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**Monks Orchard Residents'
Association
Planning**

21st May 2021

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Reference:	21/02212/FUL
Application Received:	Thu 29 Apr 2021
Application Validated:	Thu 29 Apr 2021
Address:	34 Woodmere Avenue Croydon CR0 7PB
Proposal:	Demolition of the existing property and the erection of two storey terraced houses with accommodation in the roof space, comprising six dwellings with six off-street car parking spaces.
Status:	Awaiting decision
Case Officer:	Christopher Grace
Consultation Date:	Fri 04 Jun 2021
Decision Deadline:	Thu 24 Jun 2021

Dear Mr Grace

Please accept this letter as a formal objection to Application **Ref: 21/02212/FUL** for Demolition of the existing property and the erection of two storey terraced houses with accommodation in the roof space, comprising six dwellings (3 per Block) with six off-street car parking spaces.

The **Monks Orchard Residents' Association** is registered with the **Croydon LPA** and represents approximately **3,800** households in the **Shirley North Ward**. We only object on grounds of '**non-compliance**' to adopted or '**emerging**' Planning Policies' or to clarify '**ambiguous or vaguely**' worded policies that require interpretation appropriate for the individual proposal. The Text with **Coloured Backgrounds** are the current adopted or emerging Planning Policies relevant to this Application.

Planning History:

Ref: 83/01672/P | Erection of seven, 4-bedroom houses with attached garages | Land R/O 34 & 36 Woodmere Avenue Shirley
Application Withdrawn - Tuesday 15 May 1984

Ref: 84/01378/P | Erection of a four-bedroom house and 5 bungalows with garages, formation of estate road | 36 & R/O 34 Woodmere Avenue Shirley
Permission Granted - Tuesday 05 Oct 1984

Ref: 85/00965/P | Erection of detached three-bedroom bungalow and detached double garage | R/O 34 Woodmere Avenue Shirley
Permission Granted - Friday 31 May 1985

The proposal is for demolition of a family home of an *estimated* **5 habitable Rooms** in a Site Area of **712m² (0.0712ha)** with an *estimated* **Residential Density** of **70.22hr/ha** and a **Housing Density** of **14.04 units/ha**, with two blocks of three, two storey terraced houses with accommodation in the roof space, with a total residential density of 379.21hr/ha (421.35 bedspaces/ha) and housing density of 84.27 units/hectare.

Existing:

34 Woodmere Ave			Residential Density		70.22	hr/ha
Site Area	712	sq.m.	Residential Density		70.22	bs/ha
Site Area	0.0712	ha	Housing Density		14.04	units/ha
Existing	Site Area (ha)	Dwellings	Habitable Rooms (Estimated)	Bedrooms	Bed Spaces (Estimated)	Car Parking Spaces
Bungalow	0.0712	1	5	3	5	2

Table 1 Existing 34 Woodmere Ave Dwelling parameters (where published)

Parameters of proposal:

34 Woodmere Avenue - Application Ref: 21/02212/FUL								Uplift Residential Density		308.99	hr/ha	
6 two storey (accommodation in Roof Space) terraced houses	Dwellings	6	Units	Residential Density		379.21	hr/ha	Uplift Residential Density		351.12	bs/ha	
	Site Area	712	sq.m.	Residential Density		421.35	bs/ha	Uplift Housing Density		70.22	units/ha	
	Site Area	0.0712	ha	Housing Density		84.27	unit/ha	Average Habitable Rooms/l		4.50	hr/Unit	
New	Floor	Bedrooms (b)	Bed-Spaces (Persons) (bs)	Habitable Rooms (*) (hr)	GIA Offered (sq.m.)	GIA Required (sq.m.)	Built-In Storage offered (sq.m.)	Minimum Built-In Storage Required (sq.m.)	Private Open Space (Rear Garden) offered (sq.m.)	Private Open Space (Front Garden) offered (sq.m.)	Private Open Space Required (sq.m.)	Car Parking Space
Unit 1	Ground	0	0	1.5	106.5	99	Not Stated	2.5	41	28.5	8	1
	First	2	4	2								
	Second	1	1	1								
Unit 2	Ground	0	0	1.5	106.5	99	Not Stated	2.5	22	29	8	1
	First	2	4	2								
	Second	1	1	1								
Unit 3	Ground	0	0	1.5	106.5	99	Not Stated	2.5	35.8	32	8	1
	First	2	4	2								
	Second	1	1	1								
Unit 4	Ground	0	0	1.5	106.5	99	Not Stated	2.5	35.7	27.5	8	1
	First	2	4	2								
	Second	1	1	1								
Unit 5	Ground	0	0	1.5	106.5	99	Not Stated	2.5	21.5	28.3	8	1
	First	2	4	2								
	Second	1	1	1								
Unit 6	Ground	0	0	1.5	106.5	99	Not Stated	2.5	37	26	8	1
	First	2	4	2								
	Second	1	1	1								
Totals		18	30	27	639.0	594	0	15	193	193	48	6
Average/Dwelling		3.00	5.00	4.50	106.50	99.00	0.00	2.50	32.17	28.55	8.00	1

Note (*) Open Plan Ground Floor Lounge & Dining areas considered as 1.5hr.

Table 2 Proposed Development parameters as provided by Applicant.

1 Site Location & Character Appraisal:

1.1 The **Local Character** was, prior to the recent **cumulative cluster of re-developments**, predominantly detached and semi-detached 2 storey houses and detached and semi-detached bungalows, with garages and associated medium sized garden space. A very pleasant and sought after suburban residential area. The recent cluster of redevelopments at **32, 37 & 56 Woodmere Avenue** with high density blocks of flats now under construction, is significantly changing the previously pleasant character of the immediate locality and will place additional pressures on the existing available supporting infrastructure.

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



Fig 1 – Site Location & recent Cluster of Re-Developments

- 1.2** Para 4.2.4 of the New London Plan ^[1] defines the “**Incremental intensification**” criteria for existing **Outer London suburban residential areas** which are specified to be within **PTALs 3-6** or within **800m** distance of a **train or tram station** or within **800m** of **town centre boundary** (interpreted as equivalent to a **District Centre** – (NOT a **Local Centre** as defined in the **Croydon Local Plan**).
- 1.3** The Google Earth image (Fig 1 above) illustrates the development site for this proposed development which is in a **PTAL of 1a** and the recent cluster of re-developments which are **all over 800m** radius from any **Train Station** or **Tram Stop** and are greater than **800m** (Line of Sight) from the **Shirley ‘Local’ Centre** (i.e., not a ‘**District**’ Centre) and therefore the locality is **NOT** appropriate for “**Incremental Intensification**” (as defined by the **London Plan (2021) Para 4.2.4**).
- 1.4 Public Transport Accessibility:**
- 1.4.1** **Woodmere Avenue** has an extremely poor **level of Public Transport Accessibility Level (PTAL) at 1a** provided by a single decker **367 Bus Service** between **Bromley** and **West Croydon** via **The Glade** (between the **A232** and the **A222**), a winding diverse route at service intervals averaging **≈20 minutes**. Walking distances to the nearest **367 Bus Stops** in The Glade are **≈322.5m, 7.5minutes average** walking time (Bromley direction) **≈386m, 9min average** walking time (Croydon direction) as measured on Google Earth.

[1] London Plan (2021) Policy H2 Small Sites para 4.2.4 incremental intensification

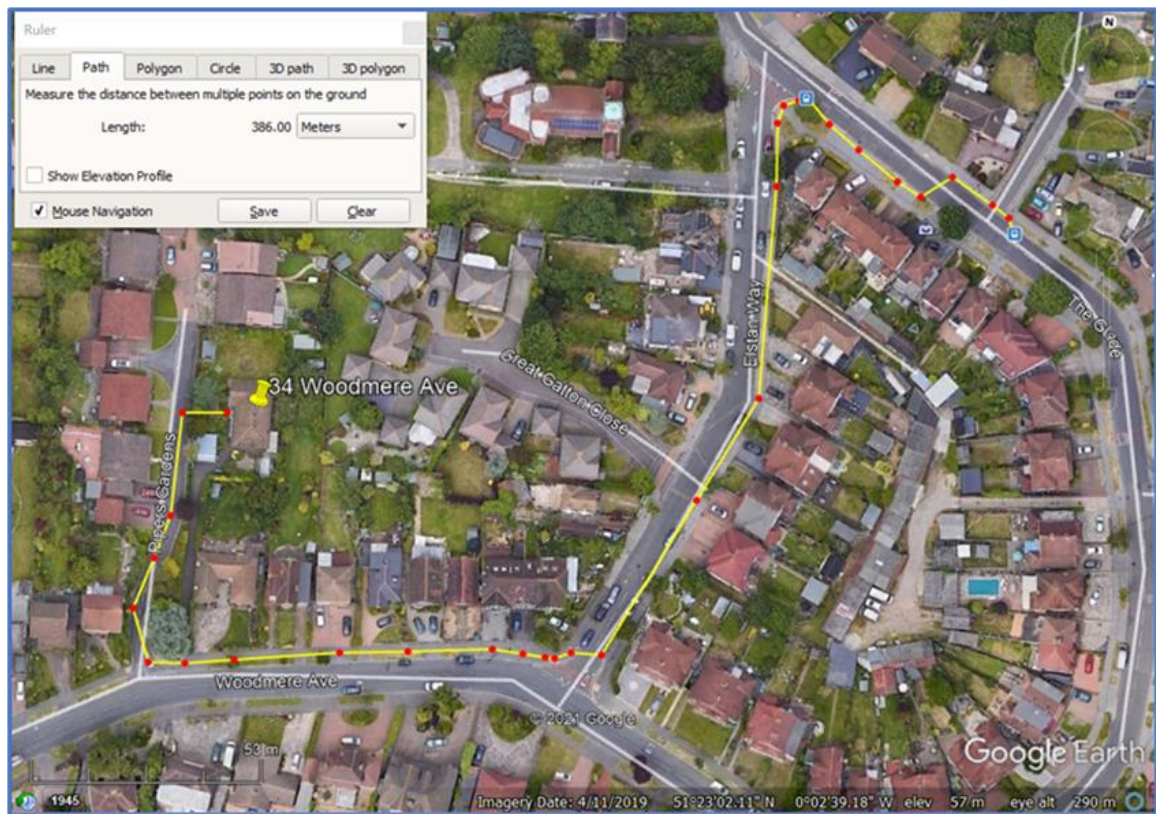


Fig 2 - Walking distance to the nearest 367 Bus Stops

- 1.4.2** The locality of this proposal has poor public service provision and poor level of support services and facilities including GP surgeries (one local GP surgery has recently closed). The local education facilities are provided by Monks Orchard and Orchard Way Primary Schools and Orchard Park High School.

