

To: Case Officer – Mr Robert Lester
Development Environment
Development Management
6th Floor
Bernard Weatherill House
8 Mint Walk
Croydon
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From:
Monks Orchard Residents' Association
Planning

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28th May 2019
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Reference:	19/00783/FUL
Application Received:	Tue 19 Feb 2019
Application Validated:	Tue 19 Feb 2019
Address:	32 Woodmere Avenue Croydon CR0 7PB
Proposal:	Demolition of the existing property and the erection of a replacement detached two storey building with accommodation in the roof-space, comprising 7 self-contained flats (2 x 1 bedroom, 3 x 2 bedroom and 2 x 3 bedroom) with 5 off street car parking spaces, bike store, integrated refuse store and site access.
Status:	Awaiting decision
Case Officer:	Robert Lester
Consultation Close:	Thu 30 May 2019 (Extended)
Deadline determination:	Tue 16 Apr 2019

Dear Mr Lester

Resultant on the provision and notification of amended drawings, we have revised and updated our objection letter to take account of these changes to this development proposal. It is noted that the footprint of the proposal remains exactly the same and only the internal configuration has been modified to meet **London Plan Policy 3.5 – Minimum Space Standards** and the **Refuse** and **Bike Store** have been repositioned. Therefore, the main issues of **excessive and inappropriate Residential and Housing Densities** remain a significant non-compliance and reason for objection and **refusal** of this proposal.

The Monks Orchard Residents' Association (MORA) represents 3,897 Residential Households in the Shirley North Ward of the London Borough of Croydon. We are a Registered Residents' Association with Croydon Council Local Planning Authority (LPA).

We fully appreciate and understand the need for additional housing and we only object to proposals that do **not comply** with current adopted planning policies which are designed to ensure acceptable accommodation standards for future occupants, are within acceptable Residential and Housing Densities appropriate for the locality and respect the local character within acceptable constraints. On behalf of our members and local residents we continue to **object** to the above-mentioned planning application development proposal on the following grounds and request that a **more appropriate and compliant** proposal be submitted by the applicant.

**Representing, supporting and working with the local residents
for a better community**

The type face with green background are **current adopted** Planning Policies.

Relevant Planning Policies

London Plan Adopted Policies:

Policy 3.4 Optimising Housing Potential

Housing Supplementary Planning Guidance (SPG) (2016)

Policy 3.5 Quality and Design of Housing Developments

Policy 3.6 Children and young people's play and informal recreation

Policy 6.11 Smoothing traffic flow and tackling congestion

Policy 6.13 Parking

Croydon Local Plan adopted Policies:

Policy DM10: Design and character

Policy DM13: Refuse and recycling

Policy DM29: Promoting sustainable travel and reducing congestion

Policy DM30: Car and cycle parking in new development

Policy DM45: Shirley (Place Specific Policies).

The amended proposed development has the following parameters:

Site Area	0.06	ha
Existing Dwellings	1	
Existing Housing Density	16.67	u/ha
Existing Bedroom	3	
Existing Bed Spaces	5	Assumed
Existing Bed Spaces per hectare	83.33	bs/ha
Number of New Dwellings	7	Units
New Housing Density	116.67	u/ha
Habitable Rooms	21	hr
New Residential Density hr/ha	350.00	hr/ha
New Residential Density bs/ha	333.33	bs/ha
Average Hr/ha	3.0	hr/ha
New Bed Spaces	20	
Increase % in Bed Spaces/ha	300	%
PTAL (Base Year)	1a	
PTAL (Forecast 2031)	1a	
Car Parking provision	5	
Car Parking per occupant	0.25	

Post Code (PC) Area	7,910	sq.m.
hectares	0.791	ha
Post Code (PC) Area	CRO 7PB	
No of properties	20	
New properies	7	
Demolished properies	1	
New Total for Post Code	26	
Previous Housing Density/PC	25.28	u/ha
New Housing Density/PC	32.87	u/ha
% increase /PC	30	%

Proposed amended Development Parameters

Analysis of proposal against current Adopted Planning Policies

Current London Plan adopted Policies:

London Plan Policy 3.4 Optimising housing potential

Policy

Strategic, LDF preparation and planning decisions

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.**

The **Residential Density** of the proposed development is $21/0.06 = 350.00 \text{ hr/ha}$. The PTAL for the locality is **1a** (i.e. Numerically ≈ 0.66). The **Residential Density** broad range recommended for a Suburban Setting at **PTAL 1a** is between **150 hr/ha to 200 hr/ha**. However, the proposed development has **Residential Density** of **350.00 hr/ha** which is the **very highest** in the range of **PTAL 4 to 6** appropriate for Residential Densities in the range 200 hr/ha to 350hr/ha.

Assuming the incremental **PTAL** and **Residential Densities** over the broad ranges recommended are approximately linear, then the PTAL at **Residential Density** of **350 hr/ha** should be when calculated at the maximum of **6** and follow the straight-line graph of $y = mx + c$

where m = slope, y = **Residential Density**, x = PTAL and c = y intercept when $x = 0$

$$\text{Then, } 350 = \left(\frac{\Delta y}{\Delta x}\right)x - 100 = \left(\frac{350-200}{6-4}\right)x - 100; \text{ which gives: } \frac{350+100}{75} = x = 6.00 = \text{PTAL}$$

i.e. the maximum possible within the designated ranges.

Whereas the appropriate Residential Density should be approximately:

$$\text{Residential Density} \approx y = \left(\frac{\Delta y}{\Delta x}\right)x + 150 = \left(\frac{200-150}{1-0}\right)0.66 + 150 \approx 183 \text{ hr/ha}$$

Within the broad range of 150 to 200 hr/ha.

In addition, assuming the incremental **PTAL** and **Housing Density** broad ranges are approximately linear over the ranges, the **Housing Density** at $7/0.06 \text{ u/ha} = 116.67 \text{ u/ha}$ with an average habitable rooms per unit of $21/7 = 3.0 \text{ hr/u}$ requires a PTAL to be in the broad range of 50 to 75u/ha when the actual PTAL is also in the range 4 to 6 as can be shown by the formula: $y = mx + c$

where m = slope, y = **Housing Density**, x = PTAL and c = y intercept when $x = 0$.

$$\text{Then, } 116.67 = \left(\frac{\Delta y}{\Delta x}\right)x - 50 = \left(\frac{130-70}{6-4}\right)x - 50; \text{ which gives: } \frac{116.67+50}{30} = x = 5.556 = \text{PTAL}$$

Whereas the appropriate Housing Density at average 3hr/u should be approximately:

$$\text{Housing Density} \approx y = \left(\frac{\Delta y}{\Delta x}\right)x + 50 = \left(\frac{75-50}{1-0}\right)0.66 + 50 \approx 66.5 \text{ units/ha}$$

Within the broad range of 50 to 75 u/ha.

