

Mr Pete Smith
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By e-mail from;
Riddlesdown Residents' Association
(Riddlesdownresidents@gmail.com)

9 July 2017

Dear Mr. Smith

122 Riddlesdown Rd, Purley – Application 17/02724/FUL

The Riddlesdown Residents Association (RRA), in whose area this application is sited, object to the proposal for the amended description of; “Demolition of one existing building: erection of a two storey building including basement and with additional accommodation in roofspace comprising of 2 x one bedroom flats, 4 x three bedroom flats and 2 x two bedroom flats: formation of associated access, and provision of 8 parking spaces, cycle storage and refuse store.”

Our reasons for this objection are;

- **Poor quality of information supporting the application;** as we have commented on before in respect of applications from this developer, the contents of the submitted Planning, Design & Access Statement (PDAS) contains several factual errors. It is drawn from documents used to support other schemes which contained similar errors. Examples of errors include:
 - 1.3.1 - *(the new building will be 4 storeys and not 3 storeys)* as shown in the table in this paragraph.
 - 2.1.4 - *(there is no large area called “Higher Drive Recreation Ground” near the site).*
 - 2.1.6 - *(the nearest direct bus stops are south of the site on Mitchley Ave).*
 - 2.1.7 - *(should read has a “low” PTAL rating of 1a and not “high”).*
 - 2.1.8 - *(Yes, it might be 1,000m from Purley & 1,500m Kenley railway stations but what about Riddlesdown station which is much closer?).*
 - 3.3.1 - *(the development will be over 4 storeys and not 2 storeys).*
 - 3.6.1 - *(again incorrect as 2.1.6).*
 - 4.2.2 - *(again incorrect as per 2.1.4!).*
 - 6.2.7 - *(this paragraph is irrelevant as it is a low PTAL rating and not a high one!).*
 - 6.3.8 - *(This sentence is incorrect because it is not a corner plot but with properties both sides; “relates to a corner plot by providing an active frontage onto both streets).”*
 - 6.3.18 - *(two streets? The site only fronts one street!).*
 - 6.3.19 - *(again this sentence is referring to a high PTAL rating!).*
 - 6.4.3 - *whilst the applicant might state the density of 238 hr/ha is slightly above the PTAL rating of 1a of 150 – 200 hr/ha, there are no comparable developments in this locality to support this figure. This statement is totally incorrect. The site does not have high accessibility. It is quite the contrary.*

6.5.3 – (3 storeys? New development is 4 storeys).

6.7.2 – (this sentence is not strictly correct bearing in mind the low 1a PTAL rating!).

6.7.4 (again this paragraph is incorrect with a low PTAL rating.)

7.1. – (incorrect with 2 storey building!).

The Council state on your website; *“In order to get planning permission from the Council we have to be convinced that your proposal has been well designed and will not cause any unacceptable impacts. In judging these two fundamental issues, we will be guided by the development plan...”* Our specific concern is that the PDAS does not provide sufficient clarity or accuracy in terms of the scheme’s approach to design, form, layout, access and off street car parking. The poorly worded PDAS inspires no confidence, and as submitted, we do not believe that the Council can make a judgement based upon it as to whether the scheme is well designed and will not have unacceptable impacts.

- **Number of storeys** - The Council’s and the developer’s description is misleading by referring to the scheme as a two storey building. At best, this is a misrepresentation, as this development will be 4 storeys high. There are windows and/or doors on each level and these will be visible on from all elevations - particularly at the front and rear. The front entrance door is at the lower ground level which is clearly visible from the street, and the three storeys above are also visible from the street by windows, including within the roof space.
- **Incorrect PTAL rating;** linked to above, the PDAS makes reference a number of times to a “high” PTAL rating. However, the TfL standard model indicates a PTAL rating for this part of Riddlesdown Rd of 1a, which is low.
- **Over intensification of the existing residential area;** Clause 6.4.2 of the PDAS refers to an indicative density range of 150 – 200 hr/ha. However, as this part of Riddlesdown Rd has a PTAL rating of 1a, the London Plan density matrix indicates that appropriate residential densities for suburban areas with this level of accessibility, are 150 - 200 hr/ha.