2 Croydon Plan & London Plan ‘Growth’ Policies.

- 2.1** **Croydon Local Plan Policy Table 6.4 - Accommodating growth** and improving Croydon? **We do NOT agree these Policies “Improve” Croydon – rather the opposite.**

Table 6.4 Accommodating growth and improving Croydon

Method of accommodating growth and improving Croydon	How it works	Applicable policies
Evolution without significant change of area’s character	Each character type has a capacity for growth. Natural evolution is an ongoing process where development occurs in a way that positively responds to the local context and seeks to reinforce and enhance the existing predominant local character. Most development throughout the borough will be of this nature.	DM10.1 – DM10.10
Guided intensification associated with enhancement of area’s local character	Areas where the local character cannot be determined as a result of no one character being dominant, further growth can be accommodated through place specific enhancement policies.	DM34 – DM49
Focussed intensification associated with change of area’s local character	Further growth can be accommodated through more efficient use of infrastructure. Due to the high availability of community and commercial services, intensification will be supported in and around District, Local and potential Neighbourhood Centres which have sufficient capacity for growth.	DM10.11
Redevelopment	In larger areas where growth would result in a change to the local character it must be supported by masterplans or design codes.	DM36.2 DM38.1 DM49.1

Table 3 – Croydon Local Plan Policy for “Growth” at DM10 Table 6.4

- 2.2 The Croydon Local Plan ‘Growth’ Policies in **Table 6.4, DM10.1 to DM10.11 or DM34 to DM49 and DM10 para 6.58 e)**, ‘purports’ to describe regeneration “Growth” by either “Redevelopment” or “Evolution” but gives no definition of the acceptable magnitude of growth in terms of ‘Site Capacity’, ‘local available and future infrastructure’^[2] or ‘Public Transport Accessibility’^[3] and therefore the Policy is ‘unenforceable’ and ‘undeliverable’ as it has no measurable methodology, is imprecise, indeterminate and devoid of any Policy definition other than guidance to “seek to achieve” a minimum height of 3 storeys at specific locations. The Policy Fails to meet the guidance required in NPPF^[4] (2019) Section 3. Plan-making and specifically NPPF para 16 or Para 35, a) Positively prepared, b) Justified, c) Effective & d) Consistent with national policy or the Statutory requirement for ‘Sustainable Developments’^[5]. The Policy provides a vague objective that does not consider the limits or allow a determination reflecting the new London Plan Policy 4.2.4^[6] (i.e., areas ‘inappropriate’ for “Incremental intensification”). How does the LPA meet its legal obligations if it has no defined policies for ‘Sustainable Developments’^[5]?
- 2.3 These ‘cumulative’ minor development proposals are individually assessed without any consideration of the cumulative implications of increased population on the locality or the availability of other services infrastructure required to support the developments. The Growth appraisal is completely subjective to Case Officers’ ‘prejudicial interpretation’.
- 2.4 It should be necessary for the LPA to undertake an ‘infrastructure’ and ‘site capacity’ assessment for ‘minor’ developments to ensure infrastructure sustainability for all developments, including any previous cumulative developments as there has been no improvement in supporting infrastructure in the Shirley North Ward over recent years and there is no prospect of any improvement to local infrastructure capacity forecast over the life of the London Plan (2021) or the life of the next revision of the Croydon Local Plan^[7] (2022).

3 New London Plan (Published 2nd March 2021)

- 3.1 The main objective of the New London Plan Policies D1, D2, D3 & D4 is to Optimise ‘Site Capacity’. The omission of the ‘Density Matrix’ now requires an assessment to establish the methodology to define the appropriate ‘densification’ based on ‘Site Capacity’ for ‘sustainable’ developments^[5]. The new London Plan at Policy D1 - London’s form, character and capacity for growth, requires LPAs to undertake area

[2] <https://drive.google.com/file/d/1v7u6lD7rqzjJDsMwQueuf5-c7x6GpZel/view>

[3] <https://www.croydon.gov.uk/sites/default/files/articles/downloads/Development%20Infrastructure%20Funding%20Study%20%28DIFS%29%202019.pdf>

[4] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/81019/7/NPPF_Feb_2019_revised.pdf

[5] This is a legal requirement of Local Planning Authorities exercising their plan-making functions (section 39(2) of the Planning and Compulsory Purchase Act 2004).

[6] London Plan (2021) Policy H2 Small Sites para 4.2.4 incremental intensification

[7] <https://www.croydon.gov.uk/planning-and-regeneration/planning/get-involved-croydons-planning/croydon-local-plan-review>

assessments to define the characteristics, qualities and value of different places to develop different areas' *'capacity for growth'*. **Policy D2 - Infrastructure requirements for sustainable densities** requires Density of proposals to be linked to the provision of future planned levels of infrastructure rather than existing levels and **Policy D3 - Optimising site capacity through the design-led approach** and **Policy D4 - Delivering good design**, requires definition of area *"Design Codes"* for guidance to implement the Policies. The **New London Plan** requires that *'Gentle Densification'* should be actively encouraged by Boroughs in low-and mid-density locations to achieve a change in densities *in the most appropriate way* - but nowhere in the London Plan or the Croydon Local Plan is there a definition of *'Gentle Densification'* or *"the most appropriate way"* provided to define what this actually means!

3.2 Para 4.2.4 of the **New London Plan** ^[8] defines the *"Incremental intensification"* criteria for existing Outer London Borough suburban residential areas are required to be within PTALs 3-6 or within 800m distance of a train or tram station or within 800m of town centre boundary, equivalent to a District Centre. The location at 34 Woodmere Avenue is PTAL 1a and the development site is beyond the 800m limits of these defined requirements for *"Incremental Intensification"* and as such the locality of this site is therefore *'inappropriate'* for *"Incremental intensification"*.

3.3 It is unlikely that the **Croydon Plan** will include any guidance to define the appropriate *'Design Code'* for this proposed development at this location, prior to its adoption in 2022 unless included in a **Supplementary Planning Guidance (SPG)** intermediate Policy clarification.

3.4 It is noted that the new London Plan **Policy D2 - Infrastructure requirements for sustainable densities**:

Para 3.2.4 States:

3.2.4 Minor developments will typically have **incremental impacts** on local **infrastructure capacity**. The **cumulative** demands on **infrastructure** of **minor developments should be addressed in boroughs' infrastructure delivery plans** or programmes. Therefore, it will **not 'normally'** be necessary for minor developments to undertake infrastructure assessments or for boroughs to refuse permission to these schemes on the grounds of **infrastructure capacity**.

3.5 As **Croydon LPA** does **NOT** include *'Shirley'* in the Borough's *"Infrastructure Delivery Plans"* ^[9], and is not identified in the *'Borough Wide'* lists, it is necessary for **minor development applications** to include an *'infrastructure assessment'* to cater for these **cumulative** proposals, including all recent **cumulative developments** within the locality of the proposed development to assess sustainability ^[10] as the locality does not meet the *"normal"* criteria statement of London Plan Policy para 3.2.4 for infrastructure delivery. [See above].

3.6 The **New London Plan SPG's** Modules A, B & C (consultation completed but not yet adopted) indicates *"Boroughs should prepare 'Design Codes' and broader*

[8] **London Plan (2021) Policy H2 Small Sites para 4.2.4 incremental intensification**

[9] <https://drive.google.com/file/d/1v7u6lD7rqzjJDsMwQueuf5-c7x6GpZel/view>

[10] **This is a legal requirement of Local Planning Authorities exercising their plan-making functions (Section 39(2) of the Planning and Compulsory Purchase Act 2004).**

forms of design governance that clarify the character of a 'place' and the elements that are important for new developments to respect".

4 London Plan Policy D3 - Monitoring density and 'site capacity'.

4.1 **London Plan (2021) Policy D3 Para 3.3.22 states:**

3.3.22 To help assess, monitor and compare development proposals **several measures of density are required to be provided by the applicant.** Density measures related to the residential population will be **relevant for infrastructure provision**, while measures of density related to the built form and massing will inform its integration with the surrounding context. The following measurements of **density** should be provided for all planning applications that include new residential units:

1. number of units per hectare
2. number of habitable rooms per hectare
3. number of bedrooms per hectare
4. number of bedspaces per hectare

4.2 These *"measurements of density"* (London Plan Policy D3 para 3.3.22 items 1 through 4) although required, fail to define any methodology to actually use these parameters to evaluate *'site capacity'* to define the acceptability or otherwise of Housing or Residential Densities. These parameters are not mentioned in the London Plan (SPG's) - Modules A, B or C ^[11] or Policy H2 B. ^[12] Policy D3 does NOT even require applicants to provide the basic *'Site Area'*, a fundamental parameter for evaluating *"Site Capacity"*!

