

To: Complaints Resolution Team  
Pete Smith – Head of Development Management  
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Croydon  
CR0 1EA

**Monks Orchard Residents'  
Association  
Planning**

13<sup>th</sup> January 2020

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## **Corporate Complaint (Stage 2)**

**56 Woodmere Road (LBC Ref 19/01352/FUL) (CAS-123091-Y3J7R2)**

Dear Mr Smith and Complaints Resolution Team

Thank you for your response of 18<sup>th</sup> December 2019 to our Stage 1 (**CAS-123091-Y3J7R2**) complaint in respect of the Case Officer's Report regarding the Planning Committee's decision for Demolition of a single-family dwelling and erection of a 3- storey block containing 2 x 3- bedroom and 7 x 2-bedroom apartments with associated access, 9 parking spaces, cycle storage and refuse store (amended plans and description).

I concur that these recent Complaints are rather repetitive, but that is because our fundamental concerns have NOT been adequately resolved. We only raise Complaints if there is sufficient evidence that Planning Policies are being ignored "**without reasonable justification for so doing**" as there is NO opportunity to appeal against an approved application and we do NOT have funds to support a Judicial Review.

Our Complaint CAS-123091-Y3J7R2 comprised the following issues:

- 1 Failure to apply the current adopted **London Plan Policy 3.4 to Optimise the Housing Potential** or the consolidated emerging **London Plan Policy D1A - Infrastructure requirements for sustainable densities**, in accordance with the Policy on Residential and Housing Density appropriate for the available or forecast **Public Transport Accessibility** for the locality at a 'suburban' setting and at **PTAL of 1a**, as required by **NPPF (2018/19) para 122 - Achieving Appropriate Densities**.
- 2 Failure to consider the overbearing nature of the proposed development with regard to loss of amenity to the adjacent property at **54 Woodmere Avenue** as defined by **Policy SPD2 Figure 2.11c**: Height of projection beyond the rear of neighbouring properties to be no greater than **45° degrees** as measured vertically from the middle of the ground floor window of the closest habitable room on the rear elevation of the neighbouring property should NOT intersect the proposed development.
- 3 Failure to adequately consider the **loss of natural light** due to the closeness and overbearing nature of the proposed development on the living conditions of the occupiers of **54 Woodmere Avenue** and failure to acknowledge and correct the **errors** in the **applicant's daylight study report**.

4 Overbearing massing of proposed development in relation to surrounding properties.

5 Infraction of Planning Policies on grounds that it is more imperative to meet housing targets than to countenance and implement adopted Planning Policies.

**Complaint #1** Failure to apply the current adopted **London Plan Policy 3.4 to Optimise the Housing Potential** or the consolidated emerging **London Plan Policy D1A - Infrastructure requirements for sustainable densities**, in accordance with the Policy on **Residential and Housing Density** appropriate for the available or forecast **Public Transport Accessibility** for the locality at a **'suburban' setting and at PTAL of 1a**, as required by **NPPF (2018/19) para 122 - Achieving Appropriate Densities**.

### Your Response:

#### My Findings

*"In many ways these issues have been previously raised and responded to – covering previous complaints into other development proposals in and around Shirley; a number of which have also been investigated by the Local Government Ombudsman. In all cases, the Local Government Ombudsman has found in favour of the Council with no evidence of maladministration. I would respectfully suggest that there is no evidence of maladministration in this case."*

#### Housing Density Matrix

*"The Housing Density Matrix was introduced as part of the First London Plan back in 2004, well before the introduction of the National Planning Policy Framework and the realisation of the current pressures being placed on London Boroughs to deliver exceptionally challenging housing targets and the requirement to maintain a 5-year housing supply for the foreseeable future. It has been long considered that the Housing Density Matrix is no longer fit for purpose and whilst it is appreciated that it remains part of the London Plan (in its current iteration) its weight (as a material planning consideration) is relatively limited. As you will be aware, the supporting text advises that a consideration of housing density is only the start of planning housing development; not the end and it would be unacceptable to apply the density matrix mechanistically.*

