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## Monks Orchard Residents' Association Planning

13<sup>th</sup> December 2021

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Reference: 21/05741/FUL  
Application Received: Tue 16 Nov 2021  
Application Validated: Tue 16 Nov 2021  
Address: 46 The Glade Croydon CR0 7QD  
Proposal: Demolition of a single storey dwelling and redevelopment with a new building to provide 9 dwellings (Class C3), with associated amenity space, integral refuse, cycle stores and external car parking.  
Status: Awaiting decision  
Consultation Expiry: Thu 23 Dec 2021  
Determination: Tue 11 Jan 2022  
Case Officer: Christopher Grace

Dear Mr Grace

Please accept this letter as a formal objection to **Application Ref: 21/05741/FUL** for Demolition of an existing two bedroomed four-person bungalow with assumed 4 habitable rooms and presumably 4 bedspaces equating to a Housing Density of **≈9.80Units/ha** and a Residential Density of **≈39.22hr/ha or ≈39.22bs/ha** in a **PTAL of Zero at 46 The Glade**, with a new building of 9 dwellings (Class C3), with associated amenity space, integral refuse, cycle stores and external car parking.

We understand the need for additional housing, but that new housing developments and Residential Extensions & Alterations must be **sustainable** and meet the current and emerging planning policies to ensure future occupants have acceptable living standards and acceptable accessibility to Infrastructure and Public Transport.

## 1 The Proposed Parameters:

46 The Glade			Ref: 21/05741/FUL												
Post Code CR0 7QD Population			68	Dwellings	28	Residential Density (hr/ha)		313.73	Floor Area Ratio		0.6958	39.16%	PTAL 2011	Zero	
Units	Site Area	1020 sq.m.	Post Code	CR0 7QD	Residential Density (bs/ha)		313.73	Post Code Density		18.54	Units/ha	PTAL 2031	Zero		
9	Site Area	0.102 ha			Housing Density (U/ha)		88.24	Area Post Code CR0 7QD		1.51	ha				
Dwelling	Type	Bedrooms	Bedspaces	Habitable Rooms	Functional Areas	GIA offered	GIA Required	Built-In Storage Offered	Amenity Space Offered	Amenity Space Required	Car Parking	Probable Adults	Probable Children	Play Space Offered	
Flat 1	M4(3)	3	4	4	6	86.0	74.0	Not Stated	Private Gdn	7	6	Disabled	2	2	4.60
Flat 2	M4(2)	3	4	4	6	86.0	74.0	Not Stated	Private Gdn	7			2	2	4.60
Flat 3	M4(2)	2	3	3	5	73.8	61.0	Not Stated	7.00	6			2	1	1.20
Flat 4	M4(2)	2	3	3	5	64.0	61.0	Not Stated	7.00	6			2	1	1.20
Flat 5	M4(2)	2	4	3	5	79.4	70.0	Not Stated	7.37	7			2	2	1.20
Flat 6	M4(2)	2	3	4	6	73.0	61.0	Not Stated	7.00	6			2	1	1.20
Flat 7	M4(2)	2	3	4	6	64.3	61.0	Not Stated	7.00	6			2	1	1.20
Flat 8	M4(2)	2	4	4	6	77.9	61.0	Not Stated	7.37	6			2	1	1.20
Flat 9	M4(2)	2	4	3	5	105.3	70.0	Not Stated	7.00	7			2	2	1.20

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## **Front & Rear Elevations Proposed Development**

- 1.1 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.
- 1.2 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)
  - Supplementary Planning Guidance (SPD2) (April 2019).

## **Evidence for a refusal.**

### **2 The NPPF.**

#### **2.1 The NPPF para 129 states:**

*“129. Design guides and codes can be prepared at an area-wide, neighbourhood or site-specific scale, and to carry weight in decision-making should be produced either as part of a plan or as supplementary planning documents. Landowners and developers may contribute to these exercises, but may also choose to prepare design codes in support of a planning application for sites they wish to develop. Whoever prepares them, all guides and codes should be based on effective community engagement and reflect local aspirations for the development of their area, taking into account the guidance contained in the National Design Guide<sup>1</sup> and the National Model Design Code<sup>2</sup>.”*

**These national documents should be used to guide decisions on applications in the absence of locally produced design guides or design codes.”**

