



# MORA

MONKS ORCHARD RESIDENTS' ASSOCIATION



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To:  
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**From:**  
**Monks Orchard Residents'**  
**Association Planning**

4th July 2021  
Emails: [planning@mo-ra.co](mailto:planning@mo-ra.co)  
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<b>Reference:</b>	<b>21/02831/FUL</b>
<b>Application Received:</b>	<b>Wed 26 May 2021</b>
<b>Application Validated:</b>	<b>Thu 27 May 2021</b>
<b>Address:</b>	<b>187 Shirley Road Croydon CR0 8SA</b>
<b>Proposal:</b>	<b>Alterations, conversion of single-dwelling to form 1x 3b flat, 1x 2b flat and 3x 1b flat, conversion of existing garage, erection of single-storey rear extension, erection of hip to gable and rear dormer extension, installation of 2 rooflights in front roof-slope and provision of associated cycle and refuse storage.</b>
<b>Status:</b>	<b>Awaiting decision</b>
<b>Case Officer:</b>	<b>Grace Hewett</b>
<b>Consultation close:</b>	<b>Sun 04 Jul 2021</b>
<b>Determination date:</b>	<b>Thu 22 Jul 2021</b>

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Dear Ms Hewett

We are a local Residents' Association, registered with the Croydon Local Planning Authority (LPA), representing approximately 3,800 households in the Shirley North Ward, in the London Borough of Croydon. We understand the need for additional housing but take the view that new housing developments and Residential Extensions & Alterations **must** be **sustainable**<sup>[1]</sup> and meet the current and emerging planning policies to ensure future occupants have acceptable living standards and acceptable accessibility to present and proposed public Transport Infrastructure. We only object when proposals do not comply with current adopted or emerging planning policies which are designed to minimise overdevelopment and retain the local character within acceptable constraints.

The type face with coloured background is **current adopted** Planning Policies.

## **1** Locality

- 1.1 The locality of this proposed conversion from a Single-Family Dwelling to an HMO of 5 self-contained Flats is within a TfL assessed **PTAL** of **2** and is **NOT** within **800m** of a Train/Tram Station or **800m** of a District Centre. Shirley is a **Local Centre** as defined by **Croydon Local Plan Para 11.213**.

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[1] <https://www.legislation.gov.uk/ukpga/2004/5/section/39>



## 1.2 Shirley Local Centre

**Croydon Local Plan Para 1.213** states:

*"Shirley Local Centre consists of the combination of three different character types an 'Urban Shopping Area', 'Scattered Houses on Large Plots' and a 'Suburban Shopping Area'. The northern side of the Local Centre is more tightly built-up, while the southern more is spacious with green verges, tree lined streets and parking within slip roads. In this area the potential for growth is limited."*

## 1.3 Existing:

187 Shirley Road							
Existing Semi-Detached		Site Area	100	sq.m.			
PTAL 2011	2	Site Area	0.01	ha			
PTAL 2031	2						
Units	Floor	Bedrooms	Bed Spaces (Estimated)	Habitable Rooms			
1	Ground	0	0	4	Residential Density	900.00	hr/ha
	First	5	7	5	Residential Density	700.00	bedspaces/ha
Totals		5	7	9	Housing Density	100.00	units/ha

## 1.4 Parameters for this proposal:

New Application											
Ref: 21/02622/FUL		Site Area	100	sq.m.				Residential Density	1300.00	hr/ha	
PTAL 2011	2	Site Area	0.01	ha				Residential Density	1100.00	bedspaces/ha	
PTAL 2031	2	Units	5				Housing Density	500.00	units/ha		
	Floor	Bedrooms	Bed Spaces	Habitable Rooms	GIA (offered)	Minimum GIA (Required)	Minimum GIA with allowance to compensate for lack of Open Space	Built-In Storage (Offered)	Minimum Built-In Storage (Required)	Open Space Amenity (Offered)	Minimum Open Space Amenity (Required)
Flat 1	Ground	2	4	3	77.2	70	70	Not Stated	2	>100m <sup>2</sup>	7
Flat 2	Ground	3	4	4	80	74	74	Not Stated	2.5	>100m <sup>2</sup>	7
Flat 3	First	1	1	2	39.8	37	42	Not Stated	1	0	5
Flat 4	First	1	1	2	45.5	37	42	Not Stated	1	0	5
Flat 5	Second	1	1	2	46.6	37	42	Not Stated	1	0	5
Totals		8	11	13	289.1	255	270	-	7.5	-	29

Flats 3, 4 & 5 have Showers instead of baths, allowing reduction of GIA from 39sq.m. to 37sq.m.

