



To: Case Officer – Mr Dean Gibson
Development Environment
Development Management
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Bernard Weatherill House
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**Monks Orchard Residents' Association
Planning**

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18th December 2020
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Reference	20/03288/FUL
Application Received	Fri 24 Jul 2020
Application Validated	Thu 03 Dec 2020
Address	189 Shirley Road Croydon CR0 8SA
Proposal	Alterations, use a House in Multiple Occupation with 6 Bedrooms, provision of associated off-street parking.
Status	Awaiting decision
Case Officer	Dean Gibson
Consultation Expiry Date	Wed 30 Dec 2020

Dear Mr Gibson

Please consider this letter as an **objection** to the proposed Conversion of use from **C3 dwelling to C4 HMO** with 6 Bedrooms, provision of associated off-street parking.

The applicant is required under **Article 4 Directive** to apply for Planning Permission. The following are the parameters of the proposed development.

Application Ref: 20/03288/FUL					Residential Density		
189 Shirley Road		Site Area	0.07	ha	114.29	hr/ha	
PTAL	2011	2	2031	2	Housing Density	14.29	u/ha
	Floor	Floor Area	Bed Spaces	Habitable Rooms	Residential Density	142.86	bed spaces/ha
Room 1	Ground	18.96	2	1			
Room 2	Ground	15.02	1	1			
Room 3	First	19.19	2	1			
Room 4	First	17.89	2	1			
Room 5	First	11.11	1	1			
Room 6	First	16.85	2	1			
Living Room	Ground	25.46	0	1			
Dining Room	Ground	17.39	0	1			
Kitchen	Ground	11.55	0	0			
Comm toilet	Ground	3.7	0	0			
Comm toilet	First	5.26	0	0			
Bathroom	First	9.33	0	0			
TOTALS		171.71	10	8			

The current Adopted London Plan:

There is no mention of requirements for HMO's in Chapters 1 thru 8 or in any of the annexes.

The New Draft London Plan: (Not yet adopted)

The only mention of HMOs is in Policy H1.

Policy H1-1 Ensuring the best use of stock.

CA Boroughs should take account of the role of houses in multiple occupation (HMOs) in meeting local and strategic housing needs. Where they are of a reasonable standard they should generally be protected.



4.11.2A Houses in multiple occupation (HMOs) are an important part of London’s housing offer, reducing pressure on other elements of the housing stock. Their quality can, however, **give rise to concern**. Where they are of a reasonable standard they should generally be protected and the net effects of any loss should be reflected in **Annual Monitoring Reports**. In considering proposals which might constrain this provision, including **Article 4 Directions** affecting changes between Use **Classes C3 and C4**, boroughs should take into account the **strategic as well as local importance of HMOs**.

Croydon Local Plan 2018:

No mention of HMO’s

Croydon website:

Croydon Council introduced an **Article 4 Direction on 28 January 2020 to protect family homes** (houses and flats) by requiring **planning permission** to convert these properties into small houses of multiple occupation (HMOs). The **Article 4 Direction** was confirmed to come into place on **28 January 2020**, a year after it was first made. (which is why the applicant has applied for Planning Permission) – i.e., conversion from C3 usage to C4 (HMO) is now not allowed under permitted development, planning permission is now required. The **Article 4 Direction** applies to the whole borough for change of use Class (C3) to HMO Class (C4).

Croydon Plan Review 2019 - 2039 (at 2019)	
Homes by Pace (2019 2039)	
Place	Total
Addington	280 to 350
Addiscombe	1,480 to 1,880
Broad Green & Selhurst	880 to 1,070
Coulsdon	2,050 to 2,490
Central Croydon	11,540 to 12,980
Crystal Palace & Upper Norwood	480 to 670
Kenley and Old Coulsdon	2,000 to 2,480
Norbury	540 to 670
Purley	7,260 to 9,390
Purley Way transformation area	2,900 to 4,470
Sanderstead	1,670 to 2,070
Selsdon	870 to 1,070
Shirley	360 to 460
South Croydon	890 to 1,070
South Norwood & Woodside	560 to 620
Thornton Heath	1,450 to 1,880
Waddon	500 to 610
Already under construction	5,370
Borough totals	At least 46,040 new homes across the borough

Croydon Plan Review (2019):

There is No mention of HMO’s in the **Croydon Plan Review Documents**.

The Targets for new dwellings over the period 2019 to 2039 are set out in the strategic forecast for the Croydon Local Plan Review (2019-2039) for each of the places of Croydon as shown in the table opposite.

The target for the **whole of the Shirley Place** is shown as between 360 to 460 spread over the 20 years, giving a yearly target of 18 to 23 year on year which is an average of 20.5 per year.

The **Monks Orchard Residents’ Association (MORA)** monitors only our **MORA Post Code** area for planning applications which is only a part of the **Shirley North Ward**, (after the Ward boundary changes) so is only a **small portion of the Shirley Place** as defined by the Croydon Local Plan.