*You will be aware that the London Plan Panel Report has been issued by the Planning Inspectorate which supports the intended deletion of the density matrix. The Panel concluded (notwithstanding the level of comment from the likes of yourselves) that the matrix is fundamentally in conflict with the design led approach now advocated – which sees density as an output and not as an input when determining the form and type of new development. Critically, it advises that enforcing a strict upper limit on density runs the risk of stymying otherwise acceptable development which would run contrary to the strategy of Good Growth.*

*The London Mayor's response to the Panel Report has been recently published yesterday and a design-led approach to density has been re-affirmed."*

### Our Response:

Our experience with the Local Government Ombudsman has shown that the LGO will only consider complaints which have caused a person making the complaint a *"personal injustice"* and will not consider complaints from Residents' Associations on behalf of residents' unless full

details and affidavit are provided for anyone on whose behalf we are representing. The Ombudsman must have their explicit “*consent*” to investigate on their behalf. The Ombudsman will NOT investigate complaints that an LPA is not following adopted Planning Policies unless we can make a case that it has resulted in personal injustice to “*a resident*”. We are currently making representations to the **Minister of Communities and Local Government** on this anomaly which has been delayed due to the dissolution of Parliament for the General Election and the Christmas/New Year break.

## The draft London Plan

The information on the Mayor of London website attempts to provide guidance on how much **weight** the draft London Plan should have in any current planning decisions.

[https://www.london.gov.uk/sites/default/files/inspectors\\_report\\_and\\_recommendations\\_2019\\_final.pdf](https://www.london.gov.uk/sites/default/files/inspectors_report_and_recommendations_2019_final.pdf)

states:

***The current 2016 Plan (The London Plan consolidated with alterations since 2011) is still the adopted Development Plan, but the Draft London Plan is a material consideration in planning decisions. The significance given to it is a matter for the decision maker, but it gains more weight as it moves through the process to adoption.***

The draft London Plan underwent its external examination in Public (EiP) during the first half of 2019. The Inspector’s Report published formal comments on the **Draft London Plan on Oct 8<sup>th</sup> 2019**.

The policies as adopted are valid and the emerging policies to replace the current adopted policies are also valid (NPPF para 48) and are published and as such are the appropriate grounds for basing our observations and criteria for observance when applying those policies to development proposals.

Your responses to our complaints do not answer the fundamental questions to satisfactorily resolve the complaints as we will try to set out below:

The repetition relates to proposals which have densities which do not accord with the **availability of supporting infrastructure** which the current London Plan defines by the **Density Matrix** and the **New (emerging) London Plan** (Draft London Plan – consolidated changes version–Clean July 2019) defines by **Policy D1A Infrastructure requirements for sustainable densities**.

You regularly state that the current London Plan Policy Panel concluded (notwithstanding the level of comment from the likes of ourselves) that the matrix is fundamentally in conflict with the design led approach now advocated – which sees density as an **output** and not as an **input** when determining the form and type of new development. **Critically**, it advises that “*enforcing a strict upper limit on density runs the risk of stymying otherwise acceptable development which would run contrary to the strategy of Good Growth*”.

The Inspectors Panel Report on the Examination in Public of the draft London Plan was published on 8<sup>th</sup> October 2019 and a “**design-led approach**” to density has been re-affirmed.

However, **crucially** the “**Design-led-approach**” requires consideration of the parameters which have a fundamental input to the “**design**” which considers the appropriate supporting “**infrastructure**” and the “**local character**” to allow any proposed development to be “**sustainable**”. It is these **crucial concepts of the “design-led-approach” and “design” limitations** that you continually disregard which is why we continually raise these questions and complaints.

### The Inspectors Report States:

275. This suite of policies provides a sequence of considerations to assist in the delivery of well-designed development, at an “**appropriate density**”, that responds to **local character**, form and **infrastructure capacity**. They are aimed to put design at the **core of plan making** and decision taking. In short, they require boroughs to determine a local plan’s **spatial strategy** to meet its growth requirements based on a thorough understanding of the character of the plan area. Identified **infrastructure deficiencies** should be addressed and **optimised site capacities** established for **all site allocations** and other development proposals, through the exploration of design options.
285. Subsequent policies relate to the **site-specific** context. **Policy D1A seeks to ensure that density of development proposals** respond to **future infrastructure capacity** and that it should be **proportionate to a site’s accessibility and connectivity**. Policy D1A part D introduces further suggested changes that set out explicitly that **infrastructure capacity ultimately will limit the scale of development** where it cannot be enhanced to mitigate the impact of development. This will ensure that the **density of a development cannot exceed a sustainable level**, even if it is acceptable in design terms. It will also help to ensure that development accords with Good Growth.

