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**Monks Orchard
Residents' Association
Planning**

29th May 2025

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Reference: 25/01471/FUL
Application Received: Wed 30 Apr 2025
Application Validated: Wed 30 Apr 2025
Address: 21 Woodmere Gardens Croydon CR0 7PL
Proposal: Demolition of single-family dwelling and garage and the erection of 4 bungalows 1 x 3 bed and 3 x 2 bed. Provision of 6 off road parking spaces.
Status: Awaiting decision
Case Officer: Christopher Grace
Consultation Close: Mon 02 Jun 2025
Decision Deadline: Wed 25 Jun 2025

Dear Mr Grace

Please accept this letter as MORA's formal comment with respect to **Application Ref: 25/01471/FUL** for Demolition of single-family dwelling and garage and the erection of 4 bungalows 1 x 3 bed and 3 x 2 bed. Provision of 6 (8) off road parking spaces.

This new proposal is an improvement on the previous refused proposal Ref: **22/02598/FUL**.

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Proposal Parameters

21 Woodmere Gardens	Units	4		Area Type	Outer Suburban	Floor Area Ratio (FAR)	0.26		PTAL	2011	Zero				
Ref: 25/01471/FUL	Site Area	1220	sq.m.	Residential Density	139.34	bs/ha	Footprint Area (Note 4)	182.71	sq.m.	PTAL	2021	Zero			
New 30/07/22	Site Area	0.122	ha	Housing Density	32.79	unit/ha	Plot Area Ratio (PAR)	0.15		PTAL	2031	Zero			
New Dwellings	Floor	Bedrooms	Bed-Spaces available (Persons)	GIA Offered (sq.m.)	GIA Required (Table 3.1)	GIA Best Practice (Table A1.1) Note 1	Built-In Storage offered (sq.m.)	Built-In Storage Required (Table 3.1)	Built-In Storage Best Practice (Table A1.1) Note 1	Private Open Space offered (sq.m.)	Car Parking Space	Disabled Bay or Electric Charging Point (Note 3)	Cycle Store (Note 3)	Estimated Number of Adults	Estimated Number of Children
	Unit 1 Bungalow	Ground	3	5	89.50	89	97.00	1.3	2.5	3.00 (note 2)	2	Not Stated	Not Stated	2	3
	Unit 2 Bungalow	Ground	2	4	76.10	70	77.00	1.3	2.0	2.50 (note 2)	2	Not Stated	Not Stated	2	2
	Unit 3 Bungalow	Ground	2	4	76.10	70	77.00	1.3	2.0	2.50 (note 2)	2	Not Stated	Not Stated	2	2
	Unit 4 Bungalow	Ground	2	4	76.10	70	77.00	1.3	2.0	2.50 (note 2)	2	Not Stated	Not Stated	2	2
Totals		9	17	317.8	299.0	328.00	5.3	8.5	10.50	0.0	8.0	0.0	0.0	8.0	9.0

Note 1: LPG 0 Housing Desing Standards

Note 2: The Design & Access Statement Section 4 Para 4.6 states - Garden sizes would meet minimum size Stnardtrs for two & three Bedromed Units.

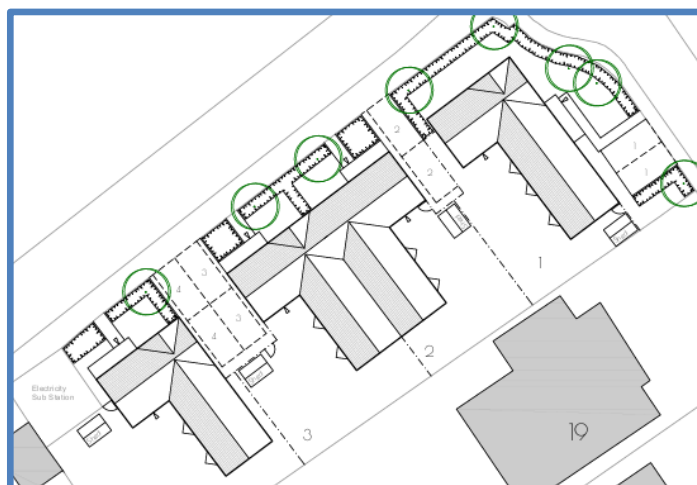
Note 3: The Design & Access Statement Section 6 Paras 6.33 & 6.34 indicate these could be achieved by Conditions.