4.3 Thus, without a 'robust' local character assessment and evaluation of infrastructure support parameters, it is not possible to determine the scope of *'Site Growth Capacity'* within which a locality can accommodate *'sustainable development'*. In our view, the New London Plan plus the associated planned SPG's (Modules A, B & C) does NOT provide the appropriate guidance to meet NPPF Para 16 d) or Para 35.

4.4 All the foregoing reasoning confirms this proposal is an over development of the site at this location. It can however be logically assumed that *"Gentle Intensification"* or *"Gradual, Moderate Incremental Intensification"* (all undefined) in an area *"inappropriate"* for *"incremental intensification"* would have an appreciably *'discernible'* reduction in Density than those localities categorised and listed in Croydon Local Plan (2018) Table 6.4 – *"Accommodating Growth"*.

4.5 Recognising the foregoing, and acknowledging that the adopted Croydon Local Plan is *'inadequate'* in specifying meaningful *'growth'* definitions or to implement the New London Plan Policies D1, D2, D3, D4 and H2, Planning Officers must therefore make an assessment, based upon the 'current and future known public transport accessibility with other available services infrastructure', *'local character'* and *'site capacity'* to estimate an appropriate level of Residential and Housing Densities within the available existing parameters, without 'cognitive dissonance', as there is no prospect of local supporting infrastructure improvements in the locality over the lifetime of these Plans.

[11] <https://consult.london.gov.uk/good-quality-homes-for-all-londoners>

[12] <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/london-plan-2021>

5 Recent Cluster of Developments - Population Analysis:

5.1 The following is an analysis of population in the **Shirley North Ward**. The population data is available from the **GLA Data Bank** ^[13], detailing local populations for each Ward, from which I have deducted the calculated local non-developed open space areas, which allows comparison of Population Densities per '**developed**' hectare of the recent development proposals compared to the previous average **Shirley North Ward** population density in **persons per hectare** based on developed areas within the Ward.

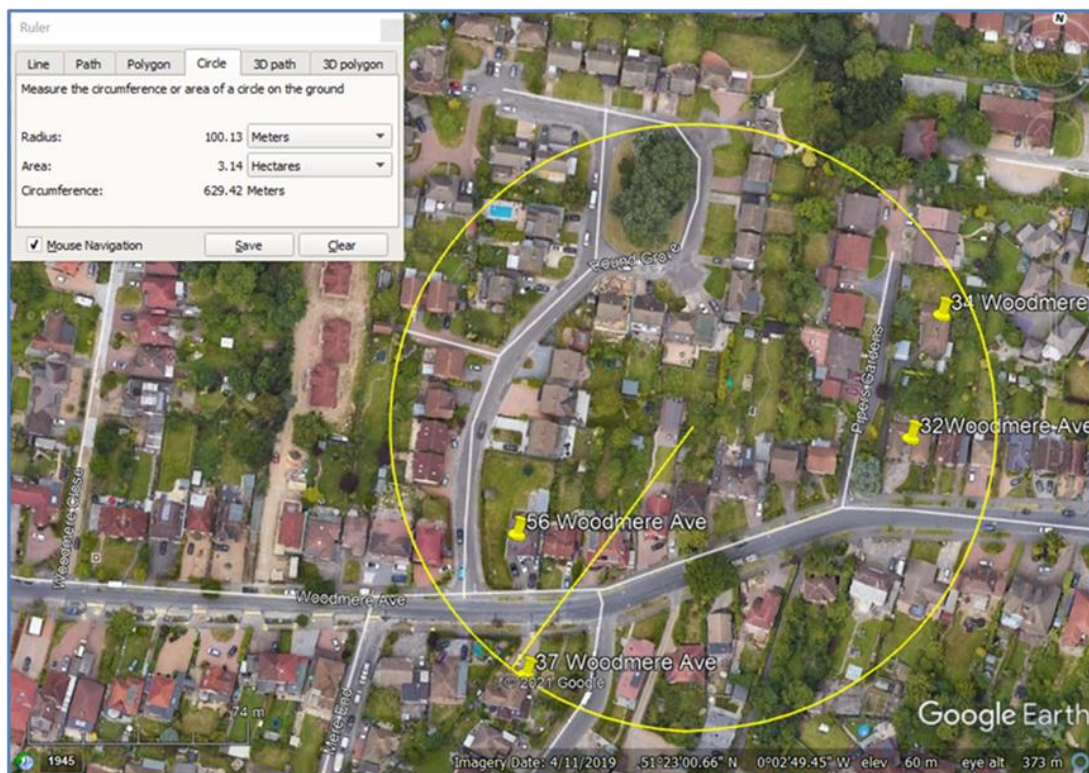


Fig3 - Recent Cluster of redevelopments within 100m radius and 3.14 hectares.

Population Density Analysis - Shirley North Ward			
Population Shirley North Ward [2019]	15058	Undeveloped Open Spaces:	
Area Km ²	3.279	km ²	Ashburton Playing Fields
Area Hectares	327.9	ha	Long Lane Wood
Population Density (per km ²)	4592.25	per km ²	Monks Orchard & Orchard Way Primary School (Playing Fields)
Population Density per ha (2019)	45.9225	per ha	Orchard Park High School (Playing Field)
Annual Population Change (2011-2019) %	0.02	%	Parkfields Rec
Population Shirley North Ward (2021)	15660		Glade Woods, Greenview Green & Kempton Walk
Population Shirley North Ward per Km ² (2021)	4775.94	per km ²	Primrose Lane (Allotments & Gardens)
Population Shirley North Ward per ha (2021)	47.7594	per ha	Shirley Oaks Village Green
Area of Shirley North Ward minus Open Spaces	275.68	ha	Allotments (Tower View, Ash Tree Way)
Average Population Density (Built Area)	56.806	per ha	Total (Undeveloped Open Green Space Area)
			52.22 ha

Table 4 - Shirley North Ward Population Density per hectare based upon GLA data.

5.2 It can be seen therefore that the **population density** for the '**built**' areas of the **Shirley North Ward**, is on average **56.806 persons per hectare** (based on the **GLA** data).

^[13] https://www.citypopulation.de/en/uk/london/wards/croydon/E05011482_shirley_north/

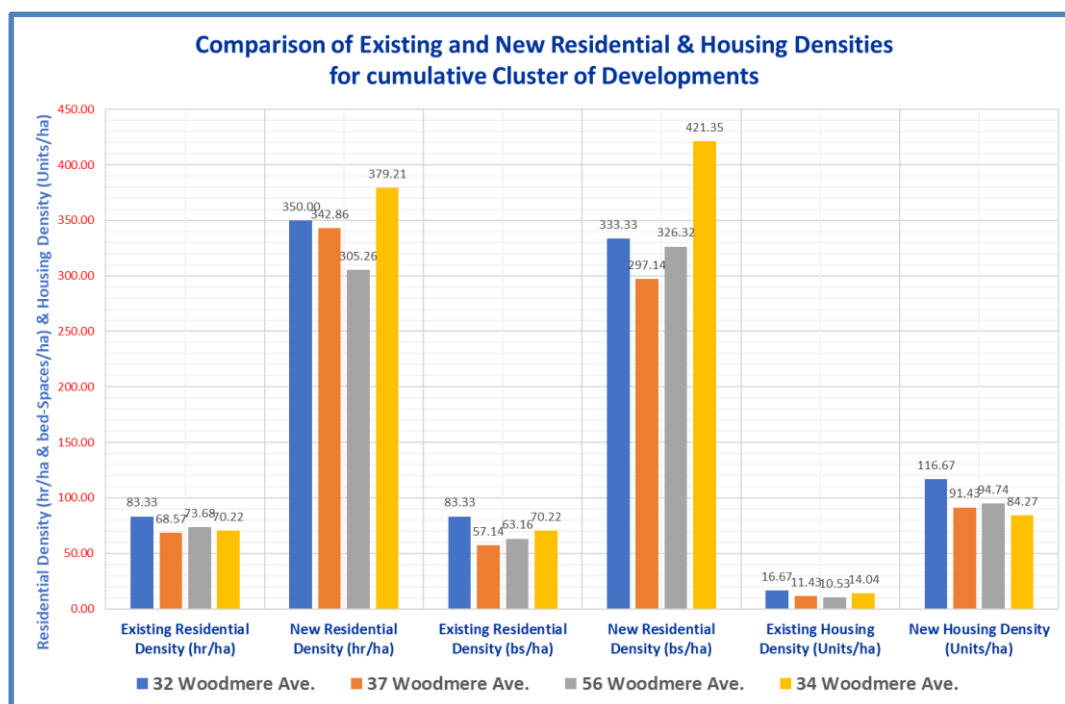
Existing												
Location	Site Area	Dwellings	Bedrooms	Bed-Spaces (bs)	Habitable Rooms	Residential Density (hr/ha)	Residential Density (Bs/ha)	Housing Density (Units/ha)	Population Per Hectare of Existing Dwellings (bs/ha)	Average Population per Developed Hectare for Shirley North Ward (2021)	Difference in population per hectare (from Average)	Percentage Increase in Population per hectare of Existing (%)
32 Woodmere Ave.	0.06	1	3	5	5	83.33	83.33	16.67	83.333	56.806	26.527	46.698
37 Woodmere Ave.	0.0875	1	3	5	6	68.57	57.14	11.43	57.143	56.806	0.337	0.593
56 Woodmere Ave.	0.095	1	4	6	7	73.68	63.16	10.53	63.158	56.806	6.352	11.181
34 Woodmere Ave.	0.0712	1	3	5	5	70.22	70.22	14.04	70.225	56.806	13.419	23.622
Totals	0.2425	4	10	16	18	74.23	65.98	16.49	273.859	56.806	46.634	382.094
Average/Dwelling	0.1112	1.00	3.25	5.25	5.75	73.95	68.46	13.17	68.465	56.806	11.659	20.523

