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**Monks Orchard Residents'
Association
Planning**

23rd May 2022

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Reference: 21/06387/FUL
Application Received: Thu 30 Dec 2021
Application Validated: Tue 19 Apr 2022
Address: 395 Addiscombe Road Croydon CR0 7LJ
Proposal: Erection of four-storey building to provide 145.7sqm GP Surgery (Use Class E(e)) and nine (9) self-contained flats (following demolition of existing two-storey mixed-use building (Use Classes C3 and E(e)), Associated amenity, cycle storage, vehicle parking and waste storage spaces, and Associated alterations including landscaping and formation of boundary treatments
Case Officer: Demetri Prevatt
Ward: Addiscombe East
Consultation Close Date: Fri 27 May 2022
Determination Deadline: Tue 14 Jun 2022

Dear Mr Prevatt & Development Management,

Although this proposal is in the Addiscombe East Ward, we are an adjacent Ward (Shirley North) and would like to comment on the proposal on behalf of our members in Shirley Avenue who are affected. Please accept this letter as a formal **objection** to **Application Ref: 21/06387/FUL**. We understand the need for additional housing, but that new housing developments and Residential Extensions & Alterations 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.



Proposed development

**Representing, supporting and working with the local residents
for a better community**



1 The Proposed Development's Parameters:

395 Addiscombe Road			App Ref: 21/06387/FUL													
Site Area	875.22	sq.m.	Residential Density		342.77	hr/ha		PTAL 2011	3		GIA Ratio	0.70	Residential			
Site Area	0.0875	ha	Residential Density		342.77	bs/ha		PTAL 2021	3		GEA Ratio	1.24				
Units	9		Housing Density		102.83	u/ha		PTAL 2031	3		Ave hr/u	3.33				
(*) Kitchen & Dining Open Plan			Average Occupancy/Unit		3.33	bs/unit										
Unit	Type	Floor	Bedrooms	Bedspaces	Habitable Rooms (*)	GIFA Offered	GIFA Required	GEFA Proposal	Built-In Storage Offered	Built-In Storage Require	Private Amenity Space offered	Private Amenity Space Required	Probable Adults	Probable Children	Play Space (sq.m.)	
GP Surgery		Ground				142.7		276.7			35					
Totals																
Flat 1	M4(3)	Ground	3	4	4	79.5	74	264	None Offered	2.5	61.7	7	2	2	20	
Flat 2	M4(3)	First	3	4	4	74.4	74		None Offered	2.5	7.1	7	2	2	2	20
Flat 3	M4(2)	First	2	3	3	63	61		None Offered	2	7.1	6	2	1	10	
Flat 4	M4(2)	First	2	3	3	61.02	61	264	None Offered	2	6	6	2	1	10	
Flat 5	M4(3)	Second	3	4	4	74.4	74		None Offered	2.5	7.1	7	2	2	20	
Flat 6	M4(2)	Second	2	3	3	63	61		None Offered	2	7.1	6	2	1	10	
Flat 7	M4(2)	Second	2	3	3	61.02	61	279.5	None Offered	2	6	6	2	1	10	
Flat 8	M4(2)	Third	2	3	3	68.3	61		None Offered	2	6.4	6	2	1	10	
Flat 9	M4(2)	Third	2	3	3	68.3	61		None Offered	2	6.4	6	2	1	10	
Totals			21	30	30	612.94	588	1084.2	0	19.5	114.9	57	18	12	120	

This Table summarises the important parameters relevant to this development proposal which are referenced throughout the following submission.

