

To: Mr Christopher Grace - Case Officer
Development Environment
Development Management
6th Floor
Bernard Weatherill House
8 Mint Walk
Croydon
CR0 1EA

From:
Monks Orchard Residents' Association
Planning

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25th January 2019
Emails: planning@mo-ra.co
chairman@mo-ra.co hello@mo-ra.co

Reference: 18/06070/FUL
Application Received: Mon 17 Dec 2018
Application Validated: Mon 17 Dec 2018
Address: 9A Orchard Rise Croydon CR0 7QZ
Proposal: Demolition of the existing house and office and erection of a two-storey apartment comprising 4no. two-bedroom apartments and 5 three-storey, three-bedroom houses, together with associated access and parking.
Case Officer: Christopher Grace
Consultation Close: Wed 30 Jan 2019

Dear Mr Grace

ADDENDUM App Ref: 18/06070/FUL

We would appreciate acceptance of this **Addendum** to our earlier submission sent to Development Management on **10th January 2019** and recently registered on the public register. This Addendum should be read **IN CONJUNCTION** with the **MORA** submission dated **10th January as additional reasons for a refusal.**

Current Croydon Local Plan Policy:

Policy DM29: Promoting sustainable travel and reducing congestion

To promote sustainable growth in Croydon and reduce the impact of traffic congestion development should:

- a. Promote measures to increase the use of public transport, cycling and walking;
- b. Have a positive impact and must not have a detrimental impact on highway safety for pedestrians, cyclists, public transport users and private vehicles; and
- c. Not result in a severe impact on the transport networks local to the site which would detract from the economic and environmental regeneration of the borough by making Croydon a less accessible and less attractive location in which to develop.

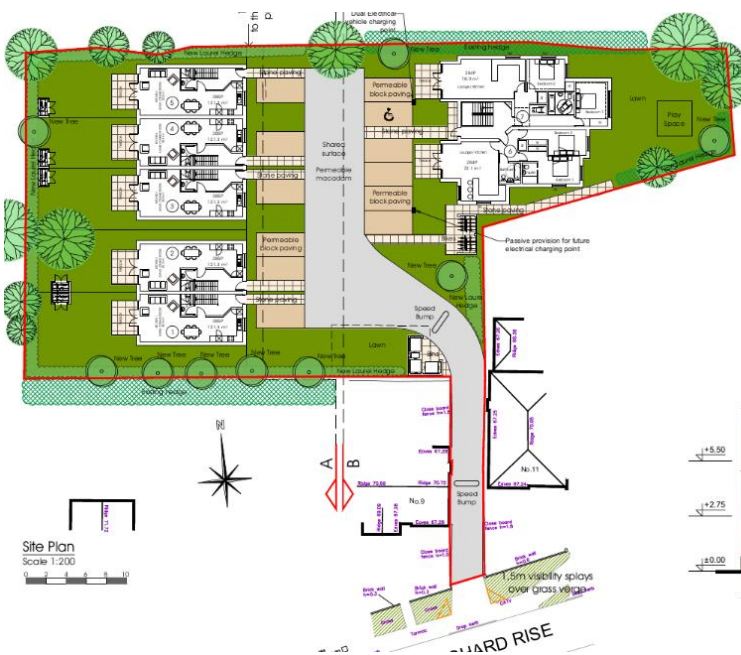
10.29 All development has an impact on traffic movement in the borough. In order to reduce the impact on traffic movement the Council will require new development to promote measures to increase the use of public transport, cycling and walking. This includes ensuring new development has good access to public transport and has good links to main pedestrian and cycle routes in the

borough. The design of new developments should prioritise walking and cycling routes into and through developments over routes for cars. Designs should also prioritise access to public transport over accessibility to private motor cars.

10.30 Some development would result in a **severe impact on the local transport networks. Such development will not be permitted.** Transport for London and Network Rail will be consulted on planning applications that could result in such an impact on the borough.

10.32 The extent of the local road network will vary depending on the location, scale and type of the development but will **always include the routes from the development site to the Strategic Road Network.** For developments located on a Strategic Road the local road network will include the entire Strategic Road Network within and leading into the borough.

10.33 The extent of the local public transport network **includes bus routes within a 10-minute walk, tram routes and train stations within a 15-minute walk and cycle and walking routes within 15 minutes of the development.** The exact extent of the local transport networks should be considered in the Transport Assessment.



The access road to the proposed site is via **Orchard Rise** which is **width ≈5m** and length **≈105m** from the **Orchard Avenue/ Orchard Way intersection** and thence via a **narrow driveway** of width **≈3m** and length of **≈28m** to a **blind corner** onto the site.

This access to the road network is **severely restrictive** for the volume of traffic from/to the site on a **daily basis**. The Site Parking provision is for **12 cars for 41 occupants** which, although meeting parking policy, is **unlikely to be sufficient** and result in **overspill on-street parking** in **Orchard Rise**, especially if any occupants have **commercial**

vehicles for their occupation(s). The parking on site does not provide adequate turning head for delivery vehicles. Heavy goods vehicles would not have sufficient safe clearance after kerbs have been laid and fencing erected along the **≈3m wide driveway** and could result in difficult reversing required if two vehicles in opposite direction of travel were to enter the driveway from either end.