Table 5 Parameters for Existing prior to development proposals at Fig 3

New												
Location	Site Area	Dwellings	Bedrooms	Bed-Spaces (bs)	Habitable Rooms	Residential Density (hr/ha)	Residential Density (Bs/ha)	Housing Density (Units/ha)	Population Per Hectare (Proposals) (bs/ha)	Average Population per Developed Hectare for Shirley North Ward (2021)	Difference in population per hectare (from Average)	Percentage Increase in Population per hectare of Proposal (%)
32 Woodmere Ave.	0.06	7	14	20	21	350.00	333.33	116.67	333.333	56.806	276.527	486.791
37 Woodmere Ave.	0.0875	8	14	26	30	342.86	297.14	91.43	297.143	56.806	240.337	423.082
56 Woodmere Ave.	0.095	9	20	31	29	305.26	326.32	94.74	326.316	56.806	269.510	474.437
34 Woodmere Ave.	0.0712	6	18	30	27	379.21	421.35	84.27	421.348	56.806	364.542	641.730
Totals	0.2425	30	66	107	107	441.24	441.24	123.71	441.237	56.806	1150.916	676.742
Average/Dwelling	0.0784	7.50	16.50	26.75	26.75	344.33	344.54	96.78	341.090	56.806	287.729	500.446

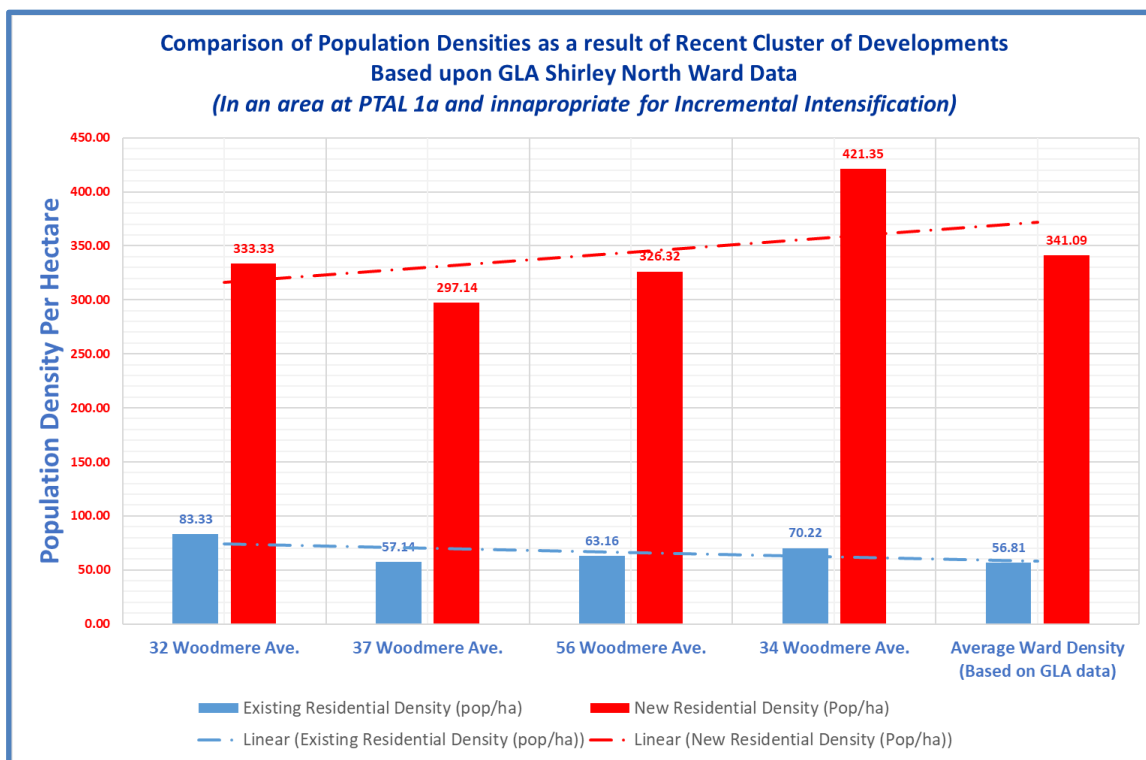
Table 6 Parameters for Cluster of development proposals at Fig 3

- 5.3 The recent **cumulative developments** for this **cluster** of developments, including this current proposal (Fig 3 & Table 6) would result in an average **Residential Population Density** of **341.090 persons per hectare**, an average increase of **500.446%** in density from the **GLA Shirley North Ward Average** of **56.806 persons per hectare** (See Tables 5 & 6 above). **This is NOT realistically an acceptable 'Gentle Densification'!**



Histogram 1 – Comparison of existing and new Residential & Housing Densities for the Cluster of developments given at Fig 3.

- 5.4 The **proposed development** would result in a **population density of 421.348 persons per hectare**, an increase of **641.730% in population per hectare** and an increase of **364.542 persons per hectare** above the average of **56.806 persons per hectare** in **Residential Density** for the **Shirley North Ward** based upon the **GLA Data Set** as modified (to subtract areas of undeveloped open space) (See Tables 4 and 6 above).



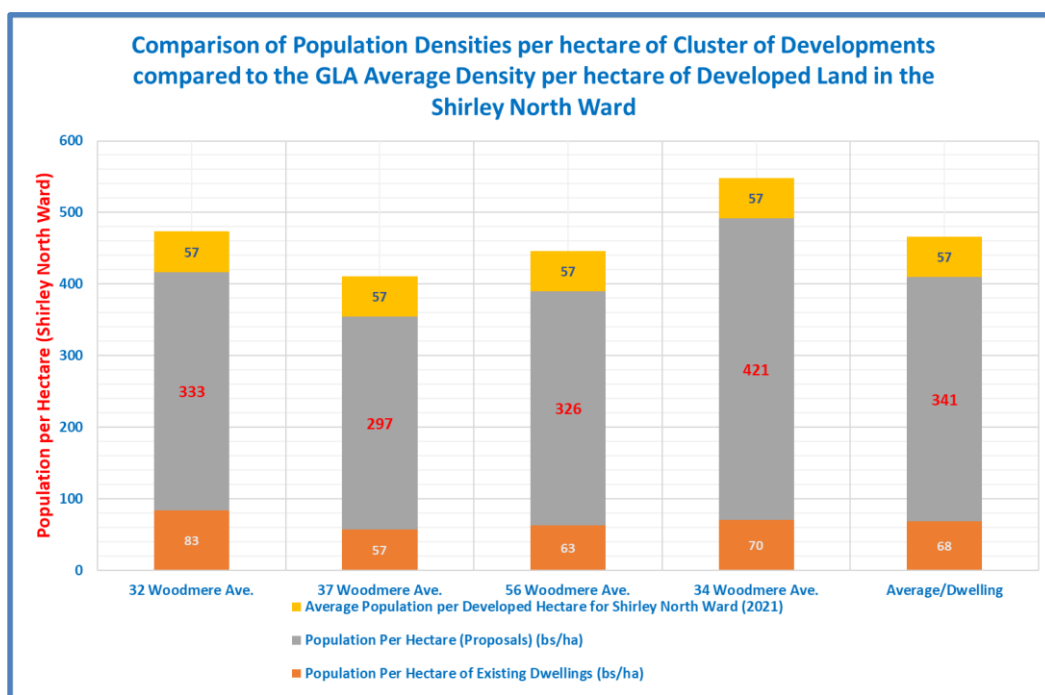
Histogram 2 – Comparison of Population Densities in persons per hectare
of the recent Cluster of Developments given in Fig 3
Based upon the GLA Data for Shirley North Ward.

- 5.5 This is an ‘exceptionally’ large ‘*Incremental Intensification*’ for these re-developments at a location of *PTAL 1a* by anyone’s standards! However, The Policies don’t give us a *clue* as to *what is and what is not acceptable*.
- 5.6 The combined ‘Cluster’ of redevelopments, once completed and occupied, will have increased the local density from the average of **56.806 persons per hectare** (for the Ward) to **341.090 persons per hectare** for this cluster! This is a **500.446% increase** in population density from the current average. As stated earlier this is an *unacceptable exceptionally large ‘Incremental Intensification’* especially in an area that the London Plan Policy defines as “*inappropriate for Incremental Intensification*” (see London Plan Para 4.2.4). ^[14]
- 5.7 All the foregoing reasoning confirms this proposal is an over development of the site at this location with current and future PTAL. It can however be logically assumed that “*Gentle Intensification*” or “*Gradual, Moderate Incremental Intensification*” (all undefined) in an area “*inappropriate*” for “*incremental*”

[14] <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/london-plan-2021>

intensification” would have an appreciably *‘discernible reduction’* in Density than those localities categorised and listed in Croydon Plan Policy Table 6.4 – *“Accommodating Growth”* and *“innappropriate for Incremental Intensification”* (see London Plan Para 4.2.4). ^[15]

- 5.8 In order to meet the LPAs Statutory legal requirement for exercising their plan-making functions (*Planning and Compulsory Purchase Act 2004 - Section 39(2)*), we would expect to see justification of the proposed densities to support *“Sustainable Development”* at this *‘Site Capacity’*. We request that the Case Officer’s Report identifies clear evidence and methodology for the assessment of the proposals *‘Site Capacity’* in terms of Residential and Housing Densities appropriate for the local setting and character at the available PTAL to substantiate the justification of the proposed Densities for this development at this site in relation to the available and future supporting Public Transport Accessibility and other Services Infrastructure. It is unacceptable for Case Officers to presume a *‘prejudicial interpretation’* of *‘adequacy’* without detailed *‘justification’*.



