

Christopher Grace – Case Officer
Development Management
6th Floor
Bernard Weatherill House
8 Mint Walk
Croydon
CR0 1EA

**Monks Orchard
Residents' Association
Planning**

8th March 2023

Emails: dmcomments@croydon.gov.uk
development.management@croydon.gov.uk
christopher.grace@croydon.gov.uk

Emails: planning@mo-ra.co
chairman@mo-ra.co
hello@mo-ra.co

Reference: 23/00594/FUL
Application Received: Mon 13 Feb 2023
Application Validated: Mon 13 Feb 2023
Address: 159 - 161 The Glade Croydon CR0 7QR
Proposal: Demolition of two existing bungalows and associated garages to create a combined site of 950 sqm which is remodelled to deliver 5 family homes with associated parking. The dwellings consist of four semi-detached properties facing The Glade and one detached property on Brookside Way. All family homes have rear gardens and cycle storage. Two additional cycle storage spaces are proposed for visitor parking.
Status: Awaiting decision
Consultation Expiry: Sun 19 Mar 2023
Determination: Mon 10 Apr 2023
Case Officer: Christopher Grace

Dear Mr Grace – Case Officer,

Please accept this letter as a formal objection to **Application Ref: 23/00594/FUL** for Demolition of two existing bungalows and associated garages to create a combined site of 950 sqm which is remodelled to deliver **5** family homes with associated parking, consisting of **four semi-detached** properties facing **The Glade** and **one detached** property on **Brookside Way**. All family homes to have rear gardens and cycle storage with two additional cycle storage spaces for visitor parking.

Design and Access Statement Street Scene facing The Glade:



Design and Access Statement Street Scene facing Brookside Way



1 The Proposal's Parameters:

159-161 The Glade		App Ref: 23/00594/FUL														
Site Area	950 sq.m.	Supplied Drawings				Floor Area Ratio	0.64		Post Code	CR0 7QR						
App Form	0.095 ha	Bedrooms Density	200.00 b/ha		Plot Area Ratio	1.05		Area	0.410033 ha							
Footprint	1000 sq.m.	Residential Density	347.37 bs/ha					Persons	17 (persons)							
Units	5	Residential Density	305.26 hr/ha		PTAL	2011	1.33	(1b)	Dwellings	12 (Units)						
		Housing Density	52.63 U/ha		PTAL	2021	1.33	(1b)	Housing Density (U/ha)	29.27						
		Average Occupancy	6.60 bs/unit		PTAL	2031	1.33	(1b)	Residential Density (bs/h)	41.46						
Unit	Type	Floor	Bedrooms (b)	Bed Spaces (bs)	Habitable Rooms (hr)	GIA (Offered)	GIA (Required)	In-Built Storage (Offered)	In-Built Storage (Required)	Amenity Space (Offered) (Note 2)	Amenity Space (Required)	Probable Adults	Probable Children	Play Space (Required)		
Unit 1	"A" M4(2)	Ground	0	0	1	124.3	70.00	2.0	3.0	52.38	7	2	5	50		
		First	3	5	3			0.0								
		Second	1	2	2			Note 1								
Sub Totals			4	7	6	124.3	70.00	2.0	3.0	52.38	7	2	5	50		
Unit 2	"A" M4(2)	Ground	0	0	1	124.3	99.00	2.0	3.0	53.55	7	2	5	50		
		First	3	5	3			0.0								
		Second	1	2	2			Note 1								
Sub Totals			4	7	6	124.3	99.00	2	3.0	53.55	7	2	5	50		
Unit 3	"A" M4(2)	Ground	0	0	1	124.3	99.00	2.0	3.0	54.00	7	2	5	50		
		First	3	5	3			0.0								
		Second	1	2	2			Note 1								
Sub Totals			4	7	6	124.3	99.00	2	3.0	54.00	7	2	5	50		
Unit 4	"A" M4(2)	Ground	0	0	1	124.3	99.00	2.0	3.0	53.30	7	2	5	50		
		First	3	5	3			0.0								
		Second	1	2	2			Note 1								
Sub Totals			4	7	6	124.3	99.00	2	3.0	53.30	7	2	5	50		
Unit 5	"B" M4(2)	Ground	0	0	1	111.2	70.00	1.7	2.5	74.97	5	2	3	30		
		First	2	3	2			Note 1								
		Second	1	2	2			2.4								
Sub Total			3	5	5	111.2	70.00	4.1	2.5	74.97	5	2	3	30		
Grand Total			19	33	29	608.4	437	12.1	14.5	288.2	33	10	23	230		
<small>Note 1: It is not clear whether the second floor Utility Area contributes to In-Built Storage requirement. Note 2: As roughly scaled off the Ground Floor Plans magnified @ 110% (As not mentioned on Plans or Design & Access Statement)</small>																

2 Initial Comments and Observations

2.1 We only object when proposals do not comply with current adopted or emerging planning policies designed to minimise overdevelopment and retain the local character within acceptable constraints, or where policies are vaguely specified and subject to varying interpretations.

2.2 We have structured this objection on grounds of non-compliance to agreed adopted Planning Policies and guidance from:

- The **NPPF** (June/July 2021)
- The Department for Levelling Up, Housing and Communities (LUHC) **National Model Design Codes and Guidance** Documents published (January 2021 & June 2021);
- The **London Plan** (March 2021)
- The **Croydon Local Plan** (2018)
- The Draft **Revised Croydon Local Plan** (November 2021 Not yet adopted)



2.3 The **Design & Access Statement** at Page 31 states:

2.3.1 ***“THE PROPOSAL - DENSITY***

The combined site area is 950sqm or 0.095 hectares.

The London Plan has removed the previous density matrix and requires each application to be separately evaluated however the matrix remains a reasonable guide in terms of acceptable density.

The matrix indicated a mid-point to PTAL 0-1 zones in suburban areas of between 40-65 units per hectare, and between 150-200 habitable rooms per hectare.

The following density levels are proposed:

<i>Units per hectare</i>	<i>53</i>
<i>Habitable rooms per</i>	<i>210</i>
<i>Bedrooms per hectare</i>	<i>158</i>
<i>Bedspaces per hectare</i>	<i>347</i>

53 Units per hectare are in the middle of the recommended units in the matrix table. We therefore believe that the density for the plot is appropriate for its location and neighbouring properties.

The neighbouring area of postcode CR0 7QR appears to have all similar densities with approximately 153-159 habitable rooms per hectare per 54 Units per hectare.

The proposed habitable bedspaces are marginally higher than the recommended 200 habitable rooms per hectare. This can be explained by the direction to increase building storeys and the desire to provide 4 bedroom family houses.

Our conclusion would be that the density and habitable rooms would be appropriate for the surrounding character and location of the area and would not have detrimental effect on neighbouring properties.”

2.3.2 However, the Floor Plans and proposal Analysis show the Following:

Site Area = 950 sq.m. = 0.095ha.

Number of Units = 5 ∴ Housing Density = 5/0.095 = **52.63u/ha**

Number of Bedrooms = 19 ∴ Bedroom Density = 19/0.095 = **200 (NOT 158)***

Number of Bedspaces = 33 ∴ Residential Density = 33/0.095 = **347.37bs/ha.**

Number of Habitable Rooms = 29 ∴ Residential Density = **305.26hr/ha**

*(*The House Type “A” Floorplans show two bedrooms as “Bedroom 3”).*

2.3.3 The London Plan (2021) has omitted the **Density Matrix** from **Planning Policy** and therefore the **Density Matrix** retains no material weight in terms of Planning Policy for new applications.

2.3.4 There is no material **Guidance** for the management of **Housing** or **Residential Densities** for new developments in either the **London Plan** (2021), the **Croydon Local Plan** (2018) or the **Revised Croydon Local Plan** (2021/23). However, The Department for Levelling Up, Communities & Housing has produced the **National Model Design Code and Guidance** which is referenced from **Para 128 & 129** of the **Revised (2022) NPPF** for **Design Code** determination in the **absence of any guidance in the Local Plans.**

2.3.5 There is inadequate **In-Built Storage capacity** to meet the London Plan Policy H6 Table 3.1 for future occupants for the life of the Development.



