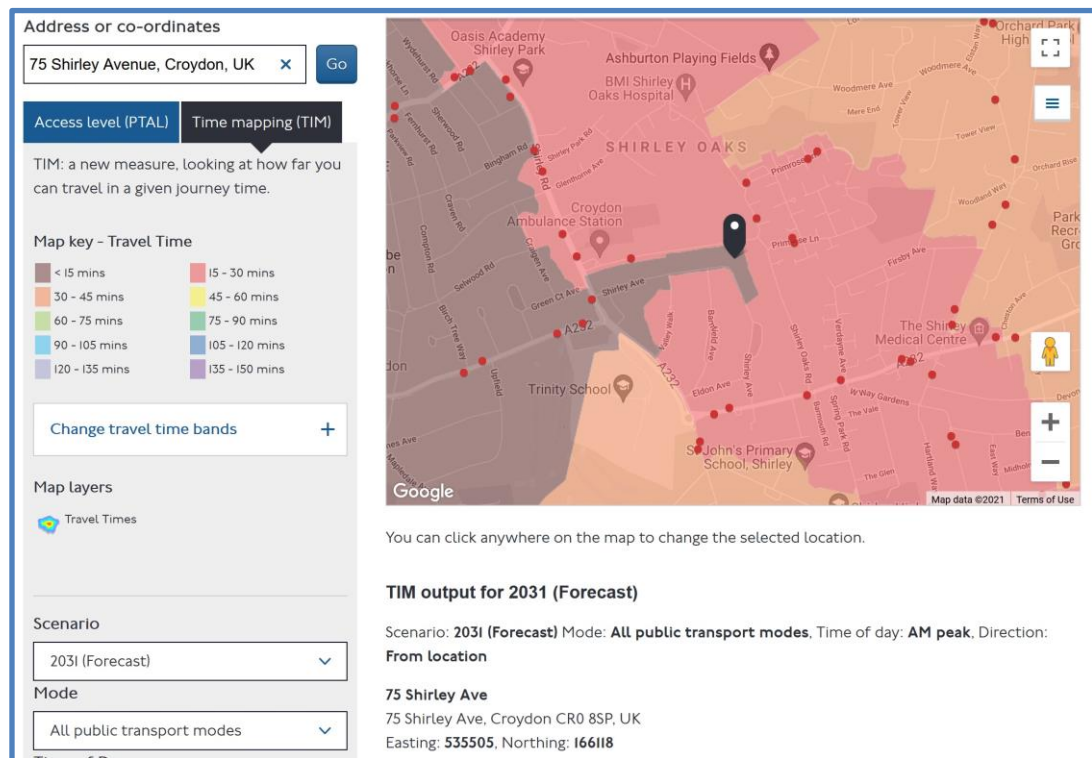
3.2.3 The only accessible route would be via the entrance to the premises by the shared front door into the house and exit via the side entrance via the door adjacent to Apartment 1 and thence into the rear garden via the increased width of 1.1m. The previous arrangement for a single-family dwelling had an outbuilding to store such equipment but this will be demolished such that there is no adequate storage for garden maintenance equipment for the four apartments.



3.3 Public Transport Accessibility:

3.3.1 75 Shirley Avenue has a TfL assessed Public Transport Accessibility Level (PTAL) of 1b and forecast to remain at 1b until at least 2031.





