

Ms Grace Hewett

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**Monks Orchard
Residents' Association
Planning**

23rd August 2021

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Reference	21/03518/FUL
Application Received	Thu 01 Jul 2021
Application Validated	Thu 01 Jul 2021
Address	13 Gladeside Croydon CR0 7RL
Proposal	Demolition of existing dwelling and erection of a two-storey detached building with accommodation in roof space comprising 6 flats and provision of associated landscaping, car parking, refuse and cycle storage.
Status	Awaiting decision
Case Officer:	Grace Hewett
Consultation Date:	Wed 25 Aug 2021
Decision Deadline:	Wed 22 Sep 2021

Dear Ms Hewett

Please accept this letter as a formal objection to **Application Ref: 21/03518/FUL** for Demolition of existing dwelling and erection of a two-storey detached building with accommodation in roof space comprising 6 flats and provision of associated landscaping, car parking, refuse and cycle storage.

The **Monks Orchard Residents' Association** is registered with the **Croydon LPA** and represents approximately **3,800** households in the **Shirley North Ward**. We understand the '**need**' for additional housing, but that new housing developments and Residential Extensions & Alterations **must** be **sustainable**^[1] and meet the current and emerging planning policies to ensure future occupants have acceptable living standards and acceptable accessibility to public Transport Infrastructure.

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 vaguely specified policies which are subject to varying interpretations.

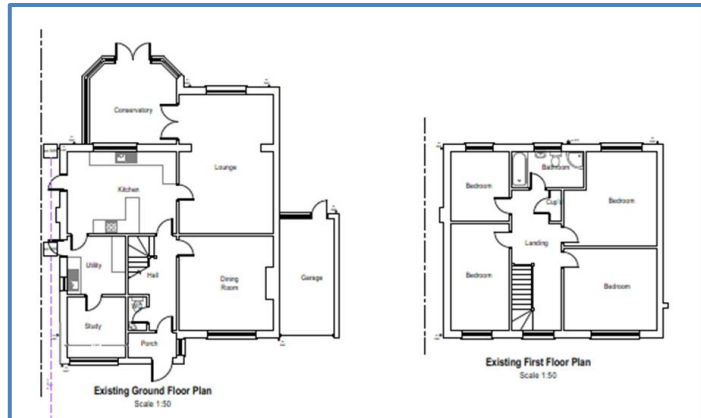
The proposal is for demolition of a **family Detached House** of an *estimated 8 habitable Rooms* in a Site Area of **625.05m² (0.0625ha)** with an *estimated Residential Density* of **127.99hr/ha** or **95.99bs/ha** and a **Housing Density** of **15.99units/ha**, replaced with one **block** containing **6 flats** fronting Gladeside.

[1] <https://www.legislation.gov.uk/ukpga/2004/5/section/39>

Existing family home:



Image 1- Existing dwelling



13 Gladeside					
Existing	Site Area	625.05	sq.m.	0.062505	ha
	Habitable Rooms	Bedrooms	Bed Spaces	Car Parking Spaces	GIA
Ground Floor	4	0	0	3	Not known
First Floor	4	4	6	0	Not known
Total	8	4	6	3	Not known
Residential Density	127.990	hr/ha	Car spaces/Occupant		0.5
Residential Density	95.992	bs/ha	Floor Area Ratio (Not Known)		
Housing Density	15.999	units/ha			

Existing 13 Gladeside - Dwelling parameters (Details from previous application)

Parameters of proposal:

	Units	6	Residential Density		303.9757	hr/ha	Uplift Residential Density		175.986	hr/ha	PTAL			
	Site Area	625.05	sq.m.	Residential Density	319.9744	bs/ha	Uplift Residential Density	223.982	bs/ha		2011	1a		
	Site Area	0.062505	ha	Housing Density	95.99232	unit/ha	Uplift Housing Density	79.994	units/ha		2031	1a		
New	Floor	Bedrooms	Bed-Spaces available (Persons)	Habitable Rooms	GIA Offered	GIA Required	Built-In Storage offered (Note1)	Built-In Storage Required	Private Open Space offered (sq.m.)	Car Parking Space	Disabled Bay or Electric Charging Point	Cycle Store	Estimated Number of Adults	Estimated Number of Children
Flat 1 (M4(2) Accessible and adaptable)	Ground	3	4	4	74.3	74	2.5	2.5	51.2	1	EC x 2	2	2	2
Flat 2 (M4(3) Wheelchair user)	Ground	2	4	3	78.7	70	1.6	2	24.2	1	Not Disable	1	2	2
Flat 3 (M4(2) Accessible and adaptable)	First	2	3	3	62.4	61	1.1	2	6.5	1	EC	2	2	1
Flat 4 (M4(1) Visible)	First	3	4	4	77.8	74	1.7	2	7	1	EC	2	2	2
Flat 5 (M4(1) Visitable)	Second	1	2	2	51	50	0.6	1.5	6	0		2	2	0
Flat 6 (M4(1) Visitable)	Second	2	3	3	64	61	2.1	2	7	0		2	2	1
Totals		13	20	19	408.2	390	9.6	12	101.9	4	0	11	12	8
Average hr/unit	2.11	hr/u		Car Spaces per occupant			0.20	Floor Area Ratio (FAR)			0.65			
				Car Spaces per adult			0.33							
	Note 1	Flat 2 Wheelchair Storage separate & Built in Wardrobe not counted against minimum												
	Note 1	Flat 3 indicates 1.7m ² Utility Storage & 1.1m ² Storage in Bathroom												
	Note 1	Flat 5 indicates 2.2 m ² Utility Storage & 3.1m ² Storage in Bathroom												

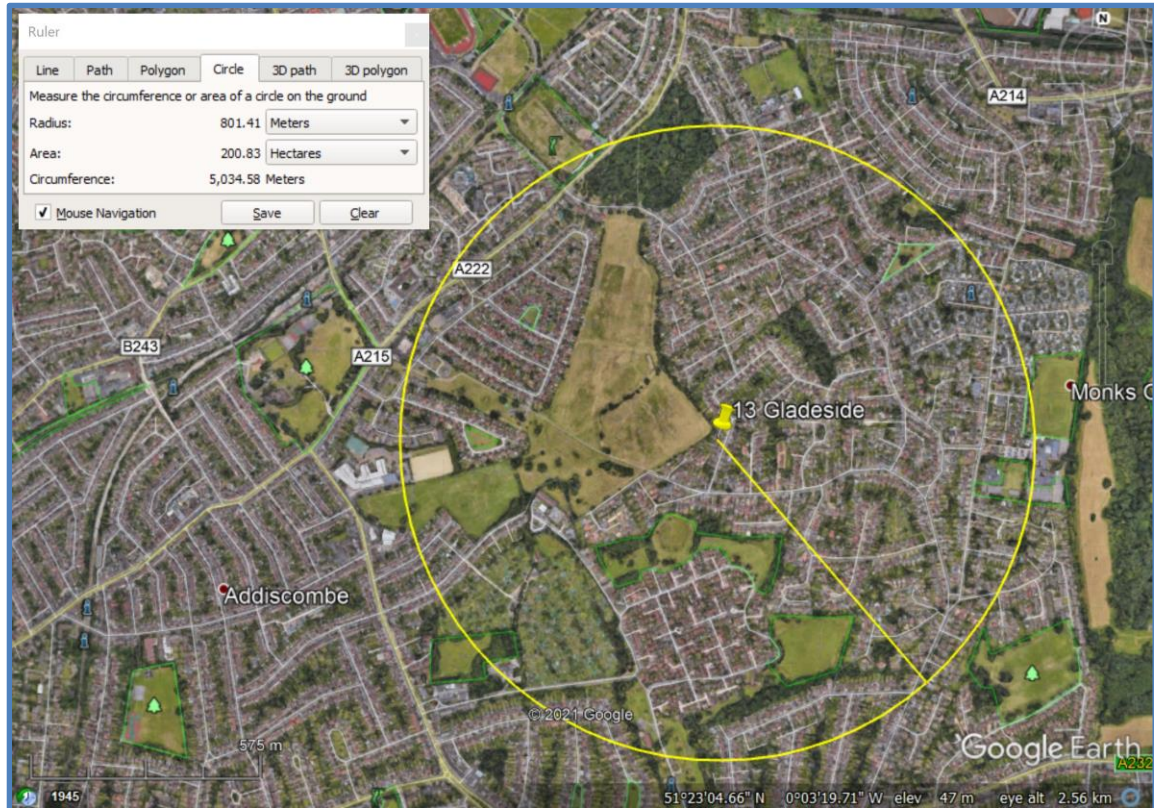
Proposed Development parameters as provided by the Applicant.

1 Site Location & Character Appraisal:

- 1.1 The Local Character is predominantly detached and semi-detached houses of two storeys with garages and associated generous medium sized garden space but with PTAL at **1a** and forecast to remain at **1a** up to 2031. Even so, a sought after suburban residential area.
- 1.2 The Google Earth image (below) illustrates the development site for this proposed development at **13 Gladeside** which has Public Transport Accessibility Level **1a** and is over **800m** radius from any Train Station or Tram Stop and is greater than **800m** (Line of Sight) from the Shirley 'Local' Centre (i.e., not a 'District' Centre) and therefore the locality is **NOT 'appropriate'** for **"Incremental Intensification"** as defined by the **London Plan (2021) Para 4.2.4.**

London Plan (2021) Policy H2 – Small Sites: Para 4.2.4:

