I am writing on behalf of the South Croydon Community Association to formally object to the planning application reference 23/01231/FUL, which proposes to convert the existing detached house at 39 Heathfield Road into a House in Multiple Occupation (HMO) with 11 bedrooms. This application raises several concerns regarding the impact on the local community, infrastructure, and compliance with Croydon Council's planning policies.

- 1. Previous Applications and Consistency This application follows several previous attempts to develop the site, all of which were refused or dismissed on appeal due to the site's limitations and unsuitability for high-density development. The Council's consistent stance should remain, and the current proposal should be rejected.
- 2. Impact on Community Facilities The property was previously a medical facility, serving as a community asset. An outdated 2018 NHS letter indicated no current need, but given Croydon's population growth and changing demographics, a renewed assessment is necessary. The lack of a recent marketing exercise or updated needs assessment means this application fails to comply with Policy DM19.1 of the Croydon Local Plan.
- 3. Residential Amenity and Overcrowding An 11-bedroom HMO would increase noise, disturbance, and anti-social behavior, negatively impacting existing residents. The high density would strain local services, parking, and waste management, violating the Croydon Local Plan's requirements for respecting living conditions.
- **4. Insufficient Parking and Traffic Impact** The proposal lacks adequate off-street parking, increasing stress on Heathfield Road and surrounding streets, which are already under pressure. This contravenes Policies T6 and DM29 of the Croydon Local Plan.
- 5. Lack of Consideration for Sustainability and Health The proposal ignores critical sustainability measures mandated by the Croydon Local Plan 2018, such as energy efficiency, water conservation, and sustainable materials. Additionally, using basement and loft spaces for accommodation raises serious health concerns due

to issues like dampness, mould, inadequate insulation, and poor ventilation. These conditions conflict with providing high-quality, sustainable housing.

- **6. Saturation of HMOs in the Area** Despite claims, there are at least five other HMOs in close proximity with different postcodes due to the street layout. This ignores the true potential for over-density, as existing HMOs already meet current demand.
- 7. Market Oversupply A local landlord with 35 years of experience managing HMOs reports diminishing demand and market saturation with similar vacant properties. Approving this application would not meet actual demand but misrepresent the housing landscape.

Conclusion

The proposed 11-bedroom HMO at 39 Heathfield Road constitutes overdevelopment, negatively impacts the character of the area, fails to replace a valuable community facility, lacks adequate parking and waste management provisions, and does not address sustainability and health concerns. Additionally, changing population needs warrant a new assessment. I urge the planning committee to refuse this application in line with Croydon Council's policies and previous decisions.

Thank you for considering these objections on behalf of the South Croydon Community Association.

Sincerely,

Dr Jose Sanchez Loureda

Chair, South Croydon Community Association

7th July 2024