

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

**Monks Orchard Residents' Association
Planning**

2nd June 2020

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Reference	20/01997/FUL
Application Received	Fri 08 May 2020
Application Validated	Thu 14 May 2020
Address	67 Orchard Avenue Croydon CR0 7NE Alterations including demolition of existing garage; erection of a two storey side extension, a two storey rear extension, a loft conversion with roof lights in the front roof slope and dormers in the rear roof slope, the construction of balconies at first floor and second floor level, the construction of rear basement with terrace area and external staircase. The conversion of single dwelling into 6 flats; provision of car parking, refuse and recycling store, soft landscaping and new vehicular access onto Woodland Way.
Proposal	
Status	Awaiting decision
Case Officer	Russell Smith
Consultation close	Sat 13 Jun 2020

Dear Mr Smith

Please accept this formal letter of objection to the proposal **Ref: 20/01997/FUL** for Demolition of existing garage; erection of a two storey side extension, two storey rear extension, loft conversion with roof lights in the front roof slope and dormers in the rear roof slope, the construction of rear basement with terrace area and external staircase and alterations to the front vehicular access and boundary treatment. With the object of Conversion of single dwelling into **6 flats** – (3 x 1 bedroom flat and 3 x 2 bedroom flat); provision of car parking, refuse and recycling store, soft landscaping and new vehicular access onto Woodland Way, with hardstanding area at **67 Orchard Avenue**, CR0 7NE.

We should state that we are **NOT** against development or re-development in this area, but that we robustly object to developments that **do not reflect the character of the area** or meet the objectives as defined in the current adopted **Croydon Plan, The London Plan, the emerging London Plan and the NPPF** as they relate to the “**Shirley Place.**”

Especially as the cumulative yearly Target allocated dwellings for the “Shirley Place” (yearly allocations) have already been met in just the MORA Post Code Area!

Parameters Relevant to the amended proposal:

67 Orchard Avenue		Ref: 20/01997/FUL		Existing Dwellings		1									
SiteArea		0.07 ha		Existing Bedrooms		4									
	Floor	Bedrooms	Bed-Spaces	Habitable Rooms ⁽³⁾	GIA Provided (m ²)	Minimum GIA Table 3.1 New LP (m ²)	Kitchen Dining Living (m ²)	In-Built Storage Offered (m ²)	Built-in Storage Required Table 3.1 New LP (m ²)	Private Amenity Space Provided ⁽¹⁾ (m ²)	Private Amenity Space Required (m ²)	GIA + Private Amenity Space ⁽²⁾ (m ²)			
Flat 1	Basement	1	2	3	50.0	50	26.5	1.5	1.5	29.0	5.0	26.0			
Flat 2	Ground	1	2	3	50.0	50	24.6	1.9	1.5	0.0	5.0	55.0			
Flat 3	Ground	2	3	3	62.3	61	25.5	1.5	2.0	0.0	6.0	68.3			
Flat 4	First	2	3	4	68.4	61	29.4	nil	2.0	6.0	6.0	68.4			
Flat 5	First	1	2	3	50.0	50	23.7 ⁽⁴⁾	1.6	1.5	5.0	5.0	50.0			
Flat 6	Second	3	4	5	80.0	74	27.0	2.5	2.5	7.0	7.0	80.0			
Totals		10	16	21	360.7	346	133.0	9	11.0	47.0	34.0	347.7			
Residential Density		300.00 hr/ha		PTAL Required at Residential Density of 300 hr/ha =						5.33					
Housing Density		85.71 u/ha		PTAL Required at Housing Density of 85.71 u/hr =						5.02					
Average hr/unit		3.50 hr/u		Lightwell Amenity Area ⁽¹⁾		29m ² (overlooked)									
Residential Density		228.57 bed-spaces/ha		Private Amenity Space ⁽²⁾		GIA + Private Amenity Space; Policy DM10 para 6.76									
(3) Kitchen/Dining/Living Open Plan configuration - considered as two habitable Rooms (Kitchen a non-habitable room)															
Infrastructure:				Car Parking Spaces				6							
PTAL	2011	1b						0.375	spaces/occupant						
PTAL	2031	1b						1	Per Dwelling						