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



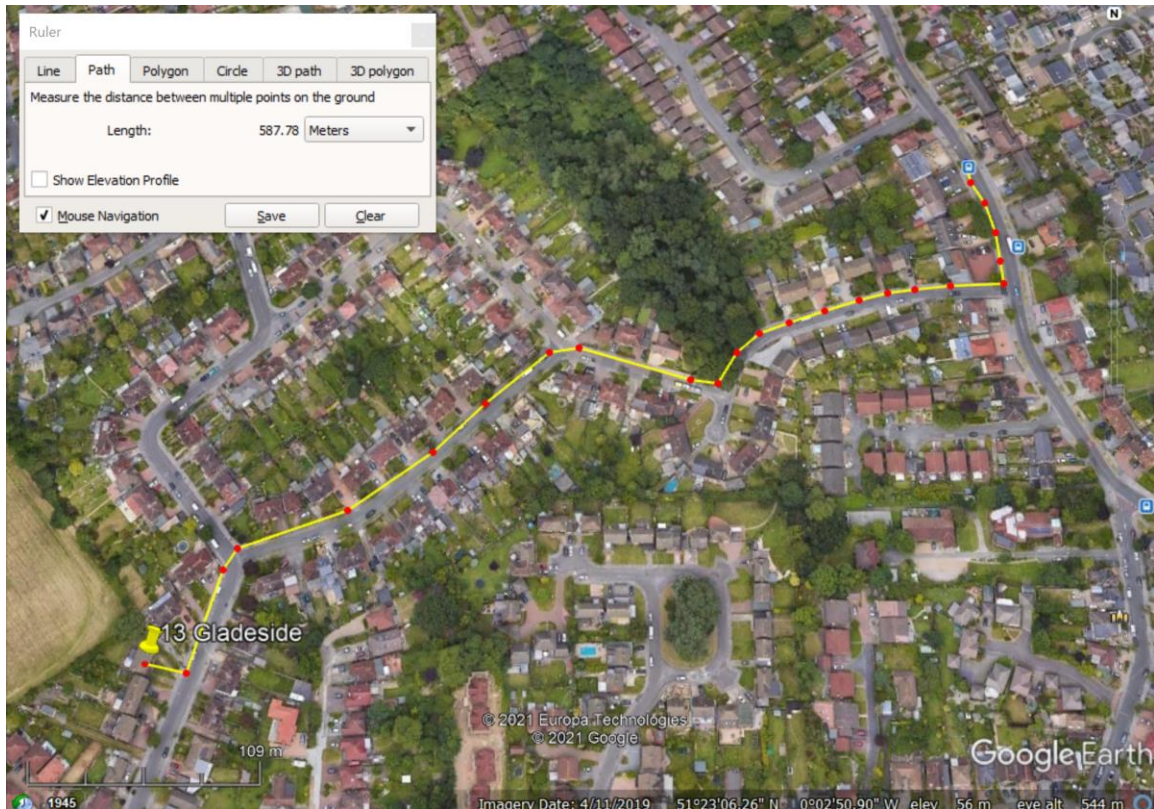
Google Earth Image showing Location of 13 Gladeside exceeding 800m from any Tram/Train Station and exceeding 800m from the nearest Local or District Centre – Therefore ‘Inappropriate’ for Incremental Intensification.

1.3 Public Transport Accessibility:

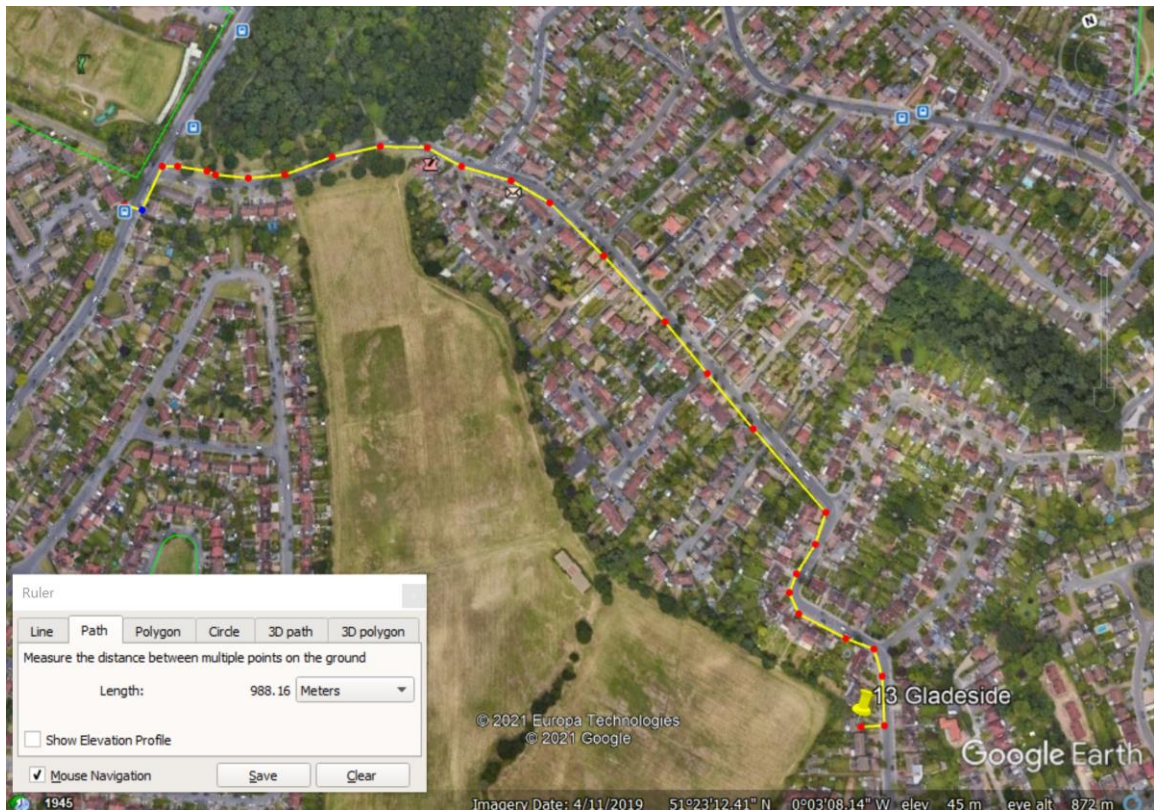
- 1.3.1 Gladeside has a poor level of Public Transport Accessibility Level (PTAL) at PTAL 1a provided by a single decker 367 Bus Service between Bromley and West Croydon via The Glade (between the A232 and the A222) via a winding diverse route at service intervals averaging ≈20 minutes and the 289 service between Elmers End (A222/A215) to Purley via West Croydon.
- 1.3.2 Walking distances to the nearest 367 Bus Stops in The Glade is about ≈587.78m, (Bromley direction bus stop) and ≈542.02m (for Croydon direction).
- 1.3.3 The nearest 289 Bus Stops, across the Ashburton Playing Fields, to the A215/A222 Bus Stops at ≈931m toward Croydon/Purley and ≈988.16m toward Elmers End.

[2] Tube, Rail, DRL or Tram Station.

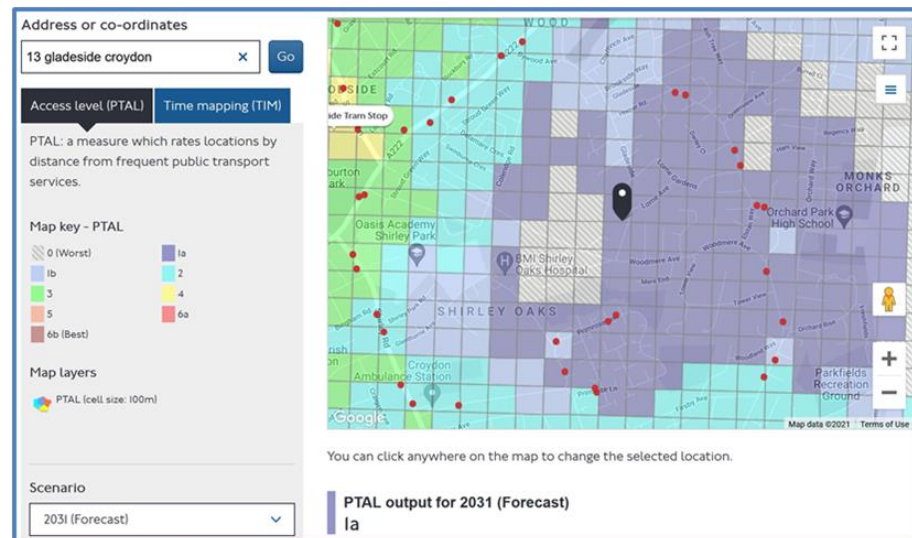
[3] District, Major, Metropolitan and International Town Centres.



Walking Distance to the Glade 367 Bus Stops



Walking Distance to the A222/215 289 Bus Stops



TfL WebCAT showing PTAL Zero for the Site forecast to 2031

2 General Comments on Design & Character

- 2.1 This proposed development would result in the loss of a family home with garden. The proposed development is dominant and out of keeping with the local character of Two Storey Detached and Semi-Detached Houses with generous spacious gardens.
- 2.2 The ground floor Flat 2 is to M4(3) Wheelchair user accommodation Building Regulation Standard but there is **NO Disabled Car Parking provision** within the 4 allocated spaces.
- 2.3 Only **Flats 1 and 6** meet the minimum **built-in Storage** requirement of the London Plan Table 3.1, **Flat 2** has designated **wheelchair storage** which we believe is not counted toward the minimum storage standard. All other **Flats** are **deficient** in in-built storage capacity. **Flats 3 & 4** indicate 1.7m² Utility Storage (for Tumble Dryer) which is not considered to count against in-built Storage. **Flat 3** has 1.1m² Storage in the bedroom. **Flat 4** indicates 1.1m Storage in the Bathroom but this is considered a misprint error rather than a designation error. **Flat 5** indicates 2.2m² Utility Storage (not accredited to in-built storage) & 3.1m² Storage in Bathroom, again considered a misprint error rather than a designation error. **Flat 6** shows 2.6m² Built in Wardrobe Storage which counts toward GIA, but we believe do not count against required built in storage. **Flat 6** has separate 2.1m² built-in storage provision.
- 2.4 The **New London Plan Policy D6 - Housing quality and standards** at **Table 3.1** states *“these are **MINIMUM** requirements that should be exceeded if at all possible”*. Table 3.2 Item IV requires Communal outside amenity spaces should provide sufficient space to meet the requirements of the number of residents of the development but does not specify how much space per resident that should be. Failure to meet these minimal **Space Standards** gives a good indication of overdevelopment of **‘Site Capacity’** as the developer is squeezing as much as possible onto a limited site area at the expense of the minimum **Space Standards** and other requirements, such as **play space** for children, **communal open space** and **off-street parking** provision.

2.5 The requirement of **DM13.1** has been **breached** as the refuse and recycling facilities (Bin Stores) for proposed development are NOT within the building envelope, are positioned on the forecourt and are visually intrusive and compromise the provision of shared amenity space.

