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**Monks Orchard Residents'
Association
Planning**

29th December 2021

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Reference: 21/06036/FUL
Application Received: Fri 03 Dec 2021
Application Validated: Fri 03 Dec 2021
Address: Land R/O Firsby Avenue & Verdayne Avenue, CR0 8TL
Proposal: Erection of nine semi-detached and terraced houses, together with associated access, car parking and landscaping.
Status: Awaiting decision
Consultation Expiry Date: Sun 02 Jan 2022
Determination Deadline: Fri 28 Jan 2022
Case Officer: Neil McClellan

Dear Mr McClellan

Please accept this letter as a formal response to **Application Ref: 21/06036/FUL** for Erection of nine semi-detached and terraced houses, together with associated access, car parking and landscaping at Land R/O Firsby Avenue and Verdayne Avenue.

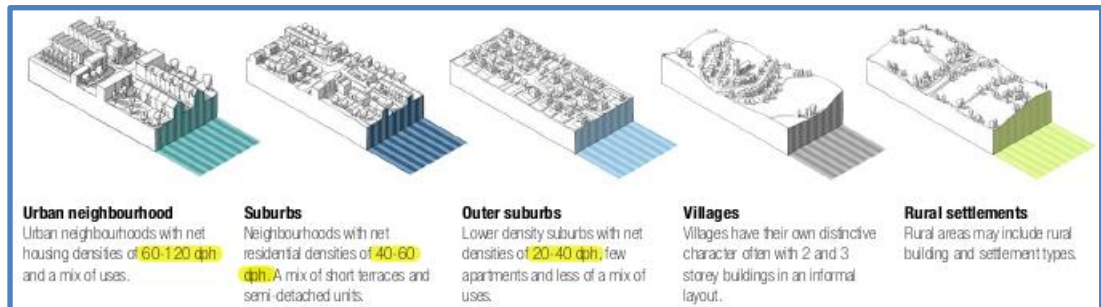
Parameters of Proposed Development:

Land to The South of Firsby Avenue & East of Verdayne Avenue, Shirley														
Post Code	CR0 8TL	Site Area	2400	sq.m.		Residential Density:	241.67	hr/ha	PTAL			Floor Area Ratio		0.46625
Received:	03/12/2021	Site Area	0.24	ha		Residential Density:	220.83	bs/ha	2011	2	Play Space Required			
Validated	03/12/2021	Units	9			Housing Density:	37.5	u/ha	2031	2				
Units	House Type	Floor	Bedrooms	Bed Spaces	Habitable Rooms	GIA (Offered)	GIA (Required)	In-Built Storage (Offered)	In-Built Storage (Required)	Cycle Storage	Car Parking	Amenity Space (Required)	Estimated Number of Adults	Estimated Number of Children
Unit 1	Type 1 M4(2)	Ground	0	0	2	44	99	0.8	2.5	2	1	8		
		First	2	3	3	42		0.8						3
		Second	1	2	1	26		Not Stated					2	
Unit 2	Type 1 M4(2)	Ground	0	0	2	44	99	0.8	2.5	2	1	8		
		First	2	3	3	42		0.8						3
		Second	1	2	1	26		Not Stated					2	
Unit 3	Type 1 M4(2)	Ground	0	0	2	44	99	0.8	2.5	2	1	8		
		First	2	3	3	42		0.8						3
		Second	1	2	1	26		Not Stated					2	
Unit 4	Type 1 M4(2)	Ground	0	0	2	44	99	0.8	2.5	2	1	8		
		First	2	3	3	42		0.8						3
		Second	1	2	1	26		Not Stated					2	
Unit 5	Type 3 M4(3)	Ground	0	0	2	48	99	1.9	2.5	2	1	8		
		First	2	3	3	46		0.6						3
		Second	1	2	1	29		Not Stated					2	
Unit 6	Type 2 M4(2)	Ground	0	0	2	50	121	0	3	2	1	10		
		First	3	5	3	50		1.3						5
		Second	1	2	2	37		2.1					2	
Unit 7	Type 2 M4(2)	Ground	0	0	2	50	121	0	3	2	1	10		
		First	3	5	3	50		1.3						5
		Second	1	2	2	37		2.1					2	
Unit 8	Type 2 M4(2)	Ground	0	0	2	50	121	0	3	2	1	10		
		First	3	5	3	50		1.3						5
		Second	1	2	2	37		2.1					2	
Unit 9	Type 2 M4(2)	Ground	0	0	2	50	121	0	3	2	1	10		
		First	3	5	3	50		1.3						5
		Second	1	2	2	37		2.1					2	
Totals			31	53	58	1119	979	22.5	24.5	18	9	80	18	35

We understand the need for additional housing, but that new housing developments must be **sustainable** and meet the current and emerging **planning policies** to ensure future occupants have acceptable living standards and acceptable accessibility to Infrastructure and Public Transport services.