### Policy D1A - Infrastructure requirements for sustainable densities

- A The density of development proposals **should:**
- 1) **consider, and be linked to, the provision of future planned levels of infrastructure** rather than existing levels,
  - 2) **be proportionate** to the site’s **connectivity and accessibility** by walking, cycling, and **public transport** to jobs and services (including both PTAL and access to local services <sup>22A</sup>).
- B Where there is currently **insufficient capacity of existing infrastructure to support proposed densities** (including the impact of **cumulative development**), boroughs should work with applicants and infrastructure providers **to ensure that sufficient capacity will exist** at the appropriate time. This may mean, that if the development is contingent on the **provision of new infrastructure**, including **public transport services**, it will be appropriate that **the development is phased accordingly**.
- C When a proposed development is acceptable in terms of use, scale and massing, **given the surrounding built form, uses and character, but it exceeds the capacity identified in a site allocation** or the site is not allocated, and the borough considers the **planned infrastructure capacity will be exceeded**, additional infrastructure **proportionate to the development** should be delivered through the development. This will be identified through an infrastructure assessment during the planning application process, which will have regard to the **local**

infrastructure delivery plan or programme, and the CIL contribution that the development will make. **Where additional required infrastructure cannot be delivered, the scale of the development should be reconsidered to reflect the capacity of current or future planned supporting infrastructure.**

**How do you therefore justify the Residential and Housing Density of the proposal when you have NOT assessed the appropriate requirements of paras A, B or C of the New London Plan Policy D1A set out above to ascertain whether the proposal is **SUSTAINABLE taking account of cumulative developments and planned future supporting infrastructure, including PTAL?****

These **new requirements** are **NEVER** considered by the Case Officer(s) in order to determine whether a proposal meets these parameters for the “**Design Led Approach**” – to establish if the proposal is “**SUSTAINABLE**” in terms of **available and/or planned supporting infrastructure!**

As the Croydon LPA NEVER consider individual proposals against these criteria, the cumulative **unsustainability** of many recent developments is a cause for **legitimate significant concern** to us and our local residents. You seem to pick and choose only those policies and parts of those policies that allow **uncontrolled densities** to be accepted which **significantly undermines** the policies and the **management of development proposals in the borough.**

These new **London Plan Policies** are a reflection of the **NPPF guidance at Para 122.**

#### Achieving appropriate densities

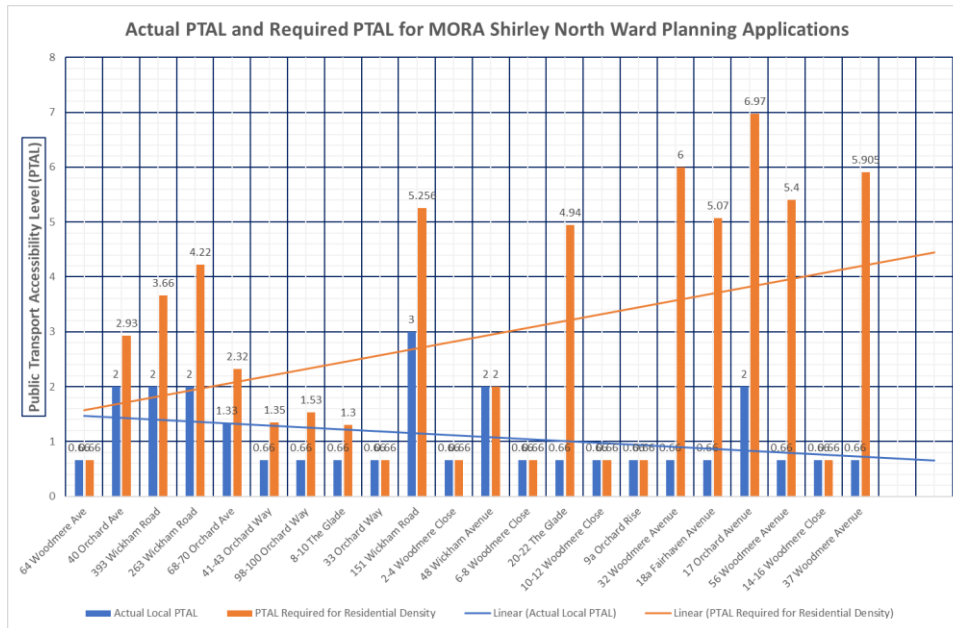
122. Planning policies and decisions should support development that makes efficient use of land, taking into account:

- a) the identified need for **different types of housing** and other forms of development, and the availability of land suitable for accommodating it;
- b) local market conditions and viability;
- 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;
- d) the desirability of **maintaining an area’s prevailing character and setting** (including residential gardens), or of promoting regeneration and change; and
- e) the importance of securing well-designed, attractive and healthy places.

Which means:

- a) **Not All “Flatted” developments, but a suitable mix to meet requirements of a cross section of housing needs, with sustainable infrastructure;**
- c) the availability of public Transport Accessibility and other services i.e. **sustainable infrastructure;**
- d) the existing character and setting (suburban urban etc) i.e. **maintaining an area’s prevailing character and setting.**

**The cumulative effect of ignoring the policy is shown on our recorded histogram below which you have yet to acknowledge:**



**Excessive PTAL Requirement above the Local available PTAL (Based upon TfL WebCAT) due to Increased Densities of Applications in the MORA Post Code Area showing the ongoing PTAL linear trend.**

Instead of regularly responding that the **Density Matrix** is not now an appropriate policy, and ignoring our recorded histogram which illustrates the PTAL requirements of **cumulative developments**, would it not be possible for you to acknowledge there is a **replacement policy** which requires **consideration** and **evaluation** which defines parameters for input into a **“design led approach”** to ensure **sustainable developments** to take account of **available and planned infrastructure!** We might **NOT** then have to Complain so regularly.

**Complaint #2** Failure to consider the overbearing nature of the proposed development with regard to loss of amenity to the adjacent property at **54 Woodmere Avenue** as defined by **Policy SPD2 Figure 2.11c**: Height of projection beyond the rear of neighbouring properties to be no greater than 45° degrees as measured vertically from the middle of the ground floor window of the closest habitable room on the rear elevation of the neighbouring property should NOT intersect the proposed development.

**Impact on 54 Woodmere Avenue**

The Suburban Design Guide is (as the name suggests) treated as guidance and it is not a “rule book”. It seeks to provide guidance on what might be acceptable (in terms of the relationship between the scale and mass of buildings and neighbouring windows – and how that scale might affect the character and appearance of an area). Every case needs to be considered on its own merits which means that the guidance contained within the SPD should be considered on a case by case basis and I am satisfied that this approach was followed in this particular case.

## The introduction to SPD2 Chapters 1 - Introduction para 1.1 & Chapter 2 – para 2.1 Suburban Residential Development states:

### 1.1 OVERVIEW OF THIS DESIGN GUIDE

1.1.1 This design guide provides guidance for suburban residential developments and extensions and alterations to existing homes across the borough. It is a Supplementary Planning Document (SPD) which **“should” be used by residents, developers, builders and agents including architects and planning consultants in shaping development proposals**, and will **assist in making decisions on planning applications** and inform the Council’s pre-planning application service. Beyond providing technical design guidance, this guide sets out how residential development, including extensions and alterations, in neighbourhoods across the borough is part of a **holistic strategy being driven by the Council to deliver tangible public benefits to suburban communities**.

### 2.1 SUBURBAN DEVELOPMENT

2.1.1 This section of the SPD is **relevant** to the **delivery of new homes** through conversion or **redevelopment of existing properties** or new housing built in rear gardens and back lands.

2.1.2 The Croydon Local Plan has identified that some existing residential areas have the capacity to accommodate growth without significant change to its character. In these locations, to accommodate the target for additional homes in the suburbs, new residential units may be created through the interventions described in Figures 2.1a – 2.1e.