## 2 Space Standards

**2.1** The Units are NOT identified on the ground, first or roof floor plans which makes for difficult analysis of accommodation standards for each individual Flat.

**2.2** Flats 3, 4 & 5 have no Open Amenity Space. Flats 4 & 5 have increased GIA to compensate for lack of Private Open Space but **Flat 3** is deficient by **2.2m<sup>2</sup>**. Flats 3, 4 & 5 have shower rooms instead of bathrooms which reduces the minimum required GIA to 37m<sup>2</sup> (not 39m<sup>2</sup> as stated in the Design and Access statement).

**2.3** Dwellings **must** provide at least the gross internal floor area and built-in storage area set out in Table 3.1 and this should be exceeded if possible.

A dwelling with two or more bedspaces must have at least one double (or twin) bedroom that is at least 2.75m wide. Every other additional double (or twin) bedroom must be at least 2.55m wide.

A one bedspace single bedroom must have a floor area of at least 7.5 sq.m. and be at least 2.15m wide.

A two-bedspace double (or twin) bedroom must have a floor area of at least 11.5 sq.m.

**Table 3.1 - Minimum internal space Standards for new dwellings**

Type of Dwelling		Minimum gross internal floor areas and storage (Square Metres)			
Number of Bedrooms	Number of Bed spaces (persons (p))	1 Storey dwellings	2 Storey dwellings	3 Storey dwellings	Built-in storage
1b	1p	39 (37)*	-	-	1
	2p	50	58	-	1.5
2b	3p	61	70	-	2
	4p	70	79	-	2
3b	4p	74	84	90	2.5
	5p	86	93	99	2.5
	6p	95	102	108	2.5

### **London Plan Policy Table 3.1 – Minimum Internal Space Standards**

- 2.4 The proposed floor plans and **Design & Access Statement** does **NOT** indicate the dimensions of any ‘**In-Built**’ Storage to meet the **London Plan Table 3.1** minimum space standards. These **Minimum Standards** are necessary and should be exceeded, if possible, for the benefit of future occupants for the life of the development. Prior to a decision being made, the actual dimensions for any offered ‘**In-Built**’ Storage for each Apartment should be specified and checked against the minimum requirement as listed in the London Plan **Table 3.1**.

## **3 General Comments on Design & Character**

### **3.1 Refuse & Recycling**

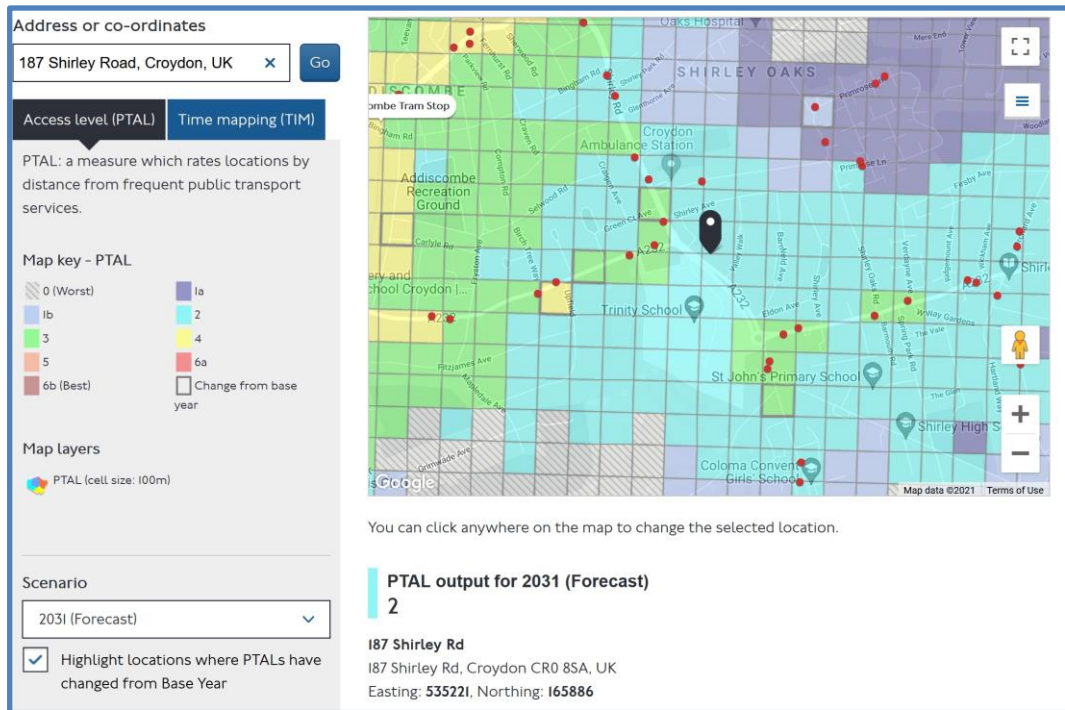
- 3.1.1 **DM13.1** To ensure that the location and design of refuse and recycling facilities are treated as an integral element of the overall design, the Council will require developments to:

- Sensitively integrate refuse and recycling facilities within the building envelope, or, in conversions, where that is not possible, integrate within the landscape covered facilities that are **located behind the building line** where they will not be visually intrusive or compromise the provision of shared amenity space;
- Ensure facilities are visually screened;
- Provide adequate space for the temporary storage of waste (including bulky waste) materials generated by the development; and
- Provide layouts that ensure facilities are safe, conveniently located and easily accessible by occupants, operatives and their vehicles.

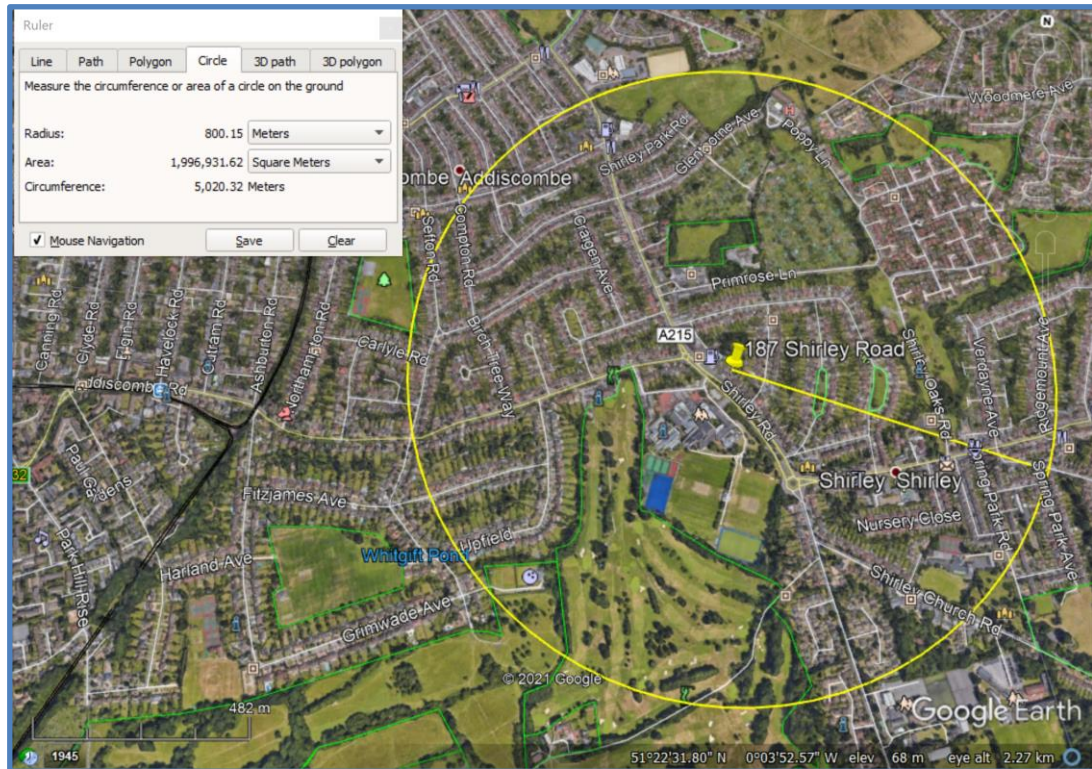
- 3.1.2 The location of the Refuse and Recycling Bins are **NOT** located “**behind the Building Line**” as required by **Policy DM13.1 a)** and therefore is **non-compliant** to **Policy 13.1 a)**.

