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**Monks Orchard
Residents' Association
Planning**

25th January 2022

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| | |
|------------------------|--|
| Reference: | 21/05950/FUL |
| Application Received: | Mon 29 Nov 2021 |
| Application Validated: | Mon 10 Jan 2022 |
| Address: | 44 Orchard Avenue Croydon CR0 7NA |
| Proposal: | Demolition of an existing detached dwelling and construction of a new three storey building comprising 8 apartments with associated private and communal amenity space, refuse and cycle storage |
| Status: | Awaiting decision |
| Consultation Expiry: | Sun 06 Feb 2022 |
| Determination: | Mon 07 Mar 2022 |
| Case Officer: | Jeni Cowan |

Dear Ms Cowan

Please accept this letter as a formal objection to **Application Ref: 21/05950/FUL** for Demolition of an existing detached dwelling and construction of a new three storey building comprising 8 apartments with associated private and communal amenity space, refuse and cycle storage.



Illustration of Proposed re-development at 44 Orchard Avenue



**Proposed re-development illustration at 44 Orchard Avenue
as viewed from the rear garden of Holbrooke Court, 40 Orchard Avenue .**

1 The Proposed Parameters:

| 44 Orchard Avenue | | | | 21/05950/FUL | | | | | | | | | | | |
|------------------------------|-----------|----------|-----------|-----------------|-------------|-----------------------------|-----------------------------|--|--|------------------------|--|-------------------|---------------------|---------------------|---|
| Post Code CR0 7NA Population | | | | 36 | Dwellings | 18 | Residential Density (hr/ha) | | 200.00 <th colspan="2">Floor Area Ratio</th> <td>0.4800</td> <td></td> <th>PTAL 2011</th> <td>2</td> | Floor Area Ratio | | 0.4800 | | PTAL 2011 | 2 |
| Units | Site Area | 1000 | sq.m. | Area (ha) | 1.97 | Residential Density (bs/ha) | | 220.00 <th colspan="2">Post Code Density</th> <td>9.00<th>Units/ha</th><th>PTAL 2021</th><td>2</td></td> | Post Code Density | | 9.00 <th>Units/ha</th> <th>PTAL 2021</th> <td>2</td> | Units/ha | PTAL 2021 | 2 | |
| 8 | Site Area | 0.1 | ha | Density (U/ha) | 9.14 | Housing Density (U/ha) | | 80.00 <th colspan="2">Post Code CR0 7NA</th> <td>1.97<th>ha</th><th>PTAL 2031</th><td>2</td></td> | Post Code CR0 7NA | | 1.97 <th>ha</th> <th>PTAL 2031</th> <td>2</td> | ha | PTAL 2031 | 2 | |
| Dwelling | Type | Bedrooms | Bedspaces | Habitable Rooms | GIA Offered | GIA Required | Built-In Storage Offered | Built-In Storage Required | Amenity Space Offered | Amenity Space Required | Probable Adults | Probable Children | Communal Open Space | Play Space Required | |
| Flat 1 | M4(2) | 1 | 2 | 2 | 50.2 | 50.0 | Not Stated | 1.5 | 14.0 | 6 | 2 | 0 | 67 | 0.00 | |
| Flat 2 | M4(2) | 3 | 4 | 4 | 77.3 | 74.0 | Not Stated | 2.5 | 24.0 | 7 | 2 | 2 | | 20.00 | |
| Flat 3 | M4(3) | 1 | 2 | 2 | 59.5 | 50.0 | Not Stated | 1.5 | 82.0 | 5 | 2 | 0 | | 0.00 | |
| Flat 4 | M4(2) | 1 | 2 | 2 | 50.2 | 50.0 | Not Stated | 1.5 | 5.0 | 5 | 2 | 0 | | 0.00 | |
| Studio 5 | | 1 | 2 | 2 | 38.9 | 37.0 | Not Stated | 1.5 | 5.6 | 0 | 2 | 0 | | 0.00 | |
| Flat 6 | M4(2) | 2 | 4 | 3 | 77.1 | 70.0 | Not Stated | 2.0 | 6.1 | 7 | 2 | 2 | | 20.00 | |
| Flat 7 | M4(2) | 2 | 3 | 3 | 62.5 | 61.0 | Not Stated | 2.0 | 6.3 | 6 | 2 | 1 | | 10.00 | |
| Flat 8 | M4(2) | 2 | 3 | 2 | 64.3 | 61.0 | Not Stated | 2.0 | 7.6 | 6 | 2 | 1 | | 10.00 | |
| Totals | | 13 | 22 | 20 | 480.0 | 453.0 | 0.0 | 14.5 | 150.6 | 42.00 | 16 | 6 | 67 | 60 | |

2 General observations:

2.1 Croydon Plan Policy SP1.2 states:

SP1.2 "The Council will require ALL new developments in the Borough to contribute to enhancing a sense of Place and improving the character of the area, whilst acknowledging the need for growth".

2.2 Croydon Plan Policy DM10.7 d) states:

DM10.7 d) "To ensure the Design of roof-form positively contributes to the character of the wider and local area; proposals should ensure the design is sympathetic with its local context."

2.3 The illustrations above do not reflect the Design and Access Statement quote at Item 3.5 - Materials which states:

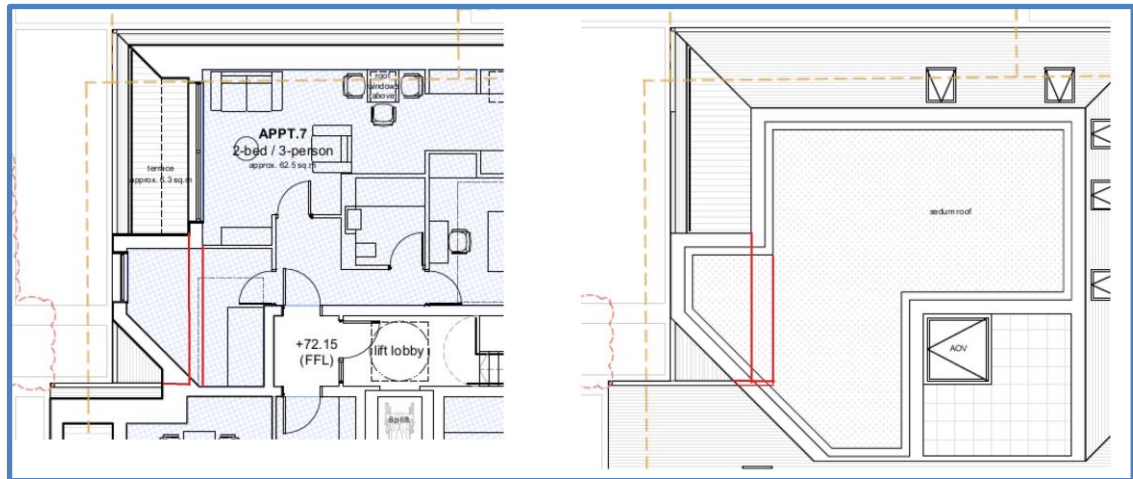
"Contrasting darker Tiles are proposed to distinguish between the wall hung and those used on the roof to help break-up and separate into three layers ..."