2.4 Appearance and Local Character.

2.4.1 The proposed building has an ugly appearance, with no character or defined fenestration of window or doors. In fact the building is presented as a stack of bricks with apertures (holes) where windows and doors should be (*but aren't*).



Type A Houses showing the complete lack of design fenestration with roof form which is which completely out of character with any local dwelling in the Glade or surrounding Area.



Type B House showing the unattractiveness and complete lack of design fenestration or unproportionally (width/height), with roof form which is completely out of character with any local dwelling in the Brookside Way or surrounding Area.

2.4.2 Roof Form & Architectural detailing.

2.4.2.1 Croydon Local Plan (2018) adopted.

6.40 The existing policy review identified a need for a roofscape policy that acknowledges the visual contribution **roof-forms** make and the need to provide guidance on the way in which the transition between new and old developments are addressed. Guidance for **roof-form** (roofscape) has not been included within the National Planning Policy Framework or the Strategic Policy.

DM10.7 To create a high quality-built environment, proposals should demonstrate that:

- The **architectural detailing** will result in a high-quality building and when working with existing buildings, original architectural features such as mouldings, architraves, chimneys or porches that contribute to the architectural character of a building should, where possible, be retained;
- High quality, durable and sustainable materials that respond to the local character in terms of quality, durability, **attractiveness**, sustainability, texture and colour are incorporated;
- Services, utilities, and rainwater goods will be discreetly incorporated within the building envelope⁴²; and
- To ensure the design of **roof-form** positively contributes to the character of the local and wider area; proposals should ensure the design is sympathetic with its local context.

2.4.2.2 The assessment of the proposed building **Types “A” and “B”** falls far short of the **“Good Design”** principles to reflect and respect the **Local Character** including **attractiveness** and the respect of local **“Roof-Forms”** within the locality. We are of the opinion that the proposal with **‘Gabriel’ or ‘Clipped’ Roof Forms** look odd at this location and do **NOT** comply with the predominantly **hipped** roof forms of surrounding properties and therefore is non-compliant to the adopted **Croydon Local Plan** with regard to **Policy DM10.7** and should therefore be **Refused**.

3 Area Type Settings and Design Codes

3.1 The **London Plan Policy D3** - Optimising **site capacity** through the designed approach, require proposals meet **Site Capacity** and reflect the assessment of **Local Design Codes** but give no guidance on how that should be implemented or any methodology to assess local **Area Type** Setting or their **Design Code** parameters.

3.2 Similarly, there is no guidance in either the current adopted **Croydon Local Plan** (2018) or the Revised draft **Croydon Local Plan** (2921/23).

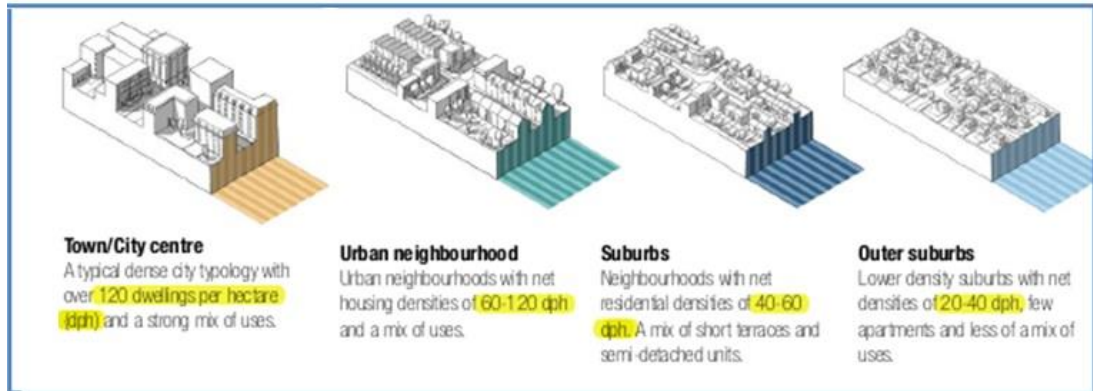
3.3 However, in reference to **Area Type Settings** and **Design Codes**, the **NPPF (2021) Para 128 & 129** state that:

*“... 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 codes.**”*



3.4 **National Area Type & Design Codes.**

3.4.1 The **National Model Design Code & Guidance** (June 2021) Part 1, 2B Coding Plan Figure 10, page 14 provides Examples of **Area Types** and their appropriate **Housing Densities**.



Example Area Type Settings and appropriate Housing Density ranges as Guidance for local Design Code Assessments

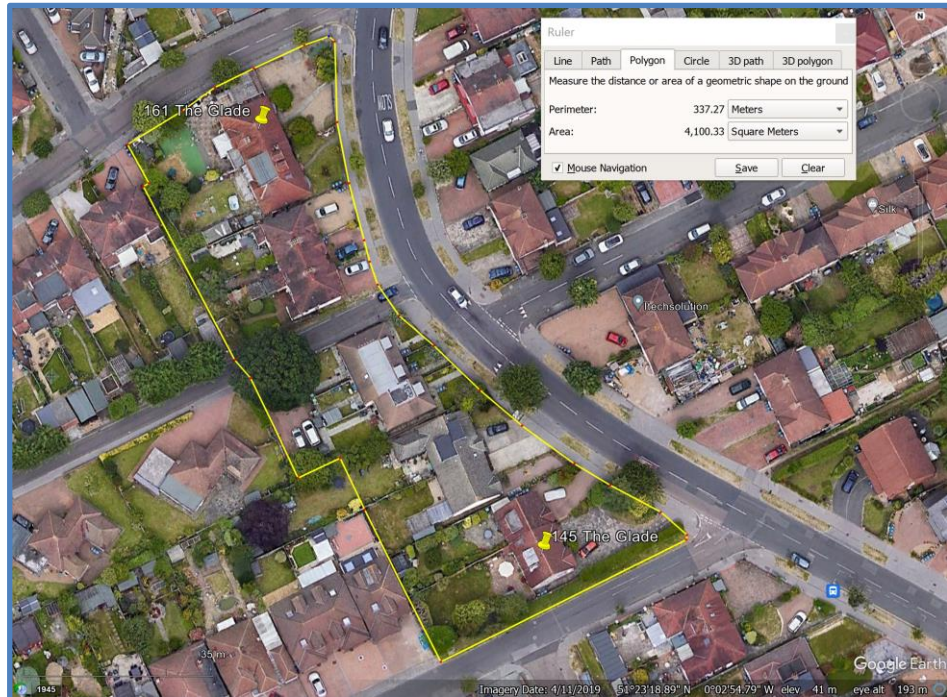
3.4.2 We have been compiling **Local Area Type Settings** for recent Application proposals and the **Shirley Wards** and **Post Codes** within **Shirley** have all been either **<Outer Suburban** or **Outer Suburban Area Type Settings** as defined by the **National Model Design Code & Guidance**. This is a completely different assessment to the **Shirley 'Place' definition** of Shirley in the **Croydon Local Plan** which considers **Shirley** to be **Suburban/Urban**.

