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**Monks Orchard Residents'
Association
Planning**

16th May 2022

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Reference:	21/06036/FUL
Amended Drawings:	26 th April 2022
Address:	Land R/O Firsby Avenue & Verdayne Avenue, CR0 8TL
Proposal:	Erection of eight semi-detached houses, together with associated access, car parking and landscaping.
Status:	Awaiting decision
Consultation Expiry Date:	20 May 2022
Case Officer:	Georgina Betts

ADDENDUM

Dear Ms Georgina Betts

Please accept this **Addendum** to our comment letter of **29th December 2021** as a formal response to the proposed **Amended Drawings** issued on **26th April 2022** and the extension of consultation to **20th May 2022** for **Application Ref: 21/06036/FUL (as amended)** for Erection of **eight** semi-detached houses, together with associated access, car parking and landscaping at **Land R/O Firsby Avenue and Verdayne Avenue**.

We appreciate the opportunity to comment on this new offered **revised information** and have made **amendments** to our original submission where appropriate.

Additionally, we have made a number of comments relating to our submission of **29th December 2021** which have **NOT** been addressed in the revised documentation. Please consider the content and issues raised in **both our original submission of 29th December 2021** and this **Addendum** prior to a recommendation to committee or a determination.

The revised documentation included:

- 1) a revised site boundary (the red line);
- 2) the reduction in units from 9 to 8 houses;
- 3) the incorporation of wooded buffer to the east of the site;
- 4) amendments to the extent of the parking stress survey area;
- 5) the incorporation of cycle parking, the increase in the width of the access road and the provision of granite setts to the entrance of the site.

1 A Revised Site Boundary (The Red Line)

- 1.1 The revised boundary shown by the RED line on the amended Site Plan indicates the entire site is now included in the proposal, including the Access Lane. The documentation implies complete ownership. However, it is NOT clear whether shared access between the applicant and occupants of the dwellings with rear access from their rear gardens of **Verdayne Avenue** remain **legally 'Accessible'** via the narrow service road onto **Firsby Avenue**, or to the access strip outside (North) of the RED line boundary providing access to rear gardens in **Firsby Avenue**. **This still needs to be clarified.**
- 1.2 There are a number of garages in these listed rear gardens that are accessed from the service road.
- 1.3 We note that the Pre-Application meeting recorded a **'requirement'** that the Applicant would:
- "need to confirm that the service road is in your ownership or that you have the necessary rights to carry out the required improvements and maintain them. We question whether this is feasible, and therefore the principle of development here."***
- 1.4 Para 2.1 – Site Location (page 6) of the Design and Access Statement indicates the Site Area is separate from the Access Lane. We see no new evidence or proof that the applicant has gained "ownership" of the **entire site, including the access Lane** now marked in Red on the amended site plan and no statement or confirmation of legal compliance to this **Pre-Application** requirement. There is no change or reissue of the Application Form Item 38 – Ownership Certificates indicating ownership of the Access Lane.



**Design and Access Illustration
of Site Boundary**



New proposed Boundary Area

- 1.4.1 This is a contentious issue of the proposal for Residents in Verdayne Avenue and Firsby Avenue. The current Access Drive **users** are 74 to 50 Verdayne Ave., and although the lane at the rear of 2 to 10 (possibly up to 14) Firsby Ave is **NOT** within the Red Line Boundary of the proposal, access to these rear gardens is via the access Lane from Firsby Avenue which is contained within the new site boundary.
- 1.4.2 The **Land Registry Title Deeds** of No. **70 Verdayne Avenue**, Title No. **SY 3907** indicates the Rear Access has shared responsibility with other users who have access to their garages at the rear of their gardens. We have only had sight of the Title Deeds of 70 Verdayne Avenue but presumably this is the same for all the deeds of Nos. **50 to 74 Verdayne Avenue** and **2 to 14 Firsby Avenue**.
- 1.4.3 Therefore, the householders of **50 to 74 Verdayne Avenue** and **2 to 14 Firsby Avenue** must have continued free and unfettered access and use of the Access driveway to access their garages and rear gardens via the Access Lane. This access needs to be continued and included as **Restrictive Covenants** in the Deeds of all the proposed properties if this application is approved. This is **not** confirmed in the original or revised amended documentation.
- 1.5 The new trees at the rear of **54 to 58 Verdayne Avenue** would block vehicular access to these rear gardens and garages. **This is unacceptable.**
- 1.5.1 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 new Boundary Outline (Red) shows the East boundary at the rear of numbers **50 to 60 Verdayne Avenue** to have now, in the amended Site Plan **“partially”** absorbed the parcel of land between the rear boundaries of the properties and the east edge of the access lane from **Firsby Avenue** and has up to **4 trees blocking the access**. This difference is of significant concern as ownership of this section could become a **“Ransom Strip”** and preclude ingress and egress from the rear of these properties and access to their garages.
- 1.6 It is also unclear whether permission to refurbish and strengthen the access drive to sustain regular heavy Refuse or other large vehicles traversing, is required by these third parties as access to their properties from the access lane would be restricted during any major refurbishment or reconstruction works to the said access lane during the period of any such major works.
- 1.7 What is the mechanism to ensure this requirement is enforced, if the Case Officer is minded to recommend approval of this proposal as amended to committee?
- 1.8 The following Relevant Land Registry Title Numbers SGL 124640, SGL 119069, SGL 121093, SY 281091 are listed on the original Application Form.
- 1.9 None of these requirements which were formally stated in the Pre-Application Meeting notes have been adequately addressed in the supplied amended documentation and therefore we now object on these grounds.