2.6 Croydon Local Plan at Para DM13.1 States:

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**;

3 The Croydon Local Plan & The London Plan 'Growth' Policies.

3.1 The LPA has a **Statutory requirement** ^[4] to ensure that proposed developments are **Sustainable** – (Section 39(2) of the Planning and Compulsory Purchase Act 2004) and **NPPF** ^[5] **Section 2 - Achieving sustainable development**. In order to comply with this **legal requirement**, a criterion or definition of **'sustainability'** and the measurable quantifiable parameters for assessing **'sustainability'** within the proposed development **'Site Capacity'** are necessary to comply with the definition of the **sustainability criterion** in the Local Plan but **are conveniently omitted** by the Spatial Planning authors of the adopted **Croydon Local Plan (2018)**.

3.2 **Croydon Local Plan Policy Table 6.4 - Accommodating growth:**

Table 6.4 Accommodating growth and improving Croydon

Method of accommodating growth and improving Croydon	How it works	Applicable policies
Evolution without significant change of area's character	Each character type has a capacity for growth. Natural evolution is an ongoing process where development occurs in a way that positively responds to the local context and seeks to reinforce and enhance the existing predominant local character. Most development throughout the borough will be of this nature.	DM10.1 – DM10.10
Guided intensification associated with enhancement of area's local character	Areas where the local character cannot be determined as a result of no one character being dominant, further growth can be accommodated through place specific enhancement policies.	DM34 – DM49
Focussed intensification associated with change of area's local character	Further growth can be accommodated through more efficient use of infrastructure. Due to the high availability of community and commercial services, intensification will be supported in and around District, Local and potential Neighbourhood Centres which have sufficient capacity for growth.	DM10.11
Redevelopment	In larger areas where growth would result in a change to the local character it must be supported by masterplans or design codes.	DM36.2 DM38.1 DM49.1

Croydon Local Plan Policy for "Growth" at DM10 Table 6.4

3.3 The Croydon Local Plan 'Growth' Policies in **Table 6.4**, **DM10.1 to DM10.11 or DM34 to DM49 and DM36 to 49**, **'purports'** to describe regeneration **"Growth"** by either **"Redevelopment"** or **"Evolution"** but gives no definition of the acceptable magnitude of growth in terms of **'Site Capacity'**, **'Local and future infrastructure'** ^[6]

[4] <https://www.legislation.gov.uk/ukpga/2004/5/section/39>

[5]

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

[6] <https://drive.google.com/file/d/1v7u6ID7rqzjJDsMwQueuf5-c7x6GpZel/view>

or **'Public Transport Accessibility'** ^[7] and 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. The Policy Fails to meet the guidance required in **NPPF** ^[8] (2019) **Section 3. Plan-making** and specifically **NPPF para 16 d) or Para 35, a) Positively prepared, b) Justified, c) Effective & d) Consistent with National Policy** or more importantly the **Statutory requirement** to ensure **'Sustainable Developments'** ^[9]. In fact, the Policy is quite **"meaningless"** and **"nugatory"** but is subject to the **"professional"** judgment of Case Officers without any objective justification.

- 3.4 The Policy provides a **vague objective** that does not consider the limits or allow a substantive determination reflecting the new **London Plan Policy** ^[10] 4.2.4 or to determine the criteria how areas **'inappropriate'** for **"Incremental intensification"** should be assessed.
- 3.5 It is noted that the **"Pre-Application Discussions"** did not include any assessment of **'Site Capacity'** limitations or Growth Limits appropriate for this proposal at this location of PTAL 1a and no evidence of guidance ^[11] was given to meet the objectives of the **London Plan Policy D3** on the **"Design-Led-Approach" or the NPPF Design Code Assessment guidance**.
- 3.6 It is not clear how this proposal meets or fails the **statutory requirement** of **sustainable development**, ^[12] including assessment of **'site capacity'** and other supporting **sustainable infrastructure** requirements including the methodology of assessment. It is unacceptable that a determination based upon a Case Officer's **'subjective prejudicial assessment'** can be recommended without **Development Management logical justification of 'sustainability'**.
- 3.7 The LPA **'Development Management'** consistently emphasise that Planning parameters should not be evaluated **"mechanistically"** but there is no other **logical methodology** to professionally evaluate planning policies as any alternatives are **unenforceable**, with no policy objectives, resulting in **subjective assessments** by **Case Officers** to their **prejudicial preferred assessments** for determinations. **"Mechanistic"** assessment against reasonably defined **'parameters'** with agreed **'tolerances'** is a preferred **'professional'** methodology for assessment which can then be fully understood by **applicants, local communities** and **Planning Officers** ^[13] and are fully enforceable.

[7]

<https://www.croydon.gov.uk/sites/default/files/articles/downloads/Development%20Infrastructure%20Funding%20Study%20%28DIFS%29%202019.pdf>

[8]

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

[9] This is a legal requirement of Local Planning Authorities exercising their plan-making functions (section 39(2) of the Planning and Compulsory Purchase Act 2004).

[10] London Plan (2021) Policy H2 Small Sites para 4.2.4 incremental intensification

[11] Pre-Application Comments – Design and Access Statement.

[12] <https://www.legislation.gov.uk/ukpga/2004/5/section/39>

[13] NPPF Para 16 d)

4 New London Plan (Published 2nd March 2021)

- 4.1 The main objective of the **New London Plan Policies D1, D2, D3 & D4** is to **“Optimise Site Capacity”**. The omission of the ‘Density Matrix’ now requires an assessment to establish the methodology to define the appropriate **‘densification’** based on **‘Site Capacity’** for **‘sustainable’ developments**.^[9] The new London Plan at **Policy D1 - London’s form, character and capacity for growth**, requires LPAs to undertake area assessments to define the characteristics, qualities and value of different places to develop different areas’ **‘capacity for growth’**. **Policy D2 - Infrastructure requirements for sustainable densities** requires Density of proposals to be linked to the provision of **future planned levels of infrastructure** rather than existing levels and **Policy D3 - Optimising site capacity through the design-led approach and Policy D4 - Delivering good design**, requires definition of area **“Design Codes”** for guidance to implement the Policies.
- 4.2 The **New London Plan** requires that **‘Gentle Densification’** should be actively encouraged by Boroughs in low-and mid-density locations to achieve a change in densities **in the most appropriate way** - **but nowhere in the London Plan or the Croydon Local Plan is there any definition of ‘Gentle Densification’ or “the most appropriate way” provided to define what this actually means!**
- 4.3 **Para 4.2.4 of the New London Plan^[14]** defines the **“Incremental intensification”** criteria for existing **Outer London Borough suburban residential areas** are required to be within **PTALs 3-6** or within **800m** distance of a train or tram station or within **800m** of town centre boundary, equivalent to a District Centre. The location at 13 Gladeside is **PTAL 1a** and the development site is beyond the **800m** limits of these defined requirements for **“Incremental Intensification”** and as such the locality of this site is therefore **‘inappropriate’** for **“Incremental intensification”**.
- 4.4 It is unlikely that the Croydon Plan will include any guidance to define the appropriate **‘Design Code’** for this proposed development at this location, prior to its adoption in 2022 unless included in a Supplementary Planning Guidance (SPG) intermediate Policy clarification. If a **‘Design Code’** is available, we request that it be described and defined in the case Officer’s Recommendation Report.
- 4.5 It is noted that the new London Plan **Policy D2 - Infrastructure requirements for sustainable densities** at **Para 3.2.4 States:**
- “3.2.4 Minor developments will typically have incremental impacts on local infrastructure capacity. The cumulative demands on infrastructure of minor developments should be addressed in boroughs’ infrastructure delivery plans or programmes. Therefore, it will not ‘normally’ be necessary for minor developments to undertake infrastructure assessments or for boroughs to refuse permission to these schemes on the grounds of infrastructure capacity.”**
- 4.6 This assertion is **totally flawed** for this location as shown by the recent approved developments in just the **MORA post Code Area** as detailed in the Histogram below. As Croydon LPA does NOT include **‘Shirley’** in the Borough’s **“Infrastructure**

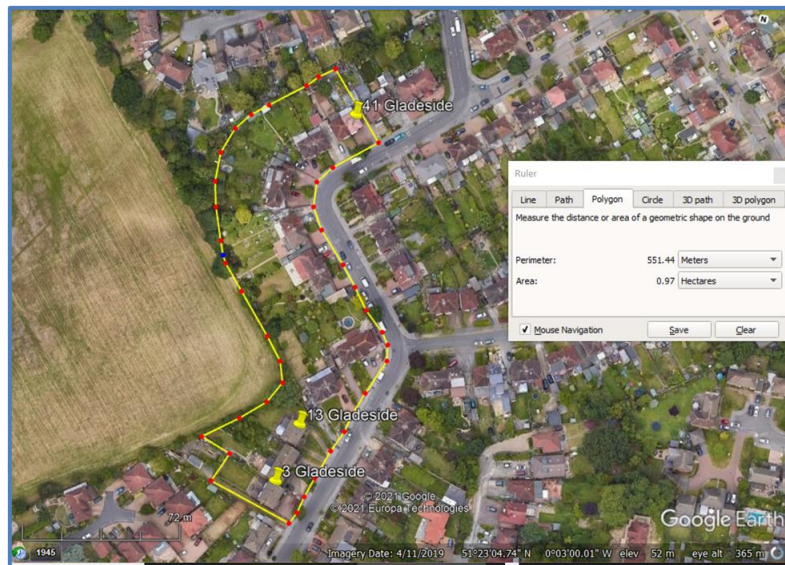
[14] London Plan (2021) Policy H2 Small Sites para 4.2.4 incremental intensification

Delivery Plans ^[15], and is not identified in the **'Borough Wide'** lists, the interpretation of Para 3.2.4 indicates it is necessary for minor development applications to include an **'infrastructure assessment'** to cater for these **'cumulative'** proposals, including all recent cumulative developments within the locality of the proposed development to assess sustainability ^[16] as the locality does not meet the "normal" criteria statement of London Plan Policy para 3.2.4 for 'infrastructure' delivery.

- 4.7 The **New London Plan SPG's Modules A, B & C** (consultation completed but not yet adopted) indicates *"Boroughs should prepare 'Design Codes' and broader forms of design governance that clarify the character of a 'place' and the elements that are important for new developments to respect"*.
- 4.8 In order to meet the objectives of the **London Plan Policies**, we have investigated possible **Design Code** parameters which are appropriate for this site. This information is documented in the **NPPF Supporting information** ^[17] para 129, 'National Design Guide' and 'National Model Design Code'.

