

Sara Burke - Case Officer
The Planning Inspectorate, Room 3/10
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**Monks Orchard Residents' Association
Planning**

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20th May 2022

Appeal under Section 78:

Location: 34 Woodmere Avenue, Croydon, CR0 7PB, ,
 Application Number: 21/02212/FUL
 DoE Appeal ref: APP/L5240/W/22/3293208
 Details of Application: Demolition of the existing property and the erection of two storey terraced houses with accommodation in the roof space, comprising six dwellings with six off-street car parking spaces.
 Appellant's name: Mr Rob Allen
 Appeal start date: 4 May 2022
 Comments due: 08 Jun 2022

Dear Ms Burke – Case Officer

Please accept this representation from the Monks Orchard Residents' Association as a request for the Appeal to be **Dismissed** on the grounds as listed in our submission as follows. We fully support the Local Planning Authority (LPA) Case Officer's Report for a refusal and provide the following analysis to support the Delegate Committee decision for a refusal.

We have structured this representation on the Appellant's "Grounds of Appeal" at Item 11 based upon an assessment on the LPA Reasons for Refusal.

Proposed Development Parameters:

34 Woodmere Avenue - Application Ref: 21/02212/FUL														
	Dwellings	6	Units Residential Density			379.21	hr/ha	Floor Area Ratio (FAR)			0.90			
	Site Area	712	sq.m. Residential Density			421.35	bs/ha	FAR Require			<0.5	units/ha	PTAL (2011)	
	Site Area	0.0712	ha Housing Density			84.27	unit/ha	Average Habitable			4.50	hr/Unit	PTAL (2031)	
	Floor	Bedrooms	Bed Spaces	Habitable Rooms	GIA Offered	GIA Required	Built-In Storage offerd	built-in storage required	Private Open Space offered (Rear Garden)	Private Open Space offered (Front Garden)	Private Open Space (Required)	Car Parking Spaces	Probable Number of Adults	Probable Number of Children
Unit 1	Ground	0	0	1.5	106.5	99	Not Stated	2.5	41	28.5	8	1	2	3
	First	2	4	2										
	Second	1	1	1										
Unit 2	Ground	0	0	2	106.5	99	Not Stated	2.5	22	29	8	1	2	3
	First	2	4	2										
	Second	1	1	1										
Unit 3	Ground	0	0	2	106.5	99	Not Stated	2.5	35.8	32	8	1	2	3
	First	2	4	2										
	Second	1	1	1										
Unit 4	Ground	0	0	2	106.5	99	Not Stated	2.5	35.7	27.5	8	1	2	3
	First	2	4	2										
	Second	1	1	1										
Unit 5	Ground	0	0	2	106.5	99	Not Stated	2.5	21.5	28.3	8	1	2	3
	First	2	4	2										
	Second	1	1	1										
Unit 6	Ground	0	0	2	106.5	99	Not Stated	2.5	37	26	8	1	2	3
	First	2	4	2										
	Second	1	1	1										
Totals		18	30	27	639	594	0	15	193	171	48	6	12	18
Average/Dwelling		3.00	5.00	4.50	106.50	99.00	0.00	2.50	32.17	28.55	8.00	1.00	2.00	3.00

The above summary Table of the offered development lists all the parameters supporting the following reasons for a refusal by the LPA.

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1 Reason for Refusal 1

1.1 Refusal 1:

"The proposed development, by reason of scale, massing, poor elevational composition, materials and detailing would result in an unsightly, dominant and imposing form of development which would fail to integrate successfully in townscape terms or make a positive contribution to the setting of the local character and immediate surroundings contrary to Policies D4, D8 of the London Plan 2021 and SP2, SP4, DM10 of the Croydon Local Plan 2018 and the Council's Supplementary Planning Document Suburban Design Guide (SDG) 2019."

1.2 Scale, Massing Dominant & Local Character.

1.2.1 The proposed development is for two blocks of three terraced Units each of three storeys fronting Pipers Gardens when Pipers Gardens is a Cul-de-Sac of predominantly detached single unit bungalows as shown below. The proposed development would be overbearing to these existing and retained bungalows opposite and to the west of the proposed development as depicted in the LPA Reason 1 for refusal.



Detached Bungalows on the west side of Pipers Gardens opposite the proposed development site.

1.2.2 The East side of Pipers Gardens currently has bungalows, but the redevelopment proposes two blocks of three terraced Units of three storeys height extremely close to the remaining adjacent bungalow at #5 Pipers Gardens (see Below).



Google Earth Image of proposed Site at 34 Woodmere Avenue (fronting Pipers Gardens) Note: 32 Woodmere Avenue is erroneously labeled 34 by Google Earth.

- 1.2.3 The West facing Elevation onto Pipers Gardens shows close proximity and overbearing nature of the proposed development toward the adjacent bungalow at #5 Pipers Gardens.