This requirement needs to be ensured and emphasised in conditions if the Case Officer is minded to approve the proposal as the illustration indicates a continuous colour material of brickwork and tiles from ground level elevation to roof-top which does NOT respect the local character whatsoever.

2.4 The Roof-Form fronting Orchard Avenue

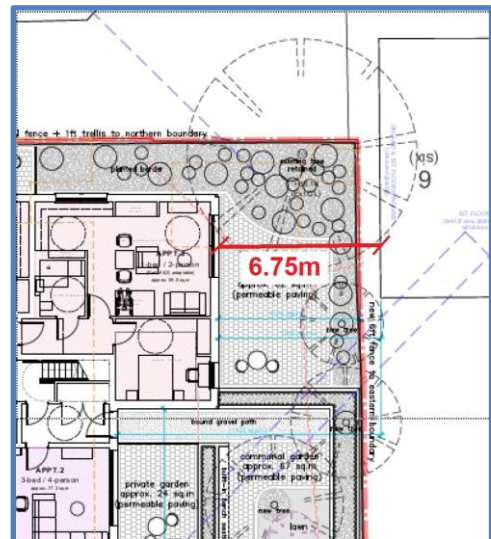
The Roof form fronting Orchard Avenue looks distinctly messy in order to squeeze in an extra bed space for Flat 7. This roof form is inappropriate and Flat 7 accommodation should be reconsidered as proposed below.



The modification (in Red) would improve the Roof Form but would result in the loss of a single Bed Room.

2.5 Separation:

The separation distance between **No 6 Potters Close** as measured from the supplied plans, is only **≈6.75m**. It is not known if **6 Potters Close** has a facing window opposite the Apartment 3 Lounge. However, this proximity with **No. 6 Potters Close** is unsatisfactory with regard to overlooking and invasion of privacy to the occupants of **6 Potters Close** and is considered inappropriate for the **Design Code** relationships for spacing, in this locality. This reduced separation does **NOT** respect the existing separation of **≈12m** from the rear elevation of **44 Orchard Avenue** to the flank elevation of **6 Potters Close**.



2.6 Conflicting information:

The Planning Statement at **para 5.4** lists **Flat 1** having **17m²** of Outside Private Amenity space whereas the Ground floor plans show approximately **14m²** Private Amenity Space.

2.7 Minimum Space Standards:

- 2.7.1 The provided floor plans fail to indicate any **In-Build Storage** capacity as required of the **London Plan Policy Table 3.1**. This is unacceptable with modern living accommodation requirements for normal storage of living clutter and required storage of important items.
- 2.7.2 **Flat 6** has inadequate amenity space at **6.1m²** when there are **4** occupants within **Flat 6** which requires **7m²** Private Amenity Space.
- 2.7.3 The **London Plan para 3.6.2** states that these are “**Minimums**” which applicants are encouraged to exceed. Therefore, application proposals which do not meet at least the minimum should be refused.

3 London Plan Policy D3 Design

3.1 Planning Statement

- 3.1.1 The applicant's Planning Statement at paragraph **6.20** states:

“Policy D3 (Optimising Site Capacity Through the Design-led Approach) states that all development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth, and existing and planned supporting infrastructure capacity.”

But the proposal does **NOT** address these **Policy requirements**. There is no implementation of a **Design-Led Approach** to assess “**Site Capacity**” appropriate for the local **Setting** or the assessment of a **Local Design Code** to establish the appropriate **Densities** supported by the available infrastructure for sustainable developments.

3.1.2 London Plan Policy D3 States:

“A ‘All’ development must make the best use of land by following a Design-Led Approach that optimises the “capacity” of sites, including site allocations. Optimising ‘site capacity’ means ensuring that development is of the most appropriate form and land use **for the site. The **design-led approach** requires **consideration** of design options to determine the most appropriate form of development that responds to a **site's** context and ‘**capacity for growth**’, and existing and planned supporting ‘**infrastructure capacity**’ (as set out in **Policy D2 Infrastructure requirements for sustainable densities** ¹), and that best delivers the requirements set out in **Part D**.”**

Policy D3 Para 3.3.2

*“A **design-led approach** to optimising **site capacity** should be based on an “**evaluation**” ² of the **site's attributes**, its surrounding context and its **capacity for growth** to determine the appropriate form of development for that site.”*

¹ https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf

² Definition of “**evaluation**”: The making of a judgement about the **amount, number, or value** of something.

Policy D3 Para 3.3.4

*“Designating appropriate development capacities through site allocations enables boroughs to proactively **optimise the capacity** of strategic sites through a consultative **design-led** approach that allows for meaningful engagement and collaboration with **local communities, organisations and businesses.**”*

- 3.1.3 The applicant's proposal does **NOT** provide any evidence of meeting **London Plan Policy D3** with respect to the **“Design-Led Approach”** or meeting or optimising the development within the **“Site Capacity”** at the local **“Setting”**. This should have been a topic discussed during the **Pre-Application Meeting** as the new London Plan was published in **March 2021**. **None of these London Plan Policy D3 requirements have been considered or met.**

3.2 London Plan Policy H2

3.2.1 Small Sites para 4.2.5 States:

*“The small sites target represents a **small amount** of the potential for **intensification** in existing **residential areas**, particularly in **Outer London**, therefore, they should be treated as minimums. To proactively increase housing provision on small sites through ‘**incremental**’ development, Boroughs are encouraged to **prepare area-wide housing Design Codes**, in particular, for the following forms of development: **Residential Conversions, Redevelopments, extensions of houses and/or ancillary residential buildings.**”*