2 The reduction in units from 9 to 8 houses

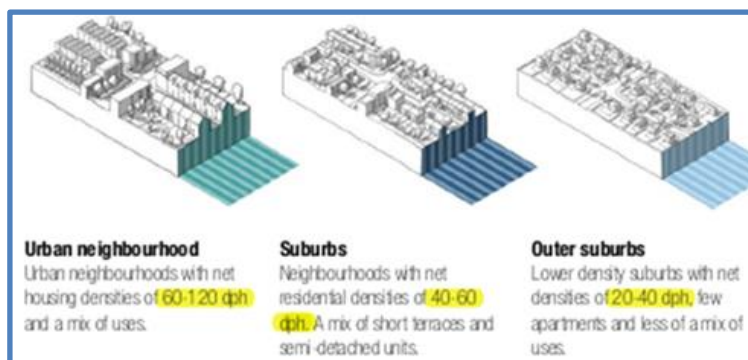
- 2.1 The reduction from **9 to 8 units** within the new site boundary of Area of **0.20ha** reduces the **Housing, Residential Densities** and the **Floor Area Ratio (FAR)**.

Land to The South of Firsby Avenue & East of Verdayne Avenue, Shirley -Amended Drawings														
Post Code	CR0 8TL	Site Area	2021.96	sq.m.	Residential Density:	252.23	hr/ha	PTAL		Floor Area Ratio (FAR)	0.49			
Received:	03/12/2021	Site Area	0.20	ha	Residential Density:	227.50	bs/ha	2011	2	Site Area Ratio (SAR)	N/A			
Amended Drawings	26/04/2022	Units	8		Housing Density:	39.57	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		3
		First	2	3	3	42		0.8						
		Second	1	2	1	26		Not Stated						
Unit 2	Type 1 M4(2)	Ground	0	0	2	44	99	0.8	2.5	2	1	8		3
		First	2	3	3	42		0.8						
		Second	1	2	1	26		Not Stated						
Unit 3	Type 1 M4(2)	Ground	0	0	2	44	99	0.8	2.5	2	1	8		3
		First	2	3	3	42		0.8						
		Second	1	2	1	26		Not Stated						
Unit 4	Type 1 M4(2)	Ground	0	0	2	44	99	0.8	2.5	2	1	8		3
		First	2	3	3	42		0.8						
		Second	1	2	1	26		Not Stated						
Unit 5	Type 3 M4(3)	Ground	0	0	2	48	99	1.9	2.5	2	1	8		3
		First	2	3	3	46		0.6						
		Second	1	2	1	29		Not Stated						
Unit 6	Type 2 M4(2)	Ground	0	0	2	50	121	0	3	2	1	10		5
		First	3	5	3	50		1.3						
		Second	1	2	2	37		2.1						
Unit 7	Type 2 M4(2)	Ground	0	0	2	50	121	0	3	2	1	10		5
		First	3	5	3	50		1.3						
		Second	1	2	2	37		2.1						
Unit 8	Type 2 M4(2)	Ground	0	0	2	50	121	0	3	2	1	10		5
		First	3	5	3	50		1.3						
		Second	1	2	2	37		2.1						
Totals			27	46	51	982	858	19.1	21.5	16	8	70	16	30

