

*Monks Orchard Residents' Association  
Planning*

Sarah Jones MP (Croydon Central)  
43 Blackhorse Lane,  
Croydon  
CR0 6NL

*17th July 2019*

**Case Ref: SJ6615**

Dear Sarah

Thank you for your response to our email of 4<sup>th</sup> June, we were preparing a follow-up as your email arrived. We appreciate that you care passionately about making sure everyone has a home, and we understand that we face a major housing crisis. We could identify some historical reasons why this situation has arisen – but that would be rather political, MORA is apolitical. You have indicated that planning policies and procedures should not be compromised, which is our point precisely.

You state that you fully appreciate the concerns we expressed about the need to preserve the quality of our neighbourhoods as highlighted in many of our objections and that you are always ready to hear such points of view and act on them on a case by case basis where appropriate, but as we indicated in our email, we have not seen any evidence of this thus far.

Your point about Targets set by the Mayor of London has been raised previously in submissions to the Mayors Examination in Public of the new draft London Plan and in representations that targets have been set based upon the availability of existing public transport infrastructure and not on ratios of area or current populations. For example, Bromley has nearly three times the area of Croydon and >14% less population but has an approximate 52% lower target than Croydon which seems a bit imbalanced. (See Table 4.1 – Draft London Plan). We understand the reason for this imbalance is that Croydon has much better transport links than other London boroughs - but if that is the reason, this imbalance will never be rectified until other London boroughs' transport links are improved!

**Extract Table 4.1: 10-year targets for net housing completions (2019/20 -2028/29)**

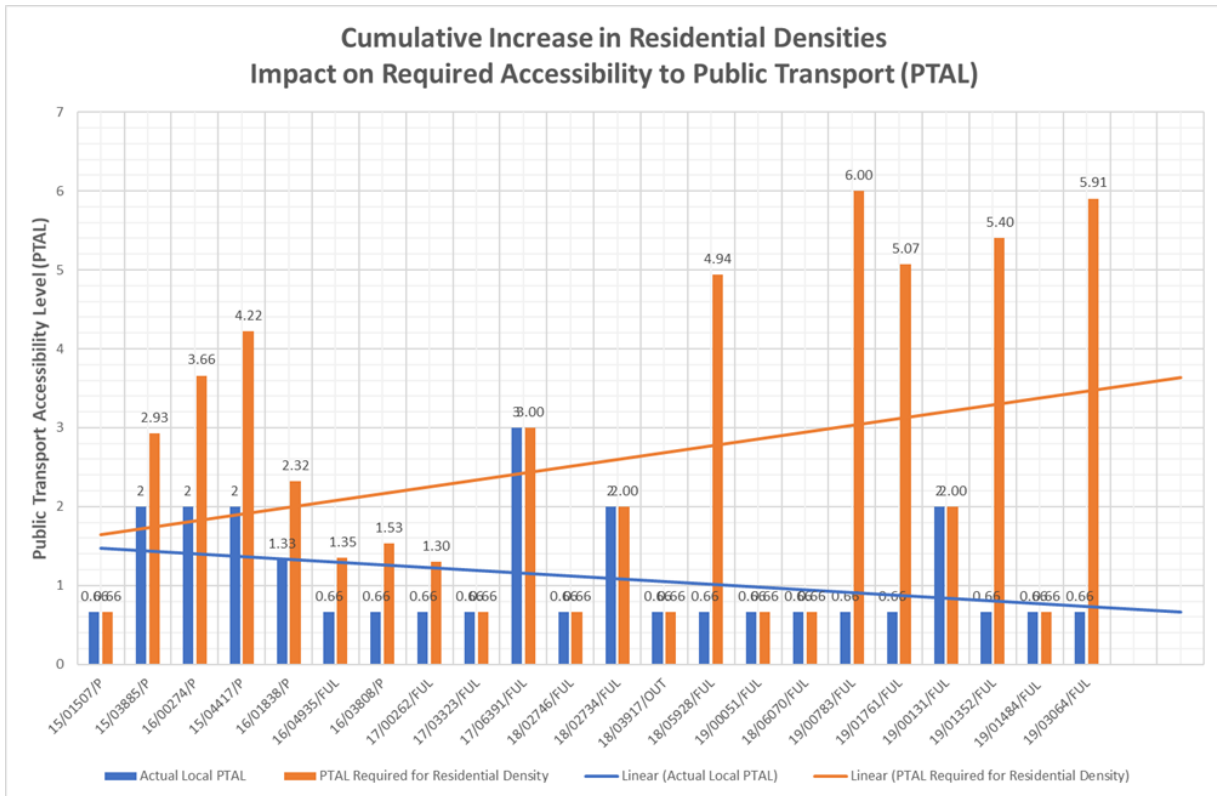
Planning Authority	Ten-year Housing Target	Annualised average
Bromley	14,240	1,424
Sutton	9,390	939
Croydon	29,490	2,949