- 3.2.2 The issue here is that there is **‘NO definition’** of the magnitude of **“incremental”** or **“Intensification”** but this should be defined in the **‘Design Code’** for the **Site** or **Locality**, taking account of its **Setting** and **supporting infrastructure**.
- 3.2.3 There is **NO** mention of the **London Plan Policy D3 or H2 Para 4.2.5** in either the Current adopted or the **Draft Revised Croydon Plan** and there is **NO** mention of **“Design Codes”** or their parameters or a **“Design-Led Approach”** in either the current adopted **Croydon Local Plan** or the **Draft Revised Local Plan³**.
- 3.2.4 This, also, should have been a topic discussed during the **Pre-Application Meeting** as the new London Plan was published in **March 2021**. Therefore, it would be inappropriate for the LPA Development Management to **ignore** or **disregard** these and the higher hierarchical Levels of **Planning Policy**. **Clear and precise ‘justification’ should be provided if any of these policies are disregarded during assessment and prior to determination of this proposal.**

4 Croydon Local Plan (Current & Revised)

4.1 Croydon Local Plan (2018) ‘Growth’ Policies

- 4.1.1 The current **Croydon Local Plan (2018) ‘Growth’** Policies, as defined in **Table 6.4**, ‘purports’ to describe **“Growth”** by either **“Redevelopment”** or **“Evolution”** by **“Regeneration”**, but gives no definition of the acceptable magnitude of **‘growth’** in

³

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

terms of ‘**Site Capacity**’ for the ‘**Setting**’, ‘**Local and future infrastructure**’ or ‘**Public Transport Accessibility**’ 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. This proposal is 4 storeys or 3 storeys plus accommodation in the roof space.

- 4.1.2 The current Policy Fails to meet the guidance required in **NPPF (2019-21) Section 3. Plan-making** and specifically **NPPF para 16 d)** or **Para 35**, a) Positively prepared, b) Justified, c) Effective and d) Consistent with National Policy or, more importantly, the Statutory requirement to ensure ‘**Sustainable Developments**’. In fact, the Policy is quite “*meaningless*” and “*nugatory*” but subject to the “*professional*” prejudicial judgment of Case Officers without any objective justification.
- 4.1.3 However, it is understood that the **Draft Revised Croydon Local Plan**⁴ (Cabinet approved on 6th December and at Full Council on 13th January 2022) omits **Table 6.4** and replaces it with a modified version of **Table 6.5** which is just a tick box guide to evolution (*i.e., again No defining parameters*). **Paragraph 6.62** has been modified to include a “**Moderate Intensification**” category and at **6.56a** to include a “**Gentle densification**” category, but again, there is no definition for what is meant by “**Moderate**” or “**Gentle**”. These are abstract objectives, **NOT** policies.
- 4.1.4 The Draft Revised Croydon Local Plan at **Table 1.1** Croydon’s Planning Policy Framework indicates **The London Plan** has been an input to the production of the **Revised Croydon Plan**. However, the **Draft Revised Croydon Plan** does **NOT** reference **London Plan Policies of ‘Chapter 3 - Design’** other than **D9** (Tall Buildings) and **D13** (Impact of Change). Therefore, the *main thrust* of **London Plan’s “Design-Led Approach”, “Site Capacity limitations”** and requirement for definition of “**Design Codes**” for **Residential localities** has been **completely disregarded**.
- 4.1.5 There is **NO definition** of any limiting parameters for “**Incremental Intensification**” in the Adopted **London Plan** or the adopted **Croydon Local Plan**. There is **NO definition** of any limiting parameters for “**Moderate Intensification**” in the Adopted **London Plan** or the adopted **Croydon Local Plan** or the revised draft **Local Plan**. There is **NO definition** of any limiting parameters for “**Gentle Intensification**” in the Adopted **London Plan** or the adopted **Croydon Local Plan** or the revised draft **Local Plan**.
- 4.1.6 In summary these designations are meaningless. *In fact, there is NO meaningful management Policy of “Growth”, a fundamental requirement of the job description for Development Management.*

- 4.2 The new London Plan Policy H2 at para 4.2.4 states:

“4.2.4 Incremental intensification of existing residential areas within PTALs 3-6 or within 800m distance of a station⁵ or town centre boundary⁶...”

⁴

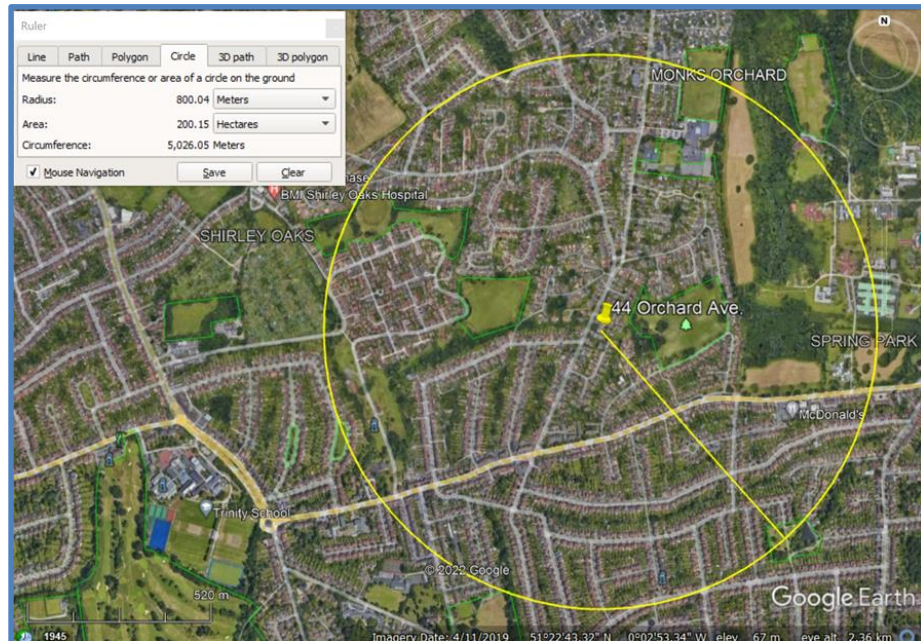
<https://democracy.croydon.gov.uk/documents/s34159/Appendix%201%20Proposed%20Submission%20Draft%20of%20Croydon%20Local%20Plan.pdf>

⁵ Tube, rail, DLR or tram station.

