

To: Richard Bruce - IT/Performance/Information
Pete Smith - Head of Development
Management
Complaints Resolution Team
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From:
**Monks Orchard Residents' Association
(Planning)**

4th August 2019

Emails:

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Complaint: CASE 5039127 - Escalation to Stage 2.

Dear Mr Smith, Mr Bruce & Complaints Resolution Team

Thank you for your response of 26th July 2019 to our Stage 1 CASE 5039127 complaint in respect of the Case Officers Report and Planning Committee's decision on 20th June 2019 of Planning Application Reference 19/00783/FUL at 32 Woodmere Avenue, Croydon CR0 7PB - for the Demolition of the existing property and the erection of a replacement detached two storey building with accommodation in the roof-space, comprising 7 self-contained flats (2 x 1 bedroom, 3 x 2 bedroom and 2 x 3 bedroom) with 5 off street car parking spaces, bike store, integrated refuse store and site access.

We appreciate your acknowledgement of our complaint but we have a number of concerns regarding your response that we need to challenge and examine in further detail to establish the validity of your assessment. After detailed analysis of your response, it seems that you have not specifically addressed the reasons of our complaint for this individual approved application (32 Woodmere Avenue) relating to the interpretation of current adopted planning policies to ensure cumulative development proposals fully meet the requirements for the localities existing and planned public transport infrastructure, but have provided more general comments on your interpretation of planning policies. As a result, our comments to your response are set out below:

Your response wording is in red text.

You state in your **findings**:

"We are obliged to determine applications in accordance with the development plan (considered as a whole) unless other material considerations indicate otherwise. The Supplementary Planning Documents, including the London Mayoral Housing SPG and the Council's own Suburban Design Guide SPD, do not enjoy the same weight as the various constituents of the development plan and are treated as other material planning considerations. As the titles suggest, they merely provide guidance in support of development plan policy and do not enjoy the weight of S70(2) of the 1990 Act."

This section S70 (2) of the Town & Country Planning Act (1990) is set out below:

Town and Country Planning Act 1990

70 Determination of applications: general considerations.

- (2) In dealing with such an application the authority shall have regard [F2to—
- (a) the provisions of the development plan, so far as material to the application,
 - (b) any local finance considerations, so far as material to the application, and
 - (c) any other material considerations.]

The interpretation of Para 70 (2) of the Act indicates general considerations as regards to sub sections (a), (b) and (c). The only interpretation of weight is given by the order of the list but NOT by any significantly identified weighting factor against each of (a), (b) and/or (c) except the order in which they are listed. Para 70 (2) does not state any significant difference between (a), (b) and/or (c). So realistically any material considerations have virtually similar weight as the development plan (a) or financial considerations (b) or any other, if they are material to a proposal (c).

If the SPG's have minimal weight the important content of SPG's should be embodied in the Local Plan. Also, why produce SPG's if they are not considered of sufficient material weight to influence decisions. The SPG guidance must have some relevance and therefore some influence on the decision-making process otherwise why produce, at great expense, a document that purports to give guidance but is ultimately ignored or has no authoritative status?

With regard your response on the **Density Matrix** you state:

“... It has been long considered that the Housing Density Matrix is no longer fit for purpose and whilst it is appreciated that it remains part of the London Plan (in its current iteration) its weight (as a material planning consideration) is relatively limited.”

If the Density Matrix is no longer “fit for purpose” and should be disregarded, we consider the lack of foresight incredibly unprofessional in not having prepared for an alternative policy strategy of which the obvious alternative is to prepare to adopt the emerging replacement London Plan Policy – to be considered as the new guidance to be followed, as otherwise there is a void in policy and no available policy to give guidance on the suitability or acceptability levels of density for any offered proposal as required by NPPF para 16 d) and NPPF para 122 “Achieving Appropriate Densities.”

We do not believe it is professional to ditch the current policy without filling the void with a considered acceptable replacement effective policy with a methodology and a detailed implementation evaluation criterion to establish appropriate Housing and Residential Densities for localities during this transitional iteration period of Development Plans as required by NPPF para 16 d) and NPPF para 122 Achieving Appropriate Densities and as advised by NPPF para 48.

