

Case Officer – Ms. Victoria Bates
Development Environment
Development Management
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Bernard Weatherill House
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Croydon
CR0 1EA

**Monks Orchard Residents'
Association
Planning**

7th January 2023

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Reference	22/05186/FUL
Application Received	Tue 13 Dec 2022
Application Validated	Wed 14 Dec 2022
Address	176 & 178 Orchard Way Croydon CR0 7NN
Proposal	Demolition of existing dwellings, erection of four pairs of two storey 3-bed semi-detached dwellings with roof accommodation, with car parking; formation of accesses onto Sloane Walk together with a new pavement; and provision of cycle, refuse stores and soft landscaping
Consultation Expiry:	Mon 16 Jan 2023
Decision Deadline:	Wed 08 Feb 2023
Case Officer:	Ms. Victoria Bates

Dear Ms. Bates

Please accept this letter as a formal objection to **Application Ref: 22/05186/FUL** for the Demolition of existing dwellings, erection of four pairs of two storey 3-bed semi-detached dwellings with roof accommodation with car parking; formation of accesses onto Sloane Walk together with a new pavement; and provision of cycle, refuse stores and soft landscaping.

The **Monks Orchard Residents' Association** represents approximately **3,800** households in the **Shirley North Ward**.

Planning History:

- 1) **Ref: 21/06038/FUL** | 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 | 176 - 178 Orchard Way Croydon CR0 7NN.
Decision Permission **Refused**
Decision Issued Date Mon 13 Jun 2022
- 2) **Ref: 21/01635/FUL** | 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.
Decision Permission **Refused**
Decision Issued Date Wed 14 Jul 2021
Appeal Ref: APP/L5240/W/21/3281590
Decision date: 27th June 2022 - appeal **dismissed**.



- 3) **Ref: 05/04112/P** | Received: Tue 27 Sep 2005 | Validated: Tue 27 Sep 2005 | Status: Decided
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
Permission **Refused** 02 Dec 2005
- 4) **Ref: 05/03658/P** | Received: Thu 25 Aug 2005 | Validated: Thu 25 Aug 2005 | Status:
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
Decided. **Withdrawn application** 28 Sep 2005

Site Area	0.14	ha	Residential Density		314.29	bs/ha	Area Type Setting (Residential)			Central	PTAL ⁽¹⁾	0.66
Site Area	1400	sq.m.	Housing Density		57.14	u/h	Area Type Setting (Housing)			Suburban	PTAL ⁽¹⁾	0.66
Units	8		Floor Area Ratio		0.6586		Post Code (CR0 7NN) Area Type			Outer Suburban		
Plot	House Type	Floor	Bedrooms	Bed Spaces	GIA (Offered) (sq.m.)	GIA (Required) (sq.m.)	In-Built Storage (Offered) (sq.m.)	In-Built Storage (Required) (sq.m.)	Amenity Space (Offered) (sq.m.)	Amenity Space (Required) (sq.m.)	Car Parking Spaces	Type: EVC Disabled
Plot 1	A Corner	Ground	3	0	113.02	93	Not Stated	2.5	48.36	8.0	2	Not Stated
		First		3								
		Second		2								
Plot 2	A	Ground	3	0	111.38	93	Not Stated	2.5	51.61	8.0	2	Not Stated
		First		3								
		Second		2								
Plot 3	A	Ground	3	0	111.38	93	Not Stated	2.5	55.39	8.0	2	Not Stated
		First		3								
		Second		2								
Plot 4	A	Ground	3	0	111.38	93	Not Stated	2.5	61.87	8.0	1	Not Stated
		First		3								
		Second		2								
Plot 5	B	Ground	3	0	118.72	102	Not Stated	2.5	63.02	9.0	1	Not Stated
		First		4								
		Second		2								
Plot 6	B	Ground	3	0	118.72	102	Not Stated	2.5	107.06	9.0	2	Not Stated
		First		4								
		Second		2								
Plot 7	B	Ground	3	0	118.72	102	Not Stated	2.5	99.88	9.0	1	Not Stated
		First		4								
		Second		2								
Plot 8	B	Ground	3	0	118.72	102	Not Stated	2.5	147.15	9.0	1	Not Stated
		First		4								
		Second		2								
Totals			24	44	922.04	780	-	20	634.34	68	12	-
Note 1	PTAL at 176 Orchard Way is Zero and at 178 Orchard Way is 1b (Numerically equivalent ≈ 1.33. Therefor assumed combined PTAL≈ 0.66											

1 Parameters of this latest proposal:

- 1.1 **The Offered Plans for Plot 2 'Side' Elevation - Drawing: UT- A04 is incorrect** (The elevation should show the **East facing elevation**, the **West elevation is Plot 1**)

2 Comparison with previous proposal

- 2.1 It is understood each Application is considered in isolation and on its own merits, and against the most recent **Planning Policies**. However, Plots Nos 1 to 6 are similar positioning to the previous refused application with slight reconfiguration internally.
- 2.2 The '**Accommodation Schedule**' indicates **Units 1 to 4 are 3 Bed 5 person** and **Units 5 to 8 are 3 Bed 6 person**, increasing the overall capacity from 22 Bedrooms and **40 bedspaces** to **24 bedrooms** and **44 bedspaces**, thus increasing the **Residential Density** from **285.71bs/ha** previously to **314.29bs/ha**. This is an increase in '**overdevelopment**' to the previous refused proposal.



- 2.3 Elevation Drawing **UT- A04 Plot 2**, shows a **West Facing** elevation which would be the cross section dividing wall between Plots 1 & 2. The **Plot 2** Elevation should show the **East Facing** elevation.
- 2.4 **Plots 5 to 8** are a continuation of the design and elevations of **Units 1 to 4**. The configuration of units still follows the layout albeit slightly modified, of the previous refused proposal.
- 2.5 **The Building Line & 'Set-Back'**
- 2.5.1 It is noted that the **Site Layout Drawing PL-04** does **not** have any **Scale or scaling bar** as required of the **Validation Checklist** which states: *"Plans must be drawn to a recognised standard metric scale, include a scale bar, ..."* and therefore fails the validation checklist requirements.
- 2.5.2 **The Building Line and 'Set-Back'** for this development proposal is established by **Units 1 & 2** at the corner **'return'** from **Orchard Way** into **Sloane Walk** which sets the **building Line** at approximately $\approx 6\text{m}^1$ from the new footpath along **Sloane Walk**.
- 2.5.3 However, **Units 5 to 8** are less than $<1\text{m}$ from the footpath and therefore do not follow the **'newly'** established **Building Line Set-back** from the footpath by **Units 1 to 4**.



Building Line Setback is $\approx 6\text{m}$ from the footpath (Marked light Blue on the above Site Layout Plan).

- 2.5.4 The **National Model Design Code & Guidance²** published by the **Department for Levelling Up, Communities & Housing (DLUCH)** in January/June 2021 at **Part 1 - The Coding Process for Area Types** (See Ref:2 , Figure 19 page 21) **"Built Form vii "Building Line"**, provides appropriate **Policy Guidance** in relation to **Area Type Settings** and the appropriate **Building Line & Set-Back** for various **Area Types and settings**. For a **Suburban Area Type Settings**, the **Building Line Set-back** range is **3m to 6m**, and once established, **the building line should be followed"**.

Built Form vii Building line: *"The building line is created by the primary front face of buildings along a street and is a key element of design codes. New development*

¹ Design and Access Statement Page 16: **"Orchard Way Elevation"** scaled.

² <https://www.gov.uk/government/publications/national-model-design-code>



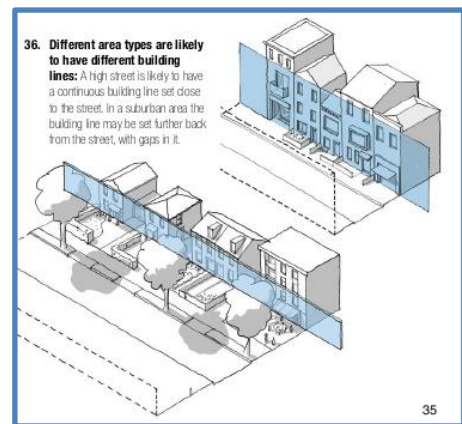
should follow the established building line where it exists. Where there is no building line (for example on the periphery of a town centre or a development site), **codes should set one.** Coding for building lines can include:

- **Variation:** The extent to which buildings can be set forward or **back from the line.**
- **Projections:** Allowance for elements such as balconies.
- **Compliance:** The percentage of the building line that should be occupied by development.
- **Set-Back:** **The distance that buildings are set back from the pavement.**

2.5.5 Part 2 Guidance B.2.ii Building Line (page 35)

“108. Attractive streets and other public spaces are generally defined by the frontages of buildings around their edges.