Location	Area (ha)	Population (Nat. Ave)	Dwellings (Units) (Nat. Ave)	Residential Density (bs/ha)	Housing Density (Units/ha)	"Setting" for Design Code Residential Density (bs/ha)	"Setting" for Design Code Housing Density (U/ha)	Occupancy Ratio (Nat. Ave) (2.36)
Shirley North	328.00	15,406	6,528	46.97	19.90	<Outer Suburban	<Outer Suburban	2.36
Shirley South	384.40	10,619	4,500	27.62	11.71	<Outer Suburban	<Outer Suburban	2.36
All Shirley	712.40	26,025	11,028	36.53	15.48	<Outer Suburban	<Outer Suburban	2.36
MORA Area	178.26	9,166	3,884	51.42	21.79	Outer Suburban	Outer Suburban	2.36
Post Code CRO 8S(*)	16.95	627	237	36.99	13.98	<Outer Suburban	<Outer Suburban	2.65
Post Code CRO 8T(*)	11.82	644	246	54.48	20.81	Outer Suburban	Outer Suburban	2.62
Post Code CRO 7PL	1.73	47	19	27.17	10.98	<Outer Suburban	<Outer Suburban	2.47
Post Code CRO 7QD	1.51	68	28	45.03	18.54	<Outer Suburban	<Outer Suburban	2.43
Post Code CRO 7PB	1.26	40	25	31.75	19.84	<Outer Suburban	<Outer Suburban	1.60
Post Code CRO 8UB	1.70	71	30	41.89	17.70	<Outer Suburban	<Outer Suburban	2.37
Post Code CRO 7NA	1.97	36	18	18.27	9.14	<Outer Suburban	<Outer Suburban	2.00
Post Code CRO 7NE	0.83	26	11	31.33	13.25	<Outer Suburban	<Outer Suburban	2.36
Post Code CRO 7RL	1.40	60	24	42.72	17.09	<Outer Suburban	<Outer Suburban	2.50
Post Code CRO 7PX	0.96	21	11	21.81	11.43	<Outer Suburban	<Outer Suburban	1.91
Post Code CRO 7QR	0.41	17	12	41.46	29.27	<Outer Suburban	Outer Suburban	1.42
Shirley Oaks Village ^{Note 2}	19.12	1,286	545	67.26	28.50	Outer Suburban	Outer Suburban	2.36
Shirley "Place" ^{Note 1} (Estimate)	770.00	32,995	13,981	42.85	18.16	<Outer Suburban	<Outer Suburban	2.36
Average	143.10	5,715	2,419	39.15	17.50	<Outer Suburban	<Outer Suburban	2.31

3.4.3 This **National** guidance should therefore be used to assess local development proposals as required by the **NPPF** para 129 as there is no guidance in either the **London Plan** or the **Croydon Local Plans** to define local **Design Codes** or **Area Type Settings** and thus calculate appropriate **Site Capacities** or **Densities** for **Sustainable developments** with adequate supporting infrastructure.

3.5 Local Area Type Assessment

3.5.1 The **Area Type** Setting is calculated based on data over a known Area with the number of dwellings and population Densities. The Local Area Assessment for this proposal at **161 The Glade** is assumed to be the Local **Post Code (CR0 7QR)** which includes dwellings from **145 to 161 The Glade**.¹ The Occupancy of the Post Code is found from the Post Code details ² and the Area (4,100,33sq.m.) found by use of the polygon tool on Google Earth.



Approximate Area of Post Code CR0 7QR as measured from Google Earth Image

Parameters of Post Code 'CR0 7QR' Design Code				
Area Design Code Parameter	Input Parameters			Constrains
(These parameters auto calc Design Code)				
Post Code	CR0 7QR			Ward Shirley North
Area of Post Code (ha)	0.4100	hectares		Flood Risks 30yr Surface
Area of Post Code (Sq.m)	4100.33	sq.m.		Gas Low Pressure
Number of Dwellings (Units) (*)	12	Units		Water N/A
Number of Occupants (Persons)	17	Persons		Sewage N/A
Occupancy	1.42	Person/dwelling		HASL (m) Average 42m
Post Code Housing Density	29.27	Units/ha		Building Line Set-Back Various
Post Code Residential Density	41.46	Bedspaces/ha		Set-back Guidance 3 to 6m rec.
Area Type (National Model Design Code)	Outer Suburban	Setting		
(*) Last updated on 22 February 2023				
Design Code Parameters				
Area Type Setting (NMDC)	Outer Suburban	Min 20	Max 40	Units/ha Range
Equivalent ¹ Residential Density (Persons/ha)	<Outer Suburban	0.00	47.20	Persons/ha Range
¹ Based on National Occupancy (2021) persons/Unit				
		Outer Suburban U/ha	<Outer Suburban bs/ha	
PTAL (now)	1.33	42.17	99.51	Limits for PTAL
PTAL (forecast 2031)	1.33	42.17	99.51	Limits for PTAL
Gentle Intensification (Limits in U/ha & bedspaces/ha)		26.67	62.93	Limits 'Gentle' Intensification
Moderate Intensification (Limits in U/ha & bedspaces/ha)		33.33	78.66	Limits 'Moderate' Intensification
Focussed Intensification (Limits in U/ha & bedspaces/ha)		40.00	94.40	Limits 'Focussed' Intensification

Post Code CR0 7QR Design Code parameters

¹ <https://www.gov.uk/government/organisations/valuation-office-agency>

² <https://www.postcodearea.co.uk/>



3.6

Application Design Code Parameters

Application Design Code Details			
Application Ref:	23/00594/FUL		
Address:	161 The Glade		
PostCode:	CR0 7QR		
LPA Consultation Close	19/03/23		
Application Parameters			
Site Area (ha)	0.0950	ha	
Site Area (sq.m.)	950.00	sq.m.	
Units (Dwellings)	5.00	Units	
Bedrooms	19.00	Bedrooms	
Bedspaces	33.00	Persons	
Housing Density	52.63	Units/ha	
Residential Density	347.37	bs/ha	
Occupancy	6.60	bs/unit	
Gross Internal Area (GIA) offered	608.40	sq.m.	
Floor Area Ratio	0.64	#	
		Min	Max
Area Type Setting (Units/ha)	Suburban	40.00	60.00
Area Type Setting (Bedspaces/ha)	Central	283.20	<283.2
		U/ha	bs/ha
PTAL (Current)	1.33	42.17	99.51
PTAL (Forecast)	1.33	42.17	99.51
PTAL Required	7.63		347.37

3.7

Difference between the Post Code Design Code and Application proposal Design Code parameters.

Difference Between Post Code (CR0 7QR) Design Code & Application Proposal			
Post Code Housing Density (Units/ha)	29.27	Area Type Setting	Outer Suburban
Application Housing Density (Units/ha)	52.63	Area Type Setting	Suburban
Difference	23.36	#	
Percentage Difference (%)	79.81	%	
Percentage Increase (%)	79.81	%	
Post Code Residential Density (bs/ha)	41.46	Area Type Setting	<Outer Suburban
Application Residential Density (bs/ha)	347.37	Area Type Setting	Central
Difference	305.91	#	
Percentage Difference (%)	737.84	%	
Percentage Increase (%)	737.84	%	
PTAL Currently Available	1.33	<Outer Suburban	
PTAL Required	7.63	Central	

