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**Monks Orchard
Residents' Association
Planning**

16th August 2021

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Reference:	21/03702/FUL
Application Received	Mon 12 Jul 2021
Application Validated	Wed 28 Jul 2021
Address	21 Woodmere Gardens Croydon CR0 7PL
Proposal:	Demolition of single-family dwelling and garage and the erection of 3 x two storey terraced houses with accommodation in the roof space, with 3 off street car parking spaces and a detached 2-storey building with accommodation in the roof space, comprising of 6 self-contained apartments with intergraded bike and refuse stores and 6 off street car parking spaces.
Status	Awaiting decision
Case Officer:	Christopher Grace
Consultation Date:	Wed 25 Aug 2021
Decision Deadline:	Wed 22 Sep 2021

Dear Mr Grace

Please accept this letter as a formal objection to Application **Ref: 21/03702/FUL** for Demolition of single-family dwelling and garage and the erection of 3 x two storey terraced houses with accommodation in the roof space, with 3 off street car parking spaces and a detached 2-storey building with accommodation in the roof space, comprising of 6 self-contained apartments with intergraded bike and refuse stores and 6 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 understand the **'need'** for additional housing, but new housing developments and Residential Extensions & Alterations **must** be **sustainable**^[1] and meet the current and emerging planning policies to ensure future occupants have acceptable living standards and acceptable accessibility to Public Transport and other public service Infrastructure.

We only object when proposals do not comply with current adopted or emerging planning policies designed to minimise overdevelopment and retain the local character within acceptable constraints or vaguely specified policies which are subject to varying interpretations.

The proposal is for demolition of a **family Bungalow** of an *estimated 5 habitable Rooms* in a Site Area of **1210m² (0.121ha)** with an *estimated Residential Density* of **41.322hr/ha** or

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

33.058bs/ha and a **Housing Density** of **8.264units/ha**, replaced with one block containing **6 flats** fronting **Woodmere Gardens** and one Block of **3 Terraced Units** **Fronting Woodmere Avenue** facing Ashburton Playing Fields.

Existing:

21 Woodmere Gardens							
Existing	Site Area		1210	sq.m.	0.121	ha	
	Site Area (ha)	Dwellings	Habitable Rooms	Bedrooms	Bed Spaces	Car Parking Spaces	GIA
21 Woodmere Gardens	0.121	1	5	2	4	2	137
Residential Density	41.322	hr/ha	Car spaces per Occupant			0.44	
Residential Density	33.058	bs/ha	Floor Area Ratio			0.11	
Housing Density	8.264	units/ha					

Existing 21 Woodmere Gardens Dwelling parameters (where published)

Parameters of proposal:

	Units	9		Residential Density		256.1983	hr/ha	Uplift Residential Densi		214.876	hr/ha		PTAL	
	Site Area	1210	sq.m.	Residential Density		239.6694	bs/ha	Uplift Residential Densi		206.612	bs/ha		2011	0
	Site Area	0.121	ha	Housing Density		74.38017	unit/ha	Uplift Housing Density		66.116	units/ha		2031	0
New	Floor	Bedrooms	Bed-Spaces available (Persons)	Habitable Rooms (*)	GIA Offered	GIA Required	Built-In Storage offered (Note1)	Built-In Storage Required	Private Open Space offered (sq.m.)	Car Parking Space	Disabled Bay or Electric Charging Point	Cycle Store	Estimated Number of Adults	Estimated Number of Children
Apartment Unit 1 (Disabled)	Ground	2	3	3	76	70	1.5	2	50	1	-	2	2	1
Apartment Unit 2	Ground	2	3	3	67	61	2	2	36	1	-	2	2	1
Apartment Unit 3	First	2	3	3	74	74	nil	2	6	1	-	2	2	1
Apartment Unit 4	First	3	4	4	90.8	74	Not Stated	2.5	7	1	EC	2	2	2
Apartment Unit 5	Second	1	2	2	50	50	nil	1.5	6	1	-	2	2	0
Apartment Unit 6	Second	2	3	3	74.5	61	Not Stated	2	7	1	DB	2	2	1
Terraced Unit 7	Ground	1	1	2.5			nil		45.5			2		1
	First	2	3	2	88.5	84	1.5	2.5	17	1	-		2	1
Terraced Unit 8	Ground	0	0	2			nil		29.5			2		
	First	2	3	2	82	70	1.5	2	16	1	-		2	1
Terraced Unit 9	Ground	1	1	2.5			nil		130			2		1
	First	2	3	2	88.5	84	1.5	2.5	15.5	1	-		2	1
Totals		20	29	31	691.3	628	8	19	365.5	9	0	18	18	11
* 0.5 Habitable Room open plan Kitchen/Dining/Lounge				Car Spaces per occupant			0.31		Floor Area Ratio (FAR)		0.57			
Average hr/unit		3.44 hr/u		Car Spaces per adult			0.50							
Note 1		Excluding Wheelchair Storage (Flat 1)												

Proposed Development parameters as provided by the Applicant.

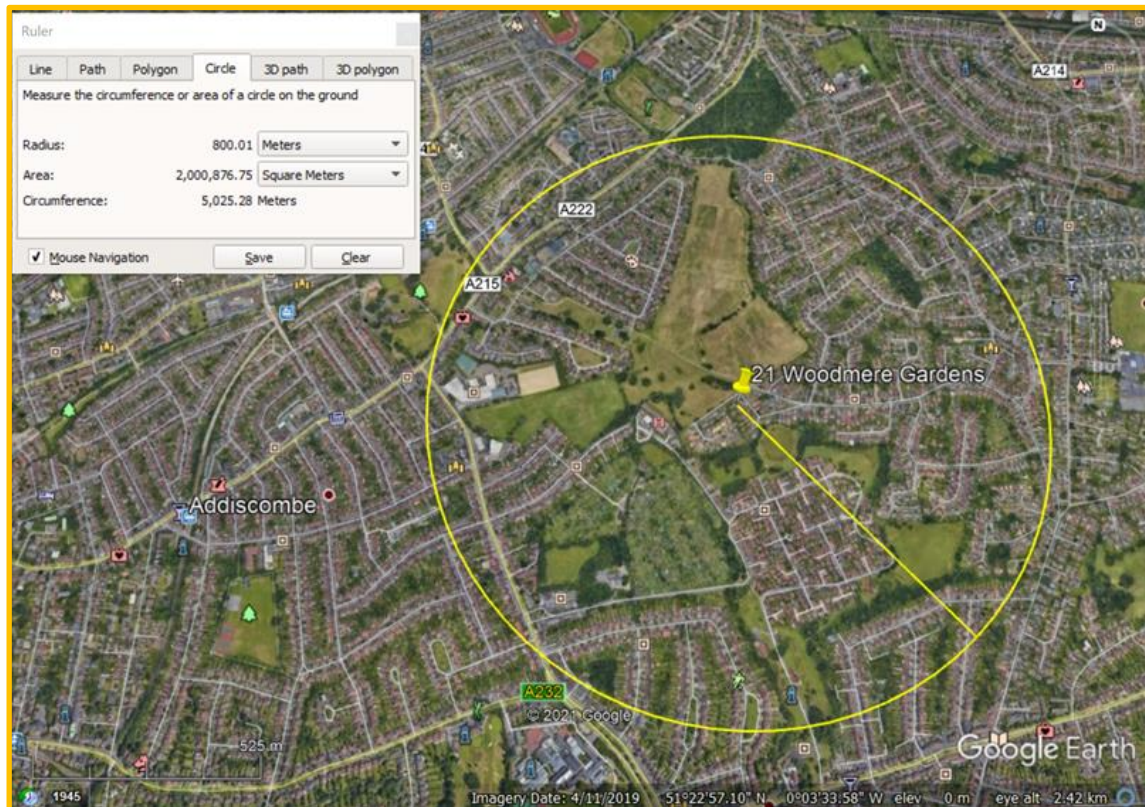
1 Site Location & Character Appraisal:

1.1 The **Local Character** is predominantly **detached** and **semi-detached bungalows**, with garages and associated generous medium sized garden space but with **PTAL** at the **worst-case level** of **PTAL Zero** and **forecast to remain at PTAL Zero up to 2031**. Even so, a very pleasant and sought after suburban residential area. However, the recent clusters of redevelopments along Woodmere Avenue with high density blocks of flats now under construction, are significantly changing and eroding the pleasant character of this locality and will place additional pressures on the existing available supporting infrastructure.