<sup>1</sup>

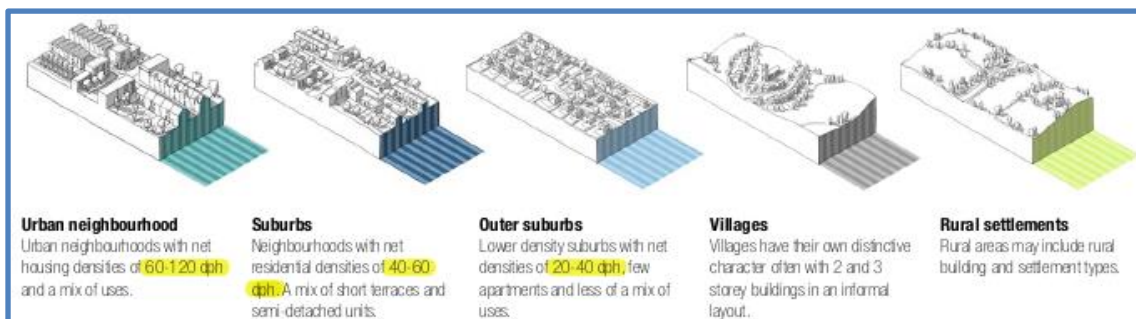
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1009795/NMDC\\_Part\\_2\\_Guidance\\_Notes.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1009795/NMDC_Part_2_Guidance_Notes.pdf)

<sup>2</sup>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1009793/NMDC\\_Part\\_1\\_The\\_Coding\\_Process.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1009793/NMDC_Part_1_The_Coding_Process.pdf)

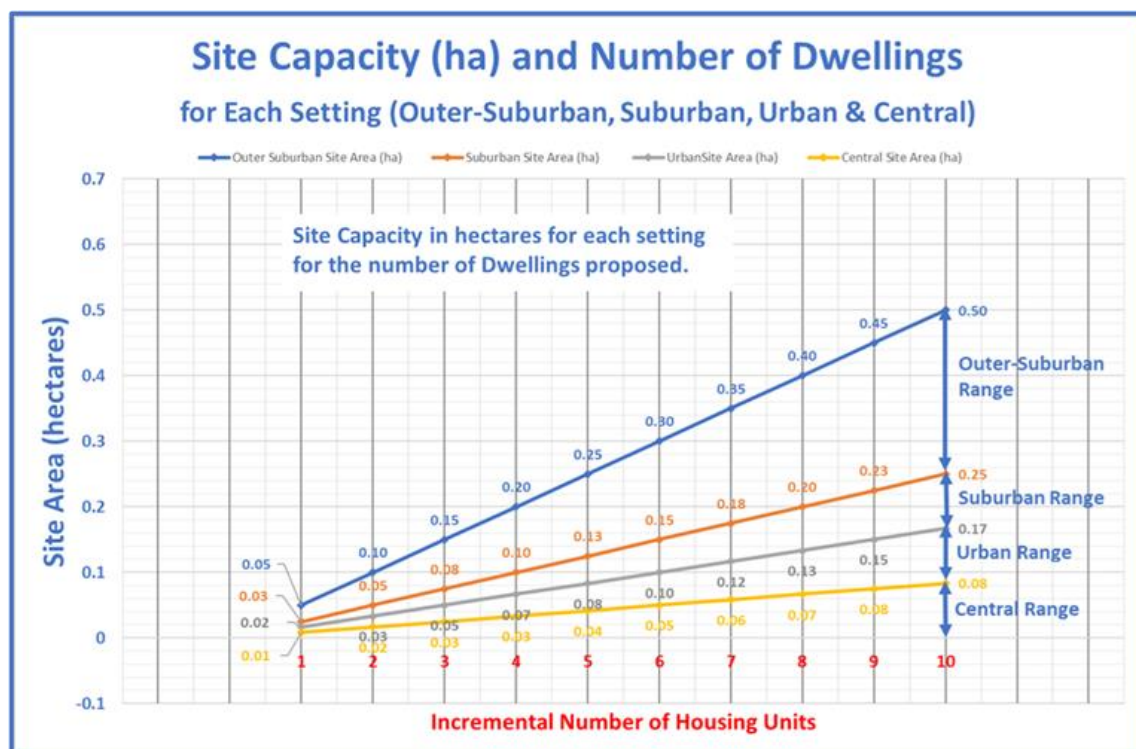
## 2.2 The LUHC National Model Design Code & Guidance<sup>3</sup> Pts 1 & 2.

2.2.1 The 'Settings', 'Outer Suburban', 'Suburban', 'Urban' and 'Central' are defined in the **National Model Design Code Part 1 The Coding Process, 2B Coding Plan, Figure 10** Page 14.