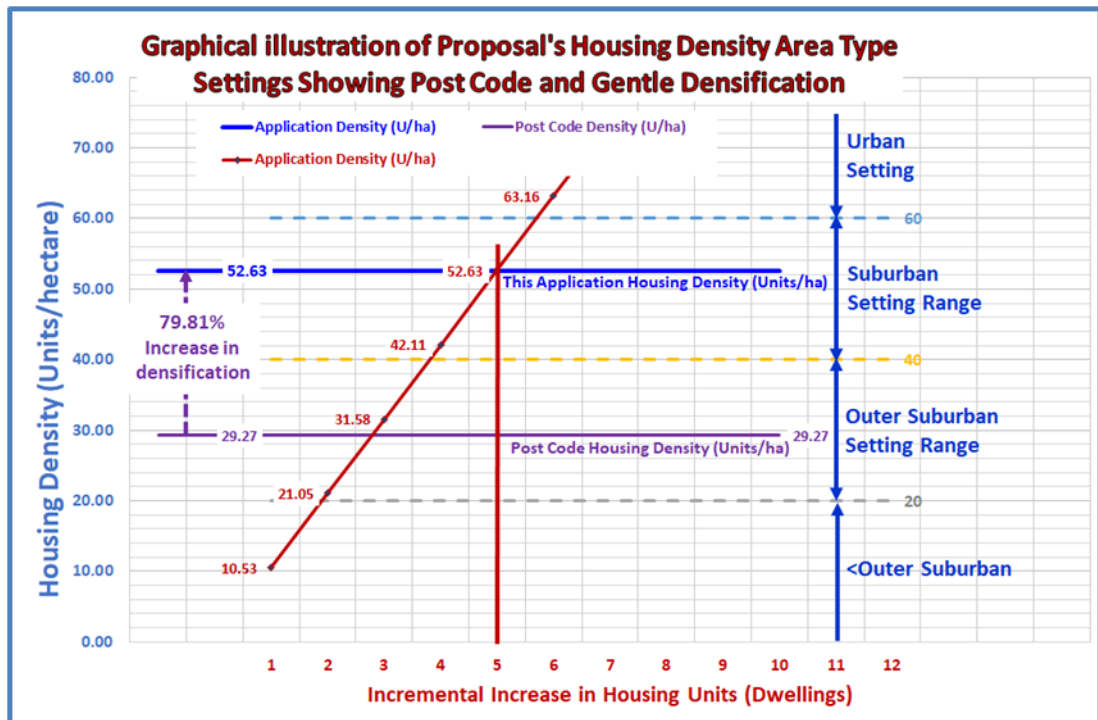
3.8

The assessment above clearly shows that the proposal exceeds the **Area Type Setting Housing Density** of **Outer Suburban Area Type Setting** for the **Post Code** Area of the locality from **29.27Units/ha** to **52.63Units/ha**, an increase of **79.81%** to a higher density **Suburban Area Type Setting**.

3.8.1

The increase in occupancy as measured in **Residential Density** terms of bedspaces per hectare increases from **41.46persons/ha** to **347.37persons/ha**, a **737%** increase, which would be more appropriate for a **Central** Area Type Setting. It should be noted that such an increase would be **completely unacceptable** for an **<Outer Suburban Area Type Setting** and require a commensurate improvement in **supporting infrastructure**, which according to the infrastructure delivery plan³ would not be forthcoming over the life of the revised **Local Plan**.

³ <https://www.croydon.gov.uk/sites/default/files/2022-01/infrastructure-delivery-plan-2021.pdf>



Graphical Illustration of Proposal's Housing Density v Number of Dwellings for Site Area of 0.095ha at 161 The Glade compared to the Locality POST CODE (CR0 7QR)

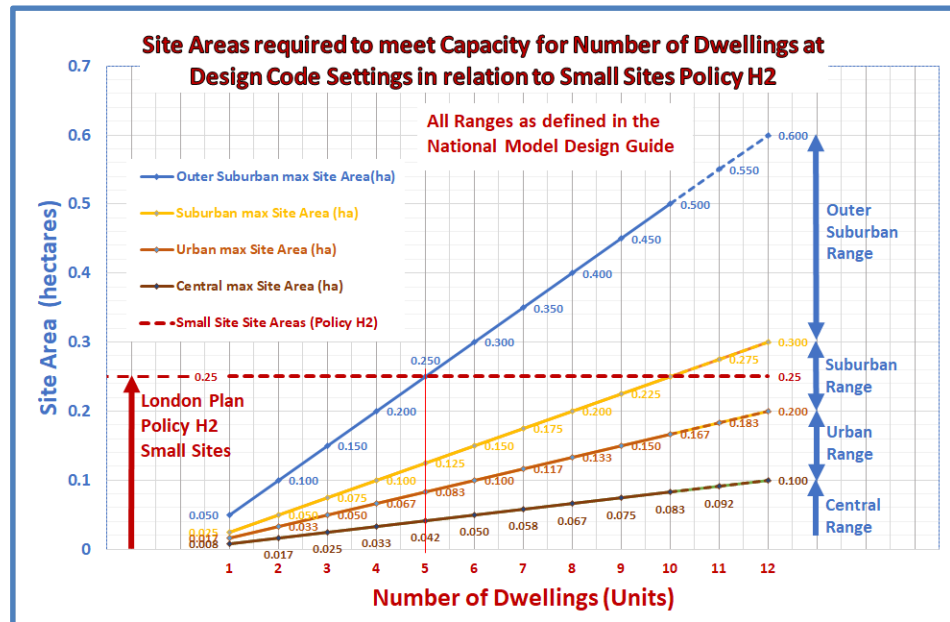
4 Site Capacity.

4.1 London Plan Policy D3 – Optimising Site Capacity through the Design-Led Approach

3.3.2 A *design-led approach* to optimising site capacity should be based on an evaluation of the *site's attributes*, its surrounding context and its *capacity for growth* to determine the appropriate form of development for that site.

4.2 The attributes of a development site are the **Area Type** Setting of the locality and the **Site Area** available for the proposed development. These are fundamental to the **Capacity** of the Site for development. The proposed Site has an Area of **950 sq.m. = 0.095ha** and the Locality as defined by the local **Post Code CR0 7QR** is **29.27Units/ha = Outer Suburban**.

4.3 The graphical illustration below shows that the **Outer Suburban Area Type** Setting for **5** dwellings requires a **Site Area** between **0.125ha** and **0.25ha** when the proposal's **Site Area** is **0.095ha** i.e., **deficient** by a minimum of **0.03ha** and maximum of **0.155ha**. Therefore, a proposed development of **5** dwellings on a **Site Area** of **0.095ha** in an **Outer Suburban Area Type** Setting exceeds the available **Site Capacity** and is **Non-Compliant** to the **London Plan Policy D3 - Optimising Site Capacity through the Design-Led Approach**.



The Site Capacities for Area Type Settings as defined by the National Model Design Code & Guidance

4.4 Plot Ratio or Floor Area Ratio (FAR) (GIA/Site Area)

4.4.1 The National Model Design Code Guidance at “Built Form” Para 52 ii (page 20) states:

ii Plot ratio: Calculated by dividing the gross floor area of the building by the area of the plot, plot ratios along with site coverage should be used alongside good urban design principles to regulate the density of mixed-use and non-residential uses (example below) See B.1.i Density

- Town Centres: Plot Ratio >2
- Urban Neighbourhoods: Plot Ratio >1
- Suburbs: Plot Ratio <0.5

4.4.2 The proposed development has a site area of 950sq.m. and the offered Gross Internal Area of 608.4sq.m. equates to a Floor Area Ratio of $608.4/950 = 0.6362$ (≈ 0.64). This is greater than (>) 0.5 and exceeds the recommended Floor Area Ratio for a Suburban Area Type Setting, an increase of an increase of 27.24%.

4.4.3 The proposed Development therefore exceeds the recommended National Model Design Code & Guidance Floor Area Ratio for a Suburban Area Type

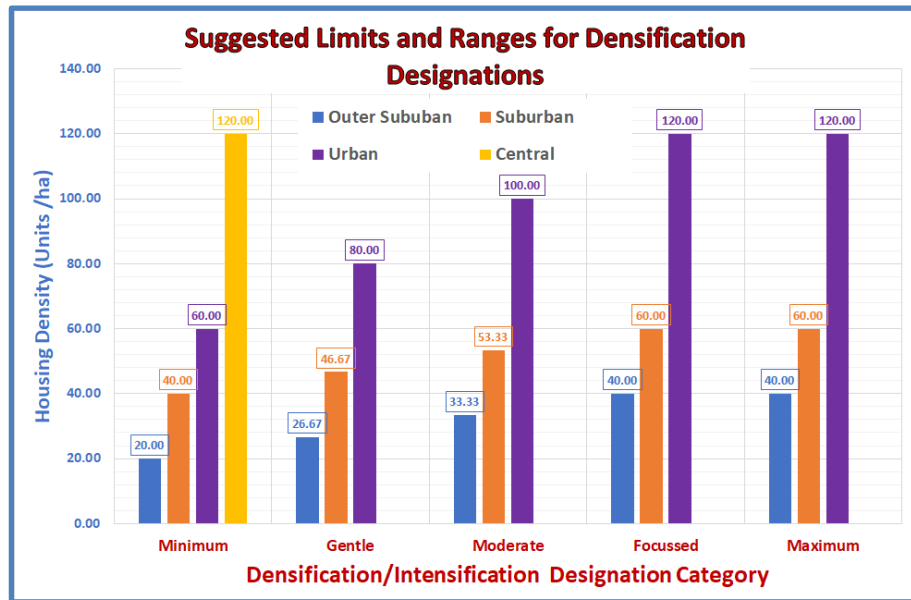
5 Growth, Densification & Intensification.x

5.1 Croydon Local Plan (2018) ‘Growth’ Policies

5.1.1 The Croydon Local Plan (2018) ‘Growth’ Policies, as defined in Table 6.4, ‘purports’ to describe “Growth” by either “Redevelopment” or “Evolution” by “Regeneration”, but gives no definition of the acceptable magnitude of ‘growth’ in terms of ‘Site Capacity’, ‘Local and future Infrastructure’ or ‘Public Transport Accessibility’ therefore, the Policy is ‘unenforceable’ and ‘undeliverable’ as it has no measurable methodology, is imprecise, indeterminate and devoid of any Policy definition other than guidance to “seek to achieve” a minimum height of 3 storeys at specific locations.



