

The London Plan Team
Greater London Authority
City Hall
The Queen's Walk
London SE1 2AA

Monks Orchard Residents' Association
Planning

Email: londonplan@london.gov.uk
QualityHomesLPG@london.gov.uk

9th December 2020
Email: planning@mo-ra.co

Dear London Plan Team

MORA is a registered Residents' Association with the London Borough of Croydon. We represent 3884 households in the Shirley North Ward ^[1].

We offer the following Response to your Consultation: "Good Quality Homes for All Londoners". (MORA comments blocked with green background).

Optimising Site Capacity "A DESIGN-LED APPROACH"

Module A para 1.1 Purpose

*"The purpose of this London Plan Guidance is to help interpret and implement the Intend to Publish London Plan (London Plan) policies on housing design, **optimising site capacity on all scales of site and enabling housing supply through smaller housing developments**, with the wider purpose of supporting Good Growth. The guidance sets out a design-led approach to intensification, using residential types to quickly identify the indicative capacity of a site or area, with careful consideration of housing design standards that protect quality of life for residents."*

However, later in the document, it specifically **excludes** minor developments such as in-fill and windfall re-development sites from this assessment. (see Page 38).

*"Minor developments will typically have **incremental impacts on local infrastructure capacity**. The cumulative demands on infrastructure of minor development **should be addressed in boroughs' Local Plans, IDPs and Programmes** (and funded for example by planning obligations). **Therefore, it will not normally be necessary for minor developments to be supported by infrastructure assessments**. Boroughs should also **not need to refuse permission to these schemes on the grounds of infrastructure capacity** if necessary and proportionate contributions towards the cost of supporting infrastructure are planned and secured."*

If low PTAL (less than 3) and **suburban residential** areas have **no prospect or planned increase in infrastructure to support 'cumulative' minor developments**, and are NOT assessed by the **"Design-Led Approach"** how are the **Residential and Housing Densities** of these Minor Developments **Assessed as 'Acceptable or Unacceptable'?** (See Para 1.5 - Stage One: Site analysis using capacity factors, and Para 2.2.6 Infrastructure Capacity).

[1] <http://www.mo-ra.co/about/membership/>

Para 1.2 Structure

Module A: Optimising Site Capacity - A Design-led Approach

Sets out a design-led methodology for optimising site capacity at the plan making stage and provides an approach to assessing sites' suitability for development. This module also offers a site capacity toolkit which includes downloadable digital models of residential types and an Indicative Site Capacity Calculator.

The module provides a range of **residential types** to test **site capacity**. The most common existing and emerging housing types are categorised based on their typical characteristics, access and circulation arrangements and their ability to meet Module C's housing design quality standards. Each type is described in terms of its inherent qualities, characteristics, flexibility to accommodate different tenure and type mixes and suitability for integration with mixed uses. Module A provides guidance on the residential type suitable for a site, in order to determine potential capacity."

The "Design-Led Approach" definition is based upon a '**subjective assessment**' which is not **definitive** but subject to **various interpretations** which could **not withstand a legal challenge if an applicant objected to the assessment**. The 'assessment' Policy could **NOT be enforced** and does not meet the **NPPF paras 16 or 35 requirements**.

"**NPPF Para 16 Plans should:** d) contain policies that are **clearly written and unambiguous**, so it is evident how a decision maker should react to development proposals; ..."

"**Examining plans:**

NPPF Para 35. Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are **sound**. Plans are '**sound**' if they are:

c) **Effective – deliverable** over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

d) **Consistent with national policy** – enabling the delivery of **sustainable development** in accordance with the policies in this Framework. ..."

See also: **Extracts from 'Inspectors Report' – Draft London Plan (8th October 2019) Consistency with national policy and guidance (page 35 below):**

1.3 Who is it for?

"The document comprises four modules that seek to provide helpful guidance and increased certainty for all Londoners that good growth is possible and will happen. This guidance is aimed at landowners, prospective developers, architects and wider design teams, planners and decision-makers across the public, private and community sectors. The different modules will be of different levels of interest to different parties. **The guidance also hopes to provide local communities with confidence that the Mayor is determined to work with development partners to deliver growth that safeguards amenity and helps ensure that all Londoners have a good quality of life.** Module A is principally aimed at borough policy officers tasked with determining site capacity."

How does this new guidance provide **Local Communities** with **confidence in the planning process** – which has **been lost** due to the **lack of enforcement of the London Plan Policies; e.g. Policy 3.4 – Optimising Housing Potential?** (see histogram at response to para 2.2.6 below).

1.4 What is Site Optimisation

“Boroughs are expected to establish **optimum site capacities** for site allocations through a consultative, proactive, design-led approach that allows for **meaningful collaboration with communities**, organisations and businesses. Community engagement by boroughs is an important dimension of ensuring the design-led approach to optimising site capacity. When successful this will deliver housing of the good quality necessary to enhance the quality of life for all Londoners and make a positive contribution to the quality and character of existing neighbourhoods. **Boroughs should commit to sincere community engagement** - carried out in accordance with up to date Statements of Community Involvement - that connects with the views of their local communities. Feedback gained should then be used to shape the policy framework throughout its various stages of development.”

Our LPA (LB of Croydon) does **NOT** engage with **Local Residents** or their **Residents' Associations** so how do you enforce **'effective and sincere' Community Engagement** ^[2] with the **Local Community?**

1.5 Introduction to Module A: Identifying Optimum Site Capacity

“Optimum site capacity is defined as development with the most appropriate form for its site, following an evaluation of the site’s attributes, its surrounding context and its capacity for growth (London Plan Policies D1, D2, and D3). There are three stages to identifying optimum site capacity...”

Stage One: Site analysis using capacity factors

“A set of capacity factors is presented to help boroughs to evaluate the attributes of sites and their capacity to support growth. Capacity factors are the existing qualities and characteristics of the site and surrounding area that will contribute to site capacity, including existing and proposed infrastructure - an important element in determining optimum site capacity – and any ongoing engagement feedback from stakeholders. This approach is consistent with the identification of areas appropriate for extensive, moderate or limited growth to support borough-wide growth requirements.”

The Consolidated London plan (clean July 2019) at Policy 3.1B.22 & 23 States that applicants MUST provide:

3.1B.23 To help assess, monitor and compare development proposals several measures of **density** are required to be provided by the applicant. **Density measures related to the residential population will be relevant for infrastructure provision**, while measures of **density related** to the built form and massing will inform **its integration with the surrounding context**. The following measurements of **density should be provided** for **all planning applications** that include **new residential units**:

1. number of units per hectare;
2. number of habitable rooms per hectare;
3. number of bedrooms per hectare;
4. number of bed spaces per hectare.

[2] <https://www.croydon.gov.uk/sites/default/files/Croydon%20Council%20Governance%20Review%20Enhancing%20Democracy%20March%202020%20main%20re....pdf>

and at Policy 3.1B.24 States:

1. Floor Area Ratio - Gross External Floor Area (GEA) (all floors per site area);
2. The Site Coverage Area – Gross External Ground floor area (GEA) per site area;
3. The maximum height in metres above ground level of each building and at Above Ordinance Datum (above sea level).

(The Site Area is implied but **not asked for in the above list** but can be 'roughly' deduced from the supplied figures!)

There is no statement describing how these **density parameters** should be **evaluated, interpreted or assessed** to calculate the **acceptability or otherwise** of a proposal. How are these values to be analysed to establish '**acceptability**'? What are the **density limits** to determine **acceptable or unacceptable** values appropriate for the **site context** or the locality for '**Extensive**', '**Moderate**' or '**Limited**' growth designations? (What is the controlling methodology? The 'Design-led Approach' does not provide a methodology).

It's pointless providing these parameters (Policy 3.1B.22 & 23) if there is **no methodology of their assessment or evaluation to determine the acceptability or unacceptability** of a proposal!

Surely, this assessment should be the purpose of the SPG. (See Answer to Mayor's **Question No:2019/8976** ^[3] which stated that this would be clarified in the planned SPG's on the Design-Led-Approach.)

There is no requirement to define any **supporting infrastructure requirement** for site locations to determine the '**Optimum Site Capacity**'? [Requirement of NPPF para 16 b) & d); para 35 a), b), c) & d), paras 102 and 122 c).].

Stage Two: Use of Residential Types

"This stage introduces a range of prevalent and successful housing types in London. It details their characteristics and capacity to optimise housing delivery.

Certain residential types may be particularly suitable for unlocking smaller housing developments on constrained, small sites (see Module B). A combination of other residential types, such as terraces, linear blocks, villa blocks and towers, may be best suited to optimise site capacity on larger sites. Each residential type is accompanied by case studies and an evaluation of how they perform against housing design quality and standards (Module C)."

Does the existing "**Residential Type**" of a locality define the "**Type**" of **Residential Development** suitable for **that locality**? and if so, how is the "**Type**" to influence '**Extensive**', '**Moderate**' or '**Limited**' growth **designations**? (What is the **methodology** of assessing these '**growth factors**' appropriate for that **designation** and locality?)

The "**Residential Types**" do not define the **densities** afforded by those '**types**' as it does not define the **internal configuration** or the '**Residential Capacity**' of the "**Residential type**" of dwelling.

[3] <http://www.mo-ra.co/planning/planning-report-october-2019/#QuestionstoMayor>

Stage Three: Testing Site Capacity

A site capacity tool has been included to test indicative site capacities during plan-making. This ensures a proposed development delivers optimum site capacity. The tool requires the selection of residential types based on their appropriateness for a site and their ability to deliver quality of life for residents.

What **'parameters'** of the site capacity **'tool'** defines **'site capacity'**?

If this **capacity** relates only to **'residential types'** it would exclude the required **infrastructure** to support the **proposed development** or if the development is in addition to other **cumulative developments** in the locality, how is the **site capacity measured** as the residential occupancy and density is undefined.

What defines the level of **cumulative infrastructure requirements for cumulative developments** to ensure adequate support for **'cumulative sustainable developments'**? (See also response to para 2.2.6).