- 1.2.4 This proximity cannot be scaled off the supplied plans as loaded from the on-line Register as there is no "Bar Scale" provided (as required by the LPA validation checklist) on the Plans, but it can be shown to **fail the SPD2 Para 2.11 45-Degree (Vertical) Rule)**

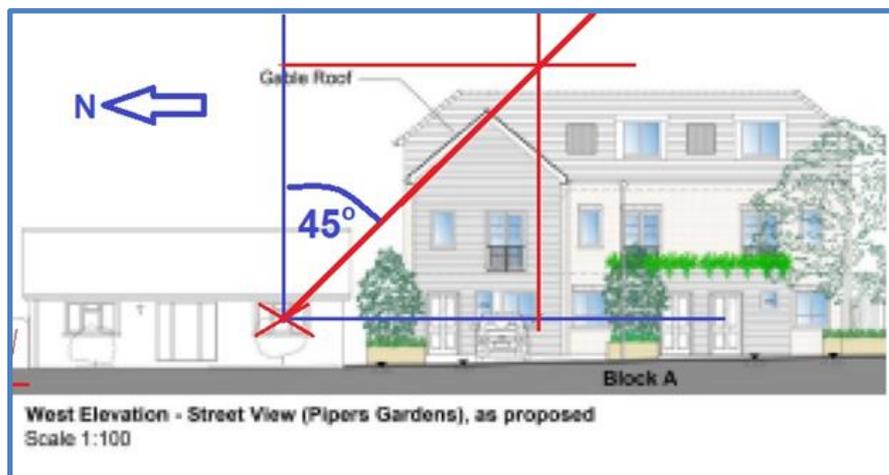


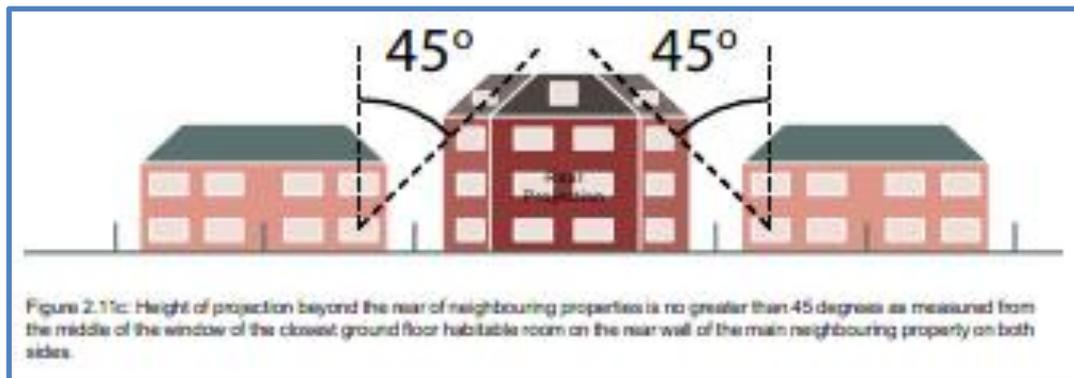
Illustration of SPD2 45-Degree (Vertical) Rule which is detrimental to the Amenity of adjacent dwelling

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1.2.5 SPD2 Para 2.11.1 States:

“Where a development projects beyond a rear building line, the height and footprint of the projection does not necessarily need to be lower or narrower, provided the guidance on relationship to boundaries (Refer to Section 2.16) and overlooking (Refer to Section 2.9) is followed. It should be demonstrated that there would be no unreasonable impact on neighbouring amenity. Where it is necessary to mitigate impact on neighbouring amenity, the projection beyond the rear building line **may need to step down in height and width, to meet the guidance below:**

- It follows the 45 degrees rule demonstrated in Figure 2.11b and 2.11c. In exceptional circumstances, where orientation, topography, landscaping, and neighbouring land uses allow, there may be scope for a depth beyond 45 degrees.
- The flank wall is designed to minimise visual intrusion where visible from neighbouring properties.”



1.2.6 The Applicant has NOT provided rear elevations and the relationship with the adjacent dwelling to the north as required in the validation checklist. We have used the Front Elevation in to give an assessment. The proposed development clearly fails to comply with SPD2 para 2.11c 45-degree rule requirement for the 45° projection from 5 Pipers Gardens to be clear of the proposed adjacent development to avoid unreasonable impact on 5 Pipers Gardens amenity, especially as the proposed development is to the south of 5 Pipers Gardens.

1.3 National Model Design Code & Guidance¹

To support assessment of the appropriateness of the development, we refer to the National Model Design Code & Guidance referenced from NPPF para 129.