This can be shown at the Table below which is an extract from the London Plan Density Matrix Table 3.2 at a **suburban setting** to illustrate that the **Residential** and **Housing Density** of the proposed development is **exceedingly high** and **totally inappropriate** at **350hr/ha** and **Housing Density of 116.67u/ha** respectively for the locality which has a PTAL of **1a** (≈ 0.66) when the density actually requires a PTAL of **6** and 5.556 i.e. the maximum PTAL in the broad ranges shown on Table 3.2. The appropriate ranges for Residential and Housing Densities at this setting and PTAL 1a with an average of **3.0 hr/u** are shown in **WHITE Text**. The **Blue Text** shows the approximate appropriate Residential density of **$\approx 183 \text{ hr/ha}$** and Housing Density of **$\approx 66.5 \text{ u/ha}$** which should be the densities for a suburban locality with a PTAL of 1a (**0.66**) for this location.

Table 3.2 Sustainable residential quality (SRQ) density matrix (habitable rooms and dwellings per hectare)			
Setting	Public Transport Accessibility Level (PTAL)	Public Transport Accessibility Level (PTAL)	Public Transport Accessibility Level (PTAL)
	0 to 1 (1a= 0.66)	2 to 3	4 to 6 (HD 5.56) (RD 6)
Suburban	150–200 hr/ha (≈183 hr/ha)	150–250 hr/ha	200–350 hr/ha (350 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	40–65 u/ha	40–80 u/ha	55–115 u/ha
2.7–3.0 hr/unit (3hr/unit)	50–75 u/ha (≈66.5 u/ha)	50–95 u/ha	(116.67 u/ha) 70–130 u/ha

Extract from London Plan Policy 3.4 Optimising Housing Potential - Table 3.2
Red figures are for this proposal, White figures are the appropriate ranges for this location and **Blue** figures are the approximate appropriate values for this location.

The applicant has given **NO justification** or reasoning for **NOT meeting the current adopted London Plan Policy 3.4 on Optimising Housing Potential** within the **broad density** ranges and constraints given at **Table 3.2** to ensure that future occupants of the proposed developments have **adequate accessibility to local Public Transport Infrastructure**.

We therefore **object to this proposed development** on grounds of **overdevelopment** and that the **Residential Density** of **350hr/ha** is **totally inappropriate** at **PTAL 1a** and is more appropriate at a suburban setting with **PTAL** of **6.00** (i.e. the maximum public transport accessibility possible) and also that the **Housing Density** at **116.67u/ha** in the highest range possible, is **inappropriate** at a suburban setting with **PTAL** at **1a** and is more appropriate at a locality with **PTAL** of **5.56**.

As stated in the **current adopted London Plan Policy 3.4 Optimising housing potential, Development Proposals** which **compromise this policy**, **“should be resisted”**. This is the **current adopted London Plan Planning Policy**. The applicant has **NOT** provided any **justification** or reasoning for deviating from the recommended **“broad”** ranges as required of the current adopted **London Plan Policy** and as qualified in the **London Plan Housing Supplementary Planning Guidance (March 2016)**.

We therefore request that this application be refused on grounds of **inappropriate exceptionally high Housing and Residential Densities** at the proposed site location as defined by the **London Plan Policy 3.4 Optimising Housing Potential**, which would result in **excessive over development** of the locality and result in future occupants NOT having adequate accessibility to local **Public Transport Infrastructure** services.

Housing Supplementary Planning Guidance (SPG)

1.1.17 In robustly justified **exceptional circumstances** boroughs may identify particular locations where densities above the ranges in the SRQ matrix may be appropriate, taking into account local context, infrastructure capacity, viability and with further guidance in section 1.3.

1.3.22 Linking the level of density to the **accessibility of public transport** (and, in light of local circumstances, its frequency and capacity) **is a central consideration in making the best use of a site**, helping to realise the proper potential of those within walking distance of public transport and town centres whilst allowing lower densities where public transport accessibility and capacity is less.

1.3.23 ... Low PTAL scores do not by themselves preclude development, but **will limit the densities which will be appropriate on such sites**, unless a **significant change** in public transport connectivity levels can be achieved to justify the use of a **higher density range** without undermining the achievement of sustainable development. In assessing a site's capacity, **a site-specific PTAL assessment should be carried out.**

The PTAL forecast for this site is to remain at PTAL 1a until 2031.

Developments above the density ranges:

1.3.50 the London Plan and this SPG confirm that it is not appropriate to apply table 3.2 mechanistically and advise that the density ranges should be considered as a starting point rather than an absolute rule when determining the optimum housing potential of a particular site¹⁰². as confirmed in section 1.1, meeting London's housing requirements will necessitate residential densities to be optimised in appropriate locations with **good public transport access**. Consequently, the London Plan recognises the particular scope for **higher density residential** and mixed-use development in **town centres, opportunity areas and intensification areas, surplus industrial land and other large sites**¹⁰³. In addition, the Plan confirms that the housing SPG will provide general and geographically specific guidance on the **justified, exceptional circumstances** where the density ranges may be exceeded¹⁰⁴.

1.3.51 In **appropriate circumstances**, it may be acceptable for a particular scheme to **exceed** the ranges in the density matrix, **providing important qualitative concerns are suitably addressed**. However, to be supported, schemes which exceed the ranges in the matrix must be of a high design quality and **should be tested against the following considerations**:

- the factors outlined in Policy 3.4, including local context and character, public transport capacity and the design principles set out in chapter 7 of the London Plan;
- the location of a site in relation to **existing and planned public transport connectivity (PTAL)**, social infrastructure provision and other local amenities and services;
- the need for development to achieve high quality design in terms of liveability, public realm, residential and environmental quality, and, in particular, accord with the housing quality standards set out in Part 2 of this SPG;
- a scheme's overall contribution to local 'place making', including where appropriate the need for 'place shielding';
- depending on their particular characteristics, the potential for large sites to define their own setting and accommodate higher densities;
- the residential mix and dwelling types proposed in a scheme, taking into account factors such as **children's play space provision**, school capacity and location;
- the need for the appropriate management and design of refuse/food waste/recycling and cycle parking facilities; and

• whether proposals are in the types of accessible locations the London Plan considers appropriate for higher density development (e.g. **town centres, opportunity areas, intensification areas, surplus industrial land, and other large sites**).