1.6 Borough-wide growth and change

- *“Area assessments: Identify the areas that are appropriate for **extensive, moderate or limited growth** to accommodate borough-wide growth requirements as the foundation of Development Plan preparation and area-based strategies. This process should inform decision-making about how places should develop, speeding up the Development Plan process and bringing about better-quality development (D1.B).”*

If the locality has **low PTAL** (i.e. < 3) and is > **800m** from a **train/tram station** or **town centre boundary** and the **forecast PTAL** is **unlikely to be improved** in the **foreseeable future**, what would be the assessment for **'Limited'** growth in that locality and what would be the maximum **Residential and Housing Densities** allowable to ensure **cumulative developments** have **sustainable infrastructure**?

2 Stage One – Site Analysis using Capacity Factors

*“It is anticipated that before attempting individual site and context analysis, boroughs will have undertaken characterisation to define character areas (see Fig B.1) in accordance with London Plan Policy D1. This will **inform** a borough-wide spatial strategy for distributing good growth. Where borough-wide characterisation is available, the capacity factors outlined in the next section provide a complementary means of character analysis associated with optimising the capacity of individual sites. Where boroughs are yet to undertake characterisation as part of their area assessment, the following factors (Section 2.2) should be considered (Policy D1: Part A).”*

Will **local consultation** with **Residents and Residents' Associations** be required to agree the **'local characterisation'** of a **Residential area** and its **boundaries**?

2.2 Capacity Factors

2.2.1 physical site characteristics

“A detailed analysis of the physical features of the existing development site should include consideration of the following questions:”

Physical Capacity Factors:

- a. Existing qualities and characteristics – defined by what? What are the **criteria and parameters** to define these **‘Capacity indicators’**?
- b. Existing and Proposed Infrastructure – again, defined by what? There is no defined relationship between **development characteristics ‘capacity’** and **supporting infrastructure ‘capacity’**?
- c. “... and any ongoing engagement feedback from stakeholders ...” Do stakeholders include local residents or their representative **Associations** or local Councillors?
- d. How are these parameters **measured** such that the assessment can withstand a legal challenge if necessary?
- e. Define the limiting parameters of areas appropriate for **‘extensive’, ‘moderate’ or ‘limited’ designated areas of growth** to support **borough-wide growth requirements** taking into account existing and planned services and infrastructure (including public transport accessibility) to support the proposed development. (an NPPF requirement).
- f. The **site area** is required for item 2.1 above. (although not called for in the list).
- g. The boundaries and edge conditions do not influence whether an application should be considered – the proposal should include the works appropriate to bring satisfactory improvements to these boundaries.
- h. How are these other **‘conditions’** included in the characteristic assessment such that they are not a **‘subjective’** assessment by a case officer.
- i. Sites subject to surface water and flooding should be precluded from development to allow natural expansion of the flood plain to absorb surface water and avoid restriction of surface water and the expansion of further local flooding (management of surface water areas further downstream).
- j. A proposal should identify whether there are existing on site buildings, their state and whether they are proposed to be demolished.
- k. The issues should be covered by compliance to Policies on the preservation and effects on existing adjacent buildings; e.g. overlooking, loss of amenity and natural light.
- l. How does **‘is existing open spaces’** affect a site’s ‘Characterisation Assessment Code’? would this be a **subjective or definitive assessment**?
- m. How is existing vehicular, cycling and pedestrian access measured for assessment of site capacity for development? What is the ratio to occupancy?
- n. How do you measure cycle parking and public transport accessibility and the integration to support access? The only current assessment is the **‘TfL WebCAT’**.



- o. If there is existing car parking, this relates to existing services which may be lost if the site is developed; so how does this affect the site or local characterisation assessment for the locality?
- p. How does the scope of extending the scheme (what scheme?) to include adjacent 'sites' affect the characterisation assessment for the site or locality for development?
- q. Where is the assessment of other **physical supporting infrastructure parameters** and how it is measured to determine the acceptability to support the future occupants of a proposed development?

2.2.2 Planning Policy, Guidance and History

Understanding existing and emerging development plan designations is critical when considering the potential for a site to support good growth, and when preparing development plans and area-based strategies. A thorough assessment of existing policy should begin by addressing questions, including:

- Does the site have any **'Restrictive Covenants'** precluding or limiting development?
- Does the site include any historical open **public pathways** or **"rights of way"** which need continued public access?
- Has the site any historical evidence of **'contaminated'** land?

2.2.3 Heritage assets and views

"Heritage assets and protected views can make significant contributions to local character, adding to the distinctiveness of place. A thorough consideration of how heritage assets and views may benefit local character and offer opportunities to enhance new development should begin by addressing the following questions:"

No comment

2.2.4 Environment considerations

"Optimum site capacity will be achieved where the form of development is shaped by an understanding of environmental factors (e.g. flood risk, air quality and noise pollution) to enhance opportunities for positive environmental change for all Londoners and prevent or reduce the negative impact of potential detrimental environmental change.

A thorough consideration of environmental factors should begin by addressing questions, including:"

Flood risk

- a. Local surface water flood analysis should consider the effects of any underground streams and culverts which may affect developments downstream.
- b. Sites subject to surface water and flooding should be **precluded** from development to allow natural expansion of the flood plain to absorb surface water and avoid restriction of surface water and the expansion of further local flooding (management of surface water areas further downstream).

- c. It is unwise to allow proposed developments to be sunk below ground surface level in order to meet height restrictions of adjacent properties as this results in precipitation from large catchment areas to find the lowest area to pool and flood ground floors via thresholds of new developments.

Examples in our area of new developments sunk into holes in the ground to meet height restrictions of adjacent dwellings, are now surrounded by '**sand-bags**' to keep surface water from flooding the ground floor flats!

Air quality

"Site capacity will be optimised and good growth served where new developments contribute to reducing public exposure to pollution. This can be achieved by minimising or avoiding new sources of pollution and considering how the overall design and urban form can contribute to aiding the effective dispersion of pollution."

- **Air quality** should be defined by **specifying the allowable maximum pollution limits** as measured at allowable **worst case** limits at appropriate times of the day/night and for specific durations.
- Local **Incinerators'** air pollution should be continually monitored and **immediately shut down** if exceeding the set level of discharge into the local atmosphere.

Noise Pollution

"Boroughs should identify sources of noise pollution that have the potential to impact negatively on future residents and existing communities. These sources include noise generating uses (e.g. pubs, concert halls and sports pitches); noise from infrastructure (e.g. road, rail and air); and plant noise (London Plan Policy D14: Noise). Noise levels within internal environments should ensure internal noise levels minimise the risk of adverse noise impacts on health. Site layout, building orientation, separation distances, acoustic screening, and other measures should be considered carefully to mitigate noise pollution. Noise pollution officers are an invaluable source of early guidance, which should be supplemented by advice from an acoustician within the applicant's consultant team if required."

- The policy should **define the maximum allowable noise levels in dBA** as measured at a specific **distance** from the **sound source** at all times of day or night.

Green infrastructure

The policy does not provide guidance on the **amount of communal open space** for residents of a **development of Multiple Dwellings** (Blocks of Flats). There should be an **allocation of 'space per resident'** to ensure **an appropriate amount of communal open space per development** based on the **number of occupants** within the **development site area**.

2.2.5 Connectivity and access to local services

*“When optimising site capacity, boroughs are encouraged to consider levels of **future provision of infrastructure**, in addition to **existing infrastructure** (London Plan Policy D2). An optimum capacity and density will be one where development takes full advantage of a site’s current and future planned connectivity by public transport, walking and cycling to enhance access to employment and services, both in the immediate area and through the public transport network. This also requires ensuring that the connectivity between the site and its local surroundings, including transport nodes, is maximised through the design and layout, as well as through changes to the walking network where appropriate. Boroughs should make certain that the **density of a development is proportionate to the connectivity available to future residents**. This will ensure that as many of London’s new homes are in well-connected locations as possible.”*

- On what methodology are the **WebCAT Connectivity Assessments** used to assess **local services requirements** (e.g., GP Surgeries, school places etc.)?
- What is the definitive relationship between **PTAL** and appropriate **Densities for the designated areas** since the density matrix has been removed from the policy?
- What methodology is to be used to evaluate **“connectivity to a range of opportunities and services”** for residents to have appropriate access to social infrastructure?
- Is this just a **‘subjective’** analysis or is there a **defined methodology** to determine the availability of **infrastructure requirements**?
- How does this analysis meet the requirement of **NPPF paras 16 and 122**?
- How would applicants be sure of their development proposals meeting these requirements if the requirements are **‘subjectively defined’**? (NPPF Para 16 d.).

2.2.6 Infrastructure Capacity

Establishing an appropriate optimum **site capacity** requires **detailed** consideration of the adequacy and **potential of existing and planned infrastructure provision to support good growth** (London Plan Policy D2) ^[4]. An evaluation of infrastructure capacity should extend beyond transport connectivity to consider other forms of infrastructure and its impact on quality of life, such as **energy, water, waste, digital and smart technologies, social and green infrastructure**. Optimising capacity requires the development of a form and scale that corresponds to the potential of existing and future infrastructure, and that is able to sustain existing infrastructure or enable infrastructure enhancement.

However, the Policy States:

“Minor developments will typically have **incremental impacts** on **local infrastructure capacity**. The **cumulative demands on infrastructure of minor**

[4] **London Plan Policy D1B Optimising site capacity through the ‘Design-Led Approach’.**

development should be addressed in boroughs' **Local Plans**, IDPs and Programmes (and funded for example by planning obligations)."

"Therefore, it will not normally be necessary for minor developments to be supported by infrastructure assessments. Boroughs should also **not need to refuse permission** to these schemes on the grounds of **infrastructure capacity** if necessary and proportionate contributions towards the cost of supporting infrastructure are planned and secured."

How are the requirements for the evaluation of **infrastructure capacity** and its impact on quality of life, **such as energy, water, waste, digital and smart technologies, social and green infrastructure** evaluated? What are their **capacity parameters**?