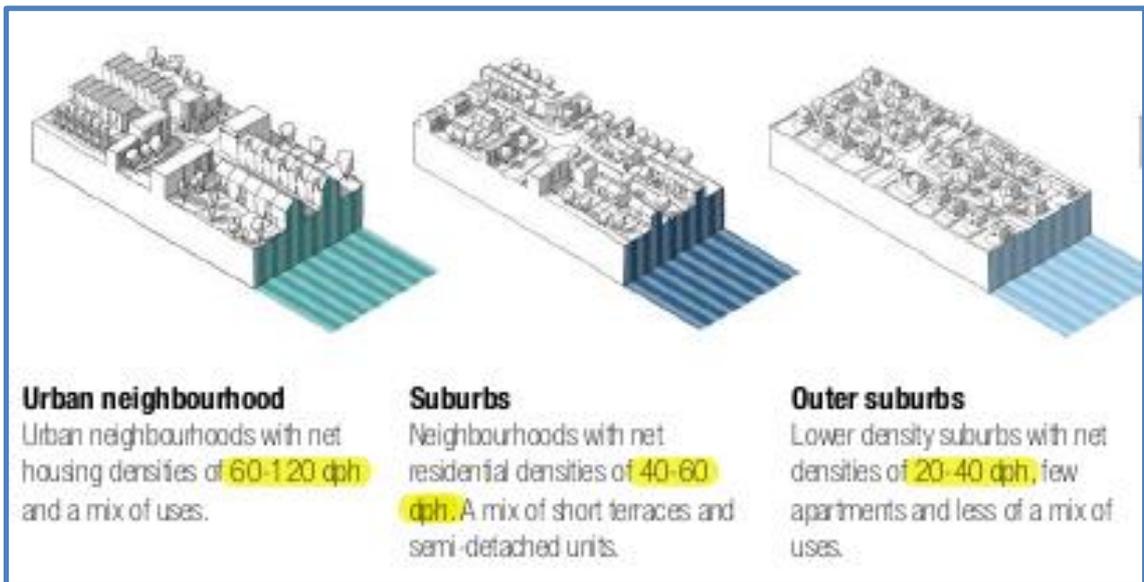
1.3.1 NPPF para 129 states:

“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

¹ <https://www.gov.uk/government/publications/national-model-design-code>

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

1.3.2 As neither the Croydon Local Plan (2018), the Revised Croydon Plan (2021) nor the London Plan (March 2021) provide Design Codes assessment or Guidance, the only guidance appropriate is defined in the National Model Design Code and Guidance referenced from NPPF para 129.

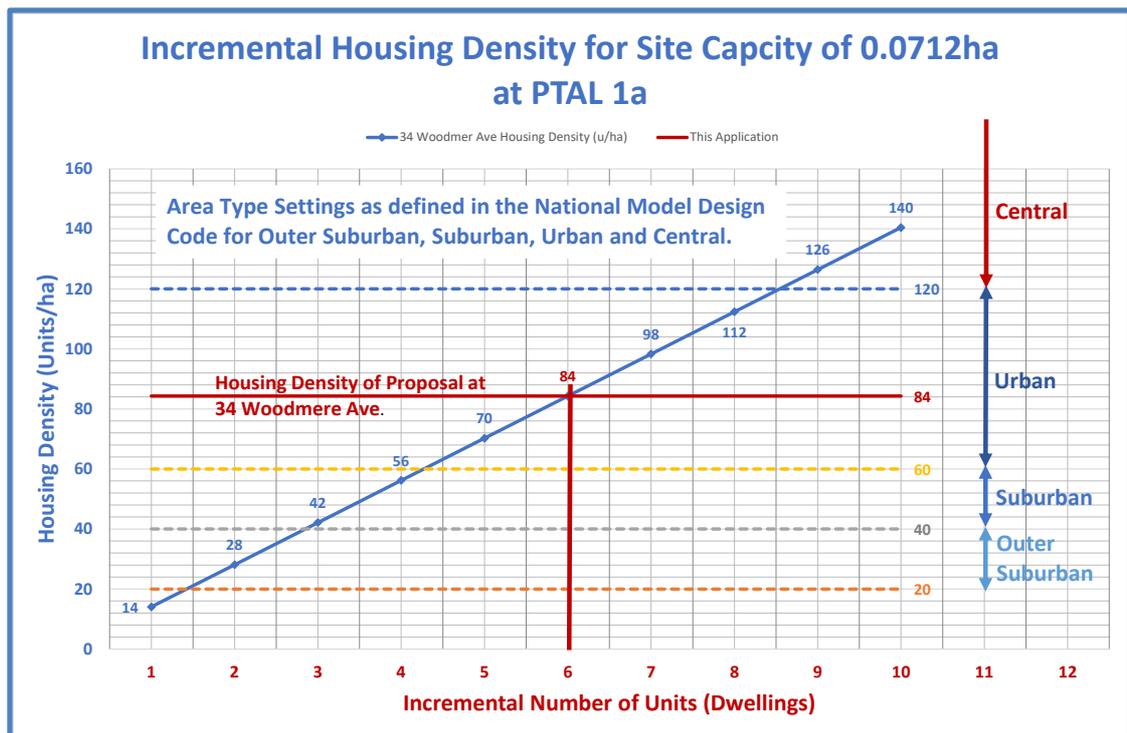


The Area Types Settings for Design Code Housing Densities are given in Part 1 Section 2B Coding, Illustration Figure 10 page 14.