*109. A building line represents the **alignment of the front face of the buildings** in relation to a street or other public space. The nature of this line and its position in relation to the street contribute to the character and identity of a place. It may be straight or irregular, continuous or broken. A consistent approach to building line in an area type or street type helps to give it a **coherent identity.**”*



2.5.6 Additionally, the **Dining Room Windows** of **Units 5 & 6** and **Units 7 & 8** fronting **Sloane Walk**, would be within approximately **<1 metre** of pedestrians using the new footpath. This closeness would seriously compromise the privacy of occupants of **Units 5 to 8** for the life of the development.

2.5.7 See also Section 9 on invasion of Privacy and overlooking.

2.6 Unit Boundaries

2.6.1 The proposal includes provision of a footpath along the frontages of the proposed development with **Sloane Walk** but the proposal does not specify any details or the proposed footpath dimensions of **width, dropped kerbs or kerb heights which meet Public Realm guidance or requirements.**

2.6.2 There remain significant boundary issues which have previously been identified and thus the applicant has had an opportunity to resolve these for any re-application for this site. However, these problems have not been addressed.

2.6.3 The Schedule of Accommodation provided shows allocation of Car Parking Spaces to Units. **Units 1 & 2** have defined Parking within their respective boundaries.

2.6.4 However, **Units 3 & 4** have no defined separation of the front forecourts and thus have no defined separation between parking spaces, in fact it looks on face value that the two bays left most parking space, fronting Unit 4, are bridging the sight boundary line with **Plot 3** and could result in conflicting disagreements between occupiers of **Units 3 & 4.**



Boundaries of Units within the Proposed Site Showing ownership and Car Parking Provision.

- 2.6.5 Further, **Unit 5** Parking allocation in the Schedule of Accommodation has **one (1)** Parking Bay but this Parking Bay is on the **forecourt of Unit 4** which is **unacceptable**. This means **Unit 5's** Parking is probably on land owned by the owner (Titleholder) of **Unit 4**. This is an extremely irrational and inappropriate arrangement irrespective of the Titleholder relationship and would most definitely cause significant confrontation between the future occupants of **Units 4 & 5**. This is an extremely inappropriate Parking arrangement and definitely **NOT** considered **"Good Design"** principles. This is further evidence of overdevelopment, squeezing the required **12 Parking spaces** onto the **Site Area** which cannot adequately cope with the requirement.
- 2.6.6 Parking for **Unit 6** is **2 Spaces in line**, such that if the furthest vehicle owner requires to exit, the vehicle blocking the exit has to be moved and replaced after the manoeuvre. This double shunting is hazardous to other Road Users especially if the moved vehicle is left in a kerbside parked near the corner with Orchard Way, before being replaced in the exited bay. This is another example of **Bad Design** forced by overdevelopment of the site, squeezing site requirements onto the **Site Area** which cannot adequately cope with the requirement.
- 2.6.7 These may not be specifically noncompliance to Planning Policy Issues but are definitely not meeting **"Good Design principles"**. It is felt that the possible consequences of these configurations should be considered and addressed prior to a determination to prevent future problems of ownership and contested access by legal representations. It is professionally unacceptable to ignore these probable future problems. If no solution is feasible within the constraints of the Site Capacity, this application should be refused.
- 2.6.8 Croydon Revised Local Plan at para 6.109 States:

"6.109 ~~Paragraph 56~~ Paragraph 126 of the **National Planning Policy Framework (requiring good design)** outlines the need for robust and comprehensive policies that 'establish a **strong sense of place**, using **streetscapes** and buildings to create attractive and comfortable places to live, work and visit'. Furthermore, policies should aim to '**create safe and accessible environments** where crime and disorder, and the fear of crime, **do not undermine** quality of life or **community cohesion**'."



2.6.9 London Plan Policy D4 - Delivering Good Design, para 3.3.6 states:

*“3.3.6 **Good design** and good planning are intrinsically linked. The form and character of London’s buildings and **spaces** must be **appropriate for their location**, fit for purpose, respond to changing needs of Londoners, be inclusive, and make the best use the city’s finite supply of land. The efficient use of land requires **optimisation of density**. This means coordinating the **layout of the development** with the form and **scale of the buildings** and the location of the **different land uses** and facilitating convenient pedestrian connectivity to activities and services.”*

2.6.10 NPPF Section 12.³ Achieving well-designed places

*“126. The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. **Good design is a key aspect of sustainable development**, creates better places in which to live and work and helps make development **acceptable to communities**. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is **effective engagement between applicants, communities, local planning authorities** and other interests throughout the process.*

3 Local Design Code Assessment

3.1 The NPPF.

3.1.1 The NPPF para 129 states:

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

3.2 The LUHC National Model Design Code & Guidance⁴ Parts 1 & 2.

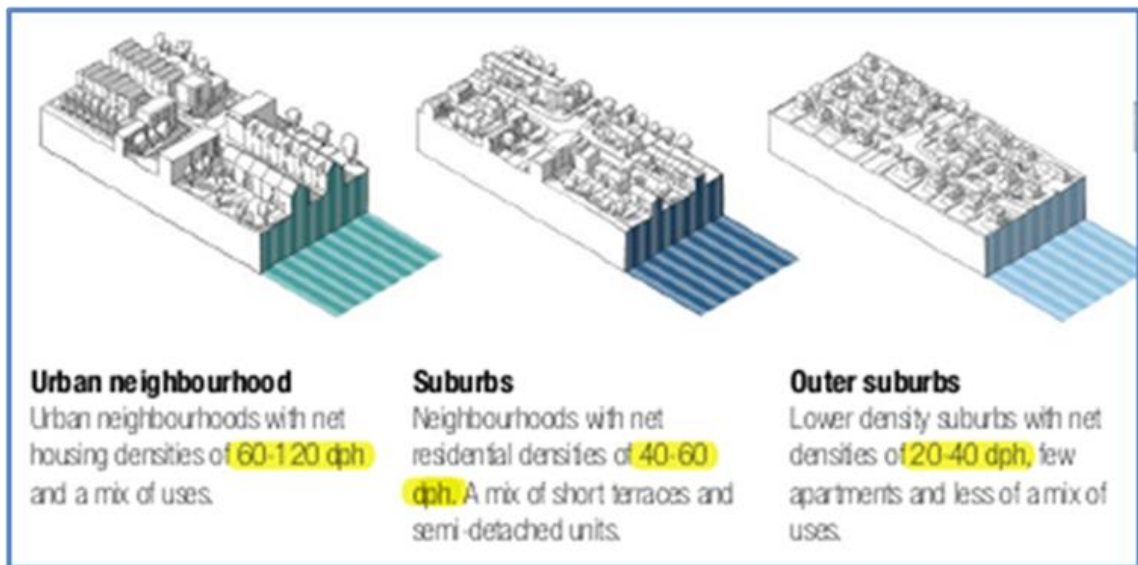
3.2.1 Area Type Settings

3.2.2 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.”*

3.2.2.1 The most appropriate analysis for Area assessment to define **Local Area Type Settings** is the **Post Code** of the **Area** of the proposed development. The **Post code** for this proposal is **CR0 7NN** as given on the Application.

³ <https://www.gov.uk/government/consultations/levelling-up-and-regeneration-bill-reforms-to-national-planning-policy>

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



National Model Design Code Area Type Settings Parameters

3.2.2.2 The details for the **Post Code** addresses are found from the **Valuation Office Agency** and the **number of occupants** from the “doogal” Postcode download.⁵

Parameters of Post Code Design Code				
Area Design Code Parameter (These parameters auto calc Design Code)		Input Parameters		Constrains
Post Code	CR0 7NN			Ward Shirley North
Area of Post Code (ha)	0.750604	hectares		Flood Risks Low Risk
Area of Post Code (Sq.m)	7506.04	sq.m.		Gas Pressure Low
Number of Dwellings (Units) 25/11/2022	28	Units		Water Pressure N/A
Number of Occupants (Persons) 25/11/2022	54	Persons		HASL (m) Average 53m
Post Code Housing Density	37.30	Units/ha		Building Line Set-Back Various
Post Code Residential Density	71.94	Bedspaces/ha		
Area Type (National Model Design Code)	Outer Suburban	Setting		
https://www.doogal.co.uk/PostcodeDownloads				
Design Code Parameters		Min	Max	Measure
Area Type Setting (NMDC)	Outer Suburban	20	40	Units/ha Range
Equivalent Residential Density (Persons/ha)	Outer Suburban	47.20	94.40	Persons/ha Range
		U/ha	bs/ha	
PTAL (now) 176 PTAL 0 & 178 PTAL 1b (≅1.33)	0.66	22.20	52.39	Limits for PTAL
PTAL (forecast 2031)	0.66	22.20	52.39	Limits for PTAL
Gentle Intensification (Limits in U/ha & bedspaces/ha)		26.67	62.93	Limits 'Gentle' Intensification
Moderate Intensification (Limits in U/ha & bedspaces/ha)		33.33	78.67	Limits 'Moderate' Intensification
Focussed Intensification (Limits in U/ha & bedspaces/ha)		40.00	94.40	Limits 'Focussed' Intensification

The Important Design Code parameters for the local Post Code CR0 7NN.