1.2 The Google Earth image (below) illustrates the development site for this proposed development at **21 Woodmere Gardens** which, together with **Public Transport Accessibility Level (PTAL)** of **Zero**, is over **800m** radius from any **Train Station** or **Tram Stop** and is 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**.

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.”*



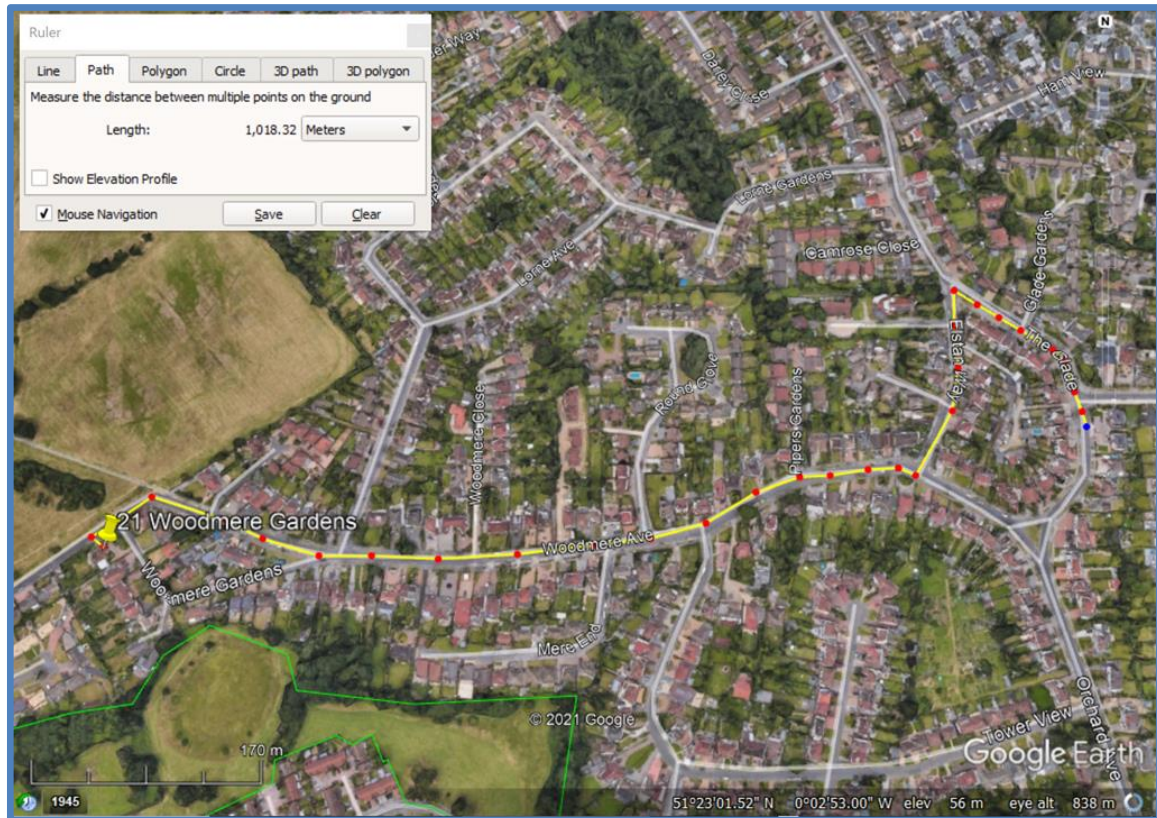
Google Earth Image showing Location of 21 Woodmere Gardens exceeding 800m from any Tram/Train Station and exceeding 800m from the nearest Local or District Centre.

1.3 Public Transport Accessibility:

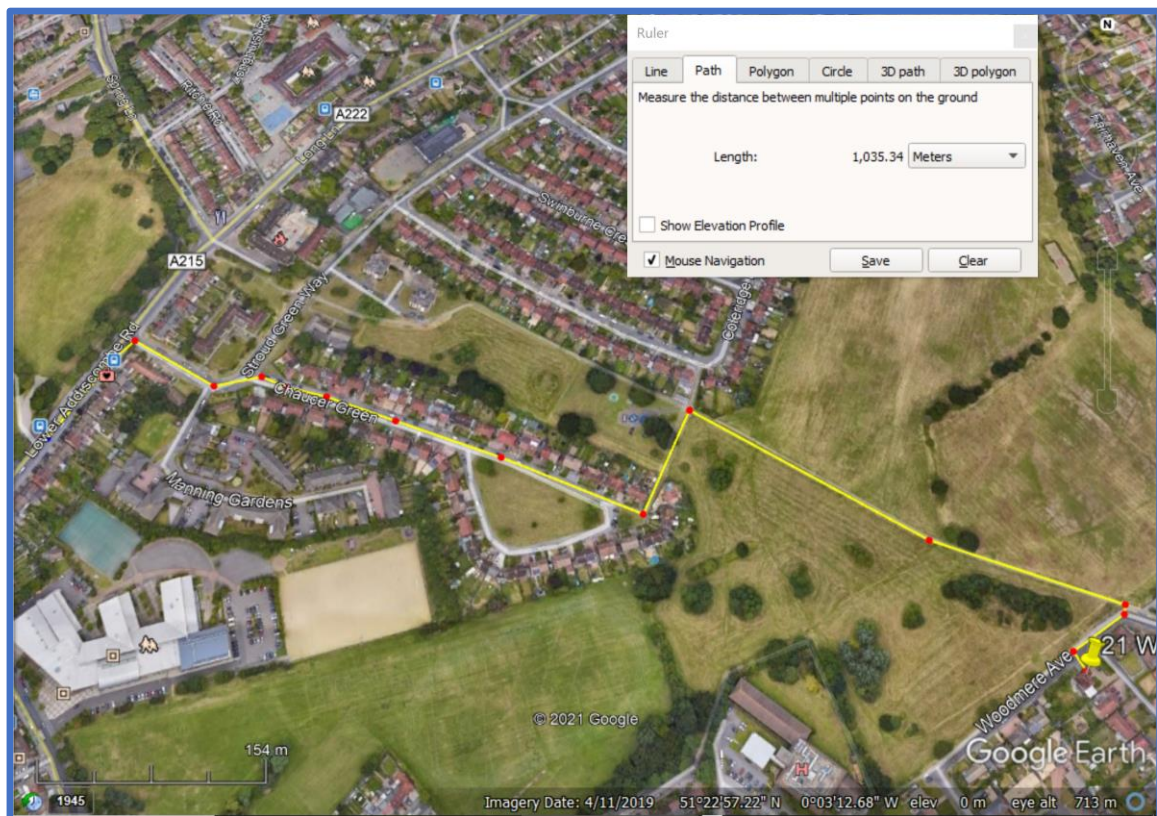
- 1.3.1 Woodmere Gardens** has an extremely poor level of Public Transport Accessibility Level (PTAL) at **PTAL Zero** provided by a single decker **367 Bus Service** between **Bromley** and **West Croydon** via **The Glade** (between the **A232** and the **A222**) via a winding diverse route at service intervals averaging **≈20 minutes**, and the **289** service between **Elmers End** (A222/A215) to **Purley** via West Croydon.
- 1.3.2** Walking distances to the nearest **367 Bus Stops** in The Glade is about **≈879m**, (Bromley direction bus stop) and **≈1018m** (for Croydon direction).
- 1.3.3** The nearest **289 Bus Stops**, across the Ashburton Playing Fields, to the **A215/A222 Bus Stops** at **≈950m** toward Croydon/Purley and **≈1035m** toward Elmers End.