### **3.2 Public Transport Accessibility:**

- 3.2.1 **187 Shirley Road** has a TfL assessed **Public Transport Accessibility Level** (PTAL) of **2** and forecast to remain at **2** until at least 2031.



## 4 Incremental Intensification



**Google Earth Image showing 187 Shirley Road is over 800m from a Train/Tram Station and over 800m from a District Centre.**

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



**4.1 London Plan (2021) Policy H2 – Small Sites; Para 4.2.4:**

*“Incremental intensification of existing residential areas within PTALs 3-6 or within 800m distance of a station [2] or town centre boundary [3] is expected to play an important role in contributing towards the housing targets for small sites set out in Table 4.2.”*

4.2 The Google Earth image (above) illustrates the development site for this proposed development at **187 Shirley Road** which has **Public Transport Accessibility Level (PTAL) of 2** and is greater than **800m** radius from any **Train Station** or **Tram Stop** and over **800m** (Line of Sight) from any **District Centre** and therefore the locality is **NOT appropriate** for **“Incremental Intensification”** as defined by the **London Plan**. The **Shirley Shopping Parades** are all **‘Local’ Centres**, not **‘District’ Centres**.

4.3 Although the **Croydon Local Plan** and the new **London Plan “Growth” Policies** do NOT define the appropriate magnitude of **‘Incremental Intensification’** or **‘Gentle Intensification’** it can be logically assumed that these **Densities** would be demonstrably significantly less than those designations listed in **Croydon Plan Policy DM10 Table 6.4**.

**5 The Croydon Local Plan & The London Plan ‘Growth’ Policies.**

5.1 The LPA has a **Statutory requirement** to ensure that proposed developments are **Sustainable [4]** – (Section 39(2) of the Planning and Compulsory Purchase Act 2004) and **NPPF Section 2 - Achieving sustainable development**. In order to comply with this **legal requirement**, a criterion or definition of sustainability and the measurable parameters for assessing sustainability within the proposed development **Site Capacity** are necessary for definition of the **sustainability criterion** in the Local Plan but have been **conveniently omitted** by the Spatial Planning authors of the adopted Local Plan.

5.2 **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
<b>Evolution without significant change of area's character</b>	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
<b>Guided intensification associated with enhancement of area's local character</b>	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
<b>Focussed intensification associated with change of area's local character</b>	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
<b>Redevelopment</b>	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] Tube, Rail, DRL or Tram Station.

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

[4] <https://www.legislation.gov.uk/ukpga/2004/5/section/39>



5.3 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’<sup>[5]</sup> or ‘Public Transport Accessibility’<sup>[6]</sup> 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 (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’**.<sup>[4]</sup> The Croydon Plan Policy provides a **vague objective** that does not consider the limits or allow a substantive determination reflecting the new **London Plan Policy 4.2.4**<sup>[7]</sup> (i.e., How areas ‘inappropriate’ for “Incremental intensification”) should be assessed.

5.4 We challenge the case officer to provide justification in the Recommendation Report how this development proposal meets or fails the **statutory requirement of sustainable**<sup>[8]</sup> **development, including** evaluation of ‘**site capacity**’ and other supporting **sustainable infrastructure** and the methodology of assessment. **It is unacceptable that a determination be based upon a Case Officer’s subjective prejudicial assessment without logical Development Management justification of sustainability.**

## 6 New London Plan (Published 2<sup>nd</sup> March 2021)

6.1 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. The new London Plan at **Policy D1 - London’s form, character and capacity for growth**, requires LPAs to undertake area 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** require 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**, require definition of area “Design Codes” for guidance to implement the Policies.