Note 4: Footprint not provided - Measured off the scaled block diagram at magnification 112% where 1cm = 2m provides reasonable estimate.

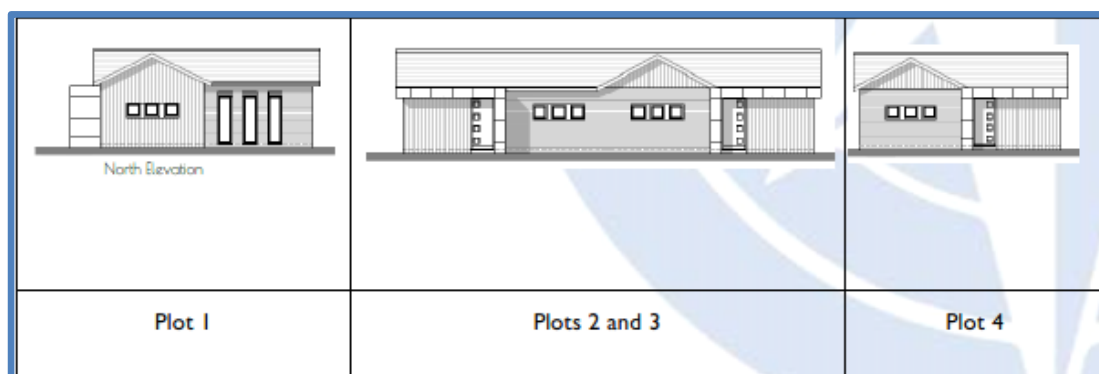
¹ <https://www.gov.uk/guidance/exceptions-to-copyright>

General Observations:

- a) The Application Documentation lists **6 off-street parking bays**, but the plans provided indicate **8 off-street parking bays**.
- b) There are provisions for **Built-In Storage Space** of $\approx 1.3\text{sq.m.}$ located within the kitchen/dining/living accommodation area. However, this does not meet the London plan Requirement **Table 3.1** or **Best Practice LPG Housing Design Standards - Table A1.1**.
- c) There is no **Disabled Parking Bay** ($\leq 10\%$) nor any indication of whether **Electric Vehicle Charging Points** are provided.
- d) There is no provision for **Cycle Storage** as the **PTAL** is the lowest value at **Zero** but again, this could be the subject of a condition.
- e) There are no identified provisions for the **required Refuse/Recycling Bins** for each unit, or their position to be used on collection days.
- f) The **Floor Area Ratio (FAR)** is **0.26** which is acceptable (≤ 0.5) for **Area Type Outer Suburban**.
- g) The **footprint - Gross External Area (GEA)** is not provided or has not been found in the supplied documentation. The **Footprint** as measured from the scaled block diagram at magnification **112%** (where **1cm \equiv 2m**) provides an estimate at $\approx 182.70\text{ sq.m.}$ This gives a **Plot Area Ratio (PAR)** of $182.70/1220 \approx 0.15$ which after all requires space for **Car Parking, Refuse Bin Storage, Cycle Storage, etc.**, means there is a very small allocation for **Urban Greening or Garden Area** for **Area Type Outer Suburban at PTAL 0**. The Average **Plot Area Ratio (PAR)** for **Woodmere Gardens** as measured by **Google Earth** is ≈ 0.5 .
- h) The **Housing Density** is **32.79 Units/ha**.
- i) The **Residential Density** is **139.34 Persons/ha**
- j) The **Area Type**, as defined by the **National Model Design Code & Guidance**, is '**Outer Suburban**'.

