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**Monks Orchard
Residents' Association
Planning**

16th March 2023

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| | |
|-----------------------|--|
| Reference | 23/00579/FUL |
| Application Received | Sun 12 Feb 2023 |
| Application Validated | Wed 22 Feb 2023 |
| Address | 179 The Glade Croydon CR0 7UL. |
| Proposal | Change of use from single residential dwellinghouse (C3) to HMO (C4) |
| Status | Awaiting decision. |
| Consultation Expiry: | Thu 30 Mar 2023 |
| Determination: | Wed 19 Apr 2023 |
| Case Officer: | Christopher Grace |

Dear Mr Grace – Case Officer,

Please accept this letter as a formal objection to **Application Ref: 23/00579/FUL** for Change of use from single residential dwellinghouse (C3) to HMO (C4).

We understand the need for low-cost rental accommodation and therefore are hesitant to object to this proposal. However, there are a number of issues which we believe are important and deserve consideration before making a determination. HMO accommodation requires to be acceptable to both occupants, neighbours and local residents. Please accept our comment on the above proposal for conversion of the single residential dwelling bungalow **Type C3** to a house of Multiple Occupation **Type C4**.

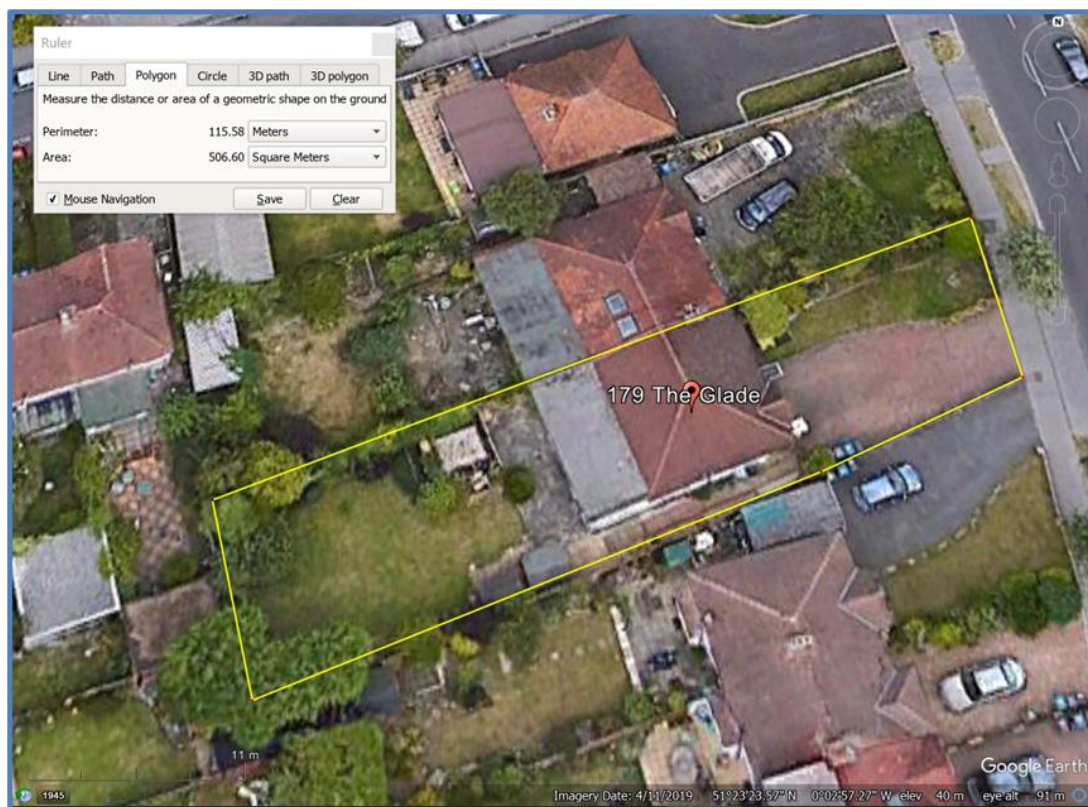
1 Initial Observations:

- 1.1 The parking arrangements are unsatisfactory as there is no possible method of exit without requiring a number of cars to be moved to allow any movement of another vehicle. This parking arrangement is totally unacceptable.
- 1.2 We are unaware of In-Built Storage requirements for HMO Type C4 accommodation if different from the London Plan Policy D6 Table 3.1. but are of the view that the proposal has insufficient.
- 1.3 There is no indication of Refuse, for capacity of bins, or cycle storage area to support the 8 (9) person occupants.
- 1.4 The Plans do not show whether the Shower rooms have WC's. The London Plan Housing Design Standards require two or more WCs for all dwellings with five or more Bedspaces. The proposal meets this requirement, but one is presumed within the bathroom shared by all occupants.