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

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

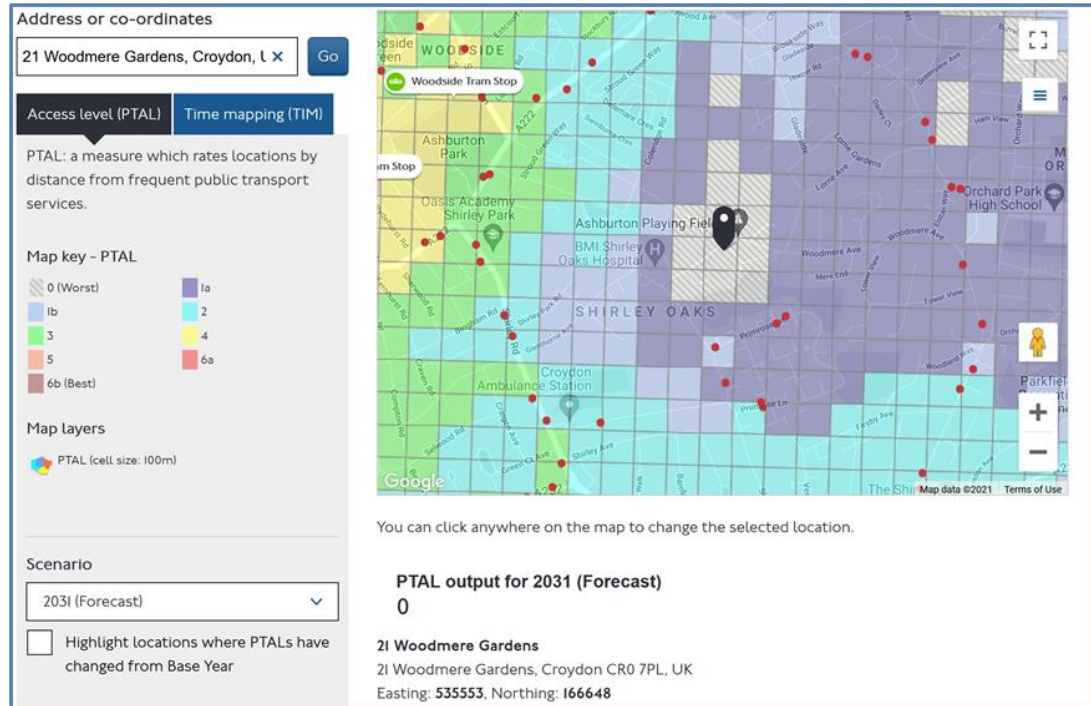


Walking Distance to the Glade 367 Bus Stops



Walking Distance to the A222/215 289 Bus Stops

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TfL WebCAT showing PTAL Zero for the Site forecast to 2031

2 **General Comments on Design & Character**

- 2.1 The proposed development is dominant and out of keeping with the local character of Single Storey Detached and Semi-Detached Bungalows and two Storey Detached and Semi-Detached Houses with generous spacious gardens.
- 2.2 The ground floor Apartment **Unit 1** is adjacent to the **Disabled Parking Bay #6**. It would be more appropriate to number the parking bays to relate to the accommodation apartment nos., such that there is no confusion. Thus, numbered anticlockwise from **#1 (Disabled) bay** allocated to **Apartment #1 (Disabled Facilities)**.
- 2.3 The proposal does NOT meet the required minimum **In-Built Storage Space** as indicated in the Assessment Parameters Table above for this proposal. Out of the nine units only one (Apartment 2) is **compliant** with the required minimum built-in storage capacity. All remaining are **deficient** in meeting the minimum in-built Storage Capacity for the relevant apartment. The **New London Plan Policy D6 - Housing quality and standards** at **Table 3.1** states “these are **MINIMUM** requirements that should be **exceeded if at all possible**”. Failure to meet these **minimal space Standards** gives a good indication of **overdevelopment** of the ‘**Site Capacity**’ as the developer is squeezing as much as possible onto a limited site area at the expense of **minimum space standards** and other requirements, such as **play space** for children, **communal open space** and **off-street parking** provision.
- 2.4 The Terraced **Units 7 and 9** have the single bedroom (probably a child’s bedroom) on the ground floor adjacent to the front entrance to the dwelling. This is a potential design hazard as a young child could innocently leave the premises in the middle of the night and be locked out unbeknown to the parents sleeping on the first floor. This is considered an **inappropriate** and inconsiderate design for family accommodation.

2.5 The requirement of **DM13.1** has been breached as the refuse and recycling facilities (Bin Stores) for the three terraced units are located in FRONT of the Woodmere Avenue Building Line and thus **non-compliant** to **Policy DM13.1** (See below).

2.6 Croydon Local Plan at **Para 6.47 & DM13.1** States:

6.47 Poorly planned piecemeal development of garden land can have significant negative impacts on local biodiversity, amenity, and character. It can also result in noise and visual intrusion into neighbouring property, **interrupt predominant building lines along streets and weaken the predominant built form** and architecture. In landscape terms it can also result in weakened landscape character with loss of trees, including street trees, to make way for new access roads.

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:

- a. 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;**

2.7



The established existing building line set back along Woodmere Gardens is $\approx 12.2\text{m}$ and along Woodmere Avenue $\approx 5.3\text{m}$. The proposed development apartment block building line fronting Woodmere Gardens is $\approx 12.8\text{m}$ and for the flank (northwest elevation) facing Woodmere Avenue is $\approx 2\text{m}$ tapering to $\approx 1.6\text{m}$. The proposed terraced block fronting Woodmere Avenue, building line is $\approx 2.8\text{m}$ tapering to $\approx 2\text{m}$. The proposed development apartment block and terraced units fronting Woodmere Avenue is therefore **non-compliant** to Croydon Local Plan Policy Para **6.47**, and **Policy DM13.1**.

Proposed Ground Floor Terraced Dwellings Units 7, 8 & 9.

3 The Croydon Local Plan & The London Plan 'Growth' Policies.

3.1 The LPA has a **Statutory requirement** ^[4] to ensure that proposed developments are **Sustainable** – (Section 39(2) of the Planning and Compulsory Purchase Act 2004) and **NPPF** ^[5] **Section 2 - Achieving sustainable development**. In order to comply with this **legal requirement**, a criterion or definition of sustainability and the measurable quantifiable parameters for assessing sustainability within the proposed development **Site Capacity** are necessary to comply with the definition of the **sustainability criterion** in the Local Plan but **are conveniently omitted** by the Spatial Planning authors of the adopted Local Plan.

3.2 **Croydon Local Plan Policy Table 6.4 - Accommodating growth:**

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

Croydon Local Plan Policy for "Growth" at DM10 Table 6.4

3.3 The Croydon Local Plan 'Growth' Policies in **Table 6.4**, **DM10.1 to DM10.11 or DM34 to DM49 and DM36 to 49** **'purports'** to describe **"Growth"** by either **"Redevelopment"** or **"Evolution"** by **regeneration**, but gives no definition of the acceptable magnitude of growth in terms of **'Site Capacity'**, **'Local and future infrastructure'** ^[6] or **'Public Transport Accessibility'** ^[7] 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 d) or Para 35, a) Positively prepared, b) Justified, c) Effective & d) Consistent with National Policy or more importantly the Statutory requirement to ensure **'Sustainable Developments'**. In fact, the Policy is quite **"meaningless"** and **"nugatory"** but subject to the **"professional"** judgment of Case Officers without objective justification.