(2) Croydon Plan Policy DM10 para 6.76: In "**exceptional circumstances**" where site constraints make it **'impossible'** to provide **private outdoor space for all dwellings**, indoor private amenity space may help to meet policy requirements. The area provided should be **equivalent to the private outdoor amenity space requirement and this area added to the minimum Gross Internal Area**.

The **applicant** has **NOT** identified any "**exceptional circumstances**" of the proposed "**site constraints**" which prevents the provision of the "**Minimum**" Private Outdoor Private Amenity Space as defined by the **London Plan** and the **Croydon Local Plan**.

In-fill and re-developments should meet the minimum accommodation standards for future occupants, for the life of the development.

Table 3.1 Minimum internal space Standards for new dwellings ²⁵					
		Minimum gross internal floor areas and storage (Square Metres)			
	Number of Bed spaces (persons (p))	1 Storey dwellings	2 Storey dwellings	3 Storey dwellings	Built-in storage
1b	1p	39 (37)*			1
	2p	50	58		1.5
2b	3p	61	70		2
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3
	6p	99	106	112	

TfL Webcat	Accessing Transport Connectivity in London		
Setting	Public Transport Accessibility Level (PTAL)		
	0 to 1	2 to 3	4 to 6
Suburban	150-200 hr/ha	150-250 hr/ha	200-350 hr/ha (300.00 hr/ha)
3.8-4.6 hr/unit	35-55 u/ha	35-65 u/ha	45-90 u/ha
3.1-3.7 hr/unit (3.5 hr/unit)	40-65 u/ha	40-80 u/ha	55-115 u/ha (85.71 u/ha)
2.7-3.0 hr/unit	50-75 u/ha	50-95 u/ha	70-130 u/ha

PTAL required @ 300 hr/ha
 $300 = \left(\frac{350-200}{6-4}\right)x - 100 : x = PTAL \approx 5.33$

PTAL required @ 85.71 units/ha
 $85.71 = \left(\frac{115-55}{6-4}\right)x - 65 : x = PTAL \approx 5.02$

Planning History:

Reference	20/00092/FUL
Application Received	Thu 09 Jan 2020
Application Validated	Mon 13 Jan 2020
Address	67 Orchard Avenue Croydon CR0 7NE
Proposal	Demolition of existing garage; erection of a two-storey side extension, two storey rear extension, loft conversion with roof lights in the front roof slope and dormers in the rear roof slope, the construction of rear basement with terrace area and external staircase and alterations to the front vehicular access and boundary treatment. Conversion of single dwelling into 6 flats - 3 x 1 bedroom flat and 3 x 2 bedroom flat; provision of car parking, refuse and recycling store, soft landscaping and new vehicular access onto Woodland Way, with hardstanding area.
Status	Decided
Decision	Permission Refused
Decision Issued Date	Fri 20 Mar 2020

Reason(s) for Refusal:

- 1 The development would provide **Insufficient external amenity for Flat 4, 5, and 6**, by the way of lack of **private amenity space**, separate **play space** and lack of access through the building for these units to the amenity/play space. This would thereby conflict with **DM10** of the Croydon Local Plan, **Policy 3.5 of The London Plan**, The Nationally Described Space Standards 2015 and the **London Plan House Supplementary Planning Guidance 2016**.
- 2 The application fails to demonstrate that the development would provide **sufficient parking for a six-unit scheme**. The development would thereby conflict with **Policy DM30** of the **Croydon Local Plan 2018** and **London Plan Policies 6.12 and 6.13**.

The revised proposal does NOT provide adequate changes to overcome the reasons for refusal of the previous application.