Parameters for the Proposed Amended Drawings

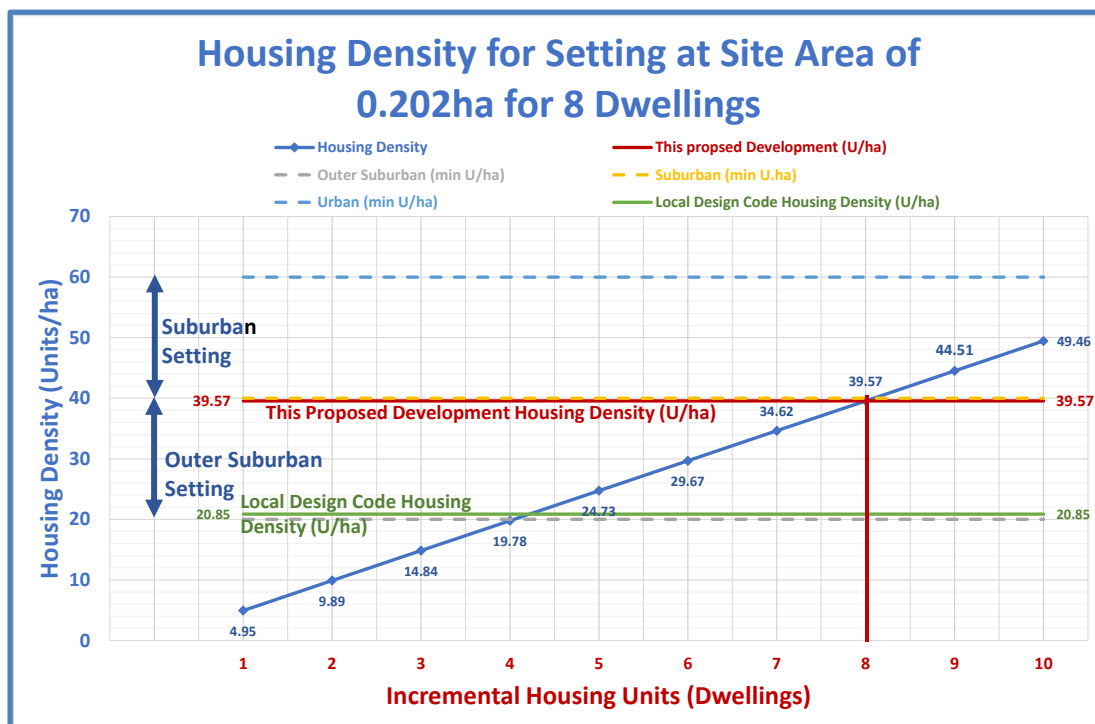
- 2.2 At 0.2ha and 8 units, the Housing Density is reduced to **39.57Units/ha** and the Residential Density at **~51 Habitable Rooms** is **~252.23hr/ha** or at an occupancy of **46 bedspaces** is **227.5 Bedspaces/ha**. If the Area of the lane is in addition to the 0.20ha Site Area, the Housing Density will exceed the 40units/ha for an outer suburban Setting.
- 2.3 This changes the **Design Code Area Type** or **Setting** to just within the “**Outer Suburban Setting**” of 20 to 40Units/ha
- 2.4 **National Model Design Code¹**
- 2.4.1 NPPF para 129 states: “*These national documents¹ should be used to guide decisions on applications in the absence of locally produced design guides or design codes.*” As there are NO references to appropriate **Design Codes** or Guidance in either the London Plan or the current or revised Croydon Local Plan, we accordingly reference the **National Model Design Codes** as recommended by Para 129 of the NPPF.

- 2.4.2 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.**



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

2.4.3 The proposal Housing Density at 39.57units/ha is therefore still just within the limit of the local Setting of “**Outer Suburban**” 20 to 40 **Units/ha**.