The proposed development of 238 hr/ha (Clause 6.4.3) is significantly above the density guidelines in the London Plan. Although we understand the density matrix is a tool to guide development, the scheme provides no evidence to support this level of intensification on Riddlesdown Rd. We believe that the scheme represents overdevelopment in terms of the immediate residential environment. There are no other flat developments nearby in this street, or adjoining streets, and the owner of No.122 has already reduced the size of this plot, by previously applying for and being granted planning permission, to build a new detached 5 bedroom house on the land in 2012 (12/00339/P). So in addition, there is now a proposal for 8 flats, immediately next to an already newly constructed detached house!

- **Bulk, scale and massing;** linked to the above, this application is for 8 flats and 18 bedrooms, compared to the eight by 2 bedroom flats (16 bedrooms) previously submitted by this applicant in February 2017, which we understand was withdrawn by the applicant because the Planning Officer considered it to be *“bulky and over developed nature, largely due to the width, size and proportion of the mass in relation to its context and neighbours”*. On this basis, we do not see how the Council can support this revised scheme given that the impact of the proposal in terms of bulk, scale and massing is likely to be greater than the withdrawn application
- **Detrimental impact upon residential amenity;** the proposal includes the demolition of the existing 2 storey building (including loft conversion) and garage and the erection of a four-storey detached building comprising of 8 x one, two and three bedroom flats. The application site sits midway between two other detached houses with the topography falling away substantially to the east.

Reflecting our previous comments, we are concerned that the scheme will have a detrimental impact upon the amenity of the surrounding residential area as:

- i) the rear elevation by virtue of its scale, bulk and massing, when combined with its prominent aspect, will create a dominant visual perspective which will sit uneasily with the surrounding inter-war properties.
 - ii) the scheme will be visible from the Green Belt vista of Purley Downs Golf Course creating a cramped and dominant perspective, when compared to the existing development on the site.
 - iii) there are no other 4 storey developments in the immediate locality. There are also no other flats within this street or adjoining streets. As such, the scheme is out of character with the existing streetscape.
 - iv) the taller, proposed new building will cause overshadowing to the property to the north (No. 120) for most part of the late morning/early afternoon, when the sun is at a southerly aspect.
- **Disability use** – Although there is now an internal lift, we note there is limited space for wheelchair use, especially in the bathrooms. The flats are also cramped.
 - **On site car parking** - We have concerns with the on-site parking layout and especially at the front of the development, rather than the rear, as in other recent applications by this developer. Although it may comply with the Council’s Plan, of one space per flat, the layout of the parking will be very difficult to enter and leave for a large/estate cars. Whilst the widths of the standard size parking bays of 2.4 metres are shown on plans, there is no indication on the plan of the length of each bay and whether they will be a minimum of 4.8 metres long. However the size of these bays are now considered to be insufficient for modern day larger vehicles and vans. There is some indication of vehicle length of 4.223 m in the detailed design review

document but this is not considered acceptable for larger vehicles to fit with 2.4 x 4.8m bays. There is no turning head and if the car park is fully utilised, it is most likely some vehicles will have to reverse out of the car park (and not using forward gear) onto the highway, rather than turning within the site, causing possible highway safety issues. There is also a vehicle/pedestrian conflict with the entrance to the building at the same level. The Croydon Plan Saved Policy UD13 requires parking to be safe, secure, efficient and integral to the design of a scheme. We believe the car park and pedestrian integration as designed, is unsafe. The disabled car parking space will be very difficult to manoeuvre into. Ideally disabled bays should be 3.6 metres wide. The applicant shows the bay at 3.3m wide, which is the bare minimum.

In the Croydon Local Plan (Clause 6.24 (page 66)); it states; *“Conversions of large residential properties and the use of front gardens for car parking can cause unacceptable harm to the setting of building and the character of the local area. For this reason, the Council will seek to support proposals to incorporate parking within the rear, to the side or underneath buildings.”* To have eight car parking spaces in the front garden will in our view have a detrimental harm on the appearance and setting of this proposed development.

- **On street parking** - Although there is provision for 1 car parking space per flat, we know from previous new flat developments locally that car ownership does not remain at one vehicle per flat, especially for two and three bed flat developments.