[5] <https://drive.google.com/file/d/1v7u6ID7rqzjJDsMwQueuf5-c7x6GpZel/view>

[6]

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

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

[8] <https://www.legislation.gov.uk/ukpga/2004/5/section/39>



- 6.2 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!**
- 6.3 Para 4.2.4 of the New London Plan <sup>[9]</sup> defines the **"Incremental Intensification"** criteria for existing **Outer London Boroughs'** suburban residential areas as being 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 **187 Shirley Road** is **PTAL 2** 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"**.
- 6.4 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. If a **'Design Code'** is available, we request that it be described and defined in the case Officer's Report.
- 6.5 It is noted that the new London Plan **Policy D2 - Infrastructure requirements for sustainable densities** at 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**."*
- 6.6 As **Croydon LPA** does **NOT** include **'Shirley'** in the Borough's **"Infrastructure Delivery Plans"** <sup>[10]</sup>, or the **'Borough Wide'** lists, the interpretation of **Para 3.2.4** indicates an **'abnormal'** situation whereby it is necessary for **minor development applications** to include an **'infrastructure assessment'** to cater for these **cumulative** proposals **"or for boroughs to refuse permission to these schemes on the grounds of infrastructure capacity"**. This should **include** an assessment of all minor developments within the locality to assess **sustainability** <sup>[11]</sup> **as the locality does not meet the "normal" criteria statement of London Plan Policy para 3.2.4 for infrastructure delivery**.
- 6.7 **London Plan Policy D3**
- 6.7.1 **3.3.22** To help assess, monitor and compare development proposals several measures of density are required to be provided by the applicant. Density

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

[10] <https://drive.google.com/file/d/1v7u6ID7rqzJDsMwQueuf5-c7x6GpZel/view>

[11] <https://www.legislation.gov.uk/ukpga/2004/5/section/39>



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.

6.7.2 These “*measurements of population 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 even mentioned* in the London Plan (SPG’s) - **Modules A, B or C** <sup>[12]</sup> or **Policy H2 B.** <sup>[13]</sup>

6.7.3 **Policy D3** does NOT even require applicants to provide the basic ‘*Site Area*’, a fundamental parameter for evaluating “*Site Capacity*”! Thus, Para 3.3.22 is rather superfluous and irrelevant as it has no meaningful relevance in the methodology of assessment of acceptability or unacceptability of a proposal as defined by **Policy D3 - Monitoring density and ‘site capacity’** or as required by NPPF Paras 16 d) or Para 35.

6.8 The Residential **Population Density** of the Shirley North Ward as defined by the **GLA Data Set**, minus all the **Open undeveloped Space** within the Ward gives a good evaluation of appropriate densities in this locality which is inappropriate for “*Incremental Intensification*” as referenced in the **London Plan Policy D3 paras 3.2.4 and 3.3.22.**

6.9 The New London Plan SPG’s Modules A, B & C (consultation completed but not yet adopted) indicates “*Boroughs should prepare ‘Design Codes’ and broader forms of design governance that clarify the character of a ‘place’ and the elements that are important for new developments to respect*”.

6.10 An occupancy of 11 persons on a site area of 0.01ha gives an increased density of 1,836% above the average Density of 56.8 persons per hectare for the Shirley North Ward at PTAL of 2 and forecast to remain at 2 up to 2031. This is **significantly greater than any interpretation of “Incremental Intensification” or “Gentle Densification” allowed under London Plan Policy para 4.2.4.** **Where on the Graph below is the appropriate “Gentle Densification” or “Incremental Intensification” density point or range for this suburban Site Area of 0.01ha and PTAL at 2?**

