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Monks Orchard Residents' Association
Planning

Ms. Milena Opolska - Case Officer
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4th February 2022

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Town and Country Planning Act 1990
Planning Appeal (W)
Location: 176-178 Orchard Way, Croydon CR0 7NN
Application Ref: 21/01635/FUL
Appeal Reference: APP/L5240/W/21/3281590
Start Date: 24 Jan 2022
Consultation Close: 28 Feb 2022

Dear Ms Opolska

Please accept this formal letter supporting the LPA refusal of the proposed development **Ref: 21/01635/FUL** as our written Statement for request for Dismissal of the **Appeal Ref: APP/L5240/W/21/3281590** against the LPA's refusal for: *Demolition of existing dwellings, erection of three pairs of two storey 3-bed semi-detached dwellings with roof accommodation and one pair of two storey 2-bed semi-detached dwellings with car parking, formation of accesses onto Sloane Walk together with a new pavement, and provision of cycle, refuse and recycling stores and soft landscaping.*

Parameters of the Proposal:

Semi-Detatched Dwellings		8		Residential Density		271.43	hr/ha	PTAL		2011	2031	Floor Area Ratio
	Site Area *	1400.00	sq.m.	Residential Density		242.86	bs/ha	176 Orchard Way		PTAL	Zero	
	Site Area *	0.1400	ha	Housing Density		57.14	unit/ha	178 Orchard Way		PTAL	1b	1.52
New	Floor	Bedrooms	Bed-Spaces (Persons)	Habitable Rooms	GIA Offered (sq.m.)	GIA Required	Built-In Storage offered	Built-In Storage Required	Private Garden Space offered	Car Parking Space	Electric Charging Facility	Cycle Store
Unit 1	Ground	0	0	2	129.02	99	2.5	Not Stated	53.64	1	Not Stated	Shed
	First	2	3	2								
	Second	1	2	1								
Unit 2	Ground	0	0	2	127.38	99	2.5	Not Stated	63.56	1	Not Stated	Shed
	First	2	3	2								
	Second	1	2	1								
Unit 3	Ground	0	0	2	127.38	99	2.5	Not Stated	63.34	1	Not Stated	Shed
	First	2	3	2								
	Second	1	2	1								
Unit 4	Ground	0	0	2	127.38	99	2.5	Not Stated	71.8	1	Not Stated	Shed
	First	2	3	2								
	Second	1	2	1								
Unit 5	Ground	0	0	2	118.72	90	2.5	Not Stated	59.21	1	Not Stated	Shed
	First	2	2	2								
	Second	1	2	1								
Unit 6	Ground	0	0	2	118.72	90	2.5	Not Stated	91.95	1	Not Stated	Single Cycle Stand
	First	2	2	2								
	Second	1	2	1								
Unit 7	Ground	0	0	2	86.14	70	2	Not Stated	75.67	1	Not Stated	Single Cycle Stand
	First	2	3	2								
Unit 8	Ground	0	0	2	86.14	70	2	Not Stated	128.54	1	Not Stated	Single Cycle Stand
	First	2	3	2								
Totals		22	34	38	920.88	716	19	0	607.71	8	0	0

1 Appellant's Grounds of Appeal Section 6 para 6.1, 6.2 & 6.10.

1.1 ***6.1*** *… **Paragraph 130 states that residential densities should be optimised and a significant uplift in density should be sought unless it can be shown to be clearly inappropriate.***

1.2 **6.2 London Plan Policy D3 requires new development to make best use of land** following a design-led approach that optimises **site capacity**. Boroughs should encourage development on windfall sites.

1.3 **6.10 London Plan Policy D3** requires new development to make best use of land following a design-led approach that **optimises site capacity.** The policy no longer seeks to use the **Density Matrix** employed in previous Plan iterations, preferring to focus on design outcomes to **facilitate intensification.** The appeal proposal is consistent with those aims and objectives.

2 MORA observations and comments on Appellant's Grounds Paras 6.1. 6.2 & 6.10

Reason 1 Evidence:

2.1 The new **London Plan Policy H2** at **para 4.2.4** states:

> ***4.2.4 Incremental intensification*** *of existing residential areas within **PTALs 3-6** or within **800m** distance of a station[1] or town centre boundary[2] is expected to play an important role in contributing towards the housing targets for small sites set out in Table 4.2.*

2.2 The implication of **Para 4.2.4** is that ***"Incremental Intensification"*** is ***"inappropriate"*** at **PTAL levels** below **3** and at distances greater than **800m** from either **train/tram Stations** or **District Centres**.

2.2.1 The locality of the proposed development is **Outer-Suburban** or **Suburban**[3], and **176 Orchard Way** is at **PTAL Zero** and **178 Orchard Way** is at **PTAL 1b** (TfL WebCAT). Thus, below **PTAL 3**. The location is also greater than **800m** from any **tram** or **train Station**, the nearest of which is **Eden Park Rail Station** (greater than 800m from the site) and greater than 800m from a District Centre. The Shirley Centre is defined as a

[1] Tube, rail, DLR or tram station
[2] District, major, metropolitan and international town centres

[3] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1009793/NMDC_Part_1_The_Coding_Process.pdf (see Part 1 Coding Process, Section 2B, Page 14).