3.2.2.3 However, the analysis, **CR0 7NN** establishes that **Post Code CR0 7NN** is not ‘contiguous’ and therefore it is necessary to separately assess each dwellings **Site Area**.

3.2.2.4 The reason this list is shortened from the 177 quoted in the VOA list is a result of removal of all deleted entries and the grouping of the **128 Orchard way Flats A to M** and **Flats 1 to 12 Chaseley Green Court** resultant on the demolition of **114 Orchard Way** and the **12 Flatted redevelopments of Chaseley Green Court**.

Showing 1 - 20 of 117 results				
Last updated on 14 December 2022				
Address	Council Tax band	Local Authority	ha	sq.m.
106 ORCHARD WAY, Croydon, CR0 7NN	F	Croydon	0.1089	1088.57
116 ORCHARD WAY, Croydon, CR0 7NN	D	Croydon	0.0593	592.66
128B to 128M ORCHARD WAY, Croydon, CR0 7NN	C	Croydon	0.1388	1388.12
138 ORCHARD WAY, Croydon, CR0 7NN	E	Croydon	0.0138	138.05
164 ORCHARD WAY, Croydon, CR0 7NN	F	Croydon		
166 ORCHARD WAY, Croydon, CR0 7NN	E	Croydon	0.1724	1723.98
168 ORCHARD WAY, Croydon, CR0 7NN	E	Croydon		
176 ORCHARD WAY, Croydon, CR0 7NN	E	Croydon		
178 ORCHARD WAY, Croydon, CR0 7NN	F	Croydon	0.1400	1400
1 to 12 CHASELEY GREEN COURT 114, ORCHARD WAY, Croydon, CR0 7NN	D	Croydon	0.1175	1174.66
Total			0.7506	7506.04

⁵ <https://www.doogal.co.uk/PostcodeDownloads>



These are separate from 176 & 178 Orchard Way but are in the same Post Code. TfL WebCAT puts 176 Orchard Way at PTAL Zero and 178 Orchard Way at PTAL 1b \equiv 1.33 (Numerically). Therefore, the Average PTAL is \approx 0.66.

- 3.2.2.5 This assessment puts the Post Code CR0 7NN Area Type Setting at **"Outer Suburban"** for both Housing Density (Units/ha) and Residential Density (persons/ha) which is comparable with other assessments for Shirley North Ward based on the National Model Design Code & Guidance.

Location	Area (ha)	Population (Nat Ave)	Dwellings (Units) (Nat Ave)	Residential Density (bs/ha)	Housing Density (Units/ha)	"Setting" for Design Code Residential Density (bs/ha)	"Setting" for Design Code Housing Density (U/ha)	Occupancy Ratio (Nat Ave 2.36)
Croydon	8,652.00	390,719	165,559	45.16	19.14	<Outer Suburban	<Outer Suburban	2.36
Shirley North Ward	328.00	15,406	6,528	46.97	19.90	<Outer Suburban	<Outer Suburban	2.36
Shirley South Ward	384.40	10,619	4,500	27.62	11.71	<Outer Suburban	<Outer Suburban	2.36
All Shirley	712.40	26,025	11,028	36.53	15.48	<Outer Suburban	<Outer Suburban	2.36
MORA Area	178.26	9,166	3,884	51.42	21.79	Outer Suburban	Outer Suburban	2.36
Post Code CR0 8S(*)	16.95	627	237	36.99	13.98	<Outer Suburban	<Outer Suburban	2.65
Post Code CR0 8T(*)	11.82	644	246	54.48	20.81	Outer Suburban	Outer Suburban	2.62
Post Code CR0 7PL	1.73	47	19	27.17	10.98	<Outer Suburban	<Outer Suburban	2.47
Post Code CR0 7QD	1.51	68	28	45.03	18.54	<Outer Suburban	<Outer Suburban	2.43
Post Code CR0 7PB	1.26	40	25	31.75	19.84	<Outer Suburban	<Outer Suburban	1.60
Post Code CR0 8UB	1.70	71	30	41.89	17.70	<Outer Suburban	<Outer Suburban	2.37
Post Code CR0 7NA	1.97	36	18	18.27	9.14	<Outer Suburban	<Outer Suburban	2.00
Post Code CR0 7NE	0.83	26	11	31.33	13.25	<Outer Suburban	<Outer Suburban	2.36
Post Code CR0 7NN	0.75	54	28	71.94	37.30	Outer Suburban	Outer Suburban	1.93
Post Code CR0 7RL	1.40	60	24	42.72	17.09	<Outer Suburban	<Outer Suburban	2.50
Post Code CR0 7PX	0.96	21	11	21.81	11.43	<Outer Suburban	<Outer Suburban	1.91
Shirley Oaks Village ^{Note 2}	19.12	1,286	545	67.26	28.50	Outer Suburban	Outer Suburban	2.36
Shirley "Place" ^{Note 1} (Estimate)	770.00	32,995	13,981	42.85	18.16	<Outer Suburban	<Outer Suburban	2.36
Average (Not including Croydon)	143.12	5,717	2,420	40.94	17.98	<Outer Suburban	<Outer Suburban	2.29

Note 1: FOI request (Ref: 4250621) on 31st January 2022

Note 2: All the green areas in Shirley Oaks Village, except for the 1.4 Hectares off Poppy Lane were legally classified as Ancillary space for the houses in the section 52 agreement with the Council when the estate was built. This was because the houses were built with small gardens.

Assessment of Area Type Settings for Shirley including Various Post Codes

3.3 Application Details:

Application Details			
Application Ref:	22/05186/FUL		
Address	176-178 Orchard Way		
PostCode	CR0 7NN		
Consultation Close	16th January 2022		
Parameters			
Site Area (ha)	0.1400	ha	
Site Area (sq.m.)	1400.00	sq.m.	
Units (Dwellings)	8.00		
Bedrooms	24.00		
Bedspaces	44.00		
Housing Density	57.14	Units/ha	
Residential Density	314.29	bs/ha	
		Min	Max
Area Type Setting (Units/ha)	Suburban	40.00	60.00
Area Type Setting (Bedspaces/ha)	Central	283.20	<283.2
		U/ha	bs/ha
PTAL (Current)	0.66	42.20	#VALUE!
PTAL (Forecast)	0.66	42.20	#VALUE!

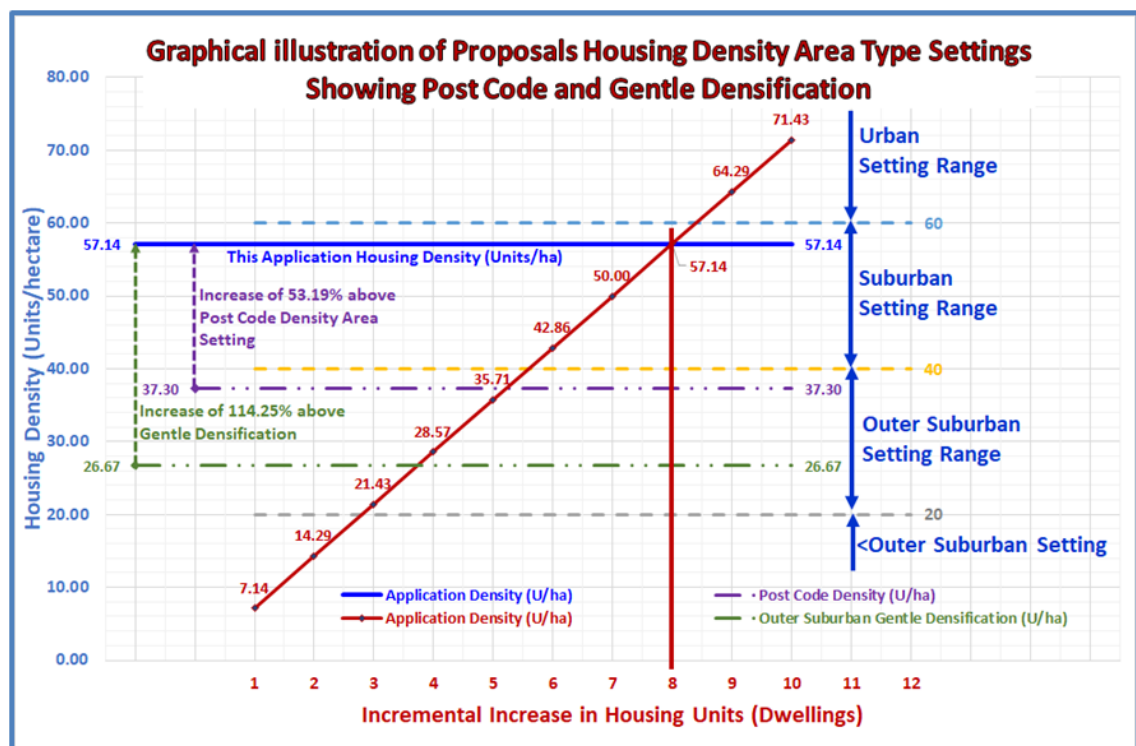
Important Proposal Parameters including Assessment of Area Type Settings and Densifications

(Note: Residential values cannot be calculated for Central Area Type Settings as there is no maximum value in the formula so excel returns #VALUE!).