2 Growth Policies

2.1 Croydon Local Plan

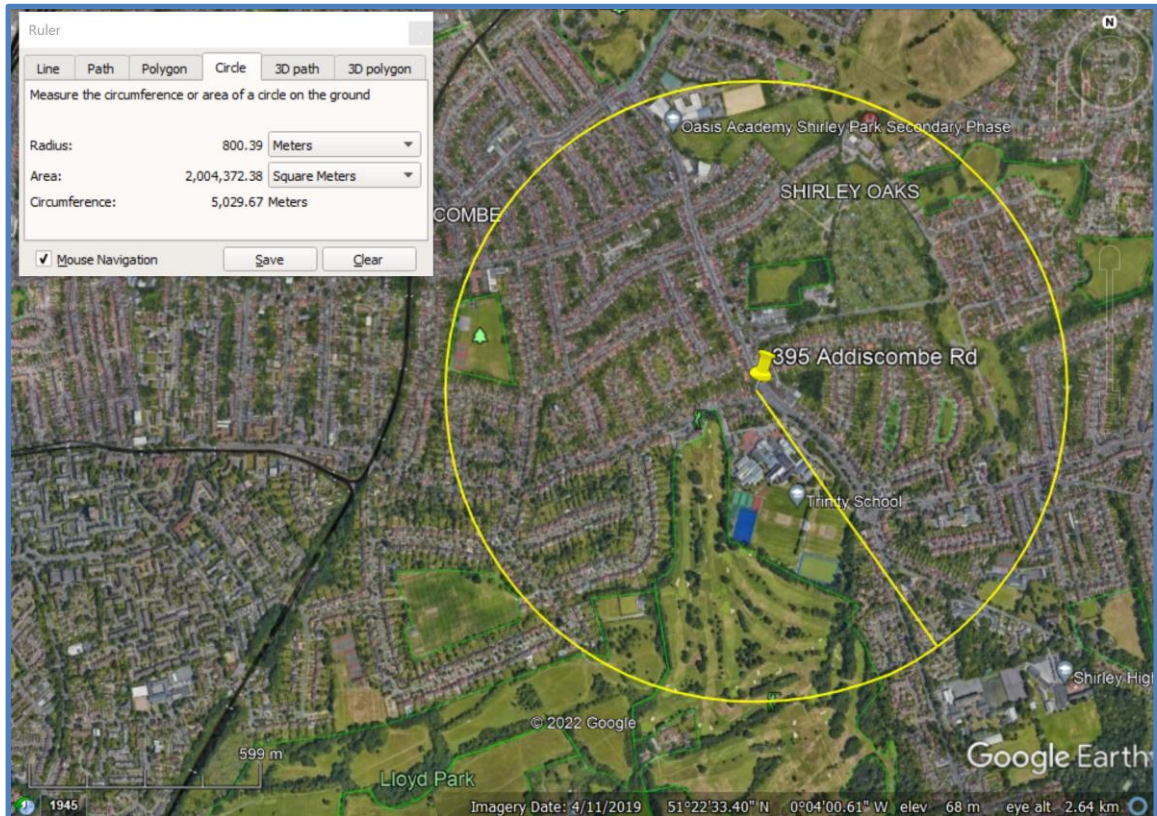
- 2.1.1 The current Croydon Local Plan (2018) '**Growth**' Policies, as defined in **Table 6.4**, DM10.1 to DM10.11 or DM34 to DM49 and DM36 to DM49 'purports' to describe "**Growth**" by either "**Redevelopment**" or "**Evolution**" by "**Regeneration**", but gives no definition of the acceptable magnitude of growth in terms of '**Site Capacity**', '**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.
- 2.1.2 However, the **Revised Croydon Local Plan¹** 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., still No defining meaningful parameters*). **Paragraph 6.62** has been modified to include a "**Moderate Intensification**" designation and **6.56a** to include a "**Gentle densification**" designation, but again, there is no definition for what is meant by "**Moderate**" or "**Gentle.**" These are abstract objectives, **NOT policies** that are sufficiently adequately defined to be enforceable!
- 2.1.3 Study of the location on the Policies Map indicates no defined **growth intensification** at **395 Addiscombe Road** and therefore limited "**Gentle**" growth would presumably be appropriate for this development. However, there is no definition of what "**Gentle**" **densification** actually means.
- 2.1.4 We have investigated the National Policies to define acceptable levels of density based upon the **NPPF** in the **National Model Design Code & Guidance**.

¹ <https://www.croydon.gov.uk/sites/default/files/2022-01/croydon-local-plan-2018-revised-2021-part-1-start-to-section-11.pdf>



2.2 London Plan Policy H2

2.2.1 The **London Plan** para 4.2.2 States: *Incremental Intensification of existing residential areas within PTALs 3-6 or within 800m distance of a (Train/Tram) station or town (District) centre boundary;* as 395 Addiscombe Road has **PTAL 3** but is greater than >800m from a Train/Tram Station or District Centre, this location could be considered appropriate for “**Gentle**” densification” but it is **NOT** considered appropriate for “**Moderate**” as shown on the Policies Map.



Google Image of 395 Addiscombe Road indicating > 800m from a Tram/Train Station or District Centre and thus inappropriate for Incremental Intensification

3 Design Code Assessment

3.1 Croydon Local Plan

3.1.2 The **Draft 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 “**Design Codes**” for **Residential localities** have been completely disregarded.

3.1.3 In addition, the **Draft Revised Croydon Plan** does **NOT** reference the **NPPF National Model Design Guides** or **Design Codes** as referenced from **NPPF para 129**. There are still no **Policies** to actually “**manage**” Growth in the **Revised Draft Croydon Local Plan**.



3.2 London Plan

3.2.1 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 densities²**), 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**”³ of the **site’s attributes**, its surrounding context and its **capacity for growth** to determine the appropriate form of development for that site.”

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.”

Policy H2 Para 4.2.5.

“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.”
(The issue is there is NO definition of the magnitude of “incremental,” but a definition should be defined in the **Design Code**).

3.2.2 However, these requirements do **NOT** provide guidance on an appropriate assessment or evaluation of a local “**Design Code**” but require the LPA to define the specific guidance in their local plans, to which Croydon have not complied in their Revised Croydon Plan (December 21).

3.3 NPPF

3.3.1 The NPPF have provided guidance at para **129** which states:

“**129. 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

² https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf

³ Definition of “**evaluation**”: The making of a judgement about the **amount, number, or value** of something.