1.3.3 Local Area Type Design Code Housing Densities assessment.

Location	Area (ha)	Population	Dwellings (Units)	Residential Density (bs/ha)	Housing Density (Units/ha)	"Setting" for Design Code Density
Shirley North Ward	327.90	15,666	6,555	47.78	19.99	<Outer Suburban
Shirley South Ward	387.30	14,147	5,919	36.53	15.28	<Outer Suburban
All Shirley	715.20	29,814	12,474	41.69	17.44	<Outer Suburban
MORA Area	178.26	9,283	3,884	52.07	21.79	Outer Suburban
Shirley "Place" ¹ (approx)	770.00	?	?	?	?	?
Average	475.73	17,227	7,208	44.52	18.63	<Outer Suburban
34 Woodmere Ave Proposed	0.07	30	6	421.35	84.27	Urban

1.3.4 The following graphical illustration is clear evidence that the proposal has a Design Code Housing Density at 84.27Units/ha which is roughly center of the Urban Area Type Density Setting Range when all assessments of the locality at the previous table indicates the various assessments of the locality show the Housing Density to be below or within the Outer Suburban Area type Setting as defined by the National Model Design and Guidance. This is further evidence of excessive Scale, Massing Dominant & Local Character as assessed by the LPA in support of a refusal.



The proposal National Model Design Code Housing Density at 34 Woodmere Avenue at site capacity of 0.0712ha equates to 84.27units/ha requiring a Design Code Area Type Setting in the Urban Range.

1.3.5 The National Model Design Code assessment of the proposed Housing Density of 6 Units on a Site Capacity of 0.0712ha requires the Area Type Setting to be Urban when all assessments show the locality to be “Outer-Suburban”. This is further evidence in support of the LPA refusal and clear evidence of the need to Dismiss this Appeal.

1.4 Intensification

1.4.1 The Revised Croydon Local Plan (December 2021) for consultation has declared Shirley is inappropriate for incremental intensification due to low PTAL and lack of infrastructure improvement proposals over the life of the Plan. It is understood that only “Gentle” intensification would be considered acceptable. However, there is NO definition of what “Gentle” intensification actually means numerically.

1.4.2 London Plan Para 4.2.4 States: *“Incremental intensification of existing residential areas within PTALs 3-6 or within 800m distance of a station² or town centre boundary³.”*

1.4.3 The London Plan at Policy H2 para 4.2.4 indicates “Incremental Intensification” is only appropriate at locations with supporting accessibility to Public Transport at PTAL level of 3 to 6 and within 800metres of a Train/Tram Station or District Centre” which infers Incremental Intensification is inappropriate at this proposed development location at 34 Woodmere Avenue. 34 Woodmere Avenue PTAL is at level 1a and is forecast to remain at 1a until at least 2031.

² Tube, rail, DLR or tram station

³ District, major, metropolitan and international town centres

1.5 Residential Densities

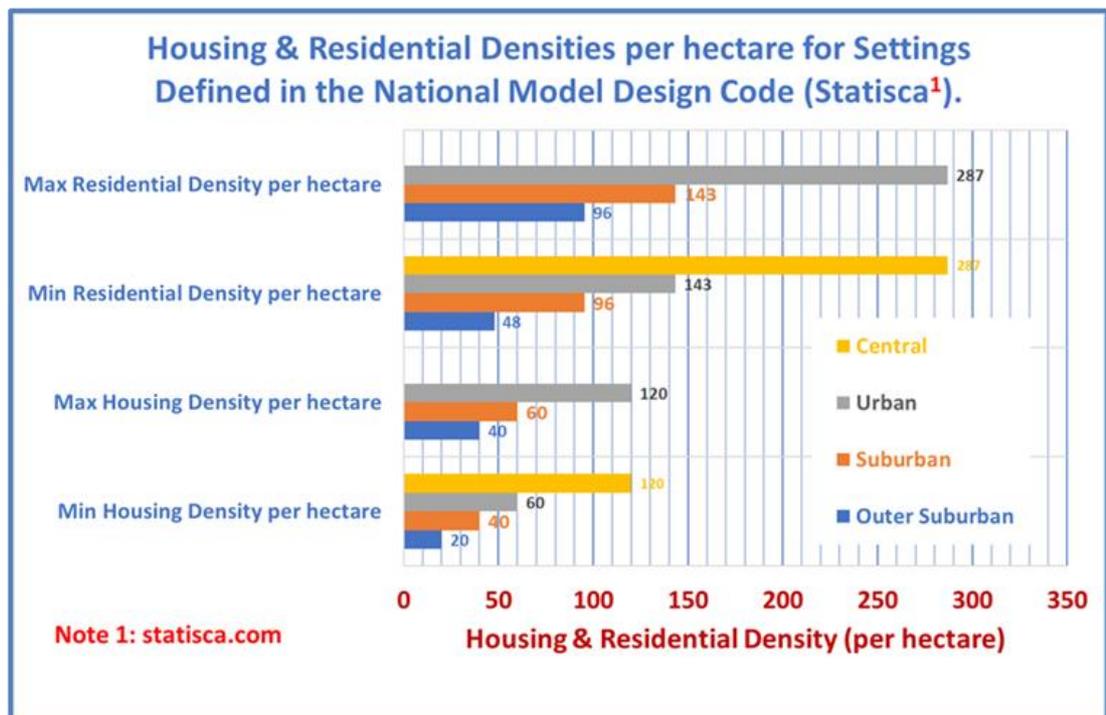
1.5.1 It is also people who require supporting infrastructure, **NOT** Dwellings, units, or habitable rooms, so we need to establish equivalent **Residential Density** ranges for the 'Settings'. This can be achieved using the Office of National Statistics (ONS) data and Statista™⁴ data. In 2020, the average number of persons per household in the United Kingdom was **2.39** compared with 2.37 in the previous year.

