

To:  
Mr James Young– Case Officer  
Development and Environment  
6th Floor  
Bernard Weatherill House  
8 Mint Walk  
Croydon  
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**From:**  
**Monks Orchard Residents'**  
**Association Planning**

12<sup>th</sup> July 2021

<http://www.mo-ra.co/planning/>

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**Reference:** 21/02795/FUL  
**Application Validated:** Wed 26 May 2021  
**Address:** 65 Gladeside Croydon CR0 7RU  
**Proposal:** Construction of single storey detached dwelling house (following demolition of existing outbuilding)  
**Status:** Awaiting decision  
**Consultation Expiry:** Sun 18 Jul 2021  
**Determination Deadline:** Wed 21 Jul 2021  
**Case Officer:** James Young

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 and Residential Extensions & Alterations **must** be **sustainable** <sup>[1]</sup> and meet the current and emerging planning policies to ensure future occupants have acceptable living standards and acceptable accessibility to public Transport Infrastructure. We only object when proposals do not comply with current adopted or emerging planning policies designed to minimise overdevelopment and retain the local character within acceptable constraints or vaguely specified policies which are subject to varying interpretations.

## 1 Proposed Development Parameters:

Site Area	46 sq.m.	<b>Residential Density</b>		652.1739 hr/ha	<b>PTAL</b>				
Site Area	0.0046 ha	<b>Residential Density</b>		869.5652 bs/ha	2011		1b		
		<b>Housing Density</b>		217.3913 u/ha	2031		1b		
Dwelling Chalet Bungalow	<b>Floor</b>	<b>Bedrooms</b>	<b>Bed Places</b>	<b>Habitable Rooms</b>	<b>GIA Offered</b>	<b>GIA Required</b>	<b>Outdoor Amenity Space Offered</b>	<b>Outdoor Amenity Space Required</b>	<b>Car Parking Spaces</b>
	1	Ground	1	2	2	36	79	6.63	5
		Roof-Space	1	2	1	10			
<b>Totals</b>		<b>2</b>	<b>4</b>	<b>3</b>	<b>46</b>	<b>79</b>	<b>6.63</b>	<b>5</b>	<b>0</b>

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

## 2 Space Standards

- 2.1 The proposed development is squeezed into a rear garden and has inadequate Gross Internal Area (GIA). The Application form indicates GIA of **44m<sup>2</sup>**, but the plans show **46m<sup>2</sup>** when the London Plan minimum Space Standards at **Table 3.1** requires **79m<sup>2</sup>** for a **2-bedroom 4-person** accommodation over **two floors** (See below) even though the proposal has a shower rather than a bath in the washroom (wet room). As the second Bed Space for two persons is above the ground floor living quarters, accessed by a staircase, we consider it as **Two Storeys**.
- 2.2 There is also a requirement for minimum **2m in-built Storage** Space, when **none has been provided**. **In-Built Storage** is a necessity to contain normal living clutter and such items that need to be kept but not just lying around untidily.
- 2.3 **London Plan** Para 3.6.2 States:
- 2.3.1 *Para 3.6.2 The space standards are minimums which applicants are **encouraged to exceed**. The **standards apply to all new self-contained dwellings** of any tenure, and consideration should be given to the elements that enable a home to become a comfortable place of retreat.*

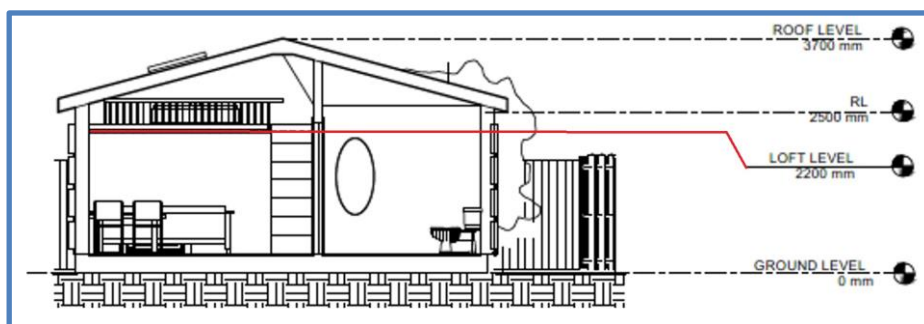
**Table 3.1 - Minimum internal space Standards for new dwellings**