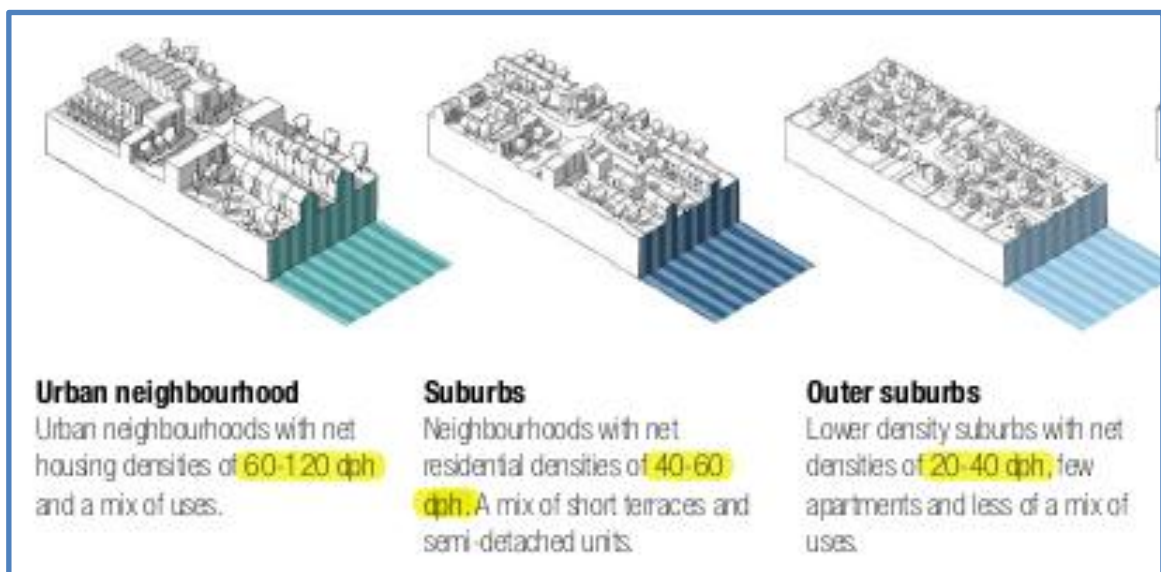


*documents. Landowners and developers may contribute to these exercises but may also choose to prepare design codes in support of a planning application for sites they wish to develop. Whoever prepares them, all guides and codes should be based on **effective community engagement** and reflect local 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.***

3.3.2 This is exactly the situation with the Croydon/London Plans.

3.4 Local Design Codes

3.4.1 The **National Model Design Code & Guidance**⁴ published by the **Department for Levelling Up, Housing & Communities (DLUHC)** June 2021 provides guidance on establishing the Housing Density for Area Types and Settings at Part 1, Coding Process, 2B Coding Plan (Page 14 illustration 10 – Area Types).



3.4.2 As of **15th May**, the **Valuation Office** listed **21 Dwellings** from **359 to 395 Addiscombe Road** for the **Post Code Area CR0 7LJ** and the website⁵ gave a population of **53** occupants which equates to an average of **2.524 persons per dwelling** (Not much different from the National Average of **2.36**⁶ occupant/unit at year 2021). The Google Earth Image gives an approximate Area of **10,226m² = 1.0226ha** and thus, the **Post Code Area CR0 7LJ** has an existing local **Design Code Housing Density** of $21/1.0226 = 20.536\text{units/ha}$ and a local **Design Code Residential Density** of $20.536 \times 2.524 = 51.829\text{occupants/ha}$.

3.4.3 This assessment places **395 Addiscombe Road** at a **Design Code House Density Type Setting** at **20.536U/ha** in the **20 to 40 Units/ha Range** of an **Outer Suburban Setting**.

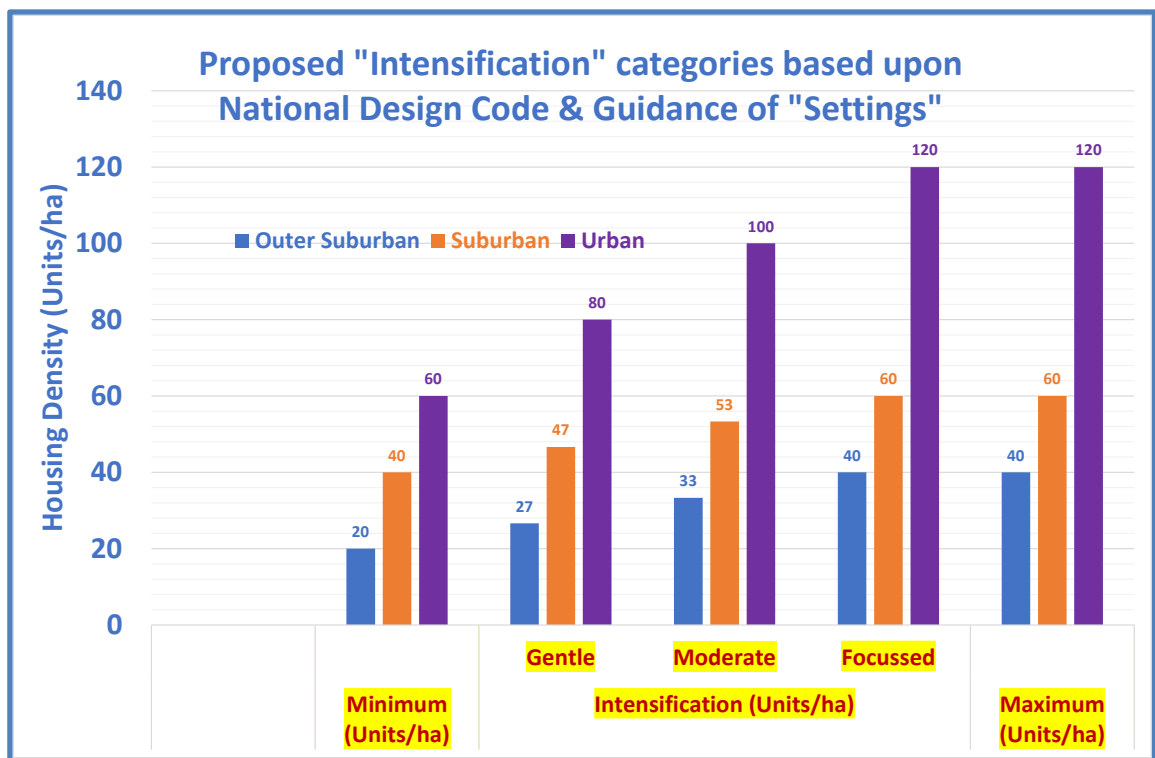
⁴ <https://www.gov.uk/government/publications/national-model-design-code>