Planning Authority	Area in sq. km.	Population (2017)
Bromley	150.15	329,391
Sutton	43.85	203,243
Croydon	86.52	384,837

Local Authority	LA Comparison	Area (sq.km.)	Population
Croydon	Bromley	+73.544%	-14.408%
Croydon	Sutton	-49.318%	-47.187%

We do challenge emphatically that any of the recent developments in the Shirley Ward have actually reduced the homeless on the housing waiting list in Croydon, a fact which has been promulgated by members of the Planning Committee on numerous occasions. The sale of these properties are totally unaffordable for those waiting to be housed as well as for many who are already on the property ladder. The only way to reduce homelessness in Croydon is to build subsidised Council Houses for affordable rent.

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 we need these developments because Croydon has a high number of applicants for these properties who are on the housing waiting list – but these development dwellings are never occupied by people on the waiting list as a) they are too expensive, b) these dwellings are purchased by people from outside our waiting list catchment area and c) possibly, purchased by overseas buyers for leasehold renting. This interpretation of policies to meet housing needs or targets are definitely not sensible Planning Policies for Croydon’s homeless.



**Illustration of excessive cumulative PTAL Requirement (Due to Excessive Residential Densities above the Local PTAL available) for MORA Approved Applications.**

We have had a significant number of residential planning applications recently for in-fill or redevelopment of sites, none of which fully meet either the London Plan, the Croydon Local Plan Policies or the Supplementary Planning Guidance SPD2 Suburban Residential Developments guidance as detailed in our MORA Comment letters for each of these applications.

You state that we do need proper and rigorous scrutiny and that you will take every case brought to you on its merits as we have done on numerous occasions and, if appropriate, you will raise concerns with senior members of the council that you would not support developments which alter the character of a local area but we have NOT seen any evidence that you have done so for any of the recent development proposals in Shirley Wards as listed in my email of 4<sup>th</sup> June.