There would be insufficient clearance for **pedestrians** or persons with **pushchairs** when a vehicle was entering or exiting from the site, and, as previously stated emergency vehicles and Fire Tenders could not gain access to the site in the case of any emergency. Refuse collection vehicles would have extreme difficulty gaining access and would not have adequate space to turn around and exit in a forward gear.

Therefore, the proposed development does **NOT** meet Croydon Local Plan **Policy DM29 Promoting sustainable travel and reducing congestion**, as the proposal does **NOT** have good access to public transport **DM29 a)**. Has a detrimental impact on **highway safety for**

pedestrians, cyclists, public transport users and private vehicles **Policy DM29 b)**; and will result in a **severe impact on the transport networks local to the site**, which results in a less accessible and less attractive location in which to develop, **Policy DM29 c)**. and para **DM29 para 10.30 & para 10.32**.

Policy DM30: Car and cycle parking in new development

To promote sustainable growth in Croydon and reduce the impact of car parking new development must:

- a. **Reduce the impact of car parking** in any development located in areas of good public transport accessibility⁹⁷ or areas of **existing on-street parking stress**;
- b. Ensure that the movement of **pedestrians, cycles, public transport and emergency services is not impeded by the provision of car parking**;
- c. Ensure that highway safety is not **compromised by the provision of car parking including off street parking** where it requires a new dropped kerb on the strategic road network and other key roads identified on the Policies Map;
- d. If the development would result in the loss of existing car parking spaces, demonstrate that there is no need for these car parking spaces by reference to occupancy rates at peak times;
- e. Provide car and cycle parking spaces as set out in Table 10.1;
- f. Ensure that cycle parking is designed so that it is secure and can also be used for parking for mobility scooters and motor cycles; and

Provide car parking for affordable homes at an average rate not less than 2/3 that of other tenures.

10.41 It is recognised that sustainable growth of the suburbs will take place over the whole Plan period and that **in the early years** the public transport infrastructure necessary to support that growth **may not exist in all areas with a low Public Transport Accessibility Level of 0, 1a or 1b**. Therefore, in the early years of the Plan, **it may therefore be acceptable for an increased provision of private car parking to be provided in developments in areas with a low Public Transport Accessibility Level** if justified by a Transport Assessment. The Transport Assessment needs to demonstrate that the public transport provision will not be sufficient to service the development within the first three years following granting of planning permission, that it is not reasonable to walk or cycle to the nearest railway station, and that there is no interest from car clubs in operating from the location at the time planning permission is sought.

The proposed development application does NOT include a Transport Assessment and has expressed an illogical assessment of traffic movements comparable with existing (2 occupants compared to 41 occupants) in the offered Design and Access Statement. The local overflow on-street parking has **significantly increased in Orchard Rise** since the redevelopment at **Hanbury Mews** (previously 68-70 Orchard Avenue) which has caused increased on-street parking and congestion in **Orchard Rise** with an increase in minor accidents resulting from **inappropriate on-street parking**. Any further increased on-street parking resultant on the proposed development at **9a Orchard Rise** will exacerbate this already unacceptable situation. Therefore, the proposed development is **non-complaint to Policy DM30 a). & c)**.

With the increased recent developments resulting in **additional cumulative** increase in local population (**280 bed-spaces, including the 41 bed-spaces proposed at 9a Orchard Rise**), and at low **PTAL at 1a** and forecast to remain at **1a until 2031**, the local **367 Single Decker Bus** route is becoming **increasingly unreliable** and **significantly congested**. The increased **Residential Density** without increased **public transport accessibility** is becoming **unmanageable and therefore non-compliant to Policy DM30 para 10.41**.

Conclusions:

In addition to the reasons as documented in our **objection letter dated 10th January**, we therefore provide additional reasons to object to this proposed development on grounds of it being **inappropriate for the location** and **Non-Compliant to Policy DM29: Promoting sustainable travel and reducing congestion sub Policies DM29 a), b & c) and Paras 10.29 to 10.33. and Policy DM30: Car and cycle parking in new development and DM30 Para 10.41**.

We therefore request a **refusal** for this application for the reasons set out in our **objection letter of 10th January** and **additionally** for the **foregoing reasons** set out in this **Addendum**.

Please acknowledge receipt of this formal objection and that it has been received within the **appropriate consultation period** for this application, to email address at.planning@mo-ra.co

Please register our comment as: **Monks Orchard Residents' Association (Objects)** on the comments tab of the **LPA online public register** such that our members are aware that we have objected on their behalf. Please inform us of your recommendation and decision in due course.

Yours sincerely

Derek C. Ritson - I. Eng. M.I.E.T. (MORA Planning).
Endorsed and approved by the MORA Executive Committee

Cc:

Sarah Jones MP	Croydon Central
Mr. Pete Smith	Head of Development Management (Croydon LPA)
Cllr. Gareth Streeter	Shirley North Ward Councillor
Cllr. Sue Bennett	Shirley North Ward Councillor
Cllr. Richard Chatterjee	Shirley North Ward Councillor

Bcc:

MORA	Executive Committee
Local Affected Residents	