Local Centre in the Croydon Local Plan which is NOT a District Centre. See Google Image below.

Reason 1 Summary:

2.2.2 Therefore, irrespective of NPPF Paragraph 130 *which states that residential densities should be optimised and a significant uplift in density should be sought unless it can be shown to be clearly inappropriate, we* contend that the locality at PTAL Zero and 1b, and greater than 800m from a Tram/Train Station or District Centre confirms it would be inappropriate for *'incremental intensification'* or a significant uplift in Density as the London Plan Policies H2 para 4.2.4 clearly provide evidence that it would be inappropriate to do so.

Reason 2 Evidence:

2.3 **Moderate and Gentle Intensification**

2.3.1 The Croydon Local Plan review was due for consultation June/July 2021 but delayed due to Covid. Now aimed for adoption 2022.

2.3.2 NPPF Para 49 An "application is premature are unlikely to justify a refusal of planning permission **other than in the limited circumstances where both** the development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an **emerging plan**; and the **emerging plan is at an advanced stage** but is not yet formally part of the development plan for the area.

Reason 2 Summary:

2.3.3 Therefore, irrespective of NPPF Paragraph 130 which states that *"residential densities should be optimised and a significant uplift in density should be sought **unless it can be shown to be clearly inappropriate**."*

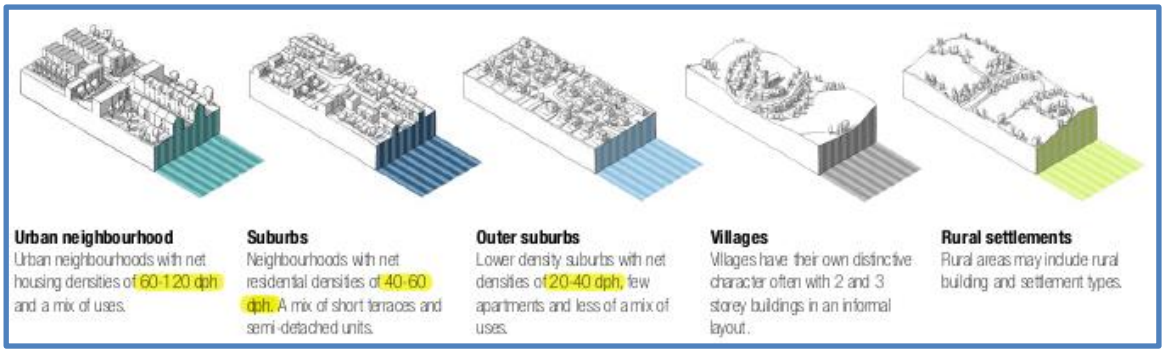
2.3.4 The Revised Croydon Local Plan is at an advance stage and will redefine areas appropriate for Intensification, which excludes Shirley from *Focussed Intensification* and acknowledging that there is no prospect of improvements to local supporting infrastructure, public transport etc., in the foreseeable future which provides clear evidence that it would be inappropriate for uplift in Density for the Shirley North Ward. Also, as the proposed development is <PTAL3 and >800m from a Tram/Train Station or District Centre, is inappropriate for incremental intensification.

Reason 3 Evidence:

2.4 London Plan Policies & NPPF Nation Model Design Code (NMDC)[4]:

2.4.1 The New **London Plan Policies D1 through D4 and H2** have specified a ***"Design-Led-Approach"*** to ensure development proposals are within the available **Site Capacity** and have adequate supporting infrastructure for Sustainable Developments. The Communities & Local Government have published **National Model Design Codes** and guidance. These establish the recommended parameters for Outer Suburban (Outer London Suburban) and Suburban Housing Density ranges and typologies.

2.4.2 **National Model Design Codes** (The Coding Process, Part 2B, Coding Plan Page 14)



2.4.3 **Design Code Settings and Densities (Shirley North Ward).**

2.4.4 The Area of **Shirley North Ward** is **≈327.9ha.** The population of Shirley North Ward at 2021 is estimated (GLA data) at **15666** persons. With an average occupancy of **2.39** persons per dwelling (NOS Data), this gives an average of **6554.81** dwellings in an area of **327.9ha** which equate to a housing density for the Ward at **19.99units/ha (≈20Units/ha)**. This clearly puts the locality in the low end of the **National Model Design Code (NMDC) Outer (London) Suburban Design Code Density category of between 20 and 40 units per hectare**

Population Density - Shirley North Ward		
Shirley North Ward (2019) GLA data	15058	Persons
Area of Shirley North Ward (Km^2)	3.279	km^2
Area of Shirley North Ward (hectares)	327.90	ha
Population Density of Shirley North Ward (per km^2)	4592.25	per km^2
Population Density of Shirley North Ward (per hectare)	45.92	per ha
Annual Population change since 2019	0.02	%
Population of Shirley North Ward 2020	15359.16	
Population of Shirley North Ward 2021	15666.34	
Population of Shirley North Ward (per Km^2)	4777.78	per km^2
Population of Shirley North Ward (per ha)	47.78	per ha
Area of Shirley North Ward	327.90	ha
Average Population Density	**47.78**	**(Persons per ha)**

2.4.5 For the smaller **MORA** Area[5] measured on Google Earth to be **≈178.26ha** we have **3884 Dwellings** which equates to **21.79 units/ha** which again is well within the **20 to 40 units/ha** for an **Outer (London) Suburban Design Code Density**.