Graphical illustration of Housing Density against an incremental increase in Number of Units for the Site at 0.202ha

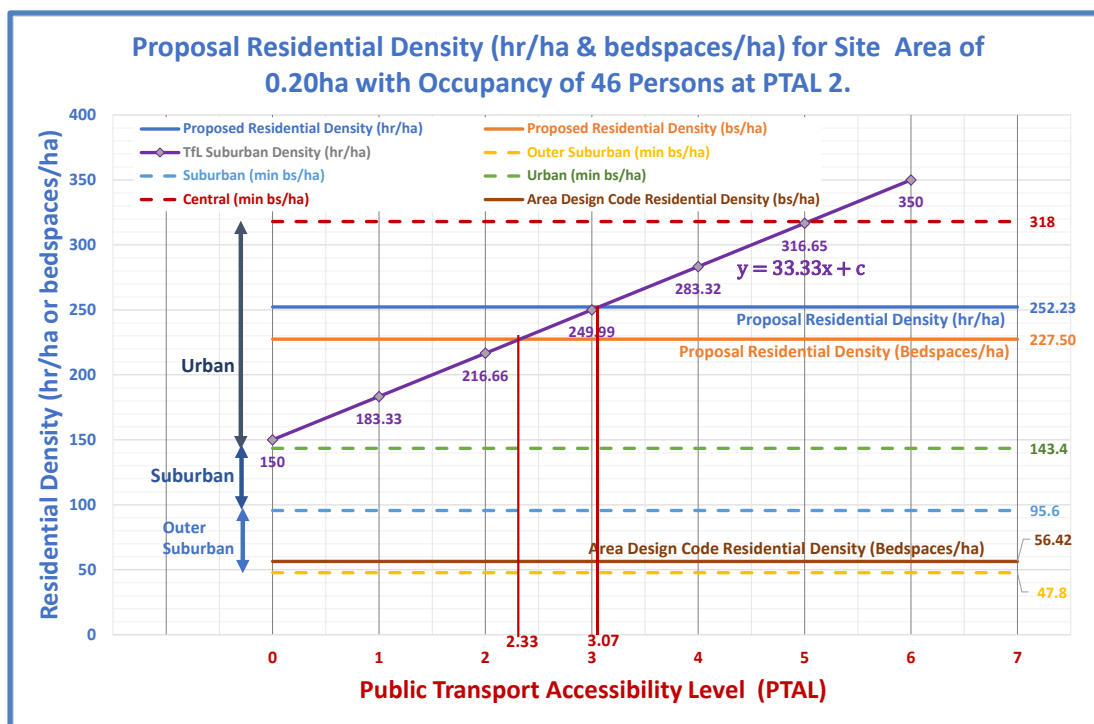
2.5 Floor Area Ratio (FAR)

2.5.1 A further parameter for assessing appropriateness of density is the **Floor Area Ratio (FAR)** in terms of **GIA/Site Area** (in m²) which for this proposal is now **≈0.49**. The recommended **Design Code for Suburban Settings** is **<0.5**. At **0.49**, the proposal therefore has an acceptable **Floor Area Ratio for a ‘suburban setting.’**

2.6 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/>



Housing Density to Residential Density by National Average Unit Occupancy. Public Transport Accessibility for Residential Density at the Area Type Setting

2.6.1 The **Residential Density** analysis shows that the required **PTAL** to support a proposed **Residential Density** of **252.230 hr/ha** would be:

$$252.23 = 33.33 \cdot x + 150 \text{ therefore } x = \text{PTAL} = 3.067 \approx \mathbf{3.07} \text{ or,}$$

Residential Density of **227.50 bedspaces/ha** would be:

$$227.50 = 33.33 \cdot x + 150 \text{ therefore } x = \text{PTAL} = \mathbf{2.325 \approx 2.33}$$

The available **PTAL** of **2** at this location is inadequate if judged on the habitable rooms/ha parameter but within tolerance if judged on the occupants/ha. This assumption is based upon the **ONS** and **Statista** Data of **National Occupancy per Dwelling**.

2.6.2 Local Design Code Area Type Setting Assessment and Analysis.

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
Post Code CR0 8S(*)	16.95	627	237	36.99	13.98	<Outer Suburban
Post Code CR0 8T(*)	11.82	644	246	54.48	20.81	Outer Suburban
Post Code CR0 7PL	1.73	47	19	27.17	10.98	<Outer Suburban
Post Code CR0 7QD	1.51	68	28	45.03	18.54	<Outer Suburban
Shirley "Place" ¹ (approx)	770.00	?	?	?	?	?
Average	205.08	8787	3670	42.72	17.35	<Outer Suburban
All Shirley	715.20	29814	12474	41.69	17.44	<Outer Suburban
Shirley Place (Estimates)	770.00	33414	13981	43.39	18.16	<Outer Suburban