Accommodation Standards:

London Plan Policy 3.5 - Quality and design of housing developments states:

A Housing development should be of the highest quality internally, externally and in relation to their context and to the wider environment, taking account of strategic policies in this Plan to protect and enhance London's residential environment and attractiveness as a place to live. Boroughs may in their LDFs introduce a presumption against development on back gardens or other private residential gardens where this can be locally justified.

B The design of all new housing developments should **enhance** the quality of local places, taking into account physical context; local character; density; tenure and land use mix; and relationships with, and provision of, public, communal and open spaces, taking particular account of **the needs of children, disabled and older people**.

3.36 The Mayor regards **the relative size of all new homes** in London to be a key element of this strategic issue and therefore has adopted the **Nationally Described Space Standard** ^[6]. **Table 3.3** sets out **minimum space standards** for dwellings of different sizes. **This is based on the minimum gross internal floor area (GIA)** required for new homes relative to the **number of occupants** and

taking into account commonly required furniture and the spaces needed for different activities and moving around. This means developers should state the number of **bedspaces/occupiers** a home is designed to accommodate rather than, say, simply the number of bedrooms. **These are minimum standards which developers are encouraged to exceed.**

	Number of Bed spaces (persons (p))	1 Storey dwellings	2 Storey dwellings	3 Storey dwellings	Built-in storage
1b	1p	39 (37)*			1
	2p	50	58		1.5
2b	3p	61	70		2
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3
	6p	99	106	112	

	Bedrooms	Bed-Spaces	(GIA)	built-In Storage
Flat 1	1	2	50	1.5
Flat 2	1	2	50	1.5
Flat 3	2	3	61	2
Flat 4	2	3	61	2
Flat 5	1	2	50	1.5
Flat 6	3	4	74	2.5

Comment #1.1:

From the forgoing analysis of the proposals parameters, it can be clearly demonstrated that this proposal fails to **fully** meet “**Minimum Accommodation Standards**” as defined by the current adopted and emerging London Plan Policies ^[1] which, if the proposal were to be approved, would be **extremely detrimental for future occupiers for the life of the development**. The policy states: **“These are minimum standards which developers are encouraged to exceed.”**

Comment #1.2:

Flat 2:

Failure to provide **any** Private Open Amenity Space or to identify “exceptional circumstances” why Private Open Space cannot be provided to meet the Private Open Space requirement which requires an increase in the allocation of Gross Internal Area (GIA) to compensate in (“**exceptional circumstances**”) for lack of Private Amenity Space as defined by the Croydon Plan Policy DM10 paragraph 6.76.

Comment #1.3

Flat 3:

Failure to provide **any** Open Private Amenity Space or to identify “exceptional circumstances” why Private Open Space cannot be provided to meet the Private Open Space requirement which requires an increase in the allocation of Gross Internal Area (GIA) to compensate in (“**exceptional circumstances**”) for lack of Private Amenity Space as defined by the Croydon Plan Policy DM10 paragraph 6.76.

Failure to provide adequate in-built storage space for 2b3p of 2m² required and only 1.5m² is offered.

[1] Draft London Plan – Consolidated Suggested Changes Version July 2019

Comment #1.4:

Flat 4:

Failure to meet the **minimum** required “built-In” Storage requirement as defined by the adopted London Plan Policy 3.5 Table 3.3 or the emerging London Plan Policy D4 Housing quality and standards for the life of the development. Flat 4 has **Zero in-built storage provided** when the **minimum** required in-built storage for 2b3p should be 2m² for normal family clutter.

The area of **Open Communal Amenity Space** is not specified as an allocation per occupant.