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

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

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

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

- 3.4 The 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** ^[8] or to determine the criteria by which areas *‘inappropriate’* for *“Incremental intensification”* should be assessed.
- 3.5 It is noted that the *“Pre-Application Discussions”* (Para 4 Design & Access Statement) did not include any assessment of *‘Site Capacity’* limitations or Growth Limits appropriate for this proposal at this location and no evidence of guidance ^[9] was given to meet the objectives of the **London Plan Policy D3** on the *“Design-Led-Approach” or the NPPF Design Code Assessment guidance.*
- 3.6 It is not clear how this proposal meets or fails the **statutory requirement** of *sustainable development*, ^[10] including assessment of *‘site capacity’* and other supporting *sustainable infrastructure* requirements including the methodology of assessment. *It is unacceptable that a determination based upon a Case Officer’s ‘subjective prejudicial assessment’ can be recommended without Development Management logical justification of ‘sustainability’.*

4 New London Plan (Published 2nd March 2021)

- 4.1 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** 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.
- 4.2 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!
- 4.3 **Para 4.2.4** of the **New London Plan** ^[11] 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 21 Woodmere Gardens is **PTAL Zero** (*the lowest possible*), and the development site is beyond the **800m** limits of these defined requirements for *“Incremental*

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

[9] Pre-Application Comments – Design and Access Statement.

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

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

Intensification” and as such the locality of this site is therefore **‘inappropriate’** for **“Incremental intensification”**.

4.4 It is unlikely that the Croydon Plan will include any guidance to define the appropriate **‘Gentle Densification’** or **‘Design Code’** for this proposed development at this location, prior to its Review and adoption in 2022 unless included in a Supplementary Planning Guidance (SPG) intermediate Policy clarification. If a **‘Design Code’** is available for this application, we request that it be described and defined in the case Officer’s Recommendation Report.

4.5 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**.”*

4.6 This assertion is **totally flawed** for this location as shown by the recent approved developments in just the MORA post Code Area as detailed in the Histogram below. As Croydon LPA does NOT include **‘Shirley’** in the Borough’s **“Infrastructure Delivery Plans”** ^[12], and is not identified in the **‘Borough Wide’** lists, the interpretation of **Para 3.2.4** indicates **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 ^[13] **as the locality does not meet the “normal” criteria statement of London Plan Policy para 3.2.4 for ‘infrastructure’ delivery.**

4.7 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”**.

4.8 In order to meet the objectives of the **London Plan Policies**, we have investigated possible **Design Code** parameters which are appropriate for this site. This information is referenced in the **NPPF Supporting information** ^[14] **para 129, ‘National Design Guide’ and ‘National Model Design Codes’.**

^[12] <https://drive.google.com/file/d/1v7u6lD7rqzjJDsMwQueuf5-c7x6GpZel/view>

^[13] 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).

^[14] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf

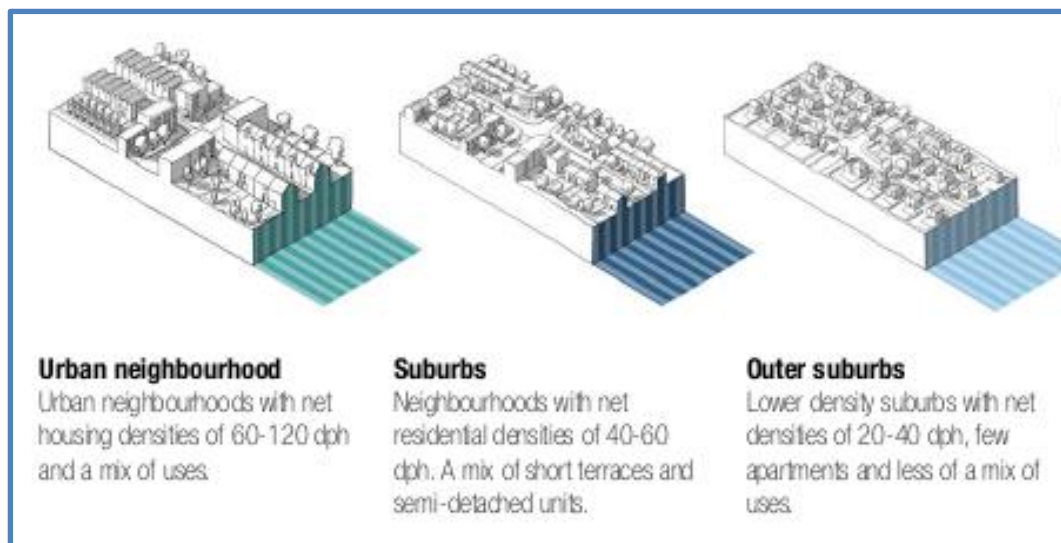
5 **NPPF Design Code Parameters for Woodmere Gardens:**

- 5.1 The Post Code Area CR0 7PL contains **19 dwellings** and **47 occupants** in an area of **≈1.66ha** giving an occupancy of **2.47 persons per dwelling**. The Set Back averages from the front curtilage (some do not have pavements or footways) averages ≈11m and the average rear garden lengths are ≈30m.



Post Code Area CR0 7PL

5.2 **NPPF Design Code 2B Coding Plan** ^[15]



^[15]

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/957205/National_Model_Design_Code.pdf

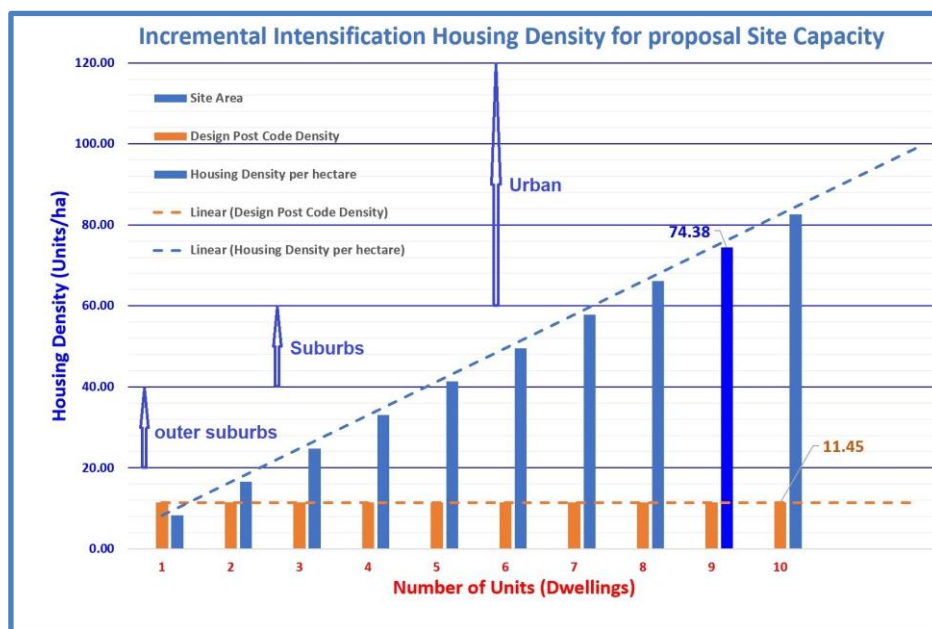
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- 5.3 Shirley is defined as a “**Suburb**” in the Croydon Local Plan (2018) at “**Places**” of Croydon which the **NPPF Design Code 2B page 13** states Suburban should be **40 to 60 dwellings per hectare** but **Code 3B Para 52 Figure 19** states **Suburban Housing Densities should be within 30 to 50 Dwellings per hectare**.

Shirley Vision, opportunities, constraints and change up to 2036

Vision

11.199 Shirley will continue to be a **suburb** surrounded by substantial green space with improved cycle and pedestrian links. The vibrant Local Centre, with a range of retailing and independent shops will continue to serve the local community. A mature and rejuvenated Shrublands will be served by both local shops as well as those on Wickham Road. Shirley Road and Spring Park/ Bridle Road Neighbourhood Centres will be supporting the existing and future community with services and facilities beyond a retail function.



Incremental Increase in Housing Density for Site of 0.121ha.

