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**Monks Orchard Residents'
Association
Planning**

21st June 2023

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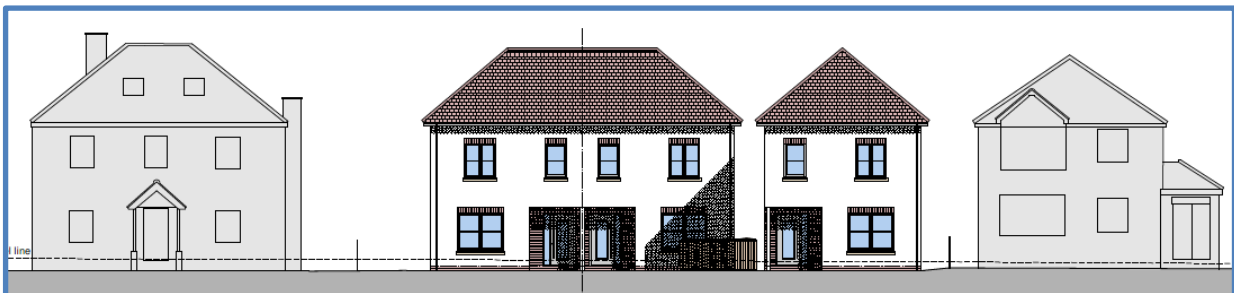
Reference: **23/02129/FUL**
Application Received: Wed 31 May 2023
Application Validated: Wed 31 May 2023
Address: 46 The Glade Croydon CR0 7QD
Proposal: Demolition of the existing bungalow and the erection of 3 no. two storey houses in the form of a 1 no. detached house and 1 no. semi-detached pair, each with private rear garden containing a cycle store, compost store, and landscaping with native species. 4 no. car parking spaces, waste storage, and soft landscaping will be provided to the front of the houses, with the existing dropped kerb modified to retain vehicular access.

Status: Awaiting decision
Consultation Expiry: Thu 29 Jun 2023
Determination: Wed 26 Jul 2023
Case Officer: Christopher Grace

Dear Mr Grace – Case Officer,

Please accept this letter as a formal comment to **Application Ref: 23/02129/FUL** for Demolition of the existing bungalow and the erection of 3 no. two storey houses in the form of a 1 no. detached house and 1 no. semi-detached pair, each with private rear garden containing a cycle store, compost store, and landscaping with native species. 4 no. car parking spaces, waste storage, and soft landscaping will be provided to the front of the houses, with the existing dropped kerb modified to retain vehicular access.

Proposal:



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

1 Planning History:

- 1.1 **Ref: 21/05741/FUL** | Demolition of a single storey dwelling and redevelopment with a new building to provide **9 dwellings** (Class C3), with associated amenity space, integral refuse, cycle stores and external car parking.
Permission Refused 3rd February 2022
Appeal Decided; 22/09/2022 Appeal Dismissed
- 1.2 **Ref: 22/01881/FUL** | Demolition of single storey dwelling at 46 The Glade and redevelopment with a new building to provide 8 dwellings (Class C3), with associated amenity space, integral refuse, cycle stores and external car parking.
Appeal Contested - (grounds of appeal) in respect of the Council's failure to determine planning application reference 22/01881/FUL within the statutory period.
Awaiting decision by the Planning Inspectorate.
- 1.3 **Ref: 22/03970/FUL** | Demolition of existing property and construction of 4 no. 3 bedroom houses with parking spaces.
Appeal Contested - (grounds of appeal) in respect of the Council's failure to determine planning application reference 22/01881/FUL within the statutory period.
Awaiting decision by the Planning Inspectorate.
- 1.4 **22/05049/FUL** | Demolition of existing property and construction of **2** no. 3 bedroom houses and **2** no. 2 bedroom houses with parking spaces.
Appeal Contested – 5th May 2023 (grounds of appeal) in respect of the Council's failure to determine planning application reference 22/01881/FUL within the statutory period.
LPA Refused proposal on 30 March 2023
Awaiting decision by the Planning Inspectorate.
- ### 1.5 Summary of History
- 1.5.1 This proposal is the fifth for this site, and each iteration has gradually reduced the Density of the proposal such that it is now nearer the ranges of the **local Area Type** as defined by the **National Model Design Code & Guidance** as **Outer Suburban**.
- 1.5.2 We understand the need for additional housing, but that new housing developments and Residential Extensions & Alterations must be **sustainable** and meet the current and emerging planning policies to ensure future occupants have acceptable living standards and acceptable accessibility to Infrastructure and Public Transport accessibility.
- 1.5.3 It is appreciated that this proposal is much improved on those previously submitted.
- 1.5.4 The proposal is assessed against the current adopted Planning Policies in a hierarchical level of weight and authority. It is becoming increasingly apparent that the **Croydon Local Plan** is becoming virtually irrelevant with the progress of new **Planning Guidance** and **Supplementary Planning Guidance** supporting documents at **national** and **London Plan** levels.

1.5.5 Planning Guidance:

- a) NPPF 2021
 - i. NPPF Referenced Supplementary Planning Guidance
 - ii. National Model Design Code & Guidance
- b) The London Plan (2021)
 - iii. The London Plan Supplementary Planning Guidance
 - iv. Optimising Site Capacity (Draft Feb 2022, adopted June 2023)
 - v. Housing Design Standards (Draft Feb 2022, adopted June 2023)
 - vi. Small Site Design Codes (Draft Feb 2022, adopted June 2023)
 - vii. Characterisation & Growth Strategy (Draft Feb 2022, adopted June 2023)
- c) The Croydon Plan (2018)
 - viii. The Croydon Plan Supplementary Planning Guidance Current Policies
 - ix. SPD2 (revoked June 2022)

2 Proposal's Parameters

46 The Glade			App Ref: 22/03970/FUL		Supplied Drawings		Floor Area Ratio		0.5035		Post Code		CR0 7QD	
Site Area	1020	sq.m.					Plot Area Ratio		0.2647		Area		1.5100	
App Form	0.102	ha	Bedrooms Density		88.24 b/ha						Persons		68 (persons)	
Units	3		Residential Density		117.65 bs/ha		PTAL		2011		Dwellings <td colspan="2">28 (Units)</td>		28 (Units)	
FAR	0.5035		Residential Density		176.47 hr/ha		PTAL		2021		Housing Density (U/ha)		18.5430	
PAR	0.2647		Housing Density		29.41 U/ha		PTAL		2031		Residential Density (bs/h)		45.0331	
			Ave Density/Unit		6.00 hr/Unit									
Unit	Type	Floor	Bedrooms (b)	Bed Spaces (bs)	Habitable Rooms (hr)	GIA (Offered)	GIA (Required)	GIA LPG Best Practice	In-Built Storage (Offered) (Note 1)	In-Built Storage (Required)	In-Built Storage LPG Best Practice	GEA (Note 2)	Amenity Space (Required)	Car Parking
Unit 1	Semi	Ground	0	0	2	76.1	90.00	100.00	0.0	2.50	3.00	90.00	132.48	1
	M4(2)	First	3	4	3	61.9			0.0					
	Loft	0	0	1	36.4	Not Stated								
Sub Totals			3	4	6	174.4	90.00	100.00	0.0	2.5	3.0	90.0	132.48	1
Unit 2	Semi	Ground	0	0	2	76.1	90.00	100.00	0.0	2.50	3.00	90.00	97.92	1
	M4(2)	First	3	4	3	61.9			0.0					
	Loft	0	0	1	36.4	Not Stated								
Sub Totals			3	4	6	174.4	90.00	100.00	0.0	2.5	3.0	90.0	97.92	1
Unit 3	Detached	Ground	0	0	2	76.2	90.00	100.00	0.0	2.50	3.00	90.00	132.00	1
	M4(2)	First	3	4	3	61.9			0.0					
	Loft	0	0	1	26.7	Not Stated								
Sub Totals			3	4	6	164.8	90.00	100.00	0.0	2.5	3.0	90.0	132.00	1
Grand Total			9	12	18	513.55	270	300	0	7.5	5	270	362.4	3

Note 1: Storage Space in Loft but not Built-in. Thus could assume same space as the stated GIA for loft Space.