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

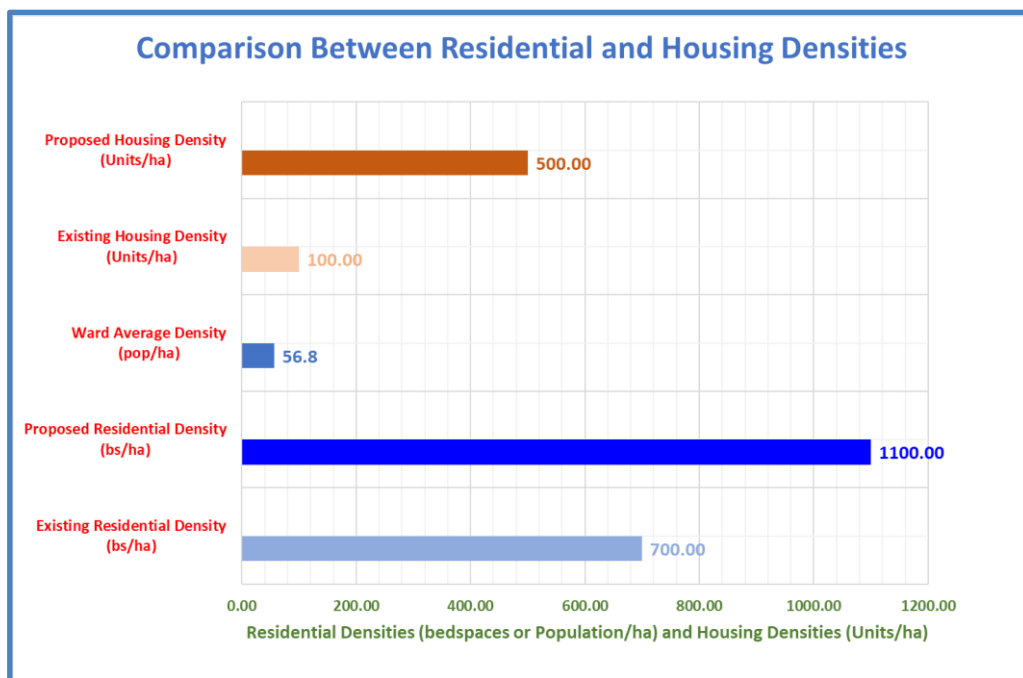
[13] <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/london-plan-2021>





Population Density Analysis - Shirley North Ward (GLA Data)			
Shirley North Ward [2019]	15058		Undeveloped Open Spaces:
Area Km <sup>2</sup>	3.279	km <sup>2</sup>	Ashburton Playing Fields
Area Hectares	327.9	ha	Long Lane Wood
Population Density (per km <sup>2</sup> )	4592.25	per km <sup>2</sup>	Monks Orchard & Orchard Way Primary School (Playing Field)
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 <sup>2</sup>	4775.94	per km <sup>2</sup>	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	275.68	ha	Allotments (Tower View, Ash Tree Way)
Average Population Density (Built Area)	56.8062	per ha	Total (Undeveloped Open Green Space Area)
			52.22 ha

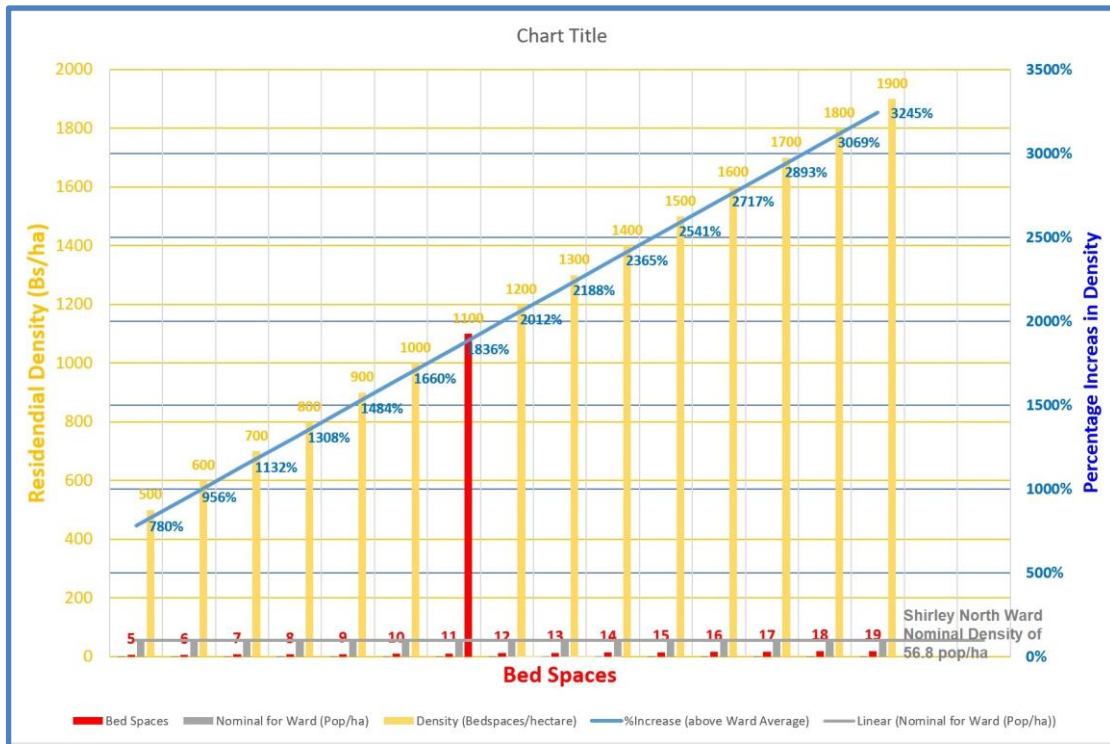
**GLA Average Population Density for Shirley North Ward  
(minus undeveloped Area)**