The Local Plans are drawn up by Spatial Planning Departments of an LPA who do not have any control over the Utilities' forward planning processes, to provide additional services such as energy, water, waste, digital and smart technologies to local areas.

So what mechanisms are you proposing that brings these local **'Utilities'** service providers, expansion plans and Programmes within the shared responsibilities of an LPA for inclusion in their boroughs Local Planning Processes?

However, it is extremely unlikely that 'CIL' or other funding by a developer of small in-fill or windfall site development would contribute sufficient funding to adequately support the long-term costs of improved infrastructure for a site to meet a **sustainable infrastructure requirement**.

if **"infrastructure capacity"** is NOT secured or supported by any method, then a capacity assessment would be required – **but a mechanism for doing so has NOT been defined!**

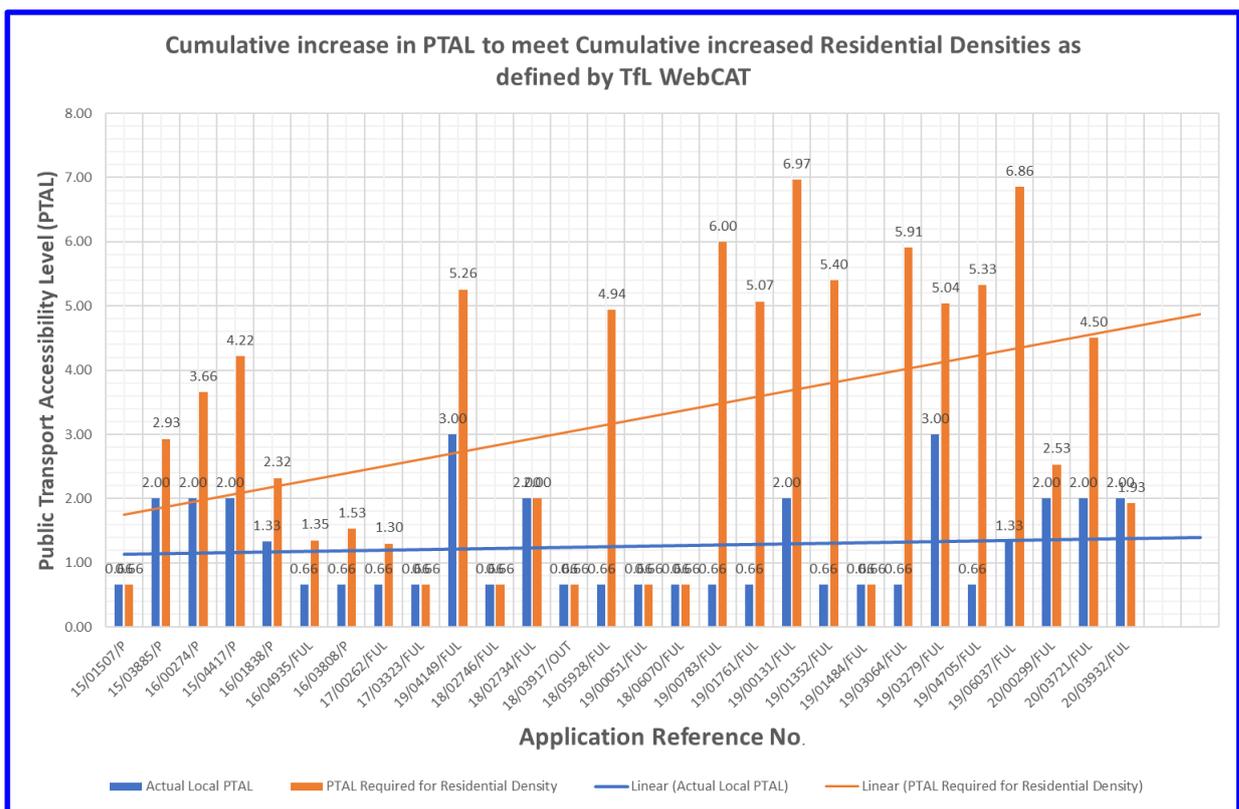
This is a **significant failure of the proposed policy** as **incremental impacts** resultant on **year-on-year minor developments** in areas of **very low PTAL (<3)**, **cumulatively** increases **residential densities** without any **commensurate increase in any supporting infrastructure** (Public Transport Accessibility or other public services' infrastructure).

- There is **'no Policy limit'** on the densities of **in-fill or windfall** site **minor re-developments** for **low PTAL (<3) suburban** development proposals;
- The statement that **"boroughs should not need to refuse permission on grounds of lack of infrastructure capacity"** totally **undermines** any local residents' objections to such **high-density** planning proposals in their locality;
- This is a **significant reason** for local residents' **TOTAL loss of confidence in the planning process.** ^[5] (See Histogram below).

[5] See: <http://www.mo-ra.co/planning/planning-complaints/>

From **‘Local Residents’ perspective**, the Policies do NOT ensue that **“cumulative”** small site developments have **Sustainable Infrastructure Support** as these small site developments are **assessed individually** and each contributes to a **cumulative lack of supporting infrastructure**. The fact that these small sites are **excluded** from the **“Design-Led Approach”** means that **year-on-year cumulative piecemeal and windfall site re-developments will** (and has already in our area) resulted in **unsustainable public infrastructure** to support these increased **cumulative developments**, including **Public Transport Accessibility** and this contributes to the **general loss of confidence** in the planning process by **local residents**.

There is **no policy or methodology to actually refuse any high density in-fill or windfall site development proposal** in **suburban residential areas** as there are **no defining limiting factors** which could be the **subject of a refusal** which will add to the current **loss of confidence in the planning process by the many affected local residents**. [6]



Recent Actual MORA Post Code Area Cumulative Developments without any improvement in Public Transport Accessibility based on TfL WebCAT assessment.

This results on a requirement for increased PTAL trending toward ≈ 5 when the local PTAL is actually nominally ≈ 1.4 , without any prospect of improvement in public transport (or other) infrastructure resulting in TOTAL loss of confidence [4] in the Planning Process by local suburban residents.

[6] See: <http://www.mo-ra.co/planning/planning-matrix/>

- The main reason for residents in suburbia **losing confidence** in the planning process is the **demolition of family homes, replaced with high density blocks of flats** with footprints covering most of the site area, with extremely limited parking and amenity space, and with no (or inadequate) play space for children of future occupants of the development, in their suburban residential localities, totally changing the character of their locality.

2.2.7 Deliverability

*“Optimum site capacity will be achieved where an understanding of **deliverability** is used by boroughs to promote strategies **that ensure that housing and any required supporting infrastructure can be delivered at the appropriate time**, scale, form and use intended during site allocation.”*

There is no defined methodology for assessment of infrastructure delivery by service providers which precludes an optimum site capacity being achieved. (NPPF Para 35 & 122)

3 STAGE TWO: USE OF RESIDENTIAL BUILDING TYPES

3.1 Residential Building Types

On the basis of these statements, a proposed development would need to reflect the **“Residential Build Type”** prevalent in the locality. Thus, a **“block of flats”** would be an **inappropriate development** proposal in a locality of **detached and semi-detached houses or bungalows with substantial gardens** in order to reflect the **“Characterisation Assessment Design Code”** of the locality. if not, **what is the point** of the **Characterisation Assessment Design Code?**

3.2 Types

No Comment as these are assessments of various existing “build types”.

General Comments Module A:

- a) Module A only contains **‘objectives’** which are NOT defined Policies which need to be met for sustainable developments.
- b) There is no **definitive requirement** for access to back-land development proposals; (accessed between existing dwellings fronting a highway).
- c) Development proposals for ‘back-land’ in-fill should require adequate emergency access, with wide enough driveway (and pedestrian) access for emergency vehicles and pantechnicons for furniture delivery for new occupants, to gain nearest access to the proposed dwellings.
- d) There should also be a specific requirement for a vehicle **‘Turning Head’** to ensure capability of vehicles exiting in a forward gear, assuming all parking spaces are ‘full’.
- e) Swept path diagrams should be required to prove all vehicles parked can exit the site in a forward gear if all other parking bays are occupied.
- f) There is no policy definition for refuse & recycling requirements which should include maximum bin pull distances from storage to refuse vehicle and dimensions of bin “pull” pathway etc.

Module B

Small Housing Developments

Assessing Quality and Preparing Design Codes

2.2 Small Housing Developments

Small housing developments: residential developments on sites up to 0.25 hectares. *“This may include new build; infill development on vacant or under-used sites; upward extensions of existing buildings (including non-residential developments); residential conversions, redevelopment and extension of existing sites.*

*Small housing developments offer an opportunity to **increase optimum residential density of an area** while providing Londoners with homes that are respectful of local character. Boroughs are responsible for promoting good design, and proactively increasing housing provision, through small housing developments. These can be delivered through the use of plan-making and decision-making informed by area-wide **design coding**, masterplans and site-specific design briefs (London Plan Policy H2 B).”*

- What is the complete “format” of a ‘Design Code’ that defines the optimum residential density of an area? (i.e., what is the formula).
- To increase optimum residential density of an area requires the availability of supporting infrastructure at the outset. Where is this defined?
- Infrastructure is required to support development rather than provision of development prior to provision of supporting infrastructure – which might NOT be forthcoming.
- Without some measure of evaluating density with respect to the available infrastructure, there is no limit to guide applicants on what would be an appropriate acceptable increase in density. (See NPPF para 122)

3.1 Small housing development conditions

Backland conditions: *“site behind development, commonly underused rear land and in some case brownfield land.”*

As stated earlier for Module A: there is no defined access requirements listed:

- a) There is no definitive Policy requirement for access to back-land development proposals; (access between and behind existing dwellings).
- b) Development proposals for ‘back-land’ in-fill should require adequate emergency access, with wide enough driveway (and pedestrian footpath) access for emergency vehicles and pantechnicons for furniture delivery for new occupants, to gain nearest access to individual new dwellings. These parameters need specifying.
- c) There should also be a specific requirement for a (delivery) vehicle ‘turning head’ to ensure capability of exiting in a forward gear, assuming all on-site available parking spaces are ‘full’. (Exiting in reverse gear should be avoided by policy requirement).
- d) Swept path diagrams should be required to prove all vehicles parked can exit the site in a forward gear if all other parking bays are occupied.