⁵ [CR0 7LJ \(Croydon\) postcode - demographic & neighbourhood report \(postcodearea.co.uk\)](https://www.postcodearea.co.uk/CR0-7LJ-Croydon-postcode-demographic-neighbourhood-report)

⁶ <https://www.statista.com/statistics/295551/average-household-size-in-the-uk/>



- 3.4.4 However, as the proposal has **PTAL 3** and is forecast to remain at **3** up until **2031** the locality could be considered for **“Gentle” Intensification**.
- 3.4.5 There is no meaningful definition of **“Growth”** in either the adopted **Croydon Local Plan** or the **Revised Croydon Local Plan** (December 2021) or the **London Plan** and therefore the **NPPF Definitions form the basis of evaluation**.
- 3.4.6 As the **National Model Design Code** Area Types exist on the availability of supporting infrastructure, any intensification within an Area Type or Setting relies on the existing Supporting infrastructure and therefore the **Design Code Density** should remain **within** the Setting or **Area Type “Ranges”** as defined (Outer Suburban, Suburban, Urban or Central), It is suggested that **poor infrastructure** would require the **Design Code Density to tend toward the lower value**, and, **higher infrastructure** provision **tend toward the higher** of the **Setting Range**. Similarly, the **Intensification** should follow the same principles as follows:

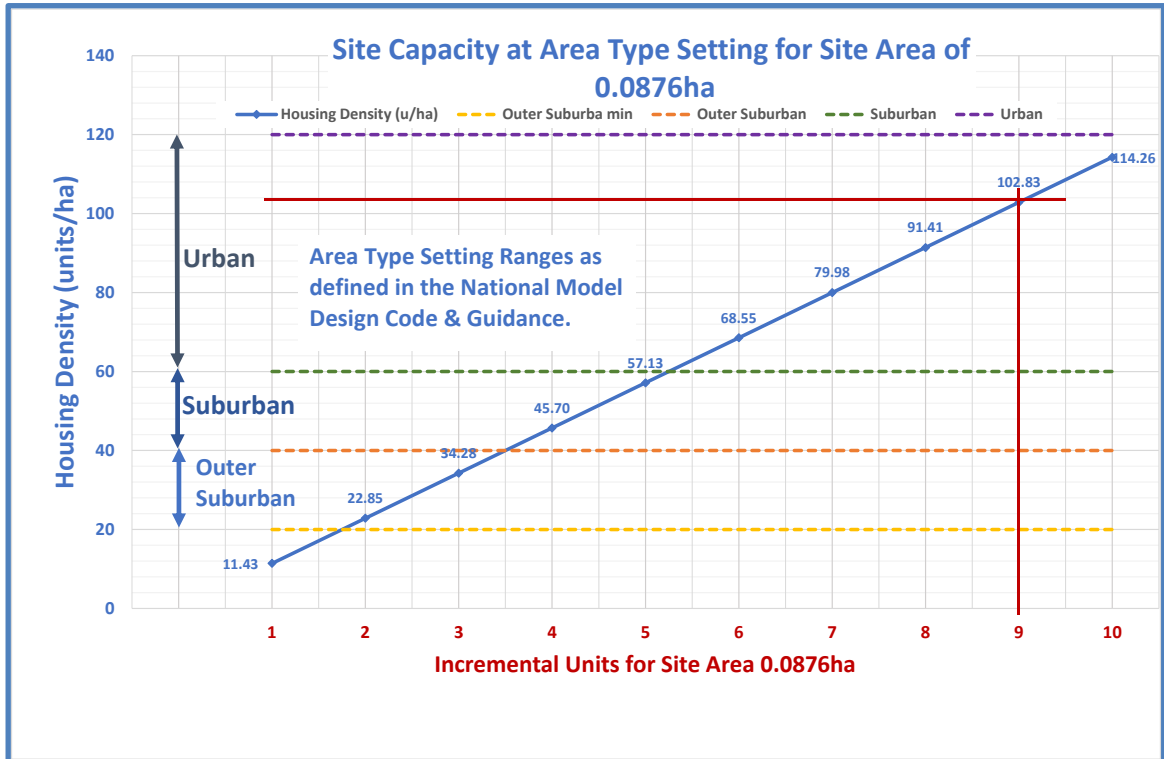


Suggested limits of Intensification for “Gentle,” “Moderate” & “Focussed” for each Area Type or Setting

- 3.4.7 We have shown an **incremental** increase in **Design Code Density** of $\frac{1}{3}$ & $\frac{2}{3}$ between Settings for **“Outer Suburban”, “Suburban”** and **“Urban”** for **“Gentle”, “Moderate” and “Focussed”** Intensification. There is **NO** equivalent for **“Central”** Area Type setting, as there is **NO** defined maximum. The Maximum Density at **“Central”** Area Types or Settings is defined by the proposals requirement to meet the **Minimum Internal Space Standards** and **Private Amenity Standards**. This is our interpretation of Local Plan Policy as there is no meaningful guidance in the Croydon Revised **Local Plan** or the **London Plan**.