3.3.2 The TfL TIM illustrates Journey Times from identified locations.

4 Incremental Intensification

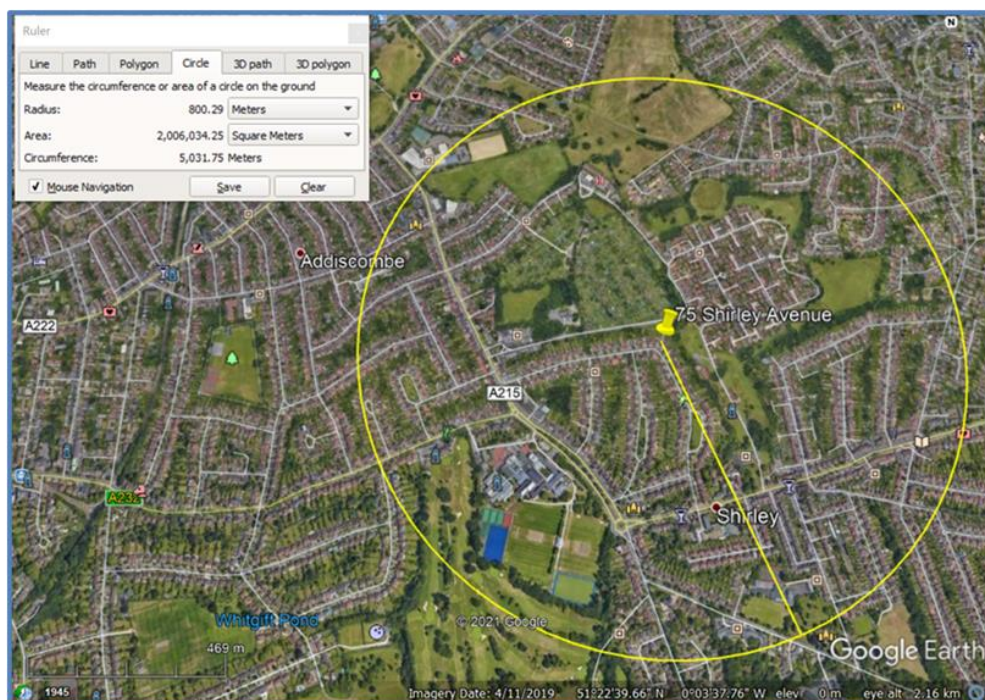


Fig 1 – Google Earth Image showing 75 Shirley Avenue is over 800m from a Train/Tram Station and over 800m from a District Centre.

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4.1 London Plan (2021) Policy H2 – Small Sites; Para 4.2.4:

“Incremental intensification of existing residential areas within PTALs 3-6 or within 800m distance of a station^[2] or town centre boundary^[3] is expected to play an important role in contributing towards the housing targets for small sites set out in Table 4.2.”

- 4.2 The Google Earth image (above) illustrates the development site for this proposed development at **75 Shirley Avenue** which has **Public Transport Accessibility Level (PTAL)** of **1b** and is greater than **800m** radius from any **Train Station** or **Tram Stop** and over **800m** (Line of Sight) from any **District Centre** and therefore the locality is **NOT appropriate** for **“Incremental Intensification”** as defined by the London Plan. The Shirley Shopping Parades are **‘Local’ Centre**, not **‘District’ Centres**.
- 4.3 Although the Croydon Local Plan and the new London Plan **“Growth” Policies** do NOT define the appropriate magnitude of **‘Incremental Intensification’** or **‘Gentle Densification’** it can be logically assumed that these Densities would be demonstrably significantly less than those designations listed in Croydon Plan Policy DM10 Table 6.4.

5 The Croydon Local Plan & The London Plan ‘Growth’ Policies.

- 5.1 The LPA has a **Statutory requirement** to ensure that proposed developments are **Sustainable^[4]** – (Section 39(2) of the Planning and Compulsory Purchase Act 2004) and **NPPF Section 2 - Achieving sustainable development**. In order to comply with this **legal requirement**, a criterion or definition of sustainability and the measurable parameters for assessing sustainability within the proposed development **Site Capacity** are necessary for definition of the **sustainability criterion** in the Local Plan but have been **conveniently omitted** by the Spatial Planning authors of the adopted Local Plan.
- 5.2 **Croydon Local Plan Policy Table 6.4 - Accommodating growth** and improving Croydon? We do NOT agree these Policies **“Improve” Croydon** – rather the opposite.

Table 6.4 Accommodating growth and improving Croydon

Method of accommodating growth and improving Croydon	How it works	Applicable policies
Evolution without significant change of area's character	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
Guided intensification associated with enhancement of area's local character	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
Focussed intensification associated with change of area's local character	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
Redevelopment	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

Table 3 – Croydon Local Plan Policy for **“Growth” at DM10 Table 6.4**

[2] Tube, Rail, DRL or Tram Station.

[3] District, Major, Metropolitan and International Town Centres.

[4] <https://www.legislation.gov.uk/ukpga/2004/5/section/39>

5.3 The Croydon Local Plan 'Growth' Policies in **Table 6.4, DM10.1 to DM10.11 or DM34 to DM49 and DM10 para 6.58 e**, 'purports' to describe regeneration "Growth" by either "Redevelopment" or "Evolution" but gives no definition of the acceptable magnitude of growth in terms of 'Site Capacity', 'Local available and future infrastructure' ^[5] or 'Public Transport Accessibility' ^[6] and therefore the Policy is 'unenforceable' and 'undeliverable' as it has no measurable methodology, is imprecise, indeterminate and devoid of any Policy definition other than guidance to "seek to achieve" a minimum height of 3 storeys at specific locations. The Policy Fails to meet the guidance required in NPPF (2019) Section 3. Plan-making and specifically NPPF Para 16 or Para 35, a) Positively prepared, b) Justified, c) Effective & d) Consistent with National Policy or the Statutory requirement for 'Sustainable Developments'. ^[4] The Croydon Plan Policy provides a *vague objective* that does not consider the limits or allow a substantive determination reflecting the new London Plan Policy 4.2.4 ^[7] (i.e., How areas 'inappropriate' for "Incremental intensification") should be assessed.

