

To: Case Officer – Mr Paul Young  
Development Environment  
Development Management  
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CR0 1EA

**Monks Orchard Residents' Association  
Planning**

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<b>Reference:</b>	<b>19/03064/FUL</b>
<b>Application Received:</b>	<b>Mon 01 Jul 2019</b>
<b>Application Validated:</b>	<b>Thu 11 Jul 2019</b>
<b>Address:</b>	<b>37 Woodmere Avenue Croydon CR0 7PJ</b>
<b>Proposal:</b>	<b>Demolition of existing dwelling. Erection of two storey building (with roof-space accommodation) comprising 8 flats (1 x 3 bed, 5 x 2 bed and 2 x 1 bed) with associated car parking, amenity space and cycle and waste stores.</b>
<b>Status:</b>	<b>Awaiting decision</b>
<b>Case Officer:</b>	<b>Paul Young</b>
<b>Consultation Close:</b>	<b>Sun 04 Aug 2019</b>
<b>Deadline determination:</b>	<b>Thu 05 Sep 2019</b>

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Dear Mr Young & Development Management

The Monks Orchard Residents' Association (MORA) represents residents in the Shirley North Ward of the London Borough of Croydon. We are a registered Residents' Association with Croydon Council Local Planning Authority (LPA).

On behalf of our members and local residents we object to the above-mentioned planning application development proposal on the following grounds. We only object when proposals do not comply with current adopted planning policies which are designed to minimise overdevelopment and retain the local character within acceptable constraints. **The type face with green background are current adopted Planning Policies.**

## Recent Planning History

### Application Ref: - 08/01171/P

Erection of a three-bedroom detached house; formation of vehicular access and provision of associated parking at: 37 Woodmere Avenue, Croydon, CR0 7PJ  
Decision: **Permission Refused - 11 June 2008.**

Reason(s) for refusal: -

1. The siting and layout of the development would not respect or improve the existing pattern of buildings and the spaces between them, appearing cramped and overcrowded, thereby out of keeping with the character of the locality, conflicting with Policies UD2, H2 and H5 of the Croydon Replacement Unitary Development Plan (The Croydon Plan)
2. The development would not respect the height of the existing buildings which play an important role in the character of the street scene and would thereby conflict with Policy UD3 of the Croydon Replacement Unitary Development Plan (The Croydon Plan)
3. The development would be detrimental to the residential amenities of the occupiers of the host property by reason of overlooking and visual intrusion and would thereby conflict with Policies UD2 and UD8 of the Croydon Replacement Unitary Development Plan (The Croydon Plan)
4. The development would result in an unsatisfactory residential environment being provided for the occupiers of the proposed dwelling by reason of the inadequate private amenity space and would thereby conflict with Policies UD8 of the Croydon Replacement Unitary Development Plan (The Croydon Plan)
5. It has not been demonstrated that the necessary pedestrian visibility splays and vehicle sight lines are achievable and would thereby conflict with Policies T11 of the Croydon Replacement Unitary Development Plan (The Croydon Plan)

**Appeal Ref: APP/L5240/A/08/2079084**

37 Woodmere Avenue, Croydon, CRO 7PJ

Appeal Dismissed – 5th January 2009

**Application No: - 16/03640/P**

Erection of detached two-bedroom chalet bungalow at side; formation of vehicular access and provision of associated parking at:

37 Woodmere Avenue, Croydon, CR0 7PJ

**Reason(s) for refusal - 21 October 2016: -**

1. The siting and layout of the development would not respect or improve the existing pattern of buildings and the spaces between them and would appear a dominant and poorly designed element in the street scene forward of the building line. The development would thereby be out of keeping with the character of the locality and harmful to the street scene, conflicting with Policies UD2, UD3 and H2 of the Croydon Replacement Unitary Development Plan (The Croydon Plan 2006) Saved Policies 2013, policy SP4 of the Croydon Local Plan: Strategic Policies 2013 and policies 7.1, 7.4, 7.5 and 7.6 of the London Plan (consolidated with amendments since 2011)
2. The development would be detrimental to the amenities of the occupiers of the adjoining property by reason of loss of light, loss of outlook, visual intrusion and overbearing impact and would thereby conflict with Policy UD8 of the Croydon Replacement Unitary Development Plan (The Croydon Plan 2006) Saved Policies 2013, Policy 7.6 of the London Plan (consolidated with amendments since 2011)

**So, what has changed?**

## Relevant Planning Policies:

London Plan Policy 3.4 Optimising Housing Potential

London Plan Policy 3.5 Quality and Design of Housing Developments

London Plan Policy 6.13 Parking

Croydon Local Plan Policy DM10: Design and character

Croydon Local Plan Policy DM45: Shirley (Place Specific Policies).