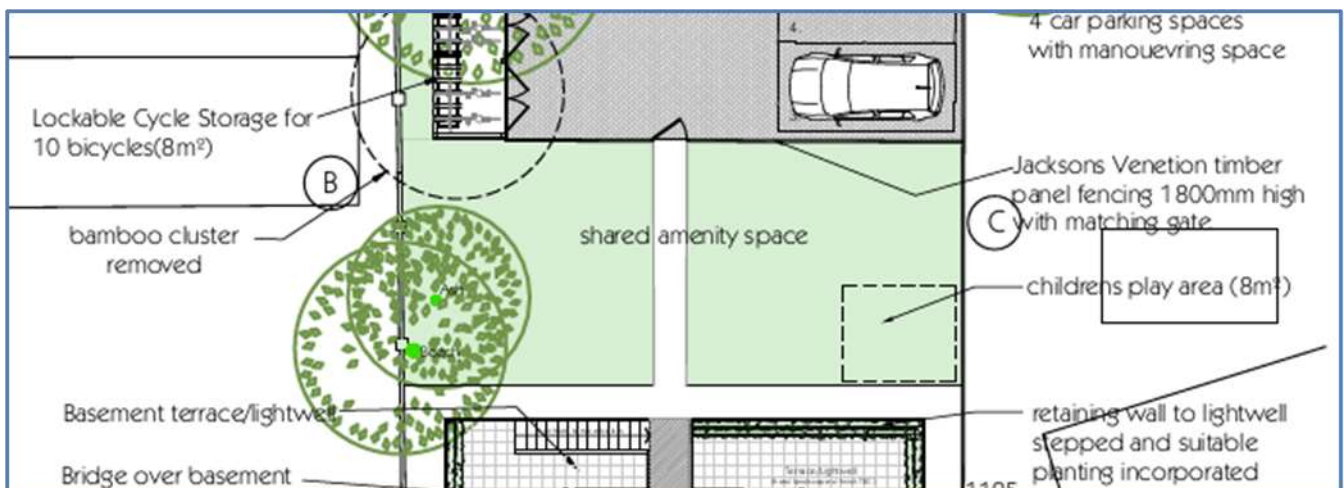
Comment #2.1:

The applicant has failed to provide the area of communal open amenity space such that it is not easy to calculate the area per occupant to establish its suitability or otherwise for the proposed number of occupants. It is **NOT** acceptable to require Objector’s to estimate or take scaled measurements from the offered drawings.

The London Plan and the emerging New London Plan (draft 2019) Para 5.4.5 requires Formal play provision should normally be made **on-site** and provide at least **10 square metres per child** to address **child occupancy and play space requirements** generated by a development proposal.

Comment #3.1

The Allocation of Play Space for children at 8m² for the likely 4 children of the occupants of this proposal would require 40m² and as such the 8m² is inadequate.



Residential & Housing Densities:

The **Current Adopted London Plan Policy 3.4 – Optimising Housing Potential** is set out below:

Policy 3.4 Optimising housing potential:

A Taking into account local context and character, the design principles in Chapter 7 and public transport capacity, development should optimise housing output for different types of location within the relevant density range shown in **Table 3.2. Development proposals which compromise this policy should be resisted.**

3.30 Where transport assessments other than PTALs can reasonably demonstrate that a site has either good existing or **planned public transport connectivity and capacity**, and subject to the wider concerns of this policy, the **density of a scheme** may be at the **higher “end” of the appropriate density range. Where connectivity and capacity are limited, density should be at the lower “end” of the appropriate range.** The **Housing SPG provides further guidance** on implementation of this policy in different circumstances including mixed use development, taking into account plot ratio and vertical and horizontal mixes of use.

Sustainable Densities:

This proposed development is on a site of area **0.07ha** and the **Residential Density** is given by habitable rooms per hectare = $21/0.07 = \underline{\underline{300hr/ha}}$.

The **Housing Density** is given by the number of dwellings per hectare = $6/0.07 = \underline{\underline{85.714u/ha}}$.