Note 2: Gross External Area (GEA) approximation, as scaled off Site Layout Plan.

LPG = London Plan Guidance

3 Initial Comments and Observations

- 3.1 The applicant has improved the proposal significantly from previous applications for this site to overcome the previous excessive over developments for the **Site capacity** and is now more appropriate for the **Local Area Type** Setting and character, although the street facing elevations are extremely 'Bland', lacking any distinguishing fenestrations.
- 3.2 The Floor Plans do not indicate Bedroom **Areas** and without a '**Bar Scale**' indication on the relevant drawings it is not possible for interested parties to be able to scale-off the supplied drawing Full Elevation Front – Proposed - 38800750.pdf.

3.3 As the **Bedroom Areas** are not available, it is not possible to assess compliance with **London Plan Policy D6 Housing quality and standards** or as amended at **Supplementary Planning Guidance - Housing Design Standards Table 1A.1** with Best Practice guidance.

3.4 As far as can be determined, the proposal meets the **London Plan Policy D6 Minimum Space Standards** that can be assessed from the provided documentation, and some exceed the 'Best Practice' guidance.

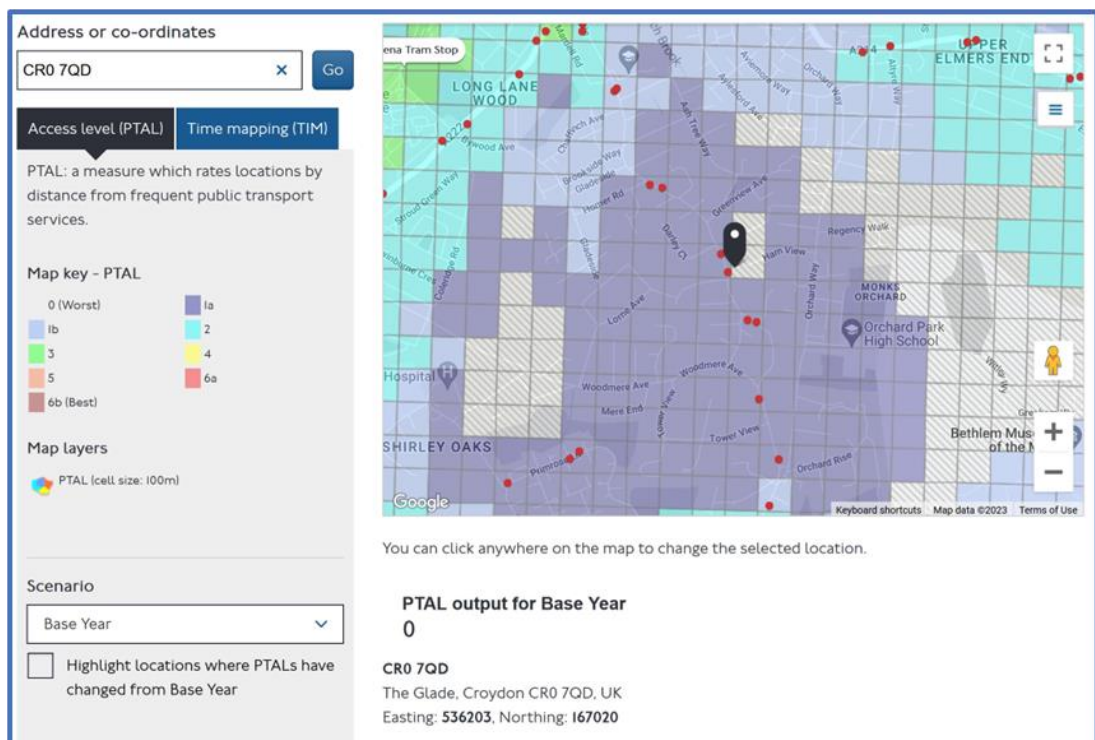
3.5 TfL WebCAT Public Transport Accessibility

3.5.1 It is again noted at the “**Vision**” **Transport Planning Report para 3.10 & 3.11** where the author indicates **Sites** are ranked between **PTALs 1 through 6** and the area of the proposal has **PTAL 1a**.

3.5.2 This is clearly **NOT** the case as the **TfL PTAL range¹** is between **0 (Zero)** and **6b**.

3.5.3 **The Author of the Transport Report** has also modified the searched request on the **TfL WebCAT** (as allowed and described on the display) to show **Easting 536194 & Northing 166994** Grid Cell **21572** as **PTAL 1a**.

3.5.4 The following is the unmodified return for a search of the **TfL WebCAT** for **Post Code CRO 7QD** which **clearly** returns a **PTAL of Zero (0)** with **Easting 536203** and **Northing 167020**



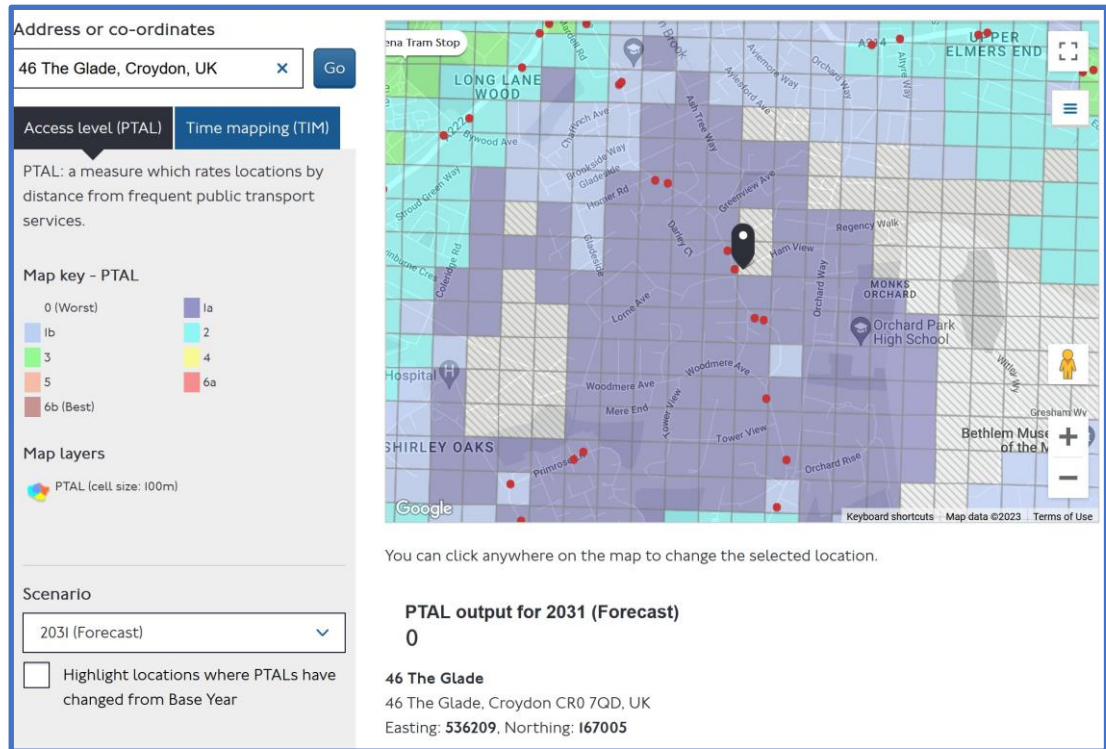
TfL WebCAT Search Result for Post Code CRO 7QD

¹ <https://content.tfl.gov.uk/connectivity-assessment-guide.pdf>



3.5.5

The following is the unmodified return for a search of the **TfL WebCAT** of the Address for **46 The Glade** which **clearly** returns a **PTAL of Zero (0)** with **Easting 536209** and **Northing 167005**. This is also the search for the **2031 forecast** which shows there is **no improvement to PTAL over the Life of the Plan**.



