

Christopher Grace – Case Officer  
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**Monks Orchard  
Residents' Association  
Planning**

1<sup>st</sup> July 2024

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Reference:	24/01924/FUL
Application Received	Mon 03 Jun 2024
Application Validated	Mon 03 Jun 2024
Address:	159 - 161 The Glade Croydon CR0 7QR
Proposal:	Demolish two existing bungalows and associated garages to create a combined site of 950 sqm to deliver four family homes with associated parking, gardens and cycle storage, and visitor parking.
Status:	Awaiting decision
Consultation Expiry:	Thu 11 Jul 2024
Determination:	Mon 29 Jul 2024
Case Officer:	Christopher Grace

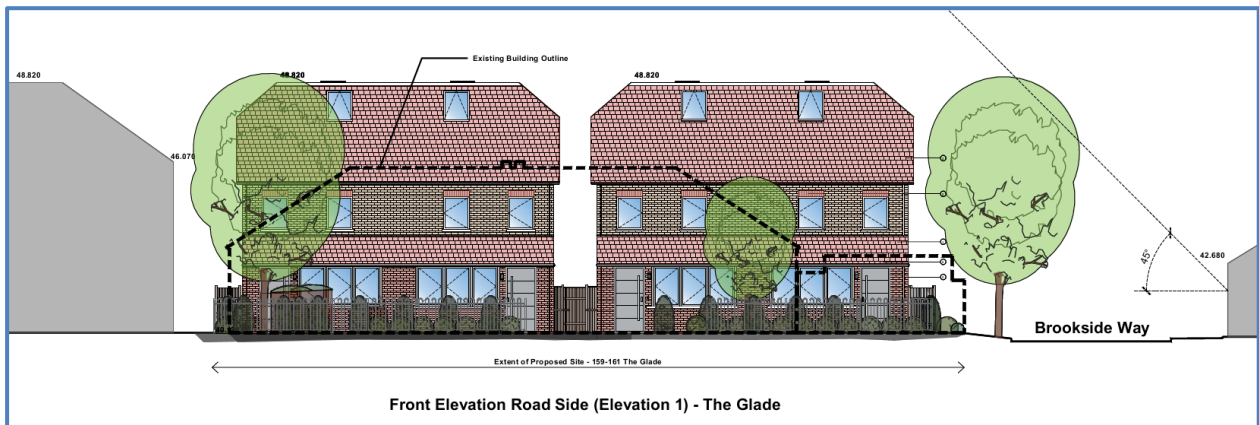
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Dear Mr Grace – Case Officer,

Please accept this letter as a formal objection to **Application Ref: 24/01924/FUL** Demolish two existing bungalows and associated garages to create a combined site of 950 sqm to deliver four family homes with associated parking, gardens and cycle storage, and visitor parking.

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:**



## The Proposal's Parameters:

159-161 The Glade			App Ref: 24/01924/FUL											
Site Area	950	sq.m.	Supplied Drawings			Floor Area Ratio			0.63			Post Code	CR0 7QR	
App Form	0.095	ha	Bedrooms Density	168.42	b/ha	Plot Area Ratio			0.32			Area	0.410033	ha
Footprint	307.65	sq.m.	Residential Density	294.74	bs/ha							Persons	17	(persons)
Units	4		Housing Density	42.11	U/ha	PTAL	2011	1.33	(1b)	Dwellings	12	(Units)		
			Average Occupancy	7.00	bs/unit	PTAL	2021	1.33	(1b)	Housing Density (U/ha)	29.27			
						PTAL	2031	1.33	(1b)	Residential Density (bs/h)	41.46			
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) (Note 2)	Amenity Space (Required)	Probable Adults	Probable Children	Play Space (Required)	
Unit 1	"A" M4(2)	Ground	0	0	58.7		2.0	3.0	52.38	7	2	5	50	
		First	3	5	51.7	0.0								
		Second	1	2	40.1	Note 1								
Sub Totals			4	7	150.5	121.00	2.0	3.0	52.38	7	2	5	50	
Unit 2	"A" M4(2)	Ground	0	0	58.7		2.0	3.0	53.55	7	2	5	50	
		First	3	5	51.7	0.0								
		Second	1	2	40.1	Note 1								
Sub Totals			4	7	150.5	121.00	2	3.0	53.55	7	2	5	50	
Unit 3	"A" M4(2) M4(2)	Ground	0	0	58.7		2.0	3.0	54.00	7	2	5	50	
		First	3	5	51.7	0.0								
		Second	1	2	40.1	Note 1								
Sub Totals			4	7	150.5	121.00	2	3.0	54.00	7	2	5	50	
Unit 4	"A" M4(2) M4(2)	Ground	0	0	58.7		2.0	3.0	53.30	7	2	5	50	
		First	3	5	51.7	0.0								
		Second	1	2	40.1	Note 1								
Sub Totals			4	7	150.5	121.00	2	3.0	53.30	7	2	5	50	
<b>Grand Total</b>			<b>16</b>	<b>28</b>	<b>602</b>	<b>484</b>	<b>8</b>	<b>12</b>	<b>213.23</b>	<b>28</b>	<b>8</b>	<b>20</b>	<b>200</b>	
<small>Note 1: It is not clear whether the second floor Utility Area contributes to In-Built Storage requirement.</small>														
<small>Note 2: As roughly scaled off the Ground Floor Plans magnified @ 110% (As not mentioned on Plans or Design &amp; Access Statement)</small>														