- e) There is no policy definition for refuse & recycling requirements which should include maximum bin pull distances from storage to refuse vehicle and dimensions of pull-pathway etc.
- f) The illustrations on page 15 do NOT give any indication of Policy requirements for access e.g.
 - Minimum width of access drive (for emergency vehicles and removal lorries);
 - Maximum Length of access drive (from fire hydrant);
 - Maximum length of bin pull distance for refuse & recycling bins;
 - Dimensions of visibility splays at entrance;
 - Distances prior to or between vehicle passing bays.
- g) There needs to be minimum separation distance between new and existing developments facing windows;
- h) There needs to be minimum overlooking such as a 45-degree rule for horizontal and vertical intersection projection from an existing dwelling intersecting a proposed new development;
- i) Gardens should be **retained** for the benefit of the environment but if back-garden development is allowed, there should be a minimum required retention of garden length or area for the retained host dwelling and a minimum garden area or length for the new dwelling which should be specified.
- j) For back garden developments a requirement for access should not be at the expense of loss of access or parking space to the host property.
- k) There should be a **re-evaluation (proportionate reduction) of Council Tax** for **all affected** existing dwellings (as council tax as valued (by VOA) is on the basis of property value and amenity of the dwelling – both of which would be reduced by the new ‘back-garden’ developments.

3.2 Assessing the potential for small housing developments.

Fig B.3

“Figure B.3 shows a high street (shaded red) of a town Centre. The other shaded areas have been identified as being able to accommodate three potential forms of small housing development: **street-facing upward extension (blue)**, **street-facing infill (green)**, and **demolition and redevelopment (yellow)**. A design code could be produced for each of these types (Module B, Section 2.4).

Where small housing development occurs in street-facing conditions, design codes should emphasise guidance in relation to frontage line, front-to-front distances, building heights and rear building line projects (Section 3.3.1-3.3.4). **For backland conditions, design codes should focus on guidance related to light and privacy, building heights and roof form (Section 3.4.1-3.4.3).**”

What exactly is the format, formula or definition of a **“Design Code”** for e.g. small housing development: street-facing upward extension (blue), street-facing infill (green), and demolition and redevelopment (yellow) that **could be enforced**?

- A ‘Design Code’ seems to be an abstract **‘subjective description’** of the build character of a location. There is no **defined parameter or construct** to define the **code** or could be used to **enforce a proposal to meet the requirement**.

- A Design Code does NOT have a specific definition or parameter which applicants can interpret and assess to define an **appropriate density** of a proposed development (see NPPF Para 16 and 122).
- For small in-fill and windfall sites, applicants would have difficulty defining the appropriate **'Design Code'** in order to provide the **appropriate densities** of a proposal for a locality.
- It is unlikely that any local resident or Residents' Association could determine the appropriate **'Design Code'** for a locality and engage with the LPA on appropriate developments for a locality – this could further **alienate local residents from engaging in the Planning process** or to help residents **regain confidence in the planning process**.

3.3 Street-facing conditions

“On a street-facing plot, the character of the existing street scene will closely inform the relationship between the proposed development and the existing surrounding buildings. This character will guide formal considerations such as frontage line, front-to-front distances, building heights, rear projections and roof forms.

The same considerations will apply to a variety of street-facing site types:

- Conversions of houses into flats
- Additions to the front or side of an existing property or within the curtilage of one
- Demolition and redevelopment of existing homes
- Redevelopment of flats and non-residential buildings with a street-facing condition.”

The requirement to **“closely inform”** and **“guide formal considerations”** are **‘meaningless’ subjective assessments**. Why not state that proposed developments should follow **existing established ‘building lines’ and ‘sight lines’ (especially at junctions and corners)?** The proposed requirement statements of **“closely inform”** and **“guide formal considerations”** would present legal difficulties in the event of a legal challenge of an assessment.

3.3.1 frontage line

As stated under 3.3 above (building Lines).

3.3.2 Front-to-front distances

“Where small development infills a plot within an existing street, front-to-front distances will be governed by the character of the existing street and associated frontage lines. Where small housing developments can create a new streetscape, the street width (i.e. the separation distance between two facing building elevations) should generally be no less than the height of the facing buildings. This distance could be reduced if further testing of proposals and innovative design responses (e.g. articulated rooflines) can demonstrate that good levels of daylight, sunlight and privacy can be achieved.”

The statement: *“This **distance** could be reduced if further **‘testing’** of proposals and **innovative design responses** (e.g. articulated rooflines) can demonstrate that good levels of daylight, sunlight and privacy can be achieved”* is a **subjective assessment**.

This assessment requires a **definition** to describe the **methodology** for assessing the appropriate **testing procedure** such that applicants and case officers are aware of the **criteria** appropriate to establish the acceptable daylight, sunlight and privacy afforded in terms of available light (BRE) and distances and the **methodology of testing**.

Fig B.5 Frontage distances, Terraced

- This figure (B.5) illustrates a proposed **“acceptable”** rear garden development of host terraces with **absolutely no amenity space for the new dwellings** and an indeterminate (minimum) set-back from the host existing terraced properties.
- It does not define the **minimum** requirements of the retained garden for the host properties.
- This also illustrates a loss of garden and green space and significant unquantified increase in housing and residential **density** for the combined site area and does NOT relate this **higher density** with any commensurate increase in **supporting infrastructure**.
- With only 7m separation for access between terraced buildings this would create unacceptable overlooking and invasion of privacy?
This proposal would be unacceptable to most local affected residents and would warrant a significant reduction in the ‘Council Tax Bands’ for the affected existing local affected residents.

3.3.3 Building Height

Fig B.6

Case Study D3.4 Two Family Houses

- This illustration, if on a corner plot, does not follow the return building line.
- It also results in blocked sight lines for traffic at the junction?

Para 3.3.4 Rear Building Line projection

Fig B.7 Rear Building Line projection, semi-detached (depth)

The intersection of the **45-degree projection** should **NOT** intersect the proposed development. It either **clears the proposed development** or it **intersects and fails the proposed development**. It cannot **marginally** fail as once a development has been accepted at a **marginally non-compliance**, there is no definition of how **‘marginally’** a deviation would be **acceptable** and thus the Policy becomes void and unenforceable (as has been used in some approval decisions by Croydon LPA).

There is (or should be) NO tolerance allowable on the 45-degree policy. It either **fails or doesn’t fail** the policy.

3.4: Backland conditions

Fig B.9 Backland conditions, relationship with existing buildings (terraced)

This illustration (B.9) does not show any **minimum dimensions** of required access to **back-land developments**.

It does not consider any **vehicular access, parking or turning head requirement**.

It does not quantify any minimal **retained garden area** for the host dwelling.

3.4.1 Daylight, sunlight and privacy

- *“Orientating new homes so they are directed away from existing neighbouring homes*
- *Using courtyards to provide aspect to outdoor spaces and to bring in daylight (care should be taken to ensure that emission sources, such as boilers, are positioned to avoid accumulation of air pollution in courtyards)*
- *Using rooflights to bring light into the home*
- *Screening windows and amenity spaces to avoid direct overlooking.”*

There is no specific guidance to ensure new homes are directed away from existing neighbouring homes – **too subjective**;

Use of courtyards: –

- The policy does not specify minimum daylight requirement or refer to BRE specifications or recommendations;
- The policy does not preclude boiler flue discharge into enclosed courtyards.

The Policy does NOT specify minimal separation distance between facing habitable rooms (previously 18m minimum perpendicular or a minimum 45-degree distance).

The Policy does NOT specify 45-degree vertical or horizontal angular separation.

The policy does not define a specification for screening of windows and/or amenity spaces to avoid direct overlooking – again all too subjective.

3.4.2 Build Height

The Policy for build height is too **subjective and vague**.

For Backland (within the existing curtilage) development proposals, the policy should define the build height in relation to the existing host dwelling and be subservient to the host by a **‘defined amount’**.

3.4.3 Green cover

*“For small developments (Less than 10 Units) There should be **NO Net Loss** of green cover.”*

Thus, for in-fill and windfall re-developments requiring demolition of existing dwellings with a large garden area (green cover) the **new build footprint** should be the same or of similar dimensions as the demolished structure footprint to ensure there is **NO Net Loss of green cover!** This has not been the case for any of our recent approved local developments.

3.4.4 Roof form

New development Roof forms should reflect the predominant roof types of the immediate locality (hipped or gabled etc) in order to reflect and blend with the local character and street scene.

4 Example Design Codes for Small Housing Developments

“As a minimum, developments should adhere to ALL relevant London Plan policies including minimum space standards.”

4.1 street-facing upward extension

4.1.1 Site type description and analysis

This illustration (para 4.1.1) shows an in-fill development between existing terraced housing. However, many of this type of existing terraces have regular access breaks to rear gardens some of which provide access to garages in their rear gardens which reduces the need for local on-street parking.

4.1.2 Key Principles

Any development should ensure that proposals respect the character of the locality and do not destroy the historical street scene.

4.1.3 Design code performance against housing design standards

General Comments

- These Design Codes (C1 to C7) are general statements of development options without any specific **quantifiable parameters** to define acceptability or otherwise.
- The list does not quantify or clarify the proposed London Plan Policies.
- The list does not contain any requirement for supporting infrastructure to support these high-density development proposals.

4.2 Street-facing infill within underused in-curtilage site.

4.2.1 Site type description and analysis

- This illustration (para 4.2.1) is rear-garden development with net loss of garden area. There is undefined loss of green space.
- The proposed development does NOT follow the front building line at the street frontage (key 1).
- There is no specified defined retained minimum garden area for the host property (key 2)
- There is no allocation of amenity or garden area for the proposed development (key 3)
- There is no space between proposed development and SE boundary to minimise overbearing and loss of daylight to the existing adjacent dwelling and would **fail** the 45-degree rule.
- Similar comments to the diagram for “potential opportunities”
- These undermine the **“Good Design”** objectives of the London Plan.