1 The National Model Design Code & Guidance¹ Pts 1 & 2.

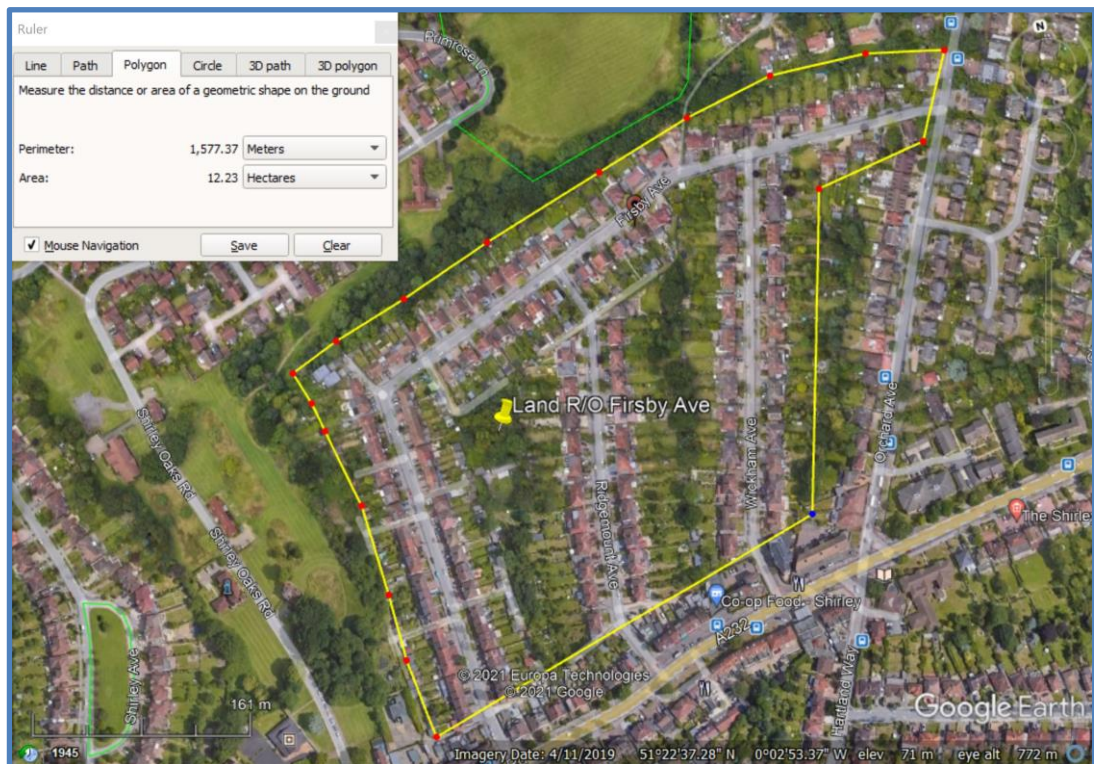
1.1 The Housing Densities for the 'Settings' of 'Outer Suburban', 'Suburban' and 'Urban' are defined in the **National Model Design Code Part 1 - The Coding Process, 2B - Coding Plan, Figure 10 Page 14.**



The National Model Design Code Parameters Definitions for Local Settings.

2 Local Area Design Code:

2.1 Local Area for Design Code Assessment



Area for assessment of Local Design Codes bounded by Verdayne Ave, Firsby Ave, Wickham Ave and Wickham Road.

¹ <https://www.gov.uk/government/publications/national-model-design-code>

2.1.1 Local Area Data analysis for (existing) evaluation of Design Codes.

Land R/O Firsby Ave Design Code Data				
Design Codes - Post Code Group.				
Street	Post Code CRO	Number of Occupants	Number of Dwellings	Occupancy
Wickham Ave. W	8TZ	63	26	2.42
Wickham Ave. E	8TY	68	24	2.83
Verdayne NW	8TW	73	28	2.61
Verdayne W	8TU	62	21	2.95
Verdayne E	8TS	98	37	2.65
Ridgemount W	8TR	59	22	2.68
Ridgemount E	8TQ	66	23	2.87
Firsby N	8TP	80	37	2.16
Firsby S	8TN	39	14	2.79
Firsby S	8TL	36	14	2.57
Total		644	246	
Average per Post Code		64.4	24.6	2.65

Assessment of Number and Occupancy of Housing Units within the Design Code Area.

Area	12.23	ha
Housing Density	20.85	units/ha
Residential Density	56.99	Persons/ha
Ward Average Density (From GLA Data)	56.80	Persons/ha
PTAL 2011	2	
PTAL 2031	2	
Set Back building line from footway	6.5m	Average
Rear Garden length	>20m	length

Assessment of Design Code Parameters for Locality

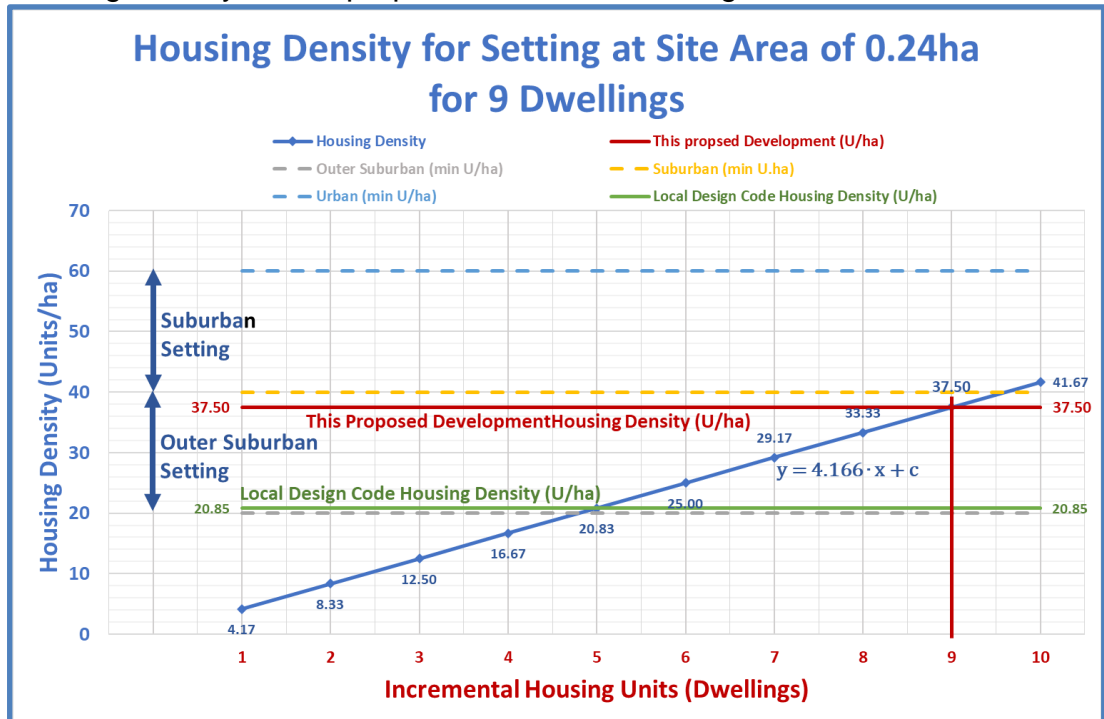
2.2 Assessment of Various Areas of the locality, Design Codes

