



Georgina Betts – Case Officer
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**Monks Orchard Residents'
Association
Planning**

9th October 2023

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Reference:	23/03345/FUL
Application Validated:	31 Aug 2023
Address:	St George's Church of England, Elstan Way Croydon CR0 7PR
Proposal:	Erection of a single storey extension with a maximum height of 4.91 metres to the northern elevation of the Church to provide a new annexe to St. George The Martyr with associated internal and external alterations.
Status:	Awaiting decision
Consultation Expiry:	12 Oct 2023
Determination:	26 Oct 2023
Case Officer:	Georgina Betts

ADDENDUM TO MORA SUBMISSION (4th October 2023)

Dear Georgina Betts

Please accept this **Addendum** to our formal comment for this proposal sent to you on 4th October resulting on discussion with our Local Councillors.

It is our understanding that Officers might be concerned regarding loss of amenity to the adjacent occupants of **51 The Glade**. We would like to address those concerns by reference to the **London Plan Supplementary Guidance LPG Small Site Design Codes** at Section 4.5 - Rear Building Line projection.

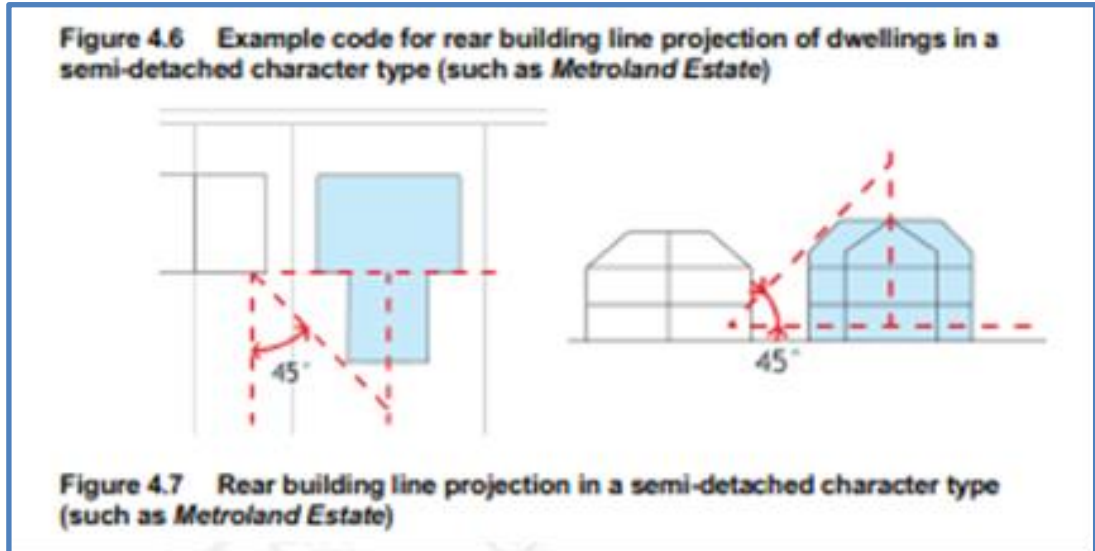
It is understood that the proposed Annex Extension is 2m distance from the Boundary with 51 The Glade which is adequate separation.