4.2.2 Key Principles

- 1 Retention of sufficient private amenity space for residents of the host dwelling – but not quantified or defined. (should be in the policy)
 - 2 Frontage line of proposal should be in line with garden wall to maximise use of site footprint – still does not follow the building line.
 - 3 Proposal should be subservient to surroundings in height. – but the proposal would undoubtedly fail the 45-degree rule vertical projection from the centre of the existing rear ground floor habitable room (as it is built up to the boundary with the adjacent property).
 - 4 First floor should be set back from the street frontage – but is NOT following the established building line.
 - 5 No comment
 - 6 Failure of 45-degree rule.
- Proposal should be refused on grounds of non-compliance to policies!

4.2.3 Design Code performance against housing design standards

- Loss of green space
- Quantify retained garden for host dwelling
- No amenity space garden for proposed development
- No communal open space for residents of proposed development.
- Failure of 45-degree rule horizontal and vertical.

Module C

Housing Design

Quality and Standards

1.4 How to use this Module

“This module presents a set of housing design standards for use when designing or assessing new housing. Quality of life for residents is at the heart of this guidance and runs as a ‘golden thread’ throughout. The guidance is based around eight key themes covering the scale of the neighbourhood through to the scale of the home. Qualitative descriptions and technical standards are provided in order to set a benchmark for the highest quality housing developments....

As well as underpinning the capacity methodology and small sites design code preparation, the standards serve as a stand-alone guide for delivering great housing and great city-making at all scales. In reality, all of these standards are interrelated and should not be considered in isolation. Instead, they should all be considered in the round with a view to producing a holistic design that will deliver a comfortable, healthy and high-quality environment, as well as meeting compliance requirements. It should be noted that some of these factors could pull in opposite directions. It is therefore recommended that a single party, typically the architect, takes ownership of reviewing all of these factors early in the planning stage.”

C1 Shaping Good Places

C1.1 Response to Character and Context

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

C1.1.1 proposals should demonstrate:

“How the design responds to its physical context. This includes the character Development of the area and the local pattern of buildings, public space, landscape and topography.

How the scheme relates to the identified character of the place and to the local vision and strategy. Or, how bolder change is justified in relation to a coherent set of ideas for the place as expressed in the local vision and strategy.”

The analysis of **“how the design responds to its physical context”** with respect to the local area, would be a **‘subjective’ assessment or interpretation** of the **“characterisation studies”** for each locality, by the case officer evaluating the proposed development. How does this evaluation affect the application viability of the decision-making process and on what basis could this decision be challenged if the case officer is minded to refuse the application on these grounds?

C1.1.2 Development proposals should demonstrate:

“How the scheme complements and links into the local network of public spaces, including how it integrates with existing streets, paths and ecological links.

That public spaces and pedestrian routes are designed to be overlooked and safe, and how blank elevations onto the public realm at ground floor have been avoided.”

Similarly; The analysis of **“How the scheme complements and links into the local network of public spaces”** with respect to the local area, would be a **subjective assessment** of the **“characterisation studies”** for that locality, by the case officer evaluating the proposed development. How does this evaluation affect the application viability of the decision-making process and on what basis could this decision be challenged if the case officer’s assessment was to challenge the proposal, but on what grounds could it result in a refusal?

Relevant London Plan Policies: GG1, D1, D3

Policy GG1 - Building strong and inclusive communities; only provides **‘objectives’** – it does **NOT define** any **Policies** which could withstand a legal challenge.

Policy D1 - London’s form, character and capacity for growth; only provides **‘objectives’** – it does **NOT define** any Policies which could withstand a legal challenge.

Policy D3 Inclusive design - only provides **‘objectives’** – it does **NOT define** any Policies which could withstand a legal challenge.

None of these **“objectives”** could support reasons for **acceptability or otherwise** of a proposal.

C1.2 Topography

C1.2.1 *“Development proposals should take advantage of any level changes to optimise the full potential of the site. They should also achieve efficient internal and external access arrangements and optimise urban greening and sustainable drainage (see C6.2 and C6.3) whilst ensuring an accessible and inclusive scheme in terms of inclusive design (see C2.2).”*

Any finished floor levels are normally defined by an applicant including any internal/external access arrangements. The policy **should define** any 'limits' of finished levels and access arrangements that need to be met by applicants, as the requirement *"to take advantage of level changes"* is an undefined subjective observation which does NOT define the policy and could **NOT indicate a policy requirement** and as such are not therefore **enforceable** statements.

Relevant London Plan Policies: D1

Policy D1 - London's form, character and capacity for growth; only provides '**objectives**' – it does NOT **define** the requirements or **limits** of any Policies which could withstand a legal challenge. It was understood that the SPG would clarify the London Plan specific requirements.

C1.3 Land Use Mix

C1.3.1 "Development proposals should demonstrate how the mix of uses meets strategic and local borough needs."

How, and on what grounds can an LPA influence a proposed development mix of uses of a site locality to meet a borough's housing need unless the stated policy categorically states the mix required for that locality?

A Developer's proposal for a site is based upon a judgement by the developer on the best marketable viable development for that site in that location. A proposal is not based on a strategic requirement to meet the stated proportion of the borough's housing needs.

The assessment by the LPA of a proposal's propensity to meet the strategic requirements of the borough for that specific development is the contribution it makes to the compiled statistics of the strategic requirements as defined by the LPA but is unlikely to require a developer to reconsider the type of proposal submitted **unless there is a stated quantifiable policy mix for that specific site location.**

C1.3.2 "Residential proposals should be designed to avoid compromising the day-to-day functioning and long-term viability of adjacent nonresidential uses, in accordance with the Agent of Change principle (London Plan Policy D13)."

Policy D13 Noise -para 3.12.2 Agents of Change principle.

The definition of Policies to ensure mitigation of compromising day-to-day noise disturbance affecting functioning and long-term viability of adjacent residents should be fully defined in the London Plan policy definitions, including all applicable parameters, with defined limits such that applicants can be fully aware of the need to meet the policies.

C1.3.3 Development proposals that combine different uses should be designed to protect the quality of home life through careful consideration of noise mitigation, refuse collection, services, parking arrangements and access routes to homes and amenity spaces.

See response to 1.3.2 above.

"careful consideration of noise mitigation, refuse collection, services, parking arrangements and access routes to homes and amenity spaces" - is NOT a specific

enough policy. These requirements need to be specifically defined parameters in the Policies such that applicants are fully aware of the need to meet the requirements and limitations of the Policies in their proposals.

Relevant London Plan Policies: GG5, SD5, SD6, D13. E1, E2, E3, E4, E7, E8

Policy GG5 Growing a good economy– uses terms such as **“promote”** and **“ensure”** objectives but does not define any specific requirement as policies – too subjective.

Policy SD5 Offices, other strategic functions and residential development in the CAZ Policy – uses terms such as **“should not compromise”** or **“give greater weight”** which are subjective and unenforceable.

Policy SD6 Town centres and high streets – uses terms such as **“encourage”**, **“resilient”**, **“inclusive”** etc which are **objectives**, **NOT** policies.

Policy D13 Noise – uses term such as **“reduce”**, **“manage”**, **“mitigate”** again, which are subjective objectives, **NOT** policies which could be enforced.

Policy E1 Offices – uses terms such as **“quality”**, **“flexibility”**, **“adaptability”** again, which are subjective objectives, **NOT** policies which could be enforced.

Policy E2 Providing suitable business space – uses terms such as **“fit for purpose”**, **“demonstrate”**, **“ensure”** again, which are subjective objectives, **NOT** policies which could be enforced.

Policy E3 Affordable workspace – the policies are left to local boroughs to define.

Policy E4 Land for industry, logistics and services to support London’s economic function policies - are left to local boroughs to define.

Policy E7 Industrial intensification, co-location and substitution policies - are left to local boroughs to define.

Policy E8 Sector growth opportunities and clusters policies - are left to local boroughs to define.

None of these London Plan “Policies” provide defined specifications of requirement or any criteria of the appropriate parameters or their tolerances to define the acceptability or otherwise of the quoted Policies, they are ALL **subjective ‘objectives’ that could NOT withstand a legal challenge if required to do so.**

It is understood therefore that these requirements would be defined in each London Borough to include the detailed specification of requirements in their Local Plans, but that would mean the policies could be different across all London Boroughs which would make it extra difficult for developers who could be making proposals within many local boroughs, which all need to have various compliant proposals across London.

C1.4 Open spaces

C1.4.1 Development proposals should **demonstrate** that they comply with the borough’s open space strategies and policies. They should ensure that an analysis of surrounding open space is undertaken and that opportunities to address a deficiency in provision by providing new public open spaces, or creating links between networks of open space, are taken forward in the design process.

The policy should **define** the appropriate amount of open space in **m² or hectares per 1000 residents** and the availability by **distance** (maximum) from the proposed development to the nearest open space, commensurate with the **population density** that will have access to this defined Local Open Space.

C1.4.2 For developments where **10** or more children and young people are expected to live, development proposals **should** make appropriate play and informal recreation provision in accordance with **London Plan Policy S4**. The GLA Population Yield Calculator should be used to calculate the expected number of children and young people likely to live in the development. Children's play space should be designed to be stimulating and incorporate greenery, be overlooked to enable passive surveillance, be accessible to all tenures and be safely accessed from the street by children and young people independently.

At last; Policy S4 defines a requirement specified at 10m² per child play space for children of the occupants of a proposed development. It also provides a reference to the GLA population yield Calculator to calculate the expected number of children likely in a proposed development.

However, **"should"** gives credence to not delivering the policy. Under what circumstances **shouldn't** this policy be required?

C1.4.3 Where **Communal Open Space** is provided, development proposals should **demonstrate** that the space meets the qualitative design aspects identified in London Plan Policy **D6** (Table 3.2) (see guidance in Section 3).