5.4 We challenge the case officer to provide justification in the Recommendation Report how this development proposal meets or fails the statutory requirement of sustainable ^[8] development, including evaluation of site capacity and other supporting sustainable infrastructure and methodology of assessment. It is unacceptable that a determination be based upon a Case Officer's subjective prejudicial assessment without logical Development Management justification of sustainability.

6 New London Plan (Published 2nd March 2021)

6.1 The main objective of the New London Plan Policies D1, D2, D3 & D4 is to Optimise 'Site Capacity'. The omission of the 'Density Matrix' now requires an assessment to establish the methodology to define the appropriate 'densification' based on 'Site Capacity' for 'sustainable' developments. The new London Plan at Policy D1 - London's form, character and capacity for growth, requires LPAs to undertake area assessments to define the characteristics, qualities and value of different places to develop different areas' capacity for growth. Policy D2 - Infrastructure requirements for sustainable densities require Density of proposals to be linked to the provision of future planned levels of infrastructure rather than existing levels and Policy D3 - Optimising site capacity through the design-led approach and Policy D4 - Delivering good design, requires definition of area "Design Codes" for guidance to implement the Policies.

[5] <https://drive.google.com/file/d/1v7u6ID7rqzjJDsMwQueuf5-c7x6GpZel/view>

[6]

<https://www.croydon.gov.uk/sites/default/files/articles/downloads/Development%20Infrastructure%20Funding%20Study%20%28DIFS%29%202019.pdf>

[7] London Plan (2021) Policy H2 Small Sites para 4.2.4 incremental intensification

[8] <https://www.legislation.gov.uk/ukpga/2004/5/section/39>

- 6.2 The New London Plan requires that **'Gentle Intensification'** should be actively encouraged by Boroughs in low-and mid-density locations to achieve a change in densities *in the most appropriate way* - but nowhere in the London Plan or the Croydon Local Plan is there a definition of **'Gentle Intensification'** or *"the most appropriate way"* provided to define **what this actually means!**
- 6.3 Para 4.2.4 of the New London Plan ^[9] defines the **"Incremental intensification"** criteria for existing **Outer London Boroughs'** suburban residential areas as being required to be within **PTALs 3-6** or within **800m** distance of a **train or tram station** or within **800m** of **town centre boundary**, equivalent to a **District Centre**. The location at **75 Shirley Avenue** is **PTAL 1b** and the development site is beyond the **800m** limits of these defined requirements for **"Incremental Intensification"** and as such the locality of this site is therefore **'inappropriate'** for **"Incremental intensification"**.
- 6.4 It is **unlikely** that the **Croydon Plan** will include any guidance to define the appropriate **'Design Code'** for this proposed development at this location, **prior to its adoption in 2022** unless included in a **Supplementary Planning Guidance (SPG)** intermediate Policy clarification. If a **'Design Code'** is available, we request that it be described and defined in the case Officer's Report.
- 6.5 It is noted that the new London Plan **Policy D2 - Infrastructure requirements for sustainable densities** at Para 3.2.4 States:
- "3.2.4 Minor developments will typically have **incremental impacts** on local infrastructure capacity. The **cumulative demands** on infrastructure of **minor developments** 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**."*
- 6.6 As **Croydon LPA** does **NOT** include **'Shirley'** in the Borough's **"Infrastructure Delivery Plans"** ^[10], or the **'Borough Wide'** lists, the interpretation of **Para 3.2.4** indicates an **'abnormal'** situation whereby it is necessary for **minor development applications** to include an **'infrastructure assessment'** to cater for these **cumulative** proposals *"or for boroughs to refuse permission to these schemes on the grounds of infrastructure capacity"*. This should include an assessment of all minor developments within the locality to assess **sustainability** ^[11] **as the locality does not meet the "normal" criteria statement of London Plan Policy para 3.2.4 for infrastructure delivery.**
- 6.7 **London Plan Policy D3**
- 6.7.1 **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

[9] **London Plan (2021) Policy H2 Small Sites para 4.2.4 incremental intensification**

[10] <https://drive.google.com/file/d/1v7u6ID7rqzjJDsMwQueuf5-c7x6GpZel/view>

[11] <https://www.legislation.gov.uk/ukpga/2004/5/section/39>



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.