The current status of the emerging Draft London Plan is the consolidated changes version– (Clean) dated July 2019 draft replacement Policy D1A Infrastructure requirements for sustainable densities and Policy D1B Optimising site capacity through the design-led approach (replacing previous draft Policy D6). These should be considered as a proposed replacement policy, including the requirement of defining a new methodology and evaluation criteria to meet the requirements of the new Policy objectives as set out in Draft **Policy D1** - London's form,

character and capacity for growth, **Policy D2** - Delivering good design, **Policy D3** - Inclusive design & **Policy D4** - Housing quality and standards. (Policy D6 has been subsumed into these policies).

Policy D1A Infrastructure requirements for sustainable densities

A The density of development proposals should:

- 1) consider, and be linked to, the provision of future planned levels of infrastructure rather than existing levels,
- 2) be proportionate to the site's connectivity and accessibility by walking, cycling, and public transport to jobs and services (including both PTAL and access to local services^{22A}).

B Where there is currently insufficient capacity of existing infrastructure to support proposed densities (including the impact of cumulative development), boroughs should work with applicants and infrastructure providers to ensure that sufficient capacity will exist at the appropriate time. This may mean, that if the development is contingent on the provision of new infrastructure, including public transport services, it will be appropriate that the development is phased accordingly. ...

C When a proposed development is acceptable in terms of use, scale and massing, given the surrounding built form, uses and character, but it exceeds the capacity identified in a site allocation or the site is not allocated, and the borough considers the planned infrastructure capacity will be exceeded, additional infrastructure proportionate to the development should be delivered through the development. This will be identified through an infrastructure assessment during the planning application process, which will have regard to the local infrastructure delivery plan or programme, and the CIL contribution that the development will make. Where additional required infrastructure cannot be delivered, the scale of the development should be reconsidered to reflect the capacity of current or future planned supporting infrastructure.

The emerging Draft London Plan – consolidated changes version – July 2019 states at paras 3.2.7.& 3.2.8:

3.2.7 The scrutiny of a proposed development's design should cover its layout, scale, height, density, land uses, materials, architectural treatment, detailing and landscaping. The design and access statement should explain the approach taken to these design issues (see also requirements of Policy D3 Inclusive design).

3.2.8 For residential development it is particularly important to scrutinise the qualitative aspects of the development design described in Policy D4 Housing quality and standards. The higher the density of a development the greater this scrutiny should be of the proposed built form, massing, site layout, external spaces, internal design and ongoing management. This is important because these elements of the development come under more pressure as the density increases. The housing minimum space standards set out in Policy D4 Housing quality and standards help ensure that as densities increase, quality of internal residential units is maintained.

If Croydon Planning Authority had decided to dispense with the current London Plan Policy 3.4 - Optimising Housing potential prematurely, it would be extremely helpful if Development Management or the Spatial Planning Team had foreseen this emerging situation and developed a strategy to fill this void in policy definition and prepared to implement the Draft New London Plan Policy in conjunction with other Policies and evolved a methodology and evaluation criteria in readiness to change from Policy 3.4 to the new London Plan Policies in advance of its probable adoption as required of the new NPPF para 16 d) and Para 122 - Achieving Appropriate Densities.

The current policy is to accept a situation where there are actually NO guidance policies whatsoever for appropriate densities for any designated locality and therefore there is no policy to “manage development proposals”; so realistically, what is your responsibility?

You further state:

“As you will be aware, the supporting text advises that a consideration of housing density is only the start of planning housing development; not the end and it would be unacceptable to apply the density matrix mechanistically.”

The Density Matrix is current policy and the *“unacceptability to apply the density matrix mechanistically”*, is the often-repeated reasoning for totally disregarding the policy which is a fundamental reason why the policy has failed. If the Density Matrix broad ranges of Density relating to the broad ranges of PTAL are not observed, the whole significance of the Density Matrix is undermined and then falls into disrepute – not that the Policy was flawed but because the policy was disregarded and planning officers failed to regulate densities accordingly. The reason being argued that the Density Matrix is invalid is NOT that it isn't appropriate, it is because planning approvals have not observed the limitation of the matrix and therefore it is assumed that the Matrix is ineffectual – but this is because planning officers were ignoring the policy – not that the policy itself was flawed as evidence from my Question No: 2019/8973 to the mayor who gave a response: *“... Fifteen years of evidence indicates that the density matrix has provided a poor benchmark or indicator of appropriate densities. Over that period, only 35 per cent of development has been within the density matrix range, whereas 50 per cent of development has exceeded the matrix range for its location and 25 per cent has been double the top end of the range.”* These statistics show that Planning Officers took the view that they considered proposals outside the recommended ranges were acceptable and were therefore ignoring the policy – NOT that the policy was actually flawed or perhaps needed amending. Very unprofessional!