⁶ District, major, metropolitan and international town centres.



- 4.2.1 **44 Orchard Avenue has PTAL of 2 and is greater than 800m from a Tram/Train Station or District Centre and as such is inappropriate for incremental intensification.**



Google Image of 800m radius from 44 Orchard Avenue showing that it is over 800m from Tram/Train Station and District Centre

- 4.2.2 44 Orchard Avenue has a PTAL of 2 forecast to remain at 2 until at least 2031. Therefore, as the location is greater than 800m from a Tram/ Train Station or District Centre, the site is inappropriate for “incremental” intensification.
- 4.2.3 If the case officer is minded to recommend approval, we request detailed ‘justification’ for allowing the proposed ‘intensification’ in terms of Housing and Residential Density for this proposal at this Setting and PTAL which is in contradiction to the London Plan Policy H2 at para 4.2.4 and the London Plan Policy D3 and “Design Code” and the Department for Levelling Up, Housing and Communities “National Model Design Code and Guidance”.

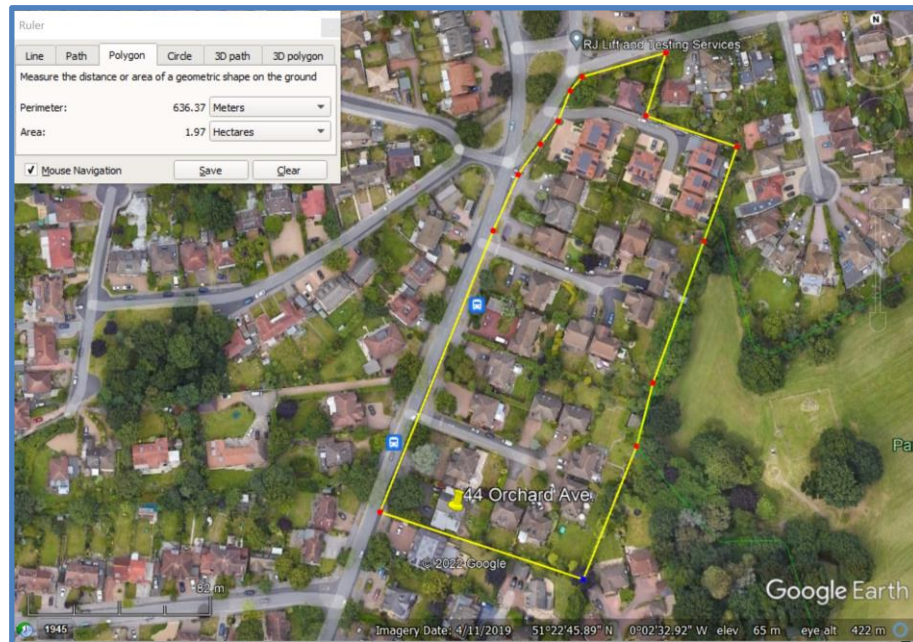
5 Site Capacity (Assessment of Design Codes)

5.1 NPPF

5.1.1 NPPF Para 129 States:

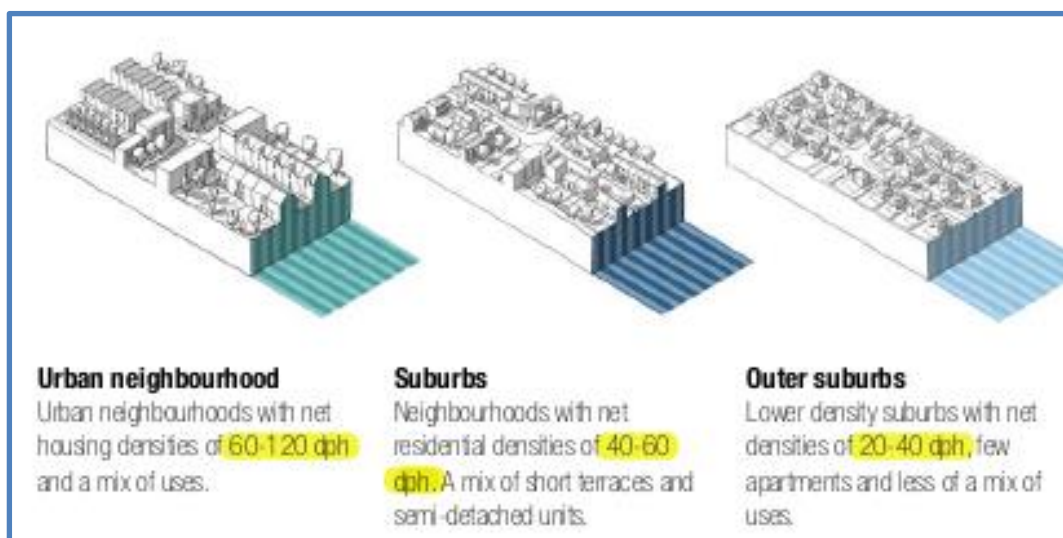
Design guides and codes can be prepared at an area-wide, neighbourhood or site-specific scale, and to carry weight in decision-making should be produced either as part of a plan or as supplementary planning documents. Landowners and developers may contribute to these exercises but may also choose to prepare design codes in support of a planning application for sites they wish to develop. Whoever prepares them, all guides and codes should be based on effective community engagement and reflect local aspirations for the development of their area, taking into account the guidance contained in the National Design Guide and the National Model Design Code. **These national documents should be used to guide decisions on applications in the absence of locally produced design guides or design codes.**

- 5.1.2 In order to evaluate the local Design Code a range of parameters need to be assessed based upon the Local Character. The Post Code approximate Area is defined from Google Earth and Post Code Boundaries from searches on the internet⁷. The number of dwellings are obtained from The Valuation Office Agency⁸



CRO 7NA Post Code approximate Area at 1.97hectares

- 5.1.3 The Post Code Area **CR0 7NA** has a current **population** of **36** Housed in **18 Dwellings** in an approximate Area of **≈1.97hectare** which equates to a **Housing Density** of **9.14Units/ha** and a **Residential Density** of **18.27 persons/ha**. Which places the Post Code in an 'Outer Suburban' Design Code Setting.



