

Case Officer – Ms. Victoria Bates  
Development Environment  
Development Management  
6th Floor  
Bernard Weatherill House  
8 Mint Walk  
Croydon  
CR0 1EA

**Monks Orchard Residents'  
Association  
Planning**

16<sup>th</sup> December

Email: [dmcomments@croydon.gov.uk](mailto:dmcomments@croydon.gov.uk)  
[Development.management@croydon.gov.uk](mailto:Development.management@croydon.gov.uk)  
[victoria.bates@croydon.gov.uk](mailto:victoria.bates@croydon.gov.uk)

Emails: [planning@mo-ra.co](mailto:planning@mo-ra.co)  
[chairman@mo-ra.co](mailto:chairman@mo-ra.co)  
[hello@mo-ra.co](mailto:hello@mo-ra.co)

---

Reference	21/06038/FUL
Application Received	Fri 03 Dec 2021
Application Validated	Sat 04 Dec 2021
Address	176 - 178 Orchard Way Croydon CR0 7NN
Proposal	Demolition of existing dwellings, erection of three pairs of two storey 3-bed semi-detached dwellings with roof accommodation and one pair of two storey 2-bed semi-detached dwellings with car parking, formation of accesses onto Sloane Walk together with a new pavement, and provision of cycle, refuse and recycling stores and soft landscaping
Status	Awaiting decision.
Consultation Expiry:	Sat 01 Jan 2022
Decision Deadline:	Tue 25 May 2021
Case Officer:	Ms. Victoria Bates

---

Dear Ms. Bates

Please accept this letter as a formal objection to **Application Ref: 21/06038/FUL** for the Demolition of the existing dwellings, erection of three pairs of two storey 3-bed semi-detached dwellings with roof accommodation and one pair of two storey 2-bed semi-detached dwellings with car parking, formation of accesses onto Sloane Walk together with a new pavement, and provision of cycle, refuse and recycling stores and soft landscaping.

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

**Planning History:**

Demolition of existing dwellings, erection of three pairs of two storey 3-bed semi-detached dwellings with roof accommodation and one pair of two storey 2-bed semi-detached dwellings with car parking, formation of accesses onto Sloane Walk together with a new pavement, and provision of cycle, refuse and recycling stores and soft landscaping.

---

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

21/01635/FUL | Received: Tue 30 Mar 2021 | Validated: Tue 30 Mar 2021 | Status: Decided  
Permission Refused - Wed 14 Jul 2021 | Pending Appeal.

Demolition of existing buildings, erection of a three-storey building comprising 14 two bed flats and provision of associated car parking and amenity space.

176-178 Orchard Way, Croydon, CR0

Ref. No: 05/04112/P | Received: Tue 27 Sep 2005 | Validated: Tue 27 Sep 2005 | Status: Decided

Demolition of existing buildings, erection of 14 two bed flats and provision of associated car parking and amenity space.

176-178 Orchard Way, Croydon, CR0

Ref. No: 05/03658/P | Received: Thu 25 Aug 2005 | Validated: Thu 25 Aug 2005 | Status: Decided.

### Parameters of proposal:

Proposed Development Parameters										
Application Reference:		21/06038/FUL		Residential Density		285.71	bs/ha	Floor Area Ratio		0.66
Units	Site Area:	0.14 ha		Residential Density		271.43	hr/ha	PTAL 176	2031	Zero
8	Site Area:	1400 sq.m.		Housing Density		57.14	Units/ha	PTAL 178	2031	1b
Dwellings	Type	Bedrooms	Bedspaces	Habitable Rooms	GIA Offered	GIA Required	In-Built Storage Offered	In-Built Storage Required	Amenity Space	Car Parking
Unit 1	A	3	5	5	129.02	99	Not Stated	2.5	53.64	1
Unit 2	A	3	5	5	127.38	99	Not Stated	2.5	63.56	1
Unit 3	A	3	5	5	127.38	99	Not Stated	2.5	63.34	1
Unit 4	A	3	5	5	127.38	99	Not Stated	2.5	71.80	1
Unit 5	B	3	6	5	118.72	108	Not Stated	2.5	59.21	1
Unit 6	B	3	6	5	118.72	108	Not Stated	2.5	91.95	1
Unit 7	C	2	4	4	86.14	79	Not Stated	79	75.67	1
Unit 8	C	2	4	4	86.14	79	Not Stated	79	128.54	1
Totals		22	40	38	920.88	770	Not Stated	173	607.71	8



## 1 Comparison with previous proposal

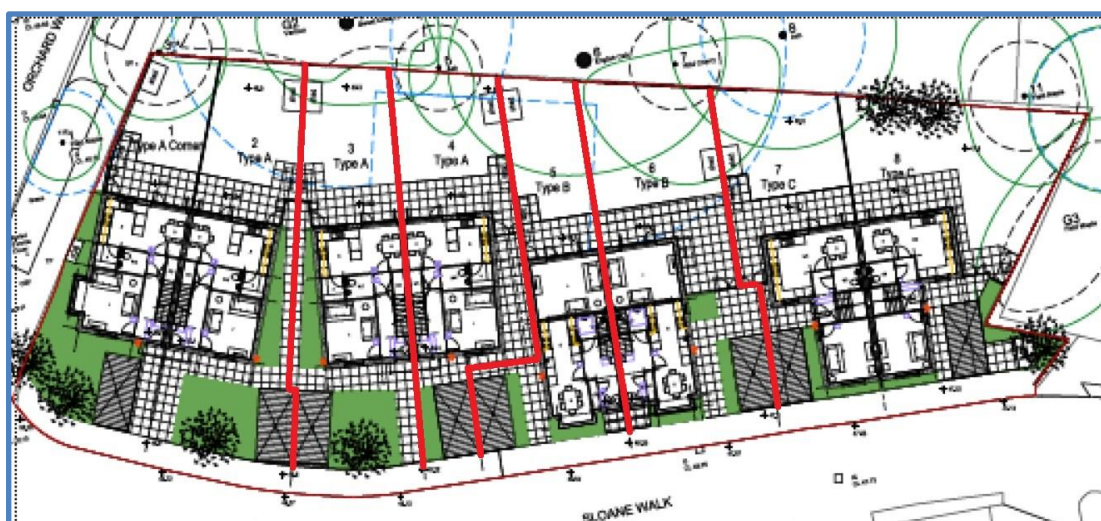
- 1.1 The new proposal is not significantly different from the previous refused proposal which is pending an appeal.
- 1.2 The building footprints seem unchanged.
- 1.3 The accommodation capacities have increased slightly, although the Bed Spaces are not actually detailed. The accommodation is only assessed by looking at the plans.