6.7.2 These “*measurements of population density*” (London Plan **Policy D3 para 3.3.22 items 1 through 4**) although required, fail to define any *methodology* to actually use these parameters to evaluate ‘*site capacity*’ to define the acceptability or otherwise of Housing or Residential Densities. These parameters are *not even mentioned* in the London Plan (SPG’s) - **Modules A, B or C** ^[12] or **Policy H2 B.** ^[13]

6.7.3 **Policy D3** does NOT even require applicants to provide the basic ‘*Site Area*’, a fundamental parameter for evaluating “*Site Capacity*”! Thus, Para 3.3.22 is rather superfluous and irrelevant as it has no meaningful relevance in the methodology of assessment of acceptability or unacceptability of a proposal as defined by **Policy D3 - Monitoring density and ‘site capacity’** or as required by NPPF Paras 16 d) or Para 35.

6.8 The Residential **Population Density** of the (Shirley North Ward) as defined by the **GLA Data Set**, minus all the **Open undeveloped Space** within the Ward gives a good evaluation of appropriate densities in this locality which is inappropriate for “*Incremental Intensification*” as referenced in the **London Plan Policy D3 paras 3.2.4 and 3.3.22.**

6.9 The New London Plan SPG’s Modules A, B & C (consultation completed but not yet adopted) indicates “*Boroughs should prepare ‘Design Codes’ and broader forms of design governance that clarify the character of a ‘place’ and the elements that are important for new developments to respect*”.

Population Density Analysis - Shirley North Ward (GLA Data)			
Shirley North Ward [2019]	15058	Undeveloped Open Spaces:	
Area Km ²	3.279 km ²	Ashburton Playing Fields	24 ha
Area Hectares	327.9 ha	Long Lane Wood	6 ha
Population Density (per km ²)	4592.25 per km ²	Monks Orchard & Orchard Way Primary School (Playing Field)	2.4 ha
Population Density per ha (2019)	45.9225 per ha	Orchard Park High School (Playing Field)	2.25 ha
Annual Population Change (2011-2019) %	0.02 %	Parkfields Rec	4.4 ha
Population Shirley North Ward (2021)	15660	Glade Woods, Greenview Green & Kempton Walk	1.75 ha
Population Shirley North Ward per Km ²	4775.94 per km ²	Primrose Lane (Allotments & Gardens)	4 ha
Population Shirley North Ward per ha (2021)	47.7594 per ha	Shirley Oaks Village Green	6 ha
Area of Shirley North Ward minus Open	275.68 ha	Allotments (Tower View, Ash Tree Way)	1.42 ha
Average Population Density (Built Area)	56.8062 per ha	Total (Undeveloped Open Green Space Area)	52.22 ha

Average population density for Shirley North Ward (minus undeveloped Area)

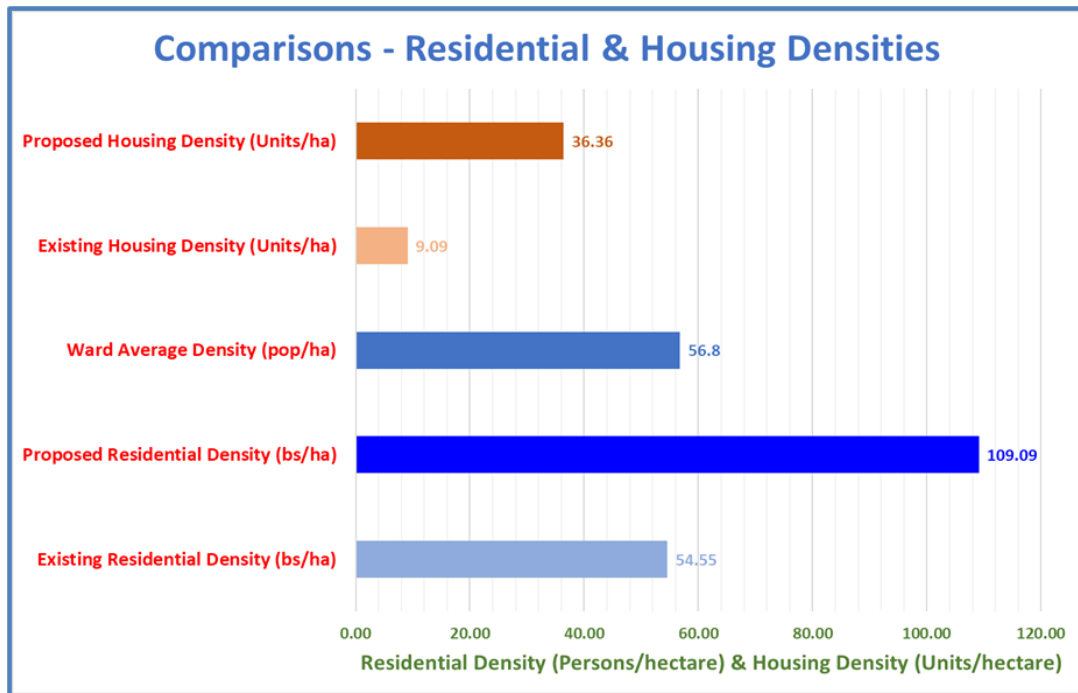
^[12]

