

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

**Monks Orchard Residents'
Association
Planning**

6th November 2024

Emails:
james.udall@croydon.gov.uk
Development.management@croydon.gov.uk
dmcomments@croydon.gov.uk

Emails:
planning@mo-ra.co
chairman@mo-ra.co
hello@mo-ra.co

Reference: **24/03443/FUL**
Application Received: 09 Oct 2024
Application Validated: 09 Oct 2024
Address: 71 Tower View Croydon CR0 7PZ
Proposal: Subdivision of existing dwellinghouse to form two dwellings with addition of flat-roofed rear ground floor extension and pitched roof to existing two-storey side extension.
Status: Awaiting decision
Case Officer: James Udall
Consultation deadline: 10/11/2024

Dear James Udall– Case Officer

We have a minor comment to offer on this proposal which you may consider too trivial to accept but we need to register this for the record as theoretically the proposed dwelling 7a bed 3 does not meet the London Plan Policy D6 Area requirement for a single Bed accommodation.

Proposals parameters

Dwelling	Type	Floor	Bedrooms (b) (note 1)	Bed Spaces (bs) Claimed	Bed Spaces (bs) Allowed LP D6	GIA (existing) (sq.m)	GIA (Required) (Table A1.1 Best Practice)	GEA (Offered) (Scaled-off Plans) (sq.m.)	In-Built Storage (Offered) (sq.m.)	In-Built Storage (Required) (Table A1.1 Best Practice)	Amenity Area (Garden)	Amenity Area (Required) (sq.m.)	Play Space (required) (sq.m)	Car Parking (Offered)
Existing	House	Ground	0	0	0	82.5	118	85.29	Not Known	3.5	577.5	9	40	2
		First	4	6	5	82.5		Not Known						
		total	-	-	4	7		5	165					
71a		Ground	0	0	0	46.5	94	39.94	none offered	3	188	7		
		First	3	4	3	46.5		none offered						
		SubTotal	-	-	3	4		3	93					
71b		Ground	0	0	0	38.3	76	45.56	none offered	2.5	2.72	6		
		First	2	3	3	33.4		none offered						
		Sub Total	-	-	2	3		3	71.7					
Grand Total	7a + 7b		5	7	6	164.7	170	85.50	none offered	5.5	190.72	13	0	0

London Plan Policy D6 - Housing quality and standards

Private internal space

1) Dwellings must provide at least the gross internal floor area and built-in storage area set out in Table 3.1.

2) 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.

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

Building	Bedroom	Floor	Area (sq.m.)	Bed Spaces Offered	Maximum Capacity Occupants	LP D6 Required Area (sq.m.)
Existing	Bed 1	First	14.10	2	2	>11.5
	Bed 2	First	10.50	1	1	≥7.5<11.5
	Bed 3	First	6.00	1	0	<7.5
	Bed 4	First	10.56	1	1	≥7.5<11.5
	Bed 5	First	12.00	2	2	>11.5
Total			53.16	7	6	
Unit 7a	Bed 1	First	14.10	2	2	>11.5
	Bed 2	First	10.465	1	1	≥7.5<11.5
	Bed 3	First	7.4475	1	0	<7.5
Sub Total			32.0125	4	3	
Unit 7b	Bed 1	First	13.365	2	2	>11.5
	Bed 2	First	7.6304	1	1	≥7.5<11.5
Sub Total			20.9954	3	3	
Combined			53.0079	7	6	

This Unit 7a bedroom 3 problem could be resolved by a slight extension of the dividing wall between Bedrooms 2 & 3 with a slight repositioning of bed 2 door to align with the wall dividing bedroom 2 and the bathroom to 2.25 x 3.5 = 7.875sq.m. This would result in a slight reduction in the landing area which might be considered acceptable.

I don't quite understand why the architect didn't put this dividing wall directly above the dividing wall on the ground floor and continue it through to the first floor, to add structural support.

It is also noted that the existing floor plan for 71 Tower View, Bed 3 is only 6sq.m. and thus does (did) not meet the London Plan Policy D6.

The dimensions provided on the proposed Floor Plan for the Proposed **Unit 7a Bedroom 3** (and confirmed by scaled off measurement) is 2.250m x 3.310m = **7.4475 sq.m.** which is 0.0525 sq.m. short of the required **7.5 sq.m.** required of **London Plan Policy D6** for a single sized bedroom. Therefore, **Unit 7a** would only provide **2b3p** accommodation (not 3b4p) as stated in the proposal.

Gross Internal Area

The proposal assumes Unit 7a to be 3b4p capacity Table 3.1 GIA 84sq,m, (Table A1,1 Best Practice 94sq.m.), but **Bedroom 3** does **NOT** meet **Policy D6** requirement for a single bedroom and therefore the accommodation for **Unit 7a** is **2b3p.** capacity Table 3.1 GIA requires 70 sq.m. (Table A1.a Best Practice 76 sq.m.)

In Built Storage Space

The proposal gives no indication of any **Policy D6** requirements for **In—Built Storage** capacities for the revised **Unit 7a** or proposed **Unit 7b**.

Policy D6 para 3.6.2 states:

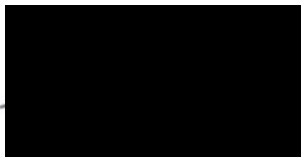
*“3.6.2 The space standards are **minimums** which applicants are encouraged to exceed. The standards apply to **all** new self-contained dwellings of any tenure, and consideration should be given to the elements that enable a home to become a comfortable place of retreat. ... “*

On the grounds that the proposal fails to meet the **London Plan Policy D6** on accommodation Space Standards, we believe that the Proposal is unacceptable.

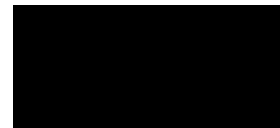
Please register this comment as **Monks Orchard Residents' Association (Objects)** on the Public Access Register.

Kind Regards

Derek



Derek C. Ritson I. Eng. M I E T.
Monks Orchard Residents' Association
Executive Committee – Planning
Email: planning@mo-ra.co



Ngaire Sharples
Secretary
Monks Orchard Residents' Association.
Email: hello@mo-ra.co

Cc:
Cllr. Sue Bennett
Cllr. Richard Chatterjee
Cllr. Mark Johnson
Bcc:
MORA Ezucutive Committee
Interested Parties

Shirley North Ward
Shirley North Ward
Shirley North Ward