1.5.2 We can use this latest data as a National factor to convert the National equivalent **Units/ha** to **Bedspaces/ha** as shown in the following Table and Graphical illustration below. This is the only known factor for conversion from Units/ha to Bedspaces/hectare unless the Inspectorate Case Officer has other procedures to assess local Residential Density.

	Outer Suburban	Suburban	Urban	Central
Minimum Housing Density (Units/ha)	20	40	60	120
Maximum Housing Density (Units/ha)	40	60	120	
Minimum Residential Density (bs/ha)	47.8	95.6	143.4	286.8
Maximum Residential Density (bs/ha)	95.6	143.4	286.8	

Table showing Conversion from Housing Density (Units/ha) to Residential Density (bs/ha) using the National Average occupancy

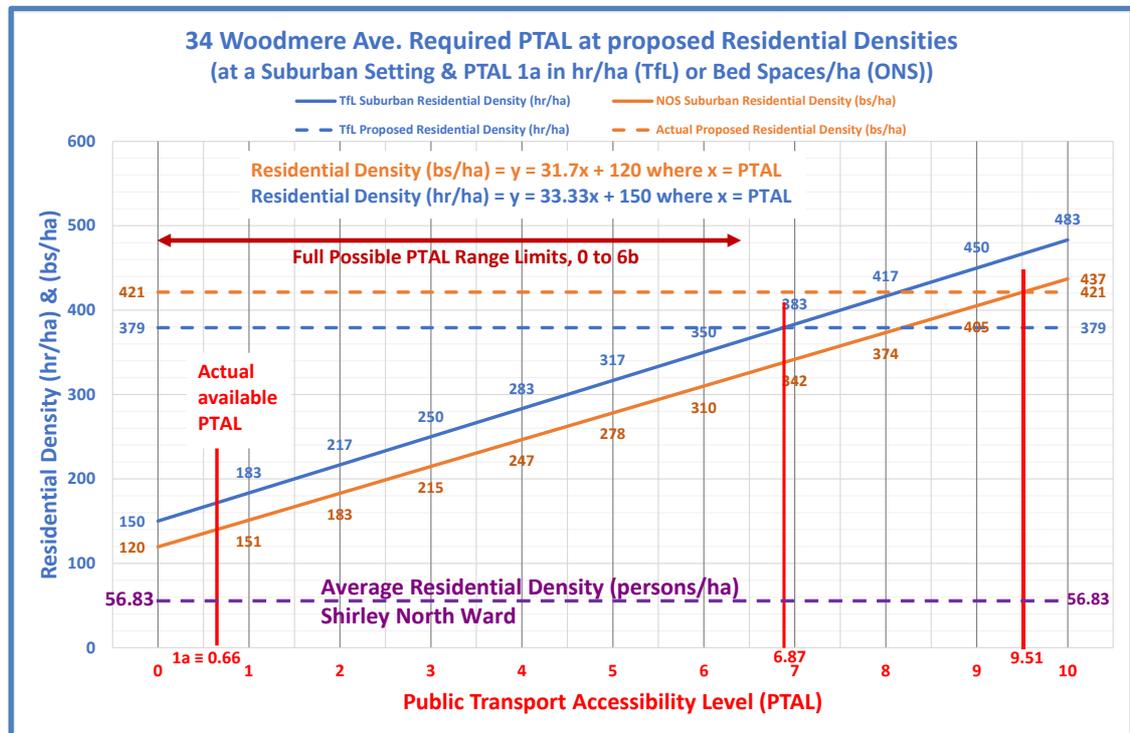
1.5.3



Graphical Illustration of equivalent Densities for Area Setting Types based upon ONS and Statista™ National Dwelling Occupancy factor

⁴ <https://www.statista.com/statistics/295551/average-household-size-in-the-uk/>

1.5.4 Residential Density PTAL requirement.



Graphical Illustration of Public Transport Accessibility for the proposed development Residential Density at PTAL 1a

