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**Monks Orchard
Residents 'Association
Planning**

7th March 2025

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Reference: 24/04217/FUL
Application Received Thu 12 Dec 2024
Application Validated Tue 11 Feb 2025
Address: 23 Woodland Way Croydon CR0 7UB
Proposal: Demolition of existing dwelling and erection of 2 x 4-bed dwellings with associated parking, cycle and refuse storage.
Status: Awaiting decision
Case Officer: Tracey Williams
Consultation Date: Fri 14 Mar 2025
Determination Deadline Tue 08 Apr 2025

Dear Ms Tracey Williams – Case Officer

Please accept this **representation** from the **Monks Orchard Resident's Association** to the proposed Application **Ref: 24/04217/FUL** for Demolition of the existing dwelling and the erection of 2 x 4-bed dwellings with associated parking, cycle and refuse storage at **23 Woodland Way Croydon CR0 7UB**.

The Proposal Parameters:

| 23 Woodland Way | | | App Ref: 24/04217/FUL | | | | | | | | |
|--------------------|------------|--------|-----------------------|-----------------|----------------|----------------------------|----------------------------|-----------------------------|-------------------------|--------------------------|--|
| Site Area | 860 | sq.m. | Supplied Drawings | | | Floor Area Ratio | | 0.29 | | | |
| D&A | 0.086 | ha | Bedrooms Density | | 4.00 | b/Unit | Plot Area Ratio (PAR) | | 0.17 | | |
| App Form | 0.89 | ha | Residential Density | | 139.53 | bs/ha | Floor Area Ratio (FAR) | | 1.70 | | |
| footprint | 145.6 | sq.m. | Housing Density | | 23.26 | U/ha | PTAL | 2011 | 0.66 | (1a) | |
| Units | 2 | | Average Occupancy | | 6.00 | bs/unit | PTAL | 2021 | 0.66 | (1a) | |
| Floor Area | 247 | sq.m. | Area Type | | Outer Suburban | | PTAL | 2031 | 0.66 | (1a) | |
| Unit | Type | Floor | Bedrooms (b) | Bed Spaces (bs) | GIA (Offered) | GIA (Required) (Table 3.1) | In-Built Storage (Offered) | In-Built Storage (Required) | Amenity Space (Offered) | Amenity Space (Required) | |
| Plot 1 | Not Stated | Ground | 0 | 0 | | | 5.0 | 3.0 | 178.00 | 9 | |
| | | First | 4 | 6 | | | 1.0 | | | | |
| Sub Totals | | | 4 | 6 | 123.5 | 106.00 | 6.0 | 3.0 | 178.00 | 9 | |
| Plot 2 | Not Stated | Ground | 0 | 0 | | | 5.0 | 3.0 | 180.00 | 9 | |
| | | First | 4 | 6 | | | 1.0 | | | | |
| Sub Totals | | | 4 | 6 | 123.5 | 106.00 | 6 | 3.0 | 180.00 | 9 | |
| Grand Total | | | 8 | 12 | 247 | 212 | 12 | 6 | 358 | 18 | |

Notes:

The **Application Form** indicates a **GIA of 160 sq.m.** whereas the measured **GIA per Unit** is **≈123.5sq.m.** i.e., a total of **≈247sq.m.** (scaled off the supplied drawings).

We note that the **Application Form Site Area** is quoted at **0.09ha** whereas the **Design & Access Statement** indicates a **Site Area of 0.086ha \equiv 860 sq.m.**

In other respects, we agree with the parameters provided on the supplied drawings.

It should be Noted that No copyright infringement is intended. We do not own nor claim to own the rights to any of the Applicant's Evidence shared in this submission. The material is used for the sole purpose of commentary and criticism, which falls under the "Fair Dealing" 'doctrine' of UK copyright law.¹

Initial Observations

The **Site Area** is overgrown with natural vegetation, and it is understood the bungalow has been severely neglected and is rather dilapidated.