The National Design Code Housing Densities appropriate for local Settings as published in the National Model Design Code Part 1.

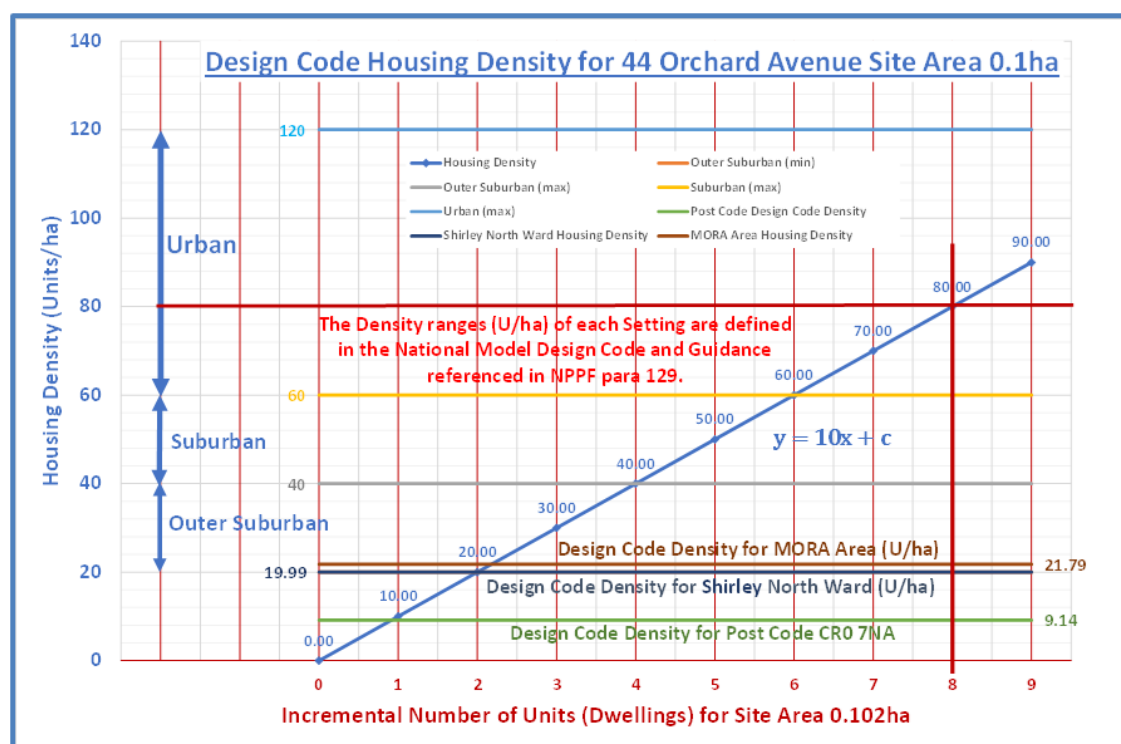
⁷ <https://www.postcodearea.co.uk/>

⁸ <https://www.gov.uk/government/organisations/valuation-office-agency>

- 5.1.4 **National Model Design Code Part 1 page 14** provides guidance on **Housing Densities for local “Settings”**.
- 5.1.5 As the Croydon Local Plan has **NO** guidance on the local **Design Codes** (see NPPF Para 129 and para 5.1.1 above) **“The National Model Design Code & Guidance should be used in the absence of locally produced design guides or Design Codes”**.
- 5.1.6 Based on the guidance in the National Design Code Part 1 we have assessed the Design Code Densities for the following areas:

| Design Code Area | Area (ha) | Population | Dwellings | Housing Density (Units/ha) | Residential Density bs/ha | Setting (as defined by the National Model Design Code) |
|--------------------------------------|---|------------|-----------|----------------------------|---------------------------|---|
| Shirley North Ward | 327.9 | 15666 | 6555 | 19.99 | 47.78 | < Outer Suburban |
| Shirley South Ward | 387.3 | 14147 | 5919 | 15.28 | 36.53 | < Outer Suburban |
| Shirley | 715.2 | 29814 | 12474 | 17.44 | 41.69 | < Outer Suburban |
| Post Code CR0 7NA | 1.97 | 36 | 18 | 9.14 | 18.27 | < Outer Suburban |
| MORA Area | 178.26 | 9283 | 3884 | 21.79 | 52.07 | Outer Suburban |
| Average for the Locality | 322.13 | 13789 | 5770 | 16.73 | 42.81 | < Outer Suburban |
| 44 Orchard Avenue (Proposal) | 0.1 | 22 | 8 | 80.00 | 220.00 | Urban |
| Percentage of proposal above average | (This cannot be considered a moderate or gentle incremental increase) | | | 378.23% | 413.94% | This clearly is NOT Moderate or Gentle Intensification! |

Determination of Local Area Design Code Settings from evaluated data



Design Code Analysis for the various local areas shows all < or within “Outer Suburban” Settings whereas the proposal would require an Urban Setting.

- 5.1.7 The graphical illustration above plots the **Design Code Housing Density (Units/ha)** over the range **0 to 9 dwellings** for the **Site Area (0.1ha)** of **44 Orchard Avenue**, against various examples of **Design Codes** of the local Areas to show that the prevailing