There is a suggestion in the '**Weekend Financial Times**' (FT 12th/13th December) that **Brexit** may have already resulted in net immigration turning negative. This, coupled with a declining birth rate, well below replacement level would lead to a **declining population** [1] and hence a reduced need for new housing than that currently projected. *This could highlight the dangers of projecting earlier trends and the possibility that **the current targets might prove to be excessive!***

The **MORA Post Code** area application approvals for **2019** and **2020** are shown in the tables below which have provided an additional **48** and **22** = **70** addition dwellings respectively which is **well over** the **yearly quota** for the **whole** of the '**Shirley Place**'.

Location	Reference No.	Approval Date	Existing Dwellings	New Dwellings	Overall Increase
20-22 The Glade	18/05928/FUL	01/02/19	0	2	2
10-12 Woodmere Close	19/00051/FUL	27/02/19	0	1	1
9a Orchard Rise	18/06070/FUL	21/03/19	1	9	8
32 Woodmere Avenue	19/00783/FUL	20/06/19	1	7	6
18a Fairhaven Avenue	19/01761/FUL	20/06/19	1	9	8
17 Orchard Avenue	19/00131/FUL	06/11/19	1	8	7
56 Woodmere Avenue	19/01352/FUL	24/10/19	1	9	8
14-16 Woodmere Close	19/01484/FUL	23/10/19	0	1	1
37 Woodmere Avenue	19/03064/FUL	26/09/19	1	8	7
Totals			6	54	48

Location	Reference No.	Approval Date	Existing Dwellings	New Dwellings	Overall Increase
151 Wickham Road	19/04149/FUL	18/03/20	0	5	5
16-18 Ash Tree Close	19/04705/FUL	27/02/20	2	8	6
195 Shirley Road	19/06037/FUL	22/09/20	1	9	8
116 Orchard Way	20/05960/FUL	waiting	1	4	3
189 Shirley Road	20/03288/FUL	waiting	1	4	3
Totals			4	26	22

The **cumulative average estimated** over the two years is $(48 + 22)/2 = 35$ per year which is for just the **MORA post code area**, clearly **significantly exceeds** the **Strategic Target** as defined in the **Local Plan Review (2019)** of **20.5 average per year for the whole of the "Shirley Place"**.

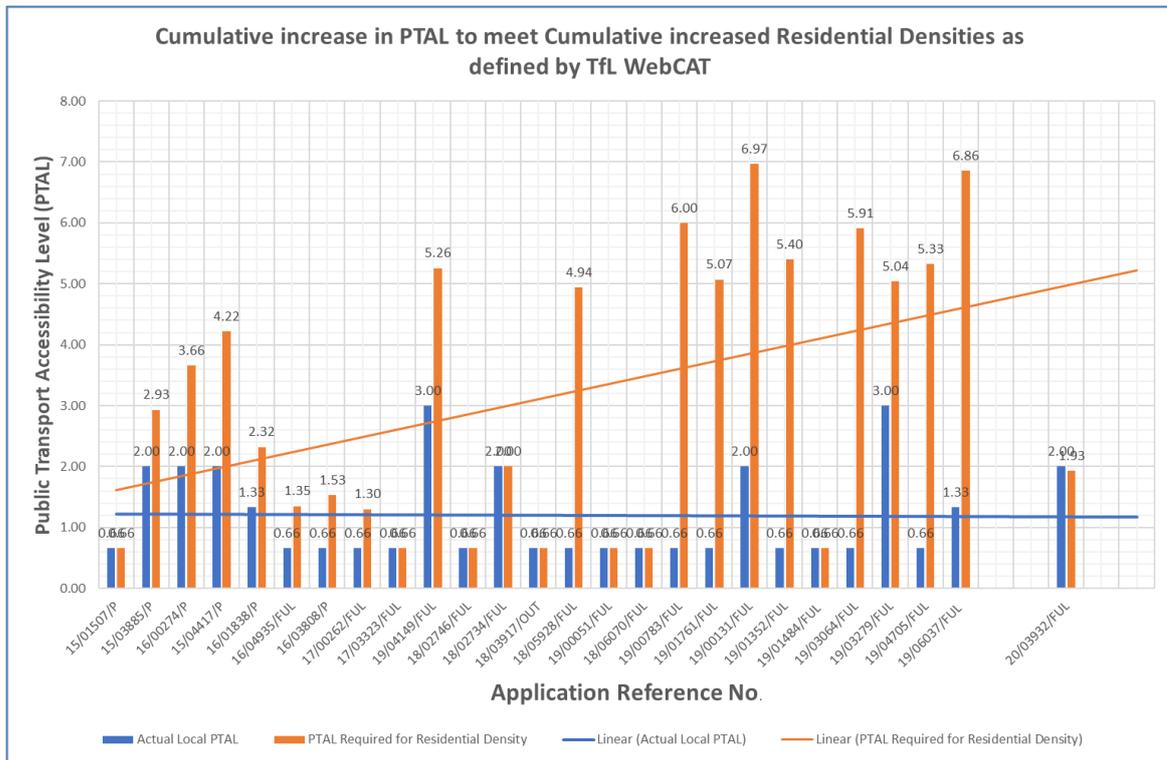
The recent **cumulative developments in the MORA post code area** have all contributed to the '**Community Infrastructure Levy**' none of which has been spent in the **MORA area** to improve the **Public Transport** or other **Public Services Infrastructure** to support these increases in local **Residential Densities**.