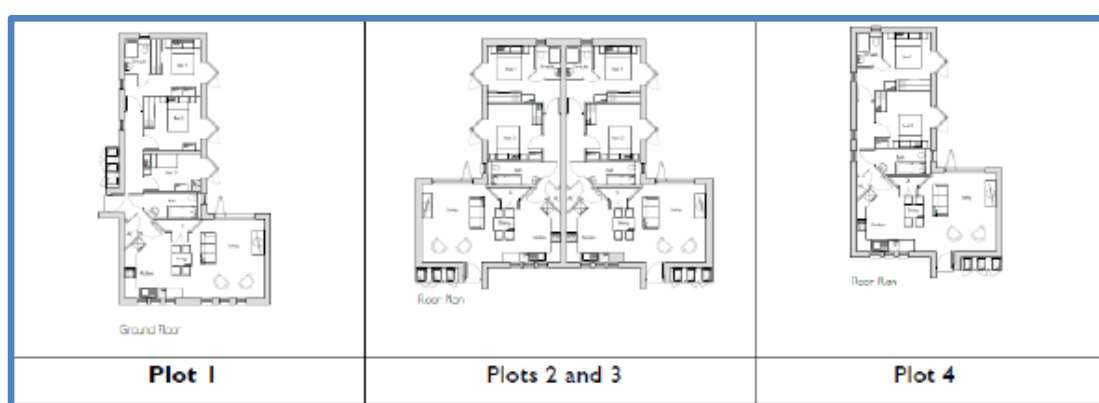


Block Plan of the site



Street View from Woodmere Avenue

Floor Plans



Assessment

Occupancy Capacities

Unit	Bed 1 Excluding En-Suite Shower (sq.m.)	Capacity (Persons)	Bed 2 (sq.m.)	Capacity (Persons)	Bed 3 (sq.m.)	Capacity (Persons)	Total	Bed 1 En Suite Shower (sq.m.)	Bed 1 Including En-Suite Shower Total (sq.m.)	Capacity (Persons)	Total
Unit 1 Bungalow	9.98	1	12.355	2	9.38	1	4	3	12.98	2	5
Unit 2 Bungalow	9.98	1	12.355	2	-	0	3	3	12.98	2	4
Unit 3 Bungalow	9.98	1	12.355	2	-	0	3	3	12.98	2	4
Unit 4 Bungalow	9.98	1	12.355	2	-	0	3	3	12.98	2	4
Total		4		8		1	13			8	17

Bedroom Capacities: London Plan Housing Design Standards

Policy D6 - Private Internal Space

The bedroom sizes have been measured by scaling-off the supplied drawings using a magnification on the monitor screen of **113%** where the bar scale **1cm ≡ 1m**. This provides a reasonable rough guidance of the Capacities offered for each of the bedrooms.

Bedroom 1 for all four **Units** without the **En-Suite** is measured at **≈9.98 sq.m.** which, at **9.89 sq.m.** is **<11.5sq.m.** would only accommodate a **single bed/person**. The **London Plan Policy D6** does not clarify if an **En-Suite Shower Room & WC** with bedroom is classed as contributing to a bedroom floor area allocation, which in this case is an additional **3 sq.m.** bringing the total to **12.98 sq.m.** and thus possibly allowing the bedroom to accommodate **2 persons; i.e., >11.5 sq.m.**

London Plan Policy D6 Housing Design Standard

Private Internal Space

- 1) Dwellings must provide at least the **Gross Internal Floor** area and **Built-In Storage** area set out in **Table 3.1**.
- 2) A dwelling with **two or more bedspaces** must have at least one double (or twin) bedroom that is at least **2.75m wide**. Every other additional double (or twin) bedroom must be at least **2.55m wide**.
- 3) A one bedspace single bedroom must have a floor area of at least **7.5 sq.m.** and be at least **2.15m wide**.
- 4) A two-bedspace double (or twin) bedroom must have a floor area of at least **11.5 sq.m.**

Best Practice parameters are detailed in the LPG Housing Design Guide & **Table A1.1**.