4 Area Type Setting Assessment

- 4.1 The local **Area Type Setting** is defined by assessing the parameters of the Post Code and the character of the locality. The analysis of the **Post Code** shows that the Area is **Outer Suburban** as detailed above. The proposal however, at a **Housing Density** of **57.14Units/ha** requires an **Area Type Setting** in a **Suburban** Setting Range approaching an **Urban** Range at **60 Units/ha**.
- 4.2 The increase from the **Post Code Density** of **37.30Units/ha** to the proposal of **57.14Units/ha** to close on the maximum of the **Suburban Area Type Setting** range is an increase of **53.19%**, which cannot by any stretch of the imagination be considered a **"Gentle"** densification increase.
- 4.2 The **Outer Suburban "Gentle"** Densification is proposed at **≈26.67Units/ha** (See paras 5 to 7 below) but the proposal would present **57.14Units/ha** which is an increase of **114.25%** above the recommended **"Gentle"** densification (**26.67U/ha** for 'Outer Suburban'). These assessments provide ample proof the the proposal is an over development for this **Site capacity at an Outer Suburban Area Type Setting**, and should therefore be refused.



Proposed Housing Density at 8 Units in an Outer Suburban Setting exceeds the Outer Suburban Area Type Range and is more appropriate for the high end of a Suburban Area Type Setting.

5 Growth

- 5.1 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.

- 5.2 The **Revised draft Local Plan (2021)** includes **"Focussed"**, **"Moderate"** and **"Gentle"** intensification but again gives no guidance on the magnitude of these abstract descriptions.

5.3 Revised Croydon Local Plan (2021) Growth Policies

- 5.3.1 **SP1.0C** There are residential areas where the characteristics and infrastructure provision have led to the identification of potential for sustainable housing growth and renewal.

- a. Areas of **Focused Intensification** are areas where a *step change of character to higher density* forms of development around transport nodes and existing services will take place.
- 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*.

- 5.3.2 There is no further clarification in the **Revised Local Plan (2021)** Policy definition or at Policy **DM10** which defines or clarifies any differences between these **"Growth"** Definitions.

- 5.3.3 The following provides **"Guidance"** to assess future **Densification/Intensification** of proposed developments for managed **"Growth"** which must ensure **sustainability**. Unrestricted **"Growth"** within areas of **limited infrastructure** supporting only the existing **Area Type Setting** population with inadequate planned infrastructure improvement to sustain the proposed increased density, would result in **'unsustainable'** illegal developments.

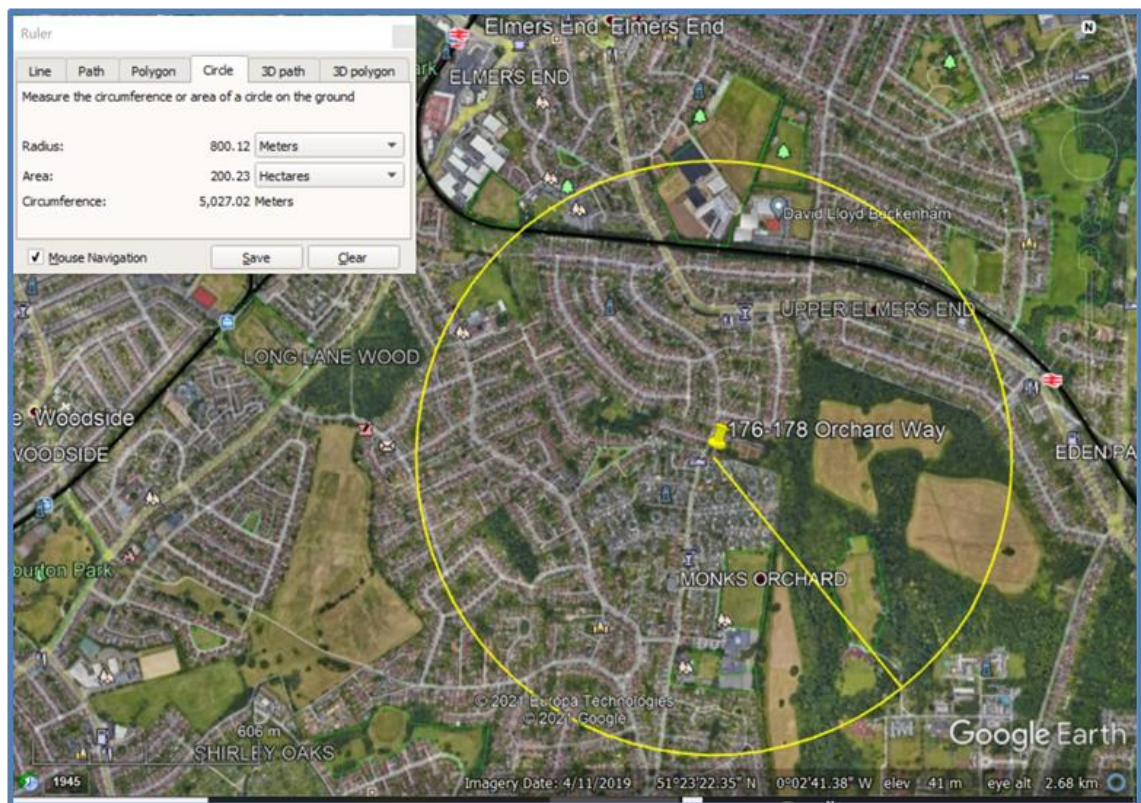
6 Densification/Intensification

6.1 London Plan Policy H2 Small sites:

6.1.1 Incremental Intensification Para 4.2.4

*"4.2.4 **Incremental intensification** of existing residential areas within **PTALs 3-6** or within **800m** distance of a station⁴⁷ or town centre boundary⁴⁸ is expected to play an important role in contributing towards the housing targets for small sites set out in **Table 4.2**. This can take a number of forms, such as: new build, infill development, residential conversions, redevelopment or extension of existing buildings, including non-residential buildings and residential garages, where this results in net additional housing provision. These developments should generally be supported where they provide well-designed additional housing to meet London's needs."*

- 6.1.2 **Incremental** is an **'adjective** (*'increasing or adding on, especially in a regular series')*. Although there is no rate 'definition' of **"Incremental,"** localities with **PTALs <3** and **>800m from a Train/Tram Station or District Centres** are thus **'inappropriate'** for **'Incremental Intensification'** (whatever that implies)!



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

7 **Densification/Intensification Limits**

- 7.1 As each of the **National Model Design Code Area Types** relies on the **currently available** supporting infrastructure for the locality, unless there are programs of **'improved infrastructure'** over the life of the plan, any **densification** within an **Area Type or Setting** relies on that **'existing Supporting Infrastructure'** and therefore any **"densification" or Intensification** should **remain within** the range of the **Area Type Setting** as defined, in order to remain within adequate **supporting infrastructure "sustainability"** for the **proposed development**. **This is fundamental to the requirement of sustainability.**⁶
- 7.2 The following **Graphical Illustration** shows an extremely simple **'suggested' incremental increase in Design Code Housing Density** (units/ha) of $\frac{1}{3}$ **"Gentle"** & $\frac{2}{3}$ **"Moderate"** incremental limit within the Ranges of **"Outer Suburban"**, **"Suburban"** and **"Urban"** for **"Gentle", "Moderate" and for "Focussed" Intensification**, an increase to the **maximum of the current setting** as an example.
- 7.3 There is no upper limit to **"Central" Area Type Settings** which is managed by the requirement to meet **Minimum Internal Space Standards** (London Plan Table 3.1).

⁶ Section 2 Achieving sustainable development

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



7.4

This is our interpretation of the **Local Plan Policy** by logical assessment and analysis, as there is no **'meaningful' guidance** in the **Croydon Revised Local Plan (2021)** or the **London Plan (2021)**. Sustainability of Developments is a **Legal Requirement** which cannot be guaranteed if the **Densification or Intensification** exceeds the available **supporting infrastructure** and there is no prospect of **improved infrastructure** over the Life of the Plan. **The LPA could recommend alternative proposals** or provide **guidance with allowable tolerances** within the **Area Type Setting** Design Code Densities, but has not done so as yet, to our understanding.