Para 4.5 Rear building line projection

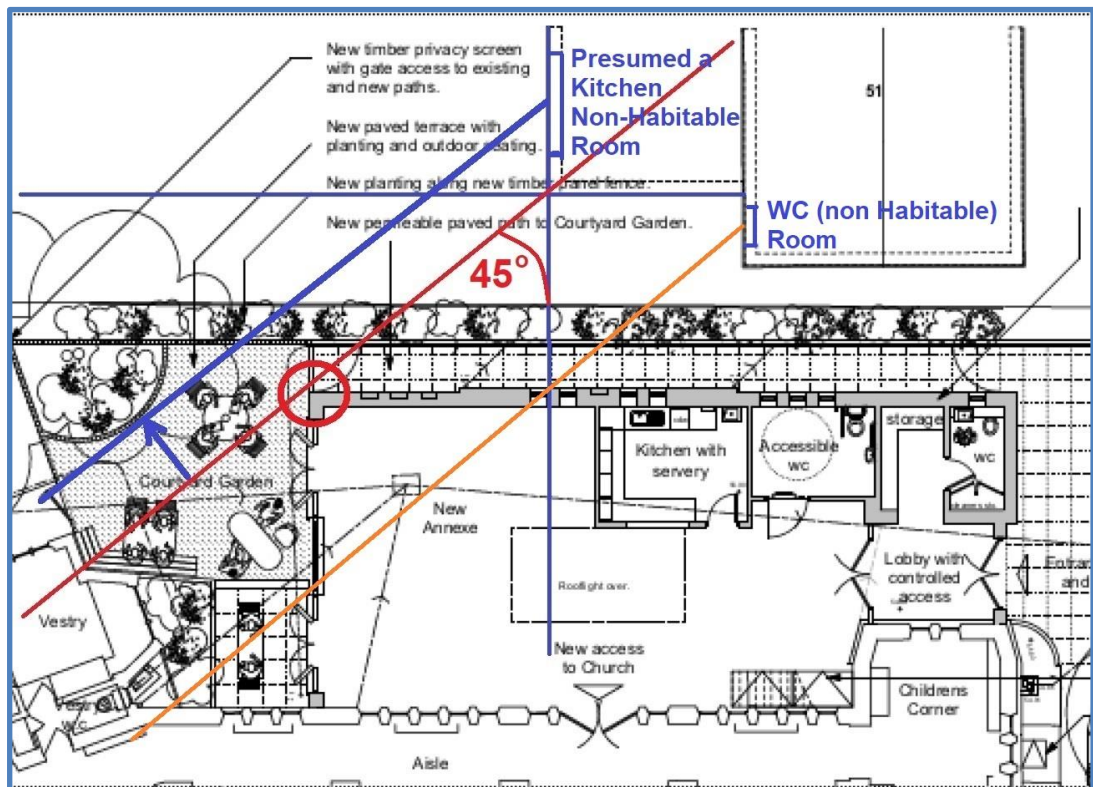
Para 4.5.1 When setting design codes for buildings or extensions that extend beyond a rear building line, parameters should be set to ensure that there is no unreasonable impact on the amenity of neighbouring homes in relation to daylight, sunlight and privacy.

Para 4.5.2 A good rule of thumb is to follow the 45-degree rule illustrated below. This rule specifies that the height and depth of a new development or extension should not breach a 45-degree line drawn from the centre of the window of the lowest, and closest, **habitable room** on the neighbouring property.

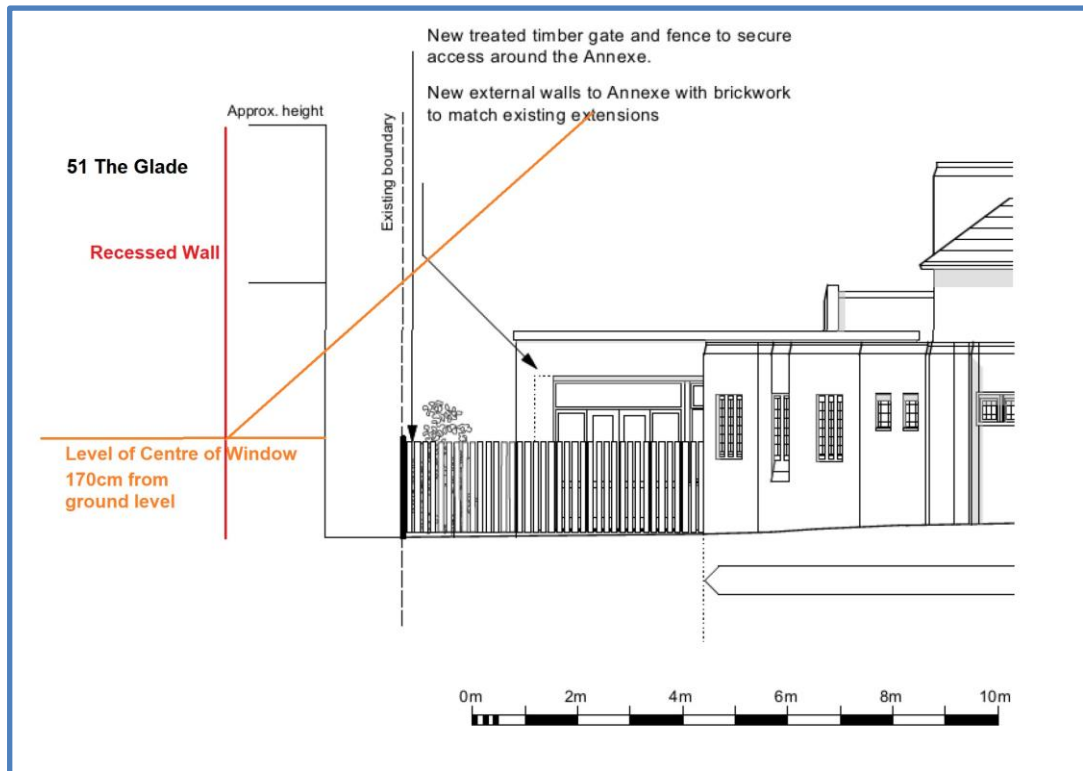
Para 4.5.3 Design codes can also use rear projection lines to set parameters on the height of new developments or extensions. These can ensure that new development is not overly dominant; and access to daylight and sunlight of the habitable rooms of neighbouring homes is maintained.