- 1.4 The similarity of this re-application to the refusal would have been rejected if the previous application appeal had been validated and dismissed. The LPA have the right to refuse to even entertain a similar application that is submitted after an unsuccessful appeal, for a period of up to two years.

## 2 Reasons for Refusal of Application 21/01635/FUL

### 2.1 Reason 1:

- 2.1.2 *"The development would be detrimental to the visual amenity of the site and street scene by reason of the excessive amount of forecourt parking across the site. ..."*
- 2.1.3 The dwelling footprints remain the same as the previous refused proposal. The only changes are Parking Bay rearrangements and reduction from 12 to 8.
- 2.1.4 The Curtilages and Boundaries have not changed from the original which were modified simply to accommodate the Parking Bays, significantly for Unit 5 on what would normally be considered Unit 4's forecourt. The curtilage and boundary is bent to fit! Thus **Unit 4's Front Lounge window view will be Unit 5's Parked vehicle!** Not very comforting for the future occupants of **Unit 4** for the life of the development. This is an obvious indication of failure to follow the presumed normal curtilages in order to squeeze the parking provision within the limitations of the site which is evidence of the development exceeding the capacity of the Site.



- 2.1.5 The "Set Back" has been established by the setbacks of Units 1 & 2 and Units 3 & 4 which is approximately 6.5m. The **National Model Design Code** recommends a 'Set-back' of between 3 to 6 metres (*National Model Design Code, 3.A Guidance for Area Types, Built Form, Figure 19, page 21*). The predominant Set-back in the locality is a minimum of approximately 7m. Therefore **Units 5 & 6** and **7 & 8** which have very limited set-back of approximately <1m from the footpath, fail this guidance.
- 2.1.6 Additionally, the Dining Room Window of both **Units 5 & 6** and the Lounge Window of both **Units 7 & 8** fronting **Sloane Walk**, would be within approximately <1 metre of pedestrians using the footpath. This closeness would seriously compromise the privacy of occupants of **Units 5 to 8** for the life of the development.
- 2.1.7 This is further evidence of overdevelopment as increasing the Set-Back to an acceptable distance would reduce the rear amenity areas to unacceptable levels which is evidence of **"Site Capacity"** limitations at this Setting.



## **2.2 Reason 2:**

2.2.2 *"The design of houses numbered 7 and 8 on the submitted drawings would be out of character with the site and surroundings and would not maximise the opportunities for creating an attractive and interesting environment by reason of the poor siting and massing of the front outriggers. ..."*

2.2.3 See MORA response at paras 2.1.4 to 2.1.7 above.

## **2.3 Reason 3:**

2.3.2 *"The development would be detrimental to the amenities of the occupiers of residential occupiers in Sloane Walk by reason of its siting and layout resulting in loss of privacy."*

2.3.3 See MORA response at paras 2.1.4 to 2.1.7 above.

## **2.4 Reason 4:**

2.4.2 *"The development could result in local traffic congestion/additional local parking stress by reason of loss of on-street parking provision in Sloane Walk. ..."*

2.4.3 The re-application proposal reduces the Parking provision from 12 to 8 and thus further aggravates the overspill and parking stress in the immediate vicinity. This is another indication of excessive overdevelopment, whereby it is not possible for any flexibility of configuration to accommodate the London Plan Residential Parking provision for an exceedingly low PTAL locality as there is insufficient Site Capacity at the Site Setting.

## **2.5 Reason 5:**

2.5.1 *"The position of the vehicle access to house numbered 1 on the submitted drawings would not be safe, secure or efficient ..."*

2.5.2 It is presumed that exiting from Unit 1 Parking Bay is too near the junction with Orchard Way and would be hazardous to any vehicle travelling south on Orchard Way turning into Sloane Walk. The proposed application does NOT change this reason for refusal.

## **2.6 Reason 6:**

2.6.2 *"In the absence of a legal agreement, the application does not offer a contribution towards sustainable transport initiatives in the vicinity to alleviate traffic generation created by the development. ..."*

2.6.3 No Comment.

## **2.7 Reason 7:**

2.7.1 *"The siting and layout of the development could result in the loss of or the putting at risk of valued trees, including trees subject to a Tree Preservation Order, and has not demonstrated a net biodiversity gain ..."*

2.7.2 The re-application proposal has not addressed this reason for refusal as the footprint of the proposal is unchanged.

## **2.8 Reason 8:**

2.8.1 *"The development could result in the putting at risk of a protected species ..."*

2.8.2 No Comment.



## 2.9 Reason 9:

2.9.1 *"The development fails to demonstrate how it would ensure the safety of all buildings users in relation to fire, ..."*

2.9.2 See Applicant's Planning Statement Section 8.32.

## 3 Local Growth, Design Code, Densities & Setting assessment.

3.1 The Croydon Local Plan (2018) and the **Revised Draft Croydon Local Plan** do not provide any guidance on the London Plan **Policy D3 Design-Led Approach**.