The Matrix, with its broad density ranges and broad PTAL ranges are the only available mechanism for effectively managing residential development population increases within acceptable public transport accessibility appropriate for the localities PTAL ratings.

Nevertheless, this current policy – The London Plan Policy 3.4 Table 3.2 is the only guidance available at present and without guidance it appears to be a race to the bottom regarding analysis of appropriate densities within available PTAL ratings. Developers are taking advantage of a void in Policy and putting forward proposals that excessively exceed current adopted policy in the full knowledge that a replacement emerging policy has not yet been adopted.

The result of such unplanned excessive densities is overpopulation of localities, inadequate supporting infrastructure, traffic congestion and increased on-street parking stress at these uncontrolled excessive density specific localities. It was our understanding that the council department required to manage developments was ... **“Development Management”**. But presently there is **NO actual management of developments** in Shirley or for that matter – other areas of Croydon.

Below is the evidence of recent uncontrolled excessive densities for required local PTAL:

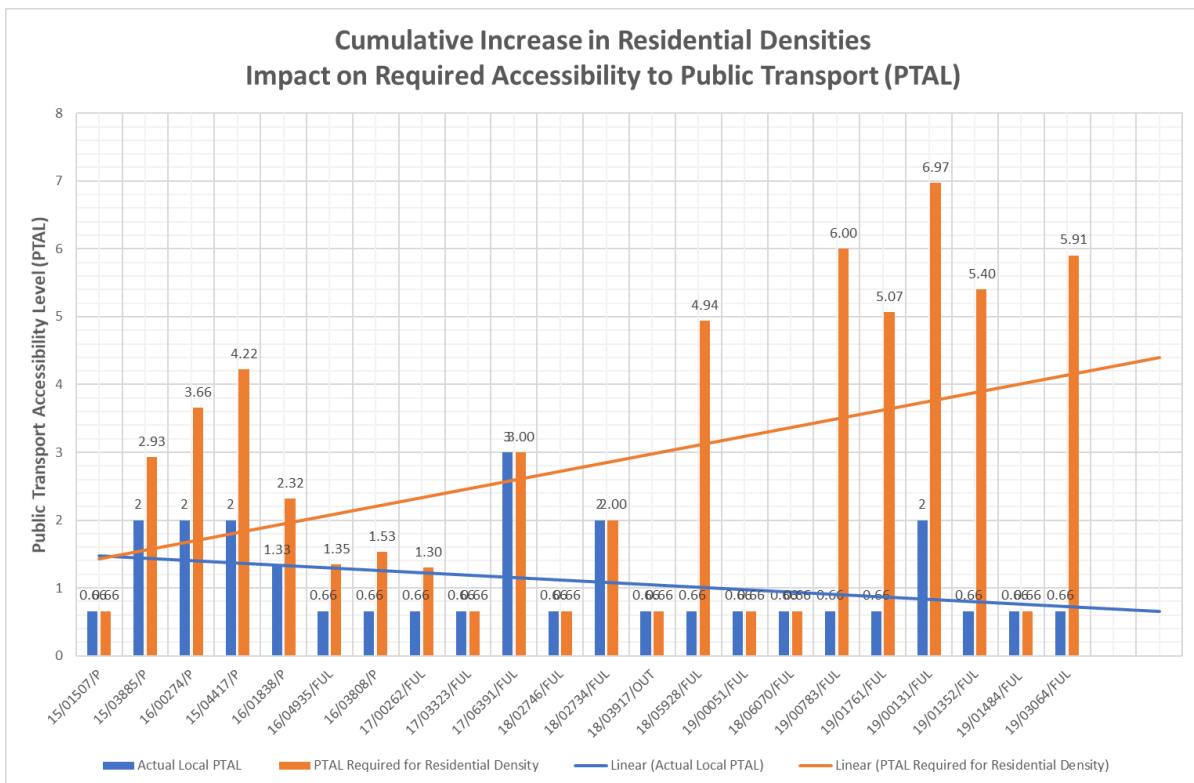


Illustration of excessive PTAL Requirement above the Local available PTAL due to Increased Densities of Applications in the MORA Post Code Area showing the ongoing PTAL linear trend requirement.