- 1.5.5 The above graphical illustration, assuming linear incremental increase of PTAL for a Suburban Setting using TfL data, indicates a required PTAL of either **6.87** for Residential Density measured in hr/ha or a PTAL of **9.51** for a Residential Density measured in Bedspaces/ha, when the locality has a PTAL of 1a. Both assessments would require **PTAL** which are at least a maximum or outside the 0 to 6a TfL PTAL Range.
- 1.5.6 This is further clear evidence that the proposal exceeds the available Site Capacity for the Area Type Setting locality and the local supporting infrastructure including the Public Transport Accessibility and is therefore an overdevelopment for the locality. This supports the LPA refusal and is additional evidence to support a dismissal of this appeal.
- 1.5.7 The Site Capacity of 0.0712ha is insufficient to support 6 dwellings and a Residential Density of 421.35 bedspaces/ha in an Outer-Suburban Area Type Setting and a PTAL of 1a. The Outer-Suburban Setting at low PTALs should be tending toward the lower density in the range 20 to 40 units/ha and tend toward the higher density in the range 20 – 40 units/ha at higher PTALs.
- 1.5.8 These are all cumulative reasons for a dismissal of this appeal based upon the **National Model Design Code and Guidance** as published by the **Department for Levelling Up, Communities and Housing (DLUCH)** as referenced from the NPPF.

2 Reason for Refusal 2

2.1 Refusal 2

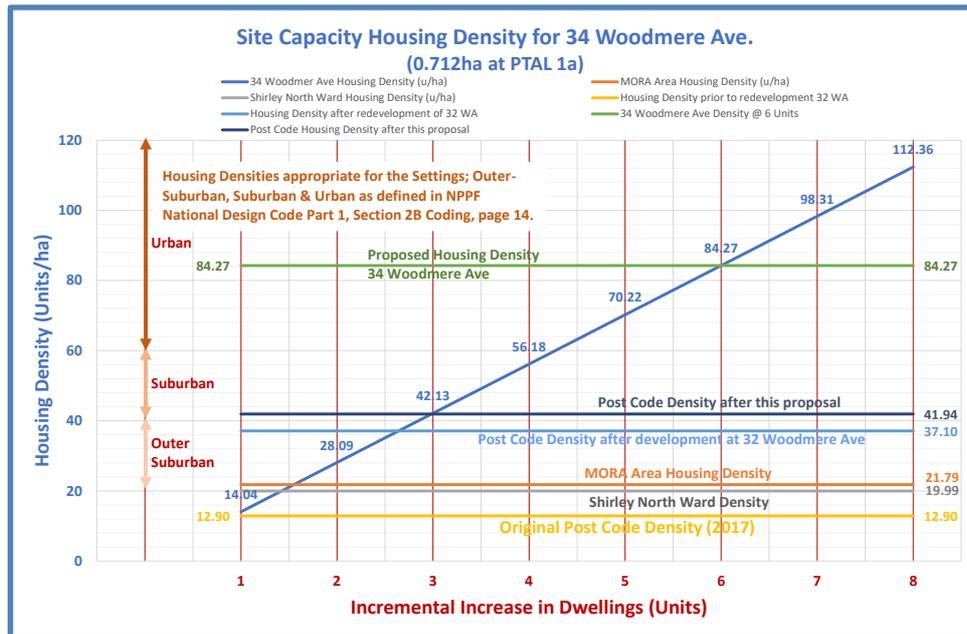
“The proposal by reason of its massing and proximity close to neighbouring properties in Pipers Garden and nos.30 and 32 Woodmere Avenue would result in an intrusive and imposing form of development leading to a loss of outlook for surrounding neighbours, overlooking of neighbouring garden of no.32 and would be contrary to policy DM10 of the Croydon Local Plan 2018, Policies D3 and D6 of the London Plan and the Suburban Design Guide SPD (April 2019).”

- 2.1.1 These are similar reasons as listed for Refusal reason 1 but reference the overbearing nature and closeness to the existing bungalows in Pipers Gardens.
- 2.1.2 The Planning Policies do NOT adequately cope with the cumulative effects of local developments on local character or whether the supporting infrastructure is adequate or sustainable. The local area has undergone significant redevelopment over recent years and local residents are concerned that supporting infrastructure has not been provided and that increases in development are unsustainable and are changing the character of the locality .



Local Area and Site Layout for 34 Woodmere Avenue

- 2.1.3 The following graphical illustration shows that prior to recent developments, the Area Type Setting **Post Code** for **34 Woodmere Avenue** Housing Density was **12.90units/ha**. However, the redevelopment of **32 Woodmere Avenue** had an individual housing density of **7 units** on a site area **0.06ha = 116.66 u/ha** and that increased the Post Code density to **37.10u/ha**. This lifted the Post Code area Density to the near maximum of the ‘**outer suburban**’ area type setting. The proposed development at **34 Woodmere Avenue** of housing density **6 units** on a site of **0.0712ha = 84.27 u/ha** would increase the same Post Code area design code to **41.94u/ha** which would then break into the lower range of the ‘**suburban**’ area type **Design Code** of **40units/ha**. Thus, the overall increase for the Post Code would be $(41.94-12.90)/12.90 = 2.251 \approx 225\%$ increase in **Housing Density** within the post code area CR0 7PB.