3.1.1 The current Croydon Local Plan (2018) '**Growth**' Policies, as defined in Table 6.4, DM10.1 to DM10.11 or DM34 to DM49 and DM36 to DM49 '*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*' or '*Public Transport Accessibility*' 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.

3.1.2 The Revised draft Local Plan includes "**Moderate**" and "**Gentle**" intensification but again gives no guidance on the magnitude of these abstract descriptions.

3.1.3 These Policies are abstract objectives with no meaningful assessment.

### 3.2 London Plan Policy D3 States:

**"A** **'All'** development **must** make the best use of land by following a **Design-Led Approach** that **optimises the "capacity" of sites**, including site allocations. Optimising '**site capacity**' means ensuring that development is of the most appropriate form and land use **for the site**. The **design-led approach** requires **consideration** of design options to determine the most appropriate form of development that responds to a **site's** context and '**capacity for growth**', and existing and planned supporting '**infrastructure capacity**' (as set out in **Policy D2 Infrastructure requirements for sustainable densities**<sup>1</sup>), and that best delivers the requirements set out in **Part D**."

#### Policy D3 Para 3.3.2

**"A design-led approach** to optimising **site capacity** should be based on an **"evaluation"**<sup>2</sup> of the **site's attributes**, its surrounding context and its **capacity for growth** to **determine the appropriate form of development for that site**."

#### Policy D3 Para 3.3.4

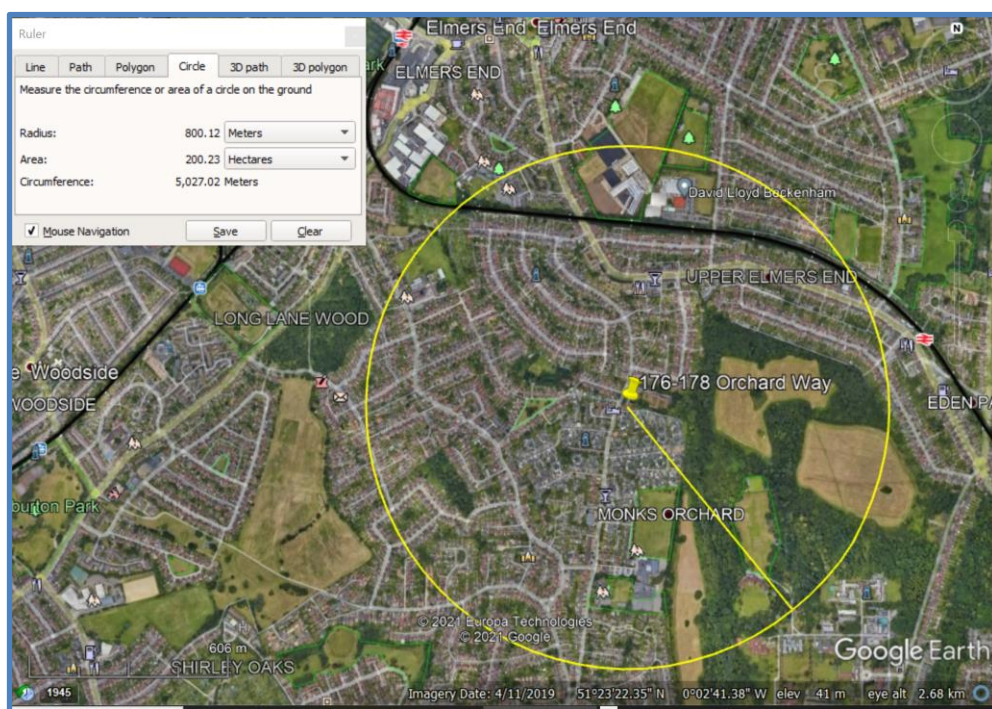
**"Designating appropriate development capacities through site allocations enables boroughs to proactively **optimise the capacity** of strategic sites through a consultative **design-led** approach that allows for meaningful**

<sup>1</sup> [https://www.london.gov.uk/sites/default/files/the\\_london\\_plan\\_2021.pdf](https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf)

<sup>2</sup> Definition of "**evaluation**": The making of a judgement about the **amount, number, or value** of something.

*engagement and collaboration with **local communities**, organisations and businesses.”*

- 3.2.1 The Applicant's Planning Statement at paragraph 6.3 quotes the **London Plan Policy D3 “Design-Led Approach”** but the applicant's proposal does **NOT** provide any evidence of actually meeting **London Plan Policy D3** with respect to the **“Design-Led Approach”** or optimising the development within the **“Site Capacity”**. This should have been a topic discussed during the **Pre-Application Meeting Ref:21/00548/PRE** (July 2021) as the new London Plan was published in **March 2021**. **None of these London Plan Policy D3 requirements have been considered or met.**
- 3.2.2 The implication of **Para 4.2.4** is that **“Incremental Intensification”** is **“inappropriate”** at **PTAL levels** below **3** and at distances greater than **800m** from either **train/tram Stations** or **District Centres**.
- 3.2.3 The locality of the proposed development is **Outer-Suburban** or **Suburban<sup>3</sup>**, and **176 Orchard Way** is at **PTAL Zero** and **178 Orchard Way** is at **PTAL 1b** (TfL WebCAT). Thus, below **PTAL 3**. The location is also greater than **800m** from any **tram** or **train Station**, the nearest of which is **Eden Park Rail Station** (greater than 800m from the site) and greater than 800m from a District Centre. The Shirley Centre is defined as a Local Centre in the Croydon Local Plan which is NOT a District Centre.