MORA Area	178.26	ha
MORA Members (Households)[1]	3884	Dwellings
Housing Density MORA Area (Units/ha)	21.79	units/ha
Residential Density MORA Area (bs/ha)	52.07	persons/ha
Note 1: Every Household in the MORA Area is a MORA Member		
Average Persons per household (UK) (ONS Data)	2.39	per unit
Shirley North Population Density (GLA Data)	56.83	persons/ha
Housing Density Shirley North Ward (units/ha)	23.78	units/ha

[4] https://www.gov.uk/government/publications/national-model-design-code
[5] http://www.mo-ra.co/about/area/

We have investigated the parameters for our Shirley North Ward as listed in the following Table:

Design Code Summaries (Housing Densities Units/ha)						
Location	Area (ha)	Population	Dwellings (Units)	Residential Density (bs/ha)	Housing Density (Units/ha)	"Setting" for Design Code Density
Shirley North Ward	327.90	15666	6555	47.78	19.99	<Outer Suburban
Shirley South Ward	387.30	14147	5919	36.53	15.28	<Outer Suburban
All Shirley	715.20	29814	12474	41.69	17.44	<Outer Suburban
MORA Area	178.26	9283	3884	52.07	21.79	Outer Suburban
Post Code CR0 8S(*)	16.95	627	237	36.99	13.98	<Outer Suburban
Post Code CR0 8T(*))	11.82	644	246	54.48	20.81	Outer Suburban
Post Code CR0 7PL	1.73	47	19	27.17	10.98	<Outer Suburban
Post Code CR0 7QD	1.51	68	28	45.03	18.54	<Outer Suburban
Average	205.08	8787	3670	42.72	17.35	<Outer Suburban

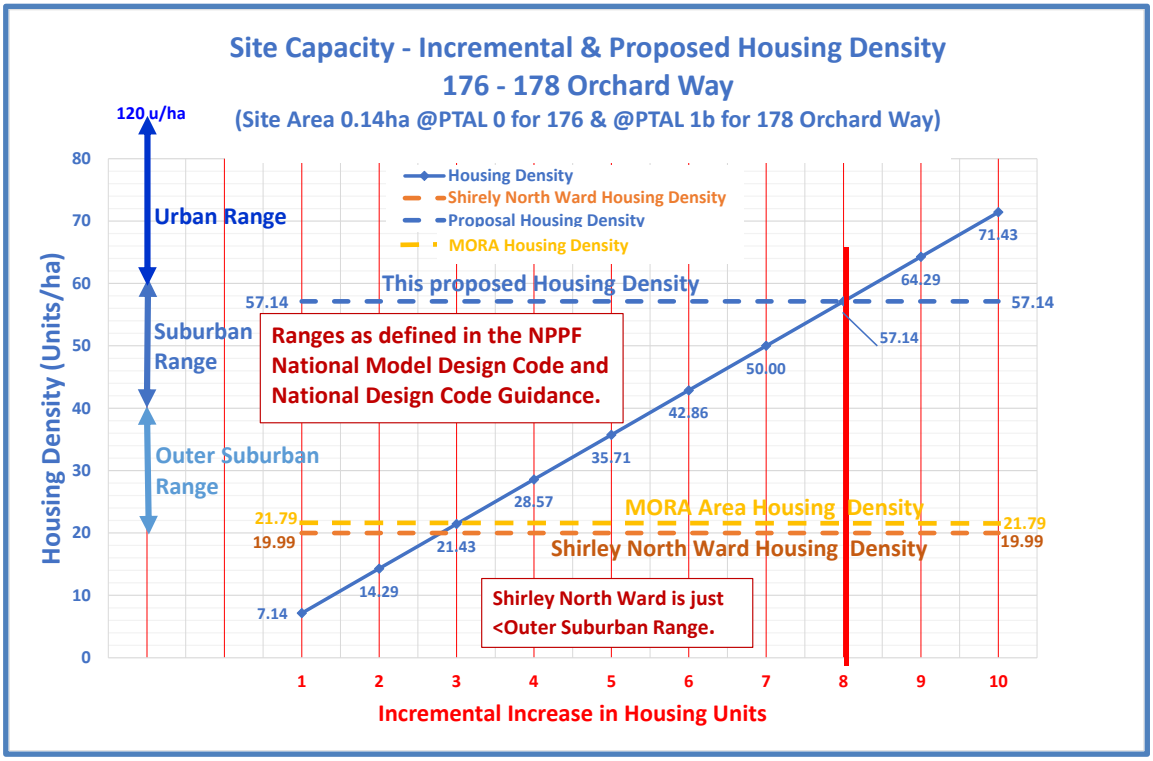
2.4.6 This proposal has a Site Area of **0.14ha** and **8 units** has a Housing Density of **57.14Units/ha** which is in the **NPPF Design Code (NMDC) range of 40 to 60 Units per Hectare**, just within the ***maximum*** **Suburban Range of 60 Units/ha** indicating a significant over development for the locality which is designated **Outer-Suburban** by the N**PPF Design Code** recommendation.