2.2.1 Design Codes and Settings Assessment for localities for comparisons.

Design Code Summaries (Housing, Residential Densities & Settings)						
Location	Area (ha)	Population	Dwellings (Units)	Residential Density (bs/ha)	Housing Density (Units/ha)	Setting for Design Code Density
Shirley North Ward	327.90	15666	6555	47.78	19.99	<Outer Suburban
Shirley South Ward	387.30	14147	5919	36.53	15.28	<Outer Suburban
All Shirley	715.20	29814	12474	41.69	17.44	<Outer Suburban
MORA Area	178.26	9283	3884	52.07	21.79	Outer Suburban
Area Design Code	12.23	697	255	56.99	20.85	Outer Suburban
Development Site	0.2400	53	9	220.83	37.50	Outer Suburban

Table of assessments shows that all local areas are below or just within the Outer suburban Setting as is the proposed development.

2.2.2 Housing Density for the proposed Site and its Design Code:



2.2.3 The proposal Housing Density is therefore clearly within the limit of the local Setting of “Outer Suburban” locality although a **79.86%** increase on the existing Design Code Density. If this proposal is Phase 1 of the proposal and a similar development is subsequently proposed for the southern area – (Phase 2), the likelihood is that it would raise the Density above 40units/ha and change the Local Density setting to a Suburban Setting.

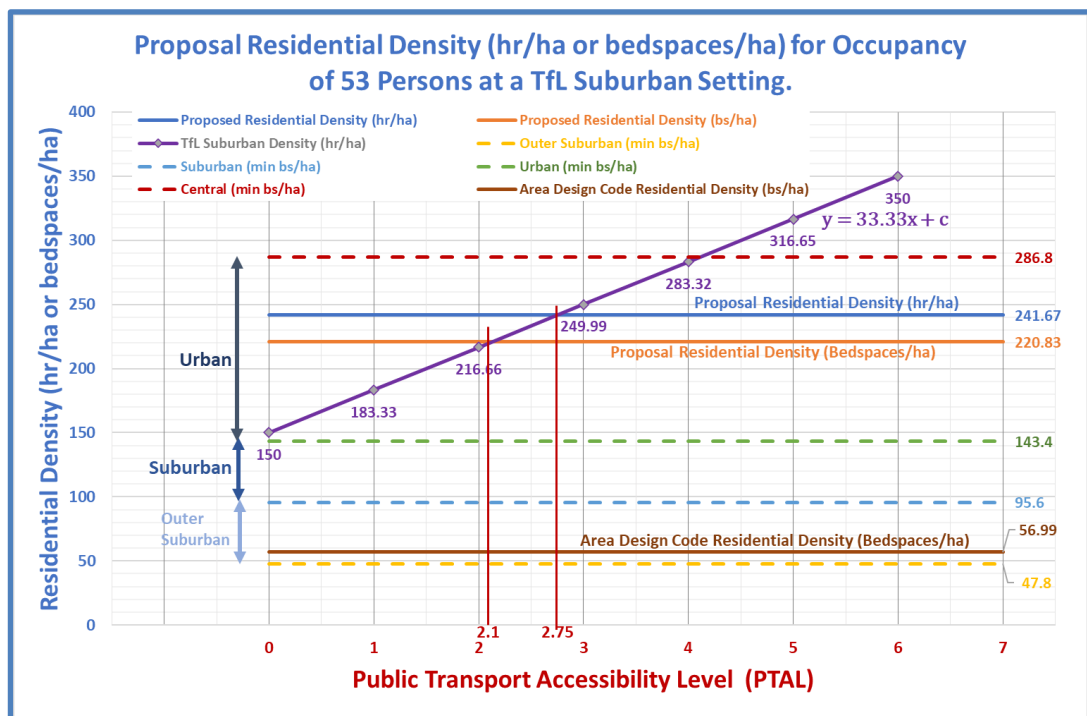
2.3 Residential Densities.

2.3.1 It is people who require supporting infrastructure, NOT Dwellings, so we need to establish equivalent **Residential Densities** ranges for each of the ‘Settings’. The Local Plan, the London Plan, the NPPF or the National Model Design Code guidance does not relate Residential Density to the ‘Setting’ (Outer Suburban, Suburban or Urban etc.). This can be achieved by using the Office of National Statistic’s data and Statista² data. In 2020, the average number of people per household in the United Kingdom was **2.39** compared with 2.37 in the previous year. We can use this as a factor to convert equivalent Units/ha to Bedspaces/ha as shown in the following Table.

