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**Monks Orchard Residents'
Association
Planning**

20th June 2022

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Reference:	22/01185/FUL
Application Validated:	Mon 21 Mar 2022
Address:	187 Shirley Road Croydon CR0 8SA
Proposal:	Conversion of the Property to 5 Self-contained Flats, the Construction of a Ground Floor Rear Extension and Associated External Alterations
Status:	Awaiting decision
Consultation Expiry:	Thu 26 May 2022 (Delayed, as first Floor Plans NOT provided until 15 th June)
Determination:	Mon 16 May 2022
Case Officer:	Christopher Grace

Dear Mr Grace

Please accept this letter as a formal objection to **Application Ref: 22/01185/FUL** for Conversion of the Property to 5 Self-contained Flats, the Construction of a Ground Floor Rear Extension and Associated External Alterations.

We appreciate that our representation is after the closing date for neighbour consultation but the delay in production was due to lack of supporting documentation showing the modified plans for the first-floor arrangement to provide two self-contained flats. As the supplied plans illustrated the existing arrangement, it was not possible to compile sensible comments on the proposal until plans of the first floor were provided as notified on 15th June 2022. We understand the need for additional housing Units, but that any conversion of existing family units to units of multiple occupation and Flats by 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.

1 The Proposed Parameters and Growth Policies:

1.1 We have had some difficulty in assessing the proposal based upon the offered Application Form. Initially our assessment was based upon the Site Area as provided on the Application form as 0.01ha. However, whilst analysing and assessing the parameters offered based upon this information, it became obvious that the stated Site Area was significantly in error. A subsequent estimate using Google Earth to obtain an approximate check produced a reasonable assessment that the applicant had made a significant error and instead of quoting 0.01ha should have quoted a site Area of ≈0.1 ha. **It is for this reason, and the delayed provision of first floor plans that our representation is delayed.**

1.2 Assessment of Site Area.



Google Earth Image showing estimated Site Area

1.3 The following table lists the important parameters of the proposal.

187 Shirley Road			Ref: 22/01185/FUL								
Site Area (***)	0.1	ha		Residential Density	150	hr/ha		PTAL	2011		2
Site Area (***)	100	sq.m.		Residential Density	110	bs/ha		PTAL	2021		2
Units	5			Housing Density	50	u/ha		PTAL	2031		2
Unit	Floor	Bedrooms	Plan Bedspaces (*)	Design & Access Bedspaces (**)	Habitable Rooms	GIA	GIA Required	In-Built Storage	In-Built Storage Required	Private Amenity Space Offered	Amenity Space required
Unit 1	Ground	2	4	4	4	77.2	70	Not Stated	2	>100	7
Unit 2	Ground	3	4	4	4	80	74	None	2.5	>100	7
Unit 3	First	1	2	1	2	40.5	50	None	1.5	None	5
Unit 4	First	1	2	1	3	44	50	None	1.5	None	5
Unit 5	Second	1	2	1	2	42.8	50	None	1.5	2.5	5
Total		8	14	11	15	284.5	294	0	9	2.5	29
(*) The Plans show two bedspaces i.e., (Double Beds 140cm x 190cm)											
(**) The Design & Access Statement accommodation list											
(***) Approximate Area as measured on Google Earth											

2 General Observations

2.1 It is noted from the design and access statement at para 10.6 that the Accommodation provides the following:

2.2 However, the provided **Plans** indicate that **Units 3, 4 & 5** have Beds of width $\approx 1.4\text{m}$ which accommodates **two individuals** (Double size Beds) which increases the occupancy capacity from 11 persons to **14 persons** (bedspaces). The capacity will therefore accommodate **14 persons**. If the proposed development is granted permission, the new occupants could then simply supply double beds to satisfy the additional requirement which would then **NOT** meet the minimum Space Standards.