Croydon Local Plan Paras 4.27 & 6.37 state:

4.27 The proportion of homes to have three bedrooms will vary across the borough based on existing character and public transport accessibility and is based upon the **London Plan’s density matrix²¹**. The approach recognises that more central locations with higher density development will not be so compatible for accommodating larger units. The Council’s housing allocations scheme gives more priority to households that are working and the use of local letting schemes and the level of housing need will help to balance any issues arising regarding the viability of providing family homes.

6.37 The Croydon Local Plan provides policy on urban design, local character and public realm. However, in line with the National Planning Policy Framework, **there is a need to provide detailed guidance on scale, density massing, height, landscape, layout, materials and access**. This will provide greater clarity for applicants.

However, the Croydon Local Plan **DOES NOT** provide **ANY** detailed guidance on density, Massing or Layout which is in total disregard of **National Policy** defined in **NPPF para 16 d) and NPPF para 122 which state:**

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;

and;

Achieving appropriate densities

122. Planning policies and decisions should support development that makes efficient use of land, taking into account:

- c) **the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;**
d) the desirability of maintaining an **area's prevailing character and setting** (including residential gardens), or of promoting regeneration and change; ...

You further comment:

“Whilst I am always impressed with the extent to which MORA analyse the various planning issues, I do feel that your approach (in relation to the density matrix) is too mechanistic; you will always treat failure to comply as a reason to refuse planning permission (rather than using the matrix as a starting point when assessing the various issues).”

I am truly grateful for your recognition of the extent to which I, on behalf of MORA, analyse the various planning issues and try my best both to represent local residents and to analyse in detail the proposals in our locality against the adopted planning policies. As a qualified engineer, I have spent a lifetime on the design, development and drafting of Technical Specifications, Tender Documents and subsequent Tender evaluations and subsequent Project Management, with a detailed understanding of the importance of the necessary requirements to get the design specification correct in every specific detail at the outset, as not to do so has possible devastating consequences subsequently after tender evaluation and project implementation and completion. For a planning professional, the vague and subjective Croydon Plan Policies are an anathema to my experience.

However, these Policies are the only currently available guidance we have to ensure developments have appropriate accommodation standards and are supported by the available and projected public transport infrastructure or level of services offered to the local population even though these policies are rather vague and subjective to be fully effective.

You further comment:

“I think it is also worth bearing in mind the interplay between the various development plan documents – especially has they tend to be adopted at different times – with the weight afforded to policies changing over time. As I have highlighted on a number of occasions, the delivery of



additional housing is now of primary importance and we are firmly of the view that the density of such housing is of lesser significance (albeit within reason)."

The various development plan documents and their iterations are all evolving at different times and by different authorities and therefore it should be feasible to have some level of co-ordination and adaption between the progress of iterations and emerging policy definitions. Have you had any representation at the London Plan EiP?

It is extremely unprofessional to allow Policy vacuums between iterations of Local and National Development Plans which allows uncontrolled development proposals to be approved only because there is no current enforceable agreed adopted policy to refuse an inappropriate proposal which could subsequently withstand a challenge – as the policy is devoid of reason for enforcement.

We all accept that delivery of more homes is necessary – however it is abundantly clear that this administration need to gain the confidence and support of not only MORA residents – but all Croydon Residents to fulfil the targets and provide the much-need affordable homes. To gain that confidence and support, there needs to be a recognition that development proposals MUST meet the policy definitions and those Policies MUST be reasonable and acceptable to the local population. Failure to do so generates extreme hostility and lack of public confidence in the Planning process, within the community. There seems to be little effort to engage with the community to assist this endeavour. The attitude of the Planning Committee is very abrasive and confrontational.

You state:

"The London Mayor was satisfied that the Croydon Local Plan 2018, with its ambitious housing targets and 10,000 new units being delivered through the development of windfall sites, was in conformity with the London Plan (even with the London Density Matrix in place) and the appointed Planning Inspector found that the Croydon Local Plan passed the various "tests of soundness".

The London Mayor is understandably very satisfied with the London Borough of Croydon who have given unqualified compliance without challenge to the very high volume of housing targets compared to other outer London Boroughs as the examples below illustrate:

Your point about Targets set by the Mayor of London has been raised previously in MORA submissions to the Mayor's Examination in Public (EiP) of the new draft London Plan and in representations that targets have been set based upon the availability of existing public transport infrastructure and not on ratios of area or current populations.