London Plan Policy D4 Housing quality and standards contains Table 3.2 - Qualitative design aspects to be addressed in housing developments (NOT Policy D6).

The amount of **Communal Open Space** required of a development proposal should be determined on the **amount of space required per occupant**. How could it be **"demonstrated"** that the amount of space meets the requirements of Table 3.2 as this would be a **subjective** evaluation. What therefore would be an **acceptable demonstration?**

Policy D4 Table 3.2 does not provide any quantifiable defined design requirements, it only lists objectives and does not specify any definition, limits or tolerances of design parameters required of a development proposal.

e.g. the following **'meaningless statements'**:

Item v): **"Private amenity space for each dwelling should be usable and have a balance of openness and protection, appropriate for its outlook and orientation"**.

This **does not specify its requirements in dimensions or orientation etc.**

Item vi): **'sufficient'** is a **subjective objective assessment** which could not withstand a legal challenge if required to do so.

Relevant London Plan Policies: **GG3, GG6, D5, D6, S4, G1, G4, G5, G6, G7, G8, SI 1, SI 13.**

Policy GG3 Creating a healthy city

Policy GG6 Increasing efficiency and resilience

Policy D5 Accessible Housing (other than Para A 1)

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

Policy S4 Play and informal recreation
Policy G1 Green Infrastructure
Policy G4 Open Space (**other than Table 8.1**)
Policy G5 Urban greening (**other than para 8.5.4 & Table 8.2**)
Policy G6 Biodiversity and Access to nature
Policy G7 Trees and woodlands
Policy G8 Food growing
Policy SI 1 Improving Air Quality
Policy SI 13 Sustainable drainage'

A General Observation of these Policies indicates that rarely do they specify a quantifiable definition of requirement (other than those identified in the list above). It was understood when commenting on the Draft London Plan for EiP that the Supplementary Planning Guidance (SPG) would provide definitive detail and guidance on the parameter specifications to support the various sections of the new London Plan – but generally this has not been achieved.

C2 Design for a Diverse City

C2.1 Diversity of Residential type and tenure

C2.1.1 Development proposals should **demonstrate** how the mix of dwelling sizes and the mix of tenures meet strategic and local borough targets, and how they are appropriate for their location in London.

C2.1.2 Development proposals should **demonstrate** that housing of different types and tenures in a scheme have been fully integrated, and that the quality of architecture and materials is consistent across all tenures.

What would be an acceptable method of **'demonstrating'** required compliance to policies C2.1.1 and C2.1.2?

The location should have had a 'Character Assessment' which presumably defines the residential type and 'Design Code' appropriate for the locality. How is this subsequently affected by the strategic and local borough targets? Do the 'targets' override the 'Characterisation Study'?

Relevant London Plan Policies: **GG1, GG4, D2, D5, D7, H2, H5, H6, H7, H10, H12.**

Policy GG1 Building Strong and inclusive communities
Policy GG4 Delivering the homes Londoners need
Policy D2 Delivering good design
Policy D7 Public Realm
Policy H2 Small Sites
Policy H5 Delivering affordable housing
Policy H6 Threshold approach to applications
Policy H7 Affordable housing tenure
Policy H10 Loss of existing housing and estate redevelopment
Policy H12 Housing size mix
Policy GG1, GG4, D2, D7, H2 are **all objectives** (other than Table 4.2 – Targets)
Policy H12 are **objectives not defined policies**.

C2.2 Accessible housing and inclusion.

C2.2.1 Development proposals should **demonstrate** how they have been designed to meet the needs of a diverse population, including disabled people, older people and families with young children, in terms of wider site arrangements, adopting an inclusive design approach, and the provision of accessible housing, in the form of both accessible and adaptable housing and wheelchair user dwellings.

C2.2.2 Development proposals should **demonstrate** how they have been designed to accommodate the travel needs of disabled residents, including through designing inclusive street environments and access to public transport networks, and the provision of disabled persons car parking.

In what form would this '**demonstration**' be? And what **criteria** is required to be met to **demonstrate** a proposal meets the needs of a diverse population including the disabled, the elderly and families with young children, in terms of wider arrangements and the access to public transport networks etc.?

Without defining these criteria, this policy is **meaningless**; It is just an **objective** that has no defined criteria to establish compliance to enforce the policy.

What proportion of a proposal should be accessible for wheelchair users and how is access to public transport networks measured?

When would lifts be required for flats (how many floors)? References to any other appropriate requirement documents should be stated – such as Building Regulations references.

Relevant London Plan policies: DG1, D5, D7, S4, S6, T6.1, T5

Policy DG1 – **Not found** in 'Draft London Plan – consolidated changes version – clean July 2019.

Policy D5 Accessible housing – Table 3.2 and refers out to Housing Standards Building regulations M4 - 10% of dwellings (M4(3) should meet wheelchair user requirements.

Policy D7 Public Realm – No comment

Policy S4 Play and informal recreation – only defines Play Space for children. It does NOT specify '**Communal Open Space**' allocation requirement for a multiple dwelling development proposal based upon **site area** and **number of future occupants**. Also, does not define requirements of '**safe**' Play Spaces for children e.g. within '**line of sight**' of the living accommodation.

Policy S6 Public Toilets – for large scale development sites (**how large scale?**) the policy does NOT define the relationship between the development Residential Density and the appropriate quantity of public toilets and any relationship between numbers of male & or female toilets.

Policy T.6.1 Residential Car Parking – requirements set out in **Table 10.3** along with other guidance.

Policy T5 Cycling – Requires appropriate levels of cycle parking, Defined in Table 10.2

C3 – From Street to Front Door

C3.1 Access and Servicing

C3.1.1 Development proposals should ensure that all main entrances to houses, ground floor flats and communal entrance lobbies are visible from the public realm and clearly identified.

C3.1.2 Development proposals should ensure that the number of dwellings accessed from a single core does not exceed eight per floor. Deviation (by exception) from this requirement will need to be justified and mitigated by maximising corridor widths (beyond 1500mm) and introducing natural ventilation/daylight to corridors.

C3.1.3 Development proposals should ensure that communal refuse, recycling and food waste containers, communal bin enclosures and refuse stores are easily accessible to and usable by all residents including children and disabled people, and located on a hard, level surface. The location should satisfy local requirements for waste collection and, if within buildings, should be positioned to limit the nuisance caused by noise and smells, and provided with means for cleaning.

C3.1.3 Describes requirements for 'easy accessibility' but should specify minimum dimensions of storage space and door openings for bin removals without obstruction.

Should also define the maximum pull distance from storage to refuse collection vehicle for refuse operatives.

C3.1 Requires more specific detail of the policies to ensure policies are enforceable.

Relevant London Plan Policies: D1, D5, D6, D8, S17 (S17), T7

Policy D1 London's form, character and capacity for growth – mainly **objectives** and little specification of definition of requirements. It was understood the SPG modules would clarify the implementation of these policies, not just repeat the objectives.

Policy D5 Accessible housing – Table 3.2 and refers out to Housing Standards Building regulations M4 - 10% of dwellings (M4(3) should meet wheelchair user requirements.

Policy D6 – has been replaced by **Policy D1A and D1B** See comments on Module A.

Policy D8 – Tall buildings

Policy S17 - Not found in 'Draft London Plan – consolidated changes version – clean July 2019. Could be **Policy S17 Reducing waste...**

Policy T7 Deliveries, servicing and construction – Does not specify any requirement for access to back-land residential developments.

C3.2 Safety and Security

C3.2.1 Development proposals should **demonstrate** that they are safe and secure, and that they design out opportunities for crime and anti-social behaviour.

C3.2.2 Development proposals should **demonstrate** that they achieve the highest standards of fire safety, identify unobstructed outside space for fire appliances which is also appropriate for use as an evacuation assembly point, and provide suitable and

convenient means of escape and an associated evacuation strategy for all building users.

What criteria is required to demonstrate compliance, acceptability or otherwise to the stated requirements?

Relevant London Plan Policies: D1, D5, D6, D11, D12.

Policy D1 London's form, character and capacity for growth – mainly objective but little definition of requirements. It was understood the SPG modules would clarify the implementation of these policies, not just repeat the objectives.

Policy D5 Accessible housing – Table 3.2 and refers out to Housing Standards Building regulations M4 - 10% of dwellings (M4(3) should meet wheelchair user requirements.

Policy D6 – has been replaced by **Policy D1A and D1B** See comments on **Module A**.

Policy D11 Fire Safety – Maximum distance of fire tender access from a fire hydrant. For Backland developments, the maximum access drive length and minimum width of access drive for emergency vehicles should be specified. Additionally, there should be provision of a turning head for exiting in a forward gear and visibility splays to ensure safety when entering the feeder road over the footpath.

Policy D12 Agent for change – Specify maximum allowed level of noise nuisance in **dB(A)** and the **distance from the source**.

C3.3 Cycle Parking

C3.3.1 Residential development should provide dedicated long-stay parking space for cycles in accordance with the London Plan and guidance in the London Cycling Design Standards:

One long-stay space per studio or one bedroom (one-person) dwelling
One and a half long-stay spaces per one bedroom (two-person) dwelling
Two long-stay spaces per two or more-bedroom dwelling.

In addition, for developments of between 5 and 40 dwellings at least two short-stay cycle parking spaces should also be provided, with at least one additional space per 40 dwellings thereafter.

C3.3.2 In line with the London Cycling Design Standards, cycle parking should be conveniently located, secure and accessible. Communal cycle stores should have an appropriate mix of stand types and adequate spacing and facilities for larger cycles. In some instances, it may be appropriate for cycle parking to be provided within individual homes, but it should be fully accessible and provided in addition to minimum space requirements and not in habitable rooms or on balconies.

Relevant London Plan policies: D5, T5

Policy D5 Accessible housing – Para L relates to on-street parking as well as cycle parking in the carriageway, **NOT on the development site**.