The proposed development has the following parameters:

Site Area	875	sq.m.	Footprint of Building	278	sq.m.	
Site Area	0.0875	ha	Percentage of Site Area	31.77	%	
	Bedrooms	Bedspaces	Habitable Rooms	GIA (sq.m.)	Built-In Storage (sq.m.)	Private Amenity (sq.m.)
Flat 1	1	2	3	50	1.5	24.1
Flat 2	3	5	5	89	2.5	108.3
Flat 3	1	2	3	50	1.8	29.7
Flat 4	2	4	4	70	3.2	7.1
Flat 5	2	4	4	70	2.0	7.0
Flat 6	2	4	4	71	2.0	7.0
Flat 7	2	3	4	76	3.4	6.0
Flat 8	1	2	3	56	1.2	5.5
<b>Totals</b>	<b>14</b>	<b>26</b>	<b>30</b>	<b>532</b>	<b>17.6</b>	<b>194.7</b>
Housing Density	91.43	u/ha	PTAL Required	4.71		
Residential Density	342.86	hr/ha	PTAL Required	5.79		
PTAL (Base)	1a	0.66	at Housing Density	48.8	u/ha	
PTAL 2031	1a	0.66	at Residential Density	183.0	hr/ha	
Number of Occupants	26		Average Occupants/Unit	3.25		
Parking Spaces	8		Play Area $A = \pi r^2$	19.635	sq.m.	
Disabled Bays	1					
Electric Charging bays	?	Not Stated				
Parking /Occupant	0.31					
Average hr/unit	3.75	hr/u				
Communal Open Space	?	Not Stated				

## 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.**

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The **Residential Density** of the proposed development is  $26/0.0875 = 342.86\text{hr/ha}$ . The PTAL for the locality is **1a** (i.e. Numerically  $\approx 0.66$ ). The Residential Density range recommended for a Suburban Setting at **PTAL 1a** is between **150 to 200hr/ha**. However, the proposed development has **Residential Density** of **342.86hr/ha** which is in the **very highest range of PTAL 4 to 6** which would be appropriate for **Residential Densities in the range 200 to 350hr/ha**.

Assuming the incremental **PTAL** and **Residential Densities** over the ranges recommended are approximately linear, then the PTAL at **Residential Density** of **342.86 hr/ha** should follow the linear graph of:  $y = mx + c$

where  $m = (\Delta y / \Delta x) = \text{slope}$ ,  $y = \text{Residential Density}$ ,  $x = \text{PTAL}$  and  $c = y$  intercept when  $x = 0$

$$\text{Then, } 342.86 = \left(\frac{\Delta y}{\Delta x}\right)x - 100 = \left(\frac{350-200}{6-4}\right)x - 100 = \frac{342.86+100}{75} = x = 5.905 = \text{PTAL}$$