2.1.3 These approaches to development are set out in Table 6.4 of the Croydon Local Plan and the supporting text. The guidance set out in this section responds to Policies DM10.1 – DM10.10 of the Croydon Local Plan regarding design and **density**, including ensuring growth is accommodated **without significant change to the character of an area**.

### Our Response:

It is **inappropriate** to have a **Design Guide** that is **NOT** used for **“design guidance”** and can be ignored on the whim of a case officer. This is very dangerous as it means the **“Design Guidance”** is subject to varying degrees of **interpretation and can be ignored without justification or a defined criterion**. A very subjective determination allows case officers to ascertain whether or not these **guides** are **enforced** or **overlooked** which in turn places Case Officers at pressure of collusion or at worst corruption when significant financial commitments are at stake.

### There are TWO separate aspects to SDP2 section 2.11

**2.11.1** Where a development projects beyond a rear building line, the height and footprint of the projection does not necessarily need to be lower or narrower, provided the guidance on relationship to boundaries (Refer to Section 2.16) and overlooking (Refer to Section 2.9) is followed. It should be demonstrated that there would be **no unreasonable impact on neighbouring amenity**. Where it is necessary to mitigate impact on neighbouring amenity, the projection beyond the rear building line may need to **step down in height and width**, to meet the guidance below:

- It follows the 45 degrees rule demonstrated in **Figure 2.11b** and **2.11c**. In exceptional circumstances, where **orientation, topography, landscaping and neighbouring land uses allow**, there may be scope for a depth beyond 45 degrees.

- The flank wall is designed to minimise visual intrusion where visible from neighbouring properties.

**2.11.2** Applicants should **also**<sup>[1]</sup> refer to the guidance on **Daylight and Sunlight** (Refer to Section 2.9), where there would be **unreasonable impact on neighbouring access to natural light**, the **depth of a projection beyond the rear building line should be reduced**. The design of a flank wall visible from neighbouring properties should be carefully designed to minimise visual intrusion.

**2.11.3** Where stepping the **height and width of a building**, care should be taken as a stepping form can dilute the massing and architectural merit of a proposal. This in itself may draw more attention to the proposal through complicating form. Where **stepping would overly complicate** the form and create more visual intrusion on neighbouring amenity as demonstrated in Proposal 3 on pages 44 - 45, no stepping should be introduced and an **overall smaller footprint that does not require stepping may need to be provided**.

#### Our Response:

This seems **eminently sensible** **“GUIDANCE”** which however seems to be ignored on the whims<sup>[2]</sup> of a case officer. There is no stated tolerance in the SPD2 guidance – it either passes or it fails. So why bother expending all that (Tax Payers) money producing what was supposed to be an **“award-winning document”** by the Spatial Planning Team when its content is invariably ignored **without qualified justification?**

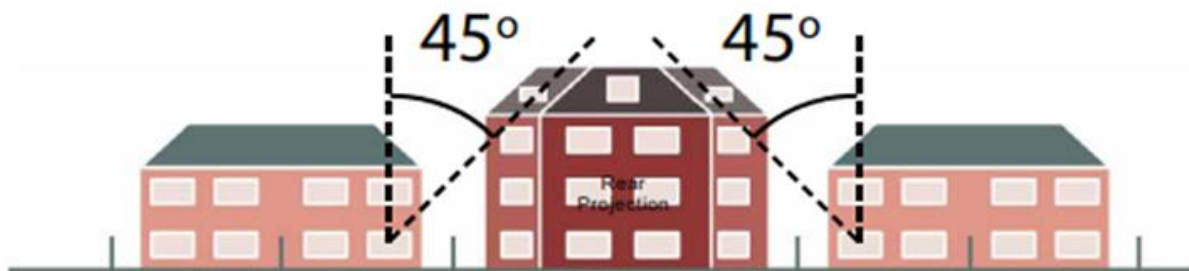


Figure 2.11c: Height of projection beyond the rear of neighbouring properties is no greater than 45 degrees as measured from the middle of the window of the closest ground floor habitable room on the rear wall of the main neighbouring property on both sides.

Note: The proposal is to be sunk into a **≈0.6m Hole in the ground** to mitigate overall height but **still fails the 45-Degree rule**. (If the final built form does **not** respect this base level submergence of **≈0.6m** – the intersect would be significantly worse!)