5 Design Code Parameters for Gladeside:

- 5.1 The Post Code Area CR0 7RL contains **24 dwellings** and **60 occupants** in an area of **≈0.97ha** giving an occupancy of **2.5 persons per dwelling**. The Set Back averages from the front curtilage averages **≈6m** and the average rear garden lengths are **≈20m**. This gives a Housing Density of **24.742 Units per hectare** and a **Residential Density of 61.86 persons per hectare**.



Post Code CR0 7RL Design Codes 2B Coding Plan ^[18]

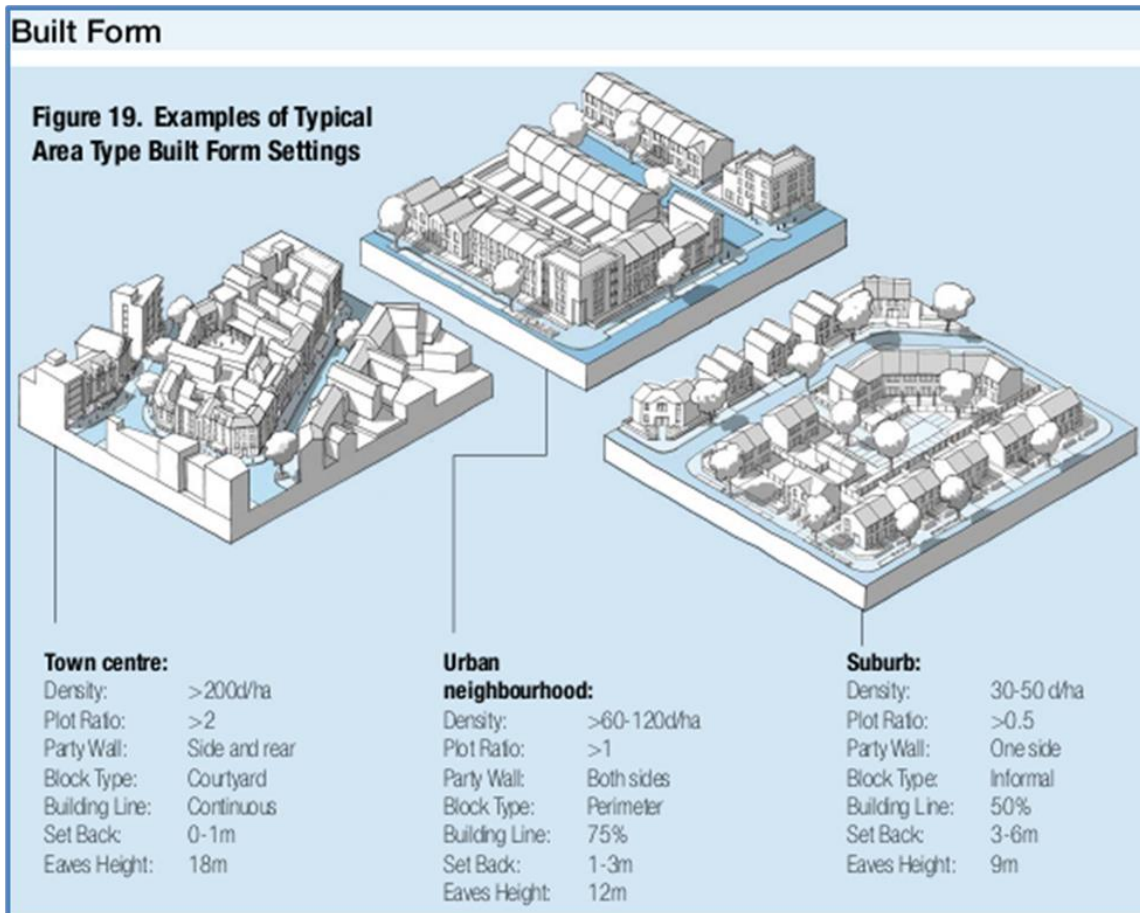
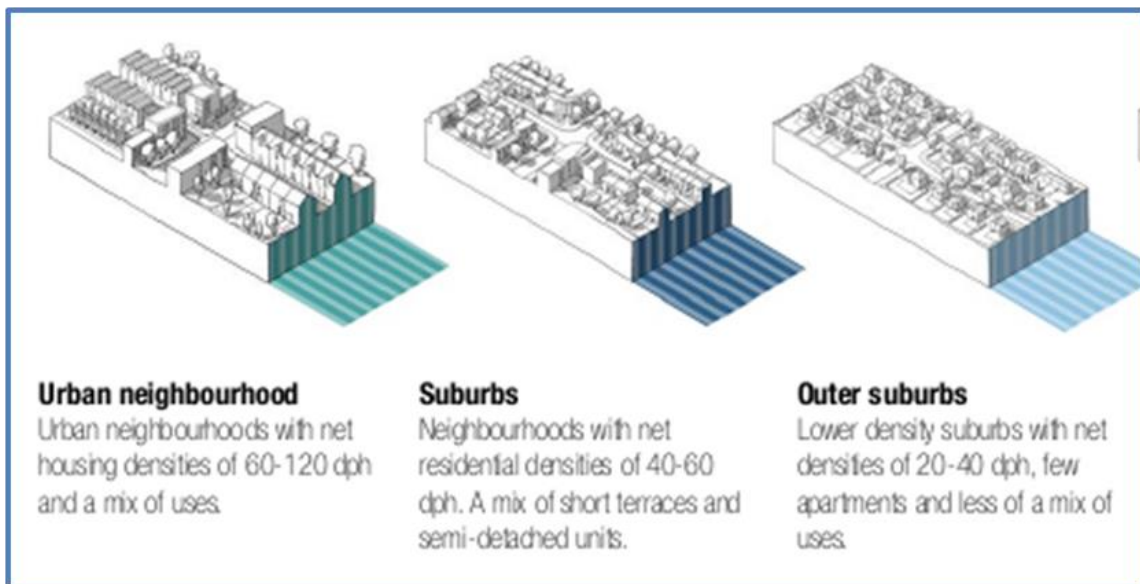
^[15] <https://drive.google.com/file/d/1v7u6ID7rqzjJDsMwQueuf5-c7x6GpZel/view>

^[16] This is a legal requirement of Local Planning Authorities exercising their plan-making functions (Section 39(2) of the Planning and Compulsory Purchase Act 2004).

^[17] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf

^[18] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/957205/National_Model_Design_Code.pdf

5.2 NPPF Design Code 2B Coding Plan ^[19]



NPPF National Design Code Guide

[19]

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/957205/National_Model_Design_Code.pdf

5.3 Shirley is defined as a “**Suburb**” in the Croydon Local Plan (2018) at “**Places**” of Croydon which the **NPPF Design Code 2B page 13** states Suburban should be **40 to 60 dwellings per hectare** but **Code 3B Para 52 Figure 19 states Suburban Housing Densities should be within 30 to 50 Dwellings per hectare**.

5.4 Shirley is defined as a **Suburb** in the Croydon Local Plan (2018) at **Places** of Croydon: Shirley Vision, opportunities, constraints and change up to 2036

Vision

11.199 Shirley will continue to be a **suburb** surrounded by substantial green space with improved cycle and pedestrian links. The vibrant Local Centre, with a range of retailing and independent shops will continue to serve the local community. A mature and rejuvenated Shrublands will be served by both local shops as well as those on Wickham Road. Shirley Road and Spring Park/ Bridle Road Neighbourhood Centres will be supporting the existing and future community with services and facilities beyond a retail function.

5.5 In order to meet the NPPF National Model Design Guide ^[20] para 52, Built Form – Density requirements, the site capacity for 0.0625ha would need to be in the range:

- Outer (London) Suburban Setting** between **1.25 (20 x 0.0625) and 2.5 (40 x 0.0625) Units** (Rounded to the nearest Integer 1 to 3).
- Suburban Setting** between **2.5 (40 x 0.0625) and 3.75 (60 x 0.0625) Units** (Rounded to the nearest Integer 3 to 4).
- Urban Setting** between **3.75 (60 x 0.0625) and 7.5 (120 x 0.0625)** (Rounded to the nearest Integer 4 to 8).

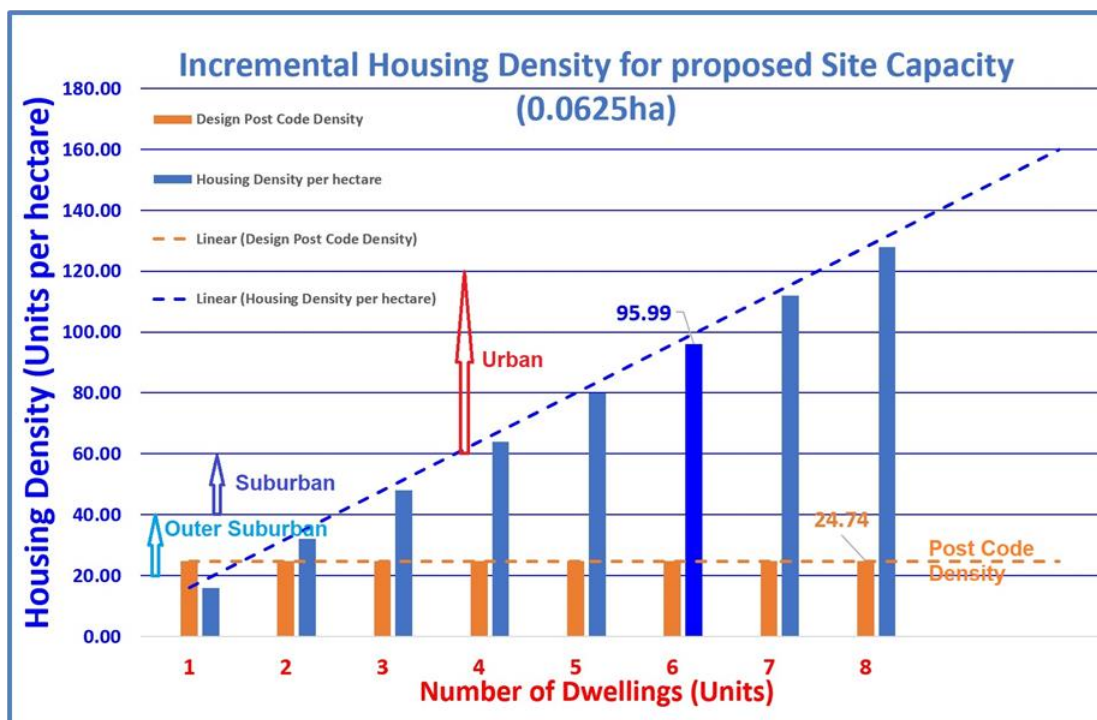


Illustration of NPPF Design Code - Number of Units (Site Capacity) appropriate for a Site Area of 0.0625 hectare in various Setting Locations.