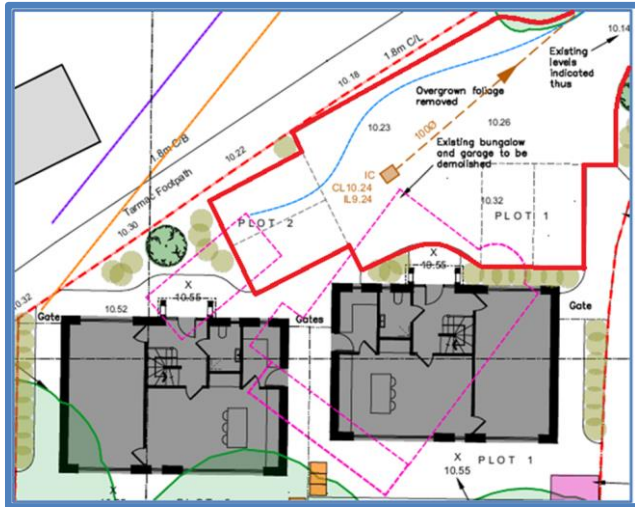
Google Earth Image showing approx. Site Area of significant overgrowth vegetation and the public footpath access from woodland Way to Firsby Ave.

The Local **PTAL** at **Post Code CR0 7UB** is **1a \equiv 0.66** currently and forecast to remain at **PTAL 1a** until **2031**. The proposal would have **Housing Density of 23.26Units/ha** which is within the Local **Area Type**² setting of '**Outer [London] Suburban**' (i.e., **≥ 20 Units/ha to ≤ 40 Units/ha**).

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

² <https://www.gov.uk/government/publications/national-model-design-code>

Parking Ingress & Egress



It is not clear from the Plans provided, whether it would be possible for a vehicle to **enter/exit** from **any** of the **4 parking bays** in a **forward or reverse gear**. **Swept Path** illustrations should be provided showing how this could be achieved within the boundaries of the proposed porous hard surface Drive, with all other **Bays occupied**. Proof is required that entry and exit in a **forward gear** is possible if entered in a **forward gear**, and whether a **three-point turn** is possible to also exit in a **forward gear**.

Validation Checklist - Transport - Assessment / Statement:

“**Swept path drawings should be provided** showing entrance requirements from the public highway into the development site for a range of vehicles, including a 4.8m long car and any required servicing, waste, or emergency vehicles.”



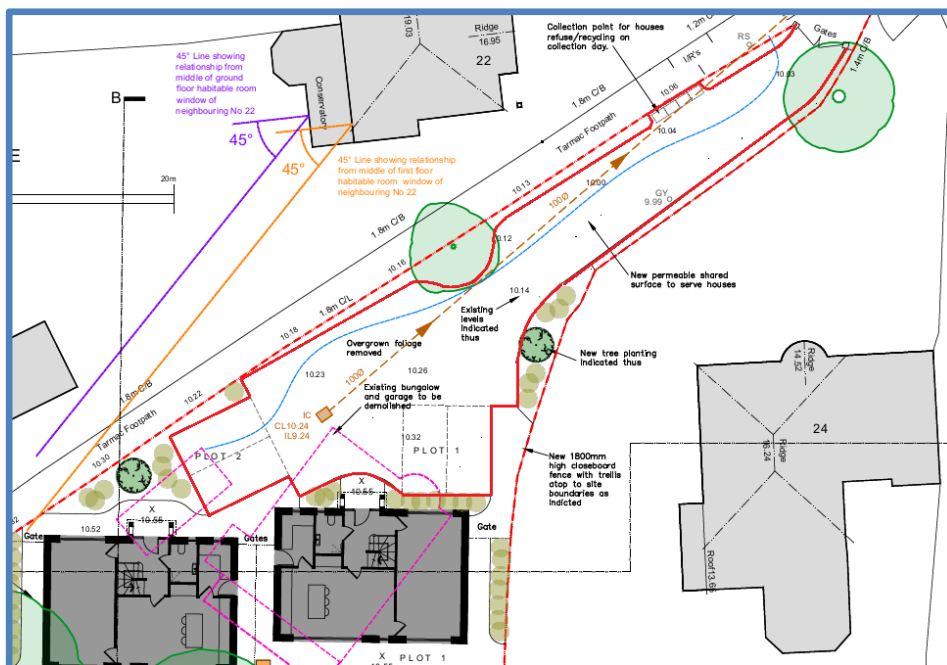
Entrance to 23 Woodland Way showing Fire Hydrant and entrance to public footpath to Firsby Avenue

We have not been able to assess with accuracy, whether the entrance to the site by a family sized vehicle would be possible between the entrance to **24 Woodland Way** and the entrance to the **Public Footpath to Firsby Avenue**, restricted by the **Fire hydrant Notice** located at the side of the **Access**.