<https://consult.london.gov.uk/good-quality-homes-for-all-londoners>

^[13]

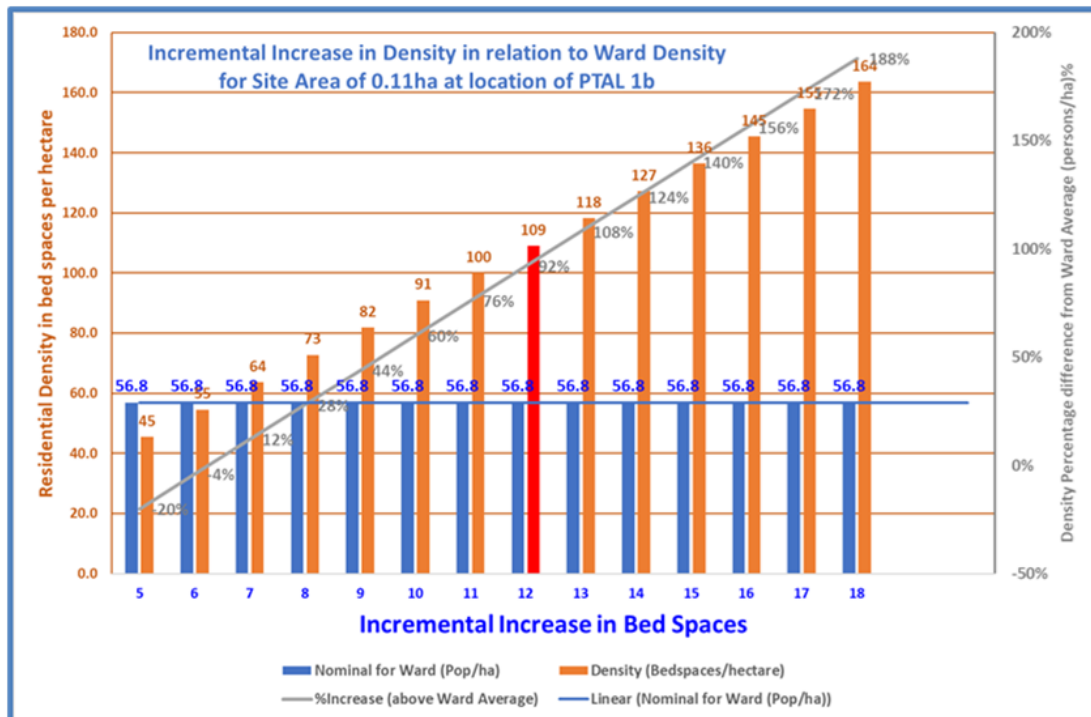
<https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/london-plan-2021>

2021



Histogram 2 - Showing Comparisons of Residential & Housing Densities with the existing and Shirley North Ward Average Population Densities

(GLA Data minus open space areas)



Histogram 1 – Incremental increase in Density of this proposed development with Site Area of 0.11ha showing actual at occupancy of 12 persons (RED)
(The RED column is the Density in bedspaces/ha for this proposal).

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6.10 At occupancy of 12 persons on a site area of 0.11ha gives an increase density of 92% above the average Density of 56.8 persons per hectare for the Shirley North Ward at PTAL of 1b and forecast to remain at 1b up to 2031.

This is **significantly greater than any interpretation of “Incremental Intensification” or “Gentle Densification”** allowed under London Plan Policy para 4.2.4. **Where on the Graph at Histogram 1 is the appropriate “Gentle Densification” or “Incremental Intensification” density point or range for this suburban site area of 0.11ha and PTAL at 1b?**

6.11 We therefore challenge the Case Officer to indicate the methodology used to assess and define the ‘**Site Capacity**’ of the proposed development, including the definition and evaluation of all parameters used for this assessment.