**Google Image showing 800m line of sight radius from the proposed does not include any Tram/Train Station or District Centre redevelopment site.**

<sup>3</sup>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1009793/NMDC\\_Part\\_1\\_The\\_Coding\\_Process.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1009793/NMDC_Part_1_The_Coding_Process.pdf) (see Part 1 Coding Process, Section 2B, Page 14).

### 3.3 The NPPF.

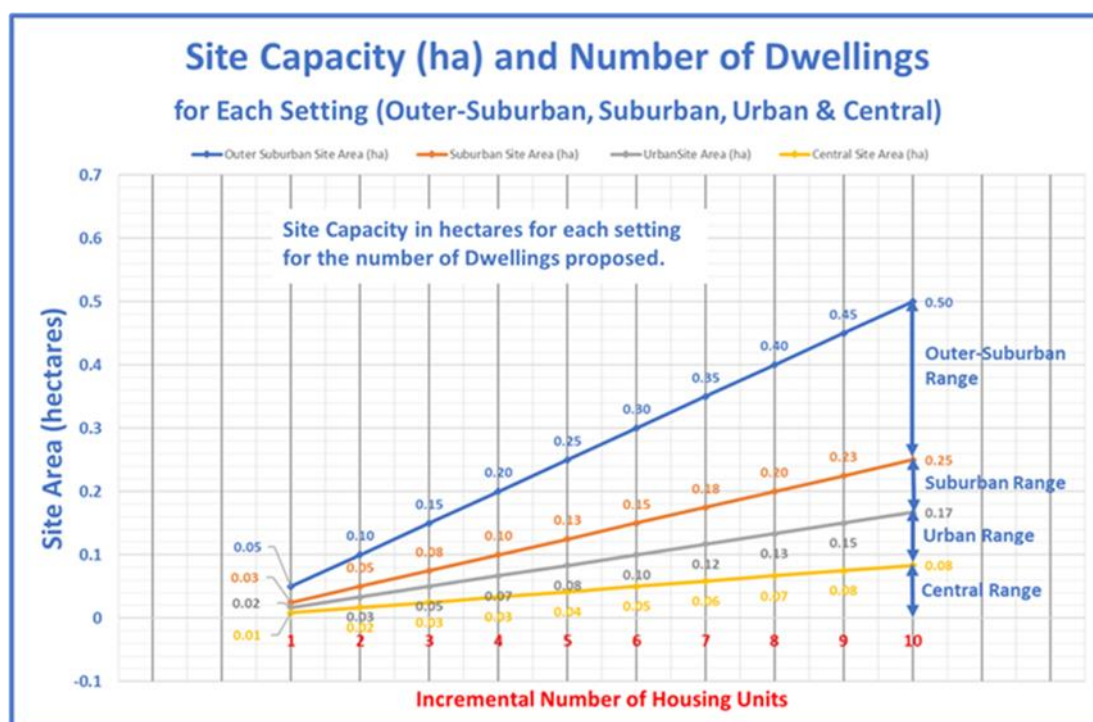
3.3.1 The NPPF para 129 states:

3.3.2 *"129. Design guides and codes can be prepared at an area-wide, neighbourhood or site-specific scale, and to carry weight in decision-making should be produced either as part of a plan or as supplementary planning documents. Landowners and developers may contribute to these exercises, but may also choose to prepare design codes in support of a planning application for sites they wish to develop. Whoever prepares them, all guides and codes should be based on effective community engagement and reflect local aspirations for the development of their area, taking into account the guidance contained in the National Design Guide and the National Model Design Code.*

3.3.3 *These national documents should be used to guide decisions on applications in the absence of locally produced design guides or design codes."*

### 3.4 The LUHC National Model Design Code & Guidance<sup>4</sup> Pts 1 & 2.

3.4.1 The 'Settings', 'Outer Suburban', 'Suburban', 'Urban' and 'Central' are defined in the **National Model Design Code** Part 1 The Coding Process, Section 2B Coding Plan, Figure 10 Page 14. Para 16 states: This document should be used as a basis for the production of design codes and guides by local planning authorities. It contains information that should be readily available to the local authority and is intended to be applied flexibly according to local circumstances as not all characteristics and design parameters may be relevant. The **National Model Design Code** Parameters are shown in Graphical form below



**Graphical Illustration of Site Area Capacities (ha) at each Setting, Outer-Suburban, Suburban, Urban and Central for 1 to 10 Units.**

<sup>4</sup> <https://www.gov.uk/government/publications/national-model-design-code>



- 3.4.4 The Tabular form provides the very relevant ranges of Site Capacities (hectares) in terms of the number of dwellings and Site Area capacity (ha) for each of the 'Settings' – 'Outer-Suburban', 'Suburban', 'Urban' and 'Central' as defined by the Department of LUHC National Model Design Code & Guidance Parts 1 & 2<sup>3</sup>.