Unit Number	Location	Size (m ²)	Number of Bedrooms	London Plan Minimum Space Standard (m ²)	+/-
Unit 1	Ground Floor	77.2	2 (4 person)	70	+7.2
Unit 2	Ground Floor	80	3 (4 person)	74	+6
Unit 3	First Floor	40.5	1 (1 person)	37	+3.5
Unit 4	First Floor	44	1 (1 person)	37	+7
Unit 5	Second Floor	42.8	1 (1 person)	37	+5.8

- 2.3 We have therefore based our submission on the increased occupancy of 14 persons as indicated on the offered plans.
- 2.4 A result of this assessment is the increased requirement of **Gross Internal Area** as defined by **London Plan Policy H6 Table 3.1**, which would require **50 sq.m. GIA** for **Units 3, 4 & 5**. Therefore Units 3, 4 & 5 fail to meet the **Minimum Internal Space Standards** as required on the **London Plan Policy D6** Housing quality and standards, **Table 3.1**.
- 2.5 In addition, there is **NO Private Amenity Space** for **Units 3 and 4** where at least **5sq.m. per Unit** is required, and there is no additional **GIA** provided to compensate.
- 2.6 The proposal fails to provide the required **In-Built Storage** as defined by the London Plan minimum Space Standards Table 3.1. **Unit 1** provides under stairs Storage but does not quantify the area or **height restricted area** which contributes to the requirement of **2 sq.m.** The other Units 2 to 5 do not identify any **In-Built Storage** and are therefore non-compliant to table 3.1 minimum space standards requirement.

3 Parking

3.1.1 187 Shirley Road has PTAL 2. The Revised **Croydon Plan** parking policy at **DM30 Table 10.1** states that residential homes in areas with no controlled Parking Zones are allowed **0.75** spaces per unit for 1 & 2 bed roomed homes and **1-2 spaces** per unit for homes with **3** or more bedrooms

Unit	Bedrooms	Plan Bedspaces (*)	Croydon Plan Parking	London Plan Parking
Unit 1	2	4	0.75	0.75
Unit 2	3	4	2	1
Unit 3	1	2	0.75	0.75
Unit 4	1	2	0.75	0.75
Unit 5	1	2	0.75	0.75
Total	8	14	5	4

- 3.1.2 The **London Plan Residential Parking Policy T6.1** at **Table 10.3** indicates; For Outer London at PTALs 2 to 3 for 1 – 2 beds (occupants) require up to **0.75** spaces per Dwelling and for 3 or more beds (occupants) up to **1 space** per dwelling.
- 3.1.2 As the proposal offers 2 parking spaces, there needs to be **2 or 3 overnight overspill parking** into adjacent side roads. 187 Shirley Road is on the A232 dual carriageway with restricted parking RED Route and is therefore inappropriate for on-street parking. The nearest side street is Valley Walk, and overspill parking is already an inconvenience to residents of Valley Walk nearest to Shirley Road.



10 Summary and Conclusions

- 10.1 There is one reference at para 4.15 of the revised (2021) Croydon Local Plan of the London Plan Policy “**Design-Led Approach**” but nowhere does the revised Local Plan provide any guidance as to the assessment of the implementation methodology of the “**Design-Led Approach**” **Policy D3 or H2.**
- 10.2 There is confusion between the Design & Access Statement Schedule at Para 8 “Housing Type and Mix” and to provided Plans in that the accommodation schedule shows Unit 1 as 2b4. Unit 2 as 3b4p and Units 3, 4 & 5 to be 1b1p whereas the Plans show Units 3, 4 & 5 to have Bed sizes appropriate for two individuals (1.4m wide). This increases the occupation from 11 to 14 bedspaces and thus persons. As a consequence of this confusion, the Gross Internal Area (GIA) required increases from 37sq.m. to 59 sq.m. which the offered proposal does not now meet. Unit 3 GIA offered is 40.5 sq.m. Unit 4 GIA offered is 44 sq.m. and Unit 5 GIA offered is 42.8 sq.m.
- 10.3 In addition, the Unit 1 under stairs In-Built storage Space area is not stated and could be limited by height restriction and not meet the required 2 sq.m. Units 2 to 5 do not have any In-Built Storage capacity identified on the floor plans and therefore are NOT compliant to the London Plan D6 Table 3.1 requirement.
- 10.4 **Units 3 and 4** have NO Private Amenity Space provision in the form of Balconies or Terraces.
- 10.5 As the proposal offers 2 parking spaces, there needs to be **2 or 3 overnight overspill parking** on adjacent side roads. As Shirley Road is a major A232 dual carriageway with, restricted parking RED Route, it is inappropriate for on-street parking. The nearest side street is Valley Walk, and overspill parking is already an inconvenience to residents of Valley Walk nearest to Shirley Road.
- 10.6 The conclusion from this assessment is that the proposed development should be refused. Please register this representation as Monks Orchard Residents’ Association (Objects).

Kind regards

Derek



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MORA Executive Committee, Local affected Residents & Interested Parties