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

### London Plan Table 3.1 Minimum Internal Space Standards

## 3 Headroom (Loft)

- 3.1 The Section View on the plan shows the Loft Level at **2200mm** (2.2m) but it is not clear whether this is a projected measurement from the Ground Floor ceiling level or the Loft Floor level.
- 3.2 The Headroom in the bedroom in the roof space is totally inadequate being a maximum at the centre of  $\approx 1.5\text{m}$  ( $3.7\text{m} - 2.2\text{m}$ ) and tapering down to  $\approx 0.75\text{m}$  at the centre of the room (floor to ceiling) and about  $\approx 0.3\text{m}$  above the bed. This is very claustrophobic and unacceptable and believed fails the London Plan Space Standards Policy H2.



**Sectional Elevation**

3.3 Any area with a **headroom** of less than **1.5m** is not counted within the **Gross Internal Area** unless used solely for *storage*. The minimum floor to ceiling height **must** be **2.5m** for at least **75%** of the **Gross Internal Area (GIA)** of each dwelling. This proposed development fails this requirement and would reduce the available **GIA** to even less than that claimed which is already below the London Plan requirement by **30m<sup>2</sup>** (79m-46m) for a two-storey dwelling.

3.4 The proposal has no dedicated Play Space for children of the future occupants.

## 4 Site Layout and Capacity

4.1 The Proposed Development fronts **Fairhaven Avenue** and does **NOT** follow the established Building Line of Fairhaven Avenue.

4.2 The proposed development **Site Capacity** accommodating **4 Bedspaces** at a locality of **PTAL 1b** of **Site Area 0.0046ha** would be a residential density of **869.57bs/ha** (Bed spaces per hectare) or **652.17hr/ha** for **3** habitable rooms and Housing Density of **217.4Units/ha**. (Presuming the Bed Space in the loft is considered an additional room).

4.3 This is significantly higher compared to an average **Residential Density** of **56.8 occupants per hectare** for **Shirley North Ward** <sup>[2]</sup> (After deducting Open Space Areas) would be an extremely **high Density** for the **Site Capacity** in suburban setting at **PTAL 1b** and forecast to remain at **PTAL 1b** up until 2031.



### Google Image: Walking Distance to the nearest Arena Tram Stop at ≈880.02metres

4.4 The **London Plan (2021) Policy H2 – Small Sites, Para 4.2.4** indicates that **Incremental Intensification** is **'inappropriate'** at **PTAL** levels below **PTAL 3** and suburban locations greater than **800m** from **Train/Tram Station** or **District Centre**. It is understood that the walking distance to the Arena Tram Station is approximately **≈880m** (as measured on Google Earth Image above). The proposal is therefore **'inappropriate'** for **Incremental Intensification**.

[2] [https://www.citypopulation.de/en/uk/london/wards/croydon/E05011482\\_shirley\\_north/](https://www.citypopulation.de/en/uk/london/wards/croydon/E05011482_shirley_north/)

## 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** <sup>[3]</sup> – (Section 39(2) of the Planning and Compulsory Purchase Act 2004) and NPPF <sup>[4]</sup> Section 2 - Achieving sustainable development. In order to comply with this **legal requirement**, a criterion or definition of sustainability and the measurable quantifiable parameters for assessing sustainability within the proposed development **Site Capacity** are necessary for definition of the **sustainability criterion** in the Local Plan but **are conveniently omitted** by the Spatial Planning authors of the adopted Local Plan.

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

### 5.2 Croydon Local Plan Policy Table 6.4 - Accommodating growth.

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>Focused 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

5.3 The Croydon Local Plan (2018) ‘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 existing and future infrastructure’ <sup>[5]</sup> or ‘Public Transport Accessibility’ <sup>[6]</sup> 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