Would it be necessary to move the **hydrant notice**?

Scaling off the provided block diagram indicates a **width between proposed new Gateposts of ≈2.5m, restricted by the Fire hydrant Notice**. The type of car greatly affects the size or dimensions of the car park. An ordinary SUV has dimensions of **4.9 meters to 5.8 meters in length**, and a **width of 1.8m to 2.1m** which would leave **20cm (0.2m) clearance each side** (rather tight).

It is proposed that **Refuse & Recycling Bins** are located within this boundary including possible **Bulk Waste collection point**, which may also **restrict the passage of vehicles**.



Extract from block diagram illustrating access to the site

The proposal includes provision of a new permeable shared hard surface to serve both dwellings.

The Car Parking guidance provision for **≥3 Bedroomed Units** in **Outer London Boroughs** at **PTAL 1a** is **1.5 spaces/Unit**. The proposal meets and exceeds this requirement at **2 spaces per unit**.

There is adequate 'Play Space' (40sq.m. per dwelling) for the probable **4 Children per Unit**, at **178 and 180 sq.m.** for each Unit respectfully.

There is adequate **In-Built Storage** for each Unit.

The **Block Plan** illustrates there is **No Overlooking** or **invasion of privacy** consequences with any adjacent dwelling.

Fire Safety Planning Statements

The **London Plan 2021** introduced a new requirement for fire safety information to be submitted with **planning applications**. The relevant statement or exemption statement needs to be submitted at **validation stage**. We do not believe the **Fire Statement** provided meets these requirements.

The **Fire Safety Planning Statements Item 4** states: *“State what, if any, consultation has been undertaken on issues relating to the fire safety of the development; and what account has been taken of this.”*

*“**No consultation** has currently taken place regarding **fire safety issues** due to the relatively **small scale and impact of the proposed development**. The application includes the proposed floor plans of both dwellings with an **anticipated consultation with the Fire Authority.**”*

However, the **validation checklist** states that **All applications** need a supporting statement setting out the **fire strategy for the site**.

London Plan Policy D12 Fire safety

A *In the interests of fire safety and to ensure the safety of all building users, **all development proposals** must achieve the **highest standards of fire safety** and ensure that they:*

- 1) *identify suitably positioned unobstructed outside space:
 - a) for **fire appliances to be positioned** on
 - b) appropriate for use as an **evacuation assembly point***
- 2) *are designed to incorporate appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire; including appropriate fire alarm systems and passive and active fire safety measures*
- 3) *are constructed in an appropriate way to minimise the risk of fire spread*
- 4) *provide suitable and convenient means of escape, and associated evacuation strategy for all building users*
- 5) *develop a robust **strategy for evacuation** which can be periodically updated and published, and which all building users can have confidence in*
- 6) *provide suitable **access** and equipment for firefighting which is **appropriate for the size and use of the development.***

None of these requirements have been addressed within the proposed offered documentation.

LONDON PLAN Policy D12 para 3.12.3/4 states:

3.12.3 Applicants should demonstrate on a site plan that space has been identified for the appropriate **positioning of fire appliances**. These spaces should be kept clear of obstructions and conflicting uses which could result in the space not being available for its intended use in the future.

3.12.4 Applicants should also show on a site plan **appropriate evacuation assembly point**. These spaces should be positioned to ensure the safety of people using them in an evacuation situation.

Neither of these **London Plan Policy requirements** have been met. There is no defined evacuation assembly point.

It is our understanding that **Building Regulations and Fire Service guidance Approved Document Part B³ Section 13 Vehicle Access** states:

"B13.1 Access for a pumping appliance should be provided to within 45m of all points inside the dwellinghouse".