Policy T5 Cycling – Parking Standards given at Table 10.2

C3.4 Car Parking

C3.4.1 Residential development should conform to London Plan maximum residential parking standards as set out in Table 10.3 of Policy T6.1

C3.4.2 Careful consideration should be given to the location and organisation of car parking within an overall design so that car parking does not create barriers to walking, cycling and public transport use or negatively affect the use and appearance of open spaces. More information is provided in TfL's Parking Design and Management Plan guidance.

Applicants should '**demonstrate**' by providing '**swept path diagrams**' to prove simple manoeuvrability of ingress and egress from parking bays, when all other bays are occupied, to show parking is achievable without fouling any obstruction or entering the curtilage of other neighbours' properties. [we have had developments approved at which exiting from a parking bay requires a manoeuvre which requires mounting an access pathway and entering a neighbour's front garden within the curtilage of a neighbour's property in order to exit the development site in a forward gear – this for the life of the development].

This is the subject of a Local Government Ombudsman Complaint. ^[7]

Also, a turning head should be provided to ensure exit in a forward gear is possible.

Relevant London Plan Policies: T6, T6.1, T6.2, T6.3, T6.4, T6.5

Policy T6 Car Parking

Policy T6.1 Residential parking - Table 10.3 Maximum residential Parking standards

Policy T6.2 Office Parking – Table 10.4 Maximum Office parking standards

Policy T6.3 Retail Parking - Table 10.5 Maximum retail parking standards

Policy T6.4 Hotel and leisure uses parking

Policy T6.5 Non-residential disabled persons parking – Table 10.6 Non-residential disabled persons parking standards

C4 Dwelling Space Standards

C4.1.1 Private internal space All housing developments should meet the minimum floor space standards set out in Table 3.1 of the London Plan.

London Plan Policy D4 Table 3.1 Minimum Space Standards for new dwellings

C4.1.2 A one bedspace, single bedroom must have a floor area of at least 7.5 sqm and be at least 2.15m wide.

A two bedspace, double (or twin) bedroom must have a floor area of at least 11.5 sqm.

C4.1.3 Wheelchair user dwellings should meet the design requirements set out in Approved Document M volume 1, M4(3) (see C2 Designing for a Diverse City).

C4.1.4 Dwelling plans should demonstrate that dwelling types provide flexibility by allowing for an alternative seating arrangement in living rooms and by accommodating double or twin beds in at least one double bedroom.

[7] See: <http://www.mo-ra.co/planning/planning-complaints/>

Relevant London Plan Policies: D5, D6, D7. (should include D4)

Policy D4 Housing Quality Standards (includes minimum Internal Space Standards).

Policy D5 Accessible housing.

Policy D6 Optimising Density – Moved and combined in to **Policy D1A and D1B.**

Policy D7 Public Realm.

C4.2 Private outdoor space

C4.2.1 A minimum of **5 sqm** of private outside space should be provided for one-to-two person dwellings and an extra **1 sqm** should be provided for each additional occupant.

C4.2.2 The minimum depth and width of all balconies and other private external spaces is **1500mm**.

Relevant London Plan Policies: D6, D7

Policy D6 Optimising Density – Moved and combined in to **Policy D1A and D1B**

Policy D7 Public Realm

No Policy for **“Communal Private Outside Open Space”** appropriate for the number of occupants of a development in m² per person = allocation in (m² per person or ha/person) x bed-spaces of the development.

C4.3 Spatial quality

C4.3.1 Development proposals should create **well-considered layout** arrangements within dwellings that improve the lived experience through generosity of floor-to-ceiling heights, and spatial arrangements that optimise quality of outlook and aspect

Define what is a “well-considered layout” as too subjective and unenforceable.

C4.3.2 The minimum floor-to-ceiling height in habitable rooms is 2.5m between finished floor level and finished ceiling level.

Relevant London Plan Policies: D6.

Policy D6 Optimising Density – Moved and combined in to **Policy D1A and D1B**

C5 Home as a Place of Retreat

C5.1 Privacy

C5.1.1 Design proposals should demonstrate how habitable rooms within each dwelling are provided with an adequate level of visual and acoustic privacy in relation to neighbouring property, the street and other public spaces.

Define visual privacy as a **minimum distance** between observed and observer in any direction from the observed within a habitable room.

Define **acceptable level of daylight and sunlight** (BRE Standards) for a development proposal

Define the appropriate **acoustic attenuation in dBA** between the noise source and the receptor at a specified distance from the noise source.

C5.1.2 The layout of adjacent dwellings and the location of lifts and circulation spaces should seek to limit the transmission of noise to sound-sensitive rooms within dwellings.

Define the appropriate acoustic attenuation or noise absorption in negative dBA between adjacent dwellings. Define the appropriate acoustic attenuation in dBA between adjacent dwellings at a specified distance from the noise source and receptor via the separating wall (both sides).

Relevant London Plan policies: D1, **D6**.

Policy D1 London's form, character and capacity for growth.

Policy D6 Optimising Density – **Moved and combined in to Policy D1A and D1B**

C5.2 and outlook Aspect

C5.2.1 All new dwellings should be dual aspect, unless there are exceptional circumstances that justify the inclusion of any single-aspect homes. Single-aspect dwellings that are north facing, contain three or more bedrooms, or are exposed to noise levels with significant adverse effects on health and quality of life, should not be permitted.

C5.2.2 Where single-aspect dwellings are proposed (by exception), the design team should demonstrate how good levels of ventilation, daylight, privacy and thermal comfort will be provided to each habitable room and the kitchen.

Relevant London Plan policies: **D6**, D8. SI2 SI4.

Policy D6 Optimising Density – **Moved and combined in to Policy D1A and D1B**

Policy D8 Tall Buildings – **Impact on loss of sunlight to adjacent buildings**

Policy SI2 Minimising greenhouse gas emissions

Policy SI4 Managing heat risk

C5.3 Daylight, sunlight and overshadowing

C5.3.1 New dwellings should achieve a minimum average daylight factor (ADF) target value of 1 per cent for a bedroom and 1.5 per cent for a living room.

C5.3.2 Proposed development should maximise quality and availability of sunlight and natural light in outdoor spaces, particularly in winter. Outdoor spaces should benefit from at least two hours of daylight on 21st March into 50 per cent of space in line with BRE guidance.

C5.3.3 All homes must provide for direct sunlight to enter at least one habitable room for part of the day. Living areas and kitchen dining spaces should preferably receive direct sunlight.

This Policy statement does NOT define limits of overshadowing as indicated in the title. There is no reference to the 45-degree rule for horizontal or vertical restriction of amenity of any adjacent dwellings.

Relevant London plan policies: D1, D6, SI2. SI 4, SI2 SI4,

Policy D1 London's form, character and capacity for growth – all very **subjective**
Policy D6 Optimising Density – **Moved and combined in to Policy D1A and D1B**
Policy SI2 Minimising greenhouse gas emissions (See **Para C of SI2**)
Policy SI 4 – **NOT found** in 'Draft London Plan – consolidated changes version – clean July 2019.
Policy SI2 Minimising greenhouse gas emissions - objectives
Policy SI4 Managing heat risk

C5.4 Air quality and noise

C5.4.1 Development proposals should be **located** and designed to reduce the accumulation of indoor air pollutants and exposure of residents to air pollution

Policy should require proposal to be 'orientated' rather than 'located' as location is site limited so can only be located within the site boundary.

C5.4.2 Development proposals should be located - or attenuation measures should be introduced - to reduce the exposure of residents to noise pollution.

Any known **noise pollution** should be within **acceptable** (defined) limits in **dBa** at a measured distance from the source.

Relevant London Plan Policies: SI1, SI4

Policy SI1 Improving Air Quality – **objectives not policies.**
Policy SI4 Managing Heat Risk – **objectives not policies.**

C5.5 Thermal comfort

C5.5.1 Careful building design (including thermal mass, layout, aspect, shading, window size, glazing specification and ventilation), and landscaping and green infrastructure should be used to ensure good internal thermal comfort and avoid the need for active cooling.

These are subjective objectives, without any specific guidance on implementation. There is no way that this guidance could be enforced by case officer's assessment of a proposal or any recommended decision could withstand a legal challenge.

Relevant London Plan Policies: D3, SI2, SI4

Policy D3 Inclusive Design – Contains mainly objectives, NOT Policies. Refers out to **BS8300 Codes of Practice** for specific guidance.

Policy SI2 Minimising greenhouse gas emissions – Contains mainly objectives. Para C gives requirements which refer out to **Building Regulations 117**.

Policy SI4 Managing Heat risk - Contains mainly objectives, NOT Policies. Refer out to **Chartered Institution of Building Services Engineers (CIBSE)** 'Guidance' on assessing and mitigating overheating risk in new developments.

C6 Living Sustainability

C6.1 Environmental sustainability

C6.1.1 Development proposals should be designed in accordance with the Mayor's energy hierarchy to achieve the Mayor's Net Zero Carbon Homes policy. This means being Lean (energy efficient), Clean (exploit local energy sources and connect to heat networks), Green (maximise on-site renewables) and Seen (monitor, verify and report on energy performance).

C6.1.2 Referable development proposals should calculate and reduce whole life-cycle carbon emissions, which includes the embodied carbon in construction, by using fewer materials and low-carbon materials. Other development proposals are encouraged to do this too.

C6.1.3 Development proposals should be designed so that water fittings and appliances consume no more than 105 litres per person per day (plus up to five litres for external water consumption). Opportunities for water reuse (to reduce potable water consumption should be identified).

These are mainly descriptive objectives which are subjective and open to interpretation. They are not a definitive specification of requirement of a development.

Relevant London Plan Policies: SI2, SI3, SI4, SI5, SI7, SI13.

Policy SI2 Minimising greenhouse gas emissions – Contains mainly objectives. Para C gives requirements which refer out to **Building Regulations 117 and Figure 9.2** – The energy hierarchy and associated targets.

Policy SI3 Energy Infrastructure – these are **Objectives NOT Policy definitions**.

Policy SI4 Managing heat risks – again **Objectives NOT Policy definitions**

Policy SI5 Water Infrastructure - again mainly **objectives NOT Policy definitions**. Refers out to **BREEAM standards**.