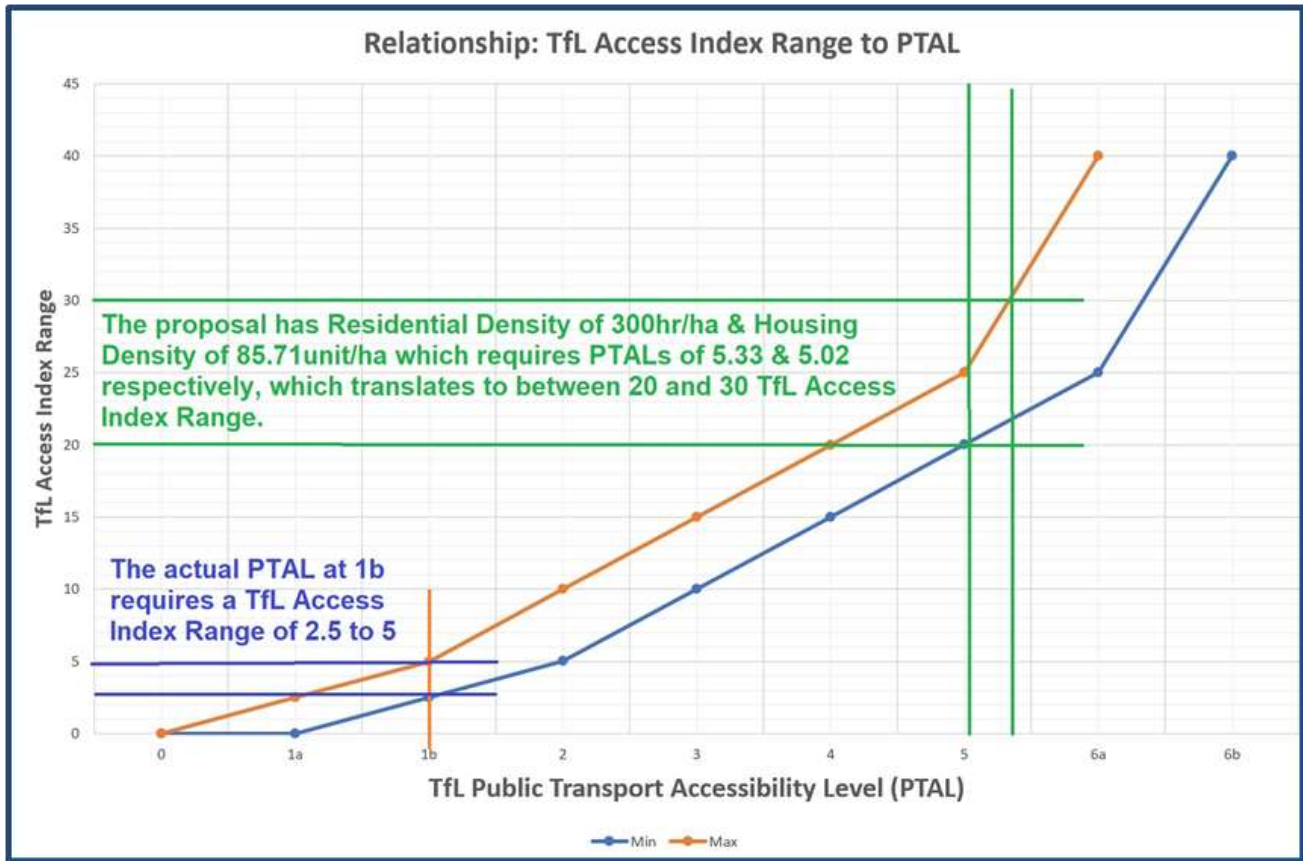
The **Average number of Habitable Rooms** per unit is total hr/ number of dwellings = $21/6 = \underline{\underline{3.5hr/unit}}$

The TfL WebCAT indicates this site at 67 Orchard Avenue to be PTAL1b and is forecast to remain at PTAL 1b up until 2031.