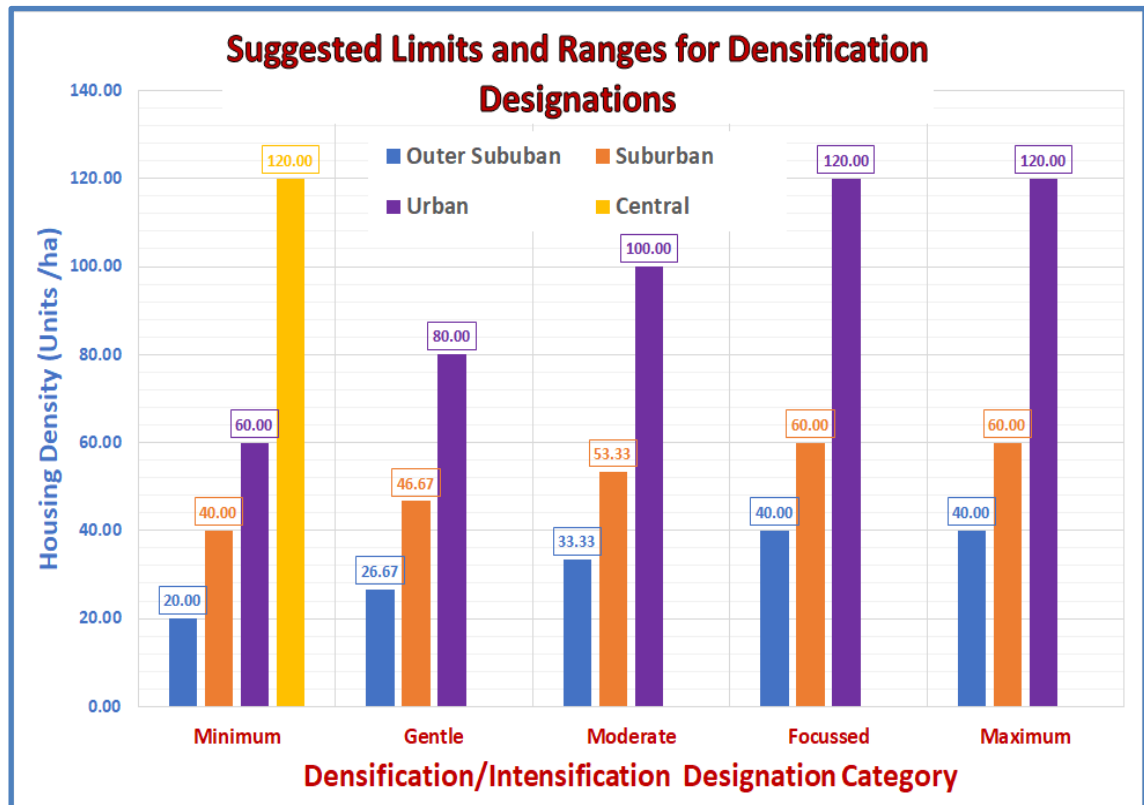


Illustration of Increased Densification/Intensification within the Area Type Settings to ensure Sustainable Infrastructure Support for proposed Developments

7.5

The **National Model Design Code & Guidance** is based upon **National** assessments and therefore in order to relate **Housing Density** to **Residential Density** we can assume a **UK National average Occupancy per Unit**. This is found from **National Statistics** ⁷ to be an average of **2.36** (2021) occupancy - persons per dwelling - for the UK.

7.6

As the **Area Types Settings** are based upon the **National Model Design Code Guidance**, we can use a **National** average value of **Unit Occupancy** using the Statista ⁷ **National UK Unit Occupancy** of **2.36 persons/Unit** (UK 2021) as a conversion factor from **Units/ha** to **bedspaces/ha**.

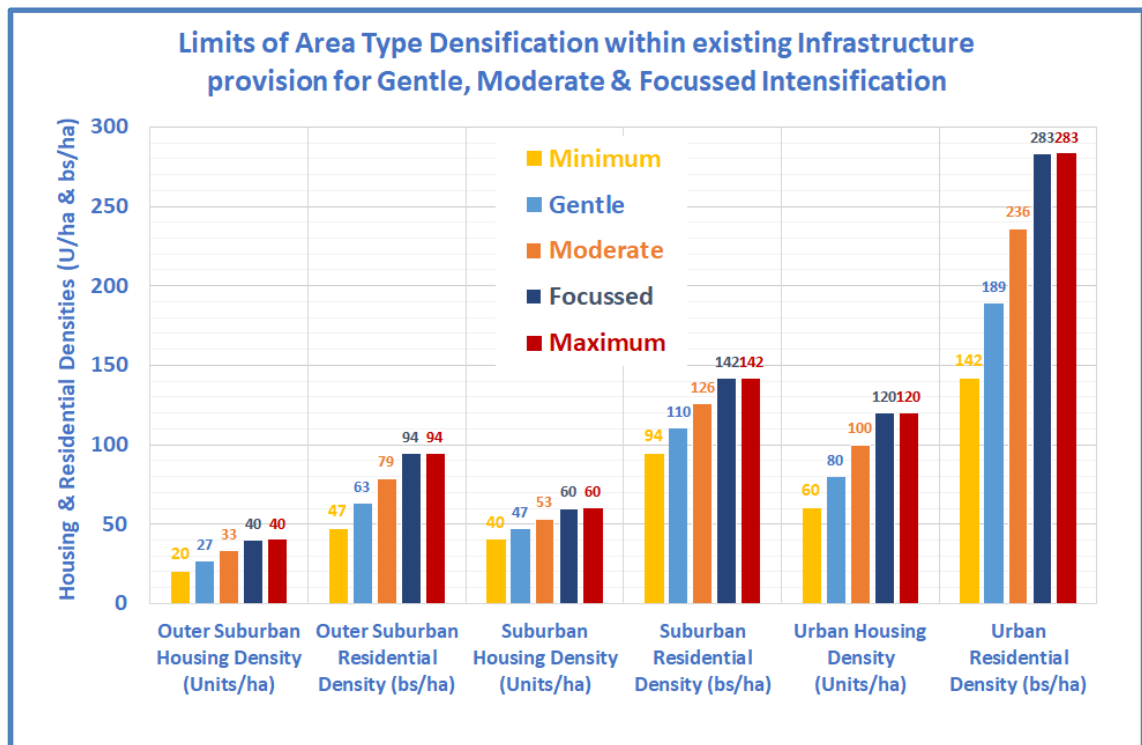
7.7

The average **National Housing** occupation per housing unit **Nationally** is **2.36 persons/Unit (2021)**. Therefore, we can assume **Nationally**, the **Outer-Suburban**

⁷ <https://www.statista.com/statistics/295551/average-household-size-in-the-uk/>



Setting Housing Density at 20 to 40 Units/ha would have 20 x 2.36 Persons/ha **≈47.2 persons/ha** to 40 x 2.36 persons/ha **≈94.4persons/ha**. Similarly, for **Suburban Settings** with Housing Density of 40 Units/ha would have **≈94.4persons/ha** to 60 x 2.36 persons/ha **≈141.6persons/ha** and **Urban Settings**, 60 to 120 units/ha would have **141.6persons/ha** to **283.2persons/ha**. The **Site Capacities** in hectares for an incremental increase in number of Units (Dwellings) for each category of **Densification & Intensification** are graphically specified below.



Graphical illustration of Housing & Residential Densities for the National Model Design Code Area Types for recommended “Gentle,” “Moderate” & “Focussed” Intensification

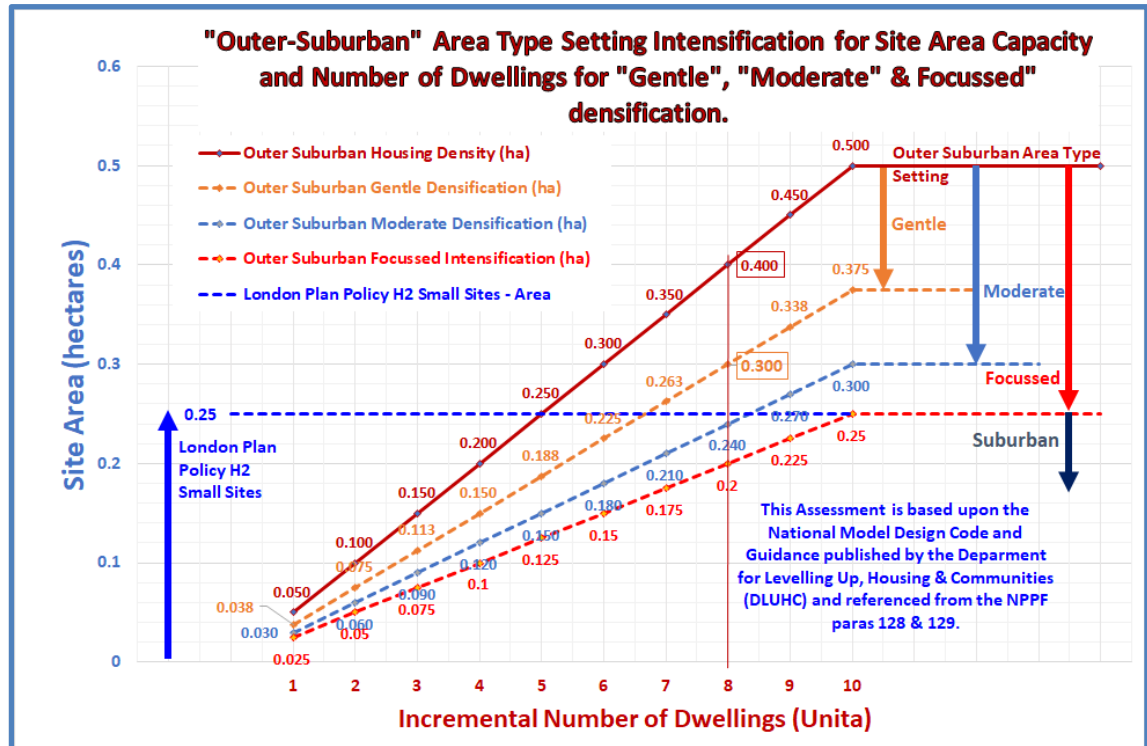
- 7.8 Analysis of the appropriate **“Site Capacities”** required to support **densification** or **intensification** for **Area Type Settings** assumes the **Site Capacities** in hectares for an incremental increase in number of **Units** (Dwellings) for each category of **Densification & Intensification** would follow a simple linear increase where:

$$y = \left(\frac{\delta y}{\delta x} \right) x + c \text{ where } y = \text{Site Area in ha}, x = \text{No of Units and } c = y \text{ when } x = 0$$