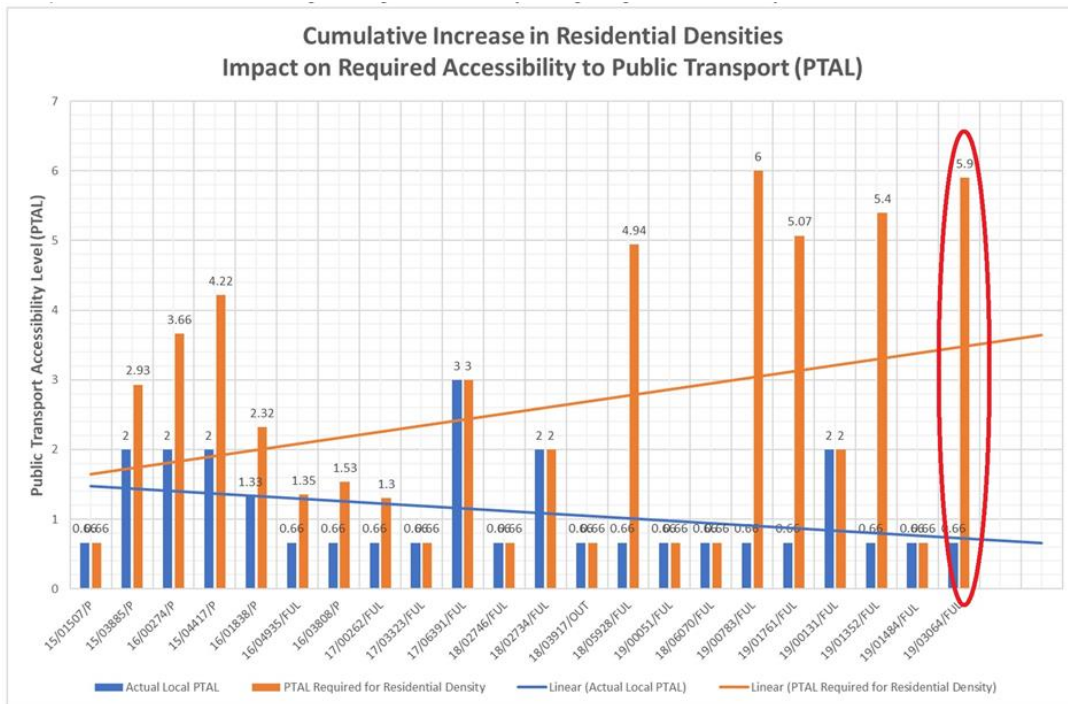
In addition, assuming the incremental **PTAL** and **Housing Density** ranges are approximately linear over the ranges, the **Housing Density** at  $8/0.0875 \text{ u/ha} = 91.4285\text{u/ha}$  with an average habitable rooms per unit of  $30/8 = 3.75\text{hr/u}$  requires a PTAL to be in the range of **50 u/ha to 75 u/ha** when the actual PTAL is also in the highest range of **4 to 6** as can be shown by the formula:  $y = mx + c$

where  $m = (\Delta y / \Delta x) = \text{slope}$ ,  $y = \text{Housing Density}$ ,  $x = \text{PTAL}$  and  $c = y$  intercept when  $x = 0$ .

$$\text{Then, } 91.43 = \left(\frac{\Delta y}{\Delta x}\right)x - 50 = \left(\frac{115-55}{6-4}\right)x - 50 = \frac{91.43+50}{30} = x = 4.713 = \text{PTAL}$$

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 RD(5.9) & HD(4.7)
Suburban	150–200 hr/ha (183 hr/ha)	150–250 hr/ha	200–350 hr/ha (342.86 hr/ha)
3.8–4.6 hr/unit (3.75hr/u)	35–55 u/ha	35–65 u/ha	45–90 u/ha
3.1–3.7 hr/unit	40–65 u/ha (56.5 u/ha)	40–80 u/ha	55–115 u/ha (91.43u/ha)
2.7–3.0 hr/unit	50–75 u/ha	50–95 u/ha	70–130 u/ha

Extract from London Plan Policy 3.4 Optimising Housing Potential - Table 3.2 (Appropriate Densities for this locality shown in **BLUE**, actuals shown in **RED**)



**Illustration of excessive PTAL Requirement above the Local available PTAL due to Increased Densities of Applications in the MORA Post Code Area showing the ongoing PTAL linear trend requirement. (This most recent application circled)**

If the PTAL between 0 and 2 is assumed linear the PTAL 1a = 0.66 and PTAL 1b = 1.33. Then it can be shown above at an extract from the London Plan Density Matrix Table 3.2 at a **suburban setting** to illustrate that the **Residential Density** of the proposed development is **totally inappropriate at 342.86hr/ha** for the locality which has a **PTAL of 1a (≈0.66)** when it **actually requires a PTAL of 5.9** in the ranges 4 to 6 shown on Table 3.2.

Similarly, a **Housing Density of 91.43 u/ha** is totally inappropriate for a locality of PTAL 1a which would actually require a **PTAL of 4.713** – in the highest range **4 to 6**, but the locality has a **PTAL of 1a** in the lowest range at a suburban setting. The appropriate ranges for Housing Densities at this setting and **PTAL of 1a** with an average of **3.75 hr/u**.