## Growth – “Incremental Intensification.”

### London Plan Policy H2 Small sites

**Para 4.2.1 states:** “For London to deliver more of the housing it needs, small sites (below **0.25 hectares** in size) must make a substantially greater contribution to new supply across the city. Therefore, increasing the rate of housing delivery from small sites is a strategic priority. Achieving this objective will require positive and proactive planning by boroughs both in terms of planning decisions and plan-making.”

**However, Para 4.2.4 states:** “**Incremental intensification** of existing residential areas within **PTALs 3-6** or within **800m distance of a station**<sup>47</sup> or **town centre boundary**<sup>48</sup> 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 buildings and residential garages, were these results in net additional housing provision. These developments should generally, be supported where they provide well-designed additional housing to meet London’s needs.”

The presumption of this **London Plan Policy H2** for “**Incremental Intensification**” is therefore that it is **limited to Area Types** with a **PTAL ≥3** and within **800m of a Tram/Train Station or District Centre**. If the proposed development is in an **Area Type PTAL <3** and greater than **>800m of a Tram/Train Station or District Centre**, **‘Incremental Intensification’ would thus be inappropriate**.

Note: The policy does not state whether the **800m** distance relates to the **‘line-of-sight’** (shortest) or the shortest **physical travelling distance**, (walking or cycling). A Google Earth assessment shows the distance from **159 -161 The Glade** to the **Arena Tram Stop** is within **800m Line-of-sight** but the **physical travelling distance** is approximately **907m. i.e., >800m**.



**Physical distance from the Arena Tram Stop to 159-161 The Glade**

Address or co-ordinates

Access level (PTAL) | Time mapping (TIM)

PTAL: a measure which rates locations by distance from frequent public transport services.

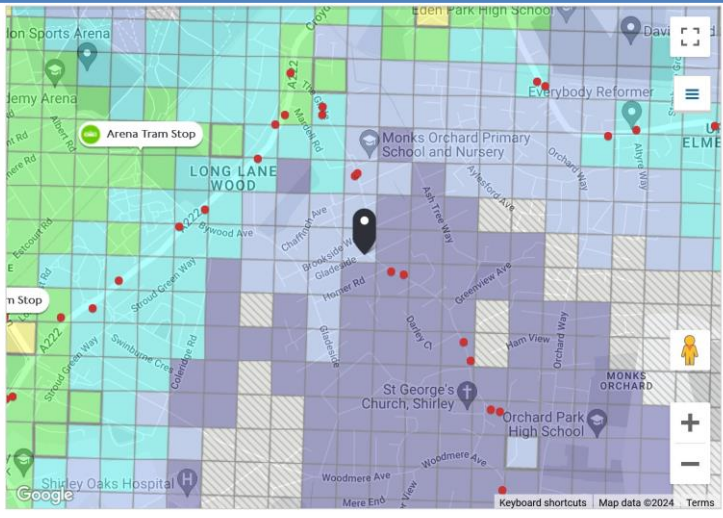
Map key - PTAL

0 (Worst)	1a
1b	2
3	4
5	6a
6b (Best)	Change from base year

Map layers  
 PTAL (cell size: 100m)

Scenario

Highlight locations where PTALs have changed from Base Year



You can click anywhere on the map to change the selected location.

**PTAL output for 2031 (Forecast)**  
**1b**  
**CR0 7QR**  
 The Glade, Croydon CR0 7QR, UK  
 Easting: 535860, Northing: 167309

**TfL WebCAT return for Post Code CR0 7QR**

This is interpreted to mean any proposed development should be within the existing 'Area Type' Design Code parameter limitations of the Locality; viz (Post Code CR0 7QR).