Setting	Housing Density		Residential Density	
	Min	Max	Min	Max
Outer Suburban	20	40	47.80	95.60
Suburban	40	60	95.60	143.40
Urban	60	120	143.40	286.80
Central	120		286.80	

² <https://www.statista.com/statistics/295551/average-household-size-in-the-uk/>

- 2.3.2 Using this data, and TfL Connectivity data, we can plot and illustrate the required **Settings** for this proposed **Residential Density** in both hr/ha and bedspaces/hectare which gives an estimated relationship between **Residential Density** and **PTAL** for each of the ‘**Settings**’
- 2.3.3 Residential Density of proposal against the **National Unit Occupancy**³ and TfL **Suburban Setting**⁴.



Assessment of proposal Residential Density in relation to Setting and PTAL

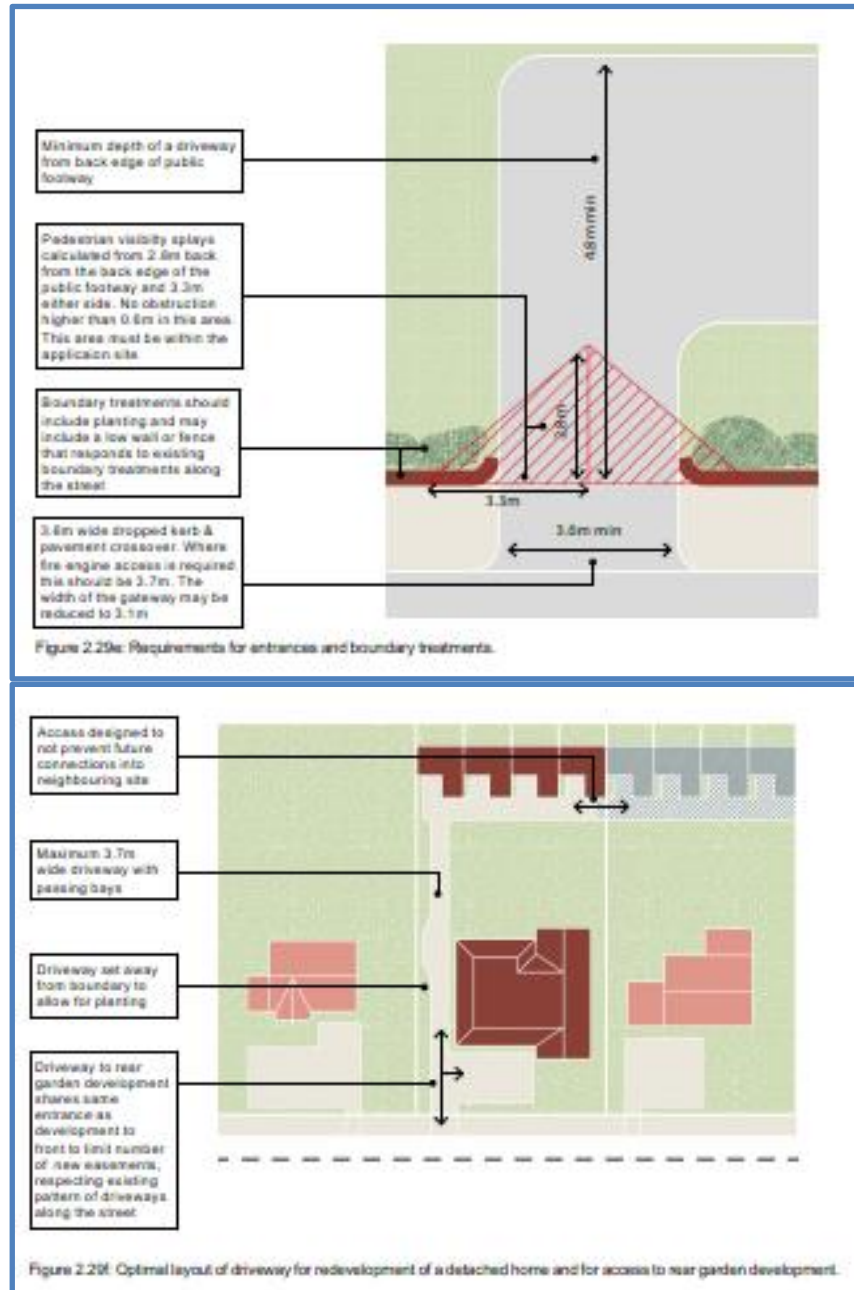
- 2.3.4 The **Residential Density** analysis shows that the required **PTAL** to support a proposed **Residential Density** of **241.67 hr/ha** would be:
 $241.67 = 33.33 \cdot x + 150$ therefore $x = \text{PTAL} = \mathbf{2.75}$ or,
Residential Density of **220.83 bedspaces/ha** would be:
 $220.83 = 33.33 \cdot x + 150$ therefor $x = \text{PTAL} = \mathbf{2.1}$.
- Thus, we believe this is probably within an acceptable tolerance from the available **PTAL** of **2** at this location. This assumption is based upon the **ONS** and **Statista** Data of **National Occupancy per Dwelling**.
- 2.3.5 However, the proposal, if approved, would increase the **Design Code Area population** to **697** and increase the number of Dwellings to **255** with an average occupancy of **2.95 Persons per Dwelling** compared to the National Average of **2.39**. This would increase the **Residential Density Design Code** from the current **52.66 bs/ha** to **56.99 bs/ha**, as shown on the above graph. The conversion from **Housing Density** to **Residential Density** using the Statista⁵ conversion factor puts the proposal's **Residential Density** at **241.67hr/ha** and **220.83 bedspaces/ha** in an