The **appropriate** value for **Residential & Housing Densities** at this setting at **PTAL 1a** with an average of **3.75 hr/u** are established similarly by:  $y = mx + c$

where  $m = (\Delta y / \Delta x) = \text{slope}$ ,  $y = \text{Residential Density}$ ,  $x = \text{PTAL}$  ( $1a \equiv 0.66$ ) and  $c = y$  intercept when  $x = 0$

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

and where  $m = (\Delta y / \Delta x) = \text{slope}$ ,  $y = \text{Housing Density}$ ,  $x = \text{PTAL}$  ( $1a \equiv 0.66$ ) and  $c = y$  intercept when  $x = 0$

$$\text{Then } y = \text{Housing Density} = \left(\frac{\Delta y}{\Delta x}\right)x + c = \left(\frac{65-40}{1-0}\right)0.66 + 40 \approx 56.5 \text{ units/ha}$$



The population of just the MORA Post Code area has increased by close on 500 since 2015 with absolutely no increase in supporting infrastructure; we have also lost two GP surgeries recently resulting in increased delays for obtaining appointments. If the appropriate Housing and Residential Densities are NOT observed, as in this case, the public support infrastructure and Public Transport accessibility becomes oversubscribed at the higher density localities and cannot meet the required demand. The single bus route 367 becomes overcrowded. The Monks Orchard Post Code Area has a single bus route 367 and is a single decker service through a residential area, within a road network which is not suitable for large double decker buses. The passenger carrying capacity is therefore limited and is also infrequent such that the buses get busier at the sites of inappropriate high residential densities, as they travel through the residential area, often becoming full to capacity and not stopping to pick up further waiting passengers as they proceed. Some residents have a 15-20min walk to a bus stop. As the service is only 20min intervals at best, these waiting passengers become very frustrated and eventually resort to other means of transport which is likely their personal car which is a significant waste of available road space for only one driver and thus contributes to local traffic congestion. Are these not Planning Issues to be considered when determining an application?

We keep hearing statements to the effect that improved infrastructure follows developments but we cannot see any evidence of this in our area. Also, the questionable statements that Croydon has a high number of applicants on the housing waiting list – but these dwellings are never occupied from people on the waiting list as a) they are too expensive and b) these dwellings are purchased by people from outside our waiting list catchment area and c) possibly purchased by overseas buyers for leasehold renting. The interpretation of current Planning Policies to meet housing needs or targets are definitely not sensible Planning Policies for Croydon's homeless.

The locality has **not** seen any recent improvement of infrastructure from Community Infrastructure Levy (CIL) contributions and therefore the collected CIL has not contribute to Shirley North Ward localities lack of services and infrastructure.

The guidance for exceeding the density ranges are set out in the **London Plan Supplementary Planning Guidance at paragraph 1.3.8 which states:**

*"guidance on considering schemes **above or below** the ranges in the density matrix is provided below in **paras 1.3.50 to 1.3.55.**"*

#### **Developments above the density ranges**

**Para 1.3.50** ..."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**<sup>103</sup>. 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 exceeded**<sup>104</sup>."

The Public Transport Accessibility at this location is 1a in the ranges 0 to 6 and as such is in the lowest category range – 0 1a 1b 2 ... to ... 6a 6b.

Also, this location is **NOT** in a **"town centre, an opportunity area or a designated intensification area, and NOT surplus or industrial land or other large site<sup>103</sup>"** and therefore does not meet any of the exceptional circumstances where the density ranges may be exceeded.

**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 livability, 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.