- 1.5 The Application Form at “Description of Proposal” requests:
- i. Has the Works or Change of Use already Started? Answer Yes.
 - ii. Has the Work or Change of Use been completed? Answer Yes.

Therefore, should this application be for “Retrospective” Planning Application rather than for Planning permission, or is it Change of Use with NO structural alterations which is already occupied by tenants and as such is already an HMO.

- 1.6 The Application Form indicates the Site Area at **145sq.m.** whereas the actual **Site Area** is **≈506.60sq.m. ≈ 0.05066ha** as measured on Google Earth.



Google Earth Image of 179 The Glade Site Area of 506.60sq.m. = 0.05066ha

2 Croydon Plan Policy

2.1 Croydon Plan Policy **DM10.1** States:

- 2.1.1 *“Where a conversion or house in Multiple Occupation is proposed, the Council will also consider the effects of “noise”, “Refuse Collection” and additional Car Parking on the character of an area. For this Reason, the Council will seek proposals to incorporate parking within the rear, to the side or underneath building.*
- 2.1.1.1 There are no proposals, mitigation or otherwise in the proposed documentation provided, to meet these requirements.
- 2.1.2 Para **6.58** refers to the recycling of existing plots with denser forms of development Without Significant impact on character by;

- a) Conversion – The conversion or subdivision of large buildings into multiple dwellings without major alteration to the size of the building.

3 Proposal's Parameters

| Application Details | | | |
|--------------------------------------|-----------------|----------|--------|
| Application Ref: | 23/00579/FUL | | |
| Address | 179 The Glade | | |
| PostCode | CR0 7UL | | |
| Consultation Close | | | |
| Parameters | | | |
| Site Area (ha) | 0.050660 | | |
| Site Area (sq.m.) | 506.60 | | |
| Units (Dwellings) | 1.00 | | |
| Bedrooms | 5.00 | | |
| Bedspaces | 8.00 | | |
| Habitable Rooms | 6.00 | | |
| Occupancy / Unit | 8.00 | bs/Unit | |
| Housing Density | 19.74 | Units/ha | |
| Residential Density | 157.92 | bs/ha | |
| Residential Density | 118.44 | hr/ha | |
| | | Min | Max |
| Area Type Setting (Units/ha) | <Outer Suburban | 0.00 | 20.00 |
| Area Type Setting (Bedspaces/ha) | Urban | 141.60 | 283.20 |
| | | U/ha | bs/ha |
| PTAL (Current) | 1.33 | 73.30 | 172.99 |
| PTAL (Forecast) | 1.33 | 73.30 | 172.99 |
| PTAL Require for Residential Density | 2.81 | | 157.92 |
| Gentle Intensification | <Outer Suburban | 6.67 | 188.80 |
| Moderate Intensification | <Outer Suburban | 13.33 | 236.00 |
| Focussed Intensification | <Outer Suburban | 20.00 | 283.20 |

Table of Application parameters for assessment

3.1 National Model Design Code & Guidance

- 3.1.1 The **National Model Design Code & Guidance** Area Types are stated as “**Outer Suburban**” 20 to 40 Units/ha, “**Suburban**” 40 to 60 Units/ha, **Urban** 60 to 120 Units/ha and **Central** 120 Units/ha & above only limited by **London Plan Policy D6 - Minimum Internal Spaces Standards**. However, this proposal has **Site Area** of **≈506.60sq.m. (Google Earth) = 0.05066ha** which for one Unit equates to a **Housing Density** of **19.74Units/ha** which is **less than** the “**Outer Suburban**” minimum. i.e., **<Outer Suburban** Range between **Zero to 20 Units/ha** or **Residential Density Zero to 47.20 bs/ha. (using the National Average occupation of 2.36 persons per Unit)¹**.

3.2 Housing Density (Application Form)

- 3.2.1 The Housing Density is unchanged at one Unit on a Site Area of **≈506.60sq.m. = 0.05066ha**. at **19.74Units/ha**. This is **NOT** as stated on the **Application Form** i.e., **145 sq.m. = 0.0145ha = 68.97Units/ha**.