³ <https://www.statista.com/statistics/295551/average-household-size-in-the-uk/>

⁴ <https://content.tfl.gov.uk/connectivity-assessment-guide.pdf>

⁵ <https://www.statista.com/statistics/295551/average-household-size-in-the-uk/>

point would reduce the width to 3.45m which is less than the SPD2 recommended minimum width of 3.7m. (3.6m at the entrance)



- 4.1.6 In addition, at these widths, there is no available space for a footpath for pedestrians or persons with children or pushchairs. There is also no possible provision for Passing Bays in the event of a vehicle accessing the Access Driveway when pedestrians are using the access drive.
- 4.1.7 This situation even further exacerbated if a wheelchair bound person is using the access drive, which may reasonably be assumed as Unit 5 is to M4(3) Wheelchair requirement and the occupant may use the drive as access to their dwelling from Firsby on a regular basis. Again, there is no safe footpath or passing bay mid length along the narrow access drive. These are significant safety issues that need to be considered before a determination of this proposal.

4.2 Fire Safety

- 4.2.1 It is understood a Fire Tender has length **10.5m** and width **2.3m** leaving **1.3m** clearance either side at the entrance and **8cm** either side at the narrowest mid-point of **3.9m**. It is not clear from the Design and Access Statement whether the “T” Turning Head or “Y” Turning Head would allow a Fire Tender to manoeuvre from a forward gear on entering, to manoeuvre and exit in a forward gear through the access drive and over the footpath into Firsby Avenue.
- 4.2.2 From a local Resident’s investigation, the nearest **Fire Hydrants** are outside **47 Verdayne Ave., (~210m)** and outside **36 Ridgemount Ave., (285m)**. It is understood the maximum distance of a Fire Hydrant from the proposed dwellings should be within **100m** and if greater, a new Fire Hydrant needs to be provided within **90m** of the site.

4.3 Refuse and Waste Collection

- 4.3.1 The Waste & Recycling Guidance published by the London Borough of Croydon⁶ suggests the minimum width of the roadway should be **5m** but should allow additional allowance if the vehicle requires an approach from an angle, which applies in this case.
- 4.3.2 It is understood that a Refuse Collection Vehicle ‘**Dustcart**’ has length **11.5m** and width **2.6m** leaving **1.15m** either side at the entrance and **65cm** either side at the narrowest. Again, these measurements are prior to the installation of any kerbs in the upgrade of the access road.
- 4.3.3 The Refuse Vehicle Manoeuvre from Firsby Ave., (approx. 5.8m wide Road) into the Site to allow sufficient swing to get the vehicle into the access drive in one manoeuvre would probably require local parking restrictions. It is likely that double yellow line parking restrictions would be needed on both sides of Firsby Ave., for at least 30m either side from both Easterly and Westerly directions. The Highways Department may take the opportunity to extend the double yellow line restriction around the bend with Verdayne Ave.
- 4.3.4 The Waste & Recycling Guidance states at paragraph 4.8 of Section 4 the Pull Distance from vehicle to refuse Bin should be no more than **20m** which means the Refuse Vehicle **MUST** enter the **Access Drive** for at least **40m** to be within **20m** from the furthest dwelling. This puts the vehicle **clear** of the narrow section of the access drive and well into the site. (See: Ref 3 para 4.8).
- 4.3.5 The Guidance published by the London Borough of Croydon at Section 8 requires:

*“8.1 Roadway Strength - Roads should have foundations and hard-wearing surface capable of withstanding a fully laden Waste Collection Vehicle of **38 Tonnes Gross vehicle weight with a maximum axles weight of 11.5 Tonnes.**”*

As far as we could determine, the applicant’s provided documentation does not indicate whether the access drive would be improved to meet this required specification or standard or whether it would be properly kerbed. If both sides are kerbed, what would be the **minimum and maximum kerb to kerb widths?** Also, Dropped Kerbs would need to be provided for access to the rear garages of **74 to possibly 50 Verdayne Ave.** Also, to what specification and standard would the extension of the driveway be to the rear access of Nos. 2 to 10 Firsby Avenue, and would this section be upgraded at all.

⁶ https://www.croydon.gov.uk/sites/default/files/Bins%20and%20recycling/New_build_guidance.pdf

- 4.3.6 The Turning Head should permit a Turning Circle of **17m kerb-kerb** or **20.3m wall-to-wall**. It is not clear from the **Design and Access Statement** whether this has been provided in the “Y” turning head or the “T” turning head. Swept path diagrams should be provided to confirm the possibility of this manoeuvre.
- 4.3.7 Refuse collection vehicles should not be required to reverse more than **25 metres** and then only in exceptional circumstances. Therefore, the Refuse Collection vehicle would need to use the “Y” or “T” turning head to exit in a forward gear. It is not clear whether this would be possible. Swept path diagrams should be provided to confirm the possibility of this manoeuvre.
- 4.3.8 In order to assess the ingress and egress of both Fire Appliances (which may possibly have a trailer) and Refuse Vehicles, it would be appropriate that swept path diagrams and illustrations be provided for each vehicle type to prove evidence of acceptable manoeuvrability on the proposed site.

4.4 Access Drive Ownership.

There is confusion with regard to the site boundary limits.