[But it seems that this can be ignored by Case Officers without any **JUSTIFICATION!**].

[1] Adverb **“Also”** *in addition; too; besides; as well as; likewise; in the same manner*.

[2] A sudden desire or change of mind, especially one that is unusual or **“unexplained”**.





**Failure of proposal to meet the SPD2 required 45° Degree (Vertical) Rule 2.11c) for adjacent property amenity and also Daylight accessibility**

There was NO quoted justification based upon “orientation”, “topography”, “landscaping” or “neighbouring land uses” to allow relaxation of the Policy and NONE were identified as reasons for relaxing the requirement of the 45-Degree (Vertical) Policy, There were NO “exceptional circumstances” for scope for an intercept beyond the 45° vertical projection.

**Complaint #3** Failure to adequately consider the loss of natural light due to the closeness and overbearing nature of the proposed development on the living conditions of the occupiers of 54 Woodmere Avenue and failure to correct the errors in the applicant’s daylight study report.

**You responded:**

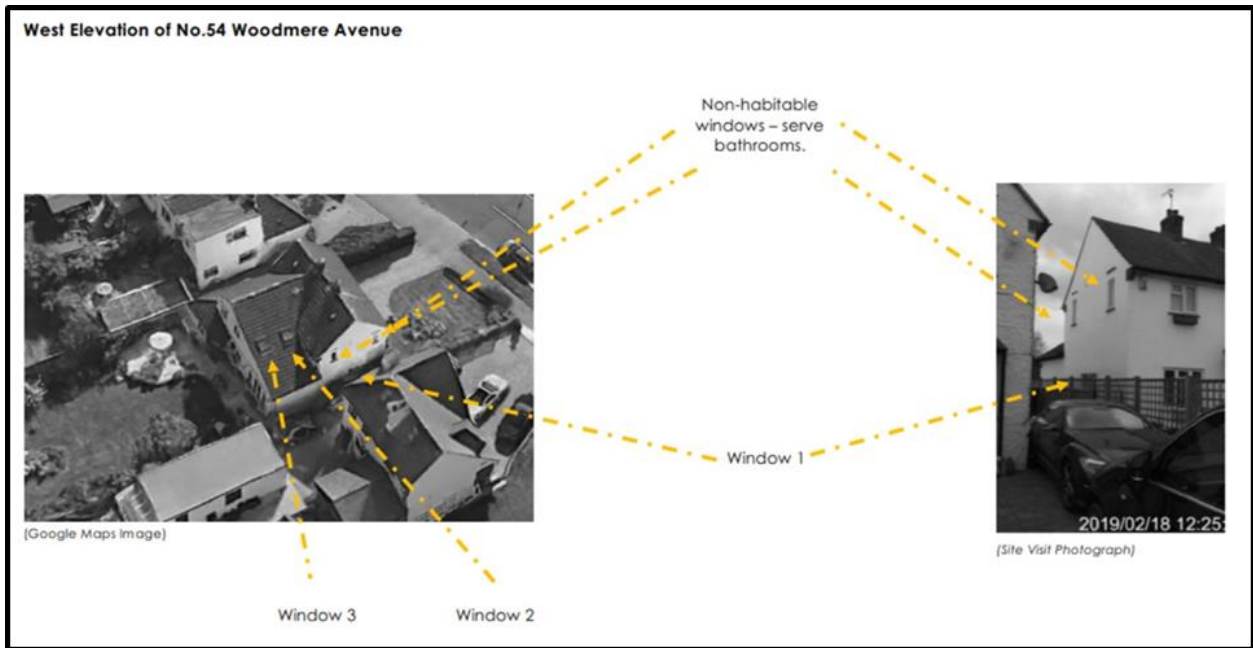
*“The planning application was supported by a daylight and sunlight assessment which concluded that the neighbouring property would maintain reasonable light levels in compliance with BRE Guidance. The Suburban Design Guide highlights a “rule of thumb” approach to daylight and sunlight, which is the purpose of the high level 45-degree analysis; with angles taken vertically and horizontally from a neighbouring window. In this particular case we required the applicant to prepare a daylight and sunlight report, in view of the issues which have been raised previously by local residents. Officers concurred with the conclusions of this assessment which helped dispel any suggestion that the scheme was sufficiently harmful to daylight and sunlight to warrant refusal of planning permission. Lack of significant harm also helped dispel any suggestion that the scheme was over-dense.”*

**Our Response:**

Officers concurred with a conclusion based upon erroneous information!

