

Mr D. Ritson,  
Via e-mail only:  
planning@mo-ra.co

complaints@croydon.gov.uk

Our ref: KH/CAS-123091-Y3J7R2  
Date: 10 February 2020

Dear Mr Ritson,

**Stage 2 Complaint – Planning Application Ref: 19/01352/FUL**

I write further to your letter dated 13 January 2020, expressing your dissatisfaction with the Council's response to your Stage 1 complaint relating to the planning application at 56 Woodmere Road. Your complaint has been registered at Stage 2 of the Council's Complaint Procedure and as Executive Director of Place, it is my role to oversee this stage of the procedure.

Firstly, I would like to say that I am sorry you have had cause to complain and that we have not been able to resolve your complaint earlier. I have had the opportunity to review your complaint.

Following receipt of your complaint I reviewed the planning application files and report, and viewed the webcast of the Planning Committee debate in its entirety.

I am aware that you have made previous complaints, relating to other local development proposals, raising similar issues. Having reviewed your complaint on this occasion, I can see that all the issues you have raised have been considered within the Planning Committee report, and were debated at both meetings of the Planning Committee on 1 August 2019 and 24 October 2019. I note that Point 6.4 in the Planning Committee reports details the objections made by the Monks Orchard Residents Association.

The London Plan, together with the Croydon Local Plan, identify appropriate use of land as a material consideration, to ensure that opportunities for development are recognised in order to optimise housing supply. Given that this site is within an established residential area, and currently comprises residential accommodation, the principle of proposing additional residential development on the site was therefore considered acceptable by adopted planning policies and guidance.

In relation to density, Policy 3.4 of the London Plan indicates that, in suburban areas with Public Transport Accessibility Levels (PTALs) of 0-1, an appropriate density would equate to 150-200 habitable rooms per hectare (hr/ha). The density of this proposed development was 251hr/ha, which fell slightly above threshold. However, contained in the subtext of Policy 3.4 is the statement that, *'whilst a rigorous appreciation of housing density is crucial to realising the optimum potential of sites, it is not appropriate to apply the density matrix mechanistically'*. In contrast, Policy DM1.1 of the 2018 Croydon Local Plan advises that developments should generally be a minimum of 3 storeys and in Paragraph 2.1 of the Council's SPD entitled "Suburban Residential Design", it indicates that where surrounding buildings are predominantly single storey, new development should seek to accommodate a third storey within the roof space.

Further clarification for the justification of the acceptability of this density matrix ratio was sought at Planning Committee from Nicola Townsend, Team Leader by one of the Planning Committee members. In addition to this, the car parking provision was also raised for debate and Members accepted that the provision of 1 parking space per unit was considered acceptable for the density.

It was acknowledged that there would be some impact on the lighting in the garden area of the house adjacent to the proposed development, but it was also confirmed that the proposal did not result in neighbouring properties being directly overlooked at close range and that adjoining occupiers will not experience a significant loss of existing sunlight or daylight levels.

As a result of the 45 degree guideline being compromised, it was necessary for the developer to conduct a light analysis survey, which confirmed that the proposal met all BRE guidelines for sunlight. It was also noted at Planning Committee that, due to the direction of the proposed site in relation to the neighbouring property, the direct impact upon the lighting in the rear garden of 54 Woodmere Avenue would not have been greatly affected.

As you are aware, the Complaints Resolution Team are unable to overturn a planning decision as part of the Corporate Complaints process. Whilst I am sorry that this is perhaps not the response you were hoping for, I am satisfied that the decision to grant planning permission for 56 Woodmere Road was sound. The local planning authority stands by the approach adopted in this case and I am content that the scheme was duly presented to the Planning Committee for decision.

Whilst we are under pressure to deliver on our housing targets, I wish to assure you whilst delivering on our 5 year housing supply targets is critical we also need to ensure that a scheme is acceptable in other respects. We determine planning applications on their own merit in accordance with the development plan (taken as a whole), whilst taking into account all other material planning considerations.

Your complaint has been considered at Stage 2. If you remain dissatisfied with the service you have received and specifically the way in which the local planning authority determined this particular planning application you can ask the Local Government and Social Care Ombudsman to consider your complaint.

**By writing to:** The Local Government Ombudsman  
PO Box 4771  
Coventry  
CV4 0EH

**By telephoning<sup>1</sup>:** 0300 061 0614

**By texting:** Text 'call back' to 07624 804 299

**By online form:** [www.lgo.org.uk](http://www.lgo.org.uk)

Yours sincerely



Shifa Mustafa  
Executive Director of Place

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<sup>1</sup> Calls to 03 numbers will cost no more than calls to national geographic numbers (starting 01 or 02) from both mobiles and landlines, and will be included as part of any inclusive call minutes or discount schemes in the same way as geographic calls