1.3.52 where these considerations are satisfactorily addressed, the **London Plan provides sufficient flexibility** for such higher density schemes to be supported. It should, however, be recognised that this is not an exhaustive list and other more local or site-specific factors may also be given appropriate weight, taking into account the particular characteristics of a proposed development and its impact on the surrounding area.

This location does **NOT** have good public transport access, the proposed development is **NOT** for mixed-use in a **town centre, opportunity area or intensification area**, or is on **surplus industrial land** or another large site. The applicant has **NOT given any justification** or mentioned any reason for higher densities in their **Design and Access Statement** or given any other reason for **increased Housing or Residential Density** above the recommended ranges at this location of **PTAL 1a** and therefore the proposed **Densities significantly compromise the current London Plan Policy 3.4 on Optimising Housing Potential and should therefore be refused**.

We request that this application be refused on grounds of being **inappropriate unacceptable** and of **exceptionally high Housing and Residential Densities** at this proposed site location as defined by the **London Plan Policy 3.4 Optimising Housing Potential**, which would result in future occupants **NOT** having adequate accessibility to local Public Transport Infrastructure services.

Note: As a result of our **Stage 1 & 2 Complaint Ref: CASE4893951^{[1][2]}**, it has become apparent that Planning Officers are basing determinations on the emerging **London Plan Policies** on Density which assumes the **deletion of the Density Matrix Table 3.2**.

This assumption could be premature as the London Plan is currently undergoing Examination in Public (EiP) and representations by participants ^[3] show that it is not yet decided. Nevertheless, the emerging Policy at **Policy D6 Optimising Housing Density** would replace the current adopted policies on housing densities. **Policy D6** and the supporting **Policy D2 - Delivering Good Design** and **Policy D1 - London's form and characteristics**, requires analysis of the various particular contributing factors to **optimise density** and considers the **site, local characteristics, PTAL** and requires particular consideration to the **"evaluation criteria"** to determine the optimal development density. (i.e. more complex than the current adopted Density Matrix).

If the Case Officer makes a determination based on the emerging **Policy D6, D2 & D1** we would expect to see the analysis of the evaluation and the **'evaluation criteria'** as required of the draft **Policy D6** in the case officer's report to support the decision. It is NOT appropriate or professional to just ignore the Density Matrix without fully considering the substance of the replacement **Policies D6**, and supporting policies **D2 & D1**.

It is also appropriate to explain **"how and why"** a determination, if based on the analysis criteria as defined by the emerging **Policy D6, D2 & D1** provides a different conclusion to an evaluation by **Policy 3.4** of the current adopted Policy.

[1] Local Government Ombudsman Case Reference: ID – 19000971

[2] <http://www.mo-ra.co/planning/planning-complaints/>

[3] <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/examination-public-draft-new-london-plan/written-statements/density-m39#acc-i-55715>

London Plan Policy 3.5 Quality and Design of Housing Developments

A. Housing developments 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.

3.35 The quality of individual homes and their neighbourhoods is the product of detailed and local design requirements but the implementation of these across London has led to **too many housing schemes in London being of variable quality.**

The **cumulative effect of poor-quality homes**, and the citywide benefits improved standards bring, means this is a strategic issue and properly a concern of the London Plan. **Addressing these issues is an important element of achieving the Mayor's vision and detailed objectives for London and its neighbourhoods set out in [Chapter One](#).**

In order to meet the strategic objectives, set out in the London Plan Policy 3.5, specific requirements for minimum space Standards for New Dwellings have been defined as set out in Table 3.3.

Table 3.3 - Minimum Space Standards for New Dwellings					
Number of bedrooms	Number of bed spaces	Minimum GIA (m ²)			Built-in storage (m ²)
		1 storey	2 storey	3 storey dwellings	
		dwellings	dwellings		
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	

Extract from London Plan Policy 3.5 Table 3.3 Minimum Space Standards.

Initial Proposal	Units	Habitable Rooms (hr)	Bedrooms	Bed Spaces (occupants)	GIA Offered (sq.m.)	GIA Required (sq.m.)	Storage Offered (sq.m.)	Storage Required (sq.m.)	Private Amenity Balcony (sq.m.)	Private Amenity Required (sq.m.)
	Unit 1	4	3	4	80	74	0	2.5	26.5	7.0
	Unit 2	4	3	4	77	74	0	2.5	17	7.0
	Unit 3	2	1	2	52	50	0	1.5	0	5.0
	Unit 4	3	2	3	62	61	0	2.0	6	6.0
	Unit 5	2	1	2	51	50	0	1.5	6	5.0
	Unit 6	3	2	3	65	61	0	2.0	5	6.0
	Unit 7	3	2	4	70	70	0	2.0	6	7.0
	Total	21	14	22	457	440	0	14.0	66.5	43.0

Amended Drawings	Units	Habitable Rooms (hr)	Bedrooms	Bed Spaces (occupants)	GIA Offered (sq.m.)	GIA Required (sq.m.)	Storage Offered (sq.m.)	Storage Required (sq.m.)	Private Amenity Balcony (sq.m.)	Private Amenity Required (sq.m.)
9th May	Unit 1	4	3	4	79	74	2.5	2.5	39	7.0
	Unit 2	4	3	4	79.5	74	2.5	2.5	24.5	7.0
	Unit 3	2	1	1	42.5	39	0	1.0	5	5.0
	Unit 4	3	2	3	64	61	2	2.0	6	6.0
	Unit 5	2	1	2	51	50	1.5	1.5	6	5.0
	Unit 6	3	2	3	61.5	61	2	2.0	6	6.0
	Unit 7	3	2	4	70	70	2	2.0	5	7.0
	Total	21	14	21	447.5	429	12.5	13.5	91.5	43.0

Amended Drawings	Units	Habitable Rooms (hr)	Bedrooms	Bed Spaces (occupants)	GIA Offered (sq.m.)	GIA Required (sq.m.)	Storage Offered (sq.m.)	Storage Required (sq.m.)	Private Amenity Balcony (sq.m.)	Private Amenity Required (sq.m.)
16th May	Unit 1	4	3	4	79	74	2.5	2.5	39	7.0
	Unit 2	4	3	4	79.5	74	2.5	2.5	24.5	7.0
	Unit 3	2	1	1	43	39	0.25	1.0	5	5.0
	Unit 4	3	2	3	63.5	61	2	2.0	6	6.0
	Unit 5	2	1	2	51	50	1.5	1.5	6	5.0
	Unit 6	3	2	3	61.5	61	2	2.0	6	6.0
	Unit 7	3	2	3	70	70	2	2.0	6	6.0
	Total	21	14	20	447.5	429	12.75	13.5	92.5	42.0

Assessment of offered proposal against Minimum Space Standards

The only flat which, after subsequent applicants' amendments now does not fully meet Policy 3.5 Minimum Space Standards is **Unit 3** Storage requirement which is only **0.25m²** and thus deficient by **0.75m²** storage area.