For example, Bromley has nearly three times the area of Croydon and >14% less population but has an approximate 52% lower target than Croydon which seems a bit imbalanced. (See Table 4.1 – Draft London Plan). We understand the reason for this imbalance is that Croydon has much better transport links than other London boroughs - but if that is the reason, this imbalance will never be rectified until other Outer London boroughs' transport links are improved! That should be the emphasis and reflected within the targets set as the current rate of uncontrolled intensification of developments will destroy the pleasant local environment of suburban Croydon for future generations.

Extract Table 4.1: 10-year targets for net housing completions (2019/20 -2028/29)

Planning Authority	Ten-year Housing Target	Annualised average
Bromley	14,240	1,424
Sutton	9,390	939
Croydon	29,490	2,949

Planning Authority	Area in sq. km.	Population (2017)
Bromley	150.15	329,391
Sutton	43.85	203,243
Croydon	86.52	384,837

Local Authority	LA Comparison	Area (sq.km.)	Population
Croydon	Bromley	+73.544%	-14.408%
Croydon	Sutton	-49.318%	-47.187%

You continue:

“Bearing in mind that most suburban areas of Croydon are characterised by low PTALs and exhibit lower density characteristics, it is inevitable that densities will need to increase to ensure that we deliver the housing expected on windfall sites. The London Mayor now understands and has adopted this approach (as a means to deliver more housing in the suburbs) which is one of the main reasons why the current New London Plan seeks to remove the Housing Density Matrix.”

We understand Densities need to increase but as a professional planning officer, your objective should be to define *by how much this should be*. Without guidance it is, and has been, found to be a race to the bottom for the highest densities and maximum profit that developers can get away with – they are NEVER challenged by the professionals because there is no policy guidance which would support a refusal if challenged by a developer (by appeal) as there are no actual policy grounds to sustain a refusal decision. This is an impossible situation for professional planning officers as they do not have adequate policies to support any suggestion of a refusal of an inappropriate proposal.

For example, Table 6.4 of the Croydon Local Plan defines designations of growth as:

Table 6.4 Accommodating growth and improving Croydon.

Method of accommodating growth and improving Croydon
Evolution without significant change of area’s character
Guided intensification associated with enhancement of area’s local
Focussed intensification associated with change of area’s local
Redevelopment

However, these Table 6.4 designations of “accommodating growth” are not defined with any parameters, regarding Scale, Massing and Density and there is no delineating guidance between designations; therefore, the whole borough is considered suitable for maximum densities irrespective of local character or available supporting infrastructure or the appropriate designation as given in Table 6.4. SPD2 also does not indicate any limits to increased densities so in actual fact there is no policy mechanism to limit densities across the whole Borough – as stated previously it’s a race to the bottom.

You state:

“When determining planning applications, it is important that the decision-taker considers the development plan as a whole, recognising that some policy considerations might not totally align with other policy issues and approaches.”

The Croydon Local Plan at Policy DM10.1 states:

10.1 Proposals should be of high quality and, whilst seeking to achieve a minimum height of 3 storeys, should respect:

- a. The development pattern, layout and siting;
- b. **The scale, height, massing, and density;**
- c. The appearance, existing materials and built and natural features of the surrounding area; the Place of Croydon in which it is located.

But as stated earlier the Croydon Local Plan DOES NOT give any guidance for these parameters of **Scale, Massing or Density** and thus does not reflect the required guidance of the new [NPPF para 16 d\)](#) or new [NPPF para 122](#).

You also comment further:

“It is for this reason why some decisions are taken in the balance, with greater weight being given to certain consideration over others. In most cases we feel that the need to deliver more housing should reasonably counter density considerations (unless serious harm is caused by the scale of development for whatever reason). Of the schemes determined in Shirley, we are satisfied that we have struck the appropriate balance and are satisfied with the scale and effects of the flatted schemes granted to date. I appreciate that this might run counter to your own position (and those of Shirley residents) but I stand by our recommendations to grant planning permission and the eventual decision (invariably taken by the Council’s Planning Committee).”

As a professional Planner, on what grounds or indices are you “satisfied that you have struck the appropriate balance” and that you are satisfied with the scale and effects of these recent flatted schemes thus far granted approval if there is no policy guidance to which you can quote?

Planning permission has been granted to Back-Land flatted schemes without adequate access for emergency service vehicles. This is a dangerous precedent which has been set, and has implications for the safety of future occupants of those developments for the lifetime of the development. I do NOT feel that this is satisfactory for future Shirley residents, and its effects could potentially be devastating.