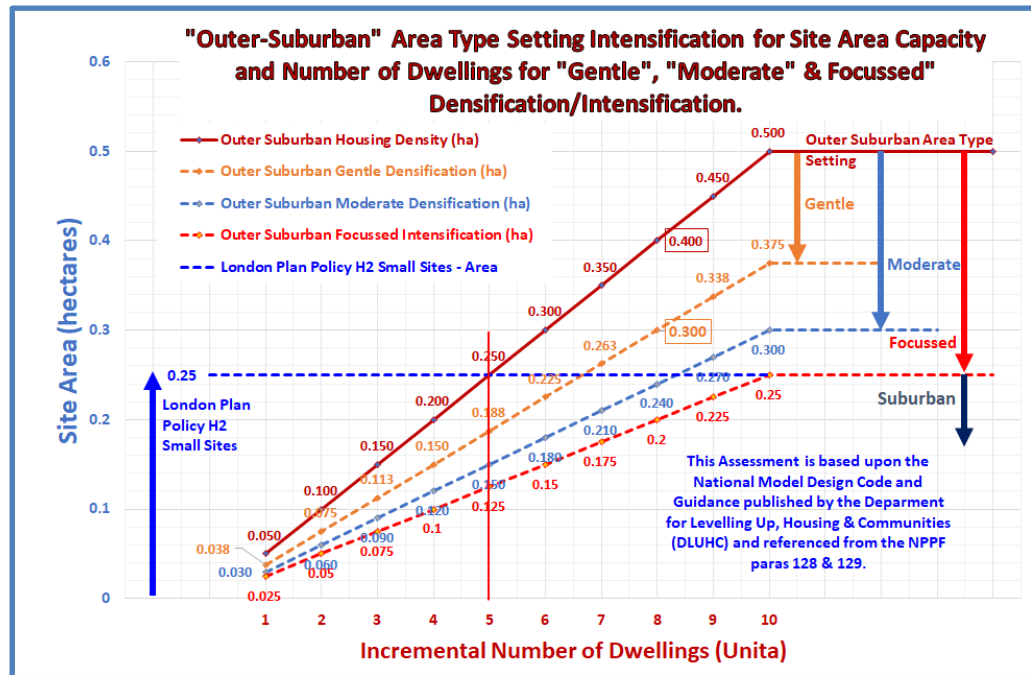
- 5.1.2 The Revised **Croydon Plan (2021)** Policy Fails to meet the guidance required in **NPPF (2019-21) Section 3. Plan-making** and specifically **NPPF** para 16 d) or Para 35, a) Positively prepared, b) Justified, c) Effective and d) **Consistent with National Policy** or, more importantly, the **Statutory requirement** to ensure **‘Sustainable Developments’**. In fact, the Policy is quite **“meaningless”** and **“nugatory”** but subject to the **“professional”** prejudicial judgment of Case Officers without any objective justification.
- 5.2 The **Revised Croydon Local Plan** at Policy **SP1.0C** states:
- SP1.0C** There are residential areas where the characteristics and infrastructure provision have led to the identification of potential for sustainable housing growth and renewal.
- a) Areas of **Focused Intensification** are areas where a step change of character to higher density forms of development around transport nodes and existing services will take place.
 - b) **Moderate Intensification** – are areas where density will be increased, whilst respecting existing character, in locations where access to local transport and services is good.
 - c) Evolution and **gentle densification** will be supported across all other residential areas.
- 5.2.1 **161 The Glade** is not designated as an appropriate area for **“Focussed”** or **“Moderate”** densification on the **Policies MAP**. It is therefore appropriate for evolution by **“Gentle” densification as stated at SP1.0C para c)**. However, the **Revised Croydon Local Plan** fails to *define* exactly what is meant by **“Gentle” densification**.
- 5.2.2 The policy **SP1.0C** does not quantify exactly what **“Gentle” densification** actually means. Therefore, the ambiguous subjective term **“Gentle Intensification”** is literally meaningless in terms of Policy assessment or definition and is NOT quantified or qualified elsewhere in the **Revised Local Plan (i.e., DM10.11a - d)**.
- 5.3 **Assessment for Evolution & Regeneration**
- 5.3.1 As the **National Model Design Code Area Types** rely on the **available supporting infrastructure**, unless there are programs of **‘improved infrastructure’** over the life of the plan, any **intensification** within an **Area Type or Setting** relies on that **existing Supporting Infrastructure** and therefore the **Design Code Density densification** should **remain within** the **Setting** or **Area Type “Ranges”**, in order for adequate **“sustainable” supporting infrastructure**.
- 5.3.2 We have shown in the **Graphical Illustration** below, an **incremental** increase in **Design Code Density** of **⅓ (33%) “Gentle”** & **⅔ (66%) “Moderate”** between Settings for **“Outer Suburban”, “Suburban”** and **“Urban”** for **“Gentle”, “Moderate” and (100%) for “Focussed”** Intensification to the maximum of the setting as an example. This is our interpretation of the **Local Plan Policy** as determined by logical assessment and analysis, to ensure **sustainability** of the developments as there is no **‘meaningful’ guidance** in the **Croydon Plan**, the **Revised Croydon Local Plan** or the **London Plan**.



Suggested ranges for Gentle Moderate and Focussed intensification to remain within infrastructure limitations of the Setting and Area Type

- 5.3.3 There is no “Gentle”, “Moderate”, “Focussed” or “Maximum” Intensification or Intensification for a **Central Area Type** Setting as the only ‘determinant’ factor for “Central” is the requirement to meet the **Internal Space Standards** as defined at **London Plan Policy D6 - Housing Quality and Standards Table 3.1. Minimum Space Standards for New Dwellings.**
- 5.3.4 It should be clearly recognised that **Shirley** has **NO** prospect of **infrastructure or Public Transport improvement** over the life of the plan as stated in the **LB of Croydon Infrastructure Delivery Plan.** ⁴ It is suggested that **poor infrastructure** would require the **Design Code Density** to **tend toward the lower value of density**, and **higher infrastructure** provision **tend toward the higher value of density** of the **Setting Range**. Similarly, the **Intensification** or **densification** should follow the same fundamental Principles.
- 5.3.5 It is presumed that the **Area Type**, as defined by the **National Model Design Code & Guidance**, at the **low value of the Density Range** would be of **Lower PTAL** and the **Higher of the Density Range**, at the **Higher PTAL**. Assuming this to be the objective, the distribution over the **lower and higher Ranges** should incrementally increase approximately **linearly** from **PTAL Zero** through to a **PTAL of 6** as defined by **TfL**.
- 5.3.6 **Using the same principles for Outer Suburban Area Type Settings** as other Area Type Settings, the “Gentle” Intensification for 161 The Glade, with a **PTAL of 1b =1.33** and a “Site Capacity” limitation of **0.095ha**, should **NOT** exceed a **Post Code Housing Density** for an Area Type **Outer Suburban** of **>≈26.67Units/ha Gentle Intensification** i.e., $20 + (40-20)/3$, but it actually reaches $5/0.095 = 52.63u/ha$, which is within a ‘**Suburban**’ Area Type Setting.