The Planning Officer, when reporting on the similar parking issue for 98 Hyde Rd by the same developer, made this statement in the Committee report: *“Whilst the London Plan allows greater flexibility for increased car ownership in parts of Outer London with low PTALs, this needs to be balanced against the impact of increased site coverage by hard surfacing and the need for communal amenity space and quality landscaping..... There is capacity for on street car parking in the vicinity of the site and in view of the likely occupancy of each of the flats; it might not necessarily be the case that each household would have more than one vehicle.”*

The Planning Department may consider that as Riddlesdown Rd has no yellow lining, that it is acceptable for vehicles and vans to park on the highway. However, there are a number of pieces of legislation that make parking of a vehicle on the highway (unless it is in a designated, marked parking bay), an offence. Under s.137 of the Highways Act 1980, it could be considered to be causing a wilful obstruction. Also under Regulation 103 of the Road Vehicle (Construction and Use) Regulations 1986, it is stated that no person in charge of a motor vehicle should cause their vehicle to stand on the road so as to cause an obstruction. Furthermore in Section 22 of the Road Traffic Act 1988 (as amended by the 1991 RTA), if a person in charge of a vehicle

causes it to remain at rest on a road in such a position or circumstances as to involve danger of injury to other persons using the road, then they will be guilty of an offence.

- **Parking/PTAL rating** - As the London Plan states, “In outer London, areas with low PTAL (generally PTALs 0-1), Boroughs should consider higher levels of provision, especially to address ‘overspill’ parking pressures.” None is proposed by the developer.
- **Local Distributor Road** - According to the Croydon Local Plan, Riddlesdown Rd is a local distributor road. This proposed development will probably add to congestion and parking, in particular on this street, especially where it narrows just south of the site. If a large vehicle is parked on this narrow section, it does make it extremely difficult for HGV’s, fire engines, refuse vehicles etc., to pass through the gap. In addition, visitors and delivery vehicles in respect to the proposal are likely to park on Riddlesdown Rd resulting in even greater congestion and blocked sight lines for vehicles emerging from this site and adjoining houses. Just where the highway narrows, it is also at a location, where the junction with the access road opposite (serving the properties built and being constructed at the rear of the Riddlesdown Ave properties) meets the highway. This service/access road is now being used more by vehicles from the occupants of houses already built, and in the process of being constructed, in the rear gardens of the Riddlesdown Ave properties (nine in total, with a potential for 29 dwellings) and they enter/leave opposite the site. The footway on the opposite side of the proposed site also ends here and is at a point where many pedestrians coming from Mitchley Ave, cross because of this. This same section is also the pedestrian crossing point to a Public Footpath (again opposite the site), to and from Riddlesdown Station and the shops; the route being frequented daily by schoolchildren and many elderly living in the area. In our view, any additional on street parking and traffic in this vicinity, **will** cause more highway/pedestrian safety issues.
- **Loss of family home** - This proposal would lead to the further loss of a family house, when there is already an acute shortage of decent large family homes in Croydon. The new development with greater and additional occupancy, will place additional strain upon the existing infrastructure (e.g. healthcare, hospitals, new road and rail infrastructure, water and improved drainage etc.), which are already unable to meet the needs of the existing population. The Council’s Planning Department states that the Community Infrastructure Levy will make provision for additional infrastructure, if planning permission is granted for such schemes. However, Riddlesdown, Purley and Sanderstead **have seen no improvement in the provision of our public services or infrastructure** despite the number of residential schemes that have recently been approved.

We are concerned that the Council continues to ignore our comments in respect of the need for additional infrastructure and public services to support new residential schemes like this. These points were raised by the RRA and a

number of other organisations at the recent Local Plan Inquiry.

- **Refuse bins** – we note the refuse bin area will be within the main entrance on the Lower Ground area of the development. Is this sensible bearing in mind the slope of the site, through the car park and transferred onto the refuse vehicle, probably parked in the street?

Reflecting on the above, the **RRA are extremely concerned that if permission is granted for this inappropriate development, it will set a precedent for other similar schemes to come forward, which in turn will result in a radical over intensification of residential areas in the Borough of Croydon**, without the provision of improved infrastructure and public services. Whilst Planning Committee members and Planning Officers rightly recognise the need for more housing in Croydon (and in the south of the Borough), it needs to be underpinned with a radical improvement of the supporting infrastructure.

The RRA are concerned to understand how the Council intend to assess the **cumulative impact of schemes like this** in respect to the issues raised in our objections – particularly the additional traffic, car parking requirements, health, education (especially primary), impact on residential amenity, and public transport (train and bus use). We ask that the Planning Officer states these specifics in the report to Committee supporting this scheme. If not, we will raise it.

The particular application has received an **unprecedented number of objections from local residents**. We would ask that the Council take on board ours and all other residents' objections and refuse this application. These views are also shared by an adjoining Residents Association, our MP, and Councillors.

Yours sincerely

For and on behalf of Riddlesdown Residents' Association (RRA)