3.4.8 However, the proposed development **exceeds** this **Design Code** as shown in the following graphical illustration. Therefore, as there is **NO** Design Code guidance in the **Local Plan**, the **National Model Design Code Guidance** is to be used for **Design Code assessment** which provides clear evidence of over-development of the proposal **Site Capacity** at this Area Type Setting at the **Post Code Area** at **CR0 7LJ**.



Design Code Housing Density for proposal at 395 Addiscombe Road would require the Area Type to be Urban when the locality is predominantly Outer-Suburban.

3.4.9 Thus, even allowing for **“Gentle” densification**, the proposal exceeds the local Suburban Area Type Setting Maximum Density of **60 Units/ha** and is tending toward the higher of the **Urban Area Type** or Setting range of **60 to 120 units/ha** at **102.83Units/ha** which is **conclusively a significant over development**.

3.5 Residential Design Code Density

3.5.1 The Residential Density as measured in habitable rooms per hectare or bedspaces per hectare are coincidentally equal at **342.77 hr/ha** and **bedspaces per hectare**.

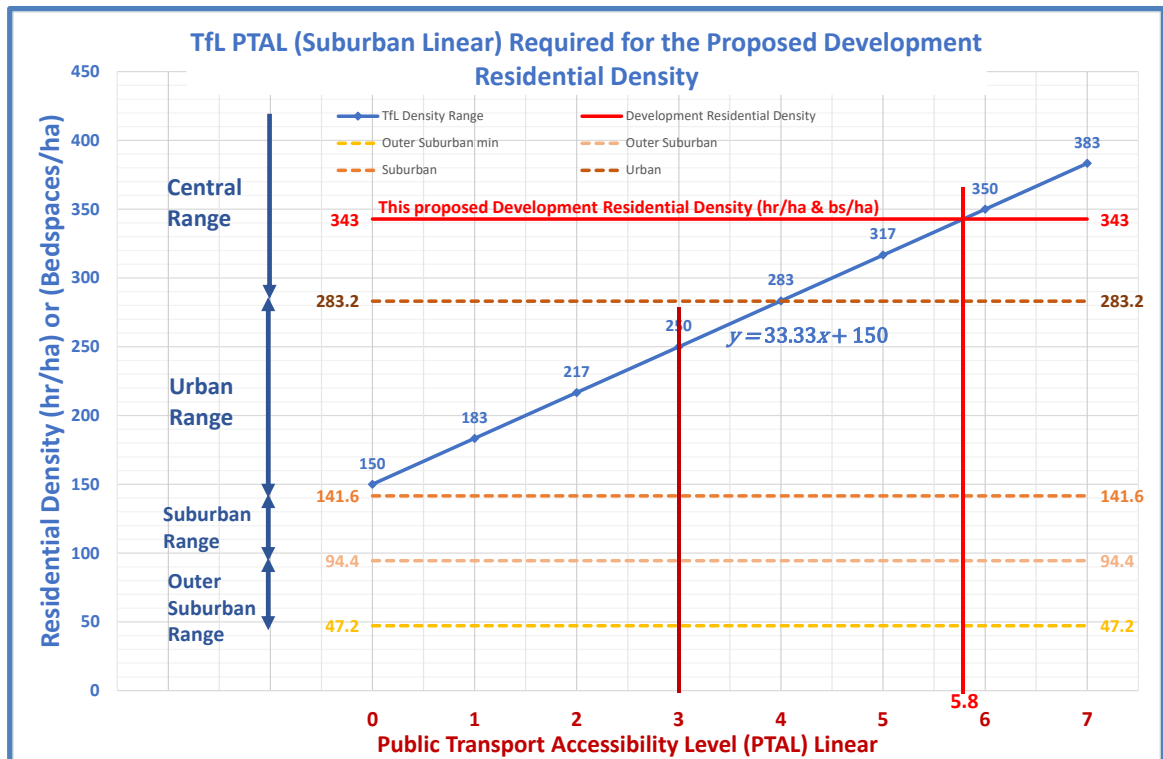
3.5.2 It should be noted that it is people that require public services infrastructure, such as public transport accessibility, GP Services & Schools, NOT Housing Units, so an appropriate **Residential Density** in Bedspaces/ha should be defined for each setting. There is no guidance provided for this parameter so we should investigate an appropriate range for each setting

3.5.3 The TfL Density Matrix has been omitted from the Revised **London Plan** but is retained for the **Public Transport Accessibility Level (PTAL)** assessment using the **TfL**



WebCAT 7. The equivalent **Residential Density** appropriate for **Suburban Settings** has a range of **150 at Zero PTAL to 350 at PTAL 6**. If we assume that the range is **incrementally linear**, we can extrapolate what **PTAL** would be required for the proposed development with a **Residential Density 343 hr/ha or 343 bedspaces/ha**.