Policy SI7 Reducing waste and supporting the circular economy – Descriptive objectives – **NOT** policy definitions.

Policy SI13 Sustainable drainage – Para C states "Development proposals for impermeable surfacing **should be refused unless** they can be shown to be **unavoidable**, including on small surfaces such as front gardens and driveways."

References to relevant case studies which are examples not policies. Under what circumstances would impervious surfacing would be 'unavoidable'?

C6.2 Urban greening and biodiversity

C6.2.1 Major developments should meet relevant borough Urban Greening Factor target scores, or where none exist, the interim scores set out in the London Plan.

C6.2.2 Development proposals should contribute to a net gain in biodiversity.

C6.2.3 Small site minor developments should demonstrate no net loss of green cover.

No reference to relevant London Plan Policies. These are Descriptive and objective, NOT Policy specification References to relevant case studies which are examples not policies.

C6.3 Flood mitigation and sustainable drainage systems

C6.3.1 Where development is in areas at risk from flooding is permitted, homes should make space for water and aim for development to be set back from the banks of watercourses and be designed to incorporate flood resistance and resilience measures.

C6.3.2 New development should incorporate sustainable drainage systems (SuDS) in line with the drainage hierarchy.

The supporting text is descriptive analysis of the issue rather than providing specific policies on guidance of preventing flood risk and surface water run-off, including case studies which are NOT policies.

C6.4 Air Pollutant emissions and exposure

Key Standards

C6.4.1 The development of large-scale redevelopment areas (i.e. Opportunity Areas) should consider how local air quality can be improved as part of an air quality positive approach. All other development should be at least Air Quality Neutral. Air quality assessments should be submitted with all major developments.

It would be helpful if the units of air quality were specified with target limits etc as required in the assessment. This would result in applications having a set methodology of assessments which would assist evaluation by the Planning Officers.

C7 Future Proofing

C7.1 Adaptability and circularity

Key Standards

C7.1.1 Buildings should be retained and refurbished where practicable. New buildings should be designed in ways that ensure they are adaptable - including to climate change - and capable of conversion to different uses.

C7.1.2 Buildings should be designed to support the circular economy, including for disassembly, allowing for the reuse of materials and products, reducing waste and pollution.

These are NOT key standards but are descriptive **objectives**. There are no specified standards given.

C7.2 Safeguarding development potential

C7.2.1 The development of a site should not prejudice the development of adjoining land or buildings, including subsequent phases of development.

C7.3 Quality, maintenance and management

C7.3.1 Development proposals should be designed to take full account of future maintenance practicalities and likely costs.

Again, these are a list of objectives NOT policy definitions.

Module D

Housing Design Case Studies and Appendices

No Comments appropriate for **Module D** on the various case studies.

General Comments Modules A, B & C:

Our observation is that Modules A and B do not provide adequate specific guidance on policies which should have been specified in greater parameter detailed descriptions in the London Plan.

We believe Module C mainly references the original London Plan prior to the Examination in Public (EiP) and prior to the Inspector's comments and not the consolidated changes version – July 2019, subsequent to the EiP and Inspector's comments as published on the GLA website EiP Library.

It is our understanding that the Policies for enforcement should be defined in the agreed fully adopted London Plan as endorsed by the EiP and the Planning Inspectorate and any clarification or implementation guidance required of the London Plan would be contained in the Supplementary Planning Guidance (SPG).

It is also understood that the London Plan has the Full weight afforded by its formal adoption by the Planning Inspectorate, whereas the SPG does NOT have as much weight for enforcement as the fully adopted London Plan. ^[8]

Generally, the SPGs list objectives, not policy definitions, and the level of weight and enforcement has been obscured due to confusion as to where the policy definitions should reside i.e. either in the fully adopted London Plan policy document or the SPG. Therefore, it is unclear what level of weight the SPG policies have for enforcement. It is considered that specific Policies contained in the SPG should have been documented in the Full London Plan to give the appropriate weight and enforcement to the Policies.

Many of the SPG policies are a duplication of what is already documented in the London Plan and as such are superfluous and confusing, especially in Module C.

[8] <http://www.mo-ra.co/planning/planning-report-october-2019/#QuestionstoMayor>

Also, Module C has been a vehicle for expanding the objectives, not defining or clarifying the actual policy definitions or methodology for policy implementation.

The defined specification of requirements for enforcement should have the full weight of the London Plan and the SPG should only need to clarify any ambiguity of the London plan policies or define their method of implementation.

It seems that the SPG Modules were an afterthought to further explain the “Design-Led-Approach” which had not been fully thought through and therefore not fully explained in the draft London plan which has resulted in the confusing separation of policies and objectives in the SPG Modules and the London Plan.

In retrospect, the loss of the density matrix to determine residential and housing densities relative to the ‘setting’ and the available (and forecast) public transport accessibility (PTAL), which was a simple assessment and simple implementation, which failed due to lack of enforcement by LPA’s and planning officers, is a retrograde step – which could have been resolved by updating the matrix in the light of experience with a more enforceable policy statement.

LPAs are unlikely to have the resources to fully implement the ‘Design-Led-Approach’ due to very limited funds ^[9] and financial challenges resulting from the pandemic and requirements to fund other services’ requirements which could result in chaotic planning approvals due to lack of understanding or implementation of ‘Character Assessment’ of localities and the definition of the ‘Design Codes’ for localities which is a necessary and fundamental requirement to implement the ‘Design-Led-Approach’.

It is considered that the proposed “Design-led-approach” will result in virtually any proposal being approved as there is no specific policy justification which could be quoted as non-compliant to support a refusal. All assessments are very subjective which precludes a definitive justification to support a determination of non-compliance or a refusal.

Extracts from ‘Inspectors Report’ – Draft London Plan (8th October 2019) Consistency with national policy and guidance:

“Para 54 The relevant legal requirement is to “have regard to” the need to ensure consistency with national policy, and that objective is one of the four tests of soundness. Thus, whilst there is no absolute requirement for all parts of the Plan to be entirely consistent with national policy, there needs to be clear, evidence-based justification for any divergence. Furthermore, we consider that the strength of the justification should be proportionate to the degree of divergence and the significance of the policy in question.”

Infrastructure requirements:

“Para 285. “Subsequent policies relate to the site-specific context. Policy D1A seeks to ensure that density of development proposals respond to future infrastructure capacity and that it should be proportionate to a site’s accessibility and connectivity. Policy D1A part D introduces further suggested changes that set out explicitly that infrastructure capacity ultimately will limit the scale of

[9] <https://news.croydon.gov.uk/council-issues-section-114-notice-as-part-of-action-plan-to-tackle-financial-challenges/>

development where it cannot be enhanced to mitigate the impact of development. This will ensure that the density of a development cannot exceed a sustainable level, even if it is acceptable in design terms. It will also help to ensure that development accords with Good Growth.

But there is NO defined policy methodology to actually ensure “the Density of a development ‘cannot’ exceed a sustainable level”!

Irrespective of the “**Bankruptcy**” of the London Borough of Croydon and the Issue of a Section 114 Notification and the resignations of senior executives, we would bring your attention to the recent Governance Review ^[10] **recommendations:**

FINAL REPORT OF THE (London Borough of Croydon)

GOVERNANCE REVIEW PANEL - MARCH 2020

Dame Moira Gibb, Independent Chair of the Governance Review Panel

Planning Recommendations:

Planning Committee

Planning was the **committee** that Members had the greatest knowledge of (92% compared to the second choice of licensing with 56%). **Planning was also the most contentious**, attracting the most **negative comments in the Resident and Member surveys and workshops**, with concern expressed about the **transparency of decision-making and trust in the process**.

There were a number of comments and concerns that alleged that planning was **too politically influenced** and that **the input of residents did not appear to be taken into account**. Area planning committees were proposed by some Members and residents as an alternative approach.

Recommendation 9:

Ensure the decision-making structure fully supports **participation** by creating more purposeful opportunities for non-Cabinet Members and **residents** to consider and influence planned decisions **before they are taken**. Specifically, the Council should enhance the existing Leader and Cabinet model by strengthening the collective Cabinet, establishing the hybrid arrangements which introduce **Cabinet Member Advisory Committees**, appropriately revising the **scheme of delegation** and **ensuring the necessary changes are reflected within the Constitution**.

Recommendation 10:

Improve the effectiveness of Council meetings by reaching a cross-party agreement on desired changes, underpinned by consideration of the principles and proposals set out in the Governance Review report.

Recommendation 11:

Recognising **public dissatisfaction with Planning** seek to enhance understanding of the planning process by:

- Considering recommendations detailed in the PAS report and ensuring those form a key part of the Planning Committee’s journey to **improve resident experience when engaging with planning**;
- Developing more proactive, cross-party working in the area of policy discussion, setting and revision.

[10] <https://www.croydon.gov.uk/sites/default/files/Croydon%20Council%20Governance%20Review%20Enhancing%20Democracy%20March%202020%20main%20re....pdf>



Please accept this submission by the **Monks Orchard Residents' Association (MORA)** to the consultation on **'Good Quality Homes for all Londoners – Modules A, B & C consultation'** which it is understood closes on **15th January 2021**.

We would appreciate an acknowledgement and an acceptance that our representation will be considered by your 'team' and that the comments made will influence the agreed supplementary planning guidance to be adopted.

We reserve the right to make further representations or addenda to this document within the consultation period, in the event of further relevant information becoming apparent.

Kind regards



Derek C. Ritson I. Eng. M.I.E.T.
MORA Executive Committee
Planning
Email: planning@mo-ra.co



Sony Nair
Chairman MORA
Monks Orchard Residents' Association.
Email: chairman@mo-ra.co

Cc:

Sarah Jones MP	Croydon Central
Cllr. Sue Bennett	Shirley North Ward
Cllr. Richard Chatterjee	Shirley North Ward
Cllr. Gareth Streeter	Shirley North Ward

Bcc:

MORA Executive Committee
Interested Parties