TfL WebCAT search results for 46 The Glade, Croydon Forecast to 2031.

3.5.6

Therefore, this conclusively proves that the **TfL WebCAT** search returns **PTAL Zero** whether search on **Post Code** or **Address**. On each search of the **TfL WebCAT**, either by **Address** or **Post Code** location returns a **PTAL Zero** with forecast to remain at **Zero** up to 2031.

3.5.7

The Author must have purposely manipulated and modified the search output for some reason and objective, probably to convince the reader of a higher Accessibility rating than would otherwise be displayed. This has definitely resulted in our **complete loss of confidence in the credibility and professionalism of the Transport Report, as it shows profound unprofessional BIAS.**

3.6 Floor Area Ratio (FAR)

3.6.1

The configuration of the dwellings on the site illustrates the inadequacy of the Capacity of the Site to accommodate all the requirements to support the development.

3.6.2

The proposal slightly exceeds the Recommended **Floor Area Ratio (FAR)** for **Suburban Area Types** at $GIA/ \text{Site Area (sq.m.)} = 513.55/1020 = 0.5035$ when the recommendation is to be **<0.5**. However, the proposal is in an **<Outer Suburban Area Type (Post Code CR0 7QD)** which is **two Area Type bands** lower than a **Suburban Area Type** viz: **Suburban & Outer Suburban** to a **<Outer Suburban Area Type**.



3.6.3 Thus, the **Floor Area Ratio** should be reduced proportionately accordingly to reflect a lower benchmark for the **Area Type Setting**.

3.6.4 **The National Model Design Code Part 1 states at Built Type 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 ... (example below) **See B.1.i Density.**

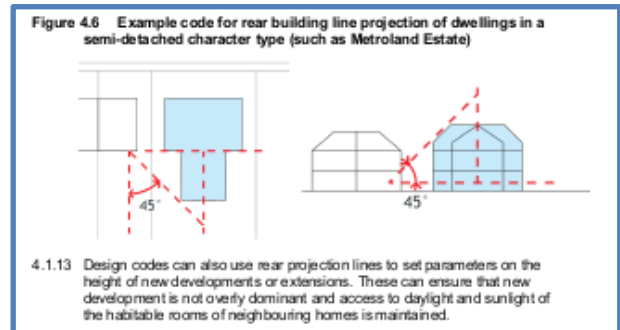
- **Town Centres: Plot Ratio >2**
- **Urban Neighbourhoods: Plot Ratio >1**
- **Suburbs: Plot Ratio <0.5 (Suburban)**
- **Outer Suburban <0.375**
- **<Outer Suburban <0.25**

National Model Design Codes					
Area Type	Town	Urban	Suburban	Outer Suburban	<Outer Suburban
Density	>120 Units/ha	<120 to >60 Units/ha	<60 to >40 Units /ha	<40 to >20 Units/ha	<20Units/ha
Plot Ratio (GIA/Site Area)	2	1	0.5	0.375	0.25

3.6.5 **A projected extrapolation seems a reasonable assessment for Outer Suburban Plot Ratio would be 75% (0.375) and for <Outer Suburban at 50% (0.25) of the Suburban Plot Ratios for Outer Suburban and <Outer Suburban Area Types respectively.**

3.7 Privacy and Overlooking - Neighbour Amenity

3.7.1 It is recognised that Supplementary Planning Guidance **SPD2** has been revoked but that the **London Plan SPG Small Site Design Codes** (Draft Feb 2022 adopted **June 2023**) at **Figure 4.6** prevails as an emerging and now **adopted** Policy.



3.7.2 The proposed separation between **Units 2 & 3** will not meet the **45° Vertical Rule projection** from the centre of nearest ground floor windows of the proposals even though they are virtually full width Patio windows. **Units 2 & 3** are too close together.



Rear Elevation indicating the separation between the proposed Semi-detached and Detached dwelling is inadequate and fails the Policy.



- 3.7.3 The proposed development therefore **fails** the **45°** (Vertical) projection from both **Units 2 & 3 and Unit 3** with the adjacent existing dwelling at **44 The Glade**. We do not have a rear elevation of **44 The Glade** and therefore our estimate is very generous being from the centre of the ground floor which still fails the policy. This is further evidence of over development.
- 3.8 Parking, Refuse Bins and Front Forecourt**
- 3.8.1 The Car parking provision is exceedingly low with respect to the **Low PTAL (Zero) Outer London Suburban** locality of the proposed development.
- 3.8.2 The **London Plan Residential Parking Policy T6.1 Residential parking - Table 10.3** indicates provision at **Outer London** and **PTAL 0 to 1** as **1.5 spaces per dwelling**, which equates to **4.5 spaces**, rounded to **5 spaces** for this proposal and only **3 spaces** are provided. This provides further evidence of over development of the **site capacity** as there is insufficient area to configure the proposal and allow for the full recommended number of parking spaces. This is a $(5-3)/5 = 0.4 = 40\%$ **decrease** in recommended provision.
- 3.8.3 **Parking Bays #1** is positioned adjacent to **Unit 1** and would block reasonable access to the rear amenity space from the front of the development especially for the transfer of gardening maintenance equipment to the rear garden of **Unit 1**.
- 3.8.4 The **Design and Access Statement** gives no indication on **Tenure**, whether the development is to be for private ownership or leasehold rented tenancy. As the forecourt is not partitioned logically within the projected boundaries of the Units (Dwellings) there is no ownership responsibility for maintenance of the forecourts or vegetation if privately owned as the forecourt is not partitioned.
- 3.8.5 **Parking Bay#2** is laterally in the front of **Unit 2**, but **Parking Bay #3** is also displaced and separated by a footpath access, but again laterally in front of **Unit 2**. If the properties are privately owned, **Parking Bay #3** would generally be considered to be within the ownership boundary of **Unit 2**. **This configuration is further evidence of over development.**
- 3.8.6 The **Refuse & Recycling Bin Store's** for **Unit 2** are **≈2m** in front of **Unit 2's Dining room window**. This is **hygienically unacceptable**. The position is likely to cause percolation of smells and attract airborne insects when the dining room window needs to be open for ventilation in periods of pleasant weather or high temperatures.
- 3.8.7 These issues all contribute to an overdeveloped of the site as there is extremely limited scope for adjustment to fulfil all the requirements of the development on the available **Site Capacity**.
- 3.8.8 There are no Swept Path illustrations to assess the manoeuvrability of vehicles entering and exiting the site and parking spaces (with all other spaces occupied).

4 Area Type Design Code assessment & Site Capacity

4.1 The Croydon Local Plan (2018)

4.1.1 Neither the **Croydon Local Plan (2018)** Nor the revised Draft Croydon Plan, provide any guidance on the assessment of local **Area Type Design Code Assessment**.

4.2 London Plan

4.2.1 The **London Plan at Policy D3 – Optimising Site Capacity through the Design Led Approach** recognises the need for '**Design Codes**' but does NOT give any guidance or methodology on how that should be achieved.

4.2.2 The **London Plan Supplementary Planning Guidance LPG Optimising Site Capacity through the Design led Approach** has been subject to consultation (Feb 2022) and recently adopted which provides significant guidance on **Area Type** definitions and the determination of **Site Capacities**.

4.3 The NPPF

4.3.1 The **National Planning Policy Framework (NPPF)** provides guidance by referencing out to documents produced by the **Department for Levelling Up, Housing & Communities (DLUHC)** vis: the **National Model Design Code and Guidance**. Published 2021.

4.3.2 NPPF Para 129

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.**

4.4 The National Model Design Code & Guidance² Parts 1 & 2.

4.4.1 The '**Settings**', '**Outer Suburban**', '**Suburban**', '**Urban**' and '**Central**' are defined in the **National Model Design Code** Part 1 The Coding Process, 2B Coding Plan, Figure 10 Page 14.