3.3 Residential Density

- 3.3.3 The floor plans list the areas of each bedroom and therefore it is possible to establish the occupant capacity from the available floor space as given in the London Plan Guidance (LPG) – Housing Design Standards.

3.3.4 London Plan Policy D6 Housing quality and standards

¹ <https://www.statista.com/statistics/295551/average-household-size-in-the-uk/>

a) A dwelling with two or more bedspaces must have at least one double (or twin) bedroom that is at least 2.75m wide. Every other additional double (or twin) bedroom must be at least 2.55m wide.

b) A one bedspace single bedroom must have a floor area of at least **7.5 sq.m.** and be at least **2.15m** wide.

c) A two bedspace double (or twin) bedroom must have a floor area of at least **11.5 sq.m.**

| 179 The Glade | | | 23/00579/FUL | |
|-----------------------|--------------|---------|--------------------|------------------------------|
| Bedroom Accommodation | | | | |
| Site Area | 506.6 | sq.m. | PTAL 2021 | 1b ≡ 1.33 |
| Site Atea | 0.05066 | ha | PTAL 2031 | 1b ≡ 1.33 |
| Bedroom | Area (sq.m.) | Bed (*) | Probable Occupants | Max Occupants (LP Policy D6) |
| 1 | 12 | Double | 2 | 2 |
| 2 | 12 | Double | 2 | 2 |
| 3 | 10 | Single | 1 | 1 |
| 4 | 11 | Double | 2 | 1 |
| 5 | 29 | Double | 2 | 2 |
| Totals | | | 9 | 8 |

3.3.5 Therefore Beds 1 & 2 at **12 sq.m.** accommodate **double** beds, but Bedrooms 3 & 4 are **<11.5sq.m.** which should only accommodate **1** (one single bed). **Bed 5** can easily accommodate a double bed at **29sq.m.** This provides an official **Residential Density** of $8/0.05066 = 157.92$ **bedspaces/ha**

3.3.6 However, the probable accommodation as shown on the plans show only bedroom three having a single Bed, all others show a double bed which is $9/0.05066 = 177.66$ **bedspaces/ha.** (Not as defined by the applicant's **Application Form Site Area** of **145sq.m.**).

3.3.7 If measured by **Habitable Rooms per hectare**, there are **6 habitable** rooms therefore the **Residential Density** would be $6/0.05066 = 118.44$ **hr/ha.** However, the **Habitable Rooms per hectare (hr/ha)** Density is an inappropriate parameter as habitable rooms do not require supporting infrastructure or any other requirement, and as such is an *irrelevant* parameter.

3.4 Living/Kitchen/Dining Space requirement

3.4.1 The **London Plan Guidance (LPG) – Housing Design Standards** at Section **C2.4 Policy D6** provides floor space capacity requirements to be met or exceeded for incremental increase in occupants from **1 person** incrementally for each additional person starting at **21sq.m.** and increasing by **2 sq.m.** for every additional person.