Pre-Application Concept



Site Strategy

- 4.4.1 The Design and Access Statement at the 2.3 “Concept Pre-Consultation” Site Layout shows the East Edge Site boundary to follow the edge of the access lane whereas the 3.4 “Site Strategy” shows the East boundary at the rear of numbers 50 to 60 Verdayne Avenue to have absorbed the parcel of land between the rear boundaries of the properties and the east edge of the access lane from Firsby Avenue. This difference is of significant concern as ownership could become a “Ransom Strip” and preclude ingress and egress from the rear of these properties and access to their garages.

The Listed Land Registry Title Numbers on the Application Form at Item 5 are:

SGC 124640
SGC 119069
SGC 121093
SY 281091

- 4.4.2 The Land Registry Title Deeds of No. 70 Verdayne Avenue, Title No. SY 3907 indicate the Rear Access has shared responsibility with other users who have access to their

garages at the rear of their gardens. Presumably this is the same for Nos. 50 to 74 Verdayne Ave.

- 4.4.3 The area disputed is approx. 105.5m² \approx 0.01ha reducing the Site Area to \approx 0.23ha which changes the Housing and Residential Densities

Residential Density:	252.17	hr/ha
Residential Density:	230.43	bs/ha
Housing Density:	39.13	u/ha

to those shown. However, this change although increasing the Densities, does not change the overall assessment significantly but is an increase that should be considered by Officers when making a determination.

- 4.4.4 **Therefore, the householders of 50 to 74 Verdayne Avenue must have continued free and unfettered access and use of the Access driveway to their garages and rear gardens via the Access Drive. This access needs to be continued and included as Restrictive Covenants in the Deeds of all the proposed properties if the application is approved.**

5 Parking

- 5.1 The Planning Statement at para 5.4.1 states an allocation of 1 Space per dwelling and that "Each bay will comprise a Blue Badge space". The plans do not confirm this to be the case as Plot 1 Parking Bay does not have wide access within the curtilage of the dwelling requiring encroachment over the footpath for the full length of the Bay. All others have wide Access.
- 5.2 The London Plan residential parking provision for Outer London suburbs at PTAL 2 to PTAL 3 for Units with 3+ Beds, is up to a maximum of 1 space per Dwelling. The proposal meets this requirement.

6 Landscaping

- 6.1 The proposed Landscape Master plan shows a tree line planting on the southwest boundary, which would be restrictive to access to the rear garages and properties of 52 to 60 Verdayne Avenue.

- 6.2 The Restrictive covenants quoted in the Title deeds of these dwellings require access to the rear access drive and for this access to remain free to use. The row of trees would severely limit free and fair access and is therefore unacceptable for this development proposal.

- 6.3 The provided Plans and illustrations show the applicant has acquired the land between the rear gardens of properties in Verdayne Avenue and the edge of the rear access driveway from Firsby Avenue. This could result in the loss of unfettered access to and from the rear gardens and garages of those properties which have had this access since the properties were built, probably in the 1930s 1940s, and this strip of land could be considered a "ransom strip" in the event of an approval. We therefore challenge this situation.



7 Targets

7.1 The Revised Local Plan⁷ (Cabinet 6th December 2021)

- 7.1.2 Planning Officers and Committee members quote the need for housing as a prime objective of planning approvals even when non-compliant to planning Policies.
- 7.1.3 The **Revised Croydon Plan** has revised targets for “**Places**” over the period **2019 to 2039** and at Table 3.1 (page 31) states the target for the Shirley “**Place**” to be **278 Dwellings** over the period **2019 to 2039**. This equates to an average year-on-year for the Shirley “**Place**” of **13.9 dwellings/year**.

MORA Area re-developments			
Year	Existing Dwellings	New Dwellings	Overall
2019	6	54	48
2020	5	28	23
2021	10	68	58
Total	21	150	129
Average per year	7.00	50.00	43.00
At the MORA rate of 43 Units/Year over 20 yr period =			860
Total Dwellings at 2039			4744
MORA Current Housing Density		21.79	Units/ha
MORA Housing Density at 2039		26.61	Units/ha
MORA Percentage increase in dwellings		22.14	%

- 7.1.4 However, as shown, the **MORA Area** is **178.26ha** which is less than the **Shirley North Ward Area** of **327.9ha** or the **Shirley South Ward** of **387.3ha** or the combined **Wards of Shirley** at **715.2ha**. Therefore, the MORA area is significantly less than the Area of the Shirley “Place” and should suffer a proportionally LESS Target than the Shirley Place.
- 7.1.5 However, the rate of increase in the number of dwellings in the **MORA Area** is significantly exceeding the **Target** as redefined in the **Revised Local Plan** of **278 Units** over **20 years** to **860 units**, a **209.353%** increase (see table).

7.2 Development Management

- 7.2.1 The recommended methodology to manage increased Housing Units within the acceptable Targets and to maintain the local character is to enforce those development proposals to meet all the parameters of the Design Codes for the area and to implement the “**Design-Led Approach**” and “**Site Capacity**” requirements of the proposed developments, a fundamental objective of the Job Description of “Development Management”.

⁷

<https://democracy.croydon.gov.uk/documents/s34159/Appendix%201%20Proposed%20Submission%20Draft%20of%20Croydon%20Local%20Plan.pdf>

8 Conclusions

8.1 Densities

The assessment of the proposal's **Housing Density** appropriate for this locality **Design Code** has been confirmed to be **37.50units/ha** which is appropriate to an 'Outer Suburban' Setting of **20 to 40 Units/ha**.