The Planning Committee has judged the acceptability of proposals on the grounds that – *“it is near a school; it looks reasonable and homes are much needed so – recommend approval”*. But none of those statements relate to policy requirements.

When Residential and Housing Densities are not used as parameters to determine impact on the local area, when the published guidance of policies are not used as guidance, and when Planning Policies are not being adhered to, then for what purpose is the Planning Department? What judgements are made that would determine an application not being approved? Our objections are based upon available planning policies which are weakened at every iteration of the Local Plan. Approvals are given despite guidance and planning policy.

You continue:

“Supplementary Planning Documents

“As the title suggests, these documents supplement the development plan and do not carry the same weight as development plan policy. I think it is also relevant that Croydon’s Suburban Design Guide was produced following on from the adoption of the Croydon Local Plan (2018) and arguably, when considering increase intensity of development set against density issues, should take precedence over the various exceptions outlined in paragraphs 1.3.50-1.3.53 of the London Mayoral Housing SPG; especially as the Croydon Local Plan seeks to achieve a minimum height of 3 storeys and the Suburban Design Guide provides examples of how sites might be suitably intensified .”

The Supplementary Design Guide SPD2 provides absolutely NO guidance on density for the various “Places” or local designations as listed in the Croydon Plan. There are very minimal design parameters specified or guidance of acceptable limits. It is really a missed opportunity to actually provide real guidance of what would be acceptable and what would be unacceptable at various designated areas or localities. Surely these are the fundamentals for the Planning profession.

Responding to Your Specific Points

“I am satisfied that we properly considered the implications of the density matrix and took it suitably into account. We outlined why we felt that the density of development was acceptable and reviewed the various effects and impacts. I disagree with your position that these schemes are not in keeping with the general character and appearance of the area. Your focus on the exceptions (contained on the Mayors Housing SPG) have limited significance (in our view) in view of the more recent adoption of the Suburban Design Guide.”

It is clear that you and the case officer have NOT considered the implications of the Density Matrix for this proposed development as the case officer has made it very clear that the broad ranges allow it to be disregarded but has not actually provided any substantial justification for disregarding the Policy 3.4. Significantly, although disregarding the current Policy 3.4, the case officer has not even considered the emerging replacement policies of the Draft London Plan as a replacement Policy or prepared any evaluation methodology or criteria to assess the proposal against the emerging Policy.

In relation to the current adopted Mayor’s Housing Design guide there are lists of reasons for increased densities at paras 1.3.50 to 1.3.55 and none have been quoted in the case officers report.

Para 1.3.52 states: *“where these considerations are satisfactorily addressed, the London Plan provides sufficient flexibility for such higher density schemes to be supported. It should, however, be recognised that this is not an exhaustive list and other more local or site-specific factors may also be given*

appropriate weight, taking into account the particular characteristics of a proposed development and its impact on the surrounding area.”

So, what site specific factors are so significant to have given sufficient weight for this proposal at the lowest PTAL of 1a at recommended Residential Density in the broad range of 150 to 200hr/ha to allow a Density of **350hr/ha** which requires a PTAL of **6** – THE HIGHEST POSSIBLE level? OR a Housing Density at PTAL 1a with recommended range of 50 to 75u/ha to be actually **116.67u/ha** requiring a PTAL of **5.56** – in the highest range 4 to 6? (See Table 3.2 Below)

Table 3.2 Sustainable residential quality (SRQ) density matrix (habitable rooms and dwellings per hectare)			
Setting	Public Transport Accessibility Level (PTAL)	Public Transport Accessibility Level (PTAL)	Public Transport Accessibility Level (PTAL)
	0 to 1 <i>(1a= 0.66)</i>	2 to 3	4 to 6 <i>(HD 5.56) (RD 6)</i>
Suburban	150–200 hr/ha <i>(=183 hr/ha)</i>	150–250 hr/ha	200–350 hr/ha <i>(350 hr/ha)</i>
3.8–4.6 hr/unit	35–55 u/ha	35–65 u/ha	45–90 u/ha
3.1–3.7 hr/unit	40–65 u/ha	40–80 u/ha	55–115 u/ha
2.7–3.0 hr/unit <i>(3hr/unit)</i>	50–75 u/ha <i>(=66.5 u/ha)</i>	50–95 u/ha	<i>(116.67 u/ha)</i> 70–130 u/ha

Table 3.2 Residential & Housing Densities for 32 Woodmere Avenue – White Text recommended, Blue Text actual required for the locality and PTAL, Red Text for proposal.