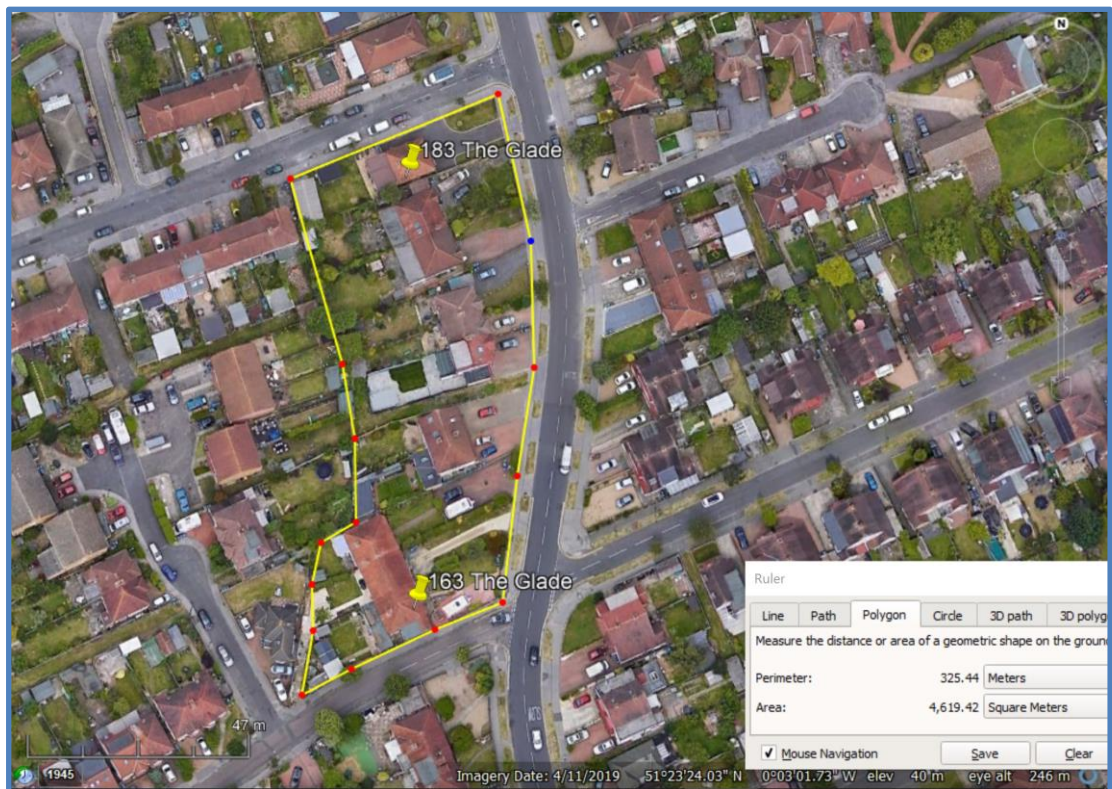
3.4.2 Thus, for an **HMO** with occupancy of **8 (or 9) persons**, the combined **Living, Kitchen, Dining** space should be equal to or greater than $21+2*7=35$ **sq.m** (or $21+2*8=37$ sq.m.). The proposal does not indicate the Kitchen Area, and only offers the Living/dining area of **18sq.m.** **Therefore, the requirement for 8 (or 9) persons is not available from the supplied information.** (It is not thought the Kitchen area is $\Rightarrow 17$ sq.m. which if so, would result in **non-compliance**).

4 Local Design Code

4.1 The local Area Type Setting requires a defined area for assessment and the most obvious local area is the **Post Code** of the locality at **CR0 7UL.**

4.2

The Post Code Area **CR0 7UL** extends from **163 to 183 (odds) The Glade**² (11 Units) and has **23 Occupants**³ in an Area of **4619.42 sq.m.** (Google Earth).



Google Earth Image covering Post Code Area CR0 7UL

4.3

The following simple excel interactive spreadsheet provides an assessment of **Post Code Design Code** parameters on the input of the basic **Post Code** information. The **Post Code CR0 7UL** embraces the area from **163 to 183 the Glade** and includes **11 Dwellings** housing **23 Occupants** (Last updated on 12 March 2023).