8.1.1 The Assessment of the **Residential Density** of **241.67hr/ha** or **220.83bedspaces/ha** is based upon a **conversion factor** of an assumed **National occupancy** of **2.39 occupants per dwelling** as defined by the **ONS and Statista⁸** and therefore may be different in this locality, the local **PTAL** to be **2.675 or 2.1** respectively but again this is an **assumption** but is within acceptable tolerance of the available **PTAL of 2**.

8.1.2 However, using the Office of National Statistic's data and Statista⁹ data to convert the **Design Code Housing Density** to Average National Unit Occupancy, this would place the **Residential Density Design Code** of this proposal into an **Urban Setting** range of **143.4 to 286.8 bedspaces/ha**. The locality is definitely **NOT Urban**.

8.1.3 The **Floor Area Ratio** is **0.466** which is **<0.5** and therefore acceptable in an Outer Suburban Setting or Suburban Setting.

8.2 Accommodation Standards

8.2.1 The London Plan Minimum Space Standards require adequate Built-In Storage space as defined in Table 3.1. Units 1 to 4 do NOT comply to the minimum requirement.

8.3 Access

8.3.1 The Access Drive has inadequate width along the full length, and this even further reduced to less than the 3.7m SPD2 recommendation at the narrowest point to 3.45m. - a clear 0.25m below the minimum 3.7m stated if the upgrade of the drive is kerbed.

8.3.2 In addition, there is no space available for a pedestrian footpath or passing bay safety area in the event of pedestrians or wheelchair user and vehicle simultaneously using the access driveway. These issues should be seriously considered prior to a determination.

8.3.3 The access to the site from Firsby Avenue for Refuse and emergency vehicles would require a full road width at the entrance to obtain a necessary angle of entrance. This would require parking restrictions either side of the entrance and both sides of Firsby Avenue, to allow the unrestricted manoeuvre.

8.3.4 As it seems necessary for the Refuse Vehicle to access the Site further than 25m, it will be necessary for the vehicle to exit in a forward gear (cannot reverse greater than 25m). Therefore, a turning head is necessary which would allow the Refuse vehicles adequate manoeuvrability. Swept path diagrams for both Fire Tenders and Refuse Vehicles should be provided for both "T" and "Y" turning heads to prove acceptability of turning of such vehicles.

⁸ <https://www.statista.com/statistics/295551/average-household-size-in-the-uk/>

⁹ <https://www.statista.com/statistics/295551/average-household-size-in-the-uk/>

- 8.3.5 Confirmation of Building Standards for the Access roads of adequacy with drainage, Kerbing and dropped Kerbs for existing properties in Verdayne Avenue rear gardens and garages should be provided.

8.4 SPD2 Suburban Design Guide

- 8.4.1 The **Croydon Local Plan and SPD2 Suburban Design Guide** (for Residential Developments), is **deficient in policy requirements** and specification for **access to backland developments** in that it **fails to adequately specify**:

- a) The maximum length of an access drive without a 'footpath' for the safe passage of Pedestrians, Children, Pushchair and Wheelchair users.
- b) The Maximum length of an access drive (without a footpath) and without a pedestrian 'Passing Buffer' or safe space for Children, Pushchairs and wheelchair users in the event of the access and exit simultaneously with vehicles.
- c) The maximum length of Access Drive without vehicle Passing Bays or distance between vehicle Passing Bays.
- d) The maximum length without standard kerbing (both sides).
- e) The minimum width (kerb to kerb) if kerbed the length of the access drive.
- f) The Specification (or Standards required) of the road structure if Refuse Vehicles need to traverse any distance into the access drive if the Bin Pull distance from the furthest dwelling is greater than 20metres.
- g) The need for "swept path" illustrations of the Vehicle types that need access to and from the Driveway from the Serving Road/street ingress and egress in a forward gear.
- h) The "swept path" illustrations to prove capability of all vehicles which require to enter and exit in a forward gear by use of an on-site Turning Head. All vehicles include Refuse and emergency vehicles including Fire Appliances.
- i) Speed restrictions, speed bumps at each end of the narrow section of the access driveway to ensure the speed of vehicles is reduced for safety.

- 8.4.2 The access drive is therefore unsafe without a footpath of sufficient width to provide safe passing passage for pedestrians and Wheelchair users when confronted by oncoming and rear coming vehicles whilst entering or leaving the proposed development. The proposed development has unsafe access for both residents and visitors and as there is insufficient capacity which could not be resolved by conditions, the application should therefore be refused.

8.6 Land Ownership and Boundary Issues

- 8.6.1 The applicant has acquired the land between the rear gardens of properties in Verdayne Avenue and the rear access driveway from Firsby Avenue. This could result in the loss of unfettered access to and from the rear gardens and garages of those properties in situ since the properties were built, probably in the 1930s 1940s, and could be considered a "ransom strip" in the event of an approval. We therefore challenge this situation.

8.7 Fire Safety

- 8.7.1 Access to the nearest 'Fire Hydrant' should be established and if over 100m a new nearer hydrant should be provided.

8.8 Parking

- 8.8.1 The proposal's parking provision meets the London Plan maximum Residential Parking for Outer London Boroughs at **PTAL 2**.

8.9 Landscaping

- 8.9.1 The trees proposed to be located on the boundary in front of the garages and rear of properties Nos. 52 to 60 Verdayne Avenue require repositioning within the site as they restrict access to the rear gardens and garages of 52 to 60 Verdayne Avenue.

8.10 Targets

- 8.10.1 In evaluating and determining this application, due account should be taken of the excessive proportion of local developments in this part of the Shirley North Ward exceeding by a significant amount, the Housing Targets for the whole of the **Shirley "Place"**.