Histogram 3 - Comparison of Population Densities Shirley North Ward

- 5.9 Unless the LPA can specify the appropriate quantifiable limits of *“Incremental Intensification”* or *“Gentle or gradual moderate Densification”* for determination of a proposal, in relation to the available and forecast PTAL, in any location *“inappropriate for incremental Intensification”*, The current London Plan Policies and the Croydon Local Plan Table 6.4 objectives are *completely absurd as Policies and absolutely pointless and irrelevant* for a professional determination of Density.

[15] London Plan (2021) Policy H2 Small Sites para 4.2.4 incremental intensification

6 Croydon Plan Review (2019-2020) - Windfall and Small Sites ^[16]

6.1 (Croydon Local Plan Partial Review 2019) Windfall or 'Small Sites' Evidence Base paper dated November 2019, produced by Croydon Spatial Planning Service and submitted as evidence base for the Local Plan Partial Review – Issues and Options Consultation to provide an evidence base for the potential density changes outlined through 'windfall' or small-scale suburban housing development across the borough over the plan period;

states:

Number of New homes = Participation Rate x Housing Density Uplift (u/ha) x Area (ha)

The equation is used across all typologies, broken down by area within and beyond 800m from train stations, tram stops and district centres, to calculate the number of existing dwellings that would be expected to come forward as windfall sites during the plan period. These base figures for uplift in density calculations are demonstrated in image 8 and resulting participation rates required to meet these figures are demonstrated in images 9 & 10."

There are 8 main residential typologies:

- ☐ Planned Estates of Semi-detached Houses,
- ☐ Detached Housing on Relatively Large Plots,
- ☐ Compact Houses on Relatively Small Plots,
- ☐ Cottages, Terraced Houses and Close-Knit Semi-Detached Houses
- ☐ Low Density Scattered Housing on Large Plots
- ☐ Large Housing on Relatively Small Plots
- ☐ Medium Rise Blocks with Associated Grounds
- ☐ Public Housing with Public Realm.

6.2 These '**Typologies**' are insufficient to define a specific individual Local '**Design Code**' for this application as required of the New London Plan (2021) Policy D3). The **Typologies** list is incomplete and does not fit **all** dwelling types or **all** localities' character or site capacities so cannot define an appropriate '**Design Code**' for each **separate locality**. The '**Typologies**' take NO account of available Local Infrastructure or Public Transport Accessibility as required to evaluate '**Site Capacities**'.

6.3 Uplift Calculations:

6.3.1 The list is **incomplete** and does not fit all dwelling types or all localities' character so cannot define an appropriate '**design code**'. However, we can use this formula to estimate and evaluate the appropriate number of windfall or in-fill dwellings expected for this proposed site area and site capacity as assessed by the Windfall or 'Small Sites' Evidence Base. **The formula takes no account of local Public Transport Accessibility Level (PTAL) or local infrastructure.**

^[16]

<https://www.croydon.gov.uk/sites/default/files/articles/downloads/%27Windfall%27%20or%20Small%20Sites%20Evidence%20Base%20-%20Croydon%20Local%20Plan%20Issues%20and%20Options%202019.pdf>

Location	Uplift in Densities (from existing)			Actual Densities (of proposals)			% Increase (From Existing)		
	Residential Density (hr/ha)	Residential Density (Bs/ha)	Housing Density (Units/ha)	Residential Density (hr/ha)	Residential Density (Bs/ha)	Housing Density (Units/ha)	% Uplift increase in Residential Density (hr/ha)	% Uplift increase in Residential Density (bs/ha)	% Uplift increase in Housing Density (units/ha)
32 Woodmere Ave.	266.67	250.00	100.00	350.00	333.33	116.67	320.00%	300.00%	600.00%
37 Woodmere Ave.	274.29	240.00	80.00	342.86	297.14	91.43	400.00%	420.00%	700.00%
56 Woodmere Ave.	231.58	263.16	84.21	305.26	326.32	94.74	314.29%	416.67%	800.00%
34 Woodmere Ave.	308.99	351.12	70.22	379.21	421.35	84.27	440.00%	500.00%	500.00%
Totals	1081.52	1104.28	334.44	1377.33	1378.14	387.10	1474.29%	1636.67%	2600.00%
Average/Dwelling	270.38	276.07	83.61	344.33	344.54	96.78	368.57%	409.17%	650.00%

Table 7 – Uplift in Densities for the recent Cluster of Developments

Croydon Plan Review Option	Typology	Participation Rate	
		Within 800m	Beyond 800m
Option 1	Bungalows with a medium sized garden	≈2%	≈1%
Option 2 (Preferred)	Bungalows with a medium sized garden	≈1%	≈0.5%

Table 8 Estimated Typologies for 34 Woodmere Ave & Participation Rate

- 6.3.2 Strategic Option 1 Map - Bungalows with a medium sized garden** - within 800m has an estimated Participation Rate of 2% and beyond 800m is 1%. Or Low Density Scattered Housing on medium sized Plots- within 800m has an estimated Participation Rate of 2% and beyond 800m has Participation Rate of 1%.
- 6.3.3 Strategic Option 2 Map - Bungalows with a medium sized garden** - within 800m has an estimated Participation Rate of 1% and beyond 800m is 0.5%. Or Low Density Scattered Housing on medium sized Plots - within 800m has an estimated Participation Rate of 1% and beyond 800m has Participation Rate of 0.5%.
- 6.3.4** It is understood **Option 2** is the preferred **Option for the Plan Review**. Thus, for this proposed development using the above formula:

Estimated Number of expected new homes:

= Participation Rate (0.5%) x Uplift in Housing Density (u/ha) x Area (ha).

= 0.5(%) x (70.22u/ha) x (0.0712ha) = 2.499 units ≈ 2.5 units

Estimated Number of new homes (for this site with this Typology) ≈ **3 units (Integer)**

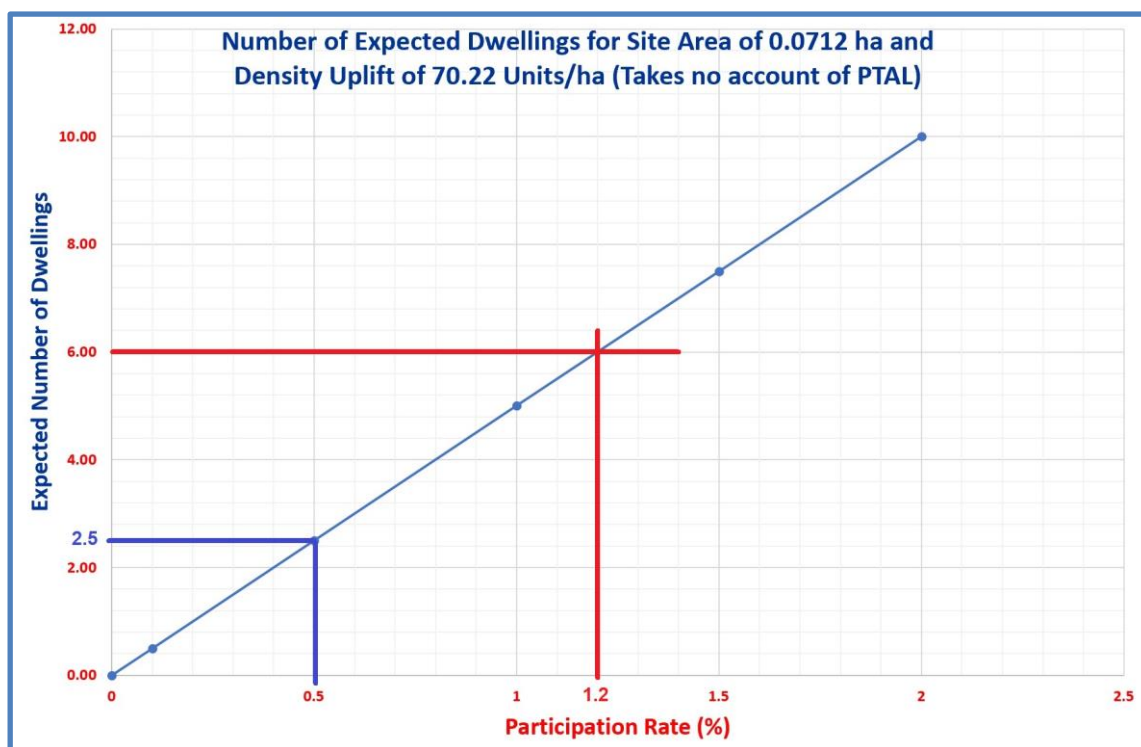
Whereas the proposal is for **6 homes**. (i.e., double the expected).