⁴ <https://www.croydon.gov.uk/sites/default/files/2022-01/infrastructure-delivery-plan-2021.pdf>



The assessment of Croydon Plan densification/Intensification Policies for Outer Suburban Area Type Setting

5.3.7 These increases above the **“Gentle” densification** suggested at **26.67U/ha** are to keep within the **Area Type** boundary range and **infrastructure capacity** of the **‘Outer Suburban’ Area Type Settings** and **PTAL at Level 1b=1.33** currently available and therefore the increases are **inappropriate** for the locality. The level of increased densification from **29.27u/ha to 52.63u/ha** is a **79.81% increase** and **additionally an 110.84% increase** [i.e., $((26.67-56.23)/26.67)*100$] above that appropriate for the **26.67U/ha for Outer Suburban “Gentle” densification**, as it is **NOT supported by the local infrastructure**. There is no planned increase in **infrastructure** provision for the **Shirley North Ward** over the life of the Plan, therefore this proposal is **inappropriate** and should be **Refused**.

5.3.8 If the Case Offer is minded to approve the application, we respectfully request that a full and detail **Justification** be provided setting out why the **National Model Design Code & Guidance** does **NOT** apply to **Croydon LPA** and why the densification is allowed to result in a change of **Area Type** from **Outer Suburban** to **Suburban** contrary to the **London Plan Policy D3 – Optimising Site Capacity through the Design-Led Approach**.

6 London Plan Policy H2 – Small Sites

6.1 London Plan Policy H2 - Small Sites para 4.2.5 States:

*“The small sites target represents a **small amount** of the potential for **intensification** in existing **residential areas**, particularly in **Outer London**, therefore, they should be treated as **minimums**. To proactively increase housing provision on small sites through **‘incremental’** development, Boroughs are encouraged to **prepare area-wide housing Design Codes**, in particular, for the following forms of development: **Residential Conversions, Redevelopments, extensions of houses and/or ancillary residential buildings.**”*

6.2. **The London Plan Policy 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 station⁵ or town centre⁶ boundary ...”

6.2.1 **161 The Glade** has a **PTAL of 1b (≅1.33)** and is approximately **680m (LOS)** as measured on Google Earth to the Croydon **Arena Tram** or **District Centre** and greater than **800m (LOS)** from any **District Centre**. However, the actual physical walking distance from **161 The Glade** to the **Arena Tram Stop** via **Brookside Way, Bywood Avenue** and the pathway adjacent to **World of Golf** to the **Arena Station** is **≈907.50m** (i.e., >800m) as measured on **Google Earth** and as such the location at **161 The Glade** is **inappropriate** for **incremental intensification**.



Google Earth Path from 161 The Glade to the Arena Tram Station.

7 Residential Density and Public Transport Accessibility

7.1 The proposal has in total **33 bed** spaces on a **Site Area 0.095ha** which equates to a **Residential Density** of $33/0.095 = 347.368 \approx \mathbf{347.37bs/ha}$ or **29 habitable Rooms** on a Site of **0.095ha = 305.26hr/ha**.

7.2 **Habitable Rooms** is an inappropriate measure for **Residential Density** as a habitable Room by definition does not require any services, but it is people that require services and **Public Transport Accessibility** etc. Therefore, the number of **Habitable Rooms** as a defining measure of **Residential** requirement seems an illogical parameter for determination of acceptability.

⁵ Tube, rail, DLR or tram station.

⁶ District, major, metropolitan and international town centres.

- 7.3 The omission of the **Density Matrix** from the **London Plan** leaves a void in the assessment of **Residential Relationship** to **Public Transport Accessibility**. It is therefore appropriate to define a relationship between **Residential Density** and **PTAL** availability.
- 7.4 As **Public Transport Accessibility Level** is required to service the public over the **Area Type Ranges** from **Outer Suburban** to the **Central**, we have assumed a similar linear incremental increase over the range **Outer Suburban** (min) at **Zero PTAL** to **Central** (min) at **PTAL 6**.
- 7.5 The **TfL WebCAT** returns **PTAL 1b** for **161 The Glade** and **PTAL 1b** for forecast up to **2031**. In numerical form for evaluation, I have assumed **1a** and **1b** are on a linear extrapolation from the stated range of **Zero to 6**. Therefore, **PTAL1a** = $2/3 = 0.66$ & **PTAL 1b** = $2*2/3 = 1.33$, thus assuming PTAL at 161 The Glade to be **1b** $\equiv 1.33$.
- 7.6 As the **National Model Design Code & Guidance** is based on **National Guidance** it is reasonable to convert the **National Area Type Setting** from **Housing Density** (Units/ha) to **National Residential Density** (Persons/ha) and this can be accomplished using a **National** average for **Unit Occupancy** as defined by the NOS or Statista ⁷ The latest value of **National Dwelling Occupancy** in the UK is **2.36 persons/Dwelling** as of 2021.
- 7.7 Based on the forgoing assumptions the Residential Density of the proposal is **347.37bedspaces/ha**, which places the **Area Type** required at a **“Central” Setting** when the actual **Area Type** Setting as defined by the Local **Post Code** (CR0 7QR) is **Outer Suburban** in accordance with the **National Model Design Code & Guidance**.
- 7.8 Assuming the PTAL incrementally increases linearly over the ranges **Zero to 6** and **Outer Suburban** to **Central** i.e., from **20*2.36 = 47.2 bs/ha** to **120*2.36 = 283.2bs/ha** then the increase in PTAL would follow the function:

$$y = mx + c \text{ where } y = \text{Density}; m = \frac{\delta y}{\delta x}; x = \text{PTAL and } c = y \text{ when } x = 0$$

At the **Post Code** level of **PTAL 1.33** the **Residential Density** should be roughly:

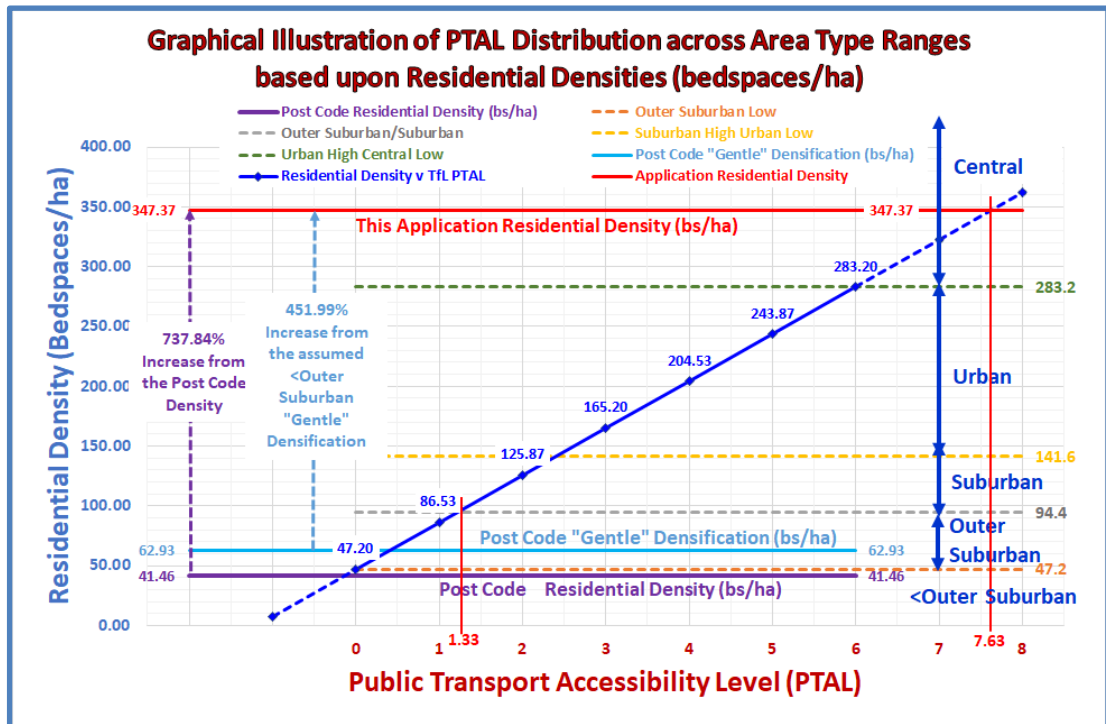
$$y = \left(\frac{120*2.36 - 20*2.36}{6} \right) * 1.33 + (20 * 2.36) = 39.33 * 1.33 + 47.2 = 99.5089$$

y Residential Density = 99.51bedspace/ha

At the Application **Residential Density** of **347.37bs/ha**

$$347.37 = 39.33 * x + 47.2 \quad \therefore x = \frac{347.37 - 47.2}{39.33} = 7.632 = \text{PTAL} \approx 7.63$$

⁷ <https://www.statista.com/statistics/295551/average-household-size-in-the-uk/>



Residential Density in bedspaces/ha v Public Transport Accessibility Level for Post Code Area Type & Proposal.