Table 3.2 Sustainable residential quality (SRQ) Density Matrix (habitable rooms and dwellings per hectare)			
TfL Webcat	Accessing Transport Connectivity in London		
Setting	Public Transport Accessibility Level (PTAL)		
	0 to 1	2 to 3	4 to 6
Suburban	150-200 hr/ha	150-250 hr/ha	200-350 hr/ha (300.00 hr/ha)
3.8-4.6 hr/unit	35-55 u/ha	35-65 u/ha	45-90 u/ha
3.1-3.7 hr/unit (3.5 hr/unit)	40-65 u/ha	40-80 u/ha	55-115 u/ha (85.71 u/ha)
2.7-3.0 hr/unit	50-75 u/ha	50-95 u/ha	70-130 u/ha
Urban	150-250 hr/ha	200-450 hr/ha	200-700 hr/ha
3.8-4.6 hr/unit	35-65 u/ha	45-120 u/ha	45-185 u/ha
3.1-3.7 hr/unit	40-80 u/ha	55-145 u/ha	55-225 u/ha
2.7-3.0 hr/unit	50-95 u/ha	70-170 u/ha	70-260 u/ha

PTAL	Access Index range	Map colour
0 (worst)	0	
1a	0.01 – 2.50	
1b	2.51 – 5.0	
2	5.01 – 10.0	
3	10.01 – 15.0	
4	15.01 – 20.0	
5	20.01 – 25.0	
6a	25.01 – 40.0	
6b (best)	40.01+	

Table 2.2: Conversion of the Access Index to PTAL



Comment #4.1:

At PTAL 1b in a **Suburban Setting** the appropriate **Residential Density** *should* be tending toward the higher end of the “*broad*” range of **150 to 200 hr/ha** whereas it is in the **highest “broad” range of 200 to 350hr/ha** requiring at PTAL in the **highest “broad” range** PTAL of 4 to 6.

Comment #4.2:

A Suburban Setting of PTAL 1b and average density of 3.5hr/unit The **Housing Density** should be tending toward the **high end** of the “*broad*” range of **40 to 65 units/ha**.

Comment #4.3:

A **Residential Density** of **300hr/ha** in a **Suburban** setting would require a **PTAL of 5.33** and an **Access Index of ≈25.2**.

Comment #4.4:

A **Housing Density** of **85.71 Units/ha** in a **Suburban** setting would require a **PTAL of 5.02** and an **Access Index in the range 20.01 to 25.0**.

Croydon Plan Review - Targets for Shirley (Place).

Ward	Target (2019 – 2039) 20 yrs.	Annual Average	9.687% Reduction (2019 – 2039)	Annual Reduced Target
Shirley	360 - 450	18 – 22.5	342 - 406	16.25 – 20.32 Average = 18.29

New Dwellings in the MORA Post Code Area of Shirley North Ward – (2019):

Location	Reference No.	Approval Date	Existing Dwellings	New Dwellings	Overall Increase
20-22 The Glade	18/05928/FUL	01/02/19	0	2	2
10-12 Woodmere Close	19/00051/FUL	27/02/19	0	1	1
9a Orchard Rise	18/06070/FUL	21/03/19	1	9	8
32 Woodmere Avenue	19/00783/FUL	20/06/19	1	7	6
18a Fairhaven Avenue	19/01761/FUL	20/06/19	1	9	8
17 Orchard Avenue	19/00131/FUL	06/11/19	1	8	7
56 Woodmere Avenue	19/01352/FUL	24/10/19	1	9	8
14-16 Woodmere Close	19/01484/FUL	23/10/19	0	1	1
37 Woodmere Avenue	19/03064/FUL	26/09/19	1	8	7
Totals 2019			6	54	48

Dwellings Approved in the MORA (Post Code Area) i.e. NOT all Shirley North Ward during 2019 = 48 which significantly exceeds the maximum yearly average target of 18.29 (i.e. an increase of 162.438% over the target) for the whole of Shirley i.e. Shirley North Ward & Shirley South Ward.