Units (Dwellings)	1	2	3	4	5	6	7	8	9	10
Outer Suburban (max Site Area ha)	0.05	0.10	0.15	0.20	0.25	0.30	0.35	0.40	0.45	0.50
Outer Suburban (min Site Area ha)	0.03	0.05	0.08	0.10	0.13	0.15	0.18	0.20	0.23	0.25
Suburban (max Site Area ha)	0.03	0.05	0.08	0.10	0.13	0.15	0.18	0.20	0.23	0.25
Suburban (min Site Area ha)	0.02	0.03	0.05	0.07	0.08	0.10	0.12	0.13	0.15	0.17
Urban (max Site Area ha)	0.02	0.03	0.05	0.07	0.08	0.10	0.12	0.13	0.15	0.17
Urban (min Site Area ha)	0.01	0.02	0.03	0.03	0.04	0.05	0.06	0.07	0.08	0.08
Central (max Site Area ha)	0.01	0.02	0.03	0.03	0.04	0.05	0.06	0.07	0.08	0.08

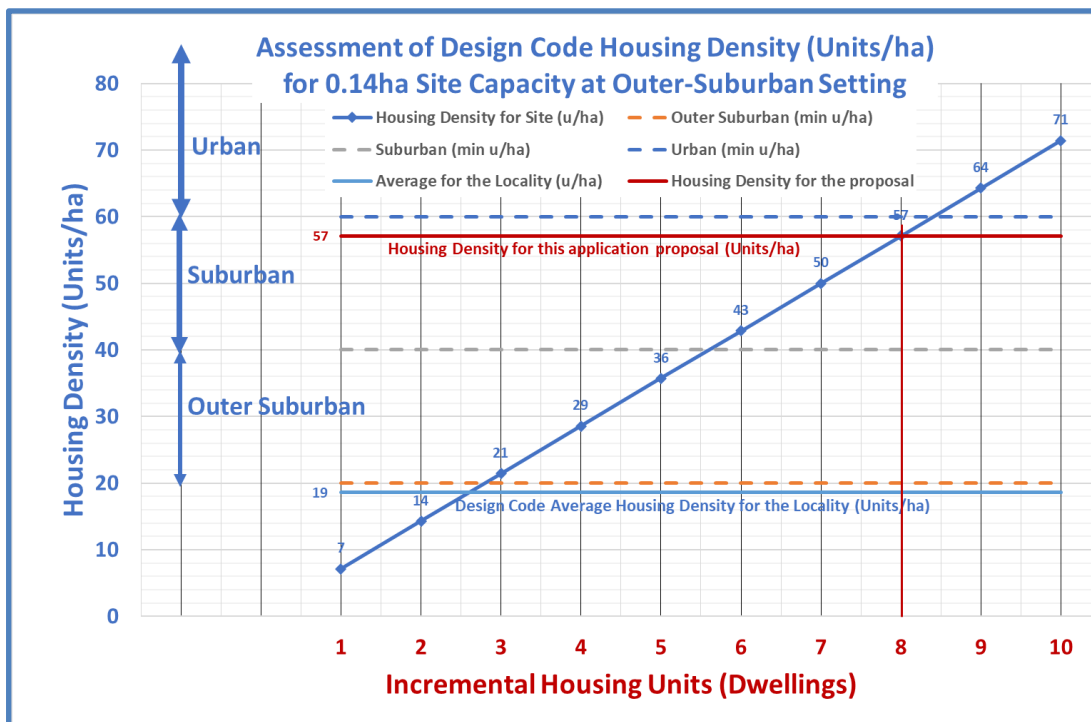
**Table of max and min Site Capacities (in hectares) at each Design Code Setting**

- 3.4.5 This Table shows the **Design Code Housing Density** for each Local Area based upon location data compared to the proposal's **Housing Density**.

Design Code Area	Area (ha)	Population	Dwellings	Housing Density (Units/ha)	Design Code Housing Density	Setting (as defined by the National Model Design Code)	Residential Density bs/ha
Shirley North Ward	327.9	15666	6555	19.99	20 to 40 U/ha	< Outer Suburban	47.78
Shirley South Ward	387.3	14147	5919	15.28	20 to 40 U/ha	< Outer Suburban	36.53
Shirley	715.2	29814	12474	17.44	20 to 40 U/ha	< Outer Suburban	41.69
MORA Area	178.26	9283	3884	21.79	20 to 40 U/ha	Outer Suburban	52.07
Average for the Locality	402.17	17227	7208.15	18.63	20 to 40 U/ha	< Outer Suburban	42.84
Application Ref: 21/06038/FUL	0.14	40	8	57.14	40 to 60 U/ha	suburban	285.71
Percentage above average	(This cannot be considered a moderate or gentle incremental increase)			206.79%	This clearly is NOT Moderate or Gentle Intensification!		566.98%

#### **Detailed Assessment of Housing Density Design Codes for Local Areas identifying Local Settings.**

- 3.4.6 Proposal's Site Capacity of 0.14ha at Outer- Suburban Setting.



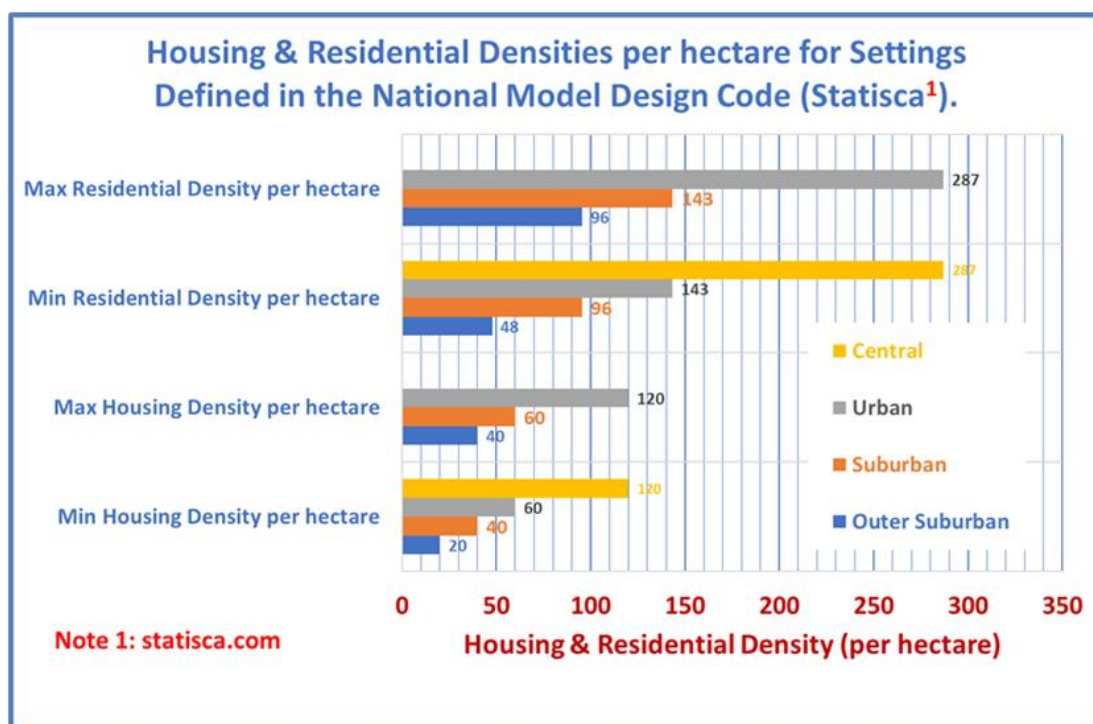
**Design Code Housing Density for 176-178 Orchard Way compared to Local Average Assessments using the National Model Design Code.**