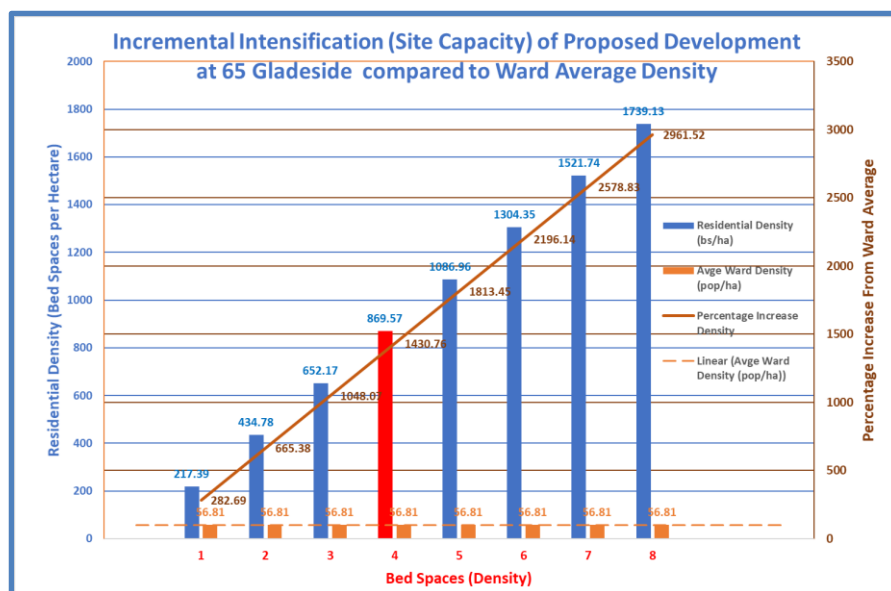
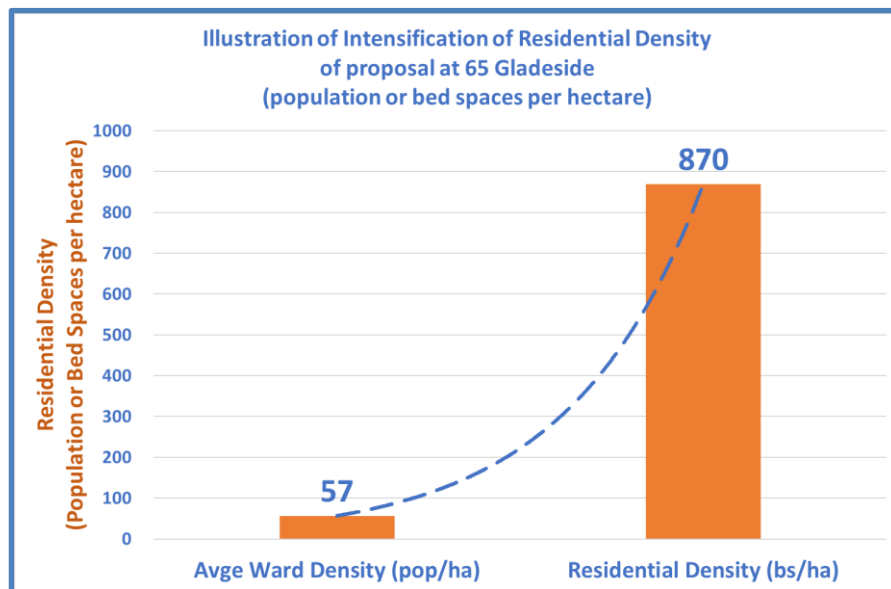
[3] <https://www.legislation.gov.uk/ukpga/2004/5/section/39>

[4] [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/81019/7/NPPF\\_Feb\\_2019\\_revised.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/81019/7/NPPF_Feb_2019_revised.pdf)

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

[6] <https://www.croydon.gov.uk/sites/default/files/articles/downloads/Development%20Infrastructure%20Fund-ing%20Study%20%28DIFS%29%202019.pdf>

the guidance required in **NPPF (2019) [7] Section 3. Plan-making** and specifically **NPPF para 16 d) or Para 35, a) Positively prepared, b) Justified, c) Effective & d) Consistent with National Policy** or importantly the **Statutory requirement to ensure ‘Sustainable Developments’ [8]**. The Policy provides a **vague objective** that does not consider the limits or allow a substantive determination reflecting the new **London Plan Policy H2 at para 4.2.4 [9]** or to determine the criteria how areas **‘inappropriate’** for **“Incremental intensification”** should be assessed.



**Illustrations of proposed development ‘Site Intensification’ in a locality PTAL of 1b ‘inappropriate’ for incremental intensification.**

[7]

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/81019/7/NPPF\\_Feb\\_2019\\_revised.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/81019/7/NPPF_Feb_2019_revised.pdf)

[8] This is a legal requirement of Local Planning Authorities exercising their plan-making functions (section 39(2) of the Planning and Compulsory Purchase Act 2004).