The TfL WebCAT returns a PTAL of 1b for the Application Site and thus the Site is inappropriate for “**Incremental Intensification**” from that as defined by the proposal’s local ‘Area Type.’

**‘Area Type’ setting Analysis.**

The determination of ‘Area Type’ design code needs an assessment of a representational Area reflecting the localities ‘Design Code’ <sup>1</sup> parameters.



**Post Code Area as calculated using the Google Earth Polygon feature**

Parameters of Post Code 'CR0 7QR' Design Code		
Area Design Code Parameter (These parameters auto calc Design Code)	Input Parameters	
<b>Post Code</b>	<b>CR0 7QR</b>	
Area of Post Code (ha)	0.4100	hectares
Area of Post Code (Sq.m)	4100.33	sq.m.
Number of Dwellings (Units) (*)	12	Units
Number of Occupants (Persons)	17	Persons
Occupancy	1.42	Person/dwelling
Post Code Housing Density	29.27	Units/ha
Post Code Residential Density	41.46	Bedspaces/ha
Area Type (National Model Design Code)	<b>Outer Suburban</b>	Setting
(*) Last updated on 23 June 2024		

<sup>1</sup> <https://www.google.com/search?client=firefox-b-d&q=national+model+design+code>

The simplest methodology is to assess the local **Post Code Area** for such an assessment as we know of no other 'Area' designation for which an appropriate parameter or data is defined or available. Parameters can be determined by research, the **Number of Dwellings**<sup>2</sup> and **Occupants**<sup>3</sup> and the **Post Code Area** can be reasonably estimated by use of **Goole Earth Polygon** feature.

The **Post Code CR0 7QR** has an Area of **0.41hectares** and embraces **12 Units** (**Housing Density 29/27Units/ha**) which equates to an **Outer Suburban Area Type** setting as defined by the **National Model Design Code & Guidance**.

Application Design Code Details			
Application Ref:	24/01924/FUL		
Address:	159-161 The Glade		
PostCode:	CR0 7QR		
<b>Application Parameters</b>			
Site Area (ha)	0.0950	ha	
Site Area (sq.m.)	950.00	sq.m.	
Units (Dwellings)	4.00	Units	
Bedrooms	16.00	Bedrooms	
Bedspaces	28.00	Persons	
Housing Density	42.11	Units/ha	
Residential Density	294.74	bs/ha	
Occupancy	7.00	bs/unit	
Gross Internal Area (GIA) offered	602.00	sq.m.	
Floor Area Ratio	0.63	#	
		Min	Max
Area Type Setting (Units/ha)	Suburban	40.00	60.00
Area Type Setting (Bedspaces/ha)	Central	283.20	<283.2

#### Application Design Code Details

The proposed Application would provide 4 units on a site area of 0.095ha equating to a Housing Density of **42.11Units/ha** and with **28 occupants**, would provide a Residential Density of **294.74Persons/ha**. These application parameters would place the application in a **Suburban Area Type** Housing Density with a high Residential Density more appropriate to a **Central Area Type** Residential Density.