Percentage increase = (Increase - Original) × 100. = ((48 – 18.29)/18.29) × 100

Therefore, Percentage Increase ≈ 162.438%

Similarly, for 2020 so far:

Location	Reference No.	Approval Date	Existing Dwellings	New Dwellings	Overall Increase
151 Wickham Road	19/04149/FUL	18/03/20	0	5	5
16-18 Ash Tree Close	19/04705/FUL	27/02/20	2	8	6
67a Orchard Avenue	20/00356/FUL	03/04/20	1	2	1
158 Wickham Road	19/03279/FUL	waiting	1	6	5
195 Shirley Road	19/06037/FUL	waiting	1	9	8
211 Wickham Road	20/00299/FUL	withdrawn	0	4	4
Totals 2020 (so far)			5	34	29

This gives an indication for 2020 approx. half year totals which already exceed the target.

The increase in number of dwellings by 29 far exceeds the full year (2020) target average of 18.29 for the whole of Shirley North Ward and Shirley South Ward (Shirley Place).

An increase percentage of $((29 - 18.29)/18.29) \times 100 = 58.557\%$ for just approaching half a year so far.

These do NOT include the “Brick by Brick” Developments in the Shirley Wards

Comment #5.1:

Can you confirm the number of approved dwellings during 2019 for Shirley North and Shirley South Wards in relation to the current yearly Target for 2019 and 2020?

Comment #5.2:

Why is the MORA Post Code Area being consistently targeted for in-fill and redevelopments exceeding the whole of yearly targets for the combined Shirley North & Shirley South Wards?

Comment #5.3

Why are The Shirley Wards in-fill and redevelopments exceeding their proportion of the whole of Croydon housing targets?

Summary

As there is now **NO PRESSURE** to meet **housing Targets** for **Shirley Wards** there is now no reason to place more **“weight”** on approvals than the **“weight”** afforded to **planning policies**.

Dwellings once approved, will provide living accommodation for future occupants for a significant number of years – for the life of the development – and therefore its approval should **ensure suitable minimum accommodation standards (or better than) for all future occupiers for the lifetime of the development.**

This proposal provides **inadequate Play Space for the Children** of the occupants of the proposed development.

This proposed development **fails to fully meet** those **minimum space standards** and should therefore be **refused** to allow the applicant to re-design the proposal to **at least meet** (and preferably exceed) those **minimum space standards** which are set to afford **future occupants appropriate living conditions for the lifetime of the development.**

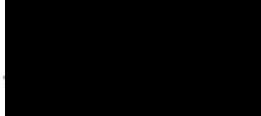
The existing and **future planned Infrastructure** has **NOT been evaluated in accordance with the emerging London Plan Policy D1A** and as such this proposed development is **unsustainable** when evaluated using currently available **TfL analysis information** as clearly set out above with respect to **Public Transport Accessibility Level – PTAL** and the corresponding **TfL Access Index Rating** and should therefore **be refused in accordance with the Policy.**

We therefore **strongly urge the LPA to robustly refuse this application** on the forgoing grounds as listed, **including any other relevant policies that we may have overlooked.**


Please register our submission on the on-line comments for this application as **Monks Orchard Residents' Association (Objects).**

Please inform us of your recommendation and decision in due course.

Yours sincerely



Derek C. Ritson - I. Eng. M.I.E.T. (MORA Planning).



Sony Nair – Chairman, Monks Orchard Residents' Association.
On behalf of the Executive Committee, MORA members and local residents.

Cc:

Ms Nicola Townsend	Head of Development Management (LPA)
Cllr. Gareth Streeter	Shirley North Ward Councillor
Cllr. Richard Chatterjee	Shirley North Ward Councillor
Cllr. Sue Bennett	Shirley North Ward Councillor

Bcc:

MORA Executive Committee
Local effected Residents