- 3.4.7 As shown above, the housing densities for the areas listed, where data is available, are all **Less than or within** the **LUHC National Model Design Code Settings** for **Outer Suburban**. Based on this assessment, the proposed development exceeds the **Average Housing Design Code Density** of **18.63 Units/ha** (Outer Suburban Setting) to a value of **57.14 Units/ha** (Suburban Setting) an increase of **206.79%** which is **NOT** considered a **proportionate** or a reasonable interpretation of **“Moderate”** or **“Gentle”** increase in **“Growth”** in a locality which by definition is **inappropriate** for **“incremental Intensification”** (London Plan Policy H2 para 4.2.4).
- 3.4.8 As indicated in **NPPF para 129**, in the **“absence”** of locally produced **Design Guides** or **Design Codes** in the current **Croydon Local Plan (2018)** or the **Draft Revised Local Plan**, the **‘Settings’** and **‘Design Codes’** defined in the **National Documents** should be used to **“guide decisions on applications”**.

### 3.5 Residential Densities

- 3.5.1 It is ‘people’ who require supporting infrastructure, NOT Dwellings, so we need to establish equivalent **Residential Densities** ranges for the **‘Settings’**. This can be achieved using the Office of National Statistics (ONS) data and Statista<sup>5</sup> data. In 2020, the average number of people per household in the United Kingdom was **2.39** compared with 2.37 in the previous year. We can use this factor to convert equivalent Units/ha to Bedspaces/ha as shown in the following Graphical illustration.



#### Housing Densities and equivalent Residential Densities for each of the National Model Design Code Settings

- 3.5.2 Using this data, and TfL Connectivity data (assumed linear over the range), we can plot and illustrate the required **Settings** for this proposed **Residential Density** in **hr/ha** and **bedspaces/hectare** which gives an estimated relationship between **Residential Density** and required Public Transport connectivity, **PTAL**.

<sup>5</sup> <https://www.statista.com/statistics/295551/average-household-size-in-the-uk/>

- 3.5.3 Assuming the Distribution of Residential Density is linear over the PTAL ranges for the Setting the Residential Density would follow the linear function:

$$y = mx + c$$

Where  $y$  = Density,  $m = \delta y / \delta x$ ,  $x$  = PTAL, and  $c = 0$  when  $x = y$

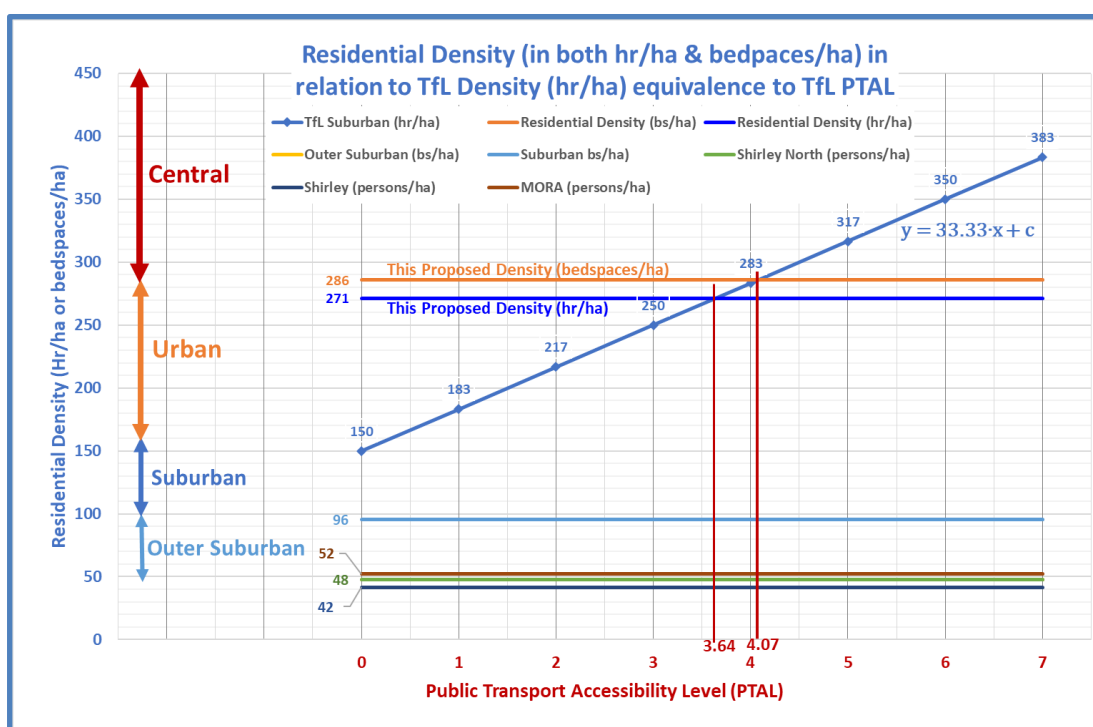
Therefore, for a Residential Density of 285.71 bedspaces per hectare the PTAL required would be given by:

$$285.71 = ((350 - 150) / 6) \cdot x + 150 \text{ therefore } x = \text{PTAL} = 4.072$$