We have revisited the proposal with respect to this policy and would like to provide additional information to support our original submission for approval.



Plan of Church Extension and the adjacent Dwelling at 51 The Glade (Estimates)



Rear Elevation Church Extension and 51 The Glade (Estimated).

Concern might be raised relating to loss of amenity to the occupants of **51 The Glade**. The supplied plans do not identify the position of windows for the adjacent dwelling of **51 The Glade**, but to clarify the issue we have estimated their location. It can be clearly shown that the **45-Degree** Projection from the centre of the Ground Floor **Habitable Room** Windows at **51 The Glade**, cannot intersect the proposed new extension annexe to the Church.

The Policy as understood, concerns amenity to the neighbouring property as measured from the centre of the **nearest Ground Floor window** which serves a **Habitable Room**, and the **45-Degrees** projection, Vertically and Horizontally from that point to establish if this projection would intersect the proposed development.

The **45-Degree Rule** from London Plan Policy guidance is that the **45-Degree** projection from the Centre of the nearest 'Ground Floor Window' serving a **habitable room**, should not intersect the proposed development.

It is understood that the nearest ground floor window to the boundary with the Church and thus this proposal, is in the recessed rear building line of **51 The Glade** and serves a **WC (Toilet)** and thus is **NOT** a habitable room. There is also superficial evidence that the next room northward with flank wall adjacent to the proposed development is a Kitchen which is also considered a **Non-Habitable Room (unless it provides space for dining)**. **If only a kitchen, there is no loss of amenity** based on Policy, to the occupants of **51 The Glade** as a result of the proposed development.

The positions of the windows in the rear and flank elevations is not provided.



Any ground floor Window in the **Rear Elevation** would have its centre normally about **≈170cm** from ground level and would be on a horizontal line projected North. The **45-Degree** projection from this Line would be further distant from the roof of the proposed Church extension, the further along that line is away from the Boundary, the projection would increasingly clear the Proposed Church extension by a significant amount the further it is from the Boundary.

Nevertheless, a **45-Degree** projection from the southern nearest **corner** of the Rear elevation of **51 The Glade** with the Boundary of the Church and onward into the grounds of the Church would just miss the proposed North-west corner of the proposed development as shown 'circled' in the above illustration. Therefore, irrespective of the window position, the **45-Degree** projection from the centre of this ground floor habitable room window (even if **NOT** a Kitchen), could **NOT possibly** intersect the proposed development as the further distance North of the window and its centre in that elevation, the greater the trajectory gap would be of the **45-Degree projection** intersection with the proposed extension.

If there are any windows to the Southern Flank elevation wall overlooking the backyard, those would directly face the proposed development but there is no dimensions to make an assessment. If such windows are the same level from ground level of 170cm the 45-Degree projection South vertically would clear the proposed development. This would be irrelevant if the room served is a kitchen.

However, the above illustrations provide an estimated assessment which even with estimated values provides convincing evidence that the **45-Degree** intersections clearly do not intersect the proposed extension annexe of the Church.

In conclusion, we are therefore of the considered opinion that there is **NO 'Policy' degradation of Amenity** to the occupants of **51 The Glade** by the proposed extension development which could contribute to a refusal of this proposal. Any other interpretation would therefore be a personal subjective assessment.

Kind regards

Derek



Derek C. Ritson I. Eng. M.I.E.T.

MORA – Planning

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CC:

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Cllr. Richard Chatterjee

Cllr. Mark Johnson

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Shirley North Ward

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