Table 13.1 states:

Minimum Width of Road (Kerb to Kerb) : 3.7m
Minimum Width of Gateways : 3.1m
Minimum Turning Circle between kerb (pump) : 16.8m
Minimum Turning Circle between walls : 19.2m
Minimum Clearance in Height : 3.7m
Minimum Carrying Capacity (tonnes) : 12.5-tonnes

A **Fire Appliance** would be required to attend a fire in either of the proposed dwellings. A **Fire Appliance** vehicle with **high pressure pump** therefore needs to be within **≥45m** of **any part** of the **proposed development** to be reached by **Pressurised Hose**.

It is NOT possible for a **Fire Appliance** to enter the Drive with **Gateposts** of **≈2.5m** width which is **restricted by the Fire hydrant Notice** (See Photograph above).

The Distance from a **Parked Fire Appliance** in **Woodland Way** would be **≈60metres** from the **furthest corner of Plot 2**. This exceeds the **B 31 limit of 45m by 15m**. and we are convinced this cannot physically be achieved and would therefore be an **unacceptable Fire safety hazard**.

An authoritative **Fire Safety Assessment Report** may require the 2 Units to be fitted with a more comprehensive 'Fire Alarm System' and/or a comprehensive 'Sprinkler System' due to the access limitations to the site by fire appliances and fire fighters, but this requires the provision of a **Fire Safety Report** assessment by a suitably qualified assessor, which is clearly absent from the proposal.

Refuse & Recycling

Validation Checklist - Refuse and recycling strategy:

A plan and supporting explanation should be provided explaining how waste and recycling storage (and access to and from it) is proposed, in some cases including bulky goods storage, with reference to the Council's Waste and recycling guidance. Croydon Local Plan (2018) Policy DM13.

³ <https://www.gov.uk/government/publications/fire-safety-approved-document-b>

Access should also be shown, with drawings of the locations of dropped kerbs for roadside access or swept path analysis for collection vehicles entering the site. London Plan (2021) Policy T4, T5 and T6

Unit 1 and 2 residents would need to pull their refuse/recycling bins **≈50m** to the **position nearer the entrance to the site** for the **weekly collections**, due to the irregular site configuration.

The allocation of bin space for collection days are at the end of the access drive on the North boundary, **which may restrict the width available for vehicles entering/leaving the site.**

Flood Risk Assessment

All applications require a **Flood Risk Assessment (FRA)**, even if not in areas at risk of flooding, to demonstrate that they are not contributing to flood risk. This should be appropriate to the scale, nature and location of the development and refer to the Strategic Flood Risk.

Access should also be shown, with drawings of the locations of dropped kerbs for roadside access or swept path analysis for collection vehicles entering the site.

Again, there are no supplied Documents to meet these requirements.

Transport Assessment / Statement

For **minor applications**, a Transport Statement (TS) should outline the transport aspects of the application including parking, cycle parking, servicing, and refuse. This information may be incorporated into other required validation documents such as the planning statement.

CLP 2018 Policies SP8, DM29 and DM30

Swept path drawings should be provided showing entrance requirements from the public highway into the development site for a range of vehicles, including a 4.8m long car and any required servicing, waste, or emergency vehicles.

If a parking stress survey is carried out, this should be scoped with the Council's Strategic Transport team (Transportationplanning@croydon.gov.uk) at pre-application stage, and surveys should be included within the TA/TS.