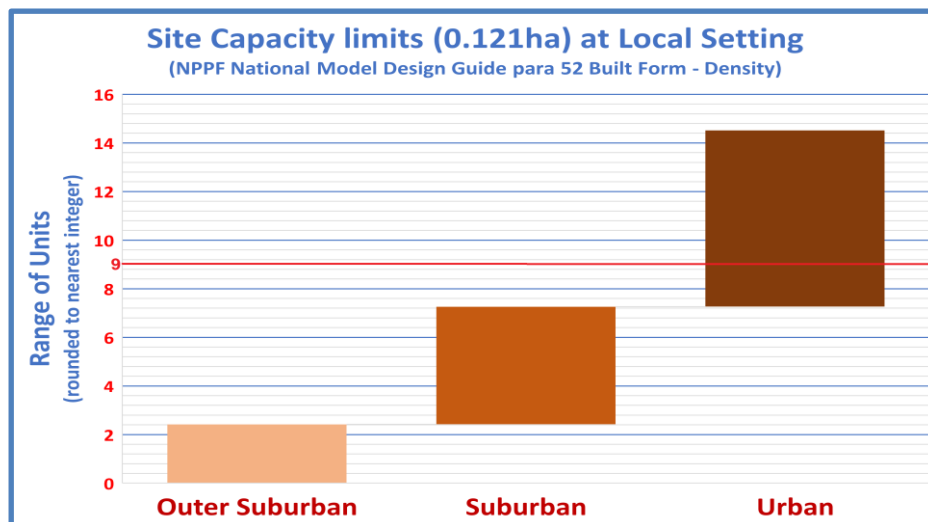
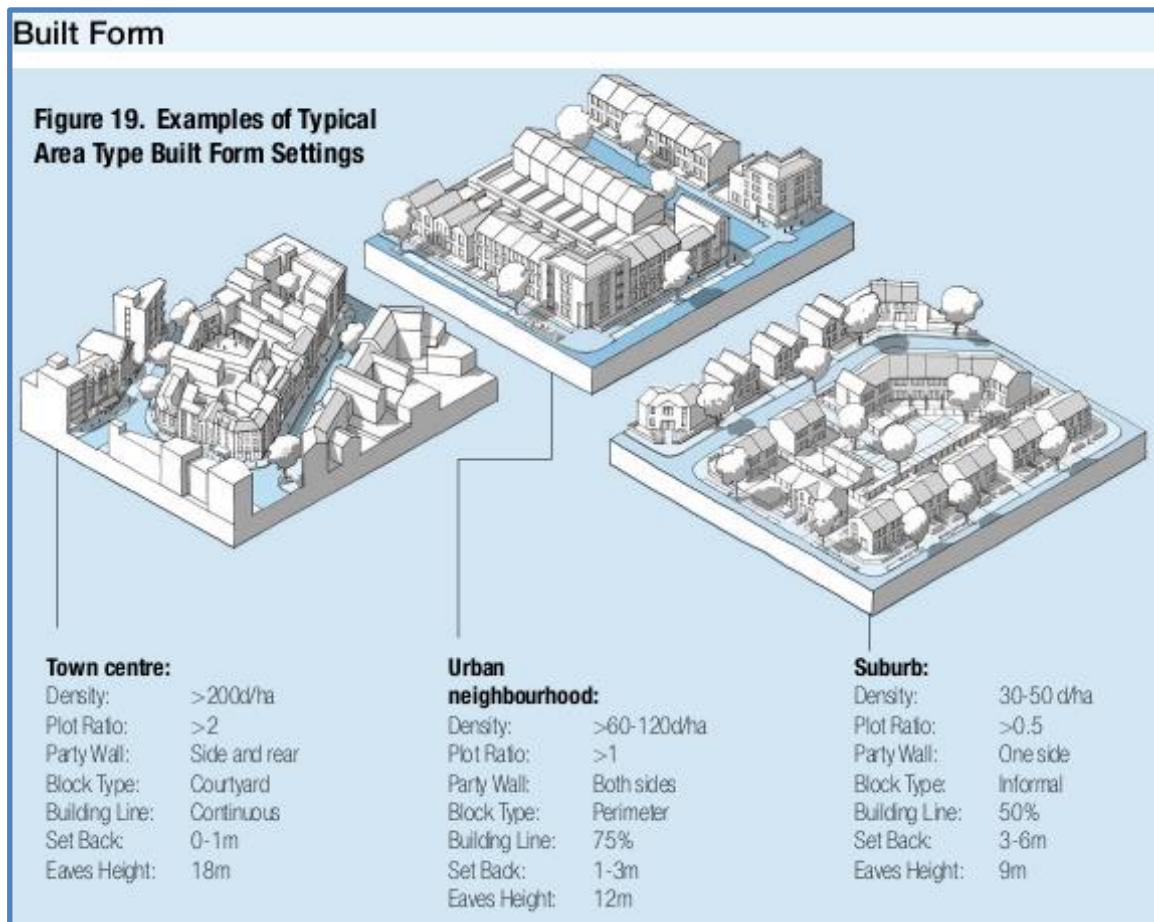


Illustration of Number of Units (Site Capacity) appropriate for a Site Area of 0.121 hectare in various Setting Locations.



- 5.4 A housing Density of **74.38 units/ha** at a Location with PTAL of **Zero**, does **NOT** meet the **Policy D3 - Optimising site capacity through the design-led approach** as the setting could be considered as **"Outer London Borough Suburban"** Typology or even simply **"Suburban"**. The **NPPF Nation Model Design Guide** at **Code 3A para 52 - Built Form**, quotes even greater restriction for **suburban Densities of 30 to 50 dwellings per hectare** ^[16], but we have presumed the more lenient **Code 2B value of 40 to 60 Dwellings per hectare**.



- 5.5 In order to meet the **NPPF National Model Design Guide** ^[17] **Code 2B, Built Form – Density requirements of 40 to 60 u/ha, (i.e., worst case)** the site capacity for **0.1210ha** would need to be in the range:
- Outer (London) Suburban Setting** between **2.42 (20 x 0.121)** and **4.84 (40 x 0,121) Units** (Rounded 2 to 5).
 - Suburban Setting** between **4.84 (40 x 0.121)** and **7.26 (60 x 0.121) Units** (Rounded 5 to 7).

[16]

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1009539/NMDC_Part_1_The_Coding_Process_web.pdf

[17]

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/957205/National_Model_Design_Code.pdf

- c) **Urban Setting** between **7.26** (60×0.121) and **14.52** (120×0.121) (Rounded 7 to 15).

When the actual proposal is within an '*outer (London) suburban*' or '*suburban*' setting of **9 Units** which is in the range of 7 to 15 Units appropriate for an '*Urban*' Setting indicating an overdevelopment for a '*Suburban*' or '*Outer Suburban*' Setting. The proposed development is therefore NOT compatible with the available '*Site Capacity*' (London Plan Policies D1, D2, D3). The proposal of **74.38 units/ha** at **9 units** would require the locality to be '*Urban*' which by local plan definition, at **PTAL Zero** and any local observation, it clearly is NOT. This Proposal is therefore obviously an overdevelopment for the local Suburban or Outer Suburban area.

- 5.6 If the LPA Case Officer disagrees with the **NPPF National Model Design Guide** parameters we would expect to be informed of the justification for any deviation from these Design Code Values.
- 5.7 The **Floor Area Plot Ratio (FAR)** is given by **GIA/Site Area** and for a Suburban Area **should be (Less Than) < 0.5** whereas this proposal has **Floor Area Ratio** (in m^2) of $691.3/1210 = 0.57$. Thus, the proposal is **Non-Compliant** to the **Design Code** recommendation for **Floor Area Ratio (FAR)** in a **suburban** locality.

Floor Area Ratio	Town Centre	> 2
GIA/Site Area	Urban Neighbourhoods	> 1
This is metric GIA divided by the Site Area in m^2	Suburbs	< 0.5

This is more evidence of overdevelopment.