[20]

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/957205/National_Model_Design_Code.pdf

- 5.6 A housing Density of **95.99 units/ha** at a Location with PTAL of **1a**, does **NOT** meet the **Policy D3 - Optimising site capacity through the design-led approach** as the setting could be considered as **"Outer (London Borough) Suburban"** Typology or even simply **"Suburban"**. **BUT NOT URBAN.** The **NPPF National Model Design Guide** at **Code 3A para 52 - Built Form**, quotes even greater restriction for **suburban Densities** of **30 to 50 dwellings per hectare** ^[21], but we have presumed the more lenient **Code 2B** value of **40 to 60 Dwellings per hectare**.
- 5.7 The actual proposal is for **6 Units** which is in the range of **4 to 7 Units** appropriate for an **'Urban'** Setting indicating an overdevelopment for a **'Suburban'** or **'Outer Suburban'** Setting. **The proposed development is therefore NOT compatible with the available 'Site Capacity' for a Site area of 0.0625ha in a suburban setting as defined in the London Plan Policies D1, D2, D3.** The proposal of **95.99 units/ha** at **6 units** would require the locality to be **'Urban'** which by local plan definition, and at **PTAL at 1a** and any local observation, **it clearly is NOT.** This Proposal is therefore obviously an **over-development** for the local **Suburban** or **Outer Suburban** area.
- 5.8 If the **LPA Case Officer** disagrees with the **NPPF National Model Design Guide recommended** parameters we would expect to be informed of the **justification** for **deviating** from these **Design Code Values**.
- 5.9 The **Floor Area Ratio (FAR)** is given by **GIA/Site Area** and for a Suburban Area should be **<0.5** (Less Than) whereas this proposal has Floor Area Ratio (in m²) of **408.2/625.05 = 0.65**. Thus, the proposal is **Non-Compliant** to the **Design Code** recommendation for **Floor Area Ratio <0.5** in a **suburban** locality. **This is more evidence of overdevelopment.**

Floor Area Ratio	Town Centre	> 2
GIA/Site Area	Urban Neighbourhoods	> 1
This is metric GIA divided by the Site Area in m ²	Suburbs	< 0.5

Population Density Analysis - Shirley North Ward			
Shirley North Ward (2019)	15058		Undeveloped Open Spaces:
Area Km ²	3.279	km ²	Ashburton Playing Fields
Area Hectares	327.9	ha	Long Lane Wood
Population Density (per km ²)	4592.25374	per km ²	Monks Orchard & Orchard Way Primary School (Playing Field)
Population Density per ha (2019)	45.9225374	per ha	Orchard Park High School (Playing Field)
Annual Population Change (2011-2019) %	0.02	%	Parkfields Rec
Population Shirley North Ward (2021)	15660		Glade Woods, Greenview Green & Kempton Walk
Population Shirley North Ward per Km ² (2021)	4775.94389	per km ²	Primrose Lane (Allotments & Gardens)
Population Shirley North Ward per ha (2021)	47.7594389	per ha	Shirley Oaks Village Green
Area of Shirley North Ward minus Open Spaces	275.68	ha	Allotments (Tower View, Ash Tree Way)
Average Population Density (Built Area)	56.8061521	per ha	Total (Undeveloped Open Green Space Area)
			52.22 ha

GLA Data Set for Shirley North Ward Population Density
Illustration of Local Population Densities in People or Bed Spaces per Hectare (Minus the undeveloped Open Space Area)

[21]

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1009539/NMDC_Part_1_The_Coding_Process_web.pdf

- 5.10 The Dwellings and local supporting infrastructure is used by ‘people’ (*not Housing Units*) and therefore there should be some equivalent limits to local *Population Density* in relation to ‘*Site Capacity*’ for an appropriate *Residential Density (Bedspaces/ha)*, to ensure adequate spatial accommodation standards and *supporting infrastructure* availability for *sustainable development* are met, but I have not found any policy definition in the available published supposedly professional guidance for this parameter. *Astonishing!*

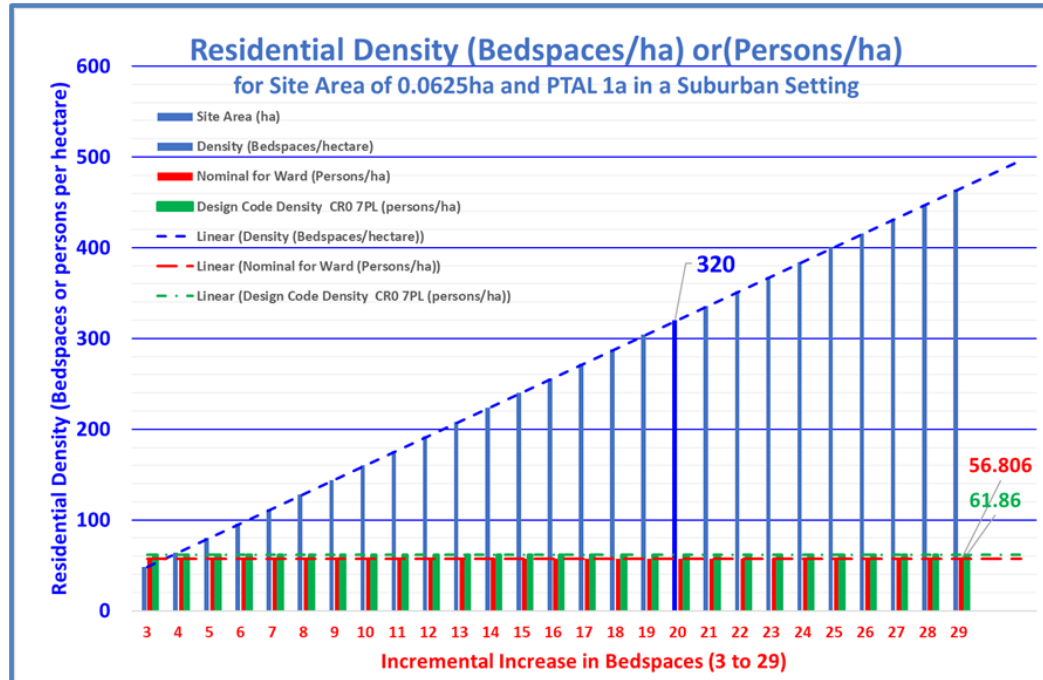
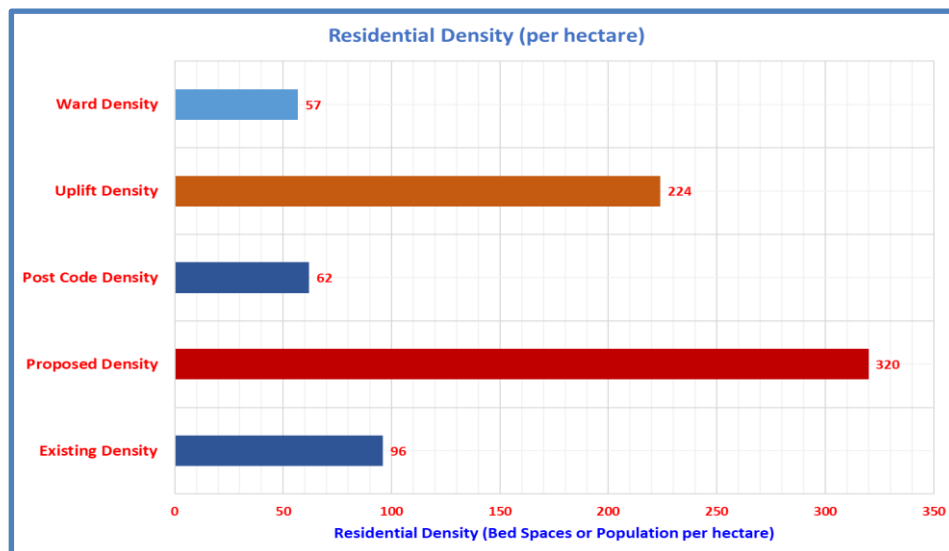


Illustration of Incremental Intensification (Bedspaces/ha) for Site Capacity of 0.0625ha in an outer (London) suburb or suburban setting.

- 5.11 Therefore, what is the appropriate level of *Residential Density* for “*Gentle Densification*” in a Location NOT appropriate for “*Incremental Intensification*” as defined by the *London Plan Policy H2 para 4.2.4* for this site of 0.0625ha in a suburban setting?



Comparison of Residential Densities in Bed Spaces or Population per hectare.

Representing, supporting and working with the local residents
for a better community

5.12 The **Residential Density** of **319.97 bed spaces or occupants per hectare** does NOT compare favourably with the **56.8 person per hectare** average for the **Ward (GLA data)** or **61.86 occupants per hectare** for the **Post Code Area**. *(The professional Planners don't seem to be concerned about people and their needs - just buildings!)*

5.13 We therefore request the Case Officer indicates the **assessment methodology** used to assess and define the **Housing** and **Residential 'Site Capacity'** for this proposed development, including the definition and evaluation of all support parameters used for this assessment **as required** of the **New London Plan Policies D1, D2, D3 and H4**.

6 London Plan Policy D3 - Monitoring density and 'site capacity'.

6.1 **London Plan (2021) Policy D3 Para 3.3.22 states:**

3.3.22 To help assess, monitor and compare development proposals **several measures of density are required to be provided by the applicant**. Density measures related to the **residential population** will be **relevant for infrastructure provision**, while measures of **density** related to the built form and massing will inform its integration with the surrounding context. The following measurements of **density** should be provided for all planning applications that include new residential units:

1. number of units per hectare
2. number of habitable rooms per hectare
3. number of bedrooms per hectare
4. number of bedspaces per hectare

6.2 These **"measurements of density"** **London Plan Policy D3 para 3.3.22 (items 1 through 4)** although required, **fail** to define any **methodology** to actually use these parameters to evaluate **'site capacity'** to define the acceptability or otherwise of Housing or Residential Densities. These parameters are **not mentioned** in the **London Plan (SPG's) - Modules A, B or C** ^[22] or **Policy H2 B**. ^[23]

6.3 The Residential **Population Density** of the **(Shirley North Ward)** as defined by the **GLA Data Set**, minus all the **Open Undeveloped Space** within the **Ward** gives a good indication of appropriate densities in the locality **'inappropriate'** for **"Incremental Intensification"** **as referenced in the London Plan Policy D3 para 3.3.22 & H2 para 4.2.4**.