Table of assessed Design Code Area Type Settings for the local area

- 2.6.3 The Residential Density, whether measured in **habitable Rooms/ha** or **bedspaces/hectare** and occupancy as defined at the **National** average of **2.39 persons per dwelling** would require an **Area Type Urban Setting** as defined by the **National Model Design Code and Guidance** (referenced from NPPF para 129) when the actual locality is **Outer Suburban** by **all** assessments and analysis undertaken.
- 2.6.4 However, the average occupancy of the proposal is $=46/8 = 5.75$ **Persons/Unit** which is $(5.75-2.39)/2.39 = 140.5\%$ increase in occupancy above the **national** average.
- 2.6.5 We therefore object to the amended proposal on the grounds of high Residential Density requiring an equivalent Area Type **Urban Setting** overdevelopment for the locality at **PTAL 2** when the required supporting Public Transport Accessibility for this Residential Density would require a **PTAL exceeding 3** and an Area Type **Urban Setting** when the locality is overwhelmingly an **Outer Suburban Area** Type Setting.

3 The incorporation of wooded buffer to the east of the site

- 3.1 Pre-App Meeting Notes 4th November 2021:
- 3.1.1 Design and Landscaping *“The scheme appears an overdevelopment of the site with little opportunity for landscaping, particularly pertinent given the removal of trees prior to submission of this pre-application which is not condoned.”*
- 3.1.2 Trees and Ecology
- “Given the number of trees and amount of habitat that has already been removed from the site officers will be expecting significant biodiversity enhancements and replacement tree planting as part of any redevelopment of the site. This adds to our position of overdevelopment as currently presented; much more space must be given over to meaningful soft landscaping, greening and biodiversity.”*
- As has already been stated, given the character of the area a reduced quantum of development and much higher proportion of landscaping will need to be achieved for any development of this site to be considered acceptable. The London Plan 2021 and new National Planning Policy Framework (NPPF) place greater emphasis on the greening of schemes and the planting of trees than previously. This would also help with sustainable drainage requirements and surface water run-off.*
 - Your client has not helped in facilitating a smooth planning application process by removing the trees in such a manner; our expectation is that a high-quality landscaping scheme comes forward on this site, which means much more space is required for plating as opposed to units.”*
- 3.2 The additional landscaping adjacent to Unit 4 (replacement for previous Unit 5) is beneficial but nowhere near enough to replace the lost vegetation which can be viewed on historical Google Earth images (See below) prior to the site clearance by the previous owner for preparation of subsequent development proposals.
- 3.3 The local residents did bring the major felling to the notice of Development Management as soon as feasibly possible but there was no appreciable action to either prevent or delay significant felling and site clearance at that time.

3.4 Vegetation prior to Site Clearance.



Google Earth Image 11th April 2019 (American Date format) of site showing Tree Canopy



3.5 The Google Earth Image shows the lost lush vegetation and Tree canopy prior to decimation without consent by the owner. It is understood that there were no Tree Preservation Orders on the Site Area.

4 Amendments to the extent of the Parking Stress Survey Area

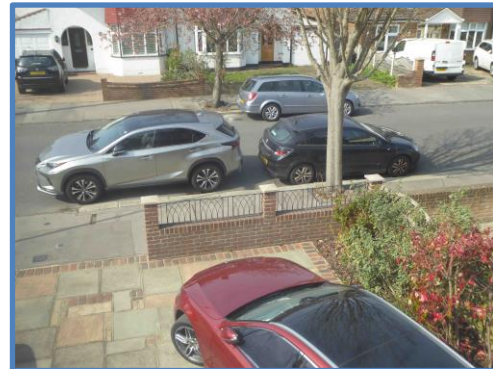
4.1 The **Revised emerging Croydon Local Plan Policy States:**

“DM30.2 Provide parking on-site to ensure that parking generated by the development does not contribute more than 5% increase in parking stress within a 200m catchment of the development; On-site parking stress in Croydon is assessed as being at capacity when 85% of parking stress is reached.”

The parking stress survey is to be within 200m; therefore Spring Park Road, West Way Gardens and Wickham Road exceed 300m from the entrance to the Development Site and should not therefore be included.

4.2 The Original Parking Stress Survey by  **Waterman Project WIE-18592** on **12th and 13th October 2021** identified the parking stress at **Firsby Avenue** to be **39%** on **Tuesday 12th October 2021** and **34%** on **Wednesday 13th October** but **Verdayne Avenue** to be **100%** on **Tuesday 12th October 2021** and **96%** on **Wednesday 13th October**. This is **11% to 15% above the 85% capacity**. These figures have been repeated in  the new survey by on the same dates of **12th and 13th October 2021**. Therefore, it is NOT new or revised information.