2.4.7 The above analysis clearly puts the locality of Shirley Ward **Setting** at **≈20units/ha** in the lower end of the **Outer-Suburban Design Code category of between 20 and 40 units per hectare**.

2.4.8 Analysis of the **Housing Density** for a site area of **0.14ha** at **40Units/ha (Max Outer Suburban setting) is given by:**

$$y = 40 = \frac{\delta y}{\delta x} \cdot x + c \ (as\ c = 0), \quad therefore \quad \frac{\delta y}{\delta x} = \frac{71.43 - 7.14}{10 - 1} = 7.143$$

$$Then\ x = \frac{40}{7.143} = 5.59\ Units \approx 6\ Units\ maximum.$$



Therefore, the Site Capacity at **0.14ha** in an **Outer Suburban Setting** has a maximum Site Capacity of (5.59) **≡ 6 Units** but this proposal is for **8 Units,** which is clearly an over development for the **'Site Capacity'** of **0.14ha** between **PTAL Zero and 1b**.

Reason 3 Summary:

2.4.9 Therefore, irrespective of *NPPF Paragraph 130 which states that residential densities should be optimised and a significant uplift in density should be sought unless it can be shown to be clearly inappropriate.* We contend that the locality is **inappropriate** for significant uplift in Density from the Outer-Suburban to the maximum of the Suburban Setting as defined in the **NPPF Design Code** recommendation and is therefore, clearly an inappropriate uplift in Density and that it would be inappropriate to do so.

2.4.10 The **London Plan Policy D3** emphasises the need for **development proposals** to be within the **Site Capacity** and the above analysis clearly shows the **Site Capacity** of (5.39) ≡ **6 Units** maximum at **0.14ha Site Area** and **PTAL between Zero and 1b** and as such the proposal significantly exceeds this at **8 dwellings** if this proposal were to be allowed.

Reason 4 Evidence:

2.5 Residential Densities and Public Transport Accessibility:

2.5.1 It is NOT **Housing Units** that require supporting **Infrastructure,** (Public Transport, GP Surgeries, Schools) ***but people***. We therefore require an assessment of a **Residential Density** which is supported by the available infrastructure and **TfL** have devised a mechanism to do just that, in providing a relationship between **Public Transport Accessibility**[6] and **Residential Density** in habitable rooms per hectare. This again is a reference to a ***dwelling parameter*** rather than a ***people parameter,*** but it is a start. (The appropriate parameter for Residential Density is Bedspaces per hectare).

2.5.2 Assuming the TfL Densities and PTAL relationships incrementally increase linearly, we can assess the relative values of a proposal's **Residential Density** in relation to the site area (and capacity) and supporting PTALs in terms of Habitable Rooms and Bedspaces (persons) per hectare and arrive at the required PTAL to support the development proposal.

2.5.3 The Residential Density is then given by: $y = \frac{\delta y}{\delta x} \cdot x + c$ where:

y = Density and x = PTAL; then $\frac{\delta y}{\delta x}$ = rate of change of y wrt x, and $c = y$ when $x = 0$.

2.5.4 The linear increase in hr/ha and bedspaces/ha follow a parallel projection as shown in the illustration below such that Density comparisons can be made. The only difference being the value of "c."

2.5.5 The TfL PTAL at **176 Orchard Way is Zero (0)** and at **178 Orchard Way is 1b** (an assumed analysis of **PTAL's** 1a & 1b are numerically equivalent to 1a ≡ 0.66 and 1b ≡ 1.33).

2.5.6 Using the function $y = \frac{\delta y}{\delta x} \cdot x + c$ the proposed density in hr/ha and bedspaces/ha is:

271.43 = (250-150)/(3-0)· x + 150 therefore x = PTAL = **3.643** for **hr/ha**, and

[6] http://content.tfl.gov.uk/connectivity-assessment-guide.pdf

242.86 = (215-120)/(3-0)· x + 120 therefore x = PTAL = **3.880** for **bedspaces/ha**

Whereas the actual PTAL is between **zero (0)** and **1b (numerically ≡ 1.33)**

At PTAL Zero the Residential Density **should** be:

y = (250 - 150)/3 x 0 + 150 = **150 for hr/ha**, and

y = (215 - 120)/3 x 0 + 120 = **120 for bedspaces/ha.**

and at **PTAL 1b ≡ 1.33**

y = (250 - 150)/3 x 1.33 + 150 = **194.33 for hr/ha**, and

y = (215 - 120)/3 x 1.33 + 120 = **162.11for bedspaces/ha.**

2.5.7 The Graphical Illustration (below) analysis shows that the incremental Increase in hr/ha and bedspaces/ha follow a similar (parallel) progression but are separated by a different value of "c" in the function

$y = \frac{\delta y}{\delta x} \cdot x + c$ for habitable rooms/ha, c = 150 and for Bedspaces/ha c = 120. But the incremental increases of both follow a parallel incremental progression.