It can however be **logically** assumed that “**Gentle Densification**” or “**Gradual, Moderate Incremental Densification**” (**Undefined**) would have an appreciably ‘**discernible**’ reduction of **Density** than those categories listed in Croydon Local Plan **Table 6.4 - Accommodating Growth**.

7 Suburban Design Guide SPD2

Chapter 4 - Residential Extensions & Alterations

7.1 Para 4.16 TWO- STOREY REAR EXTENSIONS

- For semi-detached properties, they are located on one side of the rear of the property that does not abut the adjoining property (Refer to SPD2 Figure 4.16c); or they adjoin the neighbour where it already contains a two-storey rear extension (Refer to SPD2 Figure 4.16d). They should generally be no wider than half the width of the existing house and no deeper than 45° (in plan) as measured from the nearest habitable room window on neighbouring properties to both sides of the dwelling and should not exceed the eaves and roof ridge line of the existing house.

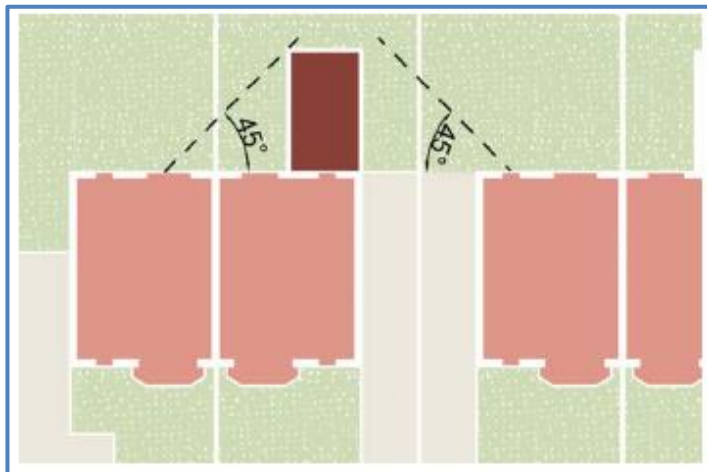
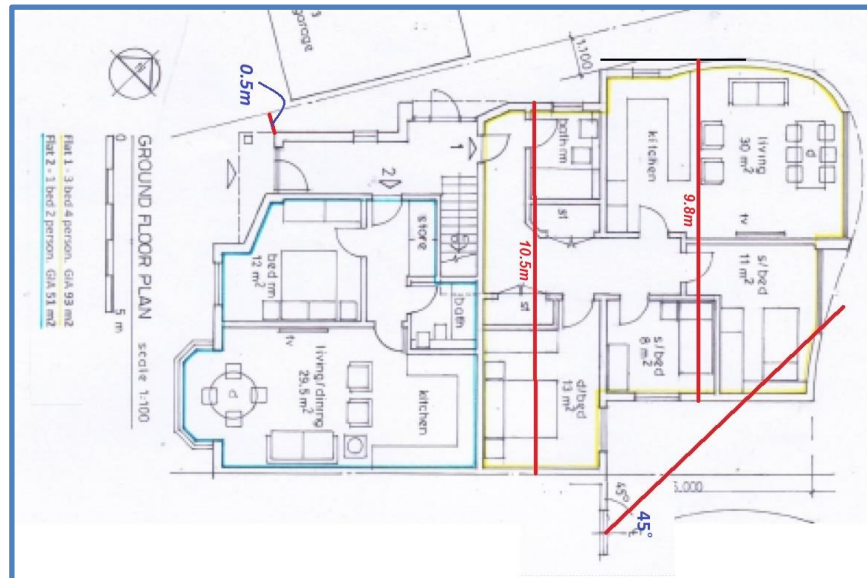


Figure 4.16c: A two-storey extension to a semi-detached house and set away from adjacent and the directly adjoining neighbours.

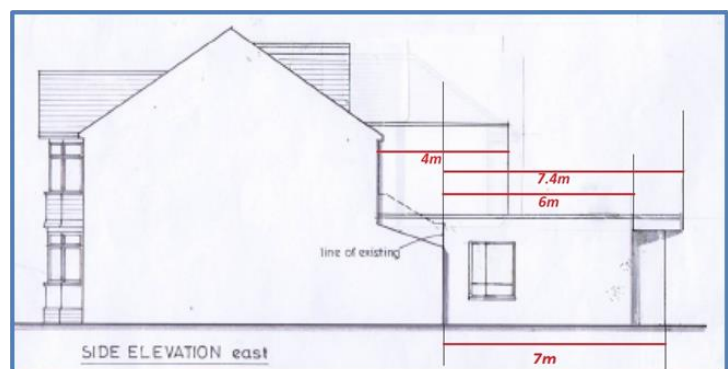
- 7.2** Although the proposed development meets the **45° Rule (Horizontal)** SPD2 para 4.16 at **First Floor Level**, the development **fails this 45° rule at Ground Floor level** as shown in the following illustration.