7 'Transport for London' Connectivity Accessibility Assessment.

7.1 Sustainability Appraisal (SA) of the Croydon Local Plan Review - Interim SA Report December 2019. ^[24] Reference 11 States:

"Although the density matrix is not included within the draft London Plan (which anticipates higher densities in new development), it remains a useful proxy to estimate the potential housing capacity of sites."

^[22] <https://consult.london.gov.uk/good-quality-homes-for-all-londoners>

^[23] <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/london-plan-2021>

^[24] https://www.croydon.gov.uk/sites/default/files/articles/downloads/Croydon_Local_Plan%20Interim_SA_report.pdf?src=redirection-fix

QUITE! - So why was the Density Matrix dropped from the New London Plan? The replacement Policies are 'extremely complex and subjective and probably unenforceable' as the policies could NOT sustain defence of a legal challenge'.

- 7.2 As the **London Plan Policies D1, D2, D3 and H2** require LPAs to undertake Character Assessments and given that the Character Assessments of the current adopted Croydon Plan (2018) are *inadequate* (as established in the foregoing statements) and will probably not be completed prior to the adoption of the Local Plan Review estimated in 2022/23, we have investigated other possible options for infrastructure assessment of '*site capacity*' for comparison.
- 7.3 **Transport for London (TfL) Connectivity Assessment** (Section 2 Para 2.2) ^[25] recommends suburban Densities at Public Transport Accessibility Levels (PTAL) in the range 0 - 1 (this case "1a") to support a **Residential Density** of **150 to 200hr/ha** and **Housing Density** of **50 to 75 units/ha** at an average of **2.11 hr/unit**.
- 7.4 The PTAL at 13 Gladeside is PTAL '1a' and is forecast to remain at '1a' until at least 2031. The proposal has **Residential Density** of **303.98 hr/ha & 319.97 bedspaces/ha** and a **Housing Density** of **75.99 Units/ha**.
- 7.5 In order to analyse the available parameters, it is assumed the incremental increase of Density and PTAL is '*linear*' across the ranges; then Density within each range is given by the straight-line function: $y = mx + c$ where m = slope (rate of change $\Delta y/\Delta x$), x = PTAL and c = y when $x = 0$ at the y intercept.
- 7.6 At a suburban setting and PTAL 0 to 1 the **Residential Density** as recommended in the **TfL WebCAT Connectivity Assessment Guide** indicates **Residential Density** should be in the range of 150 to 200 hr/ha (at PTAL of 1a, significantly at the lower end).

Therefore:

$$\text{Residential Density} = y = mx + c \text{ where } m = \left(\frac{200-150}{1-0} \right) = 50$$

$$\text{Residential Density} = y = 50x + c \text{ where } x = \text{PTAL}$$

c is found by the known max and min equations:

$$200 = 50 * 1 + c \text{ and } 150 = 50 * 0 + c$$

$$\text{Therefore, } 350 = 50 + 2c : c = \frac{300}{2} : c = 150$$

A Residential Density of 303.98hr/ha then requires a PTAL of:

$$\text{Residential Density } 303.98 = 50x + 150 \text{ therefore } x = \text{PTAL} = 3.08$$

when this locality is only 1a

$$\text{Housing Density} = y = mx + c \text{ where } m = \left(\frac{75-50}{1-0} \right) = 25$$

$$\text{Housing Density} = y = 25x + c \text{ where } x = \text{PTAL}$$

c is found by the known max and min equations $75 = 25 * 0 + c$ & $50 = 25 * 1 + c$

$$125 = 25 + 2c \text{ therefore } c = \frac{125-25}{2} = c = 50$$

[25] <http://content.tfl.gov.uk/connectivity-assessment-guide.pdf>

A Housing Density of 95.99 Units/ha requires a PTAL of:

$Housing\ Density = y = 95.99 = 25x + 50$ therefore $x = PTAL = 1.834$

$Residential\ Density = y = 50 * 0 + 150$ then $y = 150\ hr/ha$ at PTAL 0

$Housing\ Density\ y = 25 * 0 + 50$ then $y = 50\ units/ha$ at PTAL 0

$Residential\ Density = y = 50 * 0.66 + 150$ then $y = 249\ hr/ha$ at PTAL 1a

$Housing\ Density = y = 25 * 0.66 + 50$ then $y = 66.5\ units/ha$ at PTAL 1a

- 7.7 The 'Site Capacity' would require a PTAL of 3.08 for a Residential Density of 303.98hr/ha and PTAL 1.834 for a Housing Density of 95.99 Units/ha when the actual and future PTAL is $1a \equiv 0.66$. This is not realistic when the **London Plan policy para 4.2.4** defines the "Incremental intensification" criteria for existing suburban residential areas are required to be within PTALs 3-6 or within 800m distance of a train or tram station or within 800m of town centre boundary (or interpreted as a District Centre) which supports our assessment that the locality of this proposal is 'inappropriate' for "incremental intensification" and is an over development for the 'Site Capacity'.

- 7.8 This analysis using the TfL WebCAT ^[26] takes account of locality Setting (Character), Housing Density and Residential Density, its Site Area and the local Public Transport Accessibility (i.e., all the appropriate parameters to define 'Site Capacity') and supports our earlier assessment that this proposal is an over-development for the locality based upon the London Plan definition of areas 'inappropriate' for 'incremental intensification'.

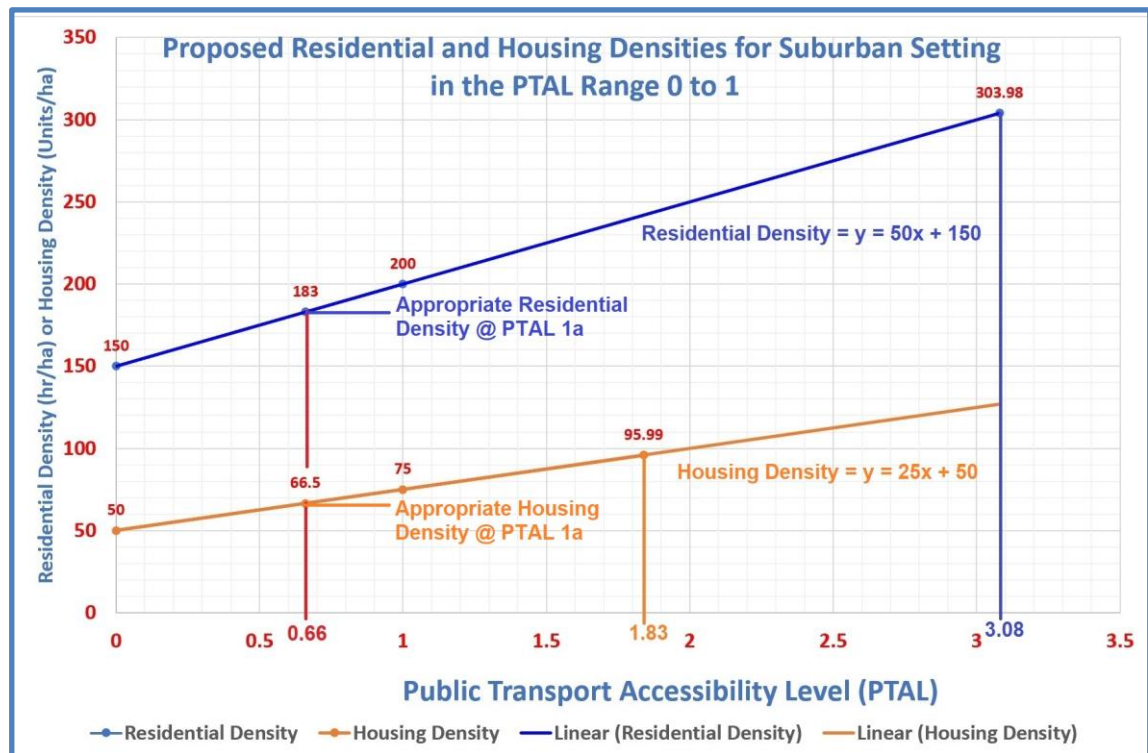


Illustration of Calculations of proposed development Residential and Housing Densities at PTAL 0 using the TfL WebCAT Connectivity Assessment Guide.

[26] <http://content.tfl.gov.uk/connectivity-assessment-guide.pdf>

8 London Plan Policy H2 Small sites:

- 8.1 A Boroughs should pro-actively support well-designed new homes on small sites (below 0.26 hectares in size) through both **planning decisions** and **plan-making**.

*“4.2.6 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, **redevelopment**, extensions of houses and/or ancillary residential buildings.”*