2.5.8 Therefore the Residential Densities, whether measured in hr/ha or bedspaces/ha require a significant increase in Public Transport Accessibility from the available PTAL of Zero and 1b (≡ 1.33) to between **PTAL 3.64** and **3.88** depending on the method of analysis, when the available **PTAL** for 176 Orchard Way is Zero and 178 Orchard Way is 1b (≡1.33).

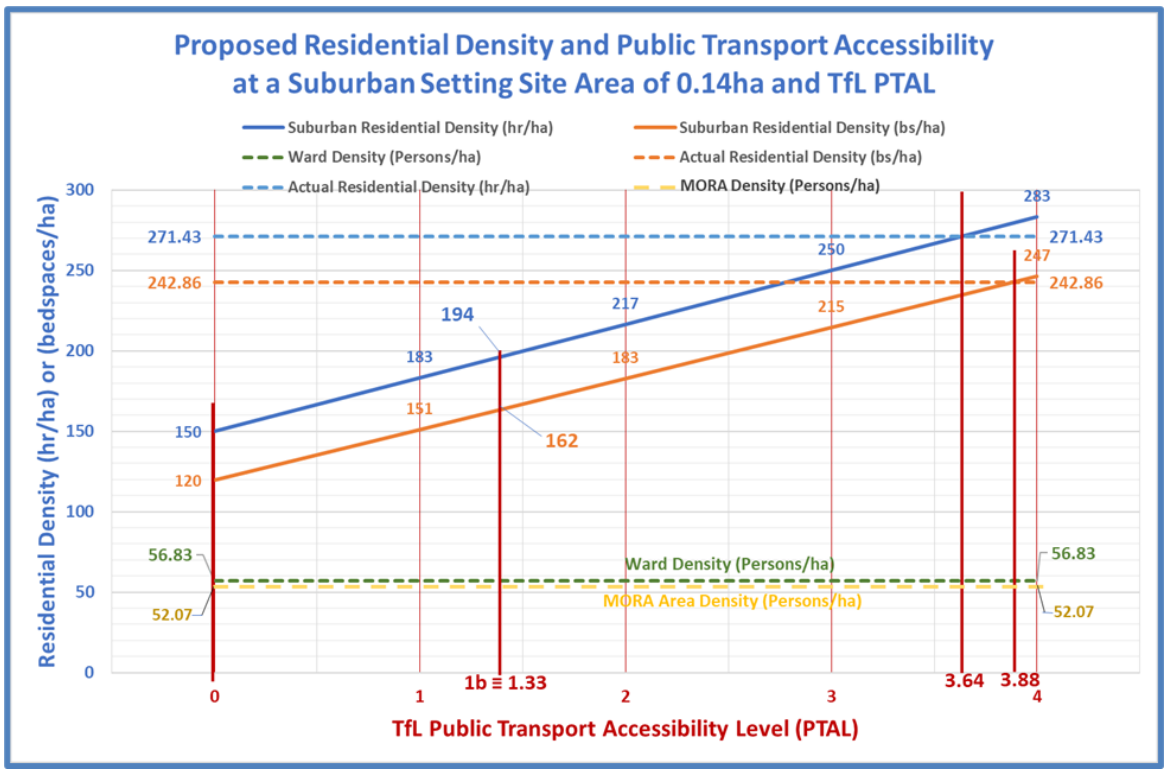


Illustration of Relationship between Residential Density in hr/ha & bedspaces/ha and required Public Transport Accessibility (PTAL)

Reason 4 Summary:

2.5.9 Thus irrespective of *NPPF Paragraph 130 which states that residential densities should be optimised and a significant uplift in density should be sought unless it can be shown*

to be clearly inappropriate. We contend that the locality is inappropriate for significant uplift in Density as the Public Transport Accessibility at this Site would preclude an increase in Residential Density due to the very low accessibility to **Public Transport services at PTAL zero and 1b** but would require a **PTAL** between **3.64** at **271.43hr/ha** and **PTAL 3.88 at 242.86 bedspaces/ha** and as there is no prospect of improvement of public service infrastructure in the foreseeable future the increase in **Residential Density** would be extremely inappropriate.

Reason 5 Evidence:

2.6 Site Capacity - Residential Density (Site Occupancy)

2.6.1 Transport for London Accessibility Level[7] provides guidance on the appropriate Residential Densities at various PTAL levels in the range 0 to 6.