3.5.4 Assuming a linear progression, the required **PTAL** for the proposal is found by: $343 = 33.33 * x + 150$ where $x = \text{PTAL} \approx 5.8$ when the available PTAL is 3.



Graphical Illustration of Residential Density and Public Transport Accessibility Level (PTAL) for the proposed development at 395 Addiscombe Road.

3.5.5 It is also apparent that the **Residential Density** of the **Post Code Area** is **2.524 person/unit** compared to the **National Average for 2021 of 2.36 persons per Unit**. As the **National Design Code Guidance** provides **National Guidance**, it is reasonable to assess the **PTAL on National figures** as the **Local Plan** does NOT provide any guidance. The Graphical Illustration above uses a conversion of **2.36 Person per Unit** to convert **Housing Density to Residential Density** based on those **National parameters**.

3.5.6 The above analysis clearly establishes that the proposed development would require a **PTAL** of approaching **≈6** when the available **PTAL** is only **3** and that the **Residential Density** is more appropriate for a **“Central” Setting** than a **Suburban Setting** which is further clear evidence of a significant **over-development** or inadequate **Site Capacity** to support the proposed development.

⁷ <https://content.tfl.gov.uk/connectivity-assessment-guide.pdf>



3.6 Floor Area Ratio

3.6.1 A further parameter for establishing the appropriateness of a proposed **Density** for the **Area Type Design Code** Setting, is the **Floor Area Ratio (FAR)**. For **Suburban Area Type** Settings, the recommended **FAR** as defined in the **National Model Design Code and Guidance** and as measured by **GIA/Site Area** in sq.m. **should be NO Greater than 0.5**. The proposed development has a **Floor Area Ratio (FAR)** of Residential GIA/Site Area of $612.94/875.22 = 0.70$ which is $(0.7-0.5)/0.5 = 0.4$ i.e., **40%** above the recommendation and further evidence of over development of the **Site Capacity**.

4 Space Standards

4.1 Croydon Local Plan Policies

4.1.1 **SP2.8 States** *“New Housing should meet minimum design and amenity standards set out in the Local Plan Policies and proposals as well as the internal space standards for different sized dwellings set out in Table 3.1 of the London Plan.”*

4.1.2 Policy **DM 1A** Amenity standards for residential developments

(b) *Provides a minimum amount of outdoor space of 5m² per 1–2-person unit and an extra 1m² per extra occupant thereafter; and it must achieve a minimum depth and width of 1.5m*

(d) *All flatted developments and major developments need to provide a minimum of 10m² per child of new play space, calculated using GLA's the Mayor of London's population yield calculator*

4.2 London Plan Policies

4.2.1 The London Plan Minimum Space Standards are detailed in Table 3.1

4.2.2 The London Plan emphasises that these are '**MINIMUM**' dimensions and that proposals should **exceed** them wherever possible and the **SPG Housing Design Standard at C2.2 States:**

*“C2.2 **Best Practice:** Exceed the minimum overall floor areas by at least 5% (see standards C2.5 to C2.11 and C3.6).”*

4.2.3 The proposal meets the **Minimum Internal Space Standards GIFAs** but does NOT provide a **5%** excess as recommended **Best Practice** listed in the **SPG Housing Design Standard C2.2**. The offered total **GFIA** is **612.94** and the Minimum standard is **588** i.e. $(612.94 - 588)/588 = 0.0424 = 4.24%$ above minimum.

4.3 Built-In Storage

4.3.1 The Development Proposal has **NO** offered **Built-In Storage Capacity** for normal everyday living requirements. Again, Table 3.1 lists the required '**MINIMUM**' **Built-In Storage** for the various Sized Units (Bedrooms and Occupants). The Total Storage for the proposed development would be **19.5 sq.m.** and there is **NONE**. This is further evidence of **overdevelopment** as the applicant cannot squeeze in this additional required **Built-In Storage** within the **Site Capacity**. The requirement is for a **MINIMUM** which should be exceeded if possible. The lack of any **Built-In Storage** is completely **unacceptable**.



4.4 Amenity Space

4.4.1 The proposed development meets the Private Amenity Space Standards distributed across the **9 Units**.

4.4.2 The Communal and Play Area as shown on the Site Layout, is combined at $(5.5 \times 5.4) + (5.5 \times 1.0) / 2 = \mathbf{32.45 \text{ sq.m.}}$. The **London Plan Policy S4 Play and informal recreation States:** *“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.* **The proposal therefore is totally inadequate for three reasons:**

a) The Play Space for Children is NOT separated from the Communal amenity Space.

b) The Play Space does NOT meet the requirement of **10sq.m. per child**. The probable number of children accommodated in the proposal would be ≈ 12 which in accordance with both the Revised Croydon Plan and The London Plan requires **10sq.m. per child which therefore requires 120 sq.m.**

c) The **Communal Open Space** plus the required **Play Space for Children** is not adequate and the **Site Capacity** is insufficient to provide adequate space and an appropriate proportion of area to be provided for this amenity requirement.