Policy 3.6 Children and young people's play and informal recreation

A The Mayor and appropriate organisations should ensure that all children and young people have safe access to good quality, well-designed, secure and stimulating play and informal recreation provision, incorporating trees and greenery wherever possible.

The proposal indicates a location for Play Spaces for the children of this proposed development but does not indicate the actual area allocated for Play Spaces for Children to meet **Policy 3.6**. **Policy 3.6** provides an interactive spreadsheet which allows calculation of the appropriate area and for Market Flats of 2 x 1 Bedroom, 3 x 2 Bedroom and 2 x 3 Bedroom flats, the allocation is **9.8m²** as calculated using the GLA Benchmark of dedicated play space per child. It is not clear from the plans if this allocation is available for this proposed development.

London Plan Policy 6.11 Smoothing traffic flow and tackling congestion

A The Mayor wishes to see DPDs and Local Implementation Plans (LIPs) take a coordinated approach to **smoothing traffic flow** and **tackling congestion** through implementation of the recommendations of the Roads Task Force report.

London Plan Policy 6.13 Parking

Policy

Strategic

A The Mayor wishes to see an appropriate balance being struck between promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use.

B The Mayor supports Park and Ride schemes in outer London where it can be demonstrated they will lead to overall reductions in congestion, journey times and vehicle kilometres.

Planning decisions

C The maximum standards set out in [Table 6.2](#) in the Parking Addendum to this chapter **should be the basis for considering planning applications** (also see Policy [2.8](#)), informed by policy and guidance below on their application for housing in parts of **Outer London with low public transport accessibility (generally PTALs 0-1)**.

D In addition, developments in all parts of London must:

a ensure that **1 in 5 spaces** (both active and passive) **provide an electrical charging point** to encourage the uptake of electric vehicles

b provide parking for disabled people in line with [Table 6.2](#)

c meet the minimum cycle parking standards set out in [Table 6.3](#)

d provide for the needs of businesses for delivery and servicing.

The proposed development locality has PTAL of 1a at base year and is forecast to remain at PTAL 1a until at least 2031.

The London Plan Policy 6.13 at Table 6.2 for a Suburban Setting at Residential Density of **≈183hr/ha** and Housing Density of **≈66.5u/ha** requires between **1.5 and 2** parking spaces per dwelling and the emerging London Plan requires **1.5** spaces per dwelling. Therefore at least **10.5 > 11** spaces should be provided for this proposed development.

RESIDENTIAL CAR PARKING STANDARDS

Table 6.2 Car parking standards

Parking for residential development

	PTAL 0 to 1		PTAL 2 to 4		PTAL 5 to 6	
Suburban	150–200 hr/ha	Parking provision	150–250 hr/ha	Parking provision	200–350 hr/ha	Parking provision
3.8–4.6 hr/unit	35–55 u/ha	Up to 2 spaces per unit	35–65 u/ha	Up to 1.5 spaces per unit	45–90 u/ha	Up to one space per unit
3.1–3.7 hr/unit	40–65 u/ha		40–80 u/ha		55–115 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	Up to 1.5 spaces per unit	45–120 u/ha	Up to 1.5 spaces per unit	45–165 u/ha	Up to one space per unit
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	
Central	150–300 hr/ha		300–650 hr/ha		650–1100 hr/ha	
3.8–4.6 hr/unit	35–80 u/ha	Up to 1.5 spaces per unit	65–170 u/ha	Up to one space per unit	140–290 u/ha	Up to one space per unit
3.1–3.7 hr/unit	40–100 u/ha		80–210 u/ha		175–355 u/ha	
2.7–3.0 hr/unit	50–110 u/ha		100–240 u/ha		215–405 u/ha	

Maximum residential parking standards

number of beds	4 or more	3	1–2
parking spaces	up to 2 per unit	up to 1.5 per unit	less than 1 per unit

Notes:

All developments in areas of good public transport accessibility (in all parts of London) should aim for significantly less than 1 space per unit

Adequate parking spaces for disabled people must be provided preferably on-site³

20 per cent of all spaces must be for electric vehicles with an additional 20 per cent passive provision for electric vehicles in the future.

In outer London areas with low PTAL (generally PTALs 0–1), boroughs should consider higher levels of provision, especially to address ‘overspill’ parking pressures.

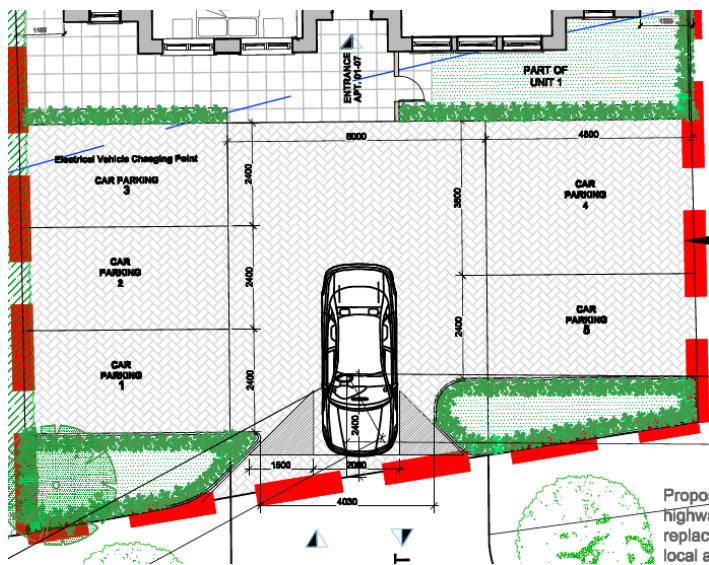
London Plan Policy 6.13 – Residential Parking Standards