- 7.9 The proposal is for **8 Units** in an **‘Outer Suburban’ Area Type Setting** which would require a **Site Area ≈0.4ha** and for **‘suggested’ Gentle Intensification**, a **Site Area of ≈0.3ha** as shown by the Graphical Analysis (below); whereas the **actual Site Area is 0.14ha**. That equates to an overdevelopment of **185.71%** increase for an **“Outer Suburban”** Setting and a **114.286%** increase if **‘Gentle Densification’** is allowed. The **Site Area of 0.14ha** can only accommodate: $0.14/0.05 = 2.8$ Units i.e., **≈3 Units** for an **Outer Suburban** Area Type Setting or: $0.14/0.03744 = 3.7388$ i.e., **≈4 Units** for **Gentle Densification** in an **‘Outer Suburban’ Area Type Setting**.



- 7.10 This analysis and assessment illustrates the proposal is a significant over development for the locality based on **National Planning Policies** as defined in the **National Model Design Code & Guidance**. Therefore, this proposal should be **Refused**.



**Site Capacities for "Outer Suburban" Area Type Settings
Densification/Intensification**

- 7.11 **Application Floor Area Ratio (FAR) Design Code.**
- 7.11.1 Another measure of **Density** is the **Floor Area Ratio**. The **Floor Area Ratio (FAR)** is determined by **Gross Internal Area ÷ Site Area** (both in the same units of measure to give a ratio). The recommendation for a **Suburban Setting** is that the **Floor Ratio** Design Code should be **LESS THAN 0.5**. (i.e., <0.5).
- 7.11.2 **Extract from National Model Design Code & Guidance Part 1, 3A Guidance for Area Types (page 20) Built Form, Para 52**
- ii) Plot ratio:** Calculated by dividing the gross floor area of the building by the area of the plot, plot ratios along with site coverage should be used alongside good urban design principles **to regulate the density** of mixed-use and non-residential uses (example below) See B.1.i Density
- Town Centres: Plot Ratio >2
 - Urban Neighbourhoods: Plot Ratio >1
 - **Suburbs: Plot Ratio <0.5**
- 7.11.3 Therefore, for this application, the **Floor Area Ratio** is **922.04/1400** (both in m²) which is **0.6586** i.e., greater than **0.5** by **0.1586** i.e., a **31.72%** increase above the **maximum Design Code** recommended. This is another indication of the proposal exceeding the available '**Site Capacity**' for the **Area Type Setting** as defined by the **National Model Design Code & Guidance**.



8 Residential Density and Supporting Infrastructure

- 8.1 It is People that require supporting infrastructure such as GP Surgeries, Health Facilities, Schools and Transport Accessibility. The Housing Units require the physical infrastructure of utility services, Gas, Electric, Water Supply & Sewers.
- 8.2 The provision of Public Transport Accessibility Level is available from the TfL WebCAT in the form of PTAL 8 and provides an opportunity to assess the relationship between the PTAL measure of infrastructure and density, Densityfication or Intensification.
- 8.3 The distribution over the Area Type Setting Ranges should reflect the level of provision of supporting infrastructure where the lowest level of support is at the lower of the Density Range and the highest infrastructure support at the highest Density levels as illustrated below. The appropriate Residential Density in bedspaces/ha, Guidance at each incremental increase of PTAL is illustrated below.

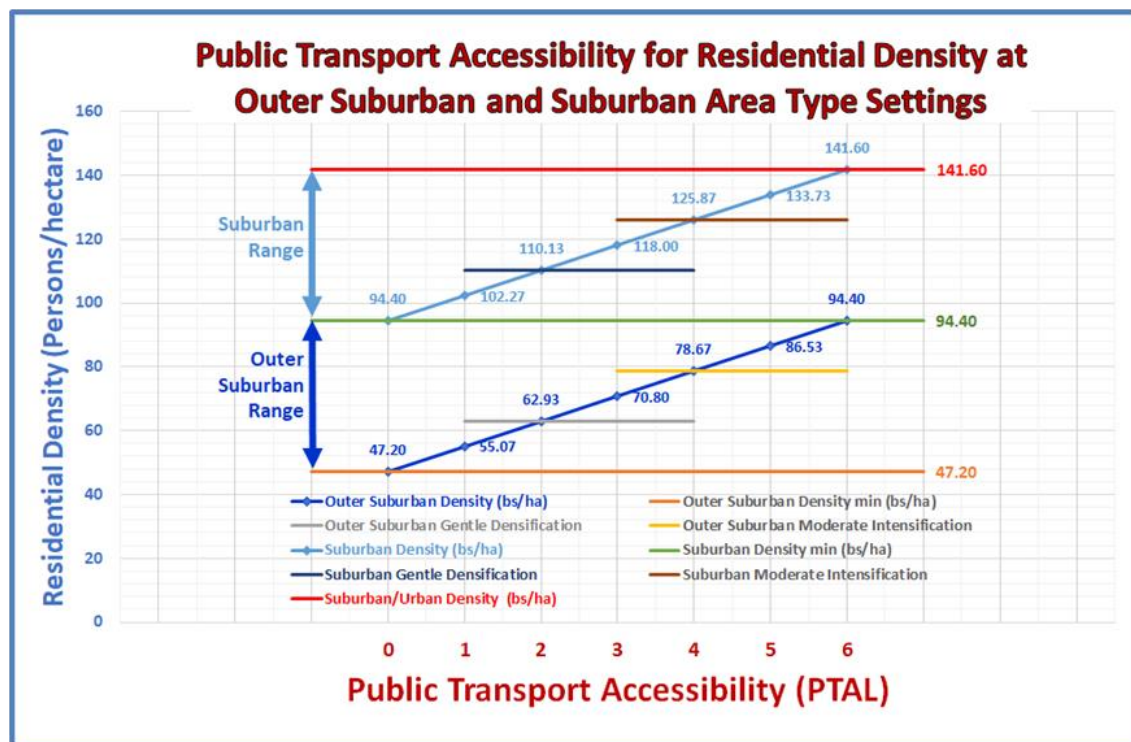


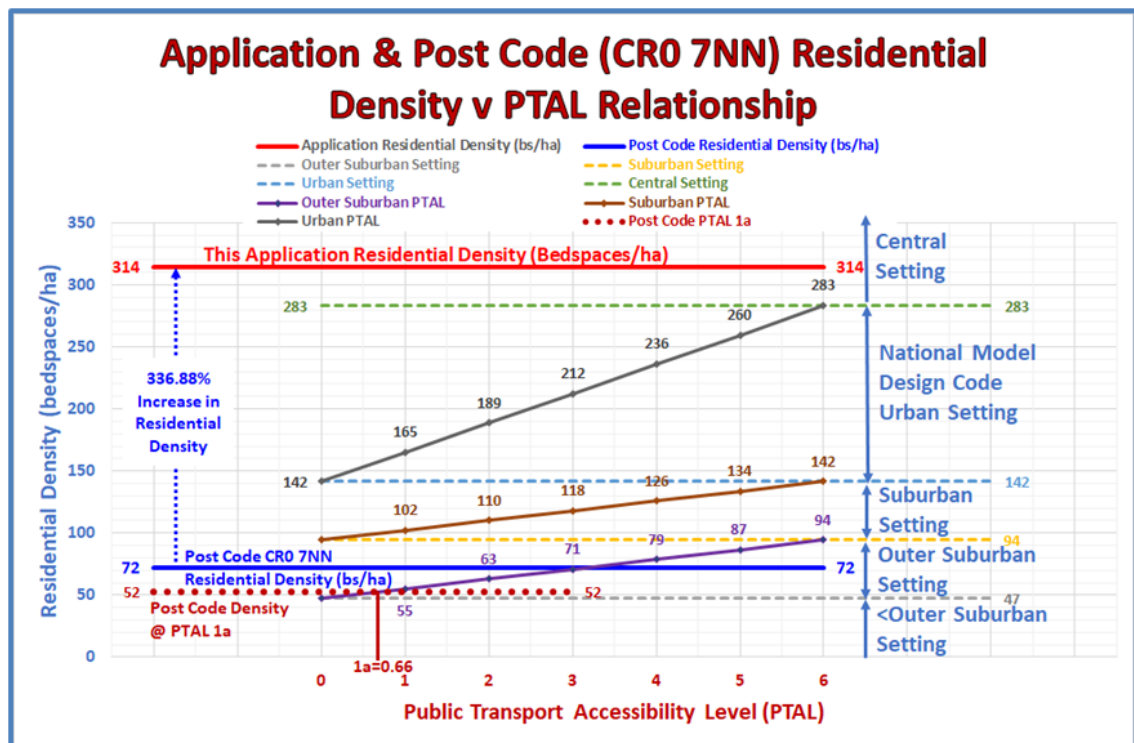
Illustration of distribution of Public Transport Accessibility Level across the Area Type Setting Ranges for “Outer Suburban” and Suburban