9 Summary:

- 9.1 The Assessment of the **Residential Density** of **241.67hr/ha** or **220.83bedspaces/ha** is based upon a **conversion factor** of an assumed **National occupancy** of **2.39 occupants per dwelling** as defined by the **ONS and Statista¹⁰** and therefore the occupancy may be different in this locality. The local **PTAL** is based upon this conversion factor to be **2.675 or 2.1** respectively but again this is an **assumption** but is within acceptable tolerance of the available **PTAL of 2**.
- 9.2 However, using the Office of National Statistic's data and Statista¹¹ data to convert the **Design Code Housing Density** to Average **National Unit Occupancy**, would place the **Residential Density Design Code** of this proposal into an **Urban Setting** range of **143.4 to 286.8 bedspaces/ha**. **The locality is definitely NOT Urban**.
- 9.3 We are of the opinion that **clarifications** are required by the **Case Officer** and the **Applicant** with regard to the access drive, '**swept path**' diagrams at the entrance from Firsby Ave., for refuse vehicle and emergency vehicles, and at the "**T**" and "**Y**" Turning Heads especially if the upgraded access requires Kerbing throughout the narrow section of the access driveway.
- 9.4 The pedestrian and wheelchair users' access requires assessment for the safety of these users.
- 9.5 Additionally, details of land ownership of the Access driveway and a statement of future unfettered Access to and from rear gardens in Verdayne Ave properties bordering the proposed site perimeter, requires confirmation prior to a decision being made.

¹⁰ <https://www.statista.com/statistics/295551/average-household-size-in-the-uk/>

¹¹ <https://www.statista.com/statistics/295551/average-household-size-in-the-uk/>

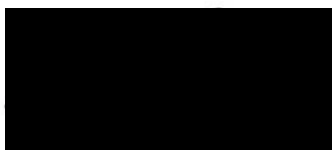


- 9.6 The householders of 50 to 74 Verdayne Avenue must have continued free and unfettered access and use of the Access driveway to their garages and rear gardens via the Access Drive. This access needs to be continued and included as Restrictive Covenants in the Deeds of all the proposed properties if the application is approved.
- 9.7 The access drive is unsafe without a footpath of sufficient width to provide safe passing passage for pedestrians and Wheelchair users when confronted by oncoming and rear coming vehicles whilst entering or leaving the proposed development. The proposed development has unsafe access for both residents and visitors and should therefore be refused.
- 9.8 Resulting from this foregoing assessment and analysis, although concerned of significantly exceeding year on year Targets for the over development of the MORA and Shirley North Ward areas, and the additional significant issues related to the Access Drive, the proposal meets most current adopted Planning Policies but the significant issues relating to Access are not addressed by the Policies which require assessment and evaluation prior to a determination. **We therefore hold a 'Neutral' stance as an assessment as we have no grounds for an objection based on non-compliance to current adopted Planning Policies, but we strongly request that Planning Officers address the additional related issues presented in this submission, which are a significant cause for concern without any possible remedial condition appropriate for their resolution. We therefore recommend a refusal on these grounds.**
- 9.9 Please register this submission as **Monks Orchard Residents' Association (Neutral)** stance on the online Public Register.

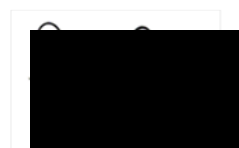
Appendix A Matrix Summary of Planning Policies.

Kind Regards

Derek



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Cllr. Gareth Streeter
Cllr. Richard Chatterjee

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



Appendix A Matrix Summary of Planning Policies.

Description	Proposal	NPPF Design Code	London Plan	Local Plan	Comment
Housing Density	37.5 U/ha	Setting Outer Suburban	No definite Policy	No definite Policy	Compliant to NPPF
Residential Density	241.67 hr/ha	Setting Urban	No definite Policy	No definite Policy	Value assessed by National Occupancy of Units. No Defined Policy
	221.83 bs/ha	Setting Urban	No definite Policy	No definite Policy	
PTAL Required	2.21 (hr/ha)	No Policy	No definite Policy	No definite Policy	Based on TfL
	2.75 (bs/ha)	No Policy	No definite Policy	No definite Policy	Based on TfL
Floor Area Ratio	0.466	<0.5	No definite Policy	No definite Policy	Compliant For Suburban Setting
Open Amenity Space	All meet Policy	Not Defined	Compliant	Compliant	Compliant
Minimum Space	Comply	Not Defined	Comply	Not defined	Compliant
Built-In Storage	Units 1 to 4 Not compliant	Not Defined	Units 1 to 4 Do Not Comply	Not Defined	Partially Compliant
Access Entrance	4.9m	Not Defined	Not Defined	SPD2: 3.6m (min)	Compliant
Minimum width	3.9m	Not Defined	Not Defined	SPD2: 3.7m (min)	Compliant
Minimum width with Kerbs	3.45m	Not Defined	Not Defined	SPD2: 3.7m (min)	Non-Compliant if Kerbstones 125mm thick (Marshalls British Standard)
Footpath and passing buffer for pedestrians	None	Not Defined	Not Defined	Not Defined	No defined length of drive which requires safe passing zone
Parking	9 Bays	Not Defined	Outer London PTAL 2 up to 1 place/dwelling	Up to 1 Place / Dwelling	Compliant
Targets	N/A	N/A	Significantly exceeded	Significantly exceeded	Year on year Target for the 'Shirley Place' significantly exceeded in 'Shirley North Ward'.
Boundary Issue					Civil Matter