Site Layout with Communal Garden Area and Play Space for Children.

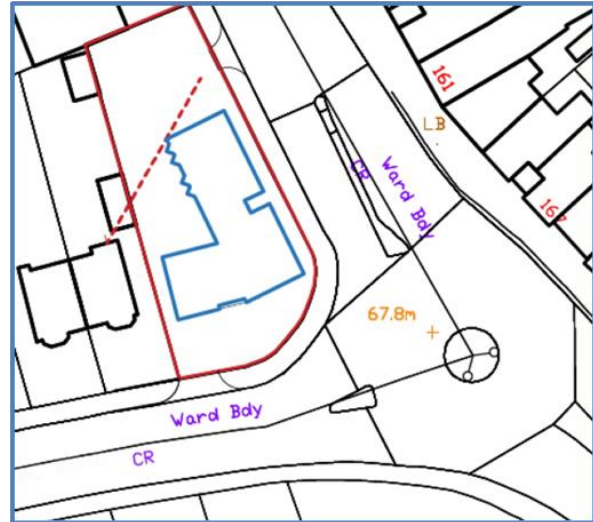
5 Access

5.1 The Ground Floor GP Surgery fronts Addiscombe Road (A232) at the roundabout Junction with Shirley Road.

5.2 The Parking Bay for the surgery is for Disabled Drivers.



5.3 A Vehicle entering from the south via Shirley Road dual carriageway (A232) or North Shirley Round via the roundabout will need to enter the roundabout and take the exit onto Addiscombe Road (A232) and virtually immediately cross the flow of traffic to enter the surgery driveway. This seems an extremely hazardous manoeuvre, which is likely to cause tailbacks and congestion at the roundabout while a driver is awaiting an opportunity to cross the line of traffic to enter the GP surgery.



5.4 The GP Surgery access is close to a Pedestrian controlled "Pelican Crossing" with "zig-zag" road markings & Red Route Parking restrictions on the Addiscombe Road, and the cross-over "dropped kerb" Residential Parking Entrance is approximate 20m from a "Zebra Crossing" similarly with "zig-zag" Road markings & Red Route parking restrictions on the Shirley Road (A215).

6 Parking

6.1 Parking Provision for the GP Surgery & Residential Accommodation

- 6.1.1 The Parking provision for the Ground Floor GP Surgery is fronting Addiscombe Road (A232) at the roundabout Junction with Shirley Road (A232 & A215) and is allocated for one Disabled Bay. The Residential Parking fronting Shirley Road (A215) is for 5 Bays, one of which is a disabled Bay. Both these locations have RED Route Parking restrictions and "Zig-Zag" markings for the Pelican Crossing in Addiscombe Road and the Zebra Crossing in Shirley Road. (We question the viability for "Dropped Kerbs and crossovers" this close to the Pelican Pedestrian and zebra crossings).
- 6.1.2 The revised **Croydon Plan Residential Parking** provision at **PTAL 3** at Table 10.1 gives up to **0.75 spaces** for 1 & 2 Bedroomed Dwellings and **1** space for 3 Bedroom + Units which for this proposal equates up to **7.5** spaces for the Residential Development where only **5** spaces are provided.
- 6.1.3 The **London Plan Residential Parking** provision is given at **Policy T6.1 Table 10.3** and is the same as the Croydon Plan at **0.75 spaces** for 1 & 2 Bedroomed Dwellings and **1** space for 3 Bedroom + Units which for this proposal equates up to **7.5** spaces for the Residential Development where only **5** spaces are provided.
- 6.1.4 The National average Car Ownership per household in the UK is **1.21** and in London is **0.74**. As an estimate for **Outer London Boroughs** the Average would approximate to **0.98** per household. With **18** probable Adults and **9** families at **0.98 per unit** there would probably be a requirement of **9.18** Parking Spaces for this development proposal. Thus, there would probably be an overspill of $\approx(5-9.18) \approx -4.18 \approx 4$ vehicles. This does NOT include any Vans or Commercial vehicles used by a householder for any business activity requiring overnight parking.



- 6.1.5 Shirley Avenue, in the Shirley North Ward, which exits Shirley Road virtually opposite the proposed site, is normally full during the day, presumably Croydon commuters', cars to avoid high daily parking fees in Croydon. The Google Earth image of 11th April 2019 shows all kerb spaces, other than dropped kerb crossovers, are full for ≈165m from the Shirley Road Junction. The Green Court Avenue to the northwest of the proposed development is a narrow residential street of ≈5m width which precluded double parking and has yellow line parking restrictions (Google Earth). Any additional parking would be inconvenient for other residents.
- 6.1.6 This provision does NOT include any delivery vehicles for the Residential Units and due to the RED Route restrictions and Zebra Crossing “zig-zag” markings, there is no possibility to park in close proximity to the development when possibly heavy content is to be delivered.
- 6.1.7 The GP Surgery, as a functional activity, will require regular deliveries of clinical products and may require Fork-lift transport from vehicle to the Surgery. Again, this cannot be from the roadside as the A232 is on a RED Route.
- 6.1.8 The overall Parking provision assessment is therefore inadequate. This allocation cannot be increased due to the limited **Site Capacity** and is further evidence of **Overdevelopment**.
- 6.1.9 The Transport Statement at para 3.9 is **NOT TRUE**. The Swept Path illustrations do **NOT** show the path of the vehicles in either the Parking Egress or Ingress for the GP Surgery Bay or the Residential Bays. The Paths shown on the illustration only shows the path of **ONE axle wheel trajectory**, NOT both front and rear **wheel Axle swept paths**. Therefore, the illustrations are **NOT possible trajectories of any vehicle swept paths** for entrance or exit from **any parking** position and therefore they are completely **invalid** for assessment of **parking possibility**.