LPG Housing Design Guide C2.5 States:

C2.5 The following combined floor areas for living/kitchen/dining space should be met or exceeded:

Designed Level of Occupancy	Minimum Combined Floor Area Living/Dining & Kitchen Space (sq.m.)
One Person	21 sq.m.
One Bed, Two Persons	23 sq.m.
One Bed, Three Persons	25 sq.m.
Two Bed, Four Persons	27 sq.m.
Three Bed, Five Persons	29 sq.m.
Four Bed, Six Persons	31 sq.m.

Unit 1, which is 3 beds, 5 persons has a combined kitchen/dining/living area of ≈33.32sq.m. which exceeds the requirement of 29 sq.m.

Parking

The application lists the provision of **6 (six) parking spaces** when the supplied plans show **8 (eight) parking spaces**.

The requirement for both the Croydon Local Plan and the London Plan for dwellings in a **PTAL of Zero** is **1.5 spaces per dwelling** which the proposal at either 6 or 8 spaces would meet.

Unit 1 Parking Spaces are accessed from Woodmere Gardens.

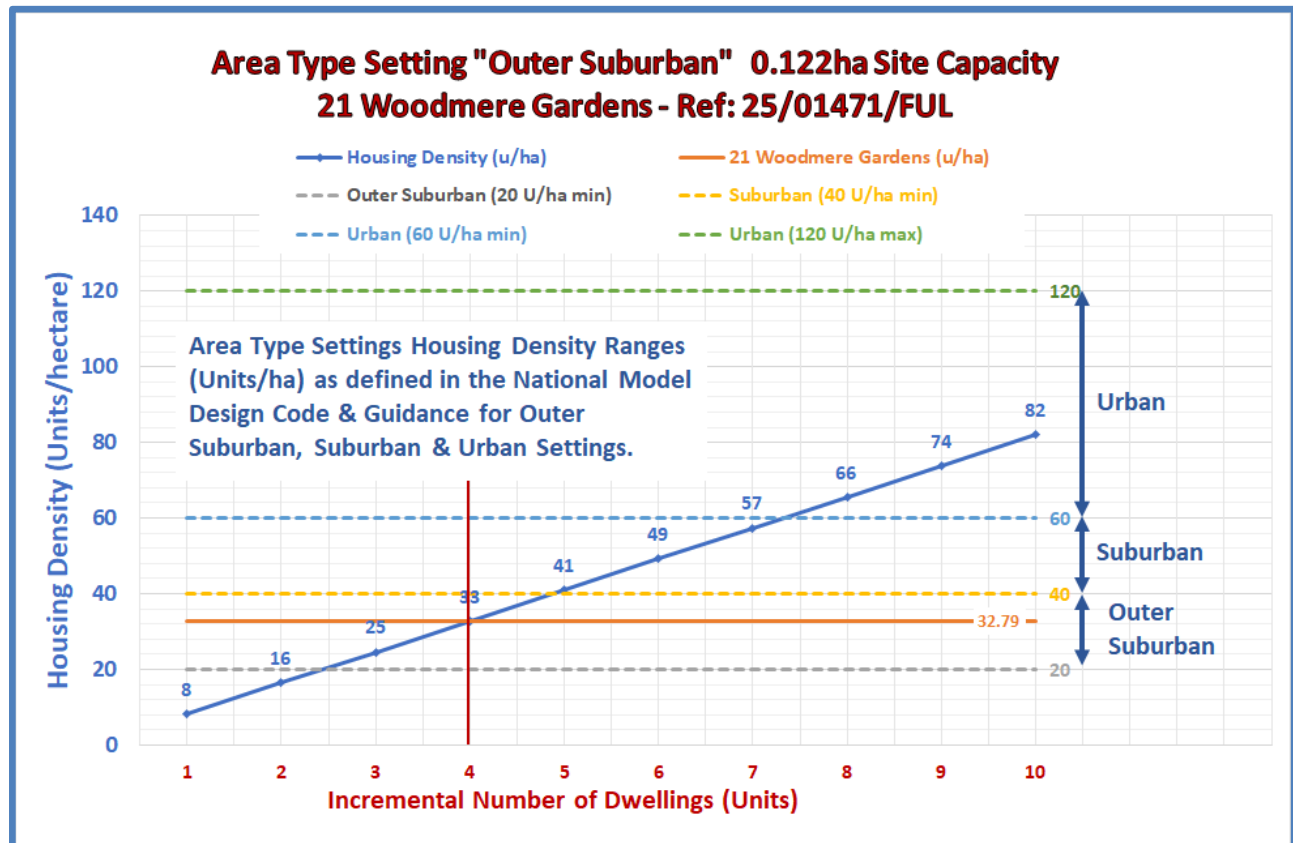
Unit 2, 3 & 4 Parking Spaces are accessed from **Woodmere Avenue** but are double banked requiring the front vehicle to be moved for the rear vehicle to exit. This is an