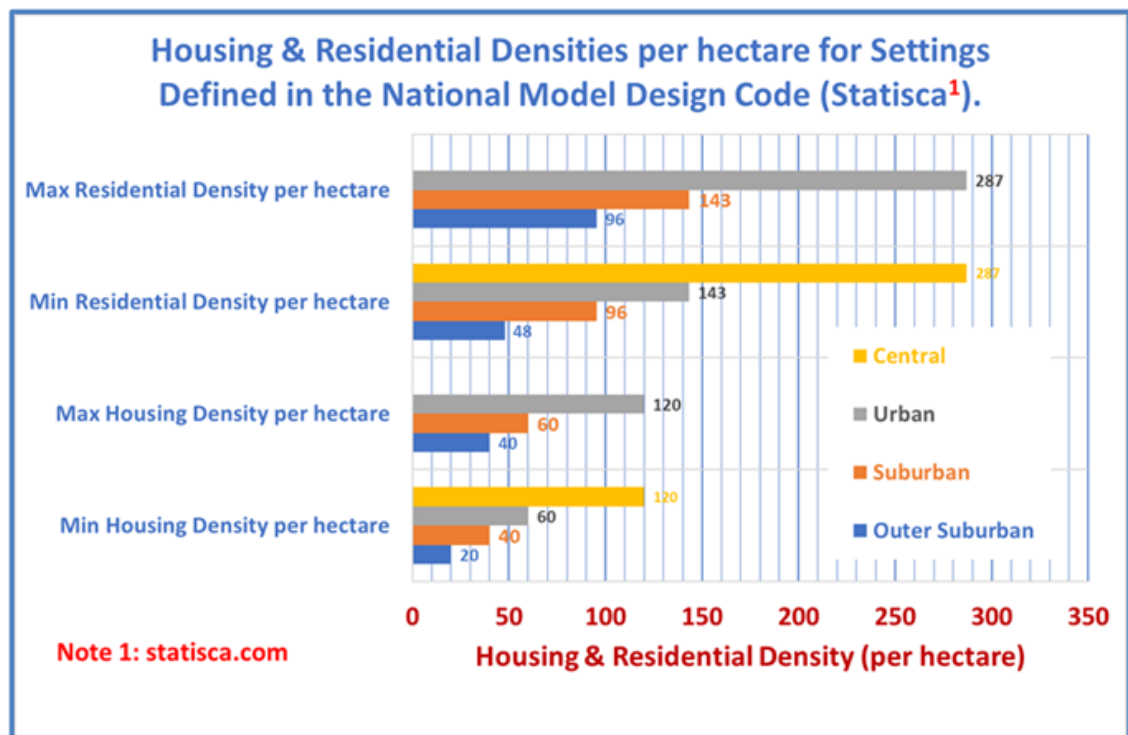
Design Code 'Setting' for the locality is **well within** the prescribed parameters for "**Outer Suburban**" (or Outer London Suburban) Setting.

5.1.8 **Shirley is definitely NOT Urban** as defined in the current adopted **Local Plan**, the Shirley "**Place**". At 80 Units/ha appropriate for an "**Urban**" Setting, this proposal is clearly an over development for the locality average Design Code '**Outer Suburban**' Setting.

5.1.9 The assessment therefore is that the proposed development significantly **exceeds** the appropriate **Housing Density** for the **Local 'Setting'** which by evaluation of the local areas of **Shirley North** and **Shirley South Wards**, **All Shirley**, the **Local Post Code** for **44 Orchard Avenue** and the **MORA Area**, **ALL** show that the **Local Setting** is clearly **Outer Suburban** in the range of 20 to 40 Units/ha and **NOT Urban** which is in the range **60 to 120units/ha** as defined by the **National Model Design Code & Guidance**

5.2 Residential Density Design Code

5.2.1 It is people who require supporting infrastructure, **NOT** Dwellings, so we need to establish equivalent **Residential Densities** ranges for the '**Settings**'. This can be achieved using the **Office of National Statistic's** data and **Statista**⁹ 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 Graphical illustration.