As this is NOT shown on the supplied Plans, it may be that there is no Habitable Room Window at ground floor level of the adjacent property but is of concern enough to raise with the Case Officer for clarification.

- 7.3** The Ground Floor Plans show the proposed extension at $\approx 9.8\text{m}$ width when the extension should generally be no wider than half the width of the existing house (5.25m) and no deeper than 45° (in plan) as measured from the nearest habitable room windows on neighbouring properties. As the plans do not show the elevation of 77 Shirley Avenue, we cannot confirm the nearest habitable room window of the adjacent property. However, we believe the width of the extension fails and exceeds the allowable SPD2 Policy Para 4.16 Two Storey Rear Extensions width.

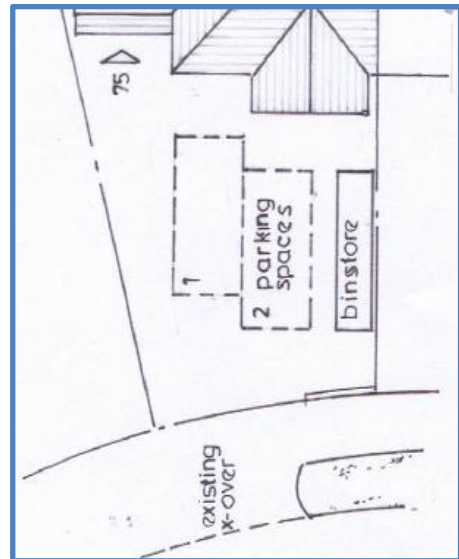
- 7.4** The depth of the extension into the rear garden at ground floor level is 7m but at the roof form increases to 7.4m . It is believed that this depth exceeds the permitted development allowed and is considered inappropriate for this locality. The measurements have been scaled off the supplied drawings (at magnification 112%).



8 CAR PARKING PROVISION

8.1 Car parking provision consists of two Off-Street parking bays servicing **12** occupants (probably 8 adults) with a car parking availability of 0.25. At a PTAL of 1b this is an unacceptable level of off-street parking provision.

- 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. It should be recognised that double yellow lines restricted parking is marked on each side of the road around the bend and a Chevron sign just below number 75 provides a recognition by the Highways Department of the dangers at this sharp bend. It should also be recognised that Shirley Avenue is a very popular cut through from Shirley Road to the A232 Wickham Road and vice versa and can be a 'rat run' during rush hours.
- Assuming 8 adult occupants of the proposed development all of whom possibly own a vehicle (car or van) would mean overspill of 6 vehicles onto the local road network for overnight parking at a PTAL 1b location; Inadequate parking for the number of occupants at PTAL 1b;
- 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.



9 Housing Targets

- 9.1** One of the reasons for Case Officers approving '*suspect*' development proposals is the stated "*compelling need for more homes*" for which The London Plan and the Croydon Plan and the Croydon Local Plan Review have published '*housing targets*' for the Places of Croydon to meet this "*need*".
- 9.2** The London plan's proposed 10-year windfall and redevelopment targets for Croydon are given in Policy H2 Small sites at Table 4.2 - 10-year targets (2019/20 - 2028/29) for Net housing completions on small sites (below 0.26 hectares) in size and for Croydon is stated to be **6,410 units** – which equates to **641 dwellings per year** for the 'whole of Croydon over the Planned period 2019/20 to 2029/30.'