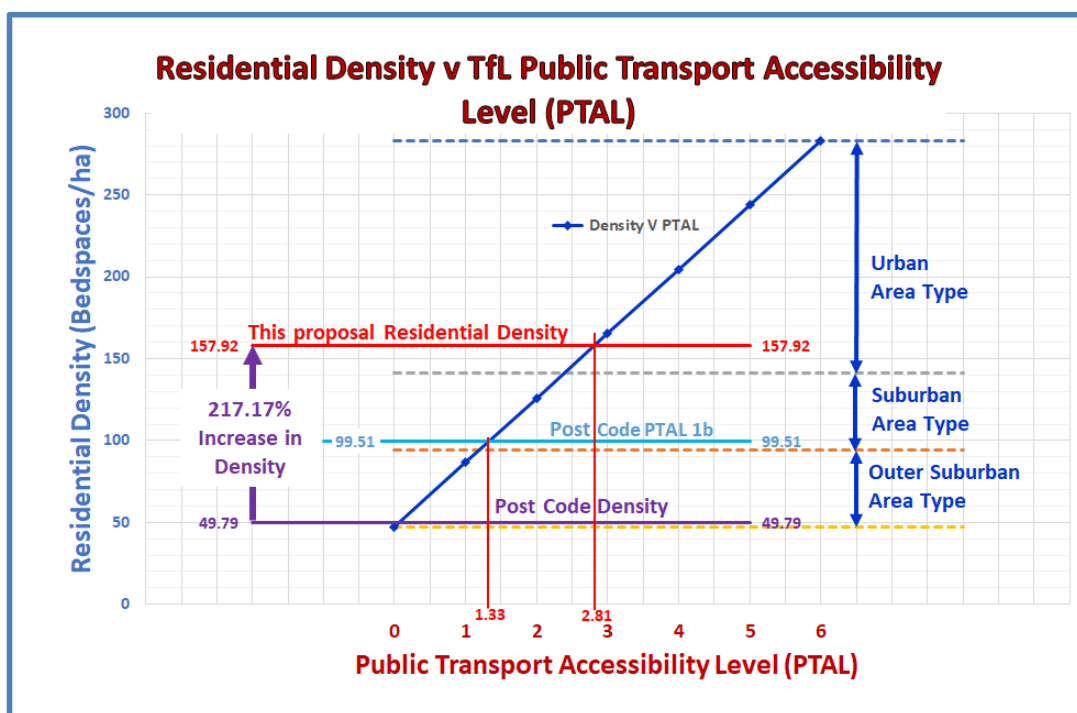
| Parameters of Post Code Design Code | | | | | |
|--|----------------|------------------|-------|------------------------|---------------|
| Area Design Code Parameter (These parameters auto calc Design Code) | | Input Parameters | | Constrains | |
| Post Code | CR0 7UL | | | Ward | Shirley North |
| Area of Post Code (ha) | 0.461942 | hectares | | Flood Risks | 100yr Surface |
| Area of Post Code (Sq.m) | 4619.42 | sq.m. | | Gas Pressure | Low Pressure |
| Number of Dwellings (Units) | 11 | Units | | Water Pressure | N/A |
| Number of Occupants (Persons) | 23 | Persons | | HASL (m) | 39m |
| Occupancy / Unit | 2.09 | persons/Unit | | Building Line Set-Back | 7m to 14m |
| Post Code Housing Density | 23.81 | Units/ha | | | |
| Post Code Residential Density | 49.79 | Bedspaces/ha | | | |
| Area Type (National Model Design Code) | Outer Suburban | Setting | | | |
| Design Code Parameters | | Min | Max | Measure | |
| Area Type (Outer Suburban, Suburban or Urban) | Outer Suburban | 20 | 40 | Units/ha Range | |
| Equivalent Residential Density (Persons/ha) | Outer Suburban | 47.20 | 94.40 | Persons/ha Range | |
| | | U/ha | bs/ha | | |
| Gentle Intensification (Limits in U/ha & bedspaces/ha) | | 26.67 | 62.94 | Limits Intensification | |
| Moderate Intensification (Limits in U/ha & bedspaces/ha) | | 33.33 | 78.66 | Limits Intensification | |
| Focussed Intensification (Limits in U/ha & bedspaces/ha) | | 40.00 | 94.40 | Limits Intensification | |
| PTAL (now) | 1.33 | 42.17 | 99.51 | Limits for PTAL | |
| PTAL (forecast 2031) | 1.33 | 42.17 | 99.51 | Limits for PTAL | |

Interactive spreadsheet for Design Code Assessment of Post Code CR0 7UL

² <https://www.gov.uk/government/organisations/valuation-office-agency>

³ <https://www.postcodearea.co.uk/>

- 4.4 The indication is that the **Post Code CR0 7UL Area Type** Setting to be **“Outer-Suburban”** as defined by the **National Model Design Code & Guidance**. The location is not included for **“Moderate”** or **“Focussed”** Intensification on the **‘Policies Map’** and therefore the allowable evolutionary growth is defined in the **Croydon Local Plan** as **“Gentle”** **Densification** which we estimate to be appropriately **26.67Units/ha** or **62.94 bedspaces/ha** for the **Post Code Area** to ensure **infrastructure support** and **sustainability**.
- 4.5 As the Locality has **PTAL 1b**, which is assumed numerically equivalent to **1.33** for assessment purposes and is forecast to remain at **1b** up to 2031, the appropriate **Residential Density** appropriate for **PTAL 1b \equiv 1.33** is calculated as **47.171Units/ha** or **99.51bedspaces/ha** for the **Post Code Area Design Code** which would exceed the support of the current **Residential Density** of the **Post Code Area**.
- 5.1 **TfL Density Ranges & PTAL compared to National Model Design Code Densities**
- 5.1.1 **TfL Public Transport Accessibility** should incrementally increase with the increase of local **Residential Occupancy** irrespective of the **Area Types**. Therefore, the incremental increase from **PTAL Zero** from the lowest Density at **Outer Suburban Area Type** to **PTAL 6** at the Maximum or an **Urban Area Type** should be linear.
- 5.1.2 As the **National Model Design Code** Guidance is based upon **National values**, we can convert the **Housing Density** to **Residential** occupancy based upon the **‘National’** figure for Unit Occupancy as defined by the NOS or Statista.⁴ The conversion factor is **2.36 persons per Unit** (2021).