Uplift of Cumulative Developments on Area Type Setting Design Codes

2.2 Targets and Housing “Need”

2.2.1 We appreciate that there is a need for more housing. However, in order to service this need, it is probably tolerably acceptable to local effected residents, if the Targets are reasonable and are contained within acceptable limits. The Housing “need” for Boroughs has been defined by the GLA and these targets have been distributed by the LPA and allocated to the “Places of Croydon. The Shirley “Place” has a target (Table 3.1) of **278⁵** new dwellings over 20 years,

2.2.2 We raised a Freedom of Information (FOI) request **Ref: 4250621** on 31st January 2022. The analysis of the response is as follows:

2.2.3 The Shirley “**Place**” as defined in the Local Plan has an area of approximately **≈770 hectares** and comprises **Shirley North** and **Shirley South Wards** and therefore the FOI response suggests completions for **Shirley “Place”** can be calculated by adding the completion figures together for each **Ward**. This is ‘**NOT True**’ as is described later.

The FOI Response indicates “*Information regarding the total number of demolitions in each ward is not held centrally.*”

- *The Council does not hold the information we requested in a reportable format.*
- *The Council does not know the **exact Area** in hectares of any “Place”*
- *The Council does not hold the **Number of Dwellings per “Place.”***
- *The Council does not hold the **Number of Persons per “Place”***

2.2.4 The analysis of this limited information (FOI request) supports our assumption that the completions are recorded but that no action is taken by the LPA as a result of those

⁵ <https://www.croydon.gov.uk/sites/default/files/2022-01/proposed-submission-of-croydon-local-plan-2019-to-2039-tracked-changes.pdf>

completions and that the **“Place” Area does NOT equate to the sum of the Shirley North and Shirley South Ward Areas.**

Shirley North				
	2018	2019	2020	2021 (partial)
Gross units	48	94	73	16
Net units	45	87	69	12
Shirley South				
	2018	2019	2020	2021 (partial)
Gross units	12	17	3	5
Net units	10	15	0	5
Shirley Place				
	2018	2019	2020	2021 (partial)
Gross units	60	111	76	21
Net units	55	102	69	17

- 2.2.5 Analysis of the recorded data shows over the **‘three’ full years 2018 to end of 2020**, the Net Increase in Dwellings for Shirley = Shirley North + Shirley South = **55 + 102 + 69 = 226 ≈ 75** per yr. (this is **NOT The Shirley “Place”** but the net increase for the **Shirley North + Shirley South Wards**).

TARGET OUTTURNS (Estimates)							
Locality	Area (ha)	Dwellings	Population	Percentage of Shirley (Place?)	Units over 20 yrs (Estimate)	Per Year	Actual (Outturn/yr)
Shirley North Ward	327.90	6555	15666	45.85%	127	6	?
Shirley South Ward	387.30	5919	14147	54.15%	151	8	?
All Shirley	715.20	12474	29814	100.00%	258	12	75
Shirley "Place" (Approximately)	770.00	?	?	107.66%	278	75	?
MORA AREA	178.26	3884	9283	24.92%	69	3	34

Estimated Target Outturns for Shirley and the MORA Area of 178ha (24.92%) portion of Shirley Ward Wards

- 2.2.6 The **MORA Area** of 178.2ha (which we monitor) is only **24.92%** of **All Shirley**, but at a rate of **34dpa** over the **20yr** period, **≈ 680** would exceed the **Target for the Shirley “Place” of 278** by **402 Dwellings** **for the Whole of the Shirley “Place” (≈770ha FOI response)**. This is $(680-278)/278 = 144.6\%$ Increase for the Shirley “Place” when the **MORA Area** is only **23.14%** of the area of the **Shirley ‘Place’**. This is **NOT respecting the character of the locality**.
- 2.2.7 The rate of dwellings is averaging **55 + 102 + 69 = 226 ≈ 75.33 per yr. dwellings per year**, so over **20** years will be **≈ 1507 dwellings**. (Exceeding the Target by **≈1,229**). The Target for the Shirley Place at **Table 3.1** of the Revised **Croydon Local Plan** indicates a Target of **278 dwellings over the period 2019 to 2039**.
- 2.2.8 From the **FOI Request**, the Area of the Shirley “Place” is **≈770ha**. The total Area of Shirley North & South Wards is **715.2ha** (GLA figures) therefore, there is a **54.8ha** excess of land in other adjacent Wards which numerically means the **Target for Shirley Wards of 278** should be reduced by **7.12% = 258** (and the difference added to the Targets of the relevant adjacent Wards).
- 2.2.9 We are confident that this analysis refutes any attempt to argue that **“Housing Need”** is a reason for approval in this locality as the assessed **Housing Need for this area has already been Met.**

2.2.10 We therefore assert that the pressure for housing need in Shirley has been fully satisfied within the period to date and that further excessive redevelopments would only aggravate and create hostility from local residents when it is necessary to gain support from existing residents for moderate re-developments and increased residential and housing density in the locality.

3 Reason for Refusal 3

3.1 Refusal 3

“The proposed development would result in unacceptable standard of accommodation by reason of limited external amenity space for the houses, poor access arrangement, and no details in terms of sufficient fire safety measures, thereby conflicting with Policy DM10 of the Croydon Local Plan 2018, Policies D5, D6, D7, D12 of the London Plan 2021 and the Suburban Design Guide SPD (April 2019).”