4.5 Local Design Code Assessment

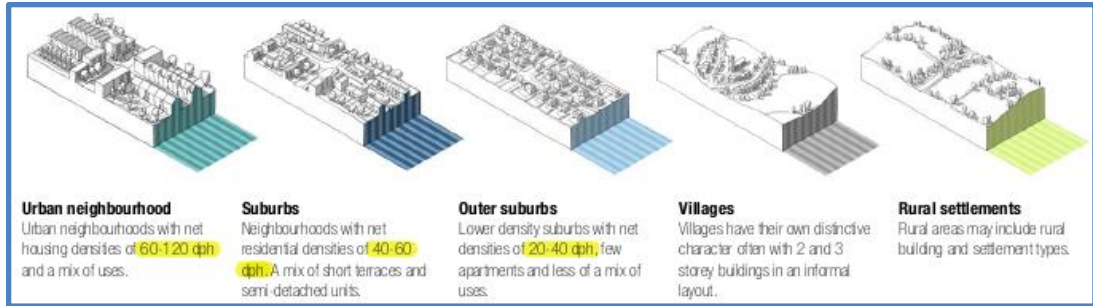
4.5.1 The **Local Design Code** assessment requires an analysis of a suitable area which describes the character of the locality. The most suitable for this assessment is the area of the local **Post Code CR0 7QD** of the proposed development.

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



4.5.2

The National Model Design Code parameters Definitions for Local Settings.



National Model Design Code parameters Definitions for Local Settings

4.6 Post Code Area Type and Design Code Assessment

4.6.1 Post Code Design Codes Assessment

4.6.2 The **Post Code CR0 7QD** covers an area of **1.51ha** as measured approximately by Google Earth (see above). The **Valuation Office Agency³** (VOA) indicates the Post Code has **28 Dwellings** and the **Post Code Area Data⁴** Indicates occupancy of **68 persons**, giving a **Local Design Code Housing Density** of $28/1.51 \approx 18.54U/ha$ and a **Residential Density** of $68/1.51 \approx 45.03person/ha$ which clearly places the local **Design Code** in an **<Outer Suburban Area Type Setting**.



Post Code CRO 7QD ≈ Area in hectares as measured using Google Earth.

³ <https://www.gov.uk/government/organisations/valuation-office-agency>

⁴ <https://www.postcodearea.co.uk/>



Parameters of Post Code 'CR0 7QD' Design Code				
Area Design Code Parameter	Input Parameters		Constrains	
<small>(These parameters auto calc Design Code)</small>				
Post Code (*)	CR0 7QD		Ward	Shirley North
Area of Post Code (ha)	1.51	hectares	Flood Risks	30yr Surface
Area of Post Code (Sq.m)	15100	sq.m.	Gas	Low Pressure
Number of Dwellings (Units) 25/11/2022	28	Units	Water	N/A
Number of Occupants (Persons) 25/11/2022	68	Persons	Sewage	N/A
Occupancy	2.43	Person/dwelling	HASL (m)	Average 55m
Post Code Housing Density	18.54	Units/ha	Building Line Set-Back	Various
Post Code Residential Density	45.03	Bedspaces/ha	Set-back Guidance	3 to 6m
Area Type (National Model Design Code)	<Outer Suburban	Setting		
(*) Last updated on 22 March 2023				
https://www.postcodearea.co.uk/				
Design Code Parameters		Min	Max	Measure
Area Type Setting (NMDC)	<Outer Suburban	0	20	Units/ha Range
Equivalent ¹ Residential Density (Persons/ha)	<Outer Suburban	0.00	47.20	Persons/ha Range
¹ Based upon National Occupancy Rates				
	<Outer Suburban	<Outer Suburban		
	U/ha	bs/ha		
PTAL (now)	0.00	20.00	47.20	Limits for PTAL
PTAL (forecast 2031)	0.00	20.00	47.20	Limits for PTAL
Gentle Intensification (Limits in U/ha & bedspaces/ha)		6.67	15.73	Limits 'Gentle' Intensification
Moderate Intensification (Limits in U/ha & bedspaces/ha)		13.33	31.47	Limits 'Moderate' Intensification
Focussed Intensification (Limits in U/ha & bedspaces/ha)		20.00	47.20	Limits 'Focussed' Intensification

Parameters required to assess the Post Code Design Codes

4.7 Application Area Type & Design Code Assessment

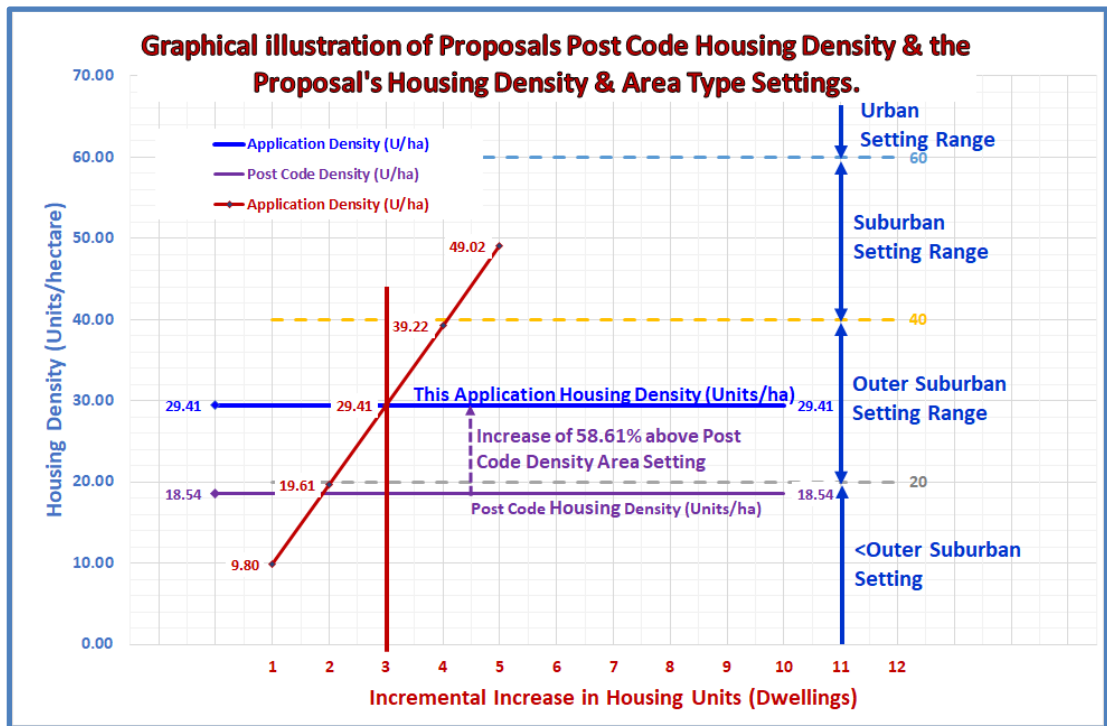
4.7.1 The assessment of the proposed development at **46 The Glade** illustrates a **Design Code Housing Density** of **3 Units** on a site Area of **0.1020ha** equates to a **Housing Density** of **29.41U/ha** requirement which places the required **Area Type** to be an **Outer Suburban Area Type Setting**.

Application Details			
Application Ref:	22/03970/FUL		
Address:	46 The Glade		
PostCode:	CR0 7QD		
LPA Consultation Close	Fri 07 Oct 2022		
Application Parameters			
Site Area (ha)	0.1020	ha	
Site Area (sq.m.)	1020.00	sq.m.	
Units (Dwellings)	3.00	Units	
Bedrooms	9.00	Bedrooms	
Bedspaces	12.00	Persons	
Housing Density	29.41	Units/ha	
Residential Density	117.65	bs/ha	
Occupancy	4.00	bs/unit	
Gross Internal Area (GIA) offered	513.55	sq.m.	
Floor Area Ratio	0.50	#	
		Min	Max
Area Type Setting (Units/ha)	Outer Suburban	20.00	40.00
Area Type Setting (Bedspaces/ha)	Suburban	94.40	141.60
		U/ha	bs/ha
PTAL (Current)	0.00	20.00	47.20
PTAL (Forecast)	0.00	20.00	47.20
PTAL Required (Urban)	1.79		

Interactive spreadsheet with Application parameters input to determine Design Codes

4.7.2 If the assessment of **Residential Density** is based upon a conversion from **Housing Density** in accordance with the **National Unit Occupancy**⁵ of **2.36** persons/unit, then the **Residential Density** at **117.65bedspaces/ha** would place this proposal's **Residential Density** in a **Suburban Area Type** Setting as defined by the **National Model Design Code and Guidance**.