2.6.2 The proposal **Site Capacity** is limited by the available public transport accessibility of **PTAL 0** for 176 Orchard Way and **PTAL 1b** for 178 Orchard Way, The Site can only accommodate a maximum Residential Density of **28 occupants** within the PTAL Range 0 to 1. Whereas the proposal is for **34 occupants**.

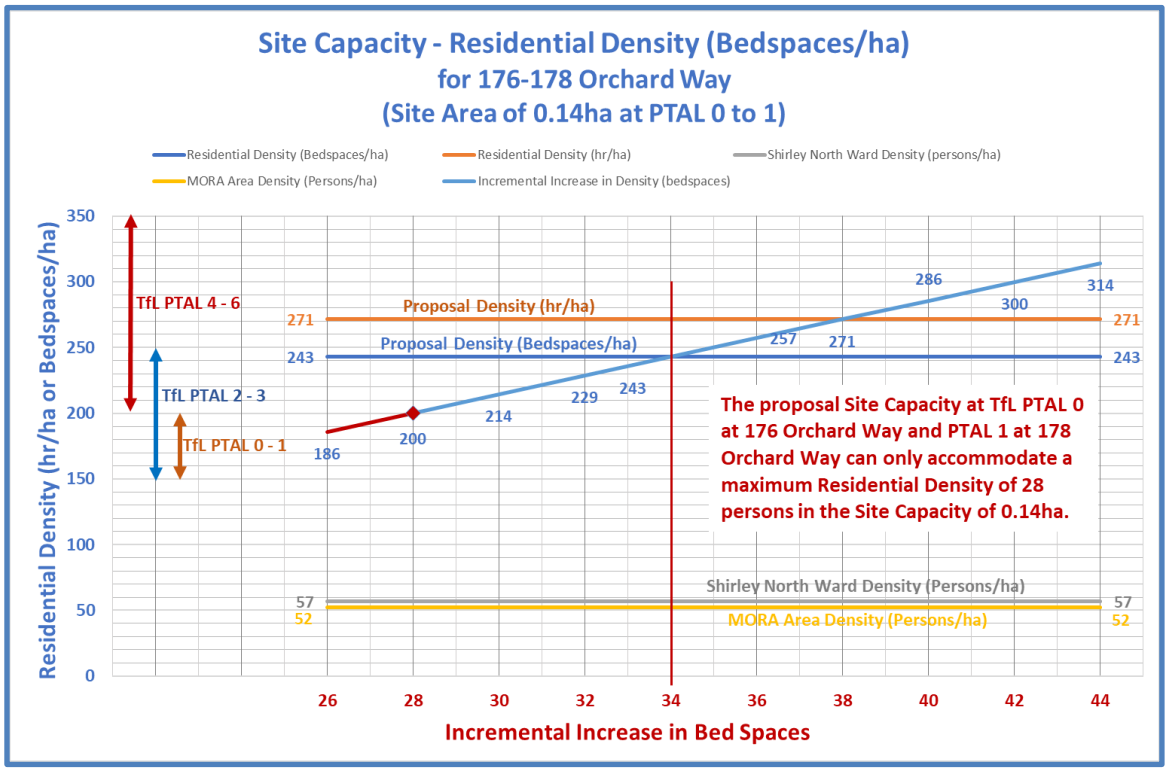


Illustration of Site Capacities in hr/ha & Bedspaces/ha at 176-178 Orchard Way for Site Area of 0.14ha and PTALs

Reason 5 Summary:

2.6.3 The proposal's Residential Densities are excessive for the Site Capacity which shows the proposed Residential Density is clearly inappropriate for the Setting and the Site Area.

[7] https://content.tfl.gov.uk/connectivity-assessment-guide.pdf

2.6.4 The London Plan Policy D3 requires new developments to make best use of land following a design-led approach that optimises site capacity. The Site capacity is Clearly exceeded in terms of the Number of Units and Occupancy.

2.6.5 The Site of Area 0.14ha has a capacity of 28 bedspaces whereas the proposal is squeezing 34 bedspaces into this site of 0.14ha and at PTAL between Zero and 1b.

Reason 6 Evidence:

2.7 **Boundaries and Curtilages:**

2.7.1 A further indication of **over development** is clearly evident in the site plans which show the developer was required to modify the boundary curtilages of **Plots 4, 5, 6 & 7** in order to ***squeeze*** into the site capacity, the **off-street parking** requirements into the available site area which compromises the Boundaries and curtilages of the proposed developments and compromises the **Site Capacity**.

Proposed Site Plans and Boundaries defining curtilages of each plot

2.7.2 The **Plot 4** Boundary (between **Plots 4 & 5**) has been modified to accommodate the parking space for **Plot 5's** vehicle. This may be a car, or a van used by the occupants of **Plot 5** parked mainly on the forecourt of **Plot 4** (if the curtilage remained unchanged) and in full view of the occupants of **Plot 4** from their single aspect Lounge window. If the vehicle is a Van for use by the occupants of **Plot 5** for their business or working use, and is of normal height, it would severely restrict the occupants of Plot 4's Amenity afforded to occupants of Plot 4 and their daylight into their lounge. It would also limit the field of view from **Plot 4's** Lounge window. This is unreasonable and unacceptable for the future occupants of Plot 4 for the life of the development.