Participation Rate (PR) = Expected Units/(Uplift x Site Area)

Participation Rate = $\frac{6}{70.22 \times 0.0712} = 1.2$ (%)

(This Formula takes NO account of local PTAL)

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for a better community**



Graph 1 – Illustration of Participation Rate and Expected Number of Dwellings

7 **‘Transport for London’ Connectivity Accessibility Assessment.**

7.1 As the **London Plan Policies D1, D2, D3 and H2** require **LPAs** to undertake Character Assessments and given that the **Character Assessments** of the **current adopted Croydon Plan (2018)** are inadequate (as established in the foregoing statements) and will probably not be completed prior to the adoption of the **Local Plan Review** estimated in **2022**, we have investigated other possible options for **infrastructure assessment** of **‘site capacity’** for comparison.

7.2 **Transport for London (TfL) Connectivity Assessment (Section 2 Para 2.2)** ^[17] recommends suburban Densities at Public Transport Accessibility Levels (PTAL) in the range **0 - 1** to support a **Residential Density** of **150 to 200hr/ha** and **Housing Density** of **35 to 55 units/ha** at an average of **4.5 hr/unit**.

7.3 The **PTAL** at **34 Woodmere Avenue** is **PTAL 1a** and is forecast to remain at **1a** until at least **2031**. The proposal has **Residential Density** of **379.21 hr/ha** and a **Housing Density** of **84.27 Units/ha**.

7.4 In order to analyse the available parameters, it is assumed the **incremental increase** of **Density** and **PTAL** is **‘linear’** across the ranges; then **Density** within each range is given by the straight-line function:

$y = mx + c$ where m = slope (rate of change $\Delta y/\Delta x$), x = PTAL and c = y when $x = 0$ at the y intercept.

[17] <http://content.tfl.gov.uk/connectivity-assessment-guide.pdf>

- 7.4.1 At a **suburban** setting and **PTAL 0 to 1** the **Residential Density** as recommended in the **TfL WebCAT Connectivity Assessment Guide** indicates **Residential Density** should be in the range of **150 to 200 hr/ha**. Therefore:

$$\text{Residential Density} = y = mx + c \text{ where } m = \left(\frac{200-150}{1-0} \right) = 50$$

$$\text{Residential Density} = y = 50x + c \text{ where } x = \text{PTAL}$$

c is found by the known max and min equations:

$$200 = 50 * 1 + c \text{ and } 150 = 50 * 0 + c$$

$$\text{Therefore, } 350 = 50 + 2c : c = \frac{300}{2} : c = 150$$

A Residential Density of 379.21hr/ha then requires a PTAL of:

$$\text{Residential Density } 379.21 = 50x + 150 \text{ therefore } x = \text{PTAL} = 4.58$$

$$\text{Housing Density} = y = mx + c \text{ where } m = \left(\frac{55-35}{1-0} \right) = 20$$

$$\text{Housing Density} = y = 20x + c \text{ where } x = \text{PTAL}$$

c is found by the known max and min equations $55 = 20 * 0 + c$ & $35 = 20 * 1 + c$

$$90 = 20 + 2c \text{ therefore } c = \frac{90-20}{2} = c = 35$$

A Housing Density of 48.27 Units/ha requires a PTAL of:

$$\text{Housing Density} = y = 84.27 = 20x + 35 \text{ therefore } x = \text{PTAL} = 2.46$$

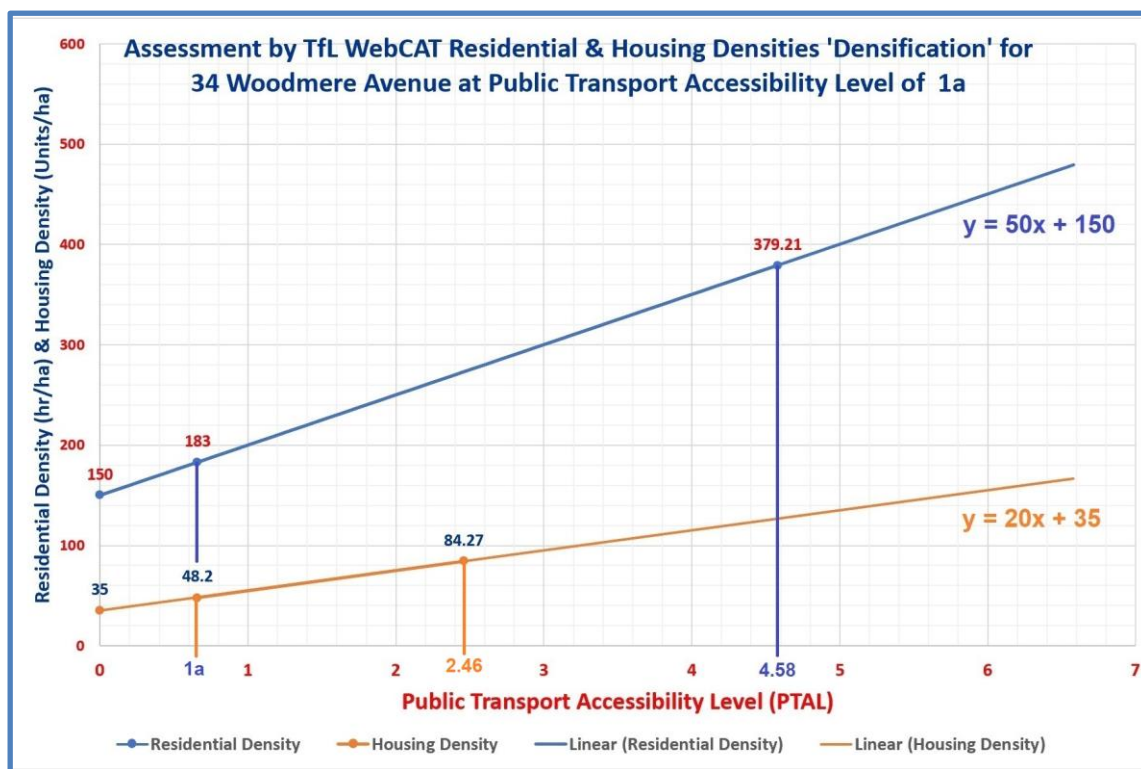
- 7.4.2 Presuming an approximation to linear increases, **PTAL 1a** would be numerically equivalent to **0.66** and **PTAL 1b** numerically equivalent to **1.33**. The appropriate **Residential Density** at **PTAL 1a** is:

$$\text{Residential Density } y = 50 * 0.66 + 150 \text{ then } y = 183 \text{ hr/ha at PTAL 1a}$$

$$\text{Housing Density } y = 20 * 0.66 + 35 \text{ then } y = 48.2 \text{ units/ha at PTAL 1a}$$

- 7.4.3 This analysis using the TfL WebCAT^[18] takes account of locality **Setting (Character)**, **Housing Density** and **Residential Density**, its **Site Area** and the **local Public Transport Accessibility** (i.e., all the appropriate parameters to define '**Site Capacity**') and supports our earlier assessment that this proposal is an over-development for the locality based upon the London Plan definition of areas **inappropriate** for '**incremental intensification**'. The '**Site Capacity**' would require a **PTAL of 4.58** for a Residential Density of **379.21 hr/ha** and **PTAL 2.46** for a Housing Density of **84.27 Units/ha** when the **actual and future PTAL** is in the range **0 to 1 (at 1a)**. This is not realistic with the London Plan policy para 4.2.4 which defines the "**Incremental intensification**" criteria for existing suburban residential areas are required to be within **PTALs 3-6** or within **800m** distance of a train or tram station or within **800m** of town centre boundary (or interpreted as a District Centre) which supports our assessment that the locality of this proposal is inappropriate for "**incremental intensification**" and is an over development for the Site.

[18] <http://content.tfl.gov.uk/connectivity-assessment-guide.pdf>



Graph 2 – Graphical illustration of Density Calculations based on the TfL Connectivity Assessment Guide.

8 London Plan Policy H2 Small sites:

- 8.1 A Boroughs should pro-actively support well-designed new homes on small sites (below 0.26 hectares in size) through both **planning decisions** and **plan-making**.

“4.2.6 The **small sites target** represents a **small amount** of the potential for **intensification** in existing residential areas, particularly in **Outer London**, therefore, they **should be treated as minimums**. To proactively increase housing provision on small sites through **incremental development**, Boroughs are encouraged to prepare **area-wide housing ‘design codes’**, in particular, for the following forms of development: residential conversions, **redevelopment**, extensions of houses and/or ancillary residential buildings.”

- 8.2 **NO IT DOES NOT represent a small amount of the potential for intensification in existing residential areas, particularly in our Shirley North Ward!** In our **MORA** area, **Small Site development** represents a **significant ‘intensification’** (see Histogram 4 below) ^[19] based upon **TfL WebCAT analysis**. There is no quantifiable definition of **“gentle Densification”** or **“Gradual, Moderate Incremental Densification”**. Thus, all these Policies are **very subjective, vague and inadequately defined** for any **professional** assessment. The assessment is at the **subjective prejudicial whim** of **Case Officers**.