4.7.3 **Graphical illustration of Housing Density**



Graphical Illustration of Housing Density of proposal and Post Code Area Type Settings

4.7.4 Future occupants of the proposed development would require Public Transport Accessibility commensurate with the Residential Density of the proposal. Based upon the National Occupancy of 2.36 Persons per Unit the Occupancy of the proposal is **4 person/unit** at a **Residential Density** of **117.65bs/ha**.

4.7.5 With the omission of the **Density Matrix** from the **London Plan**, there is now no methodology to relate **PTAL** to **Density** or **Area Types**. It is assumed the Accessibility to Public Transport increases proportionately with increased Residential Density irrespective of **Area Type** and therefore we are assuming the PTAL should increase linearly from TfL **PTAL Zero** at the low range of **Outer Suburban** to **PTAL 6** at the Low range of **Central Density** as shown on the graphical illustration below.

The approximate **PTAL** required for this proposal is given by:

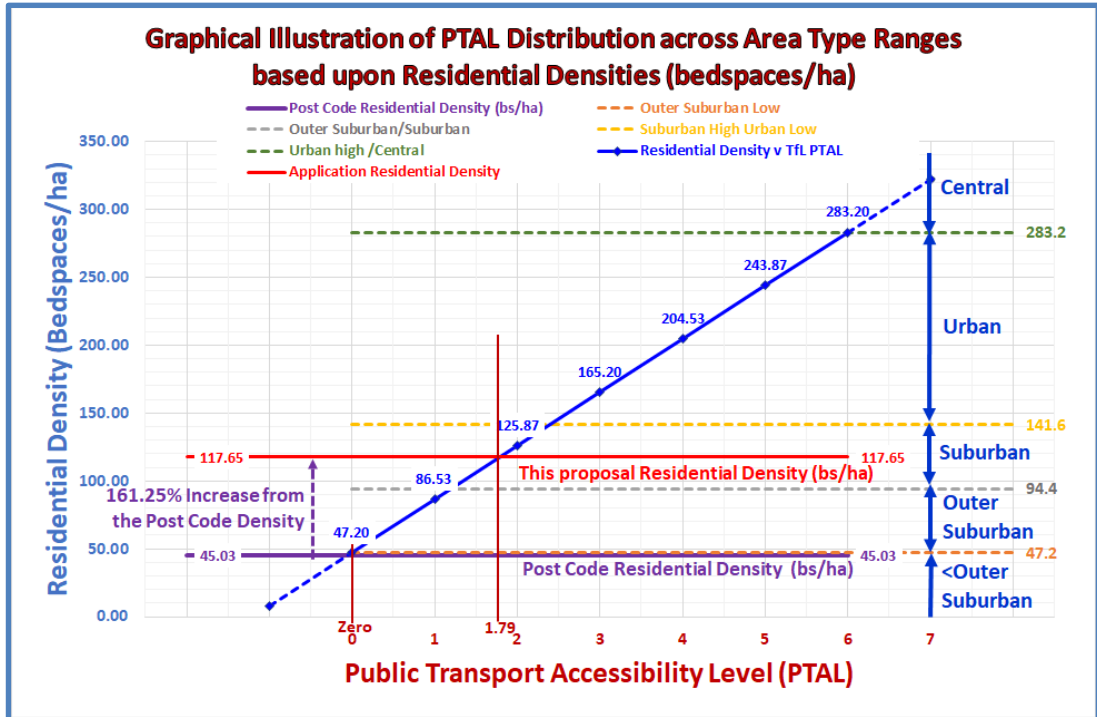
$y = mx + c$, where:

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

$$y = \text{Residential Density}; m = \frac{\delta y}{\delta x}; x = \text{PTAL} \ \& \ c = y \text{ when } x = 0$$

$$\therefore 117.65 = \left(\frac{283.2-47.2}{6}\right)x + 47.2 \quad \therefore x = \frac{117.65-47.2}{39.33} = 1.79 = \text{PTAL}$$

4.7.6 Residential Density v PTAL



Graphical Illustration of Residential Density against PTAL

4.8 Comparison - Post Code and Application Design Code Assessments.

4.8.1 The comparison between the Assessed **Post Code Area Type** and **Design Code** parameters with that of the proposal is the mechanism to test acceptability of the proposal to respect the character of the locality. The following interactive spreadsheet compares the proposal with the local area type parameters defined by the **Local Post Code**.

4.8.2 Comparison between Post Code and Proposal Design Code parameters.

Difference Between Post Code (CR0 7QD) Design Code & Application Proposal			
Post Code Housing Density (Units/ha)	18.54	Area Type Setting	<Outer Suburban
Application Housing Density (Units/ha)	29.41	Area Type Setting	Outer Suburban
Difference	10.87	#	
Percentage Difference (%)	45.33	%	
Percentage Increase (%)	58.61	%	
Post Code Residential Density (bs/ha)	45.03	Area Type Setting	<Outer Suburban
Application Residential Density (bs/ha)	117.65	Area Type Setting	Suburban
Difference	72.61	#	
Percentage Difference (%)	55.36	%	
Percentage Increase (%)	161.25	%	
PTAL Available	0.00	<Outer Suburban	
PTAL Required	1.79	Suburban	

Comparison between Post Code Area Type and proposal's parameters.

4.8.3 The proposal would present an increase in **Housing Density** from **18.54u/ha** to **29.41U/ha**, a **58.61%** increase from **<Outer Suburban** to **Outer Suburban Area Type** Setting. For **Residential Densities**, an increase from **45.03bs/ha** to **117.65bs/ha**, a **161.25%** increase from an **<Outer Suburban Area Type** through **Outer Suburban** to mid **Suburban Area Type** setting. These increases are significantly less than those offered by the previous refused (and appealed) proposals but still exceed the local **Design Code** Settings defined by the **Post Code CR0 7QD** in accordance with the **National Model Design Code & Guidance**.

5 Site Capacity.

5.1 **London Plan (2021) Policy D3 & LPG (2023) - Optimising Site Capacity through the Design-Led Approach⁶.**

5.1.1 Until we have assessed the usage of the London Plan Toolkit and its suitability with small, infill and redevelopments we assess the **Site Capacity** on the basis of the **Site Area** and the proposal's parameters as defined on the provided drawings and the capacity to meet the requirements of the proposal within the **Area Type** Limits as defined by the **National Model Design Code & Guidance**.

5.1.2 Using the guidance provided in the **National Model Design Code and Guidance** with the **Plot Area Ratio** recommendations and an assessment of required proposed accommodation facilities, we have assessed the required Site Area to support the proposed development of three dwellings for 12 occupants.

5.2 Area Type Site Capacity:

5.2.1 The location is **<Outer Suburban Area Type** as defined by the **Post Code CR0 7QD** locality and would therefore, for **three Units** (Dwellings) would require a **Site Area** equal or greater than **≥0.15hectares = ≥1500sq.m.** as defined within the limits of an **<Outer Suburban Area Type Setting**, whereas the actual **Site Area** is **0.102ha =1020 sq.m.** i.e., the **Site Area** is deficient by **480 sq.m.** to remain in an **<Outer Suburban Area Type Setting**.

5.2.2 The **National Model Design Code** suggests a **Floor Area Ratio (FAR)** of **≤0.5** for **Suburban Area Types** and which we have reasonably extrapolated for **Outer Suburban** and **<Outer Suburban** as **≈75%** and **≈50%** of **0.5** respectively which reflect the local character of the larger garden spaces in the surrounding locality.