indication of over development as there is insufficient **Plot Area** for side-by-side parking.

Unit 3 Parking Spaces as shown on the Block Plan are within the boundary of **Unit 4**.

Site Capacity London Plan Policy D3 – Optimising Site Capacity

London Plan Policy D3 – Optimising Site Capacity through the **Design Led Approach** requires all proposed requirements meet the **Plot Area Ratio** for the **local area** Type setting of **Outer Suburban**.



Graphical illustration of Site Capacity for 0.122ha in relation to the Area Type Setting as defined by the National Model Design Code & Guidance

The proposal at housing density **32.79units/ha** would be within the **Area Type Outer Suburban** for 4 units within the **site capacity**.

Refuse & Recycling

The Highways Statement specifies: *"Refuse storage areas are within the 20 metres of the public highway as per the requirements of the Suburban Design Guide (SPD2). The servicing arrangements for the development are satisfactory."*

However, there is no indication of the location of these storage areas on the **Block Plan for storage or on collection days**. It is not considered appropriate for these refuse/recycling Bins to be stored within the provided **Sheds**.

Local Character

All existing dwellings in **Woodmere-Avenue** Fronting Ashburton Playing Fields to the north of the Electric Substation are single-storey bungalows therefore the proposed bungalows reflect the existing local character. The relationship between **build form** and **garden area** within the local area is given by the **Plot Area Ratio (PAR)** at **≈0.15**. This means that after all the **required space** for **Car Parking, Refuse Bin Storage and Cycle Store**, there is a very small allocation for **Play Space, Garden Area or Urban Greening** when the **Urban Greening Factor (UGF)** of **0.4** for **Residential Areas** as is stated in the **London Plan Table 8.2**.

The In-Line-Parking of units 2, 3 & 4 confirms a Clear indication of Over-Development for **Outer Suburban Area Type** setting.

Local Design Code Analysis and assessment.

The NPPF at paras 128 & 129 State:

128. *To provide maximum clarity about design expectations at an early stage, all local planning authorities should prepare **design guides or codes** consistent with the principles set out in the **National Design Guide and National Model Design Code**, and which reflect local character and design preferences.*

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.***

National Model Design Code & Guidance – Area Type Settings.

The national Model Design Code & Guidance provides a range of Area Type Settings

The local Area Type settings are defined by the National Model Design Code & Guidance as:

Area Type	Housing Density	Residential Density ²
Rural	<20 Units/ha	<47.2 persons/ha
Outer [London] Suburban	>20 & <40 Units/ha	>47.2 & <94.4 p/ha
Suburban	>40 & <60 Units/ha	>94.4 & <141.6 p/ha
Urban	>60 & <120 Units/ha	>141.6 & <283.2p/ha
Central	>120 Units/ha	>283.2 p/ha

In accordance with the current **NPPF of December 2024 at para 134**, **The National Model Design Code & Guidance (2021)** should be used to **“Guide decisions”** in the **absence** of locally produced **“Design Guides” or “Design Codes”**.

² <https://www.statista.com/statistics/295551/average-household-size-in-the-uk/> (2.36 persons/Unit in 2023)

We have **not** found any such locally defined “**Design Guides or Design Codes**” in the current **Croydon Local Plan (2018) or the Revised Croydon Local Plan (2024)** which is currently the subject of **Regulation 19** consultation; **thus, we are assessing the proposal on the National Guidance as specifically required by the NPPF para 134** ³).