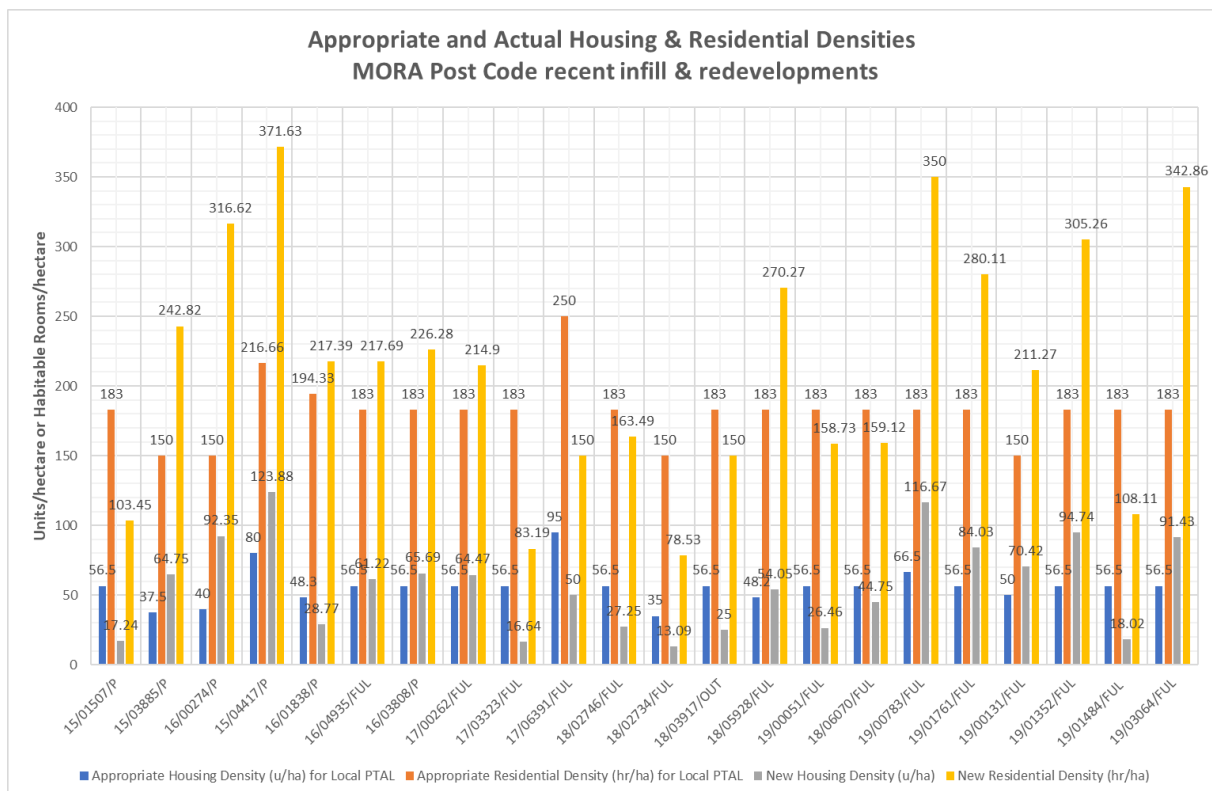
These justifications did not include the provisions of **SPG paras 1,3,50 to 1.3.52** with regard to:

- The proposal is NOT in a *"town centre, opportunity areas or an intensification area, or is surplus industrial land or other large sites<sup>103</sup>"*
- Did not consider *"planned public transport connectivity (PTAL)"*

- Did not consider the loss of "residential and environmental quality"
- Did not consider the "scheme's overall contribution to local 'place making'"
- Did not consider "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;"
- Did Not consider whether "the proposal is in the types of accessible location the London Plan considers appropriate for **higher density development** (e.g. town centres, opportunity areas, intensification areas, surplus industrial land, and other large sites)."

The applicant has given **NO specific 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**.

**As Stated in the current adopted London Plan Policy 3.4 Optimising housing potential, Development Proposals which compromise this policy, "should be resisted".**



### **Illustration of excessive Housing and Residential Densities for Approved Applications in the MORA Post Code Area**

This is the current adopted London Plan Planning Policy. The applicant has **NOT** provided any reasonable **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) paras 1.3.50 to 1.3.55**.

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We therefore request that this application be refused on grounds of inappropriate **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.

### **Policy 3.5 Quality and Design of Housing Developments Minimum Space Standards Table 3.3.**

Compliant except for **Flat 8** which has only **1.2m<sup>2</sup>** built-in Storage space rather than the required minimum space standard of **1.5m<sup>2</sup>** built-in Storage for a 1-bed, 2-person, single storey dwelling. Could be resolved by "condition".

### **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 possible car ownership for this proposed development is set out below:

**The Car parking allocation per dwelling is NOT a sensible or realistic measure of car ownership as dwellings don't drive cars but their occupants do.** It is therefore unacceptable to have a parking allocation of just **8 spaces** for **26 occupants** giving a parking allocation of 0.31 spaces per occupant at a locality of PTAL 1a.

See:

<https://www.ons.gov.uk/peoplepopulationandcommunity/personalandhouseholdfinances/expenditure/datasets/percentageofhouseholdswithcarsbyincomegrouptenureandhouseholdcompositionuktablea47>

	Occupants	Likely Car ownership
Flat 1	2	1
Flat 2	5	2
Flat 3	2	1
Flat 4	4	2
Flat 5	4	2
Flat 6	4	2
Flat 7	3	1
Flat 8	2	1
<b>Totals</b>	<b>26</b>	<b>12</b>

At the appropriate ranges of Residential & Housing Densities at this setting at PTAL 1a with an average of 3.75 hr/u at Residential Density  $\approx$  183 hr/ha and Housing Density  $\approx$  56.5 units/ha the current London Plan Policy 6.13 Recommends up to 2 spaces per Unit thus requiring 16 car parking spaces for this development proposal. This does not include any commercial vehicles owned by a resident for their employment or business activities.