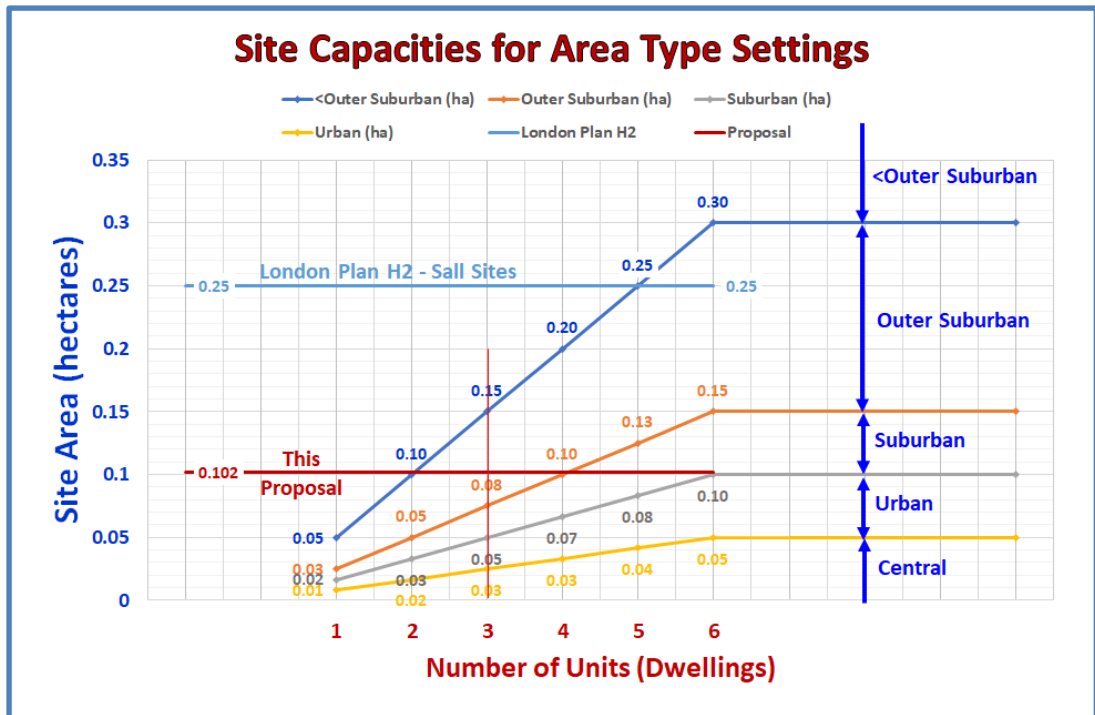
National Model Design Codes					
Area Type	Town	Urban	Suburban	Outer Suburban	<Outer Suburban
Density	>120 Units/ha	<120 to >60 Units/ha	<60 to >40 Units /ha	<40 to >20 Units/ha	<20Units/ha
Plot Ratio (GIA/Site Area)	≥2	≥1	≤0.5	≤0.375	≤0.25

5.2.3 Reducing the number of dwellings and therefore the **Gross Internal Area (GIA)** would provide the flexibility to provided proper arrangements for parking and other requirements with a proportionate reduction in occupants to meet the available **PTAL** provisions.

⁶ <https://www.london.gov.uk/publications/optimising-site-capacity-design-led-approach-lpg>

5.3 **The Proposal's Site Capacity.**

5.3.1 The Local Area Type is defined as **<Outer Suburban** by the **Post Code** assessment.



Site Capacity requirement for Area Types as defined by the National Model Design Code & Guidance

5.3.2 The graphical illustration above plots the **Site Area** against **Number of Dwellings** (Units) for the **Area Type** ranges as defined in the **National Model Design Code & Guidance**. The **Site locality** as defined by the **Post Code CR0 7QD** is clearly **<Outer Suburban**. It is quite clear that the proposed **three** dwellings are therefore in an **<Outer Suburban Area Type** setting which would require a **Site Area** of **≥ 0.15hectares** or **1500sq.m**.

5.3.3 **The proposal would be acceptable in an Outer Suburban Area Type Site Area** for three dwellings which would be **>0.15ha** and **<0.08ha** when the actual **Site Area** would be mid-way (0.102ha) between these two limits.

5.4 **The London Plan Supplementary Planning Guidance LPG Optimising Site Capacity.**

5.4.1 The **LPG Optimising Site Capacity** 'by the Design Led Approach', provides an Indicative **Site Capacity Toolkit** which is appropriate for major Site developments to assist in determining the indicative site capacity of residential developments. However, for Small Site developments it is suggested that **Boroughs, applicants and neighbourhood planning groups** may choose to use other digital design tools if preferred.



5.4.2 We have used an excel spreadsheet following the **LPG guidance** to provide an equivalent assessment for this proposal to provide guidance on the acceptability of the **Site Capacity** for this proposal using the principles outlined in the **Supplementary Planning Guidance**.

5.4.3 **Indicative Small Site Capacity Toolkit**

Indicative Small Site Capacity Calculator:														
Input Parameters														
Site Area (hectares)	Site Area (sq.m.)	GEA (Footprint)	Play Space per Child	Car Parking Standard (per space)	Parallel Parking (per space)	Car Park Standard with EVC (Per Space)	Car Parking (Disabled Bays) (Per Space)	Cycle Rack Storage (two bikes)	Refuse Eurobin (1280L) Storage (per Bin)	Refuse Eurobin (1100L) Storage (per Bin)	Refuse Eurobin (660L) Storage (per Bin)	Refuse Eurobin (360L) Storage (per Bin)	Refuse Eurobin (240L) Storage (per Bin)	Refuse Eurobin (180L) Storage (per Bin)
0.102	1020	270.00	10	12.5	12	14	18	1.71	1.25	1.23	0.90	0.53	0.53	0.43
Unit	Building Reg (M4(?))	Number of Storeys (#)	Bedrooms (b)	Bedspaces (bs)	GIA Required (Best Practice) (sq.m.)	In-built Storage (Best Practice) (sq.m.)	Private Amenity Space (Required) (sq.m.)	Probable Adults	Probable Children	Play Space Required (sq.m.)	Refuse Bin Storage	Cycle Storage	Car Parking (London Plan)	
1	M4(2)	3	3	4	100	3	7	2	2	20	1.49	13.68	18.75	
2	M4(2)	3	3	4	100	3	7	2	2	20	1.49	13.68	18.75	
3	M4(2)	3	3	4	100	3	7	2	2	20	1.49	13.68	18.75	
Totals			9	12	300	9	21	6	6	60	4.46	41.04	56.25	
Proposal	Footprint or GEA	Play Space	Private Amenity Space (Required) (sq.m.)	Communal Amenity Space (Required)	Parking Spaces (sq.m.)	Cycling Storage (sq.m.)	Refuse Bin Storage	Proposal Area covered (sq.m.)	Site Area (sq.m.)	Site Capacity Ratio (covered/Site Area)	Floor Area Ratio (GIA/Site Area)			
Totals	270.00	60.00	21.00	0.00	56.25	41.04	4.46	452.75	1020.00	0.44	0.29			
Assessment	Floor Area Ratio (Area Type)	Site Area available (sq.m.)	Area available for peripherals	Proposal Area covered (sq.m.)	± Site Capacity	% Site Capacity								
Urban	1	1020.00	1020	452.75	567.25	55.61%								
Suburban	0.5	1020.00	510	452.75	57.25	5.61%								
Outer Suburban	0.375	1020.00	382.5	452.75	-70.25	-6.89%								
<Outer Suburban	0.25	1020.00	255	452.75	-197.75	-19.39%								

5.4.4 The above assessment provides the acceptable **Site Capacity** if the proposal were within an **Urban** Area Type would be within of the **Optimised Site Capacity** at **+55.61%**, in a **Suburban** Area Type within **+5.61%** of the **Optimised Site Capacity**. However, if the proposal were in an **Outer Suburban** Area Type, it would be **-6.89% deficient** of the optimised **Site Capacity** and the actual location of the proposal which is in an **<Outer Suburban** Area Type as defined by the **Local Post Code CRO 7QD**, it would be **-19.39% deficient** of the **Optimised Site Capacity**. This is based upon an assessment of the projected **Floor Area Ratios** for the respective **Area Types** to reflect local character.