2.7.3 Why should future occupants of Plot 4 dwelling have someone else's vehicle parked on what would normally be considered their forecourt, visible constantly from their lounge single aspect window for the life of the development? Truly unacceptable.

Reason 6 Summary:

2.7.4 Thus, again, irrespective of ***NPPF Paragraph 130 which states that residential densities should be optimised and a significant uplift in density should be sought unless it can be shown to be clearly inappropriate.*** **We contend** the proposed development is clearly inappropriate and indicates that the site capacity has been compromised and breached by the need to modify the Boundaries and curtilages in order to accommodate on-site parking provision but would be totally unacceptable to future occupants for the life of the development.

Reason 7 Evidence:

2.8 Car Parking Appellant's Grounds of Appeal Para 6.17

2.8.1 We do not agree with the following assessment from the appellant: *"The appellant does acknowledge the advice in SPD regarding car parking. However, there is simply no scope to put parking in the rear of the properties due to the shape and dimensions of the plot. But the appellant has used changes to the front building line in a 'positive sense' to break up the frontage car parking*."

2.8.2 There is no scope to put parking at the rear of the properties due to capacity limitations of the site both in Area and configuration. There would be capacity for less units and less park need which is confirmed by the **Local Design Code** for this locality.

Proposed Site Plans and Boundaries defining curtilages of each plot

2.8.3 **It is inappropriate to claim that the shape and dimensions of the site restricts the scope of parking provision as this is a function of the available "Site Capacity".**

2.8.4 **Plot 6** encroaches on the **Plot 7** curtilage to allow two parking spaces for Plot 6 which require double shunting for ingress or egress. This is not a satisfactory configuration.

Reason 7 Summary:

2.8.5 These modifications to the conventional building separation and usual configuration of Plot Boundaries and curtilages are the result of an unacceptable design and further **proof of overdevelopment** for the available **site capacity**.

2.9 In summary,

2.9.1 The proposed development's location is inappropriate for ***"Incremental Intensification"*** London Plan **Para 4.2.4** and yet it exceeds the appropriate housing density recommended by the **NPPF Model Design Code** for **Outer (London) Suburban** locations of 20 to 40 Units/ha. At 57.14Units/ha the proposal exceeds the Outer Suburban Range of 20 to 40Units/ha but at 57.14 Units/ha is just within the maximum Suburban Range of 40 to 60Units/ha, indicating a significant over development for the locality.

2.9.2 It would also provide an unacceptable **Residential Density** for the available **Public Transport Accessibility (PTALS 0 to 1b)**. The proposal would require **PTALs of 3.643 for hr/ha, and 3.880 for bedspaces/ha.** The further evidence of squeezing off-street parking bays within the limits of the site requiring deviation of the boundaries and curtilages of Plots, provides further evidence of Overdevelopment of the **'Site Capacity'** in contravention of the **London Plan Policy D3.**

2.9.3 We have conclusively shown that the proposed increase in **Housing** and **Residential Density** for this location is clearly inappropriate as defined in the **NPPF Model Design Codes** and the **TfL WebCAT**. The Site Capacity is insufficient for the proposal as put before the LPA**.**

3 Appellant's Grounds of Appeal para 6.2

3.1 *6.2 London Plan Policy D3 requires new development to make best use of land following a design-led approach that optimises site capacity. Boroughs should encourage development on windfall sites. On suitable and available brownfield sites, Boroughs are required to optimise their potential for housing delivery. Small sites are one particular source where housing delivery should be optimised. Policy H1 sets out Croydon's 10-year housing target for net completions of 20,790. In hand with Policy H1, Policy H2 sets out that Boroughs should proactively support new homes on small sites of less than 0.25ha. These sites should be able to significantly increase new dwellings to meet London's needs together with helping diversify the source, location, type and mix of housing supply.* ***The policy sets down a minimum small-site target for Croydon of 6,410 net housing completions for the 10-year period to 2028/29.***

3.2 MORA observation and comment on Appellant's Grounds Para 6.2

<u>Reason 8 Evidence</u>:

3.3 Croydon Plan Review (2019):

3.3.1 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) which gives the target for the whole of the *'Shirley Place'* at between 360 to 460 units spread over the 20 years of the Plan, giving yearly targets of 18 to 23 units year-on-year.

3.3.2 This is an average of 20.6 dwellings per year for the life of the plan and can be seen in the LPA's published (2019) Croydon Local Plan Review – Issues and Options, "where it clearly states, "Homes by Place (2019-2039)"; including the *'Shirley Place'* (which

includes both the Shirley North and Shirley South Wards). i.e., targets Broken down by *"Place"* not by Ward.

3.3.3 The MORA Post Code area application approvals for 2019 as shown in the tables below have provided an additional 48 dwellings which is over double the yearly quota for the whole of the 'Shirley Place' at an average of 20.6 dwellings per year. For 2020 it is 23 dwellings and so far for 2021 it is 32 dwellings, including this application.