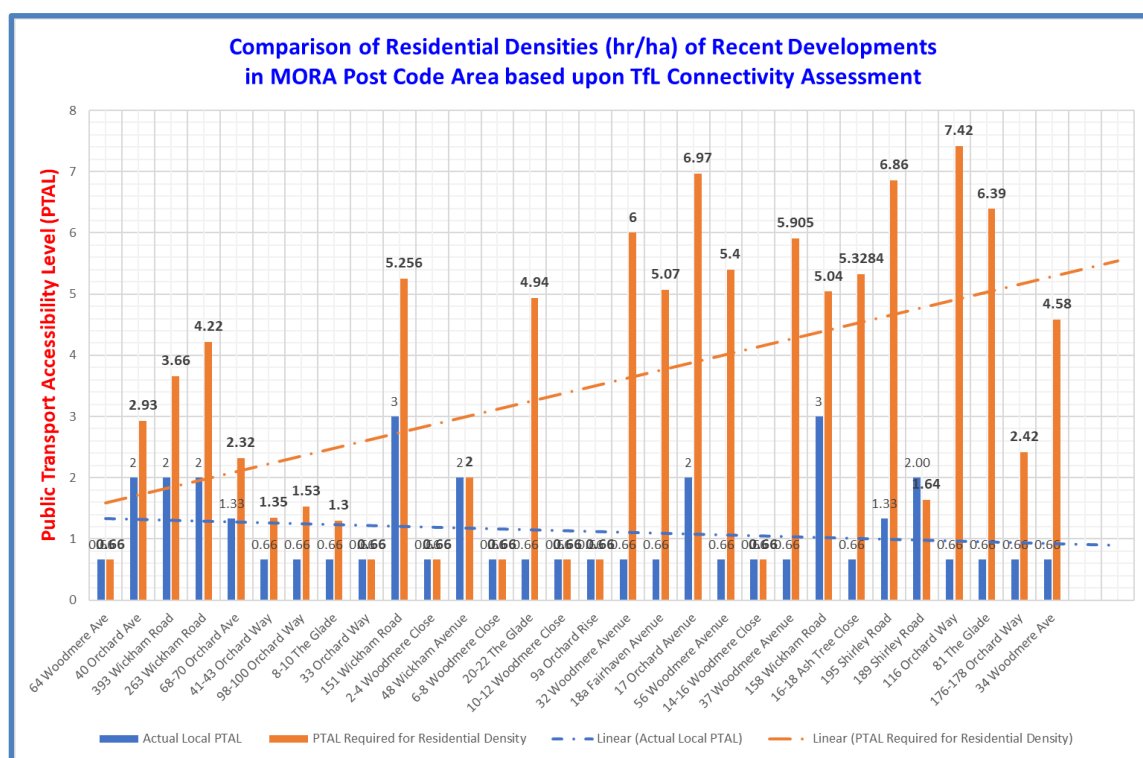
[19] <http://www.mo-ra.co/planning/planning-matrix/>

- 8.3 It can however be **logically** assumed that **“Gentle Densification”** or **“Gradual, Moderate Incremental Densification” (Undefined)** would have an appreciably **‘discernible’** reduction of **Density** than those categories listed in Croydon Local Plan Table 6.4 - Accommodating Growth.

9 Year-on-year cumulative windfall redevelopments

- 9.1 **Year-on-year** cumulative windfall and redevelopments in the **Shirley North Ward** has **unsustainable supporting infrastructure** and access to public transport required for social cohesion from the new occupants of recent developments (see **Histogram 4** below) as there is no mechanism to manage the requirements of additional occupants of multiple **cumulative high-density year-on-year developments** as they are all **assessed individually**.

- 9.2 The **MORA Post Code Area** has seen significant **‘cumulative developments’** since **2016** representing a **significant increased intensification** (see **Histogram 4** below) ^[20] with absolutely no improvement in **Public Transport Accessibility** as based upon **TfL WebCAT analysis** or any improvement to other supporting services infrastructure.



Histogram 4 - Recent Year-on-Year Cumulative Windfall Redevelopments.

- 9.3 The recent **cumulative** developments in the **MORA post code area** (See **Histogram 4** above) including this proposed development application have and will all have **contributed** to the **‘Community Infrastructure Levy’** none of which has so far been visibly spent in the **MORA area** to improve the **Public Transport Accessibility** to support these increases in local **Residential Densities**.

[20] <http://www.mo-ra.co/planning/planning-matrix/>

10 London Plan Policy D6 Housing quality and standards

- 10.1 The proposal meets most accommodation standards as defined by the **New London Plan (2021)** except that the proposal does **NOT** appear to provide any detail of **'In-Built Storage capacities'** that are appropriate for the storage of the normal living clutter requirements for future occupants as defined in the **New London Plan (2021) Table 3.1**. These are **'Minimum' Accommodation Space Standards** which, in addition, the **London Plan** recommends that **"these minimum standards should be exceeded if at all possible"**. It is unacceptable that this requirement or detail is **NOT** submitted in the application documentation.

11 Residential Parking, Curtilage, Refuse Bins & Cycle Storage.

- 11.1 The proposed development Parking Bays are configured North/South on the forecourts of all units and if vehicles are parked in a forward direction will be required to exit in a reverse gear with minimal visibility of any pedestrian or road traffic in the path of the reversing vehicle.
- 11.2 The Front curtilage Boundary between **Units 1 & 2** and **Units 4 & 5** are configured slightly to encroach in what would normally be considered within the front curtilage of **Units 1** (for **unit 2**) and **Unit 4** (for **Unit 5**). It is appreciated that this arrangement is necessary to provide adequate **Refuse Bin Storage** and **Parking Provision** areas for **Unit 2** and **Unit 5** within the forecourts, but it provides **further evidence that the site is over developed** as the Boundary curtilages would normally follow the building line unit separation boundary projected into the front forecourt as is shown with the rear garden unit separation boundaries.
- 11.3 There is **NO** provision for **Disabled Parking Bays** or storage for **Mobility Scooters** or provision of **electric Charging Facilities** shown on the plans or mentioned in the Design and Access Statement.
- 11.4 The proposed development has frontage on to Piper's Gardens which is a **≈4.5m** width **Unclassified Adopted Cul-de-sac**.

12 Housing Targets

- 12.1 One of the reasons for Case Officers approving **'suspect'** development proposals is the stated **"compelling need for more homes"** for which The London Plan and the Croydon Plan and the Croydon Local Plan Review have published **'housing targets'** for the Places of Croydon to meet this **"need"**.
- 12.2 The London plan's proposed 10-year windfall and redevelopment targets for Croydon are given in Policy H2 Small sites at Table 4.2 - 10-year targets (2019/20 - 2028/29) for Net housing completions on small sites (below 0.26 hectares) in size and for Croydon is stated to be **6,410 units** – which equates to **641 dwellings per year** for the **'whole of Croydon' over the Planned period 2019/20 to 2028/29**.
- 12.3 **Croydon Plan Review (2019):**
- 12.3.1 The Targets for new dwellings over the period **2019 to 2039** are set out in **The Strategic Forecast** for the **Croydon Local Plan Review (2019-2039)** which gives the target for the **whole** of the **'Shirley Place'** at between **360 to 460 units** spread over the **20 years of the plan**, giving yearly targets of **18 to 23 units year-on-year**.

12.3.2 This is an **average of 20.6 dwellings per year** for the life of the plan and can be seen in the **LPA's** published (2019) **Croydon Local Plan Review – Issues and Options**, “where it clearly states, “**Homes by Place (2019-2039)**”; including the ‘**Shirley Place**’ (which includes both the **Shirley North and Shirley South Wards**). i.e., **targets Broken down by “Place”** not by **Ward**.

12.3.3 The **MORA Post Code** area application approvals for **2019** as shown in the tables below have provided an additional **48 dwellings** which is **over double** the yearly quota for the **whole** of the ‘**Shirley Place**’ at an **average of 20.6 dwellings per year**. For **2020** it is **24 dwellings** and so far for **2021** it is **19 dwellings**, including this application.

Croydon Plan Review 2019 - 2039 (at 2019)	
Homes by Pace (2019 2039)	
Place	Total
Addington	280 to 350
Addiscombe	1,480 to 1,880
Broad Green & Selhurst	880 to 1,070
Coulsdon	2,050 to 2,490
Central Croydon	11,540 to 12,980
Crystal Palace & Upper Norwood	480 to 670
Kenley and Old Coulsdon	2,000 to 2,480
Norbury	540 to 670
Purley	7,260 to 9,390
Purley Way transformation area	2,900 to 4,470
Sanderstead	1,670 to 2,070
Selsdon	870 to 1,070
Shirley	360 to 460
South Croydon	890 to 1,070
South Norwood & Woodside	560 to 620
Thornton Heath	1,450 to 1,880
Waddon	500 to 610
Already under construction	5,370
Borough totals	At least 46,040 new homes across the borough

12.3.4 The **Monks Orchard Residents' Association (MORA)** monitors only our **MORA Post Code Area** for planning applications which is **only a part of the Shirley North Ward**,^[21] (after the Ward boundary changes) so the **MORA** area is only an **exceedingly small portion** of the ‘**Shirley Place**’ as defined by the **Croydon Local Plan** yet has contributed over **double the target** for **the whole of the Shirley “Place”**.

12.3.5 The **cumulative** average estimated over the two years is $(48 + 21 + 22)/2.42 =$ **37.6 per year** (up to May 2021) which is for just the **MORA post code area**, an **82.82% increase** above the target for the **Shirley Place**.

12.3.6 This clearly shows cumulative dwellings **significantly** exceed the **strategic target** defined in the **Local Plan Review** of **20.6 dwellings average per year**.

12.3.7 The **MORA Post Code Area** applications approvals and waiting approval for 2019 to 2021 dwellings are as shown in the Tables 9. 10 & 11 below.

10.3.8 The **2021** number of planned dwellings in the **MORA Post Code Area** has already exceeded the **Target** for the **Shirley Place**!

10.3.9 The recent cumulative developments in the **MORA post code area** (See also histogram above) have all contributed to the ‘**Community Infrastructure Levy**’ none of which has been visibly spent in the **MORA area** to improve the **Public Transport Accessibility** to support these increases in local Residential Densities.