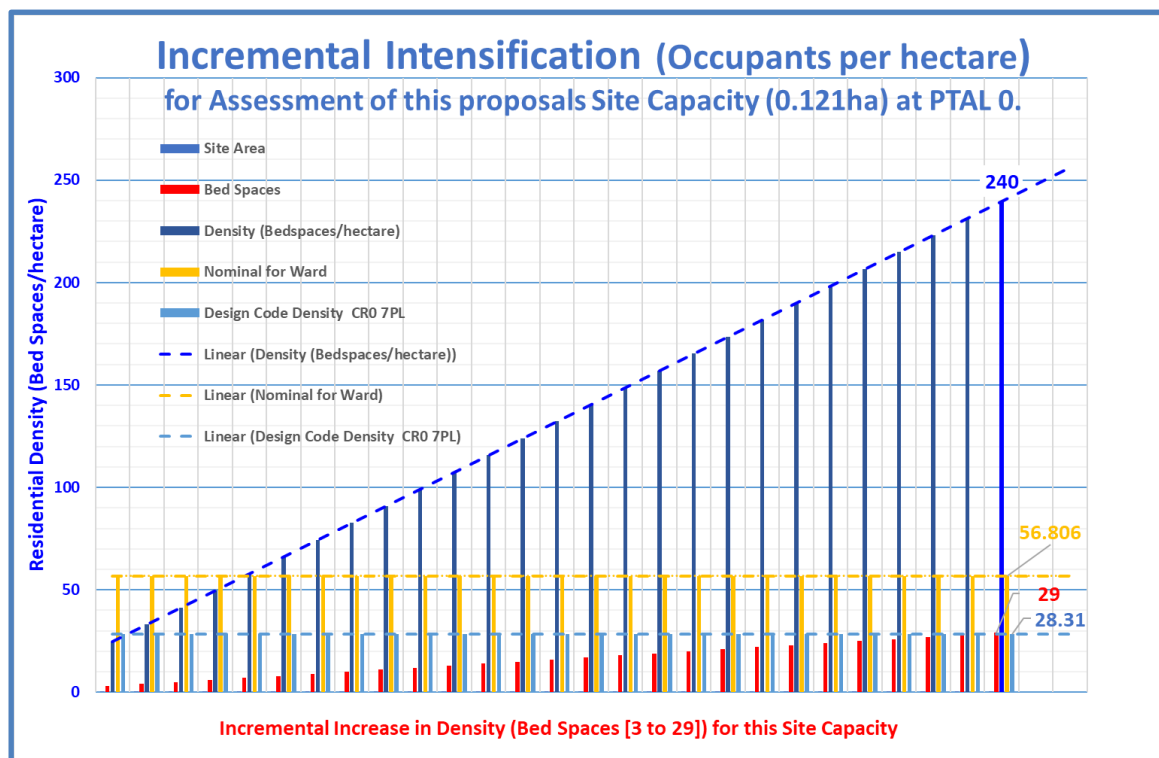


Illustration of Incremental Intensification (Bedspaces/ha) for Site Capacity of 0.121ha in an outer (London) suburb or suburban setting.

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Population Density Analysis - Shirley North Ward					
Shirley North Ward [2019]	15058		Undeveloped Open Spaces:		
Area Km ²	3.279	km ²	Ashburton Playing Fields	24	ha
Area Hectares	327.9	ha	Long Lane Wood	6	ha
Population Density (per km ²)	4592.25374	per km ²	Monks Orchard & Orchard Way Primary School (Playing Field)	2.4	ha
Population Density per ha (2019)	45.9225374	per ha	Orchard Park High School (Playing Field)	2.25	ha
Annual Population Change (2011-2019) %	0.02	%	Parkfields Rec	4.4	ha
Popuation Shirley North Ward (2021)	15660		Glade Woods, Greenview Green & Kempton Walk	1.75	ha
Population Shirley North Ward per Km ² (2021)	4775.94389	per km ²	Primrose Lane (Allotments & Gardens)	4	ha
Population Shirley North Ward per ha (2021)	47.7594389	per ha	Shirley Oaks Village Green	6	ha
Area of Shirley North Ward minus Open Spaces	275.68	ha	Allotments (Tower View, Ash Tree Way)	1.42	ha
Average Population Density (Built Area)	56.8061521	per ha	Total (Undeveloped Open Green Space Area)	52.22	ha

GLA Data Set for Shirley North Ward Population Density

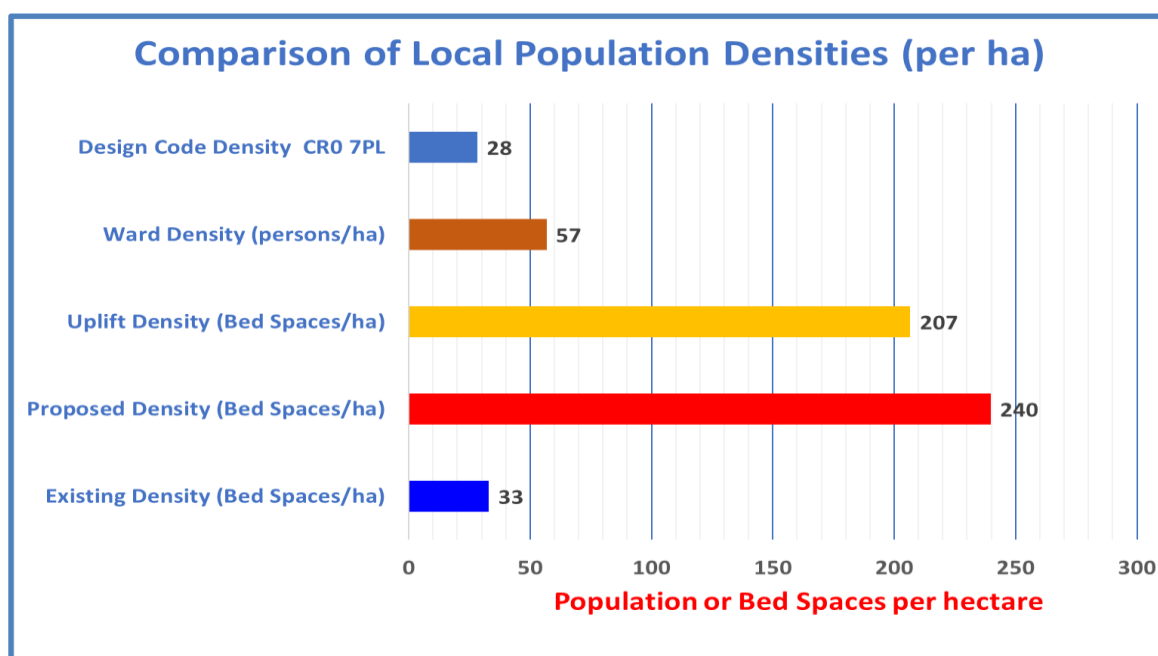


Illustration of Local Population Densities in People or Bed Spaces per Hectare

- 5.8 The Dwellings and local supporting infrastructure is used by people (*not Housing Units*) and therefore there should be some equivalent limits to local *Population Density* in relation to the '*Site Capacity*' and '*Residential Density*' (*Bedspace/ha*), to ensure adequate spatial accommodation standards and *supporting infrastructure* for *sustainable development* are met, but I have not found any Policy Statement to this effect in the available published supposedly professional guidance. *Astonishing!*
- 5.9 The **Residential Density** of **239.67 bed spaces or occupants per hectare** does NOT compare favourably with the 56.8 person per hectare average for the **Ward (GLA data)** or the 28.31 occupants per hectare for the **Post Code Area**. (*The professional Planners don't seem to be concerned about people and their needs - just buildings!*)
- 5.10 We therefore request the Case Officer indicates the *assessment methodology* used to assess and define the '*Site Capacity*' for this proposed development, including the definition and evaluation of all support parameters used for this assessment as required of the **New London Plan Policies D1, D2, D3 and H4**.

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

6.1 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

6.2 These **"measurements of density"** London Plan Policy D3 para 3.3.22 (items 1 through 4) although required, the Policy fails to define any **methodology** to actually use these parameters to evaluate **'site capacity'** or 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 ^[18] or Policy H2 B. ^[19]

6.3 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 the locality **'inappropriate'** for **"Incremental Intensification"** as referenced in the London Plan Policy D3 paras 3.2.4 and 3.3.22.