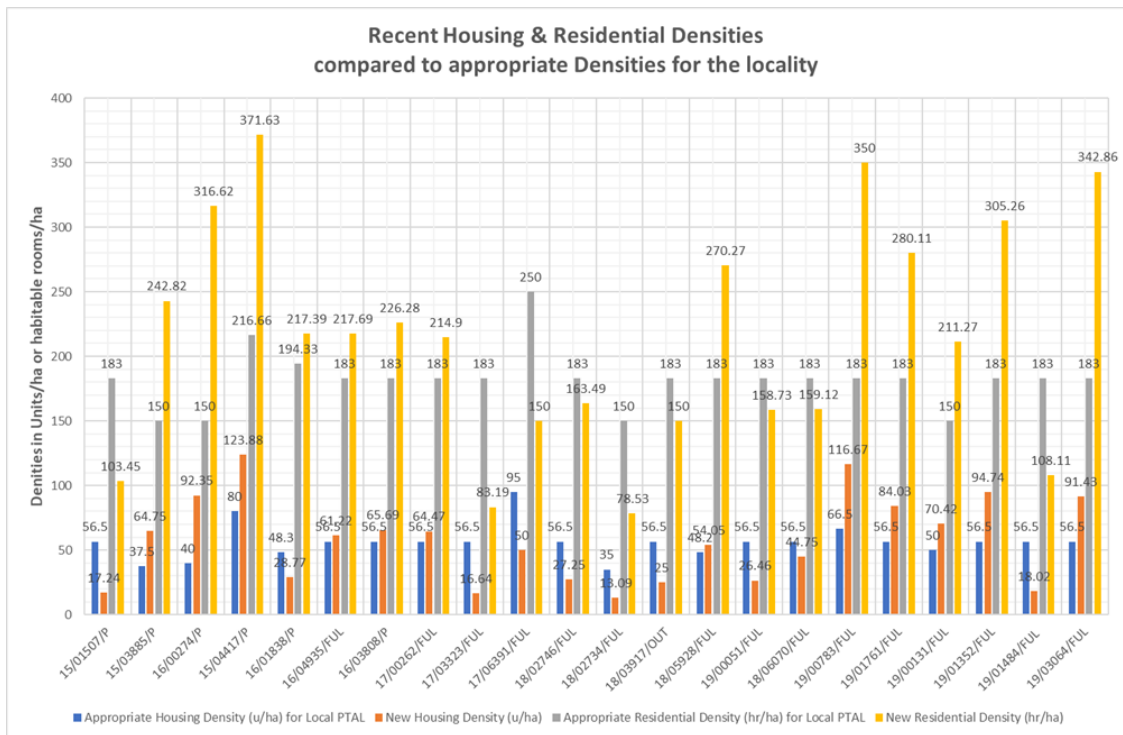
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We only object to proposals that are **non-compliant** to adopted planning policies but although we have copied all our very detailed comments letters, listing many non-compliant policies to you, we have received no acknowledgement to say whether you support MORA or your affected constituents to request these non-compliant applications be either refused or to request that the developers reapply with proposals that fully meet the agreed planning policies. All we are asking is that there is more rigorous compliance to existing planning policies both by Planning Officers and the Planning Committee – the current methodology of determinations seems to be to obfuscate and use meaningless methodology to circumvent any reason for a refusal, irrespective of the policies drafted at enormous expense by the Spatial Management Team – only to be disregarded.

See:

<http://www.mo-ra.co/planning/> for our monthly planning reports, and  
<http://www.mo-ra.co/planning/planning-complaints/> for planning Complaints  
 and specifically: Ref: 18/05928/FUL (CASE 4893951)

We understand the need for more housing units but, to have the support of the affected communities and local residents, these new homes need to respect the planning policies to ensure acceptable accommodation standards for future occupants and that the dwellings meet the policies to respect local character in which they are destined. In addition, the proposals should reflect the available and forecast public transport infrastructure, local massing and densities (See Histograms above and below).



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

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, during this period, lost two GP surgeries resulting in many complaints of increased delays in obtaining appointments. If the appropriate Housing and Residential Densities are NOT observed, the public support infrastructure and Public Transport accessibility becomes oversubscribed at the unacceptable higher density localities and cannot meet the required demand.

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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, frequently becoming full to capacity as they travel through the residential area and do not stop to pick up further waiting passengers as they proceed. This is exacerbated by some residents having a 15 to 20min walk to the nearest 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.

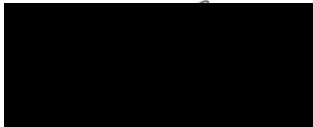
The Wickham Road (A232) is getting very congested and is approaching severe grid-lock at peak periods and there is little that can be done to remedy this situation becoming worse as the road capacity is nearing its maximum as traffic approaches Addiscombe Road toward central Croydon. The locality has not seen any improvement of infrastructure from Community Infrastructure Levy (CIL) contributions from any recent developments and therefore the 'CIL' collected has not contributed to Shirley Wards locality's lack of services and infrastructure.

We keep hearing statements to the effect that improved infrastructure follows developments but we cannot see any evidence of this in our area.

TfL are NOT proposing to improve public transport accessibility at this location prior to 2031. The cumulative uncontrolled high Residential Density developments are increasing public transport occupancy to the extent that further usage is limited by capacity and users revert to other means of transport – their car.

We would be grateful if you would raise all of our concerns when you meet with the Labour Planning Commission and inform us of their recommendations.

Kind Regards



Derek Ritson

**Derek Ritson I.Eng. M.I.E.T.**

**MORA Planning**

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Bcc:

Mora Executive Committee  
Local Shirley Councillors  
Shirley Planning Forum  
Interested Parties