It is therefore unacceptable to have a parking allocation of just **5 spaces** for **20 occupants** giving a parking allocation of **0.25 spaces per occupant** at a locality of **PTAL 1a**. Any Overspill car parking would be either in **Pipers Gardens** which is very narrow (**4.7m** wide as measured on Google Earth) or in **Woodmere Avenue** between two **dangerous bends** in the road. The

Standard car parking width of **2.4m** requires access road width of minimum **5m** to allow passing clearance. Therefore, it would be inappropriate for any overspill parking in **Pipers Gardens**. Also, the East side of Pipers Gardens (west of the proposed development) has a high **1.8m fence** for an extended length (**≈45m** again as measured on Google Earth) preventing opening of parked vehicle doors abutting the fence. Once parked, the vehicle would be partially blocking vehicular access (especially for emergency vehicles) and exit of residents in Pipers Gardens.

Alternative overspill on Woodmere Avenue at this vicinity would be between two very dangerous bends and would be hazardous to other motorists, commercial and/or delivery vehicles. Thus, any overspill parking would be inappropriate and would be contrary to **London Plan Policy 6.11 Smoothing traffic flow and tackling congestion**.

The plans show one disabled car parking bay but the Design and Access Statement or plans do not show any electric charging bay provision as required at **London Plan Policy 6.13 sub para D a)** which states proposals should *“ensure that 1 in 5 spaces (both active and passive) provide an electrical charging point to encourage the uptake of electric vehicles.”*



It is also noted that if all parking spaces are full and cars have been parked in a forward gear into the bays, the vehicle in **Bay 3** could not exit in a forward gear as there is insufficient room to manoeuvre in order to exit in a forward direction but would need to reverse out of the bay into the road before engaging a forward gear to proceed. It may just be possible for a car in Bay 4 (disabled Bay) to have sufficient manoeuvrability to exit after a number of reverse and forward shuffles to exit in a forward direction. The applicant should provide “Swept Path” diagrams to show whether ingress and

The current adopted **London Plan Policy 6.13 Parking Standards** given at **Table 6.2** provides suburban residential Parking Standards which at **PTAL 1a** allows up to **2 parking bays per dwelling**. The London Plan also acknowledges that in Outer London Boroughs with **low PTAL** (generally PTAL's 0 to 1), boroughs should consider **higher levels of provision**, especially to address '**overspill**' parking pressures. This would require **14 car parking spaces** whereas only **5** are provided. This is exactly the situation at this location as currently on-street parking around this locality is dangerous especially along Woodmere Avenue between the two bends.

There is no legislation to prevent car ownership or to restrict occupants from owning light vans for commercial or business activities which requires local parking overnight. We therefore object to this proposed development on grounds of inadequate parking provision of **5 bays** with allocation of only **0.25 bays per occupant**, in a locality of **PTAL 1a** and at an area of local parking medium stress between two dangerous bends in Woodmere Avenue. Recent piecemeal development in the MORA Post Codes has increased local residential population by **445** (including other recent

current proposals awaiting determination and the 15 additional persons resulting from this application if approved –This requires an increase in local PTAL to meet the increased **Housing and Residential Densities** in the locality.

The Ward is served by only one single-decker, 40-seater, **367 Bus Route** from West Croydon to/from Bromley via Shirley Oaks Village. This Bus Route is becoming heavily congested at peak times and the increase in Residential Densities from cumulative piecemeal developments is causing local passenger frustration. One additional service is dedicated for school children.

Location	Reference	Date of approval	Existing Dwellings	Approx Existing Occupants	New Proposed Dwellings	Habitable Rooms (hr)	New Bed Spaces or Occupants	Additional Occupants	Site Area (ha)	New Housing Density (u/ha)	Residential Density (hr/ha)	PTAL Required for Residential Density	Residential Density (bs/ha)*	Car Parking	Car Parking per Occupant	Actual PTAL
40 Orchard Ave	15/03885/P	10/11/15	1	2	8	30	24	22	0.1236	64.75	242.82	2.93	194.25	9	0.3750	2
68-70 Orchard Ave	16/01838/P	07/09/16	2	4	9	68	64	60	0.3128	28.77	217.39	2.32	204.60	18	0.2813	1b = 1.33
41-43 Orchard Way	16/04935/FUL	20/01/17	2	4	9	32	32	28	0.1470	61.22	217.69	1.35	217.69	9	0.2813	1a = 0.66
393 Wickham Road	16/00274/P	04/08/16	1	5	7	24	22	17	0.0758	92.35	316.62	3.66	290.24	7	0.3182	2
98-100 Orchard Way	16/03808/P	27/02/17	2	4	9	31	34	30	0.1370	65.69	226.28	1.53	248.18	9	0.2647	1a = 0.66
263 Wickham Road	15/04417/P	16/08/16	1	5	8	24	24	19	0.0646	123.88	371.63	4.22	371.63	9	0.3750	2
8-10 The Glade	17/00262/FUL	27/04/17	2	4	9	30	30	26	0.1396	64.47	214.90	1.30	214.90	9	0.3000	1a = 0.66
64 Woodmere Ave	15/01507/P	10/07/15	1	4	5	30	26	22	0.2900	17.24	103.45	0.66	89.66	14	0.5385	1a = 0.66
33 Orchard Way	17/03323/FUL	17/01/18	0	0	1	5	5	5	0.0601	16.64	83.19	0.66	83.19	2	0.4000	1a = 0.66
151 Wickham Road	17/06391/FUL	23/02/18	0	0	1	3	4	4	0.0200	50.00	150.00	3.00	200.00	0	0.0000	3
2-4 Woodmere Close	18/02746/FUL	09/08/18	0	2	1	6	5	3	0.0367	27.25	163.49	0.66	136.24	10	2.0000	1a = 0.66
6-8 Woodmere Close	18/03917/OUT	26/10/18	0	0	1	6	6	6	0.0400	25.00	150.00	0.66	150.00	4	0.6667	1a = 0.66
10-12 Woodmere Close	19/00051/FUL	27/02/19	0	0	1	6	6	6	0.0378	26.46	158.73	0.66	158.73	4	0.6667	1a = 0.66
48 Wickham Avenue	18/02734/FUL	21/09/18	0	0	1	6	5	5	0.0764	13.09	78.53	2.00	65.45	1	0.2000	2
20-22 The Glade	18/05928/FUL	01/02/19	0	0	2	10	12	12	0.0370	54.05	270.27	4.94	324.32	4	0.3333	1a = 0.66
9a Orchard Rise	18/06070/FUL	21/03/19	1	0	9	32	41	41	0.2011	44.75	159.12	0.66	203.88	12	0.2927	1a = 0.66
32 Woodmere Avenue	19/00783/FUL		1	5	7	21	20	17	0.0600	116.67	350.00	6.00	333.33	5	0.2500	1a = 0.66
17 Orchard Avenue	19/00131/FUL		1	Not Known	9	15	18	Not Known	0.0710	126.76	211.27	2.00	253.52	4	0.2222	2
56 Woodmere Avenue	19/01352/FUL		1	Not Known	9	28	29	Not Known	0.0950	94.74	294.74	5.26	305.26	6	0.2069	1a = 0.66
18a Fairhaven Avenue	19/01761/FUL		1	Not Known	9	30	33	Not Known	0.1071	84.03	280.11	5.07	308.12	9	0.2727	1a = 0.66
14-16 Woodmere Close	19/01484/FUL		0	0	1	6	5	5	0.0555	18.02	108.11	0.66	90.09	2	0.4000	1a = 0.66
Total			17	39	116	443	445	323	2.1880	1215.83	4368.34	50.19	4443.29	147	8.6450	
Average									0.1042	57.90	208.02	2.39	211.59	7.00	0.41	