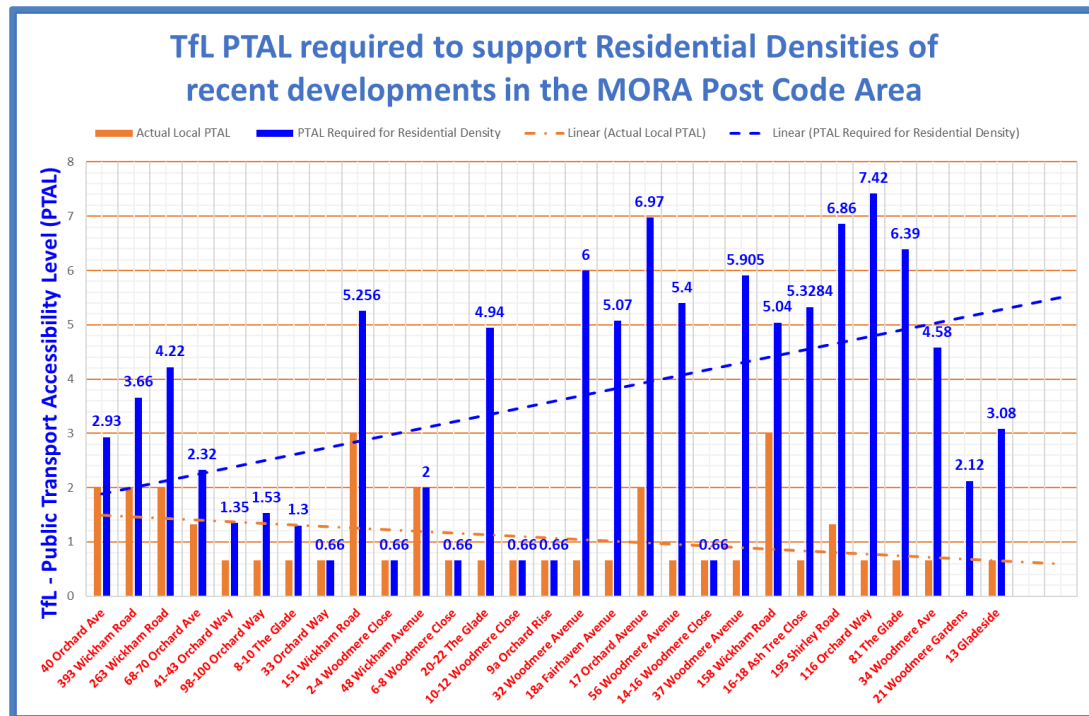
- 8.2 **NO IT DOES NOT** represent a small amount of the potential for intensification in existing residential areas, particularly in our Shirley North Ward! In our MORA area, Small Site development represents a significant ‘**intensification**’ (see Histogram below) ^[27] based upon TfL WebCAT analysis. There is no quantifiable definition of “**gentle Densification**” or “**Gradual, Moderate Incremental Densification**”. Thus, all these Policies are very *subjective, vague* and *inadequately* defined for any **professional** assessment. The assessment is at the subjective prejudicial whim of Case Officers.
- 8.3 It can however be logically assumed that “**Gentle Densification**” or “**Gradual, Moderate Incremental Densification**” (Undefined) would have an appreciably ‘**discernible**’ reduction of Density than those categories listed in **Croydon Local Plan Table 6.4 - Accommodating Growth**.

9 Year-on-year cumulative windfall redevelopments

- 9.1 Year-on-year cumulative windfall and redevelopments in the **Shirley North Ward** has **unsustainable** supporting infrastructure and access to public transport required for social cohesion from the new occupants of recent developments (see Histogram below) as there is no mechanism to manage the requirements of additional occupants of multiple **cumulative** high-density year-on-year developments as they are all **assessed individually**. Case Officers do not challenge cumulative effects of development proposals.
- 9.2 The MORA Post Code Area has seen significant ‘**cumulative developments**’ since 2016 representing a **significant increased intensification** (see Histogram 4 below) with absolutely no improvement in **Public Transport Accessibility** as based upon **TfL WebCAT** analysis or any improvement to other supporting services infrastructure.
- 9.3 The recent cumulative developments in the MORA post code area (See Histogram below) including this proposed development application have and will all have contributed to the ‘**Community Infrastructure Levy**’ none of which has so far been visibly spent in the MORA area to improve the **Public Transport Accessibility** to

[27] <http://www.mo-ra.co/planning/planning-matrix/>

support these increases in local **Residential Densities**. It also provides evidence that the Croydon LPA have **“ignored”** the previous adopted **London Plan Policy 3.4 – Optimising Housing Potential**, since 2016.



Recent Year-on-Year Cumulative Windfall Redevelopments.

10 London Plan Policy D6 Housing quality and standards

- 10.1 The proposal meets most accommodation standards as defined by the **New London Plan (2021)** except that the proposal does **NOT** appear to provide adequate **‘In-Built’ Storage capacities** that are appropriate for the storage of the normal living clutter requirements for future occupants as defined in the **New London Plan (2021) Table 3.1**. These are **‘Minimum’ Accommodation Space Standards** which, in addition, the London Plan recommends that **“these minimum standards should be exceeded if at all possible”**. It is **unacceptable** that this requirement is not fully met and gives further evidence of **over-development**.

11 Play Space for Children

- 11.1 The number of Children of the **Flats 1 to 6** would probably be around **8** which according to the London Plan requires **10m²** play space per child = **80m²**. The communal open space area dimensions are not provided on the plans or provided in the Design and Access Statement.
- 11.2 The **Play Area** is a circular area of diameter **≈5m** as measured off the supplied drawings, within the communal grounds. This gives a total Play Space Area of **19.635m²** which is deficient by **60.365m²** to the **London Plan** requirement. This is further evidence of **over development** of the site. **There is NO Policy to determine appropriate Communal Open Space per occupier**, another omission of the supposedly professional Standards.

12 Residential Parking.

- 12.1 The proposed development provides **four** parking bays for the **six** dwellings and probably **12 adults**, one of whom is likely for a **disabled** occupier. There is no disabled parking for this occupant of **Flat 2**.
- 12.2 A Swept path diagram should be provided for ingress and egress to/from Bay 1 (nearest the building), when all other bays are occupied, to prove acceptable ingress and egress from that bay as it is likely to be an extremely difficult manoeuvre.
- 12.3 Gladeside has a number of blind bends, and any on-street parking creates hazards for other road users. With only 4 Parking Spaces provided, the proposed development will likely require overnight on-street parking for at least two vehicles in the neighbouring street.



12.4 Dual electric charging points are provided for the two bays closest to the proposed development with two separate charging points for the two distant bays.

12.5 As car or van (business purposes) ownership is likely to require a minimum of six cars there is likely to be at least two overspill night time parking in adjacent streets.

12.6 The ground floor Flat 2 is to M4(3) Wheelchair user accommodation Building Regulation standard but there is **NO** Disabled Car Parking provision within the 4 allocated spaces for that occupant.

12.7 Gladeside has blind bends and any additional on-street parking reduce the road

width available to other road users and would cause additional hazards.

13 Housing Targets

- 13.1 One of the reasons for Case Officers approving '**suspect**' development proposals is the stated "**compelling need for more homes**" for which The London Plan and the Croydon Plan and the Croydon Local Plan Review have published '**housing targets**' for the Places of Croydon to meet this "**need**".
- 13.2 The London Plan's proposed **10-year** windfall and redevelopment targets for Croydon are given in **Policy H2 Small sites at Table 4.2 - 10-year targets (2019/20 - 2028/29)** for Net housing completions on small sites (below 0.26 hectares) in size and for Croydon is stated to be **6,410 units** – which equates to **641 dwellings per year** for the '**whole of Croydon**' over the **Planned period 2019/20 to 2028/29**.

13.3 Croydon Plan Review (2019):

13.3.1 The Targets for new dwellings over the period 2019 to 2039 are set out in The [Strategic Forecast](#) for the Croydon Local Plan Review (2019-2039) which gives the target for the whole of the [‘Shirley Place’](#) at between 360 to 460 units spread over the 20 years of the Plan, giving yearly targets of 18 to 23 units year-on-year.

13.3.2 This is an average of 20.6 dwellings per year for the life of the plan and can be seen in the LPA’s published (2019) Croydon Local Plan Review – Issues and Options, “where it clearly states, “Homes by Place (2019-2039)””; including the [‘Shirley Place’](#) (which includes both the [Shirley North](#) and [Shirley South Wards](#)). i.e., targets Broken down by [“Place”](#) not by [Ward](#).

Croydon Plan Review 2019 - 2039 (at 2019)	
Homes by Place (2019 2039)	
Place	Total
Addington	280 to 350
Addiscombe	1,480 to 1,880
Broad Green & Selhurst	880 to 1,070
Coulsdon	2,050 to 2,490
Central Croydon	11,540 to 12,980
Crystal Palace & Upper Norwood	480 to 670
Kenley and Old Coulsdon	2,000 to 2,480
Norbury	540 to 670
Purley	7,260 to 9,390
Purley Way transformation area	2,900 to 4,470
Sanderstead	1,670 to 2,070
Selsdon	870 to 1,070
Shirley	360 to 460
South Croydon	890 to 1,070
South Norwood & Woodside	560 to 620
Thornton Heath	1,450 to 1,880
Waddon	500 to 610
Already under construction	5,370
Borough totals	At least 46,040 new homes across the borough

13.3.3 The MORA Post Code area application approvals for 2019 as shown in the tables below have provided an additional 48 dwellings which is over double the yearly quota for the whole of the [‘Shirley Place’](#) at an average of 20.6 dwellings per year. For 2020 it is 21 dwellings and so far for 2021 it is 32 dwellings, including this application.

13.3.4 The [Monks Orchard Residents’ Association \(MORA\)](#) monitors only our MORA Post Code Area for planning applications which is only a part of the Shirley North Ward, ^[28] (after the Ward boundary changes) so the MORA area is only an exceedingly small portion of the [‘Shirley Place’](#) as defined by the Croydon Local Plan yet has contributed over double the target for the whole of the Shirley “Place”.

13.3.5 The cumulative average estimated over the two years is $(48 + 23 + 35)/(2+8/12) = 39.75$ per year (up to end August 2021) which is for just the [MORA post code area](#), a 93% increase above the 20.6 yearly target for the [Shirley Place](#).

13.3.6 This clearly shows cumulative dwellings significantly exceed the strategic target defined in the Local Plan Review of 20.6 dwellings average per year.

[28] <http://www.mo-ra.co/about/area/>

13.3.7 The MORA Post Code Area applications approvals and waiting approval for 2019 to 2021 dwellings are as shown in the Tables below.

13.3.8 The 2021 number of planned dwellings in the MORA Post Code Area has already exceeded the Target for the Shirley Place!

Location	Reference No.	Approval Date	Existing Dwellings	New Dwellings	Overall Increase
20-22 The Glade	18/05928/FUL	01/02/19	0	2	2
10-12 Woodmere Close	19/00051/FUL	27/02/19	0	1	1
9a Orchard Rise	18/06070/FUL	21/03/19	1	9	8
32 Woodmere Avenue	19/00783/FUL	20/06/19	1	7	6
18a Fairhaven Avenue	19/01761/FUL	20/06/19	1	9	8
17 Orchard Avenue	19/00131/FUL	06/11/19	1	8	7
56 Woodmere Avenue	19/01352/FUL	24/10/19	1	9	8
14-16 Woodmere Close	19/01484/FUL	23/10/19	0	1	1
37 Woodmere Avenue	19/03064/FUL	26/09/19	1	8	7
Totals			6	54	48

Location	Reference No.	Approval Date	Existing Dwellings	New Dwellings	Overall Increase
151 Wickham Road	19/04149/FUL	18/03/2020	0	5	5
16-18 Ash Tree Close	19/04705/FUL	27/02/2020	2	8	6
174 The Glade	20/01968/FUL	27/07/2020	1	2	1
116 Orchard Way	20/05960/FUL	12/05/2020	1	4	3
195 Shirley Road	19/06037/FUL	22/09/2020	1	9	8
			5	28	23

Location	Reference No.	Approval Date	Existing Dwellings	New Dwellings	Overall Increase
116 Orchard Way	20/05960/FUL	12/05/21	1	4	3
81 The Glade	21/00108/FUL	Waiting	1	9	8
34 Woodmere Avenue	21/02212/FUL	Waiting	1	6	5
21 Woodmere Gardens	21/03702/FUL	Waiting	1	9	8
75 Shirley Avenue	21/02622/FUL	Waiting	1	4	3
13 Gladeside	21/03518/FUL	Waiting	1	6	5
			6	38	32

Recent Developments in the MORA Post Code Area

13.3.9 The recent cumulative developments in the MORA post code area (See also histogram above) have all contributed to the 'Community Infrastructure Levy' none of which has been visibly spent in the MORA area to improve the Public Transport Accessibility to support these increases in local Residential Densities.