**Histogram - Showing Comparisons of Residential & Housing Densities with  
the existing and Shirley North Ward Average Population Densities  
(GLA Data minus open space areas)**

**6.11 We therefore challenge the Case Officer to indicate the methodology used to assess and define the ‘*Site Capacity*’ of the proposed development, including the definition and evaluation of all parameters used for this assessment.**

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.

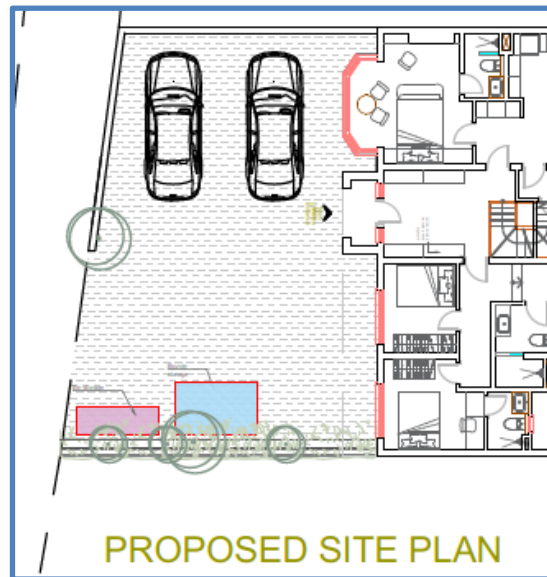


**Incremental increase in Residential Density (bedspaces/ha) of this proposed development with Site Area of 0.01ha (showing actual at occupancy of 11 persons (RED) column)**

## 8 CAR PARKING PROVISION

8.1 Car parking provision consists of two Off-Street parking bays servicing 11 occupants (probably 7 adults). At a PTAL of 2 this is an unacceptable level of off-street parking provision on a Red Route Dual Carriageway.

- Any overspill parking would need to be in Valley Walk which already has parking stress.
- Assuming 7 adult occupants of the proposed development all of whom possibly own a vehicle (car or van) would mean overspill of 5 vehicles onto the local road network for overnight parking at a PTAL 2 location. This is inadequate on-site parking for the number of occupants at PTAL 2;
- Sight lines are not provided;
- There is no legislation to prevent car or van ownership for personal/business purposes.



## 9 Housing Targets

- 9.1 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”.
- 9.2 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 2029/30.
- 9.3 Croydon Plan Review (2019):
- 9.3.1 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 (2019-2039)**, giving yearly targets of **18 to 23 units year-on-year**.
- 9.3.2 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**.
- 9.3.3 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 **21 dwellings** and so far for **2021** it is **25 dwellings**, including this application.
- 9.3.4 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**, (after the Ward boundary changes) so the MORA area, although only an exceedingly small portion of the ‘**Shirley Place**’ as defined by the Croydon Local Plan, has contributed **over double the target** for the whole of the “**Shirley Place**”.
- 9.3.5 The cumulative average estimated over the two and a half years is  $(48 + 21 + 37)/(2+7/12) = 41.03$  per year (up to July 2021) which is for just the MORA post code area, which equates to an **99.17%** increase above the **20.6 Dwellings Strategic target** per year for the Shirley Place as a whole.
- 9.3.6 This clearly shows the cumulative dwellings **significantly** exceed the strategic target defined in the Local Plan Review of **20.6 dwellings average per year**.
- 9.3.7 The MORA Post Code Area applications approvals and waiting approval for 2019 to 2021 dwellings are as shown in the Tables below.