- 8.4 This should also correspond to the level of allowed “Densityfication” or “Intensification” to ensure sustainable infrastructure support.
- 8.5 The Level of Supporting Public Transport Accessibility (PTAL) across the Area Type Setting from PTAL Zero to PTAL Max (6) and the suggested levels of Densityfication/Intensification are shown in the following graphical illustration.
- 8.6 The graphical illustration below provides the **Residential Density v PTAL** comparison between the offered Residential Density and the accepted appropriate Residential Density for the Local Area Type Setting as defined by the Local Post Code and the

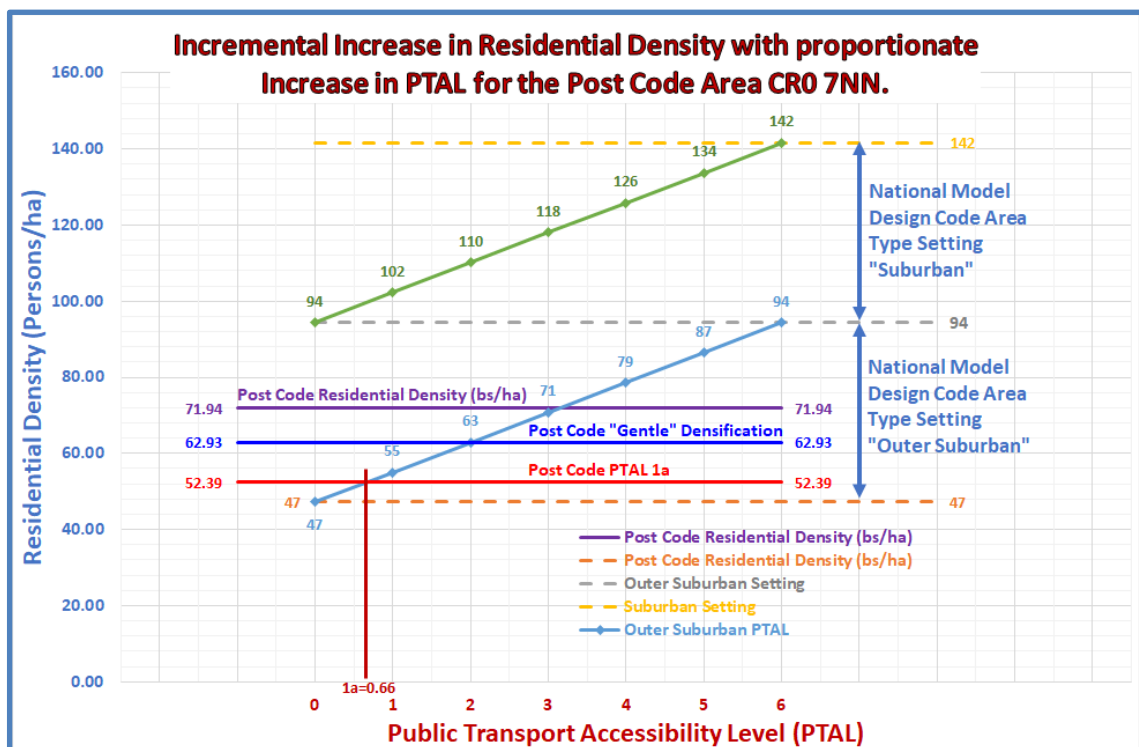
⁸ <https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcat/webcat>



second Graphical illustration shows the Residential Density v PTAL relationship for an outer suburban setting in more detail.



Graphical Illustrations of the proposed Residential Density in relation to that of the Post Code and Area Type Setting



Graphical Illustration of Post Code Residential Density v PTAL appropriate for the Setting



- 8.7 For this proposal, the **PTAL** for an **Outer Suburban “Gentle”** **Densification** should be **≈62.93bedspaces/ha** (persons/ha). The **Post Code Residential Density** for this locality **CR0 7NN** is **71.94bs/ha (≈72)** but the actual proposal **Residential Density** is **314.29bs/ha**, an enormous **336.88%** increase on the **Post Code Density** for the **Area**; i.e., this density would be more appropriate in a **“Central”** **Area Type Setting**, than an **“Outer Suburban”** **Area Type Setting**. The appropriate **Post Code Density** for **PTAL** at **1a ≡ 0.66** would be **52.39bs/ha (≈52)**, increasing to **62.93bs/ha** for **“Gentle”** densification. This is a further indication of significant over development for the **Site Area** and the **Area Type Setting** as defined by the **National Model Design Code & Guidance**.

9 Privacy & Overlooking

- 9.1 The **London Plan Housing Supplementary Planning Guidance (SPG)** at **Standard 28** states – *“Design proposals should demonstrate how habitable rooms within each dwelling are provided with an adequate level of privacy in relation to neighbouring property, the street and other public spaces”*, which is further clarified at:
- 2.3.36 design and access statements should demonstrate how the design as a whole uses a variety of measures to provide adequate visual and acoustic privacy for every home in a development. ... In the past, planning guidance for privacy has been concerned with achieving visual separation between dwellings by setting a minimum distance of 18 – 21m between facing homes (between habitable room and habitable room as opposed to between balconies or terraces or between habitable rooms and balconies/terraces). these can still be useful yardsticks for visual privacy but adhering rigidly to these measures can limit the variety of urban spaces and housing types in the city and can sometimes unnecessarily restrict density. it will often be beneficial to provide a set-back or buffer where habitable rooms directly face a public thoroughfare, street, lane or access deck.*
- 9.2 Assuming the new footpath (minimum 1.5m) does not reduce the width of Sloane Walk roadway, the distance from the far (Northern) kerb of Sloane Walk to the building edge of **26/30 Albany/Belgrave Courts** using Google Earth shows a separation of **≈8.50 metres**. Thus, this would place the front of **Unit 5** approximately **8.5 + 1.5 + 1 ≈11m** from **30 Albany/Belgrave Court**.
- 9.3 The Google Earth Street view of **26/30 Albany/Belgrave Courts** show a small window at ground floor level and a larger window at presumably first floor level. It has been established that the window at first floor level serves a bedroom i.e., a habitable room.
- 9.4 Therefore, as there is minimal set-back, the **first floor** and **Dormer Windows** of the proposed development at **Plots 5 and 6** serving bedrooms are **<18metre** line of sight virtually direct horizontally with the bedrooms of **26 & 30 Albany/Belgrave Courts**.
- 9.5 Therefore, the proposal fails this **Privacy and Overlooking London Plan SPG Guidance** as the horizontal separation is **≈ 11metres** i.e., significantly less than the **18 metres** recommended. In addition, Plot 4 although set back from Sloane Walk by ≈6m is 17m which also fails the recommended spacing from the facing habitable (bedroom) of 26 Albany Court.