13.3.10 Thus, any statements by the case officer inferring "an acute need for new homes" would be considered extremely 'disingenuous' for the Shirley North Ward, giving inaccurate and inappropriate, guidance to the planning committee members for their determination of the proposal – as the pressure to meet housing 'need' in the MORA area has been categorically satisfied by over-provision of the strategic targets.

Why have these targets if they are not observed and are meaningless?

13.3.11

NPPF Para 14 states:

“In situations where the presumption (at paragraph 11d) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided all of the following apply ^[29]:

b) the neighbourhood plan contains policies and allocations to meet its identified housing requirement;

c) the local planning authority has at least a three-year supply of deliverable housing sites (against its five-year housing supply requirement, including the appropriate buffer as set out in paragraph 73); and

d) the local planning authority’s housing delivery was at least 45% of that required ^[30] over the previous three years.”

We have clearly shown that **Shirley North** has already met its housing targets for the last three years so has met the housing **“need”** for the locality.

14 Summary and Conclusions:

- 14.1 This proposed Development would result in the loss of a family home with garden.
- 14.2 The proposal has inadequate **in-built storage** for the future occupants which is an indication of **overdevelopment** as the Developer is attempting to squeeze as much as possible into a limited site area which does not allow the minimum internal space standards to be implemented.
- 14.3 Built in Wardrobes are excluded from the minimum standard (but contribute to GIA). The London Plan suggests these space standards are a **‘minimum’** and should be exceeded, if at all possible, which means reducing the densities accordingly such that all space standards can be generously met within the **site capacity**.
- 14.4 The proposal does NOT provide adequate **Play Space** for the children of the future occupants of the development for the life of the development. The London Plan require **10m² per child** and the probable number of children would be **8** requiring **80m²** Play Space Area. This is another indication of overdevelopment as the **‘Site Capacity’** does not allow this requirement to be met.
- 14.5 The ground floor **Flat 2** is to **M4(3) Wheelchair** user accommodation Building Regulation standard but there is **NO Disabled Car Parking** provision within the **4** allocated spaces.
- 14.6 The most contentious issue raised by local residents is **‘over-development’** of the sites. The current adopted Croydon Plan does NOT provide any methodology to determine individual locality **“Site Capacities”**, **“Character Assessments”** or **“Design Codes”** of sufficient detail (for localities within the Places of Croydon), to

^[29] Transitional arrangements are set out in NPPF Annex 1.

^[30] Assessed against the Housing Delivery Test, from November 2018 onwards.

assess an applications' Local '*Site Capacity*' in accordance with the new **London Plan (2021) Policy D3 and H2**.

- 14.7 Recognising the foregoing, and acknowledging that the adopted **Croydon Local Plan** is '*inadequate*' in specifying meaningful '*growth*' definitions or to implement the **New London Plan Policies D1, D2, D3, D4 and H2**, Planning Officers must therefore make an assessment, based upon the **current and future** known '*public transport accessibility*' with other available '*services infrastructure*', '*Local Character*' and '*Site Capacity*' to estimate an appropriate level of **Residential and Housing Densities** for **Sustainable Development** ^[31] within the available existing parameters, without '*cognitive dissonance*', as there is no prospect of local supporting infrastructure improvements in the locality over the lifetime of these Plans.
- 14.8 The objective of the New London Plan is to provide housing to the highest quality whilst "*optimising site capacity*" to meet the ambitious targets and address housing '*need*' while maintaining good external and internal design, *which is quite different from optimising a single dwelling's site capacity to provide as many units as possible (6 in this case), that can be squeezed onto a site to maximise profit at the expense of supporting a 'Sustainable Development Site Capacity'*.
- 14.9 This proposal does NOT provide an appropriate acceptable value for "*gentle densification*" or "*Gradual, Moderate Incremental Densification*" as assessed according to the London Plan definition for "*Incremental intensification*" over and above that of the existing locality for a suburban area of **PTAL 1a** (Less than 3 to 6) and at greater than **800m** from a **train/tram station** and greater than **800m** from a **District Centre**.
- 14.10 We have assessed this proposal using as much evidence as available which is appropriate for evaluation. The **Croydon Local Plan Review** is not produced concurrently with the new revisions of the **London Plan** Policies and therefore the adopted **Croydon Plan** does NOT include the requirements to implement the New London Plan '*Design-Led-Approach*' Policies. We have used the **NPPF** references and the **National Design Guide** and **National Model Design Code** where appropriate.
- 14.11 The **NPPF National Model Design Code 2B** ^[32] indicates **Housing Density** for Outer Suburb to be in the range **20 to 40 Units per hectare** and **Suburban** localities should be within the range **40 to 60 units per hectare**. As the **Shirley North Ward** is located within the **Outer London Borough of Croydon**, the area could be considered as "*Outer Suburban*".
- 14.12 This proposal should tend toward the lower limits of '*Outer Suburban*' (we are in **Outer London Suburbs**) at **20 Units per hectare** or '*Suburban*' of **40 u/ha** as the **PTAL is 1a** and at a housing density of **78.38 Units per hectare** which exceeds the Guide maximum of **60** by **30.6333%** should therefore be refused as inappropriate for the locality.

[31] <https://www.legislation.gov.uk/ukpga/2004/5/section/39>

[32]

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/957205/National_Model_Design_Code.pdf

- 14.13 The **NPPF National Model Design Code 'Built Form'** indicates that the **Floor Area Ratio (FAR)** in a suburban setting should be **<0.5 (less than)** whereas the **Floor Area Ratio (FAR)** for this proposed development has offered **GIA of 408.2m²** and Site Area of **625.05m² = 0.653 (FAR)** and should therefore be refused as it is **>0.5 (greater than)** and thus inappropriate for the locality.
- 14.14 We have clearly established that both the **New London Plan** and the current **Croydon Local Plan** is **'devoid'** of any defined policies to determine either acceptable or unacceptable **'growth'** of any proposals with regard to the **'Site Capacity'** and the available infrastructure for **sustainable Densities** ^[33] which means the Policies are **'unenforceable'** and **'undeliverable'** which also means the LPA is not meeting its Statutory obligations to ensure Development Proposals are **Sustainable Developments**. ^[34]
- 14.15 All the foregoing reasoning confirms this proposal is an **over development** of the site at this location bearing in mind that recent cumulative developments have already placed significant strain on the available supporting infrastructure such that there is now inadequate infrastructure to support this and the previous developments when completed and fully occupied, it is recognised that there is no planned improvement in **Public Transport Accessibility** in the foreseeable future for the **Shirley North Ward**.
- 14.16 It can however be logically assumed that **"Gentle Densification"** or **"Gradual, Moderate Incremental Densification"** (all undefined) in an area **"inappropriate"** for **"incremental intensification"** (**London Plan Policy para 4.2.4**) would have an appreciably **'discernible'** reduction in Density than those localities designated and listed in **Croydon Local Plan (2018) Table 6.4 – "Accommodating Growth"**.
- 14.17 The Planning Committee emphasise the **"compelling need for more homes"** for which appropriate **targets** have been identified. However, the pressure to meet housing **'need'** in the MORA area has been **categorically satisfied by over-provision of the established strategic targets** for the **Shirley Place**. It would therefore be inappropriate to quote this **'need'** as a significant reason to approve this application as the identified **'need'** has been **more than met** within the **Shirley North Ward** to meet the whole **Shirley Place Targets**. Or alternatively, explain why the **Shirley North Ward** should **exceed the strategic quota**. ^[35]
- 14.18 We have clearly established that both the **New London Plan** and the current **Croydon Local Plan** is **'devoid'** of any defined policies to determine either acceptable or unacceptable **'growth'** of any proposals with regard to the **'Site Capacity'** and the available infrastructure for **sustainable Densities** ^[36] which means

^[33] This is a legal requirement of Local Planning Authorities exercising their plan-making functions (section 39(2) of the Planning and Compulsory Purchase Act 2004).

^[34] <https://www.legislation.gov.uk/ukxi/2015/595/article/39/made>

^[35] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf See: NPPF Paras 60 & 61.

^[36] This is a legal requirement of Local Planning Authorities exercising their plan-making functions (section 39(2) of the Planning and Compulsory Purchase Act 2004).

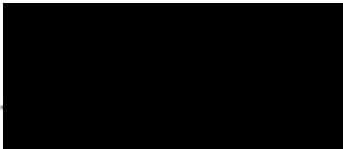


the Policies are **'unenforceable'** and **'undeliverable'** which also means the LPA is not meeting its Statutory obligations to ensure Development Proposals are **Sustainable Developments**.

- 14.19 Gladeside has blind bends and any additional on-street parking reduce the road width available to other road users and would cause additional hazards.
- 14.20 It is likely the at least 2 on-street overspill overnight parking will be required.
- 14.21 Swept path diagram should be provided for Bay 1 (nearest the building) to prove acceptable ingress and egress from that bay as it is likely to be a difficult manoeuvre.
- 14.22 The proposal would result in the loss of a family home with generous garden space.
- 14.23 An approval of this Development Proposal would make a **'mockery'** of all the **NPPF Policies, Design Code Guidance** and **London Plan Policies** referenced in this submission.

Kind regards

Derek



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Cc:

Sarah Jones MP
Nicola Townsend
Cllr. Sue Bennett Cllr. Gareth
Streeter Cllr. Richard Chatterjee

Bcc:

MORA Executive Committee
Local affected Residents
Interested Parties

Croydon Central
Head of Development Management
Shirley North Ward
Shirley North Ward
Shirley North Ward