Reason 8 Reasons:

3.3.4 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[8] (after the Ward boundary changes) so the MORA area is only an exceedingly small portion of the 'Shirley Place' as defined by the Croydon Local Plan yet has contributed over double the target for the whole of the Shirley "Place". If there is no upper limit to the Target for *'Shirley Place,'* why is our local area targeted for higher densities than the rest of the *'Shirley Place'* when the area is considered *"inappropriate"* for *'Incremental Intensification'* (London Plan para 4.2.4)?

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

2.3.5 Recent Development proposals:

Year 2019

Location	Reference	Approval Date	Existing Dwellings	New Dwellings	Overall
20-22 The Glade	18/05928/FUL	01/02/2019	0	2	2
10-12 Woodmere Close	19/00051/FUL	27/02/2019	0	1	1
9a Orchard Rise	18/06070/FUL	21/03/2019	1	9	8
32 Woodmere Ave.	19/00783/FUL	20/06/2019	1	7	6
18a Fairhaven Ave.	19/01761/FUL	20/06/2019	1	9	8
17 Orchard Ave.	19/00131/FUL	06/11/2019	1	8	7
56 Woodmere Ave.	19/01352/FUL	24/10/2019	1	9	8
14-16 Woodmere Close	19/01484/FUL	23/10/2019	0	1	1
37 Woodmere Ave.	19/03064/FUL	26/09/2019	1	8	7
Totals			6	54	48

[8] http://www.mo-ra.co/about/area/

Year 2020

Location	Reference	Approval Date	Existing Dwellings	New Dwellings	Overall
151 Wickham Road	19/04149/FUL	18/03/2020	0	5	5
16-18 Ash Tree Close	19/04705/FUL	27/02/2020	2	8	6
174 The Glade	20/01968/FUL	27/07/2020	1	2	1
116 Orchard way	20/05960/FUL	12/05/2020	1	4	3
195 Shirley Road	19/06-37/FUL	22/09/2020	1	9	8
Totals			5	28	23

Year 2021

Location	Reference	Approval Date	Existing Dwellings	New Dwellings	Overall
116 Orchard Way	20/05960/FUL	12/05/2021	1	4	3
176-178 Orchard Way	21/01635/FUL	Appealled	2	8	6
81 The Glade	21/00108/FUL	Appealled	1	9	8
34 Woodmere Ave.	21/02212/FUL	Waiting	1	6	5
21 Woodmere Gardens	21/03702/FUL	Waiting	1	9	8
75 Shirley Ave.	21/02622/FUL	Waiting	1	4	3
13 Gladeside	21/03518/FUL	Waiting	1	6	5
27 Orchard Rise	21/04094/FUL	Waiting	1	4	3
46 The Glade	21/05741/FUL	Waiting	1	9	8
Land R/O Firsby Ave.	21/06036/FUL	Waiting	0	9	9
Totals			10	68	58

Year 2022

Location	Reference	Approval Date	Existing Dwellings	New Dwellings	Overall
44 Orchard Avenue	21/05950/FUL	Waiting	1	8	7
Totals			1	8	7

Recent Development approvals and proposals in the MORA Post Code Area

3.3.5 The cumulative average estimated over the period is:

(48 + 23 + 35 +7)/(3+1/12) = 36.64 per year (up to end Jan 2022) which is for just the MORA post code area, a 77.8% increase above the 20.6 target for the Shirley Place.

3.3.6 This clearly shows cumulative dwellings significantly exceed the strategic target defined in the Local Plan Review of 20.6 dwellings average per year. The MORA Post Code Area applications, approvals and waiting approval for 2019 to 2021 dwellings are as shown in the Tables above.

3.3.7 The 2021 number of planned dwellings in the MORA Post Code Area has already exceeded the Target for 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 visibly spent in the MORA area to improve the Public Transport Accessibility to support these increases in local Residential Densities.

Reason 8 Summary:

2.4.1 Thus we have conclusively proved that the Strategic Targets for the Shirley area have been met and significantly exceeded. The policy sets down a minimum small-site target for Croydon of 6,410 net housing completions for the 10-year period to 2028/29 *of which Shirley North Ward has exceeded their proportion overwhelmingly.*

4 Conclusion for dismissal.

2.5.1 We have evaluated the proposed development against the fully agreed National and Local adopted Planning Polices and have clearly demonstrated the inappropriateness of the proposed development using detailed evidence and analysis base on the substance of those Policies.

2.5.2 The Revised Croydon Local Plan is currently undergoing Regulation 19 appraisal and there are no significant modifications which would change the above carefully assessed reasons for refusal and dismissal of the appeal of this proposed development.

2.5.2 We therefore urge the Inspectorate to consider our investigation and evidence provided in this representation and dismiss the appeal on the grounds aforementioned.

Kind regards

Derek

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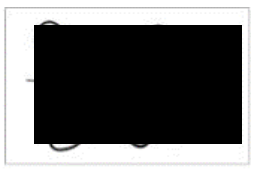

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