The Graphical illustration of Residential Density of 157.92 Bedspaces/ha (for occupancy of 8 Persons at Site Area of 5067.60ha and PTAL of 1b \equiv 1.33 for TfL and National Model Design Code Area Types.

⁴ <https://www.statista.com/statistics/295551/average-household-size-in-the-uk/>

5.1.3

The proposals Design Code Area Type and acceptability is assessed by comparison with the Design Code Area Type of the locality as defined by the local Post Code.

| Difference Between Post Code (CR0 7UL) Design Code & Application Proposal | | | | |
|---|--------|-------------------|-----------------|--|
| Post Code Housing Density (Units/ha) | 23.81 | Area Type Setting | Outer Suburban | |
| Application Housing Density (Units/ha) | 19.74 | Area Type Setting | Outer Suburban | |
| Difference | -4.07 | # | | |
| Percentage Difference (%) | -18.69 | % | | |
| Percentage Increase (%) | -17.09 | % | | |
| Post Code Residential Density (bs/ha) | 49.79 | Area Type Setting | <Outer Suburban | |
| Application Residential Density (bs/ha) | 157.92 | Area Type Setting | Urban | |
| Difference | 108.13 | # | | |
| Percentage Difference (%) | 104.12 | % | | |
| Percentage Increase (%) | 217.17 | % | | |
| PTAL Currently Available | 1.33 | <Outer Suburban | | |
| PTAL Required | 2.81 | Urban | | |

Table of comparison between Post Code Design Codes & Proposal Design Code parameters

5.1.4

The above table illustrates the difference in Area Type Settings of the local Post Code CR0 7UL for the proposal and the actual Design Code Assessed for the proposal. There is minimum difference in the Housing Density but there is a significant difference between the Residential Density of the local Post Code Area at **59.79 bs/ha** to the proposed application at **157.92 bs/ha** which changes the required Area Type from **Outer Suburban**, through **Suburban** to an **Urban Area Type** Setting Design Code.

5.1.5

In addition, the proposal would require a supporting **TfL PTAL** of **2.81** when the locality has **TfL PTAL** of just **1b ≡ 1.33** which is forecast to remain at **1b** until 2031.

6

Summary & Conclusions

6.1

Article 4 Direction

6.1.1

Croydon Council introduced an Article 4 Direction on 28 January 2020 to protect family homes (houses and flats) by requiring planning permission to convert these properties into small houses of multiple occupation (HMOs). The Article 4 Direction was confirmed to come into place on 28 January 2020, a year after it was first made. It is understood that the Article 4 Direction applies to the whole borough.

6.1.2

The Article 4 Direction Schedule:

“Development consisting of a change of use of a building and any land within its curtilage from a use falling within Class (C3) (Dwellinghouses) of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended) to a use falling within Class C4 (Houses in multiple occupation) of that Schedule, being development comprised within Class L(b) of Part 3 of Schedule 2 to the GDPO and not being development comprised within any other Class.”

6.2

It is recognised that conversion of dwellings (C3) to a House of Multiple Occupation (C4) provides much needed accommodation for youngsters starting out in their working lives. These conversions are therefore a source of housing supply which can help to fill that need. However, there are policies to ensure the accommodation is suitable which we have tried to adequately capture in our submission to assist the assessment by the Case Officer.



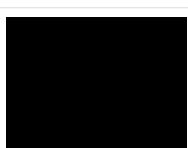
- 6.3 There is also a critical balance required when assessing a proposal for conversion of family dwellings from C3 to C4 HMO usage on the affects and relationship with adjoining neighbours and the locality generally, to ensure continued neighbourly cohesion and to ensure the neighbourhood does not degenerate toward deprivation.
- 6.4 Resulting on our detailed assessment, we hold the view that this proposal is a loss of a family dwelling and as a result of an assumed occupancy of 8 (possibly 9 persons (bedspaces), provides inadequate facilities for the possible number of future occupants and therefore the proposal as offered should be refused.
- 6.5 Please publish our objection on the Public Access Register as **Monks Orchard Residents' Association (Objects)**.

Kind regards

Derek



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Monks Orchard Residents' Association.
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Cc:

Cllr. Sue Bennett

Cllr. Richard Chatterjee

Cllr. Mark Johnson

Shirley North Ward

Shirley North Ward

Shirley North Ward

Bcc:

MORA Executive Committee, Local affected Residents & Interested Parties