Croydon Local Plan - Local Character

Strategic objectives

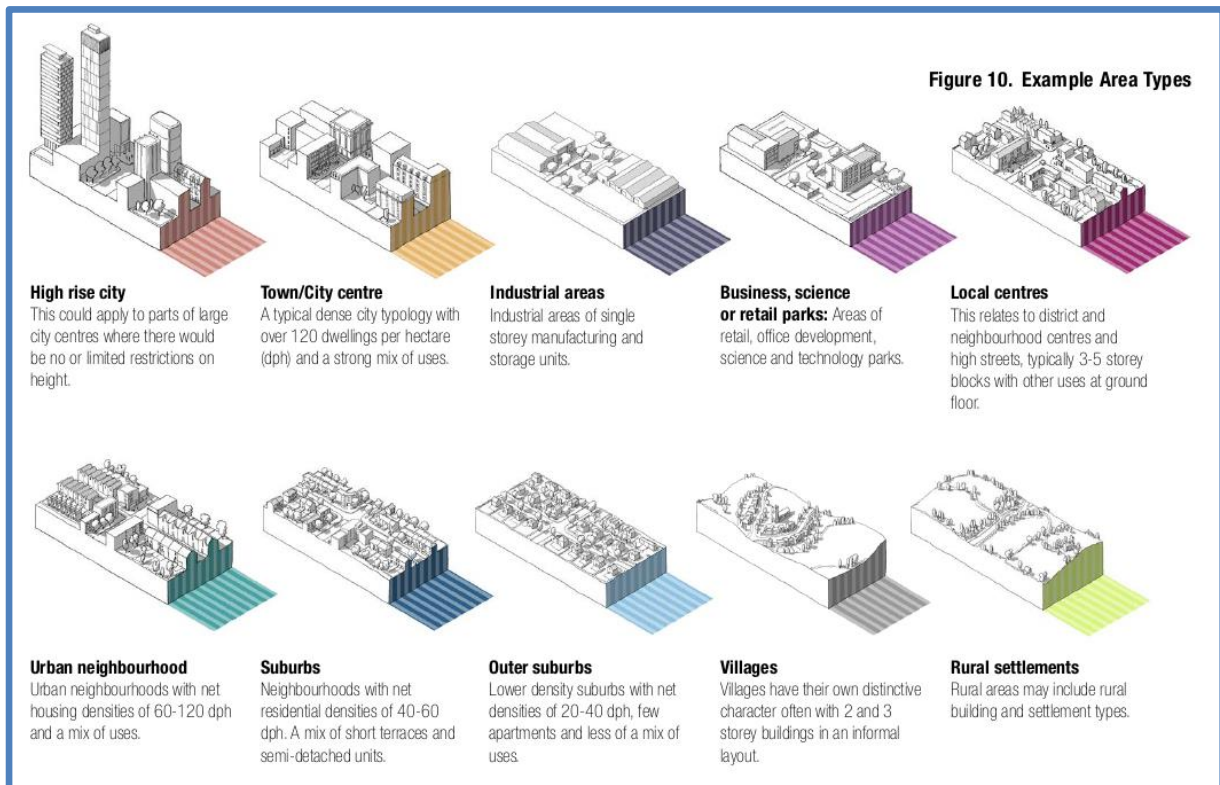
- 6.30** A fundamental part of achieving high quality-built environments is through understanding the local character and the qualities which contribute to local distinctiveness.
- 6.31** In specific areas where it is unclear which predominant character should be referenced; additional place specific development management policies have been included. These can be found in (The Places of Croydon) of this Plan.

A more **comprehensive assessment of Local Character** is defined in the **National Model Design Code & Guidance (2021)** ⁴ as referenced from the **NPPF para 129 (2021)** and **NPPF para 134 (2023 >)** [*identical wording*].

134. Design guides and codes can be prepared at an **area-wide, neighbourhood or site-specific scale**, and to carry weight in **decision-making** should be produced either as part of a plan or as supplementary planning documents. Landowners and **developers** may contribute to these exercises, but may also choose to **prepare design codes in support of a planning application for sites they wish to develop**. Whoever prepares them, all guides and codes should be based on effective community engagement and reflect local aspirations for the development of their area, taking into account the guidance contained in the **National Design Guide and the National Model Design Code**. **These national documents should be used to guide decisions on applications in the absence of locally produced design guides or design code.**

This should be used to **guide decisions in the absence of Locally defined Design Codes**, which is the case with both the **Current and Revised - Croydon Local Plans**.