Private Open Space offered (Rear Garden)	Private Open Space offered (Front Garden)	Private Open Space (Required)
41	28.5	8
22	29	8
35.8	32	8
35.7	27.5	8
21.5	28.3	8
37	26	8
193	171	48
32.17	28.55	8.00

3.1.1 We agree that the amenity is uncharacteristically small as compared to the locality and surrounding properties, but the external private amenity space allocated is within the stated DM10 Policy of 5m² for 1 – 2 persons plus 1m² for every additional person. Therefore, we do not understand why the amenity space offered is considered inadequate as defined by the Policy. The Policy is, in our view, inadequate. (1m² for one person is just enough for a deckchair but not enough to move around it!)

3.1.2 The access from Woodmere Avenue via Pipers Gardens of width ≈4.4m seems to be adequate for vehicle swept paths and due to being a cul-de-sac, is unlikely to suffer significant traffic flows. There are adequate visibility splays and sight lines.



- 3.1.3 However, there is no public footpath either side of Pipers Gardens from Woodmere Avenue which could be considered dangerous for the many new occupants of the proposed development as pedestrians, push chair and wheelchair users would need to use the roadway and compete with vehicles for road space for access and exit to/from Woodmere Avenue. This is a likely hazardous situation for future and existing occupants of Pipers Gardens, increased by the fact of increased occupancy.

3.2 Fire Safety

- 3.2.1 There are no fire safety reports or details to meet Fire Safety regulations. The LPA provided this criticism of the proposal as a method to advise the applicant to consider the requirement when reapplying for Planning permission with a revised application, as there is no mechanism for requesting conditions in a refusal. Conditions and other such information are only appropriate if the application is approved.

4 Reason for Refusal 4

4.1 Refusal 4

“The proposed development would result in the avoidable loss of a Yew tree (T2) and officers are concerned over the impact the proposal would have on a further Pine tree (T3) both of which offer good prominent visual amenity value, are considered to be of long life expectancy and make a contribution to the character of the area thereby conflicting with policy DM28 of the Croydon Local Plan 2018.”

- 4.1.1 We are not qualified to comment or assess the loss of amenity value of the trees referenced in the refusal, but it is recognised that their retention is of benefit to the environment and helps to mitigate and adapt to climate change.

5 Reason for Refusal 5

5.1 Refusal 5

“The proposal has failed to demonstrate that it would not have an unacceptable ecological impact on biodiversity of the area contrary Policy DM27 of The Croydon Local Plan (2018).”

- 5.1.1 We are not qualified to comment or assess the ecological impact on biodiversity of the area due to the development proposal referenced in the refusal, but it is recognised that biodiversity and natural wildlife heritage, including individual species of particular interest or scarcity, is not confined to the designated Sites of Nature Conservation Importance. Small open spaces, ponds, streams, back gardens, hedgerows, trees, unimproved grassland, heathland, or 'wasteland' habitats can be important support for the borough's biodiversity and enable people to access and enjoy nature.

6 Reason for Refusal 6

6.1 Refusal 6

- 6.1.1 *“The proposed development would result in inappropriate cycle storage facilities by reason of design and position to one of the houses, does not provide sufficient detail to demonstrate inclusion of electrical vehicle charging points or blue badge parking and would therefore be contrary to Policies, DM29, DM30 of the Croydon Local Plan (2018)*

and Policies T4, T5 and T6 of the London Plan 2021.”

- 6.1.2 The proposed location of the Cycle Store for Units 2 and 5 replace the location for used (as used by other Units) Refuse Bin Storage positions on the frontage forecourts. It is unclear where the Refuse Bins for Units 2 and 5 are to be located (if provided).
- 6.1.3 The proposed development failed to indicate any provision of Electric Vehicle Charging Points in accordance with the 20% Policy Requirement. Although the Appellant has indicated this could be secured by conditions, there is no mechanism for placing conditions for refusals.

7 Reason for Refusal 7

7.1.1 Refusal 7

“In the absence of a legal agreement securing sustainable highway contributions and establishing if off street vehicle access can be achieved, the proposal would be contrary to Policies SP8 and DM29 of the Croydon Local Plan 2018 and Policy T4 of the London Plan 2021.”

- 7.1.2 We have no additional comment other than to support the LPA on this reason for refusal.

8 Conclusions

- 8.1 We have documented our assessment of the Appellant’s Ground of Appeal and are of the opinion that we have established sufficient reasons to dismiss this Appeal.
- 8.2 Our evidence is mainly based upon National Planning Policies (NPPF) recommended Design Code Assessments and also supported by the London Plan Policies and the Croydon Local Plan Policies. We have not made any subjective assessments which could be interpreted differently.
- 8.3 We urge the Inspector to Dismiss this Appeal on the Grounds listed above and any additional reasons the Inspector feels appropriate.

Kind Regards

Derek



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Sony Nair
Chairman MORA
Monks Orchard Residents’ Association.
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