7 'Transport for London' Connectivity Accessibility Assessment.

7.1 The Sustainability Appraisal (SA) of the Croydon Local Plan Review - Interim SA Report December 2019. ^[20] Reference 11 Page 18 States:

"Although the density matrix is not included within the draft London Plan (which anticipates higher densities in new development), it remains a useful proxy to estimate the potential housing capacity of sites."

See Para 5.18 of the Appraisal - **QUITE! - So why was the Density Matrix dropped from the New London Plan? The replacement Policies are 'extremely complex and subjective and probably unenforceable' as the policies could NOT sustain defence of a legal challenge'.**

7.2 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.

^[18] <https://consult.london.gov.uk/good-quality-homes-for-all-londoners>

^[19] <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/london-plan-2021>

^[20] [https://www.croydon.gov.uk/sites/default/files/articles/downloads/Croydon Local Plan%20Interim SA report.pdf?src=redirection-fix](https://www.croydon.gov.uk/sites/default/files/articles/downloads/Croydon%20Local%20Plan%20Interim%20SA%20report.pdf?src=redirection-fix)

- 7.3 **Transport for London (TfL) Connectivity Assessment** (Section 2 Para 2.2) ^[21] recommends suburban Densities at Public Transport Accessibility Levels (PTAL) in the range 0 - 1 (this case "Zero") to support a **Residential Density** of **150 to 200hr/ha** and **Housing Density** of **40 to 65 units/ha** at an average of **3.44 hr/unit**.
- 7.4 The **PTAL** at 21 Woodmere Gardens is **PTAL 'Zero'** and is forecast to remain at '0' until at least **2031**. The proposal has **Residential Density** of **256.2hr/ha & 239.67bedspaces/ha** and a **Housing Density** of **74.38 Units/ha**.
- 7.5 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.
- 7.6 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** (at PTAL of 0, significantly at the lower end).

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 256.2hr/ha then requires a PTAL of:

$$\text{Residential Density } 256.2 = 50x + 150 \text{ therefore } x = \text{PTAL} = 2.124$$

$$\text{Housing Density} = y = mx + c \text{ where } m = \left(\frac{65-40}{1-0} \right) = 25$$

$$\text{Housing Density} = y = 25x + c \text{ where } x = \text{PTAL}$$

c is found by the known max and min equations $65 = 25 * 0 + c$ & $40 = 25 * 1 + c$

$$\text{Therefore } 105 = 25 + 2c \text{ and } c = \frac{105-25}{2} = c = 40$$

A Housing Density of 74.38 Units/ha requires a PTAL of:

$$\text{Housing Density} = y = 74.38 = 25x + 40 \text{ therefore } x = \text{PTAL} = 1.375$$

$$\text{Residential Density} = y = 150 * 0 + 150 \text{ then } y = 150 \text{ hr/ha at PTAL } 0$$

$$\text{Housing Density } y = 25 * 0 + 40 \text{ then } y = 40 \text{ units/ha at PTAL } 0$$

- 7.7 The '**Site Capacity**' would require a **PTAL of 2.124** for a **Residential Density** of **256.20hr/ha** and **PTAL 1.375** for a **Housing Density** of **74.38 Units/ha** when the **actual and future PTAL** is '**0**' (**Zero**). This is not realistic when the London Plan policy para 4.2.4 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

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

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 Capacity'**.

- 7.8 This analysis using the TfL WebCAT ^[22] takes account of local **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'**.

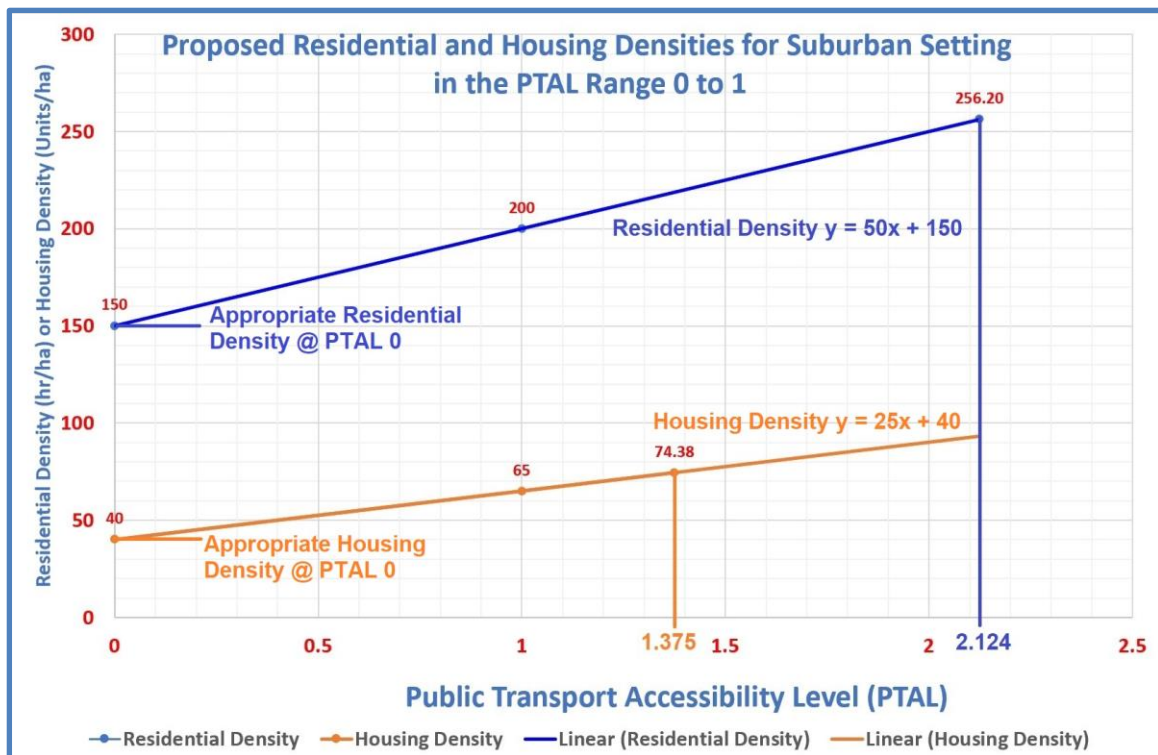


Illustration of Calculations of proposed development Residential and Housing Densities at PTAL 0 using the TfL WebCAT Connectivity Assessment Guide.

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

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

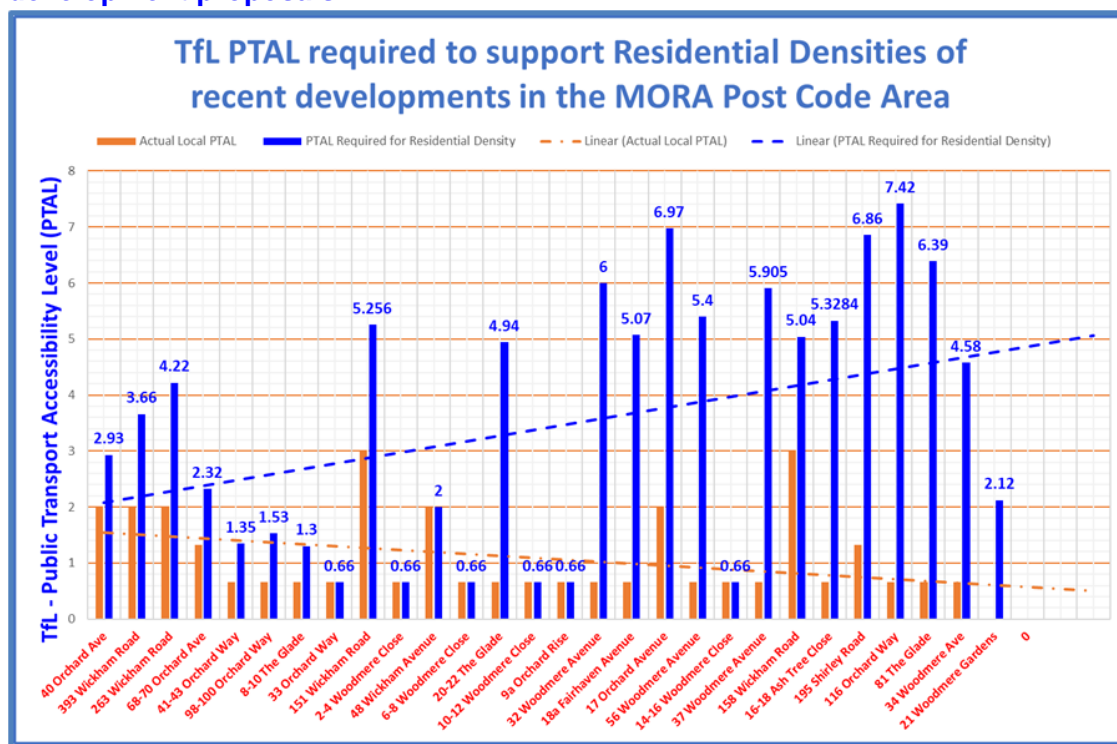
following forms of development: residential conversions, **redevelopment**, extensions of houses and/or ancillary residential buildings.”