10 Design Policies and Space Standards

- 10.1 The proposal does not follow the same Building Line throughout the development.
- 10.2 There is No indication of the Width of the public footpath to meet Public Realm Requirements and there is no indication of “Dropped Kerbs” and “Sight Lines” for vehicles’ access to the parking bays and the crossover of the public footpath.
- 10.3 The proposal’s supplied drawings and Design and Access Statement does not indicate any compliance with Planning Policies. The applicant’s proposal does NOT provide any evidence of meeting **London Plan Policy D3** with respect to the “**Design-Led Approach**” or optimising the development within the “**Site Capacity**”.
- 10.4 There is no indication on the supplied Plans, how the proposal meets the minimum **In-Build Storage** Requirements as defined in the London Plan Policy Table 3.1
- 10.5 There is NO reference to **Electric Vehicle Charging (EVC) Points** for any of the Parking Bays.
- 10.6 There is **overlooking and invasion of privacy** of the **Dining Areas** of **Units 5, 6, 7 & 8** from the **Sloane Walk footpath** at where the footpath is **>1m** from the Dwelling and Dining area windows. This is an extremely poor design feature.
- 10.7 The access to the rear gardens of **Units 2 & 3, 4 & 5, 6 & 7** are shared (Joint ownership) and the boundary presumably passes down the centre of the shared access pathway. Therefore, the ongoing maintenance of these access pathways will be the joint responsibility of the freeholders or leaseholders of these dwellings. This is further evidence that the Site Capacity is inadequate to meet the requirements.
- 10.8 As mentioned in **Paras 2.6** above, the boundaries to the frontages of **Units 3 & 4** are not defined and **Unit 5’s Parking space** is located on the **forecourt of Unit 4** and **probably within the titled ownership of Unit 4**. This is completely **unacceptable**.
- 10.9 The **Croydon Local Plan 2018**, the Croydon Revised Local Plan and the London Plan all require **1.5 Car Parking Spaces per dwelling of 3 Bedrooms or more** at **Outer London PTALs of 1a** which totals **12 Spaces** required for the proposed **8 Dwellings**. The unsuitable parking arrangements are therefore another example that the Site has insufficient capacity to accommodate these required Parking provisions in an acceptable configuration.

11 Housing Need

- 11.1 The allocation of housing “**need**” assessed for the “**Shirley Place**” [770ha] over the period **2019 to 2039** is **278** (See Croydon Revised Local Plan ⁹ 2021 **Table 3.1**). This equates to **≈14 dwellings per year**. In relation to meeting housing “**need**” we raised a Freedom of Information (FOI) request **Ref: 4250621** on **31st January 2022** on the **Outturn** of Developments since **2018** for the **Shirley “Place”** plus the **Area, Housing** and **Occupancy** of the **Shirley Place** for which the response is as follows:

⁹ <https://www.croydon.gov.uk/sites/default/files/2022-01/croydon-local-plan-2018-revised-2021-part-1-start-to-section-11.pdf>



- 11.3 The FOI response indicated, the **Shirley "Place"** as defined in the Local Plan has an area of **approximately ≈770 ha** (i.e., The LPA has no idea of the Areas of the "Places" of Croydon) 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 **Shirley Ward**".

The statement of equivalence of the Sum of the Wards equals the Area of the "Place" is 'NOT True' as described later.

- 11.4 Analysis of this limited information (FOI response) supports our assumption that completions are recorded but **NOT** against the **"Places"** of Croydon and **no action** is taken by the **LPA** as a result of those completions. In addition, the **"Shirley Place" Area does NOT equate** to the sum of the **Shirley North & South Ward Areas**.

- 11.5 The FOI Response indicates:

- 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"**

- 11.6 Analysis of the recorded data shows that over the 'three' full years **2018** to end of **2020**, the **Net Increase in Dwellings for Shirley = Shirley North Ward + Shirley South Ward** = 55 + 102 + 69 = **226 ≈ 75 per yr**. However, this is NOT The Shirley "Place" at **≈770ha** but the net increase for the Shirley North [**327.90ha**] + Shirley South Wards [**387.30ha**] total of **715.20ha**, a difference of **54.8ha**.

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

Results of Freedom of Information (FOI) request Ref: 4250621 on 31st Jan 2022.

- 11.7 The **MORA Area** of **178.20ha** (which we monitor) is only **24.92%** of **All Shirley (715.2ha)**, but at a rate of **36dpa** over the **20yr** period **≈720 dwellings**, would exceed the **Target for the Shirley "Place" of 278** by **442 Dwellings** i.e., for the **'Whole' of the Shirley "Place."**
- 11.8 This is $|278 - 1257.5|/278 = 979.5/278 = 3.5234 = \mathbf{352.34\%}$ Increase for the **Shirley "Place"** estimate when the **MORA Area** is only $(770-178.2)/178.2 = \mathbf{23.15\%}$ of the area of the **estimated Shirley 'Place'** and $(178.26-715.2)/715.2 = \mathbf{24.92\%}$ of **all Shirley**.



- 11.9 ***This is definitely NOT respecting the character of the locality when the locality of this proposal is “Inappropriate for Incremental Intensification” with a PTAL of 2 and there is no probability for increase in supporting infrastructure.***
- 11.10 The **Build Rate Delivery** of dwellings over **3 years** for all **Shirley** is averaging at **55 + 102 + 69 = 226 Ave ≈ 75.33/yr. dwellings per year**, so over **20** years the **Net Increase** will be **≈1507 dwellings**. (Exceeding the **278 Target** by **≈1,229**). The Target for the Shirley **“Place”** at **Croydon Plan Table 3.1** of the Revised **Croydon Local Plan** indicates a Target of **278 dwellings over the period 2019 to 2039**.
- 11.11 This current rate (if retained) would exceed the Target over **20 yrs.** (of **278**) by $(507 - 278)/278 = 442.1\%$. 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 **≈54.8ha excess of land** which is in other adjacent Wards which numerically means the **Target for Shirley Wards of 278** should be reduced by **7.12% = 258** (and the difference of **20** added to the **Targets** of the relevant **adjacent Wards**). This rate (if retained) means that the number of developments would **significantly exceed** the available **supporting infrastructure** provision which has been acknowledged as unlikely to be improved over the life of the Plan.
- 11.12 It is therefore plainly obvious that the **inability to contain or mitigate the excessive outturns** above the stated **Targets** is a **significant failure** to meet the **legally required objectives** of **Sustainability¹⁰** as defined in the **NPPF Chapter 2. Achieving sustainable development¹¹** as Shirley has no prospect of **infrastructure improvement** over the **life of the Plan**. The **Sustainability of Developments** is a legal requirement of **development approvals** and thus could be **legally challenged**.
- 11.13 We are confident that **this analysis completely refutes** any suggestion that **“Housing Need”** is a reason for approval in this locality as the assessed **‘Housing Need’ for this area has already been satisfied**.
- 11.14 We challenge the use of **“Place” Targets** if those Targets for each Place are **NOT monitored** or if **deviating from the requirement**, there is no **mitigating action** to **manage those Targets within sustainable limits**.

12 NPPF (Changes for consultation 22nd Dec – 2nd Mar 2023)

- 12.1 The Department for Levelling Up, Housing & Communities have proposed significant changes to the National Planning Policy Framework (NPPF) relating to meeting Housing Need and have removed Top-Down Targets to Maintaining supply and delivery of new homes.
- 12.2 Although these Policy changes are for consultation, the emphasis on Targets has been changed to Locally defined Targets to meet the local defined Housing need.
- 12.3 This change in National Policy should reflect on the Local Planning Authority (LPA) local Targets and remove the pressure for densification or Intensification where

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

¹¹

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



previously set targets have been exceeded and Housing Need thus satisfied. All Development proposals should be judged on compliance to adopted Planning Policies and NOT on the basis of meeting Targets to support a Housing “need” especially so if that “need” has already been met or the developments are unsustainable with current supporting infrastructure.

13 Conclusion & Recommendations

- 13.1 The applicant has not addressed the fundamental reasons for refusals or appeals dismissal of previous similar applications and therefore this new application should be refused for the reasons as set out in this submission.
- 13.2 It is recommended that the case officer makes an appropriate indication that the configuration proposed is totally flawed and that any new proposal should completely reassess the appropriate configuration for the site and be within the Site Area Capacity limitation for the Area Type Setting. The proposal is a significant over-development for the Site Capacity and Housing Targets for the locality have been significantly exceeded and therefore Housing “Need” for the locality has already been met.
- 13.3 If this proposal is allowed, it would mean that **ALL** the Policies referenced and quoted in our submission had been disregarded, making a mockery of the Policies and Procedures thus adding to the total loss of confidence by Residents in the Planning Process and the Management of Development proposals by Croydon Local Planning Authority. In the event of the Croydon LPA or the Case Officer disputing our analysis of the proposed development, based upon the **National Model Design Code & Guidance**, we respectfully request that reasons are provided for NOT observing the **National Guidance** or values for **Area Type Settings**.
- 13.4 We have only objected on grounds of agreed **National & Local Policies** and in no case have we ‘*subjectively*’ assessed the proposal, we therefore **Urge the Case Officer to Refuse this Proposed Application** on the grounds of **non-compliance** to the **Planning Policies** as referenced in this submission. We therefore urge the **Case Officer to refuse** this proposed development on the grounds as set out in this submission based upon **current adopted and emerging National and Local Planning Policies**.

Kind Regards

Derek



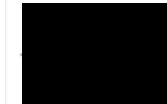
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Cc:

Sarah Jones MP
Sue Bennett
Richard Chatterjee
Mark Johnson

Bcc:

MORA Executive Committee, Local affected Residents & Interested Parties



Sony Nair
Chairman MORA
Email: chairman@mo-ra.co

Croydon Central
Cllr. Shirley North Ward
Cllr. Shirley North Ward
Cllr. Shirley North Ward