Area Types



National Model Design Code & Guidance 'Area Type' Definitions (advised)

The local **Area Type** settings recommended by the **National Model Design Code & Guidance** are:

⁴ <https://www.gov.uk/government/publications/national-model-design-code>

| Area Type | Housing Density | Residential Density ⁵ |
|----------------------------------|---------------------|----------------------------------|
| Rural | <20 Units/ha | <47.2 persons/ha |
| Outer [<i>London</i>] Suburban | >20 & <40 Units/ha | >47.2 & <94.4 p/ha |
| Suburban | >40 & <60 Units/ha | >94.4 & <141.6 p/ha |
| Urban | >60 & <120 Units/ha | >141.6 & <283.2p/ha |
| Central | >120 Units/ha | >283.2 p/ha |

In accordance with the current **NPPF of December 2023 at para 134**, **The National Model Design Code & Guidance (2021)** should be used to **“Guide decisions”** in the **absence** of locally produced **“Design Guides” or “ Design Codes”**.

We have **not** found any such locally defined **“Design Guides or Design Codes”** in the current **Croydon Local Plan (2018)** or the **Revised Croydon Local Plan (2024)** which is currently the subject of **Regulation 19** consultation; **thus, we are assessing the proposal on the National Guidance as specifically required by the NPPF (2021 para 129 & later versions at para 134⁶)**

Area Type Definition

“Parts of the local area that share common features and characteristics. For example, a suburban area type might bring together a number of different housing estates with common densities, heights, building line, party wall condition etc.)under the umbrella term “outer suburbs.” Common rules and parameters can then be applied to the “outer suburbs” area type in the design code. Example area types are provided in the National Model Design Code, but in practice Area Types should be defined locally.”

It would be extremely helpful if the **Croydon Local Planning Authority (LPA)** had defined the local **Area Types** for the **Places of Croydon** but that has not been forthcoming. However, if Croydon LPA disagree with the recommendation in the **National Model Design Code & Guidance**, we would request why Croydon should be any different to the National Guidance, and what those difference were.

The simplest method for locally defined **Area Types** is that bounded by the **Post Code** of the proposed development. The **POST CODE for 23 Woodland Way** is **CR0 7UB**, which encompasses **1 to Serendipity & 32 Woodland Way. (40 Dwellings).**⁷

⁵ <https://www.statista.com/statistics/295551/average-household-size-in-the-uk/> (2.36 persons/Unit in 2023)

⁶ <https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system>

⁷ <https://www.tax.service.gov.uk/check-council-tax-band/search?postcode=hfGFCaTvxFSlIXdbt7yQYw&page=1>

Local Area Type



Estimate of Area Type parameter of Post Code CR0 7UB. $\approx 25073\text{sq.m.} \approx 2.5073\text{ha}$

Housing Density

The Post Code CR0 7UB therefore has **40 dwellings** in an area of $\approx 2.5073\text{ha}$ which equates to $\approx 15.953\text{units/ha}$ which clearly places the **Area Type** as defined by the **National Mode Design Code** in the range **Zero to 20Units/ha** i.e., in a **“Rural”** or less than an **‘Outer Suburban’ Area Type** setting.

The proposal is for **2 dwellings** on a Site Area of $860\text{ sq.m.} = 0.86\text{ha}$ giving a **Housing Density of 23.26U/ha** which is within the **‘Outer Suburban’ Area Type** setting advised by the **National Model Design Code and Guidance**.

Residential Density

Post Code CR0 7UB with **40 dwellings at the National Average Occupancy rate⁸** would be $40 \times 2.36 = 94$ persons in an area of 2.5073ha equates to $\approx 37.49\text{persons/ha}$ whereas the proposal would provide **12 bedspaces** in $860\text{ sq.m.} = 0.86\text{ha}$ giving a **Residential Density of 139.53bs/ha** .

As these relationships of **Housing and Residential Densities** are comparing ‘ratios’ of two similar parameters, using identical units, they can be rationally compared as meaningful relationships. From the above analysis it can be seen that the proposed development exceeds the **National Model Design Code & Guidance Area Type** by **45.803%**.