9.3 Croydon Plan Review (2019):

- 9.3.1 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 (2019-2039)**, giving yearly targets of **18 to 23 units year-on-year**.
- 9.3.2 This is an **average of 20.6 dwellings per year** for the life of the plan and can be seen in the **LPA's** published (2019) **Croydon Local Plan Review – Issues and Options**, "where it clearly states, **"Homes by Place (2019-2039)"**; including the **'Shirley Place'** (which includes both the **Shirley North and Shirley South Wards**). i.e., targets **Broken down by "Place"** not by **Ward**.
- 9.3.3 The **MORA Post Code** area application approvals for **2019** as shown in the tables 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 20.6 dwellings per year**. For **2020** it is **21 dwellings** and so far for **2021** it is **25 dwellings**, including this application.
- 9.3.4 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**, (after the Ward boundary changes) so the MORA area, although only an exceedingly small portion of the **'Shirley Place'** as defined by the Croydon Local Plan, has contributed **over double the target** for the whole of the **"Shirley Place"**.
- 9.3.5 The cumulative average estimated over the two and a half years is $(48 + 21 + 25)/2.5 = 37.6$ per year (up to June 2021) which is for just the MORA post code area, which equates to an **82.5%** increase above the **20.6 Dwellings Strategic target** for the Shirley Place as a whole.
- 9.3.6 This clearly shows cumulative dwellings **significantly** exceed the strategic target defined in the Local Plan Review of **20.6 dwellings average per year**.
- 9.3.7 The MORA Post Code Area applications approvals and waiting approval for 2019 to 2021 dwellings are as shown in the Tables below.
- 9.3.8 The 2021 number of planned dwellings in the MORA **Post Code Area** has already exceeded the Target for the **Shirley Place!**
- 9.3.9 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.

9.3.10 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 or Delegate 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*?

9.3.11 NPPF Para 14 states:

In situations where the presumption (at paragraph 11d) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided all of the following apply.

- a) the neighbourhood plan became part of the development plan two years or less before the date on which the decision is made;
- b) the neighbourhood plan contains policies and allocations to meet its identified housing requirement;
- c) the local planning authority has at least a three-year supply of deliverable housing sites (against its five-year housing supply requirement, including the appropriate buffer as set out in paragraph 73); and
- d) the local planning authority’s housing delivery was at least 45% of that required over the previous three years. MORA area has been *categorically satisfied by over-provision of the strategic targets*. Why have these targets if they are *meaningless*?

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

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
Totals			6	54	48

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
174 The Glade	20/01968/FUL	27/07/20	1	2	1
11 Orchard Avenue	20/01578/FUL	03/09/20	1	2	1
195 Shirley Road	19/06037/FUL	22/09/20	1	9	8
			5	26	21

Location	Reference No.	Approval Date	Existing Dwellings	New Dwellings	Overall Increase
116 Orchard Way	20/05960/FUL	12/05/21	1	4	3
81 The Glade	21/00108/FUL	Waiting	1	9	8
176-178 Orchard Way	21/01636/FUL	Waiting	2	8	6
34 Woodmere Avenue	21/02212/FUL	Waiting	1	6	5
75 Shirley Avenue	21/02622/FUL	Waiting	1	4	3
			6	31	25

Recent Developments in the MORA Post Code Area since 2019.

10 Summary & Conclusions:

- 10.1 The foregoing reasons provide ample evidence to refuse this development proposal on grounds of character and failure to define Minimum Space Standards.
- 10.2 The proposed development is within an area of **PTAL 1b** which is *inappropriate* for “**Incremental intensification**” as it is **NOT** in an existing residential area within **PTALs 3-6** or within **800m** distance of a station ^[14] or town centre boundary ^[15] for “**Incremental Intensification**” as defined in the London Plan (2021) para 4.2.4.
- 10.3 There is NO definition of magnitude for acceptable **Gentle Densification** or **Incremental Intensification** and therefore we request that the Case Officer provides justification for the assessment of “**Site Capacity**” to meet the proposed sustainable development for this Site.

[14] Tube, Rail, DRL or Tram Station.

[15] District, Major, Metropolitan and International Town Centres.



- 10.4 The proposed development does NOT provide full evidence to meet the London Plan Minimum Space Standards with respect to In-Built Storage Space,
- 10.5 The proposal is non-compliant to requirement detailed in **SPD2 Chapter 4 - Residential Extensions & Alterations**. The Ground Floor Plans show the proposed extension at $\approx 9.8\text{m}$ width when the extension should generally be no wider than half the width of the existing house (5.25m) and no deeper than 45° (in plan) as measured from the assumed nearest habitable room windows on neighbouring properties which requires clarification but gives cause for concern.
- 10.6 The ground floor extension 7.4m into the rear garden seems excessive.
- 10.7 The proposal has inadequate parking provision at a locality of PTAL1b for 12 persons probably 8 adults who could own a car or van for business purposes. 6 vehicles may need on-street parking.
- 10.8 The strategic Housing Need for the Shirley "Place" has been exceeded by cumulative developments in the MORA Post Code Area over $2\frac{1}{2}$ years which is just a small portion of the Shirley North Ward (Not even including Shirley South Ward). Therefore, the housing need for the Shirley Place has been exceeded by recent developments and proposals in the MORA Post Code Area alone.

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



Derek C. Ritson I. Eng. M.I.E.T.
MORA Executive Committee - Planning
Email: planning@mo-ra.co

Cc:

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