Recent Local redevelopments and infill developments in the MORA Area

The additional cumulative local development requires reassessment of local bus service provision as residents are converting to other modes of transport to avoid this passenger congestion which is a preference for car usage which should be avoided.

Croydon Local Plan adopted Policies:

Croydon Plan **DM10**: Design and Character

Policy **DM10**: Design and character

DM10.1 Proposals should be of high quality and, whilst seeking to achieve a **minimum height of 3 storeys**, should respect:

- The development pattern, layout and siting;
- The scale, height, massing, and density;**
- The appearance, **existing materials** and built and natural features of the surrounding area; **the Place of Croydon in which it is located.**

6.37 The Croydon Local Plan provides policy on urban design, local character and public realm. However, in line with the **National Planning Policy Framework**, **there is a need to provide detailed guidance on scale, density massing, height, landscape, layout, materials and access. This will provide greater clarity for applicants.**

Although Croydon Local Plan Policy **DM10.1** and **Para 6.37** recognises a **need** for providing **detailed guidance** on SCALE, HEIGHT, MASSING, and DENSITY; the Croydon Local Plan Does **NOT** provide **any** guidance **whatsoever** or any greater clarity for applicants on either “SCALE, MASSING, and DENSITY” – **How is it possible to respect these parameters if there is NO guidance?**

Also, these characteristics are required as defined by the (new) **NPPF Para 16** which states:

NPPF 16

Plans should: sub para d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals; and at sub para e) be accessible through the use of digital tools to assist public involvement and policy presentation;

and at NPPF para 122 – **Achieving Appropriate Densities,**
Planning policies and decisions should support development that makes efficient use of land, taking into account:

c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;

and at sub para d)

d) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change.

Therefore, the **Croydon Plan para DM10.1** and **para 6.37** relies on the current adopted **London Plan Policy 3.2 Density Matrix** as the **ONLY AVAILABLE GUIDANCE** for **Scale, Density and Massing** in order to meet the **Croydon Plan Policy DM10.1** and **para 6.37** in addition to the guidance required at **NPPF para 16 d)** and **NPPF para 122 – Achieving appropriate Densities.**

Thus, **MORA comments** on **Croydon Plan Policy DM10.1** and **para 6.37** are covered by our response above relating to **London Plan Policy 3.4 Optimising Housing Potential (above).**

DM10.2 Proposals should create clear, well defined and designed public and private spaces. **The Council will only consider parking within the forecourt of buildings in locations where the forecourt parking would not cause undue harm to the character or setting of the building and where forecourts are large enough to accommodate parking and sufficient screening without the vehicle encroaching on the public highway.** The Council will support proposals that incorporate cycle parking within the building envelope, in a safe, secure, convenient and well-lit location. Failing that, the council will require cycle parking to be located within safe, secure, well lit and conveniently located weather-proof shelters unobtrusively located within the setting of the building.

The parking provision is all on the **forecourt** of the proposed development which is **contrary** to **Policy DM10.2** although screened by Shrubs. It is not stated the variety of shrub or height of matured specimens to afford adequate screening to meet the policy requirement.

DM10.4 All proposals for new residential development will need to provide private amenity space that.

a. Is of high-quality design, and enhances and respects the local character;

- b. Provides functional space (the minimum width and depth of balconies should be 1.5m);
- c. Provides a **minimum amount of private amenity space of 5m² per 1-2 person unit and an extra 1m² per extra occupant thereafter;**

Other than Unit 3, the Balconies are placed on the North facing elevation partially occupying accommodation floor space and are unlikely to ever have direct sunlight and so would be forever in the shade. Unit 3 balcony is West facing but is set back occupying floor space and would likewise be forever in the shade.

This is due to the configuration of the proposed dwelling on the available plot. This configuration therefore does not give future occupants of Units 4 to 7 any opportunity to privately sit in the sun. They will have to use the communal garden area.

DM10.5 In addition to the provision of private amenity space, proposals for new flatted development and major housing schemes will also need to incorporate high quality communal outdoor amenity space that is designed to be flexible, multifunctional, accessible and inclusive.

Policy DM10.5 is deficient in identifying the appropriate area allocated to “**communal outdoor amenity space**” in that the amount of space per occupant for any proposed development is **NOT** specified.

Thus, the **Croydon Local Plan Policy** does **NOT** specify the appropriate ‘allocation’ of “communal outdoor amenity space” and therefore the policy is **NOT deliverable** and NOT compliant to **NPPF para 16** which states:

16. Plans should:

- b) be prepared positively, in a way that is aspirational but deliverable;
- c) be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisation's, businesses, infrastructure providers and operators and statutory consultees;
- d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;

Without specifying the allocation per occupant, the **Croydon Local Plan** at **DM10.5** does not provide adequate guidance for applicants to meet the policy and the policy does **NOT** meet the guidance required by **NPPF Para 16 d)**.