- 7.9 It is clear from this analysis that the **Public Transport Accessibility Level (PTAL)** available at **161 The Glade** would **NOT** be adequate to support the **Residential Density** and number of occupants resultant on this proposed development as the **Residential Density** at **347.37bedspaces/ha** is more appropriate to a **Central Area Type Setting** which would require a supporting **PTAL of 7.63**.
- 7.10 It is understood that redevelopment at this location could accept **“Gentle”** **Densification** as otherwise the redevelopment is just replacement. However, an increase in **Housing Density** of **79.81%** from **29.27Units/ha** to **52.63Units/ha** from **Outer Suburban Area Type** to **Suburban Area Type** and an increase in **Residential Density** of **737.84%**, an intensification from an **Outer Suburban Area Type Setting**, through **Suburban** and **Urban** to a **Central Area Type Setting** cannot by any reasonable interpretation, be considered **“Gentle”** densification.
- 7.11 We therefore urge the Case Office to Refuse this Application proposal on grounds of overdevelopment and non-compliance to London Plan Policies D2, D3, D4 and D6 and the Guidance provided in the DLUHC National Model Design Code & Guidance referenced from para 129 of the NPPF.

8 Parking

- 8.1 The Croydon Plan Residential Parking for **PTAL 1b** at Table 10.1 states:
1 space per Unit for 1 & 2-Bedroom Dwellings and
1.5 spaces per Unit for 3 or more Bedroom dwellings
For this proposal, the parking provision should ∴ be **5 parking spaces**.
Electric Vehicle Charging Points required = 1 (20%)
- 8.2 The London Plan Residential Parking for **Outer London PTA 1b** at Table 10.3 states:
1.5 spaces per Unit for 1- & 2-Bedroom Dwellings and
1.5 spaces per Unit for 3 or more Bedroom dwellings
For this proposal, the parking provision should ∴ be 7.5 parking spaces when only 5 are provided.
There is no specified EVCP requirement in the London Plan

9 Refuse & Recycling

9.1 Policy DM13: Refuse and recycling

DM13.1 To ensure that the location and design of refuse and recycling facilities are treated as an integral element of the overall design, the Council will require developments to:

- a. Sensitively integrate refuse and recycling facilities within the building envelope, or, in conversions, where that is not possible, integrate within the landscape covered facilities that are located behind the building line where they will not be visually intrusive or compromise the provision of shared amenity space;
- b. Ensure facilities are visually screened;
- c. Provide adequate space for the temporary storage of waste (including bulky waste) materials generated by the development; and
- d. Provide layouts that ensure facilities are safe, conveniently located and easily accessible by occupants, operatives and their vehicles.

DM13.2 To ensure existing and future waste can be sustainably and efficiently managed the Council will require a waste management plan for major developments and for developments that are likely to generate large amounts of waste.

- 9.2 The **Refuse & Recycling** collection point is on the **front forecourt of Unit 1** but there is no **Refuse or Recycling Storage** located behind the **Building Line** for each individual dwelling. The proposal is therefore non-compliant to **Croydon Plan Policy DM13.1 a) or b)**.

10 Sustainability and Housing Need

10.1 NPPF Para 7 States:

- 10.1.1 *“The purpose of the planning system is to contribute to the achievement of **sustainable** development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own **needs**.”*

- 10.1.2 For **Sustainability**, developments require adequate **supporting infrastructure** but there is **NO planned improvement** in the provision or delivery of new improvements to the existing Infrastructure ⁸ for **Shirley** over the life of the Plan.
- 10.2 **Housing Need**
- 10.2.1 The allocation of housing **“need”** assessed for the **“Shirley Place” [770ha]** over the period **2019 to 2039** is **278** (See Croydon Revised Local Plan ⁹ 2021 **Table 3.1**). This equates to **≈14 dwellings per year over 20 yrs**. In relation to meeting housing **“need”** we raised a Freedom of Information (FOI) request **Ref: 4250621** on **31st January 2022**. The FOI Requested data on the **“Outturn”** of Developments since **2018** for the **Shirley “Place”** plus the **Area, Housing and Occupancy** of the **Shirley Place** for which the response is as follows:
- 10.2.2 The FOI response indicated, the **Shirley “Place”** as defined in the Local Plan has an area of **approximately ≈770 ha** (i.e., *The LPA has no idea of the actual Areas of the “Places” of Croydon*) and comprises **Shirley North and Shirley South Wards** and therefore the FOI response ‘suggests’ completions for **Shirley “Place”** can be calculated by **adding** the completion figures together for each **Shirley Ward”**.
- (The statement of equivalence of the Sum of the Wards equals the Area of the “Place” is ‘NOT True.’)**
- 10.2.3 Analysis of this limited information (FOI response) supports our assumption that completions are recorded but **NOT** against the **“Places”** of Croydon and **no action** is taken by the LPA as a result of those completions. In addition, the **“Shirley Place” Area does NOT equate to the sum of the Shirley North & South Ward Areas.**
- 10.2.4 The FOI Response indicates:
- *The Council does not hold the information we requested in a reportable format.*
 - *The Council does not know the exact Area in hectares of any “Place”*
 - *The Council does not hold the Number of Dwellings per “Place.”*
 - *The Council does not hold the Number of Persons per “Place”*
- 10.2.5 Analysis of the recorded data shows that over the ‘three’ full years **2018** to end of **2020**, the **Net Increase in Dwellings for Shirley = Shirley North Ward + Shirley South Ward = 55 + 102 + 69 = 226 ≈ 75 per yr**. However, this is **NOT The Shirley “Place”** at **≈770ha** but the net increase for the **Shirley North [327.90ha] + Shirley South Wards [387.30ha]** total of **715.20ha**, a difference of **54.8ha**.
- 10.2.6 The **MORA Area of 178.20ha** (which we monitor) is only **24.92%** of **All Shirley (715.2ha)**, but at a rate of **36dpa** over the **20yr** period **≈720 dwellings**, would exceed the **Target for the Shirley “Place” of 278** by **442 Dwellings** i.e., for the **‘Whole’ of the Shirley “Place”**.

⁸ <https://www.croydon.gov.uk/sites/default/files/2022-01/infrastructure-delivery-plan-2021.pdf>

⁹ <https://www.croydon.gov.uk/sites/default/files/2022-01/croydon-local-plan-2018-revised-2021-part-1-start-to-section-11.pdf>



10.2.7 The **Build Rate Delivery** of dwellings over **3 years** for all **Shirley** is averaging at **55 + 102 + 69 = 226 Ave ≈ 75.33/yr. dwellings per year**, so over **20 years** the **Net Increase** will be **≈1507 dwellings**. (Exceeding the **278 Target** by **≈1,229**). The Target for the Shirley **“Place”** at **Croydon Plan Table 3.1** of the Revised **Croydon Local Plan** indicates a Target of **278 dwellings** over the period **2019 to 2039**. Over the Full Four Years the estimate outturn is **1257 dwellings** (see completions analysis table below).