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**Applicant's Erroneous Assessment**

You have **NOT** acknowledged that the Daylight Study evidence was **flawed** for two reasons:

- a) The applicant had **mistakenly designated the windows served habitable rooms;** and
- b) The Daylight Study failed to take account of the **small window apertures** which restrict natural light into the **Habitable Rooms** of **54 Woodmere Avenue**.



**Actual Windows and Rooms Served**

No account was taken of these two **extremely important implications** in this case and you have **NOT** acknowledged or responded to these issues raised in our **Stage 1 Complaint**.



Window 6

considered

was NOT

Window	Floor	Dimensions	Window Area	Room Served
Window 1	Ground	139cm x 52cm	0.73m <sup>2</sup>	Lounge
Window 2	1st	59cm x 70cm	0.413m <sup>2</sup>	Bathroom
Window 3	1st	59cm x 70cm	0.413m <sup>2</sup>	Bathroom
Window 4	1st	33cm x 76cm	0.25m <sup>2</sup>	Bedroom
Window 5	1st	33cm x 76cm	0.25m <sup>2</sup>	Bedroom/Study
Window 6	1st	33cm x 76cm	0.25m <sup>2</sup>	Bedroom

**You have completely ignored** our concerns that the Applicant supplied **erroneous information** for **designation** of the affected Windows of **54 Woodmere Avenue** and their **apertures**.

The size of the affected windows at **54 Woodmere Avenue** are **significantly smaller** in area than **standard modern windows** due to the period of build and this has a significant reducing effect of the illuminance of natural light's spectral distribution within the visible range of natural light passing into those habitable rooms. The measured natural illuminance for residential rooms should be between **200 and 500 Lux**. (Lumens) <sup>[3]</sup> **This will NOT be the case once the proposal for 56 Woodmere Avenue has been built.**

**[3]** The lux (symbol: lx) is the SI derived unit of illuminance and luminous emittance, measuring luminous flux per unit area. It is equal to one lumen per square metre. In photometry, this is used as a measure of the light intensity, as perceived by the human eye, of light that hits or passes through a surface.

**Complaint #4      Overbearing massing of proposed development in relation to surrounding properties.**

**Your Response:**

Character Considerations:

*“The character of this part of Shirley is very varied indeed and the scale of development proposed (two storeys with accommodation in the roof) was considered to be totally in **character with the area**. Again, this was fully debated and discussed at Planning Committee and was fully explained and examined in the officer’s report.”*

**Our Response:**

The character of this part of Shirley had **NO Flats** until **32 and 37 Woodmere Avenue** were considered for re-development and the local character prior to those proposals were detached and semi-detached houses and bungalows with large gardens as defined in the “Shirley Place” viz:

**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.**

**Green Grid and Open Space**

**11.204** Shirley will continue to be well served by **open space** with improved connections to the Green Grid, along with way finding, enabling increased walking and cycling. The Registered Historic and Local Historic Parks and **Gardens in the area will be retained** and new links provided where possible to incorporate them into the Green Grid network.

**Complaint #5      Infraction of Planning Policies on grounds that it is more imperative to meet housing targets than to countenance and implement adopted Planning Policies.**

**Your Response:**

Prioritisation of the Planning Balance – Delivery of New Homes

*“I make no apology for seeking to deliver new homes across the borough – which represents a weighty consideration in the planning balance. It is recognised that changes to the “status quo” might have some small-scale effects on the character of areas and the amenities of neighbours. However, I must take issue with your suggestion that we are not implementing adopted planning policy.*

*As previously advised, when determining planning applications, it is important that the decision-taker considers the development plan as a whole, recognising that some policy considerations might not totally align with other issues and approaches. It is for this reason why some decisions are taken in the balance, with greater weight being given to certain consideration over others. In most cases we feel that the need to deliver more housing should reasonably counter density, car parking or amenity effects (unless serious harm is caused by the scale of development for whatever reason). Of the schemes*