DM10.6 The Council will support proposals for development that ensure that;

- a. The amenity of the occupiers of adjoining buildings are **protected**; and that
- b. They do not result in **direct overlooking** at close range or habitable rooms in main rear or private elevations; and that
- c. They do not result in direct overlooking of **private outdoor space** (with the exception of communal open space) within **10m perpendicular** to the rear elevation of a dwelling; and that
- d. Provide adequate **sunlight and daylight to potential future occupants**; and that
- e. They do not result in significant loss of existing sunlight or daylight levels of adjoining occupiers.

The proposed development has obscure glazed windows on the first floor East facing elevation which meets **Policy DM10.6 b) and c)**. However, as the balconies are on a North

facing elevation, the configuration does NOT allow adequate sunlight for potential occupants at balconies of Units 4 to 7 and therefore does not comply with **Policy DM10.6 d)**.

The **Supplementary Planning Document SPD2, Chapter 2 Suburban Residential Developments at Para 2.11 Heights & Depths Projecting beyond Building Lines** at pages **36 & 37** describes a **45° rule** for new developments with adjacent properties.



Illustrations of the 45° Rule regarding adjacent properties

Although the offered drawings do not provide a rear elevation of the adjacent property at **30 Woodmere Avenue, Drawing PP02-02** illustrates the **45°** from middle of the window of the adjacent dwelling which can be estimated transposed to the front of the property to be about the centre of the street door as shown above; as **30 Woodmere Avenue** is tapered, the actual distance would be closer to the proposed development at the rear of the adjacent property and thus even worse than depicted on the diagram shown above. This illustrates that the proposed development **fails to meet the 45° rule on height** in relation to the **adjacent property at 30 Woodmere Avenue**. The Case Officer should request the applicant to provide rear elevations with the **45°** projection from the **centre of the ground floor window of the adjacent property** to verify compliance or otherwise with the **45° Rule**. The illustration above shows a significant overbearing nature of the proposed development on the adjacent property at **30 Woodmere Avenue** if measured from the **centre rear adjacent ground floor window**.

Policy DM13: Refuse and Recycling

DM13.1 To ensure that the location and design of refuse and **recycling facilities** are treated as an **integral element of the overall design**, the Council will require developments to:

- a. **Sensitively integrate refuse and recycling facilities** within the **building envelope**, or, in conversions, where that is not possible, integrate within the landscape covered facilities that are **located behind the building line** where they will not be **visually intrusive** or compromise the provision of shared amenity space;

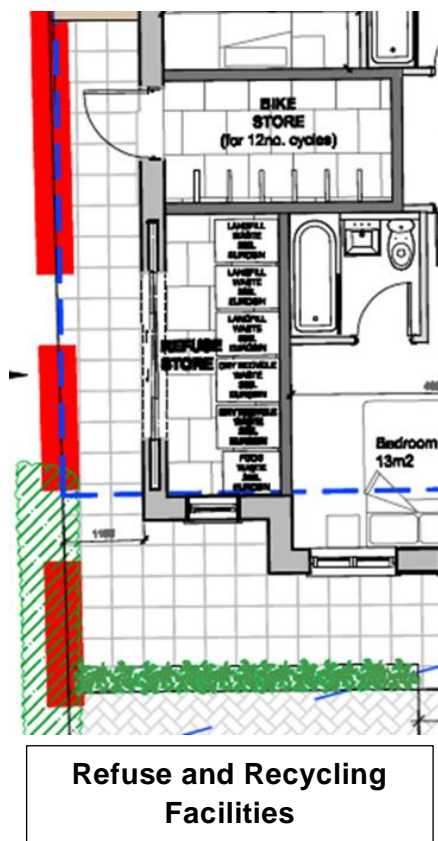
- b. Ensure facilities are **visually screened**;
- c. Provide **adequate space for the temporary storage of waste** (including **bulky waste**) materials generated by the development; and
- d. Provide layouts that ensure facilities are safe, **conveniently located and easily accessible by occupants, operatives and their vehicles.**

The Council Refuse & Recycling guidance included at:

www.croydon.gov.uk/sites/default/files/articles/downloads/Newbuild_guidance.pdf

gives requirements for new developments at **Section 4 - Flats with 5 or more units.**

As the Waste and Recycling Planning Policy Document was published in August 2015 and edited in October 2018, it is not understood why the **Policy DM13** does NOT embody these requirements.



However, the London Borough of Croydon recommends that developers follow this guidance and that Flats with up to **9** units will require an **1100ltr for general waste**, using this as a base the Council recommend **122.2 litres per flat**.

It is understood that there must be a minimum of **150mm clearance** around and between each bin within a storage area. Where there is more than **one bin** within a storage area, there must be **2m clearance in front of each bin** to enable it to be accessed and safely moved without needing to move any of the other containers. The proposed development does not provide this **2m clearance** in front of the bins to allow safe movement.

The amended plans show the Refuse Storage has been moved further to the front of the proposed development and has sliding doors to prevent obstruction when removing the refuse bins for emptying at the Refuse vehicle.

Furthermore, it is understood that all doors and alleys must be at least **2m wide** to allow for safe manoeuvring of bins. The access pathway at the Refuse Store is only **≈1.3m** and this pathway is tapered to **1.1m** wide at the South East

Corner of the building and therefore **Non-Compliant** to this requirement. It should also be clear of any rainwater down pipes and gulleys, but these rainwater pipes and gulleys are not shown on the provided plans or documentation.

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.

10.33 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.

As previously stated, recent piecemeal development in the **Shirley North Ward**, will increase local residential population by **≈446**. To meet these increases in Residential Densities requires a proportionate increase in PTAL in the locality. The Ward is served by a single decker **367 Bus Route** from West Croydon to/from Bromley via Shirley Oaks Village. This Bus Route is becoming heavily congested at peak times and the increase in Residential Densities resultant from cumulative piecemeal developments is causing local passenger frustration. An additional **Bus Service 689** has been introduced to serve local schools as the **367** single decker could not cope during the school run congestion period. The 367 Buses vary between 20min and 30min intervals depending on time of day and capacity.

The additional cumulative local development requires reassessment of local bus service provision as residents are converting to other modes of transport to avoid this passenger congestion which is a preference for car usage **which should be avoided**.