**This is ample evidence of an inappropriate overdevelopment for the Area Type location at Post Code CR0 7QR.**

### Site Capacity.

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

*Para 3.3.2 States: 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.*

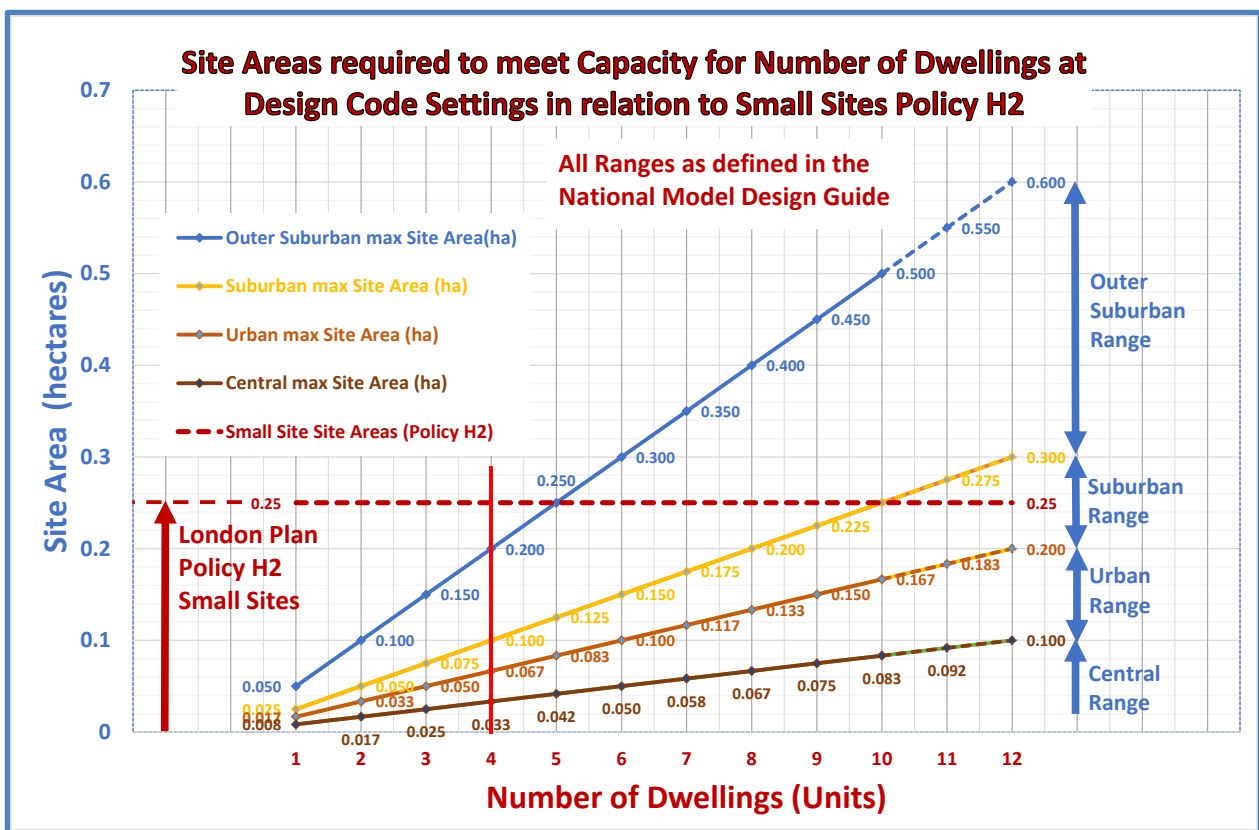
The attributes of a development site are the **Area Type** Setting of the locality and the **Site Area** available for the proposed development. These are fundamental to the

<sup>2</sup> <https://www.gov.uk/government/organisations/valuation-office-agency>

<sup>3</sup> [https://www.postcodearea.co.uk/#google\\_vignette](https://www.postcodearea.co.uk/#google_vignette)

**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 as **29.27Units/ha = Outer Suburban Area Type setting.**

The graphical illustration below shows that the **'Outer Suburban' Area Type Setting** for **4 dwellings** requires a **Site Area** between **0.1ha** and **0.2ha** when the proposal's **Site Area** is **0.095ha** i.e., **deficient** by a minimum of **0.005ha** and maximum of **0.105ha**. Therefore, a proposed development of **4 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**

The NPPF (2023) a Section 2 - Achieving sustainable development

Para 8. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

- a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the **right types** is available in the **right places** and at the **right time** to **support growth**, innovation and improved productivity; and by identifying and **coordinating the provision of infrastructure.**



## Summary & Conclusions

We understand the need for additional homes; however, we have conclusively illustrated that the proposal offered is much too dense for the local **Area Type** and that the applicant is attempting to squeeze much too much accommodation into a very small and restricted **site capacity** which is extremely inappropriate for the locality.

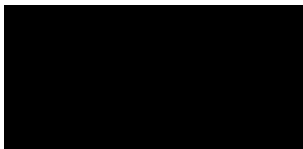
We have clearly shown that the location **CR0 7QR** is inappropriate for **“Incremental Intensification”** and unsuitable for **“Growth”** beyond the existing **Suburban Area Type** setting without the offer of significant infrastructure improvement.

The **Site Capacity** of **0.095ha** is inadequate for **4 Units** at a **Suburban Area Type** setting.

We therefore suggest that this proposal is refused and that a new proposal is presented which is less dense and more appropriate for the Local **Area Type** Setting as defined by the local character parameters of the **Post Code CR0 7QR**.

Kind regards

Derek



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Cc:

Cllr. Sue Bennett  
Cllr. Richard Chatterjee  
Cllr. Mark Johnson

Shirley North Ward  
Shirley North Ward  
Shirley North Ward

Bcc:

MORA Executive Committee, Local Affected Residents', Interested Parties