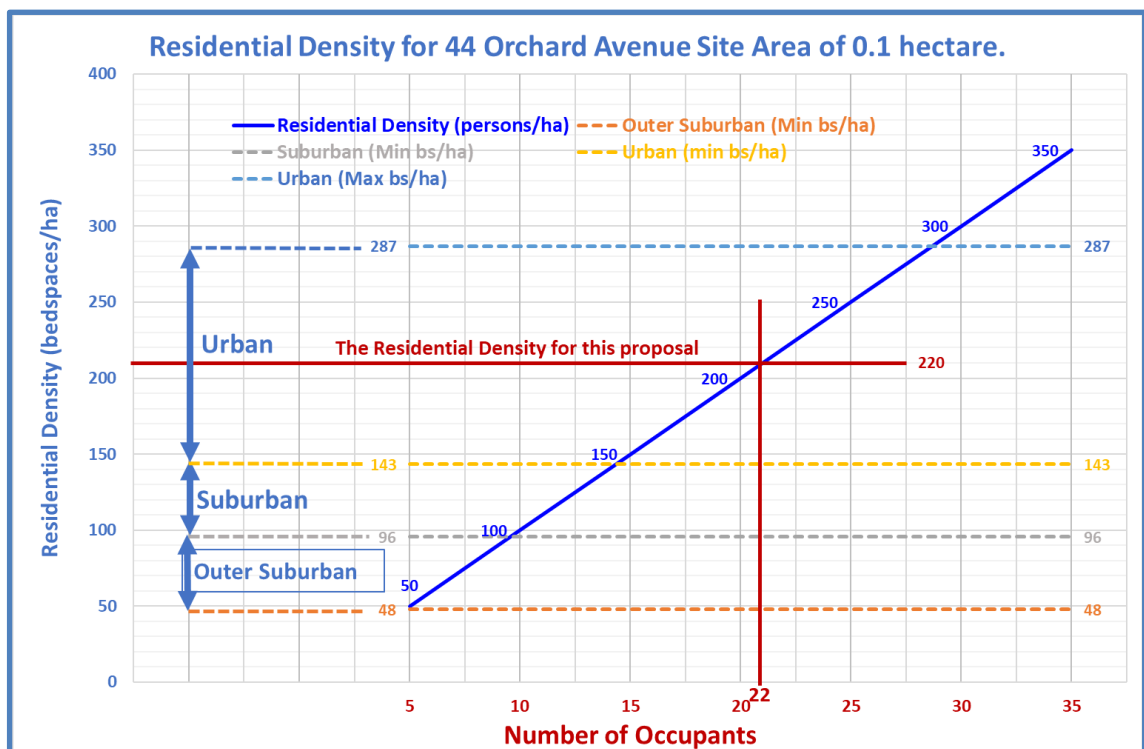


Conversion of Housing Density ranges per Setting to Residential Densities

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

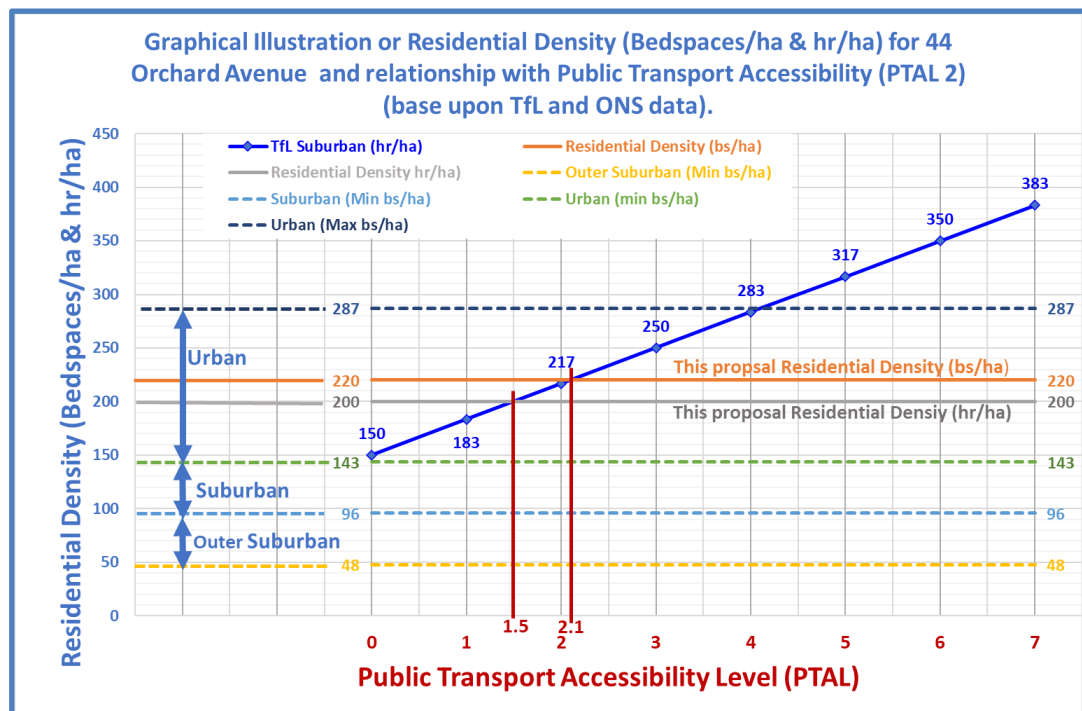


- 5.2.2 Using this data, and TfL Connectivity data, we can convert Housing Density to an approximate Residential Density (as we do not have equivalent data for dwellings occupancy in Croydon). However, we can plot and illustrate the required **Settings** for this proposed **Residential Density** in bedspaces/hectare which gives an estimated relationship between **Residential Density** and **PTAL** for each of the 'Settings' based upon Nation Statistics.
- 5.2.3 If the Case Officer disagrees with the above evaluation and assessment, we would appreciate the 'recommendation report' gives **full justification** why the guidance given in the **National Model Design Code** does **NOT** apply to this proposal and what would be the **Croydon LPA's** equivalent assessment of the local "Setting" and "Housing Density" appropriate for this "Site Capacity" and by what methodology.



Residential Densities for Site Capacity for 44 Orchard Avenue relating Number of occupants and the equivalent National Model Design Code Settings.

- 5.2.4 The evaluation of this proposal places 44 Orchard Avenue in an Urban Setting when all other assessment of the locality is either <Outer Suburban or Outer Suburban Settings with 8 dwellings at Housing Density of 80Units/ha clearly within the mid-range of an 'Urban' 'Setting' whereas the locality by the various local Area evaluations is well within or even below the Outer-Suburban Design Code 'Setting'. Additionally, at a Residential Density of 220 Bedspaces/ha or 200 hr/ha Residential Density confirms the capacity requires an 'Urban' Setting whereas the actual Setting is 'Outer Suburban'.



Graphical Illustration of Residential Density (Bedspaces/ha & hr/ha) in relation to Public Transport Accessibility Level (PTA)

- 5.2.5 The above analysis also **confirms** the **Public Transport Accessibility (PTAL)** for the **Residential Density** is acceptable within the capacity of **PTAL 2**.

6 Communal Open Space & Play Space for Children

- 6.1 The proposed development would probably accommodate up to 6 children which would require **60m²** Play Space as required by the London Plan and the revised Croydon Local Plan (currently published for consultation).

- 6.2 The **67m²** Communal Open Space may be a shared resource for both adults and children but there are no Children's playing aids such as swings or slides etc. which would preclude this provision.

| Dwelling | Probable Children | Play Space Required | London Plan Play Space | Play Space Deficient |
|---------------|-------------------|---------------------|------------------------|----------------------|
| Flat 1 | 0 | 0 | 0 | 0 |
| Flat 2 | 2 | 20 | 20 | 0 |
| Flat 3 | 0 | 0 | 0 | 0 |
| Flat 4 | 0 | 0 | 0 | 0 |
| Studio 5 | 0 | 0 | 0 | 0 |
| Flat 6 | 2 | 20 | 20 | 0 |
| Flat 7 | 1 | 10 | 10 | 0 |
| Flat 8 | 1 | 10 | 10 | 0 |
| Totals | 6 | 60 | 60 | 0 |

- 6.3 **Requirements for Play Space for Children**

- 6.3.1 London Plan Policy

“B Development proposals for schemes that are likely to be used by children and young people should:

- 1) increase opportunities for play and informal recreation and enable children and young people to be independently mobile*

- 2) *for residential developments, incorporate good-quality, accessible play provision for all ages. At least **10 square metres** of play space should be provided per child that:*
- a) provides a stimulating environment*
 - b) can be accessed safely from the street by children and young people independently*
 - c) forms an integral part of the surrounding neighbourhood*
 - d) incorporates trees and/or other forms of greenery*
 - e) is overlooked to enable passive surveillance*
 - f) is not segregated by tenure ...”*

7 Parking

7.1 Croydon Local Plan SP8 Transport and Communication Indicates:

The **Draft Revised Croydon Local Plan** proposes at **DM30 - Car and cycle parking in new developments:**

7.2 The Revised Draft Croydon Local Plan calculate Parking spaces on the spaces per Unit and for Areas with no controlled Parking, on the basis of number of Bedrooms of those Units at various PTAs

| Public Transport Accessibility Level | Minor non-residential developments | Major non-residential | 1 and 2-bedroom homes in an area with a Controlled Parking Zone | 3 or more bedroom homes in an area with a Controlled Parking Zone | All homes in an area with no Controlled Parking Zone |
|--------------------------------------|------------------------------------|-----------------------|---|--|--|
| 2 | As per London Plan | As per London Plan | <ul style="list-style-type: none"> Up to 0.5 spaces per unit In areas with parking stress levels above 85% all rights for parking permits will be removed | <ul style="list-style-type: none"> In areas more than 800m from a train station or tram stop 1 space per unit must be provided In areas within 800m of a train station or tram stop 0.6 spaces per unit must be provided In areas with parking stress levels above 85% all rights for parking permits will be removed | <ul style="list-style-type: none"> 0.75 space per unit for 1 and 2-bedroom homes 1-2 spaces per unit for homes with 3 or more bedrooms subject to parking stress surveys |

Table 10.1 Revised Draft Local Plan Policy Car parking in new developments.