And for a Residential Density of 271.43 hr/ha, the PTAL required would be given by:

$$271.43 = ((350 - 150) / 6) \cdot x + 150 \text{ therefore PTAL} = 3.643$$

This is Graphically shown as:



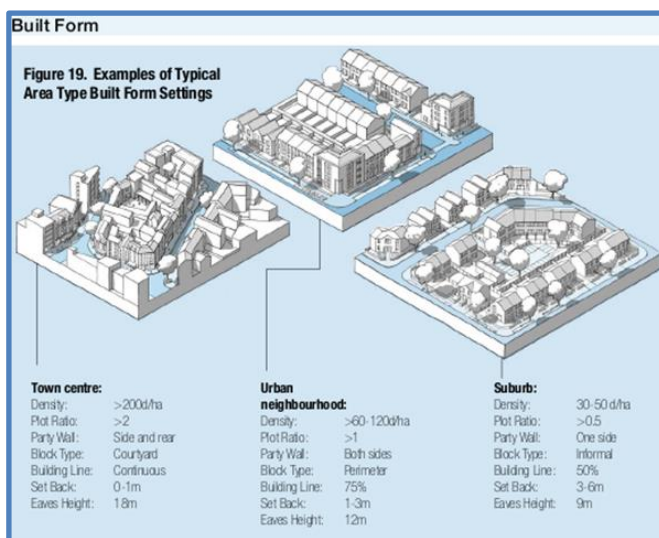
**Graphical illustration of required PTAL for the proposal's Residential Density whether measured in hr/ha or bedspaces/ha when the Site PTAL is ≈1.**

- 3.5.4 This analysis clearly indicates the assessment of **Residential Density** of the proposal exceeds the available **Public Transport Accessibility Level (PTAL)** required for the proposal which would remain so at least up to 2031, which is clearly unsustainable.
- 3.5.5 The overall assessment is that this proposal is a significant over development of the **Site Capacity** for the Design Code "**Setting**" of "**Outer Suburban**" both in terms of Housing and Residential Densities as assess of the **NPPF National Model Design Code and Guidance**. If the Case Officer disagrees with this analysis based upon the NPPF guidance, we would respectfully request that a detailed justification is provided in the recommendation Report for determination to the Delegate or Planning Committee. We are convinced that the proposal significantly exceeds the available **Site capacity**

### 3.6 Application Floor Area Ratio (FAR) Design Code.

3.6.1 The Floor Area Ratio is determined by **Gross Internal Area ÷ Site Area** (both in the same units of measure. The recommendation for a Suburban Setting is that the Floor Ratio Design Code should be **LESS THAN 0.5**.

3.6.2 Therefore, for this application, the floor Area Ratio is **920.88/1400** in **m<sup>2</sup>** which is 0.66 i.e., greater than 0.5 by 0.16 i.e., a **32%** increase above the maximum **Design Code** recommended. This is another indication of exceeding the available '**Site Capacity**'.



## 3 Minimum Space Standards

3.1 The London Plan defines Minimum Space Standards at Table 3.1. The proposal meets and exceeds most minimum standards but fails to provide dimension of In-Built storage and to confirm that any In-Built storage meets the minimum space standards of table 3.1. The requirements are listed in the list of parameters earlier in this submission but the offered In-Built Storage is "Not Stated".

## 4 Targets

### 4.1 The Revised Local Plan (6<sup>th</sup> December 2021)

4.1.1 **Policy SP1.0C States:** *"There are residential areas where the characteristics and infrastructure provision have led to the identification of potential for sustainable housing growth and renewal.*

*b. **Moderate Intensification** – are areas where density will be increased, whilst respecting existing character, in locations where access to local transport and services is good.*

*c. **Evolution and gentle densification** will be supported across all other residential areas.*

4.1.2 The Revised Local Plan indicates the 20-year target (2019-2039) to be **278** Units for the **Shirley "Place"**.

4.1.3 Planning Officers and Committee members quote the need for housing as a prime objective of planning approvals even when non-compliant to planning Policies.

4.1.4 The **Revised Croydon Plan** has revised target for **"Places"** over the period **2019 to 2039** and at Table 3.1 (page 31) states the target for the Shirley **"Place"** to be 278 dwellings. This equates to an average year-on-year for the Shirley **"Place"** of **13.9 dwellings/year**.

- 4.1.5 The recent level of in-fill and re-developments in the **MORA Area** are listed in the following Tables.