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;**

The Croydon Local Plan for **Residential Parking** is more stringent than the **London Plan Policies** in that the Policy is as per **London Plan Table 6.2** however, with no provision for higher levels of car parking in areas with low Public Transport Accessibility Levels, which ignores the reasoning for additional parking provision to alleviate overspill on-street parking. Perhaps this is why Croydon is suffering increased traffic congestion in residential areas because as previously stated there is no legislation preventing car ownership or the ownership of light vans for business or commercial activities.

Disabled Dwelling Accommodation

The presumption is that the disabled occupant's dwelling is on the ground floor at Unit 1 nearest the Disabled Parking Bay. However, the access is no wider than other units for wheelchair access and the internal doors are equally no wider than other units and therefore the accommodation at Unit 1 is unsuitable for wheelchair access or wheelchair mobility within the unit.

Policy: Shirley (Place Specific Policies).

Homes

11.200 An area of sustainable growth of the suburbs with some opportunity for windfall sites will see growth mainly confined to infilling with dispersed integration of new homes **respecting existing residential character and local distinctiveness.**

Character, Heritage and Design

11.202 New development will be **sensitive to the existing residential character** and the wooded hillsides of the Place referring to the Borough Character Appraisal to **inform design quality**. Public realm improvements will focus on the Local Centre. Any building and conversions should be of a high standard of design to **ensure the character** of the Centre is respected.

Transport

11.205 With **improved access and links where possible**, the existing connectivity and **good public transport of Shirley will be maintained**. The community **will** enjoy better quality, **more frequent** and **reliable** bus services connecting with Croydon Metropolitan Centre. Travel plans will look to *ease congestion at peak times* in the Local Centres by encouraging walking, cycling or public transport especially for school journeys. **(Not actually so!)**

The proposed development is an overdevelopment for the locality and does **NOT respect the existing residential and housing densities** and therefore is non-compliant to **Policy: Shirley Place Homes para 11.200 & Character, Heritage and Design para 11.202**.

There has been “**absolutely no improved access or transport links**” in **Shirley** with increased residential occupancy of 328 persons resulting from in-fill and redevelopment and therefore the policy **Shirley Place Transport para 11.205 has NOT been fulfilled**.

Conclusions:

It is understood that Croydon requires additional housing but we maintain that any new housing developments must be in accordance with the current adopted planning policies.

Although the proposed development presented is architecturally acceptable, the proposal **fails** on a number of **Planning Policies** which results in **significant overdevelopment of the proposal** for the locality in terms of both **Residential and Housing Densities**.

We therefore **object** to this proposed development on grounds of over-development and non-compliance to the **current adopted London Plan Policy 3.4 Optimising Housing Potential** due to **excessive Residential Density of 350hr/ha** and **excessive Housing Density at 116.67 u/ha** for a locality of **PTAL 1a. without Justification**. The current adopted London Plan Policy indicates that developments which **compromise this policy without justification should be refused**.

The proposal indicates a location for Play Spaces for the children of this proposed development but does not indicate the actual area allocated to meet **Policy 3.6 Children and young people's play and informal recreation**. **Policy 3.6** requires the allocation for this proposals to be **9.8m²** as calculated using the GLA Benchmark of dedicated play space per child. It is not clear from the plans if this allocation is available for this proposed development.

We **object** to this proposed development on grounds of **inadequate parking provision** and **non-compliance to the London Plan Policy 6.13 for Outer London Boroughs** which would result in overspill on-street parking reducing traffic Flow and contribute to traffic congestion and is therefore **non-compliant to London Plan Policy 6.11**.



Proposed Development - Front Elevation

We object to the proposed development on grounds of non-compliance to **Croydon Plan Policy DM10.1 and Para 6.37** which although recognises a need for providing detailed guidance on **SCALE, HEIGHT, MASSING, and DENSITY**; the Croydon Local Plan Does **NOT** provide any guidance whatsoever or any greater clarity for applicants on either “**SCALE, HEIGHT, MASSING, and DENSITY**” as required by the **New NPPF para 16 and para 122**. Thus, **MORA comments** on **Croydon Plan Policy DM10.1 and para 6.37** are covered by our response to the **current adopted London Plan Policy 3.4 Optimising Housing Potential**.

We object to this proposed development on grounds that the parking provision is all on the **forecourt** of the proposed development which is contrary to **Policy DM10.2**; that the configuration does not allow **adequate sunlight for Balconies of units 4 to 7**.

We object to the proposed development on grounds that it does **NOT meet the 45° Rule** on **height** as measured from the adjacent dwelling ground floor window as required by the emerging **Supplementary Planning Document SPD2, Chapter 2 Suburban Residential Developments at Para 2.11 Heights & Depths Projecting beyond Building Lines** at pages **36 & 37**, which results in overbearing and crowding to the adjacent dwelling.

We conclude that the proposed development is an overdevelopment for the locality and does **NOT** respect the existing **residential and housing densities** and therefore is non-compliant to **Policy: Shirley Place Homes para 11.200 & Character, Heritage and Design para 11.202**. There has been “**absolutely no improved access or transport links**” in **Shirley** with increased residential occupancy of **328 persons** resulting from in-fill and redevelopment and therefore the policy **Shirley Place Transport para 11.205** has **NOT** been fulfilled.

Although the applicant has provided amended drawings which modifies the internal configuration of the proposal to meet London Plan Policy 3.5 to be compliant to the minimum space standards, there remains significant non-compliance to other planning policies which combine to make this proposal unacceptable and warrant a refusal.

We therefore request that this application, as amended, be refused and request that the applicant submits a new application which meets all appropriate planning policies to ensure suitable accommodation standards, appropriate Residential and Housing densities to meet acceptable public transport accessibility, acceptable car parking provision and meets the 45° Rule against overbearing and crowding toward the adjacent dwelling to ensure that the proposal is appropriate for the locality and such that the proposal is suitable to meet housing need for the locality.

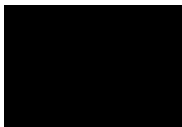
Please list our representation on the on-line public register as **Monks Orchard Residents' Association (Objects)** such that our members are aware of MORA's support.

Please inform us at planning@mo-ra.co of your 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:

Sarah Jones MP
Mr. Pete Smith
Steve O'Connell
Cllr. Sue Bennet
Cllr. Richard Chatterjee
Cllr. Gareth Streeter

Croydon Central
Head of Development Management (LPA)
GLA Member (Croydon & Sutton)
Shirley North Ward Councillor
Shirley North Ward Councillor
Shirley North Ward Councillor

Bcc:

MORA
Local Residents
Interested Parties

Executive Committee