6 Growth, Densification & Intensification.

6.1 **Croydon Local Plan (2018) ‘Growth’ Policies**

6.1.1 The **Croydon Local Plan (2018) ‘Growth’** Policies, as defined in **Table 6.4**, ‘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**’ therefore, the Policy is ‘**unenforceable**’ and ‘**undeliverable**’ as it has no measurable methodology, is imprecise, indeterminate and devoid of any Policy definition.

6.1.2 **Evolution without significant change of area’s character**

6.58 There are existing residential areas which have the capacity to accommodate growth without significant impact on their character. In these locations new residential units can be created through the following interventions.

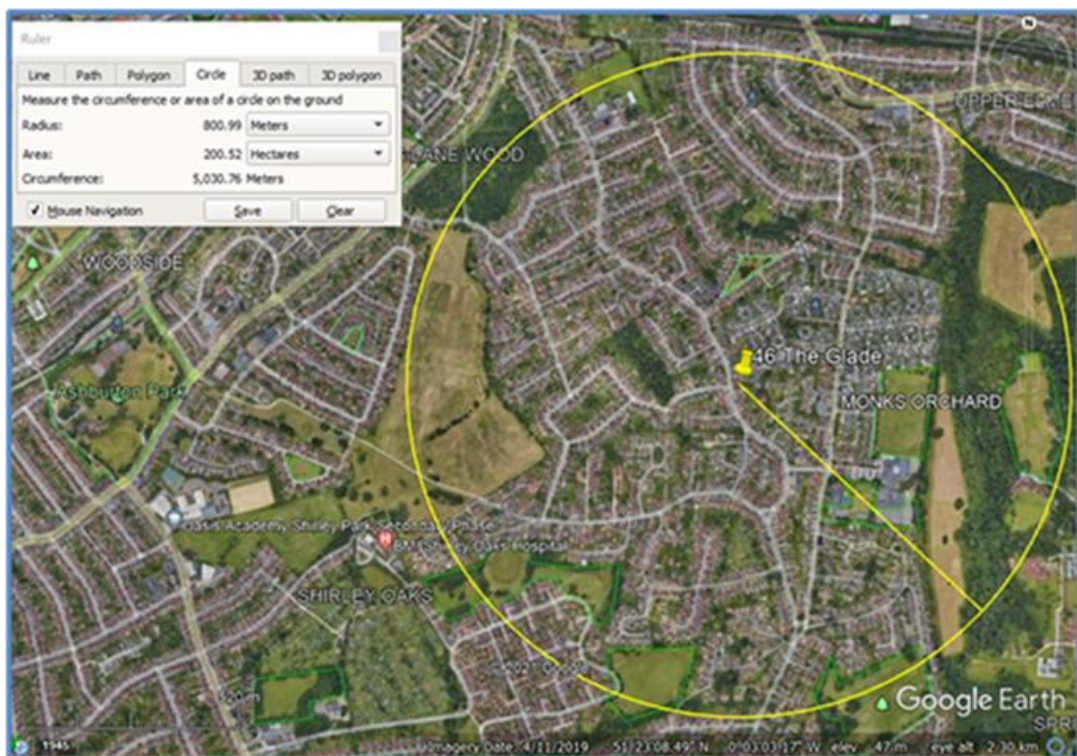
Representing, supporting and working with the local residents for a better community

- a) **Conversion** – The conversion or subdivision of large buildings into multiple dwellings without major alterations to the size of the building.
- b) **Addition** – This can include one or more extensions to the side, rear, front or on the roof, and is often combined with conversion of the existing building into flats.
- c) **In-fill including plot subdivision** – Filling in gaps and left over spaces between existing properties. It can also include subdivision of large plots of land into smaller parcels of land with a layout that complements the existing urban pattern.
- d) **Rear garden development** – The construction of new buildings in rear gardens of the existing properties. Houses must be subservient in scale to the main house.
- e) **Regeneration** – The replacement of the existing buildings (including the replacement of detached or semi-detached houses with flats) with a development that increases the density and massing, within the broad parameters of the existing local character reflected in the form of buildings and street scene in particular.

6.2 London Plan Policy H2 – Small Sites

6.2.1 The new London Plan Policy H2 at para 4.2.4 states:

*“4.2.4 Incremental intensification of existing residential areas within PTALs 3-6 or within 800m distance of a **station**⁷ or **town centre**⁸ boundary ...”*



Google Image of 800m radius from 46 The Glade showing that it is over 800m from Tram/Train Station and District Centre; Thus inappropriate for Incremental Intensification” London Plan Para 4.2.4.

⁷ Tube, rail, DLR or tram station.

⁸ District, major, metropolitan and international town centres.



6.2.2 **London Plan Policy H2 - Small Sites para 4.2.5 States:**

*“The small sites target represents a **small amount** of the potential for **intensification** in existing **residential areas**, particularly in **Outer London**, therefore, they should be treated as minimums. To proactively increase housing provision on small sites through ‘**incremental**’ development, Boroughs are encouraged to **prepare area-wide housing Design Codes**, in particular, for the following forms of development: **Residential Conversions, Redevelopments, extensions of houses and/or ancillary residential buildings.**”*

6.2.3 **46 The Glade** has a **PTAL of Zero** and is greater than **800m** from a **Tram/Train Station** or **District Centre** and as such is inappropriate for **incremental intensification**.

6.2.4 If the case officer is minded to recommend approval, we request **detailed ‘justification’** for allowing the proposed ‘**intensification**’ in terms of **Housing and Residential Density** for this proposal at this **Setting and PTAL Zero** in contradiction to the **London Plan Policy H2** at para 4.2.4 and the **London Plan Policy D3** and “**Design Code**” and the **Department for Levelling Up, Housing and Communities “National Model Design Code and Guidance”**.

7 Sustainability and Housing Need

7.1 NPPF Para 7 States:

7.1.1 *“The purpose of the planning system is to contribute to the achievement of **sustainable** development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own **needs**”⁹ “*

7.1.2 For **Sustainability**, developments require adequate **supporting infrastructure** but there is **NO planned improvement** in the provision or delivery of new improvements to the existing Infrastructure¹⁰ for **Shirley** over the life of the Plan.

7.2 Housing Need

7.2.1 The allocation of housing “**need**” assessed for the “**Shirley Place**” [770ha] over the period **2019 to 2039** is **278** (See Croydon Revised Local Plan¹¹ 2021 **Table 3.1**). This equates to **≈14 dwellings per year over 20 yrs**. In relation to meeting housing “**need**” we raised a Freedom of Information (FOI) request **Ref: 4250621** on **31st January 2022**. The FOI Requested data 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 Resolution 42/187 of the United Nations General Assembly

¹⁰ <https://www.croydon.gov.uk/sites/default/files/2022-01/infrastructure-delivery-plan-2021.pdf>

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



- 7.2.2 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 actual 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.’)**
- 7.2.3 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.**
- 7.2.4 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”**
- 7.2.5 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**.
- 7.2.6 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”**.
- 7.2.7 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**. Over the Full Four Years the estimate outturn is **1257 dwellings** (see completions analysis table below).
- 7.2.8 This is $|278 - 1257.5|/278 = 979.5/278 = 3.5234 = 352.34%$ Increase for the **Shirley “Place” estimate** when the **MORA Area** is only $(770-178.2)/178.2 = 23.15%$ of the area of the **estimated Shirley ‘Place’** and $(178.26-715.2)/715.2 = 24.92%$ of **all Shirley**. 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 1a** and there is no probability for increase in **supporting infrastructure**.

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 31st Jan 2022.