## 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	
	150-200 hr/ha	Parking provision	150-250 hr/ha	Parking provision	200-350 hr/ha	Parking provision
<b>Suburban</b>	3.8-4.6 hr/unit	35-55 u/ha	35-65 u/ha	45-90 u/ha	45-90 u/ha	
	3.1-3.7 hr/unit	40-65 u/ha	40-80 u/ha	55-115 u/ha	55-115 u/ha	Up to one space per unit
	2.7-3.0 hr/unit	50-75 u/ha	50-95 u/ha	70-130 u/ha	70-130 u/ha	
<b>Urban</b>	3.8-4.6 hr/unit	35-65 u/ha	45-120 u/ha	45-185 u/ha	45-185 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	55-225 u/ha	
	2.7-3.0 hr/unit	50-95 u/ha	70-170 u/ha	70-260 u/ha	70-260 u/ha	
<b>Central</b>	3.8-4.6 hr/unit	35-80 u/ha	65-170 u/ha	140-290 u/ha	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	175-355 u/ha	
	2.7-3.0 hr/unit	50-110 u/ha	100-240 u/ha	215-405 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-site<sup>3</sup>  
 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.

The Overspill car parking would be either in Tower View which is a narrow 7.25m width, unadopted road without footpaths (as measured on Google Earth) or in Woodmere Avenue.

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 noted that the emerging **Draft New London Plan at Table 10.3** has reduced residential parking at **PTAL's 0 to 1**, to **1.5 spaces** per dwelling which for this proposal would require a minimum of **12 Parking Bays** which exactly equals the likely requirement. However, this Draft Plan is subject to **Examination in Public (EiP)** by the **Planning Inspectorate** and is unlikely to be adopted until **early 2020**.

There is no legislation to prevent car ownership or to restrict occupants from owning light vans for commercial for business activities which requires local parking overnight. We therefore object to this proposed development on grounds of inadequate parking provision of only **8 bays** with allocation of only **0.31 bays per occupant**, in a locality of **PTAL 1a** and at an area of local parking medium stress.

Recent piecemeal development in the MORA Post Codes has increased local residential population by close on **500** (including other recent current proposals awaiting determination). This requires an increase in local PTAL to meet the increased **Housing and Residential Densities** in the locality as illustrated by the histogram with trend line showing “The cumulative effects of ignoring the Density ranges given at Policy 3.4” (see Histograms above).

### **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:

- a. The development pattern, layout and siting;
- b. The scale, height, massing, and density;**
- c. 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 **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, or DENSITY” – Therefore to meet this NPPF requirement we revert to the London Plan Policy 3.4 Optimising Housing Potential as set out above.

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

**NPPF (2018 & 2019)**

**16 Plans should:**

*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)

*e) be accessible through the use of digital tools to assist public involvement and policy presentation;*

and at 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 3.4 Density Matrix Table 3.2** 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**.

**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** fronting Tower View of the proposed development which is contrary to **Policy DM10.2** Shown to be screened by Shrubs it is not stated the variety of shrub or height of a matured specimens to afford adequate screening to meet the policy requirement.

**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 complaint 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)**. So, the policy is **undeliverable**.

#### **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.**

**In Addition:**

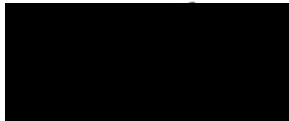
The siting and layout of the development would not respect or improve the existing pattern of buildings and the spaces between them and would appear a dominant and poorly designed element in the street scene.

The development would be detrimental to the amenities of the occupiers of the adjoining properties by reason of loss of light, loss of outlook, visual intrusion and overbearing impact.

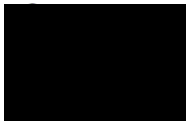
Please list our representation on the on-line public register as **Monks Orchard Residents' Association (Objects)** such that our members and local residents are aware of MORA's support.

Please inform us at [planning@mo-ra.co](mailto: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  
Cllr. Sue Bennet  
Cllr. Richard Chatterjee  
Cllr. Gareth Streeter

Croydon Central  
Head of Development Management (LPA)  
Shirley North Ward Councillor  
Shirley North Ward Councillor  
Shirley North Ward Councillor

**Bcc:**

MORA  
Local Residents  
Interested Parties

Executive Committee