We therefore **object** to the proposed 'alterations of the premises for use a House in Multiple Occupation with **6 Bedrooms**, provision of associated off-street parking' on the grounds **"to protect 'family' Homes"** in this area as we are already **significantly exceeding the Strategic Target Quota year-on-year of new homes for 2019 and 2020** in the Shirley 'Place'.

[1] See data – Based on Migration Watch and Office of National Statistics



It is stressed that the MORA Post Code area is only a small part of the Shirley North Ward and does not include any part of the Shirley South Ward or the remainder of the "Shirley Place" and therefore proportionately has already had significant cumulative developments without any improved infrastructure to support the additional occupants.



This Histogram illustrates the effect of recent cumulative approvals in the MORA Post Code Area and the (unprovided) increase requirement in Public Transport Accessibility (PTAL) (trending toward 5.2 when the available PTAL is nominally 1.2), which the developments require based upon an analysis of the Transport for London WebCAT.

Croydon Local Plan Review Planning Bulletin 25th June 2020 [2]

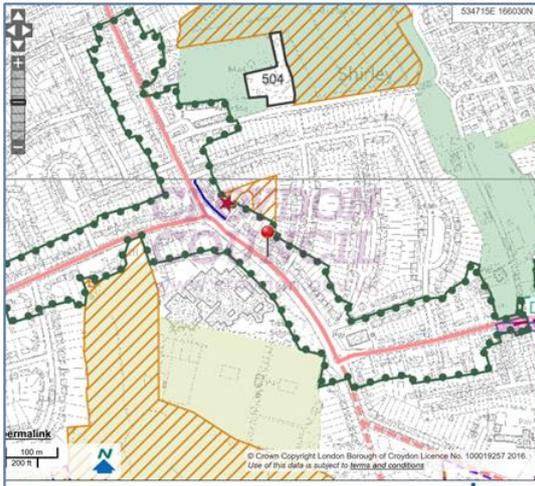
Interim Bulletin Croydon Local Plan Review Update:

“Focused Intensification Areas (FIA): Reconsidering the current **Intensification Areas** and the introduction of additional areas including the following potential options.

- **Omitting the Shirley Focused Intensification Area (FIA)** as it looks increasingly unlikely that **significant improvements to the public transport capacity in the Shirley area will be delivered over the period covered by the local plan** and hence the area only has capacity for limited future growth. The limited development potential significantly reduces the strength of the argument for major transport investment, although improvements are needed from a sustainability perspective.”

[2] See:

<https://new.croydon.gov.uk/sites/default/files/Planning/Planning%20Interim%20Bulletin%20June%2020%20FINAL.pdf>



Therefore, it is very likely that the revised Croydon Local Plan will be amended to show no area of focussed intensification in Shirley including the locality of 189 Shirley Road.

The proposals do not include any additional parking spaces for cars, and therefore any additional car ownership would require on-street parking in the vicinity. Shirley Road is a dual carriageway 'Red Route' so any overspill parking would need to be in Valley Walk. [3]

In Summary we would therefore object to the proposed on the grounds that:

- 'Alterations of the premises for use as a House in Multiple Occupation (HMO) with 6 Bedrooms, provision of associated off-street parking' would result in the loss of 'family accommodation' and therefore should be refused "to protect existing 'family' Homes' in this area;
- The MORA Post Code Area has already significantly exceeded the 'Strategic Target Quota' year-on-year of new homes for 2019 and 2020 in our locality with no additional supporting infrastructure to support this and further increases in residential density;
- It is very likely that the revised Croydon Local Plan (2021/22) will be amended to show no area of Focussed Intensification in Shirley including the locality of 189 Shirley Road.
- There is inadequate on-site car parking to prevent over-spill on-street parking in Valley Walk.

Kind regards



Derek C. Ritson I. Eng. M.I.E.T.
MORA Executive Committee – Planning
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Cc:

Sarah Jones MP

Croydon Central

Gareth Streeter

Councillor Shirley North Ward

Sue Bennett

Councillor Shirley North Ward

Richard Chatterjee

Councillor Shirley North Ward

Bcc:

MORA Executive Committee

Interested parties

[3] See: <http://www.mo-ra.co/about/area/>