- 4.2.1 The Available Spaces is the Total Capacity (including Disabled Bays) minus the number of suspended/obstructions at the time of the survey.
- 4.2.2 “Is it illegal to park in front of a driveway? Strictly speaking, it is not always technically illegal to park in front of a driveway. However, parking over a dropped kerb is illegal and is a type of parking offence that is handled by councils.” This presumably is without permission from the householder.



- 4.2.3 It is understood that the correct way to park near a dropped kerb should give at least 1.5 metres (5ft) clear of the dropped kerb and that there are no other parking restrictions applying in this part of the road. The space is required to provide visibility splays, both ways, for a driver exiting from the drive to see oncoming traffic and to allow a swept path clearance for egress and ingress.
- 4.2.4 No 81 Verdayne is the only house from 81 - 93 Verdayne Avenue which does not have a dropped kerb at all. 93 is partially dropped to allow access to the side of the house. There is therefore parking space in front of the rest of 93 Verdayne.
- 4.2.5 On Firsby all the properties have at least partially dropped kerbs. There is room for one parking space outside 1-3, and one in front of 7. And the presence of a tree on the pavement between 10 and 12 means that a car could be parked at the un-dropped pavement there. Incidentally, there is an 11a Firsby. The numbers on that side follow 11; 11a; 15.
- 4.2.6 However, it seems that very little recognition of this parking restriction is observed by car drivers as illustrated by the Google Earth image and little council enforcement is applied resulting in the parking survey being quite a futile activity.

4.3 **Pre-Application Assessment Meeting Notes at Highways, Parking and Refuse:**

“Given the sites low PTAL and the lack of on street parking controls, car parking will need to be provided within the site in line with the maximum London Plan standards.”

- 4.3.1 The London Plan Table 10.3 Residential Parking Standards indicates Outer London areas with PTAL 2 to 3 for dwellings with greater than three Bedspaces have a maximum of 1 Space per dwelling, as provided by the proposal.

5 The incorporation of Cycle Parking, the increase in the width of the Access Road and the provision of granite setts to the entrance of the site.

5.1 Pre-App Meeting Notes 4th November 2021:

5.1.1 **Segregated pedestrian access** will also be required at a gradient no steeper than 1:12.

5.1.2 Both pedestrian (1.5m x 1.5m) and vehicular (2.4m x 25m for a 20mph road and 2.4m x 43m for a 30mph road) visibility splays will need to be indicated on plan. Swept path analysis for each parking space using a 4.8m long vehicle should be provided and if other larger vehicles (e.g., emergency services, refuse and servicing and delivery) are expected to enter the site swept paths for said vehicles will also be required.

- *Highways, Parking and Refuse: Given the sites low PTAL and the lack of on street parking controls, car parking will need to be provided within the site in line with the maximum London Plan standards. Given the distance of the development from the street refuse collection vehicles will need to enter the site. All cars and servicing vehicles will need to enter and leave the site in a forward gear. Cycle parking will need to meet London Plan standards.*
- *Sites should only provide a single vehicle crossover in line with the Council's current crossover guidance. New vehicular accesses will need to be at 90 degrees to the public highway and should be no wider than 5.5m (inclusive of the 0.5m wide side ramps either side of the flat section of the dropped kerb). Vehicular access routes should be no steeper than 1:6, and where steeper than 1:12 suitable transitions should be provided.*
- *Segregated pedestrian access will also be required at a gradient no steeper than 1:12.*
- *Both pedestrian (1.5m x 1.5m) and vehicular (2.4m x 25m for a 20mph road and 2.4m x 43m for a 30mph road) visibility splays will need to be indicated on plan. Swept path analysis for each parking space using a 4.8m long vehicle should be provided and if other larger vehicles (e.g., emergency services, refuse and servicing and delivery) are expected to enter the site swept paths for said vehicles will also be required.*
- *If amendments to the existing dropped kerb are proposed, the details of such changes should be clearly detailed within any future planning application. In order to secure any necessary changes to the public highway the Council may request the applicant to enter into a subsequent S.278 agreement, which is likely to be subject to a pre-commencement condition. Where changes are proposed to crossovers or site access, a footway survey before and after the development will be required, with any necessary reinstatement or repair work to be funded by the developer.*