⁸ [UK average household size 2023 | Statista](https://www.statista.com/statistics/1102147/uk-average-household-size-2023/)

Local Area Type definition (Incremental Intensification)

London Plan Policy H2 Small Sites Para 4.2.4 Incremental intensification states:

Para 4.2.4 Incremental intensification of existing residential areas within **PTALs 3-6** or within **800m** distance of a **station**⁴⁷ or **town centre boundary**⁴⁸ is expected to play an important role in contributing towards the housing targets for small sites set out in Table 4.2. This can take a number of forms, such as: new build, infill development, residential conversions, redevelopment or extension of existing buildings, including non-residential

The locality of **23 Woodland Way** therefore at **PTAL 1a (≡ 0.66)** and **≥800m** from a **Train/Tram Station** or **District Centre** is **inappropriate for Incremental Intensification** or an increase of **45.8% in Housing Density** above that of the prevailing locality as defined by the **Local Post Design Code Area Type**.

Revised Croydon Local Plan (2018) 2024 (Housing Need)

[Extract from the Revised Croydon Local Plan \(2018\) 2024 – “Report to the Secretary of State on 29 November 2024”](#):

“Shirley.

5.4.111 Located at the eastern extent of the Borough, and mostly associated with low PTAL, although there is a local centre. The proposal in 2022 was for four allocations, although the latest proposal is for three.

5.4.112 Two of these are small sites, namely: Site 504 – is closely associated with a designated SINC (a cemetery) and would involve conversion of a locally listed pumping station for 24 homes (CLP 2018 states up to 68 homes; and Site 87 – is proposed for 9 homes, having been proposed for 18 homes in 2022 and up to 25 homes at the I&O stage. The scheme must deliver a replacement community centre.

5.4.113 The final site is then larger (Site 128), now proposed for 123 homes having been proposed for 91 homes in 2022. It is described by CLP 2018 as a ‘cleared site’ but includes significant mature vegetation.

5.4.114 The one omission site (Site 502) is located in the Green-belt but the CLP 2018 allocation (90 homes) assumes that development could occur without Green Belt release. A SINC is adjacent and PTAL is very low, hence there is little case for questioning the decision to delete the allocation.

[5.4.115 In conclusion, there is no reasonable option for significantly boosting housing supply.](#)”

This Statement, from the **Croydon LPA**, regarding **Housing Need** in the Revised Croydon Local Plan (2018) 2024 **Report to the Secretary of State on 29 November 2024**, has significant implications on the **assessment of applications** to meet **Housing Need** in the **Shirley North Ward** and **removes any pressure if a proposal would result overdevelopment of an Area Type Setting inappropriate for the locality.**

Conclusion

The proposal requires the demolition of an existing bungalow to be replaced by two detached Units of 4b/6p.

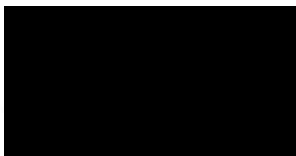
The proposal is located at the end of a Cul de Sac with a very narrow entrance, widening as progressed into the site of 0.086ha. Swept path drawings should be provided showing entrance requirements from the public highway into the development site for a range of vehicles, including a 4.8m long car and any required servicing, waste, or emergency vehicles.”

The proposal entrance is extremely restricted and would limit the size of vehicles which could reasonably be required to service the units.

The proposal does not include an acceptable Fire Safety Assessment as required by the Validation Checklist. An authoritative Fire Safety Assessment Report may require the 2 Units to be fitted with a more comprehensive ‘Fire Alarm System’ and/or a comprehensive ‘Sprinkler System’ due to the access limitations to the site by fire appliances and fire fighters, but this requires the provision of a Fire Safety Report assessment by a suitably qualified assessor, which is clearly absent from the proposal.

The Locality is clearly inappropriate for Incremental Intensification and from the above analysis it can be seen that the proposed development exceeds the National Model Design Code & Guidance Area Type by **45.803%**. and thus, does not reflect local character.

We therefore urge the Case Officer to refuse this proposal on grounds as stated above and request a revised proposal supported by an authoritative fire safety assessment.



Kind regards

Derek

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Cc:

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Cllr. Richard Chatterjee

Cllr. Mark Johnson

Shirley North Ward

Shirley North Ward

Shirley North Ward

Bcc:

MORA Executive Committee

Interested Parties