- 7.2.9 This current rate (if retained) would exceed the Target over **20 yrs.** (of **278**) at **1257.5** by: **Percentage of Increase** of $|128 - 1257.5|/128 = 1129.5/128 = 8.8242 = \mathbf{882.42\%}$. or a **Percentage Difference** of 128 and 1257.5 = $|128 - 1257.5|/((128 + 1257.5)/2) = 1129.5/692.75 = 1.63 = \mathbf{163\%}$.
- 7.2.10 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**).
- 7.2.11 This rate (if retained) would result in the number of developments **significantly exceeding** the available **supporting infrastructure** provision which has been acknowledged as unlikely to be improved over the life of the Plan.
- 7.2.12 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.**
- 7.2.13 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 Sustainability** as defined in the **NPPF Chapter 2. Achieving sustainable development¹²** as Shirley has no prospect of infrastructure improvement over the life of the Plan. The **Sustainability of Developments** is a **legal requirement¹³** of development approvals.
- 7.2.14 We challenge the use of **"Place"** Target if those **Targets** for each **"Place"** are **NOT monitored** or if deviating from the requirement, there is no mitigating action to manage those Targets to meet **"Sustainable Developments"**. It is our understanding that **Managing Developments** is the prime responsibility and the Job Description of the **LPA "Development Management"**. **All Development proposals**

¹²

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

¹³ <https://www.legislation.gov.uk/ukpga/2004/5/section/39>

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, and there are NO infrastructure improvements to support the surpassing of that “Need.”

8 Summary

- 8.1 This proposal is a significant improvement to the recent refused and Appealed proposals for this site, which is welcomed. However, there are still issues which prevent us from approving this proposal.
- 8.2 The Site is a normal rectangular configuration with an existing bungalow. There are no obvious impediments to the redevelopment of this site. However, the locality as defined by the **National Model Design Code and Guidance** as related to the **Post Code CR0 7QD** is of an **<Outer (London) Suburban Area Type (≤ 20Units/ha)** and additionally has a very Low **Public Transport Accessibility Level (PTAL) (Zero)** as defined by **TfL WebCAT**, whereas the **Housing Density** of the proposal would require the locality of the proposal to be **Outer (London) Suburban (≥40 to ≤60 Units/ha)** as defined by the **National Model Design Code & Guidance** and a **PTAL of ≈1.79**, if based on a linear incremental increasing distribution over the ranges of **PTAL** and **Residential Densities**.
- 8.3 The proposed separation between **Units 2 & 3** will not meet the **45° Vertical Rule projection** from the centre of nearest ground floor windows of the proposals even though they are virtually full width Patio windows. The projected 45° line from the centre of the ground floor (which is normally off Centre toward the adjacent dwelling) which gives greater allowance, still fails the 45° Degree projection which is significant proof of failure to meet the Policy. **Units 2 & 3** are definitely too close together.
- 8.4 In addition, the Applicant has shown the **45° Horizontal** projection from the centre of the **furthest** ground floor window instead of the **nearest** ground floor window of **11 Gladeside** which we have shown clearly intersects the **45° Horizontal projection** indicating loss of amenity to the occupant of **11 Gladeside** by both **Horizontal** and **Vertical** failure to meet the Policy.
- 8.5 The Parking provision is inadequate at the available **PTAL of Zero** and for the **three Units** would require 4.5 ≈5 (Integer) **spaces**, as required by **London Plan Policy T6.1 Residential parking - Table 10.3**, for ‘Outer’ London within **PTAL ranges 0 to 1**, when only **3 Parking bays** are provided. This is a **40% deficiency** in the appropriate parking provision for this proposal, which is unacceptable. Parking for Unit 1 will block or significantly reduce access to the rear garden area on Unit 1 and the Parking Space for **Unit 3** is on the forecourt of **Unit 2**.
- 8.6 The Refuse bins for **Unit 2** are much too close at ≈2m in front of **Unit 2’s Dining room window**. This is **hygienically unacceptable**. The position is likely to cause percolation of smells and attract airborne insects when the dining room window needs to be open for ventilation in periods of pleasant weather or high temperatures.

- 8.7 The proposal would present an increase in **Housing Density** from **18.54u/ha** to **29.41U/ha**, a **58.61%** increase from **<Outer Suburban** to **Outer Suburban Area Type** Setting and a commensurate increase in **Residential Densities**, from **45.03bs/ha** to **117.65bs/ha**, a **161.25%** increase from an **<Outer Suburban Area Type** through **Outer Suburban** to mid **Suburban Area Type** setting. These increases are significantly less than those offered by the previous refused (and appealed) proposals but still exceed the local **Design Code** Settings defined by the **Post Code** in accordance with the **National Model Design Code & Guidance**.
- 8.8 Although the **Floor Area Ratio (FAR)** is only slightly higher than the **<0.5 Benchmark** recommended for **"Suburban"** Areas, this proposal is in a **'less than'** **<Outer Suburban Area Type** Setting, two Settings lower than **"Suburban"** as defined by the **Post Code CR0 7QD** which would suggest a **lower benchmark ratio** commensurate with the local character ratio of the larger garden areas to build footprint. (GEA/Site Area).
- 8.9 We have **no confidence** in the **Vision Transport Assessment** as the author must have **purposely manipulated and modified** the **TfL WebCAT** search to show the **PTAL** to be **1a** when the interrogation for both the **Post Code (CR0 7QD)** and the address **46 The Glade** returns **PTAL Zero (0)**, to convince the reader of a higher **Accessibility Rating** than would otherwise be displayed. This has resulted in our **complete loss of confidence in the credibility and professionalism of the Transport Assessment Report, as it shows profound unprofessional BIAS which throws suspicion on other parameters that may have been manipulated to give a more positive assessment of the Transport facilities than are actually available.**
- 8.10 We are confident that **our analysis of 'Housing Need' 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.**

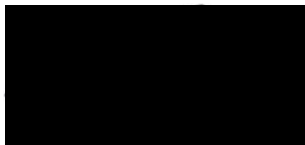
9 The Planning Process

- 9.1 The forgoing submission is compiled on the grounds of **National and Local Planning Policies** and we have based our assessment upon **rational observations and evaluation**. There have been no **vague or subjective assessments** and therefore we respectfully request that all our foregoing analysis and evidence is of a sound assessment and therefore extremely relevant to the final determination. The Croydon Local Plan (2018) is now 5 years out of date and is becoming irrelevant with the emergence of new **National and London Plan Guidance**.
- 9.2 Although this proposal is a significant improvement on previous proposals, it is disappointing that it remains an over development for the **Area Type Site Capacity** .
- 9.3 Local Residents have **"lost confidence in the Planning Process"** resultant on recent local **over-developments** and lack of additional supporting infrastructure, which, in the majority of cases, disregarded Planning Policies. Once that confidence is **lost**, it is extremely difficult to regain it.

- 9.4 Confidence and support of local residents is necessary to ensure the general requirement of housing '**need**' is supported and satisfied with the provision of appropriate sustainable developments. This can only be achieved by ensuring developments comply with the agreed **National and Local Planning Policies and Guidance to ensure development proposals are the "Right Type" and in the "Right Place"**.
- 9.5 We therefore urge the **LPA to refuse this application** and request the applicant to submit a revised proposal meeting the defined **National Model Design Code and Guidance** as published by the **Department for Levelling Up, Housing & Communities** (January & June 2021) **Build form Policies** for an **"Outer Suburban" Area Type Setting** as, from all assessment of the locality, the Shirley Wards (Both Shirley North & Shirley South Wards) are in every assessment either less than or equal to the Housing Density for an **Outer Suburban Area Type** Setting.
- 9.6 Please Register this representation as **Monks Orchard Residents' Association (Objects)** on the Public Access Register.

Kind regards

Derek



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Executive Committee – Planning
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Sony Nair
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Cc:

Cllr. Sue Bennett

Shirley North Ward

Cllr. Gareth Streeter

Shirley North Ward

Cllr. Richard Chatterjee

Shirley North Ward

Bcc:

MORA Executive Committee, Local affected Residents & Interested Parties