5.1.3 There is no **“segregated pedestrian access”** as recommended in the Pre-Application Meeting Notes.

5.1.4 We note that the Pre-Application meeting recorded a **requirement** that the Applicant would:

a) *“need to demonstrate that the necessary improvements can be made to the access road to allow any future development to be safely and conveniently entered.”*

We see **no evidence of compliance** to the requirement for this demonstration. There is no schedule of structural improvements, kerbing or provision of footpaths in the package of amended drawings to satisfactorily demonstrate these required improvements.

b) *“need to be demonstrated that Cars, refuse and other servicing vehicles can enter and exit the site in a forward gear and not compromise safety with existing vehicular access to the rear garages.”*

5.1.5 The swept path diagram for the ‘exiting’ of a Refuse vehicle shows that a requirement of the full width of Firsby Avenue is required to safely exit from the access lane. The applicant has shown parked vehicles strategically positioned to allow clearance but there is no parking restriction, other than the disabled space in front of #3 Firsby Avenue, and therefore the whole road width needs to be clear of any parked vehicles as parking could not be predicted.



5.1.6 Although parking adjacent to dropped kerbs is considered illegal, it is not enforced locally, and we have many examples of local parking across dropped kerbs. Such parking could preclude the exit of the refuse vehicle from the access lane into the west bound carriageway of Verdayne Avenue as the full width is required as shown in the Swept Path illustration provided with the amended drawings.

5.1.7 We believe the Local Authority Highways Department should evaluate these Swept Path Diagrams for authenticity and to ensure the entrance and exit to/from the Site is unrestricted prior to any determination such that they are held accountable in the event of approval and subsequently access is found to be a significant problematical for the Refuse Vehicle Drivers. The dropped kerb at the entrance may need widening to avoid the vehicle damaging the existing kerbstones at the corners. It is noted that only the **Transportation Team - Planning Applications** have been consulted to date for comment, but not the **Highways Department**.

5.2 The important dimensions are given at Section 5.6 Fire Strategy. The entrance to the Driveway at the footpath on Firsby Ave is stated to be 4.9m and the narrowest point at the corner of the rear garden of the third dwelling from the corner of Firsby and Verdayne Ave., is stated to be 3.9m. **These measurements are prior to the installation of any kerbs in the upgrade of the access road.**

5.2.1 The length of the route from footpath to the furthest dwelling frontage as measured on Google Earth is \approx 60m and the length of the narrow driveway from footpath to the widening opening up to the site is \approx 45m.

- 5.2.2 The width of Firsby Ave., as measured by Google Earth is **≈5.8m** at the entrance to the access driveway.
- 5.2.3 The upgrade of the Access Drive should include kerbs on both sides which would reduce the width by 2 x 125mm (Marshalls British Standard) and at the narrowest point would reduce the width to 3.65m which is less than the SPD2 recommended minimum width of 3.7m. (3.6m at the entrance)
- 5.2.4 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.
- 5.2.5 This situation is 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 addressed.

6 Conclusions

6.1 A Revised Site Boundary (The Red Line)

- 6.1.1 There remain a number of requirements identified at the Pre-Application discussions of 4th November 21 which have not been addressed or resolved.
- 6.1.2 Although this may be a civil rather than a planning matter, the ownership and legal access to rear gardens from the access lane from Firsby Avenue should be addressed and resolved preferably prior to a determination.
- 6.1.3 It is also unclear whether permission to refurbish and strengthen the access drive to sustain regular heavy Refuse or other large vehicles traversing, is required by these third parties as access to their properties from the access lane would be restricted during any major refurbishment or reconstruction works to the said access lane during the period of any such major works.
- 6.1.4 The upgrade of the access lane to support the heavy duty refuse and other vehicles requires to be to the appropriate Road Specification and that detail and requirement is not included in the amended drawings.
- 6.1.5 There is no recognition of safety factors for pedestrians, pushchairs or disabled wheelchair users in the face of oncoming vehicles using the access lane.
- 6.1.6 We therefore believe there is sufficient evidence to Object to this proposal on the grounds that inadequate consideration has been given to these issues, some of which were the subject of the pre-application discussions and recommended requirements.