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*determined in Shirley, we are satisfied that we have struck the appropriate balance and are content with the scale and effects of the flatted schemes granted to date. I appreciate that this might run counter to your own position (and those of Shirley residents) but I stand by our recommendations to grant planning permission and the eventual decision (invariably taken by the Council's Planning Committee)."*

#### Our Response:

Thus, it is **Development Management's** view that it is preferable to allow **inferior proposals**, which are **inappropriate** to an area and have **unacceptable accommodation standards** in order to **meet housing targets** rather than require applicants to **reassess** their proposals to meet adopted planning policies to provide the **much-needed** housing but of **more appropriate design and supported by the available or planned infrastructure**. If such is the case, why is the Spatial Planning Team bothering to review the **Croydon Local Plan** if the emphasis is **meeting housing targets** in spite of **any policies to mitigate against inappropriate proposals**?

We recognise that more houses are needed and that redevelopment in residential areas may be required to meet that demand. Where we differ is that we believe that **Planning Policies** are defined – **"for a purpose"** – and that purpose is to **ensure**:

- That new dwellings are **sustainable**;
- Have appropriate **accommodation and amenity standards** for future and existing occupiers;
- That dwellings and their residents have appropriate **supporting infrastructure** – including Public Civic Services which include adequate GP Surgeries, schools etc. to support the additional incoming population increase for the area;
- Have appropriate **Public Transport Accessibility** for the additional residents; and,
- Maintain local **character** such that the area retains its character for the existing residential population who have invested their money and dreams to live in such a locality for their wellbeing and livelihood.

We therefore accept redevelopment within the **constraints imposed by the Policies**. Thus, when approvals disregard the policies as we have set out above, we believe proposals should be refused to allow applicants to modify their proposals to fully meet the Planning Policies and re-apply with modified application proposals and thus provide the much needed Housing – **but importantly** – those dwellings are **sustainable** and meet the policies and are **more appropriate** for the locality.

The record of the Planning Committee does NOT seem to be very Policy dependent as the record shows an uncanny number of politically motivated decisions.

The voting record of 6:4 on numerous occasions shows a **biased response** and very infrequently varies from these politically appointed Councillors' results at **6:4 for approval**. The committee members do not assess proposals on policy or locality or proper planning criteria. The only criteria seem to be whether the proposal provides more housing - whether this is the most suitable housing for the future occupants of the proposal or for the existing local residents or character of the locality is NOT considered of any significant importance. The evidence is mounting.

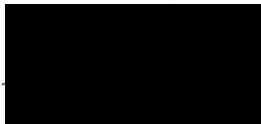
Can you not appreciate that **each Policy** ignored or disregarded **without credible justification** sets a **precedent** which subsequent applicants can allude to for equal reason to disregard or breach the **Policy**, ultimately resulting in a **Local Plan** with **Policies** that **cannot be enforced**.

The **Local Plan Review** consultation might just result in a **Plan** without any possible **enforceable Policies** to **manage development proposals to meet the housing targets** as the policies become **less and less enforceable**.

We (MORA) appreciate your response but it is very distressing that our concerns are not addressed or even considered as reasonable. We are therefore compelled to escalate the complaint to Stage 2 as these issues are fundamental to the concerns of Shirley Residents.

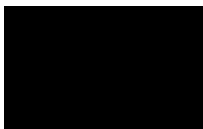
This response has been agreed and authorised by all members of the MORA Executive Committee.

Kind Regards



Derek (MORA Planning Adviser).

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



**Sony Nair**  
**Chairman, Monks Orchard Residents' Association.**

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On behalf of the Executive Committee, MORA members and local residents.

Cc: Sarah Jones MP Croydon Central  
Steve Dennington Head of Spatial Planning (Croydon LPA)  
Steve O'Connell GLA Member (Croydon & Sutton)  
Cllr. Sue Bennett Shirley North Councillor  
Cllr. Richard Chatterjee Shirley North Councillor  
Cllr. Gareth Streeter Shirley North Councillor

Bcc: MORA Executive Committee  
Chair - Shirley Planning Forum (SPF)  
Local Residents & Interested Parties