The proposal at Housing Density of 4units on 0.122ha ≈32.79u/ha places the proposal in the range 20 to 40 units/ha of **Outer [London] Suburban** Area Type.

Housing Need

Sustainability Appraisal (SA) of the Croydon Local Plan Partial Review SA Report - May 2024

Para 5.4.111 to 5.4.115 states:

Shirley

- 5.4.111 Located at the eastern extent of the Borough, and mostly associated with low PTAL, although there is a local centre. The proposal in 2022 was for four allocations, although the latest proposal is for three.
- 5.4.112 Two of these are small sites, namely: Site 504 – is closely associated with a designated SINC (a cemetery) and would involve conversion of a locally listed pumping station for 24 homes (CLP 2018 states up to 68 homes; and Site 87 – is proposed for 9 homes, having been proposed for 18 homes in 2022 and up to 25 homes at the I&O stage. The scheme must deliver a replacement community centre.
- 5.4.113 The final site is then larger (Site 128), now proposed for 123 homes having been proposed for 91 homes in 2022. It is described by CLP 2018 as a ‘cleared site’ but includes significant mature vegetation.
- 5.4.114 The one omission site (Site 502) is located in the Green Belt, but the CLP 2018 allocation (90 homes) assumes that development could occur without Green Belt release. A SINC is adjacent and PTAL is very low, hence there is little case for questioning the decision to delete the allocation.
- 5.4.115 **In conclusion**, there is no reasonable option for significantly boosting housing supply.

There is therefore no reasonable option for significantly boosting housing supply (In Shirley).

NPPF (2024) - Determining applications

Para 48. Planning law requires that applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise.

Summary

We have assessed the proposal against all the appropriate Local, Regional and National Planning Policies and in the main in most cases the proposal is fully compliant. We believe this proposal is more appropriate for the locality and is an improvement on the refused previous application Ref: 22/02598/FUL.

³ <https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system>



Although there is no reasonable option for significantly boosting housing supply In Shirley, we believe there is a general Housing Need for Bungalow Type properties within the Shirley Area.

The only **areas of concern** are listed below:

The proposal has **inadequate In-Built Storage**, and there is no provision for **Cycle Storage** as the **PTAL** is the lowest value at **Zero**, but these could be the subject of conditions. There are no identified provisions for **Refuse/Recycling Bins** for each unit, or position to be used on collection days.

The **footprint - Gross External Area (GEA)** is not provided or has not been found in the supplied documentation. The **Footprint** as measured from the scaled block diagram at magnification **112%** (where **1cm ≡ 2m**) provides an estimate at **≈182.70 sq.m**. This gives a **Plot Area Ratio (PAR)** of **182.70/1220 ≈ 0.15** which after all required space for **Car Parking, Refuse Bin Storage, Cycle Storage, etc.**, means there is a very small allocation for **Urban Greening or Garden Area** for **Area Type Outer Suburban at PTAL 0**. The Average **Plot Area Ratio (PAR)** for **Woodmere Gardens** as measured by **Google Earth** is **≈0.5**.

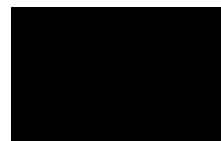
Unit 2, 3 & 4 Parking Spaces are accessed from **Woodmere Avenue** but are **double banked** requiring the front vehicle to be moved for the rear vehicle to exit. This is another indication of over-development as there is insufficient area to accommodate **side by side parking**.

We have assessed this proposal against the current Planning Policies and are of the view that taken overall, it materially meets the current policies and where deficiencies arise these can be resolved by conditions. MORA therefore take the view that this proposal is an improvement and on the previous refused application that deficiencies could be resolved by conditions. Therefore, MORA is of the view that we should take a **Neutral Stance** in regard to this proposal and rely on planning officers to make a recommendation appropriate for the suitability of this proposal in an **Outer Suburban** Area Type setting.

Kind Regards



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