6.2 The reduction in units from 9 to 8 houses

- 6.2.1 At 0.2ha and 8 units, the Housing Density is reduced to 37.57Units/ha and the Residential Density at ≈51 Habitable Rooms is ≈252.23hr/ha or at occupancy of 46 bedspaces is 227.5 Bedspaces/ha.
- 6.2.2 This changes the Design Code Area Type or Setting to just within the “Outer Suburban Setting” of 20 to 40Units/ha
- 6.2.3 the occupancy of this proposal is 5.75 persons per unit, However, based on the national average occupancy of 2.39 person/unit the Residential Density analysis

shows that the required PTAL to support a proposed Residential Density of 252.230 hr/ha would be ≈ 3.07 or, Residential Density of 227.50 bedspaces/ha would be ≈ 2.33 .

6.2.4 However, the average occupancy of the proposal is $=46/8 = 5.75$ **Persons/Unit** which is $(5.75-2.39)/2.39 = 140.5\%$ increase in occupancy above the national average.

6.2.5 We therefore object to the amended proposal on the grounds of high Residential Density requiring an equivalent Area Type **Urban Setting** overdevelopment for the locality at **PTAL 2** when the required supporting Public Transport Accessibility for this Residential Density would require a **PTAL exceeding 3** and an Area Type Urban Setting when the locality is overwhelmingly an Outer Suburban Area Type Setting.

6.3 The incorporation of wooded buffer to the east of the site

6.3.1 The additional landscaping adjacent to Unit 4 (replacement for previous Unit 5) is beneficial but nowhere near enough to replace the lost vegetation which can be viewed on historical Google Earth images prior to the site clearance by the previous owner for preparation of subsequent development proposals.

6.3.2 The local residents did bring the major felling to the notice of Development Management as soon as feasibly possible but there was no appreciable action to either prevent or delay significant felling and site clearance at that time.

6.4 Amendments to the extent of the Parking Stress Survey Area

6.4.1 It is not clear what has been achieved by the provision of the supposed amendments to the Parking Stress survey as the data is identical to that previously provided and the survey data for exactly the same times on 12th and 13th October 2021. The inclusion of parking on the red route of Wickham Road is also irrelevant to the stress calculation, since nobody is likely to want to park there between 7pm and 7am, when they would in most cases have already found somewhere to park in Verdayne, Ridgemount or Firsby Avenue.

6.4.2 The legality of parking in residential areas across dropped kerb frontages is not enforced by the Council and therefore the stress calculations seem somewhat arbitrary.

6.4.3 It is extremely unlikely that drivers would seek spare bays on the South side of Wickham Road as the distance is too great from the proposal to be of any convenience.

6.4.4 Although the proposed allocation of parking meets the London Plan recommendations for outer London at PTAL 2, there are no additional spaces for visitors or for unit 5 type M4(3) Care Providers who may need to carry medical equipment or supplies from their vehicle.

6.4.5 Why is the stress not calculated during the daytime, when our streets are filled with drivers who park all day to get buses from the Shirley Library stop to go to Croydon for work or to catch a train to London? (The bus stop by the traffic lights at Shirley Library is the first where four buses merge from three directions heading for East, West and South Croydon).

6.5 The incorporation of Cycle Parking, the increase in the width of the Access Road and the provision of granite setts to the entrance of the site.

6.5.1 There is no segregated pedestrian access along the access lane.

6.5.2 There is no perceptible **increase in the width** of the Access Lane from that previously proposed.



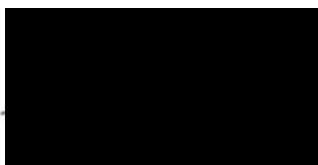
- 6.5.3 There is no acknowledgement of the required improvement to the access lane such as a specification of the design to meet the structural loading requirements or appropriate kerbing requirements. There are no definition requirements for pedestrian, children and pushchair users or wheelchair users access for Lane safety requirements.
- 6.5.4 The swept path illustrations assume that the full widths of Verdayne/Firsby Avenues are available when there are no enforced parking restrictions, other than the disabled bay fronting #3 Firby Avenue. Parking fronting dropped kerbs is not enforced by the Council and therefore is regularly ignored by visiting drivers.
- 6.5.5 The dropped kerb access to the Lane may require widening at the entrance to the access Lane, but there are no proposals to do so.

7 Summary

- 7.1 All the foregoing assessments of the proposed amended documentation, give sound reasons to object to the proposals as they do **NOT** meet the agreed requirements as discussed and recommended at the Pre-Application Meeting notes of 4th November 2021.
- 7.2 When considering the MORA representation for this application, please consider both our original submission of **29th December 2021** and this **Addendum as an objection** together as the MORA representation and contribution for this application.

Kind Regards

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