[21] <http://www.mo-ra.co/about/area/>

Location	Reference No.	Approval Date	Existing Dwellings	New Dwellings	Overall Increase
20-22 The Glade	18/05928/FUL	01/02/19	0	2	2
10-12 Woodmere Close	19/00051/FUL	27/02/19	0	1	1
9a Orchard Rise	18/06070/FUL	21/03/19	1	9	8
32 Woodmere Avenue	19/00783/FUL	20/06/19	1	7	6
18a Fairhaven Avenue	19/01761/FUL	20/06/19	1	9	8
17 Orchard Avenue	19/00131/FUL	06/11/19	1	8	7
56 Woodmere Avenue	19/01352/FUL	24/10/19	1	9	8
14-16 Woodmere Close	19/01484/FUL	23/10/19	0	1	1
37 Woodmere Avenue	19/03064/FUL	26/09/19	1	8	7
Totals			6	54	48

Location	Reference No.	Approval Date	Existing Dwellings	New Dwellings	Overall Increase
151 Wickham Road	19/04149/FUL	18/03/20	0	5	5
16-18 Ash Tree Close	19/04705/FUL	27/02/20	2	8	6
174 The Glade	20/01968/FUL	27/07/20	1	2	1
11 Orchard Avenue	20/01578/FUL	03/09/20	1	2	1
195 Shirley Road	19/06037/FUL	22/09/20	1	9	8
			5	26	21

Location	Reference No.	Approval Date	Existing Dwellings	New Dwellings	Overall Increase
116 Orchard Way	20/05960/FUL	12/05/21	1	4	3
81 The Glade	21/00108/FUL	Waiting	1	9	8
176-178 Orchard Way	21/01636/FUL	Waiting	2	8	6
34 Woodmere Avenue	21/02212/FUL	Waiting	1	6	5
			5	27	22

Tables 9, 10 & 11 Listing Recent Developments in the MORA Post Code Area.

12.3.10 Thus, any statements by the case officer inferring “*an acute need for new homes*” would be considered extremely ‘*suspect*’, giving inaccurate and inappropriate, guidance to the planning committee members for their determination of the proposal – as the pressure to meet housing ‘*need*’ in the MORA area has been *categorically satisfied by over-provision of the strategic targets*. Why have these targets if they are *meaningless*?

13 Summary:

13.1 We have assessed this proposal using as much evidence as available which is appropriate for evaluation. The Croydon Local Plan Review is not produced concurrently with the new revisions of the London Plan Policies and therefore the adopted Croydon Plan does NOT include the requirements to implement the New London Plan ‘*Design-Led-Approach*’ Policies.

13.2 It would appear that the Croydon Local Plan policies on ‘*Growth*’ are prepared with the intention of obfuscation of interpretation and analysis in order to give case officers full flexibility to interpret the policies to their ‘*subjective preference*’ without any possibility or likelihood of a legal or otherwise challenge as the *designations at Table 6.4 are completely subjective to ‘prejudicial interpretation’*.

- 13.3 We would therefore contend that *both* the London Plan and Croydon Plan Policies on ‘*Growth*’ do NOT meet the fundamental requirements of the NPPF (2019) Chapter 3 Plan Making – Para 16:

16.Plans should:

- a) be prepared with the objective of contributing to the achievement of **sustainable development** ^[22];
- 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 organisations, 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;
- e) be accessible through the use of **digital tools** to assist **public involvement** and policy presentation; and
- f) **serve a clear purpose**, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)

- 13.4 The **Croydon Local Plan** does NOT contain any requirements or definitions of ‘**Sustainability**’ with regard to **supporting infrastructure** or **Public Transport Accessibility** with respect to “*Growth*” and as such does Not meet its statutory requirement of **Section 39 (2) of the Planning and Compulsory Purchase Act 2004** ^[22].
- 13.5 The most **contentious** issue raised by local residents is ‘**over-development**’ of a site. The current adopted **Croydon Plan** does NOT provide any **methodology** to determine **individual locality** “*Site Capacities*”, “*Character Assessments*” or “*Design Codes*” of **sufficient detail** (for localities within the **Places of Croydon**), to assess an applications Local ‘**Site Capacity**’ in accordance with the new London Plan (2021) Policy D3.
- 13.6 The objective of the New London Plan is to provide housing to the highest quality whilst “*optimising site capacity*” to meet the ambitious targets and address housing ‘*need*’ while maintaining good external and internal design, *which is quite different from optimising a single dwelling site capacity to provide as many units as possible (6 in this case), that can be squeezed onto a site to maximise profit at the expense of supporting a ‘sustainable site capacity’* ^[22].
- 13.7 We therefore request that the Case Officer’s Report identifies evidence and methodology for the assessment of the recommendation of the proposals ‘**Site Capacity**’ in terms of sustainable Residential and Housing Densities and available PTAL to substantiate the justification of the proposed Densities for this development at this site in relation to the available and future supporting Public Transport accessibility and other services infrastructure. It is unacceptable for Case Officers to presume a ‘*prejudicial interpretation*’ of adequacy without detailed ‘*justification*’.

[22] This is a legal requirement of local planning authorities exercising their plan-making functions (section 39(2) of the Planning and Compulsory Purchase Act 2004).

- 13.8 This proposal, and the cumulative Cluster of Developments shown above, should be evaluated and considered as a whole as the combined increase in population has implications on the supporting infrastructure **sustainability**, which is a legal requirement of local planning authorities, serving all the new developments and for the existing residents. This additional proposal would result in a local **Population Density** of **421.35** residents per hectare, which is a **364.542%** increase for the Shirley North Ward, from the 2021 Average Density of **56.806 Residents per hectare** for the Shirley North Ward Based upon GLA Data and for the **The London Plan Policy H2 Small Site para 4.2.4 limitations** of ‘innappropriate’ **“Incremental Intensification”**.
- 13.9 This proposal is NOT an appropriate acceptable value for **“gentle Densification”** or **“Gradual, Moderate Incremental Densification”** as assessed according to the London Plan definition for **“Incremental intensification”** over and above that of the existing locality for a suburban area of PTAL 1a (Less than 3 to 6) and at greater than 800m from a train/tram station and greater than 800m from a District Centre?
- 13.10 The recent cumulative cluster of developments in the vicinity of **34 Woodmere Avenue**, and including this proposal, all within ≈100m radius and within an area of ≈3.14ha, and all at a PTAL of 1a has and will completely changed the Character of this locality from single dwelling households with associated gardens to blocks of multiple dwelling flats and terraced houses in an area NOT subject to **“incremental Intensification”** as defined by the London Plan Policy para 4.2.4 which states:
- London Plan (2021) Policy H2 – Small Sites; Para Para 4.2.4:**

“Incremental intensification of existing residential areas within PTALs 3-6 or within 800m distance of a station ^[23] or town centre boundary ^[24] is expected to play an important role in contributing towards the housing targets for small sites set out in Table 4.2.”
- 13.11 It is overwhelmingly apparent therefore, that this proposal is an overdevelopment for this locality on the many methods of evaluation referenced in our submission, bearing in mind that recent cumulative developments have already placed significant strain on the available supporting infrastructure such that there is now inadequate infrastructure to support this and the previous developments when completed and fully occupied, it is recognised that there is no planned improvement in Public Transport Accessibility in the foreseeable future for the Shirley North Ward.
- 13.12 There is also lack of stated **‘minimum’** ^[25] required built-storage capacity for future occupants which, by its omission is further proof of over development. The applicant would have difficulty squeezing all these requirements into the Site Area and **straightening the curtilage boundaries**, meet all the minimum space standards and design requirements within the site constraints. Although the rear gardens meet the required amenity space standards, they are extremely small compared to the local character of rear gardens generally across the Ward.

[23] Tube, Rail, DRL or Tram Station.

[24] District, Major, Metropolitan and International Town Centres.

[25] The least or smallest amount or quantity possible, attainable, or required.

- 13.13 The Planning Committee emphasise the **“compelling need for more homes”** for which appropriate targets have been identified. However, the pressure to meet housing **‘need’** in the MORA area has been categorically satisfied by over-provision of the established strategic targets for the **Shirley Place**. It would therefore be inappropriate to quote this **‘need’** as a significant reason to approve this application as the identified **‘need’** has been more than met within the Shirley North Ward to meet the whole **Shirley Place Targets**. Or alternatively, explain why the Shirley North Ward should exceed the strategic quota. ^[26]
- 13.14 This submission, provides ample evidence to refuse this proposed development on grounds of non-compliance to planning policies or not meeting the spirit of the planning policies and therefore is totally inappropriate proposal for the locality.
- 13.15 If this proposal is approved, it will make a complete **“mockery”** of all Planning Policies referenced and quoted in this submission. We have clearly established that both the New London Plan and the current Croydon Local Plan is **‘devoid’** of any defined policies to determine either acceptable or unacceptable growth of any proposals with regard to the **‘Site Capacity’** and the available infrastructure for **sustainable Densities** ^[27] which means the Policies are **‘unenforceable’** and **‘undeliverable’**.

Kind regards

Derek



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Cc:

Sarah Jones MP	Croydon Central
Nicola Townsend	Head of Development Management
Cllr. Sue Bennett	Shirley North Ward
Cllr. Gareth Streeter	Shirley North Ward
Cllr. Richard Chatterjee	Shirley North Ward

Bcc:

MORA Exec. Committee, Local Affected Residents & Interested Parties.

^[26]

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

See: NPPF Paras 60 & 61.

^[27]

This is a legal requirement of Local Planning Authorities exercising their plan-making functions (section 39(2) of the Planning and Compulsory Purchase Act 2004).

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