If additional reasons are not available, where in the Suburban Residential Development SPD2 Design Guide does it provide any “guidance” on appropriate Densities for any locality at any PTAL?

You further state:

“I appreciate that we have received and determined a number of planning applications to redevelop single house plots to provide alternative flatted accommodation. We do take account of cumulative impact and consider the effect of increased on street car parking (set against high safety considerations). Social infrastructure can be enhanced through the use of Community Infrastructure Levy.”

How, precisely, do you take account of cumulative impact?

There are no publicly available stated methodologies of recording increase in densities or population increases relating to planning approvals or in relation to available public transport accessibility or the cumulative impact on other services.

“I note your comments about increased pressure on health services and the recent closure of surgeries. The Council works alongside the health authority to identify infrastructure needs and it is for the health authority to plan for population growth and associated pressures on patient numbers and manage accordingly for eventual delivery, utilising any monies that might be available through use of CIL. Whilst this should run in tandem with the intensification agenda, the local planning authority would have no basis to refuse planning permission and prevent developers from delivering new housing whilst others seek to deal with and resolve their infrastructure pressures.”

We have not seen any evidence that the council works alongside the Local Health Authority to identify infrastructure needs. The two GP surgeries in the Shirley area which have been closed have not been replaced by any alternative, just merged with other practices which has put added pressure on existing surgeries. Particularly the closed surgery of the Bywood Road area, which had a catchment covering the main areas of recent developments.

We have not seen any visible benefits of the Community Infrastructure Levy (CIL) in Shirley from ANY of the recent developments in the Shirley Wards. It would be interesting to hear which areas of Croydon have benefited from the CIL contributions, funded from Developments in Shirley North Ward?

“I appreciate that this response is unlikely to satisfy you and your residents and we may well have to agree to disagree. Unlike other neighbouring London Boroughs, this Council has adopted a progressive agenda to deliver on its housing targets and take difficult decisions. Most of the sites in Shirley are brownfield in character (having been previously developed) and their redevelopment and intensification is generally supported by planning policy across all tiers of government.”

The decisions that the Council Planning Department have taken seem to be far from difficult. Without following policy or guidance mechanistically, it is simple to make a planning decision. If planning decisions are to be made on such a subjective basis then it nullifies the requirements of a Committee of “professionals” to make recommendations or determinations.

What you seem to be inferring is that any application, irrespective of suitability, is acceptable and you are reducing the need for professionalism of planning officers to determine acceptability or otherwise as the policies are becoming so vague and subjective, the analysis of adequacy of development proposals do not now require professional planners to make those determinations.

Most of the sites in Shirley are NOT in intensification zones, and were once family homes. They are now becoming large flatted developments with very limited communal and private open space, with limited transport links, oversubscribed local schools and fewer GP surgeries. Some back-land developments do not even have adequate Emergency Vehicular access. Planning Policy does NOT support these developments.

It is not for the satisfaction of myself or the residents we represent, that we object to these developments. It is for the lack of adherence to Planning Policy and guidance that the Monks Orchard Residents' Association objects. Planning Policy and guidance adherence should be something that the Planning Department strives to achieve. On this; myself, the residents we represent and the Planning Department should all be in general agreement.

That we are not all in agreement on this issue is a sad indictment of the professionalism of the Council's Planning Department.

This response has been agreed and authorised by the Full MORA Executive Committee.

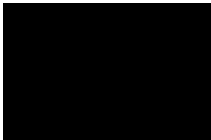
Kind Regards



Derek (MORA Planning Adviser).

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

MORA Planning



Sony Nair

Chairman, Monks Orchard Residents' Association.

On behalf of the Executive Committee, MORA members and local residents.

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



Cc:

Sarah Jones MP	Croydon Central (Shadow Housing Minister)
Mr Pete Smith	Head of Development Management
Steve O'Connell	GLA Member (Croydon & Sutton)
Cllr. Sue Bennett	Shirley North Councillor
Cllr. Richard Chatterjee	Shirley North Councillor
Cllr. Gareth Streeter	Shirley North Councillor
Cllr. Jason Cummings	Shirley South Councillor
Cllr. Roche Scott	Shirley South Councillor

Bcc:

MORA Executive Committee	
Trevor Ashby	Chair - Shirley Planning Forum (SPF)
Interested Parties	