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

- 5.4 In determining this proposed development, we challenge the case officer to provide quantifiable justification, how this development proposal meets or fails the **statutory requirement of sustainable development**, <sup>[10]</sup> including assessment of ‘**site capacity**’ and other supporting **sustainable infrastructure** requirements including the methodology of assessment. ***It is unacceptable that a determination based upon a Case Officer’s subjective prejudicial assessment can be recommended without logical justification of ‘Site Capacity’ sustainability***<sup>[10]</sup>.

## 6 Back Garden Development

- 6.1 The current adopted Croydon Local Plan (2018) **Policy DM10.1** states:

*“In the case of development in the grounds of an existing building which is retained, development shall be **subservient** to that building. The council will take into account cumulative impact.”*

And at Policy **DM10.4 e)**:

*“In the case of development in the grounds of an existing building which is retained, a minimum length of 10m and no less than half or 200m<sup>2</sup> (whichever is the smaller) of the existing garden area is retained for the host property, after the subdivision of the garden.”*

- 6.2 The adopted **Croydon Local Plan Policies** do **NOT** define the parameters to which a development proposal should be ‘**subservient**’. The Policy could be referring to the physical structure or the accommodation capacity or another possible description of ‘**subservience**’. It is understood that the objective of ‘**subservience**’ relates to the physical appearance of a proposed back garden development, which should be subordinate or less obtrusive to the host dwelling.
- 6.3 We presume therefore that the proposed development meets the requirement of DM10.4.

## 7 Refuse and Recycling.

- 7.1 It is presumed the STO area on the front left of the entrance is for storage of Refuse and Recycling Bins. However, the requirement for residents is at least three bins per dwelling which would require **1.8m<sup>2</sup> to 2m<sup>2</sup>** floor area when the proposed development allocation is only **1m<sup>2</sup>**.

## 8 Summary

- 8.1 We believe there are sufficient grounds to refuse this application based on the foregoing assessment.
- 8.2 The Proposed Development does NOT follow the Building Line of Fairhaven Avenue.
- 8.3 The proposal fails to meet the required Gross Internal Area (GIA).
- 8.4 The proposal has no allocated in-built storage space.
- 8.5 The proposal has no dedicated Play Space for children of the future occupants.
- 8.6 The Space Standards are a Minimum which should be exceeded if at all possible.

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



- 8.7 The bedroom in the loft roof space has inadequate headroom of a maximum at the centre at approximately ≈1.5m (3.7m - 2.2m) and tapering down to ≈0.75m at the room edge. The minimum floor to ceiling height must be 2.5m for at least 75% of the Gross Internal Area (GIA).
- 8.8 The location as defined by **London Plan Policy 4.2.4** is *inappropriate* for **Incremental Intensification** and the proposal at **869.57bs/ha** (bedspaces per hectare) would present a **1048.07%** increase in **Density** above the **GLA** average **Residential Density** for the **Shirley North Ward** of **56.81bs/ha** (bedspaces per hectare). This is a significant increase in **Residential Density** which could **NOT** realistically be described as *“Gentle Densification”* in a **Suburban** locality of **PTAL 1b** and as stated *‘inappropriate’* for *‘Incremental Intensification’*.
- 8.9 The adopted Croydon Local Plan (2018) and the New London Plan (2<sup>nd</sup> March 2021) does not define the acceptable parameters of *‘Incremental Intensification’* or *‘Gentle Densification’*, but it can be logically presumed 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**
- 8.10 The Applicant has **NOT** provided a Planning Statement or Design & Access Statement accessible on the **LPA Public Access Register** – Document Tab.

Please register this submission as **Monks Orchard Residents’ Association (Objects)** on the Comments Tab of the on-line Public Register and inform us of your recommended decision in due course.

Kind Regards

Derek



**Derek C. Ritson I. Eng. M.I.E.T.**  
**MORA Executive Committee – Planning**  
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Cc:

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Cllr. Sue Bennett	Shirley North Ward
Cllr. Gareth Streeter	Shirley North Ward
Cllr. Richard Chatterjee	Shirley North Ward

Bcc:

MORA Exec. Committee, Local Affected Residents & Interested Parties.