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

9.3.9 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.

9.3.10 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 or Delegate 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?

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

9.3.11 NPPF Para 14 states:

*In situations where the presumption (at paragraph 11d) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided all of the following apply.*

- the neighbourhood plan became part of the development plan two years or less before the date on which the decision is made;
- the neighbourhood plan contains policies and allocations to meet its identified housing requirement;
- the local planning authority has at least a three-year supply of deliverable housing sites (against its five-year housing supply requirement, including the appropriate buffer as set out in paragraph 73); and
- the local planning authority’s housing delivery was at least 45% of that required over the previous three years.

The MORA area has been categorically satisfied by over-provision of the strategic targets. Why have these targets if they are meaningless?





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
<b>Totals</b>			<b>6</b>	<b>54</b>	<b>48</b>

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
			<b>5</b>	<b>26</b>	<b>21</b>

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
21 Woodmere Gardens (Pre App info)		Waiting	1	9	8
75 Shirley Avenue	21/02622/FUL	Waiting	1	4	3
187 Shirley Road	21/02831/FUL	Waiting	1	5	4
			<b>8</b>	<b>45</b>	<b>37</b>

### Recent Developments in the MORA Post Code Area since 2019.

## 10 Summary & Conclusions:

- 10.1 The foregoing reasons provide ample evidence to refuse this development proposal on grounds of character and failure to define Minimum Space Standards.
- 10.2 The proposed development is within an area of **PTAL 2** which is *inappropriate* for *“Incremental intensification”* as it is *NOT* in an existing residential area within **PTALs 3-6** or within **800m** distance of a station <sup>[14]</sup> or town centre boundary <sup>[15]</sup> for *“Incremental Intensification”* as defined in the London Plan (2021) para 4.2.4.

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

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



- 10.3 There is NO definition of magnitude for acceptable **Gentle Intensification** or **Incremental Intensification** and therefore we request that the Case Officer provides justification for the assessment of **“Site Capacity”** to meet the proposed sustainable development for this Site. We therefore challenge the Case Officer to indicate the methodology used to assess and define the **‘Site Capacity’** of the proposed development, including the definition and evaluation of all parameters used for this assessment.
- 10.4 It can however be logically assumed that **“Gentle Intensification”** or **“Gradual, Moderate Incremental Intensification”** (Undefined) would have an appreciably **‘discernible’** reduction of Density than those categories listed in Croydon Local Plan Table 6.4 - Accommodating Growth.
- 10.5 The proposed development does NOT provide evidence to meet the Minimum **In-Built Storage** Space Standards and Flat 3 has inadequate Gross Internal Area (GIA) to compensate for lack of any Open Amenity Space.
- 10.6 The proposal has inadequate parking provision at a locality of PTAL2 for 11 persons probably 7 adults who could own a car or van for business purposes. 5 vehicles may need overnight on-street parking.
- 10.7 The strategic Housing Need for the Shirley “Place” has been exceeded by cumulative developments in the MORA Post Code Area over  $\approx 2.58$  years which is just a small portion of the Shirley North Ward (Not even including Shirley South Ward). Therefore, the housing need for the Shirley Place has been significantly **exceeded** by recent developments and proposals in the MORA Post Code Area alone.

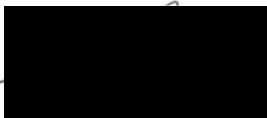
We therefore recommend that this proposed development is refused.

Please list our objection on the on-line public register as Monks Orchard Residents’ Association (objects).

Please inform us of your recommendation in due course.

Kind Regards

Derek Ritson



**Derek C. Ritson** I. Eng. M.I.E.T.  
MORA Executive Committee - Planning  
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**Cc:**

Nicola Townsend	Head of Development Management
Cllr. Sue Bennett	Shirley North Ward Councillor
Cllr. Richard Chatterjee	Shirley North Ward Councillor
Cllr. Gareth Streeter	Shirley North Ward Councillor

**Bcc:**

MORA Executive Committee, Affected Local Residents, Interested Parties

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