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 below) ^[23] 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.

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 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 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**. Case Officers do not challenge **cumulative effects** of development proposals.



Recent Year-on-Year Cumulative Windfall Redevelopments.

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

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

9.2 The **MORA Post Code Area** has seen significant '*cumulative developments*' since 2016 representing a *significant increased intensification* (see Histogram above) ^[24] with absolutely no improvement in Public Transport Accessibility as based upon TfL WebCAT analysis or any improvement to other supporting services infrastructure.

9.3 The recent cumulative developments in the MORA post code area (See Histogram 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. It also provides evidence that the Croydon LPA have ignored the previous adopted London Plan Policy 3.4 – Optimising Housing Potential, since at least 2015.

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 adequate '*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 is not fully met and gives further evidence of overdevelopment.

11 Play Space for Children

11.1 The number of Children of the **Apartments 1 to 6** would probably be around **6** which according to the **London Plan** requires **10m²** play space per child = **60m²**. The communal open space is stated at **140m²** in total. It can be assumed therefore than the communal open space will be reduced by the **60m²** Play Space equalling **80m²** for the occupants of the apartments. **There is NO Policy to determine appropriate communal open space per occupier**, another omission of the professional Standards.

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



Terraced Dwellings Parking and Refuse Recycling Bins

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

- 12.1 The proposed development Parking Bays for the terraced dwellings are configured fronting Woodmere Avenue 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. **There are no sight lines prior to the footway.**
- 12.2 There are NO provisions for **Electric Charging Points** for the terraced dwellings car park spaces.
- 12.3 The Refuse Storage Bins for the Terraced dwellings are positioned in **front of the Building Line** and therefore in breach of **Croydon Local Plan Policy**.

13 Housing Targets

- 13.1 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**".
- 13.2 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**.
- 13.3 Croydon Plan Review (2019):
- 13.3.1 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**.
- 13.3.2 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**.
- 13.3.3 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 27 dwellings**, including this application.
- 13.3.4 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**, ^[25] (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"**.

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

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

13.3.5 The cumulative average estimated over the two years is $(48 + 21 + 27)/(2+8/12) = 36$ per year (up to Aug 2021) which is for just the **MORA** post code area, a 74.7573% increase above the target for the whole of the **'Shirley Place'**.

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

13.3.7 The MORA Post Code Area applications approvals and waiting approval for 2019 to 2021 dwellings are as shown in the Tables below.

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

13.3.9 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.

13.3.10 Thus, any statements by the case officer inferring **"an acute need for new homes"** would be considered extremely **'disingenuous'**, 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**?

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
34 Woodmere Avenue	21/02212/FUL	Waiting	1	6	5
21 Woodmere Gardens	21/03702/FUL	Waiting	1	9	8
75 Shirley Avenue	21/02622/FUL	Waiting	1	4	3
			5	32	27

Recent Developments in the MORA Post Code Area.

13.3.11 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 ^[26]:

b) the neighbourhood plan contains policies and allocations to meet its identified housing requirement;

c) 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

d) the local planning authority’s housing delivery was at least 45% of that required ^[27] over the previous three years.”

We have clearly shown that Shirley North has already met its housing targets for the whole of the **Shirley Place** over the last three years, and therefore has more than met the housing **“need”** for the MORA Post Code locality.

13.3.12 It would be much preferred if the Housing Targets were set against Ward Boundaries such that they could be monitored by Ward Councillors and would give some democratic accountability for the setting and realisation of Housing Targets for the local communities.

[26] Transitional arrangements are set out in NPPF Annex 1.

[27] Assessed against the Housing Delivery Test, from November 2018 onwards.

14 Summary and Conclusions:

- 14.1 The proposal has inadequate **in-built storage** for the future occupants which is an indication of overdevelopment as the Developer is attempting to squeeze as much as possible into a limited site area which does not allow the **minimum internal space standards** to be implemented. **The London Plan** suggests these space standards are a '**minimum**' and should be exceeded, if at all possible, which means reducing the densities accordingly such that all space standards can be generously met.
- 14.2 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) Policies D2 and D3**.
- 14.3 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** for **Sustainable Development** ^[28] 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.
- 14.4 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's site capacity to provide as many units as possible (9 in this case), that can be squeezed onto a site to maximise profit at the expense of supporting a '**Sustainable Development Site Capacity**'*.
- 14.5 This proposal does NOT provide 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.
- 14.6 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. We have used the NPPF references and the **National Design Guide** and **National Model Design Code** where appropriate.

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

- 14.7 The **NPPF National Model Design Code 2B** ^[29] indicates Housing Density for Suburban localities should be within the range **40 to 60 units per hectare**. This development proposal has housing density of **78.38 Units per hectare** which exceeds the **Guide** maximum of **60** by **30.6333%** and should therefore be refused. This proposal should tend toward the lower limit of **40 u/ha** as the **PTAL is Zero**.
- 14.8 The **NPPF National Model Design Code 'Built Form'** indicates that the **Floor Area Ratio (FAR)** in a suburban setting should be (Less than) **<0.5**, whereas the **Floor Area Ratio** for this proposed development is **0.57** and should therefore be refused.
- 14.9 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 Densification"** or **"Gradual, Moderate Incremental Densification"** (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"**.
- 14.10 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**.
- 14.11 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**. ^[30]
- 14.12 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. The applicant should reapply with a more appropriate proposal which meets all planning policies and is within the parameters for **"Gentle Densification"**.
- 14.13 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**

[29]

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/957205/National_Model_Design_Code.pdf

[30]

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf See: **NPPF Paras 60 & 61.**



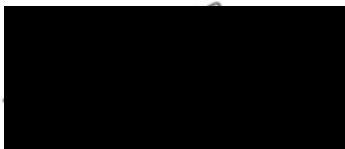
Capacity and the available infrastructure for **sustainable Densities** ^[31] which means the Policies are **'unenforceable'** and **'undeliverable'** which also means the LPA is not meeting its Statutory obligations to ensure Development Proposals are **Sustainable Developments**.

14.14 The proposal would result in the loss of a family home with generous garden space.

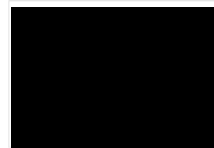
14.15 An approval of this Development Proposal would make a **'mockery'** of all the **NPPF Policies, Design Code Guidance** and **London Plan Policies** referenced in this submission.

Kind regards

Derek



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Nicola Townsend

Cllr. Sue Bennett

Cllr. Gareth Streeter

Cllr. Richard Chatterjee

Croydon Central

Head of Development Management

Shirley North Ward

Shirley North Ward

Shirley North Ward

Bcc:

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

[31] 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).