Approvals					
Year 2019					
Location	Reference	Approval Date	Existing Dwellings	New Dwellings	Overall
20-22 The Glade	18/05928/FUL	01/02/2019	0	2	2
10-12 Woodmere Close	19/00051/FUL	27/02/2019	0	1	1
9a Orchard Rise	18/06070/FUL	21/03/2019	1	9	8
32 Woodmere Ave.	19/00783/FUL	20/06/2019	1	7	6
18a Fairhaven Ave.	19/01761/FUL	20/06/2019	1	9	8
17 Orchard Ave.	19/00131/FUL	06/11/2019	1	8	7
56 Woodmere Ave.	19/01352/FUL	24/10/2019	1	9	8
14-16 Woodmere Close	19/01484/FUL	23/10/2019	0	1	1
37 Woodmere Ave.	19/03064/FUL	26/09/2019	1	8	7
<b>Totals</b>			<b>6</b>	<b>54</b>	<b>48</b>
Year 2020					
Location	Reference	Approval Date	Existing Dwellings	New Dwellings	Overall
151 Wickham Road	19/04149/FUL	18/03/2020	0	5	5
16-18 Ash Tree Close	19/04705/FUL	27/02/2020	2	8	6
174 The Glade	20/01968/FUL	27/07/2020	1	2	1
116 Orchard way	20/05960/FUL	12/05/2020	1	4	3
195 Shirley Road	19/06-37/FUL	22/09/2020	1	9	8
<b>Totals</b>			<b>5</b>	<b>28</b>	<b>23</b>
Year 2021					
Location	Reference	Approval Date	Existing Dwellings	New Dwellings	Overall
116 Orchard Way	20/05960/FUL	12/05/2021	1	4	3
176-178 Orchard Way	21/01635/FUL	Pending Appeal	2	8	6
81 The Glade	21/00108/FUL	Pending Appeal	1	9	8
34 Woodmere Ave.	21/02212/FUL	Waiting	1	6	5
21 Woodmere Gardens	21/03702/FUL	Waiting	1	9	8
75 Shirley Ave.	21/02622/FUL	Waiting	1	4	3
13 Gladeside	21/03518/FUL	Waiting	1	6	5
27 Orchard Rise	21/04094/FUL	Waiting	1	4	3
46 The Glade	21/05741/FUL	Waiting	1	9	8
Land R/O Firsby Ave.	21/06036/FUL	Waiting	0	9	9
<b>Totals</b>			<b>10</b>	<b>68</b>	<b>58</b>

- 4.1.6 However, as shown, the **MORA Area** is **178.26ha** which is less than the **Shirley North Ward Area** of **327.9ha** or the **Shirley South Ward** of **387.3ha** or the combined **Wards of Shirley** at **715.2ha**. Which is smaller than the undefined area of the **Shirley "Place."**
- 4.1.7 Therefore the rate of increase in number of dwellings in the **MORA Area** is significantly exceeding the Target as redefined in the **Revised Local Plan** of **278 Units** over **20 years** to **860 units**, a **209.353%** increase.



- 4.1.8 Tabular form showing the probable forecast at 2039 if the rate of in-fill and redevelopment proceeds at the current average over the next 20 years.

MORA Area re-developments			
Year	Existing Dwellings	New Dwellings	Overall
2019	6	54	48
2020	5	28	23
2021	10	68	58
<b>Total</b>	<b>21</b>	<b>150</b>	<b>129</b>
Average per year	7.00	50.00	43.00
Shirley Place Target 2019 -2039		278	
Shirley Place Average per year		13.9	
At the MORA rate of 43 Units/Year over 20 yr period =			860
MORA Area	Area (ha)	Population	Dwellings (Units)
MORA Area 2021	178.26	9283	3884
Target	178.26	9561	4162
MORA Area 2039 actual	178.26	11338	4744

**2019-2039 Forecast at current average rate of increase.**

- 4.1.9 This rate is considered unsustainable with **NO** possibility of increase in supporting infrastructure or public transport accessibility or other public service support infrastructure.

**4.2 Development Management**

- 4.2.1 The recommended methodology to manage increased Housing Units within the acceptable Targets and to maintain the local character is to enforce those development proposals to meet all the parameters of the Design Codes for the area and to implement the "Design-Led Approach" and "Site Capacity" requirements on the proposed developments, a fundamental objective of the Job Description of **"Development Management"**.

**5 Conclusions and Recommendations**

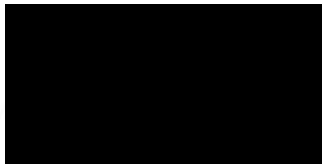
- 5.1 We have clearly demonstrated in the foregoing submission, that the Applicant has not made sufficient modifications to the refused proposal to overcome the reasons 1 to 9 of the original refusal.
- 5.2 The proposal fails to meet the Local Design Code parameters as defined in the National Model Design Code and Guidance.
- 5.3 The proposal fails to meet the Housing Density Design Code for the Setting.
- 5.4 The proposal has a Residential Density which would require Public Transport Accessibility (PTAL) at between 3.64 and 4.0 when the available Accessibility (PTAL) is  $\approx 1$  with no prospect of improvement prior to 2031.
- 5.5 There is ample evidence of overdevelopment of this proposal at this "Setting" for the "Site Capacity" as shown by the modification of Unit Boundaries and Curtilages, to squeeze the parking within the site area.



- 5.6 It is totally unacceptable for future occupants of Unit 4 to have Unit 5's Vehicle parked on what would normally be considered Unit 4's Forecourt, directly in front of Unit 4's Lounge Window.
- 5.7 Further evidence of over development is shown by the failure to meet the required Floor Area Ratio of <0.5 with the site area for a Suburban Setting as defined in the National Model Design Code and Guide. The Floor Area Ratio offered is 0.66.
- 5.8 In conclusion, we are of the strong opinion that this second application should similarly be refused.

Kind Regards

Derek



**Derek C. Ritson I. Eng. M.I.E.T.**  
**MORA – Planning**  
Email: [planning@mo-ra.co](mailto:planning@mo-ra.co)



**Sony Nair**  
**Chairman MORA**  
**Monks Orchard Residents' Association.**  
Email: [chairman@mo-ra.co](mailto:chairman@mo-ra.co)

Cc:

Sarah Jones MP  
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 Executive Committee, Local affected Residents & Interested Parties