10.2.8 This is $|278 - 1257.5|/278 = 979.5/278 = 3.5234 = 352.34%$ Increase for the **Shirley “Place” estimate** when the **MORA Area** is only $(770-178.2)/178.2 = 23.15%$ of the area of the estimated Shirley ‘Place’ and $(178.26-715.2/715.2) = 24.92%$ of all Shirley. *This is definitely NOT respecting the character of the locality when the locality of this proposal is “Inappropriate for Incremental Intensification” with a PTAL of 1b and there is no probability for increase in supporting infrastructure.*

Shirley North				
	2018	2019	2020	2021 (partial)
Gross units	48	94	73	16
Net units	45	87	69	12
Shirley South				
	2018	2019	2020	2021 (partial)
Gross units	12	17	3	5
Net units	10	15	0	5
Shirley Place				
	2018	2019	2020	2021 (partial)
Gross units	60	111	76	21
Net units	55	102	69	17

Results of Freedom of Information (FOI) request Ref: 4250621 31st Jan 2022.

10.2.9 This current rate (if retained) would exceed the Target over **20 yrs.** (of **278**) at **1257.5** by: **Percentage of Increase** of $|128 - 1257.5|/128 = 1129.5/128 = 8.8242 = 882.42%$. or a **Percentage Difference** of 128 and 1257.5 = $|128 - 1257.5|/((128 + 1257.5)/2) = 1129.5/692.75 = 1.63 = 163%$.

10.2.10 From the **FOI Request**, the Area of the **Shirley “Place”** is **≈770ha**. The total Area of **Shirley North & South Wards** is **715.2ha** (GLA figures) therefore, there is **≈54.8ha excess of land** which is in other adjacent **Wards** which numerically means the **Target for Shirley Wards** of **278** should be reduced by **7.12% = 258** (and the difference of **20** added to the **Targets** of the relevant **adjacent Wards**).

TARGET OUTTURNS (Estimates)							
Locality	Area (ha)	Dwellings	Population	Percentage of ALL Shirley	Units over 20 yrs (Estimate)	Per Year (Target Outturn)	Actual (Outturn/yr)
Shirley North Ward	327.90	6555	15666	45.85%	127	6	67
Shirley South Ward	387.30	5919	14147	54.15%	151	8	8
All Shirley	715.20	12474	29814	100.00%	258	13	75
Shirley “Place” (Approximately)	770.00	?	?	107.66%	278	14	?
MORA AREA	178.26	3884	9283	24.92%	69	3	36

Estimated Target Outturns for Shirley and the MORA Area of 178ha (24.92%) portion of All Shirley Ward Wards of 715.20ha

10.2.11 This rate (if retained) would result in the number of developments **significantly exceeding** the available **supporting infrastructure** provision which has been acknowledged as unlikely to be improved over the life of the Plan.

Completions (Not including approvals not yet started - see FOI Ref: 4250621 on 31st January 2022)	2018	2019	2020	2021 (Aug)	Total	20 Yrs (Projected)	Estimated completed 2021
Shirley North Ward	45	87	69	12	213	1095	18
Shirley South Ward	10	15	0	5	30	162.5	7.5
Shirley Place (Estimate ^{Note 1}) #1	55	102	69	17	243	1257.5	25.5
Target (278 over 20 yrs) #2	13.9	13.9	13.9	9.27	55.6	278	13.9
% increase [(#1-#2)/#2] %	295.68%	633.81%	396.40%	83.45%	352.34%	352.34%	83.45%

Note 1 : The FOI indicates the Shirley Place to be 770ha whereas Shirley North plus Shirley South Wards total 715.2ha

Completions Analysis

10.2.12 We are confident that **this analysis completely refutes** any suggestion that **“Housing Need”** is a reason for approval in this locality as the assessed **‘Housing Need’ for this area has already been satisfied.**

10.2.13 It is therefore plainly obvious that the inability to contain or mitigate the **excessive outturns** above the stated **Targets** is a **significant failure** to meet the **legally required objectives of Sustainability** as defined in the **NPPF Chapter 2. Achieving sustainable development¹⁰** as Shirley has no prospect of infrastructure improvement over the life of the Plan. The **Sustainability of Developments** is a **legal requirement¹¹** of development approvals.

10.2.14 We challenge the use of **“Place”** Target if those **Targets** for each **“Place”** are **NOT monitored** or if deviating from the requirement, there is no mitigating action to manage those Targets to meet **“Sustainable Developments”**. It is our understanding that **Managing Developments** is the prime responsibility and the Job Description of the LPA **“Development Management”**. **All Development proposals should be judged on compliance to adopted Planning Policies and NOT on the basis of meeting Targets to support a Housing “need” especially so if that “need” has already been met, and there are NO infrastructure improvements to support the surpassing of that “Need.”**

11 The Planning Process

11.1 The forgoing submission is compiled on the grounds of **National and Local Planning Policies** and there has been one **subjective assessment** on the **architectural appearance** and **roof form** comment but otherwise all comments have been based upon rational observations and evaluation. Therefore, we respectfully request that all our foregoing analysis and evidence is a sound assessment and therefore extremely relevant to the final determination.

¹⁰

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf

¹¹ <https://www.legislation.gov.uk/ukpga/2004/5/section/39>

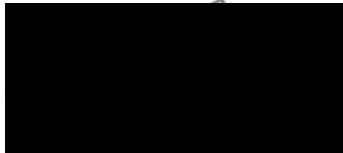
- 11.2 We reiterate, if the **Case Officer disagrees** with any of the above assessments or analysis in any respect or additionally for the assessment of “**Gentle**” **Densification**, we respectfully request that the **Case Officer’s Report** to officers or Committee Members, provides an explanation of the **professional appraisal** of the **Area Type Setting, Site Capacity Assessment**, and the professional definition of “**Gentle Densification**” with fully justifiable supporting evidence to qualify why the **Croydon LPA** should have **different Policies** to those espoused by the **National Model Design Code & Guidance** as referenced from the **NPPF paras 128 & 129**.
- 11.3 The December 2022 consultation on reforms to the NPPF, includes further clarification on how housing targets are derived, delivered, and monitored. It seeks to give greater flexibility to responding to local circumstances and the promotion of character over density. This is highlighted in the recent PAS Report.
- 11.4 Local Residents have “**lost confidence in the Planning Process**” resultant on recent local **over-developments** and the lack of any additional supporting **infrastructure**, which, in the majority of cases, disregarded Planning Policies. Once that confidence is **lost**, it is extremely difficult to regain it.
- 11.5 **Local Planning Authority Service Transformation :**
- “Over recent years there has been clear feedback from residents and customers that Croydon’s planning service needs to be transformed to become more responsive to resident’s and applicant’s concerns. Executive Mayor Perry made a clear manifesto pledge in the 2022 pre-election period to revoke the Croydon suburban design guide supplementary planning document (SPD2).*
- The Executive Mayor’s pledge, which has subsequently led to the revocation of SPD2 reflects a commitment to ensure that new development respects character, is led by design over density and improves the quality of future development. It is proposed that the Planning Transformation Programme will include a work stream on resident engagement and customer service as part of developing a more responsive and engaged planning service.”*
- 11.6 Confidence and support of local residents is necessary to ensure the general requirement of housing ‘**need**’ is supported and satisfied with the provision of appropriate sustainable developments. This can only be achieved by ensuring developments **fully comply** with the agreed **National and Local Planning Policies and Guidance**.
- 11.7 We urge the **LPA to refuse this application** and request the applicant to submit a revised proposal meeting the defined **National Model Design Code and Guidance** as published by the **Department for Levelling Up, Housing & Communities** (January & June 2021) **Build form Policies** for an “**<Outer Suburban**” **Area Type Setting**, supported by the **Regional** (London) and **Local** (Croydon) adopted and emerging **Local Plans**.



11.8 Please Register this representation as **Monks Orchard Residents' Association (Objects)** on the Public Access Register.

Kind regards

Derek



Derek C. Ritson I. Eng. M.I.E.T.
MORA – Planning
Email: planning@mo-ra.co

Cc:

Sarah Jones MP

Cllr. Sue Bennett

Cllr. Richard Chatterjee

Cllr. Mark Johnson

Croydon Central

Shirley North Ward

Shirley North Ward

Shirley North Ward

Bcc:

MORA Executive Committee, Local affected Residents & Interested Parties