Inadequate Swept Path illustrations – GP Surgery and Residential

- 6.1.10 The Swept path of a vehicle requires the **trajectory of both front and rear wheels** as they do **NOT follow the same paths** but are physically related to the steering direction of the front wheels and the **wheelbase**. The trajectory must also take account of the vehicle bodywork **overhang, front and rear**. None of these factors are illustrated in the supplied drawings which **completely invalidates** the proposed **Parking acceptability**.



7 Summary and Conclusions

- 7.1 This Location at the corner of Addiscombe Road and Shirley Road is an important local site en-route as a gateway into the Croydon Centre from Bromley via the busy A232 and as such requires a pleasant architecturally impressive and appealing vista. It is disappointing that the offered proposal does not meet this objective. The proposal is of a dominating character which has a cluttered façade which is unattractive and overbearing, having no relationship to the period of local surrounding building architecture.
- 7.2 The proposal exceeds the available **Site Capacity** of **0.0875ha** for the local Area Type at an **Outer Suburban** or **Suburban Setting** as defined by the **Nation Model Design Code** guidance. There is no equivalent guidance in the **Croydon Local Adopted or Revised (Dec 2021) Local Plan** or the **London Plan for Design Code Guidance** and therefore **NPPF para 129** is the authority for **Design Code Assessment**. **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.
- 7.3 If the Case Officer or the LPA disagree with our analysis or Design Code assessment of this proposal based upon the **National Model Design Code and Guidance**,⁸ we would respectfully request the Case Officer or the LPA Spatial Planning Team (LDF) to define the **alternative values** for **Design Code Area Types** or setting densities appropriate for this proposal.
- 7.4 The **Croydon Plan Growth** Policies are meaningless for assessment of proposals to determine acceptability of intensification in areas inappropriate for **“Focussed”** or **“Moderate” intensification** and similarly for area appropriate for **“Gentle” Intensification or densification** and thus it is impossible to professionally analyse or assess intensification/densification in accordance with the Policy.
- 7.5 The locality of the proposal is **NOT** in a designated area for Moderate or Focussed intensification as illustrated on the Policies Map. However, our analysis above, using the **National Model Design Code & Guidance** and an assessment for “Gentle” Intensification and the supporting analysis provides comprehensive evidence of overdevelopment of this proposal at this location indicating the **Site Capacity** is inadequate to support the development.
- 7.6 The proposal fails to meet the MINIMUM space Standards required as there is insufficient Site Capacity for Built-In Storage for any Residential Unit.
- 7.7 There is insufficient Play Space for the probable **12** Children of the families occupying the **9 Units** or any separate communal open space for the residents.
- 7.8 The Space Standards are a Minimum and should be exceeded, if possible, but the proposed Site Capacity would not allow these standards to be applied and therefore the proposal should be Refused on these grounds.
- 7.9 The Vehicular Access for the Addiscombe Road for Disabled Parking is hazardous if approaching from the Roundabout as the access is immediately after exiting the roundabout and requires crossing the line of traffic (Addiscombe Road (A232) and the

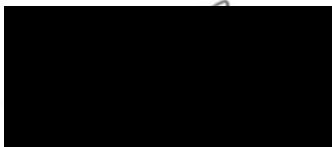
⁸ <https://www.gov.uk/government/publications/national-model-design-code>



- Pelican Crossing “zig-zag” markings and Red Line Parking restrictions. While waiting for a safe gap in the oncoming line of traffic, the stationary vehicle would cause further congestion and tailbacks from the roundabout and the traffic waiting to access the roundabout. Similarly, the Crossover for Access to the Residential Parking is across a Red Route and “zig-zag” markings for the Zebra Crossing.
- 7.10 We question the acceptability of “Dropped Kerbs” at locations close to junctions and at positions of “zig-zag” road markings at Pelican and Pedestrian crossings.
- 7.11 The illustration of probable ingress and egress swept Paths Parking trajectory, both for the Surgery Parking Bay and the Residential Parking from Shirley Road, are inaccurate, as the illustration only depicts the path of ONE axle which totally ignores the vehicles wheelbase, dimensions or bodywork overhang, front and rear. These illustrations are completely ineffectual and give a completely false sense of acceptability.
- 7.12 The foregoing analysis of the proposed development give sound and comprehensive reasons for the Case Officer to refuse this application. We therefore urge a refusal on the above-mentioned grounds.
- 7.13 We therefore urge the Case Officer to refuse this proposal on the grounds of Over Development for the Site Capacity as assessed in this submission and for the applicant to provide a revised application which fully complies with the current and adopted Local and National Guidance and Policies.

Kind regards

Derek



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Local affected Residents & Interested Parties