7.3 The **London Plan Policy T6 on Residential Parking** quotes at **Table 10.3** for **Outer London** at **PTAL 0** localities.

| Location | Number of beds | Maximum parking provision* |
|-------------------------|----------------|--------------------------------|
| Outer London PTAL 2 – 3 | 1 – 2 | Up to 0.75 spaces per dwelling |
| Outer London PTAL 2 – 3 | 3+ | Up to 1 space per dwelling |

London Plan Table 10.3 – Maximum residential parking standards.

7.4 Analysis of Residential Parking provision:

7.4.1 The analysis shows that for new developments in areas without controlled parking Zones and at **PTAL 2**, the Croydon Plan would require a limit 6.75 **spaces** for the Revised draft **Croydon Local Plan Policy DM30 Table 10.1** and **7 spaces** for the adopted **London Plan Policy T6.1 Table 10.3** when only **5 spaces** are provided.

| Parking Standards | | | | |
|--|-----------|-----------|--|--|
| Dwelling | Bedrooms | Bedspaces | Residential Parking London Plan PTAL 0 - 1 | Residential Parking Revised Local Plan ¹ (Table 10.1) |
| Flat 1 | 1 | 2 | 0.75 | 0.75 |
| Flat 2 | 3 | 4 | 1 | 1.5 |
| Flat 3 | 1 | 2 | 0.75 | 0.75 |
| Flat 4 | 1 | 2 | 0.75 | 0.75 |
| Studio 5 | 1 | 2 | 0.75 | 0.75 |
| Flat 6 | 2 | 4 | 1 | 0.75 |
| Flat 7 | 2 | 3 | 1 | 0.75 |
| Flat 8 | 2 | 3 | 1 | 0.75 |
| Totals | 13 | 22 | 7.00 | 6.75 |
| Parking Provided | | | 5.00 | 5.00 |
| Probable overspill | | | 2.00 | 1.75 |
| Percentage under provision | | | 40.00% | 35.00% |
| 1 All Homes in an area with no controlled Parking Zone (Table 10.1) | | | | |

7.4.2 This is a **35% deficiency** for the Revised Draft Croydon Plan and a **40% deficiency** for the **London Plan Policy** which means a likely overspill of **1.75 (≈2)** for the Croydon Plan and **2** for the London Plan. This overspill would likely park in **Orchard Avenue**, a link road not sufficiently wide enough for both way traffic passing a parked vehicle, with high traffic density linking the **A232** with the **A222** and a **Bus Route**.

8 Summary & Conclusions

- 8.1 The analysis and assessment is that the accommodation is squeezed into the site as illustrated by the need to modify the roof-form to accommodate an additional single bedroom. The lack of In-Built Storage also indicates over development of the Site Capacity and the limited Car Parking Spaces.
- 8.2 The inappropriate 6.75m separation between the existing dwelling at 6 Potters Close is a further example of over development exceeding the "Site Capacity" at this setting.
- 8.3 There is a conflicting reference to the Private Amenity Space afforded to Flat 3 and non-compliance to minimum Space Standards for Flat 6 Amenity and deficiency of In-Built Storage for ALL Flats.
- 8.4 The applicant professes to acknowledge a requirement to meet London Plan Policy D3 in the Design and Access and Planning Statement regarding the "Design Led Approach", "Design Codes" and to Optimise "Site Capacity" but fails to deliver on any of these Policies. NO account has been taken on the main thrust of the New London Plan since the omission of the density Matrix, to assess the 'Site Capacity' and the replacement Policies requiring a Design-Led approach
- 8.5 There is inadequate Children's "Play Space" with no children's play facilities provided in the very limited communal open space which is further evidence of over development inappropriate for the "Site Capacity" at the Local "Setting".
- 8.6 Analysis of both the London Plan and the Revised Croydon Local Plan Residential Parking at PTAL 2 indicates under provision of 35% to 40% which would result in the deficiency in parking to overspill on to on-street parking in Orchard Avenue or Firsby Avenue.



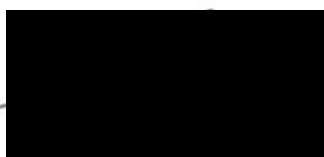
- 8.7 The NPPF at Para 129 gives clear direction that in the absence of Local Design Codes and guidance, the National Model Design Code and Guidance should be used for assessing proposals.
- 8.8 Further, NO account has been taken of the Department for Levelling Up, Communities and Housing (LUCH) published National Model Design Codes and Guidance for local settings as defined and described above. **Clear and precise justification should be provided if these policies are disregarded.**
- 8.9 After a detailed assessment of Housing Densities for the Shirley North Ward, the Shirley South Ward, the combined all of Shirley, the MORA Area and the Post Code of the locality for the redevelopment, all showing a local "Setting" of or below "Outer Suburban" Housing Density in units/hectare, we would expect the Case Officer to respond to this analysis and if these Policies are disregarded, would respectfully request reasons. In addition, if these Policies are not considered appropriate, we expect realistic detailed justification why and if alternative parameters were considered appropriate for determining the Site Capacity, we would respectfully request they be defined with justifiable criteria and reasoning.

9 Recommendation

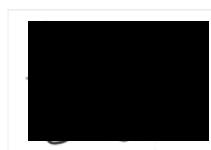
- 9.1 Taking all the foregoing assessments and evidence when considered in total, the whole assessment would combine to provide sufficient proof of overdevelopment for the Setting and the Site, which exceeds Site Capacity for 0.102ha at this Setting and locality.
- 9.2 The assessment is therefore that this proposal should be refused with the objective of the applicant re-applying with a more appropriate and suitable proposal.

Kind regards

Derek



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Croydon Central
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Shirley North Ward
Shirley North Ward

Bcc:

MORA Executive Committee, Local affected Residents & Interested Parties