### The National Model Design Code Parameters Definitions for Local Settings.

2.2.2 Site Capacities (Units/hectare):



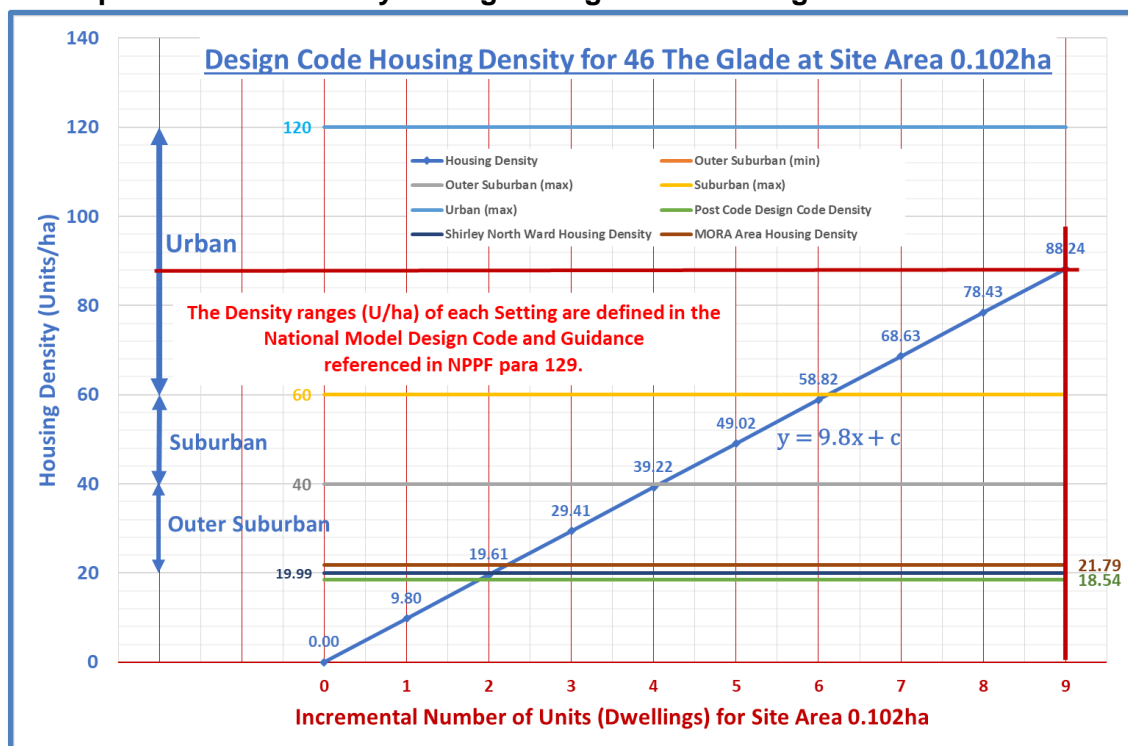
**Graphical Illustration of Site Area Capacity ranges (ha) for Number of Units at each Setting, Outer-Suburban, Suburban, Urban and Central for 1 to 10 Units.**

Units (Dwellings)	1	2	3	4	5	6	7	8	9	10
Outer Suburban (max Site Area ha)	0.05	0.10	0.15	0.20	0.25	0.30	0.35	0.40	0.45	0.50
Outer Suburban (min Site Area ha)	0.03	0.05	0.08	0.10	0.13	0.15	0.18	0.20	0.23	0.25
Suburban (max Site Area ha)	0.03	0.05	0.08	0.10	0.13	0.15	0.18	0.20	0.23	0.25
Suburban (min Site Area ha)	0.02	0.03	0.05	0.07	0.08	0.10	0.12	0.13	0.15	0.17
Urban (max Site Area ha)	0.02	0.03	0.05	0.07	0.08	0.10	0.12	0.13	0.15	0.17
Urban (min Site Area ha)	0.01	0.02	0.03	0.03	0.04	0.05	0.06	0.07	0.08	0.08
Central (max Site Area ha)	0.01	0.02	0.03	0.03	0.04	0.05	0.06	0.07	0.08	0.08

**Table of Site Capacities at Design Code Settings.**

<sup>3</sup> <https://www.gov.uk/government/publications/national-model-design-code>

- 2.2.3 The above Graphical illustration and Table provides the ranges of **'Site Capacities'** (ha) in terms of the number of dwellings and Site Area (ha) for each of the **'Settings'** – 'Outer-Suburban', 'Suburban', 'Urban' and 'Central' as defined by the Department of LUHC National Model Design Code & Guidance Parts 1 & 2 <sup>3</sup>.
- 2.2.4 As indicated in **NPPF para 129**, in the **"absence"** of locally produced **Design Guides** or **Design Codes** in the current **Croydon Local Plan (2018)** or the **Draft Revised Local Plan**, the **'Settings'** defined in the **National Documents** should be used to **"guide decisions on applications"**.
- 2.2.5 The graphical illustration below plots the **Design Code Housing Density** (Units/ha) over the range 0 to 9 dwellings for **46 The Glade**, against various examples of **Design Codes of the local Areas** to show that the prevailing **Design Code 'Setting'** for the locality is **well within** the prescribed parameters for **"Outer Suburban"** (or **Outer London Suburban**) **Setting**. **Shirley is definitely NOT Urban** as defined in the current adopted Local Plan, the Shirley **"Place."** At **88.24 Units/ha** this proposal is clearly an over development for the locality average Design Code Setting of 'Outer Suburban'.



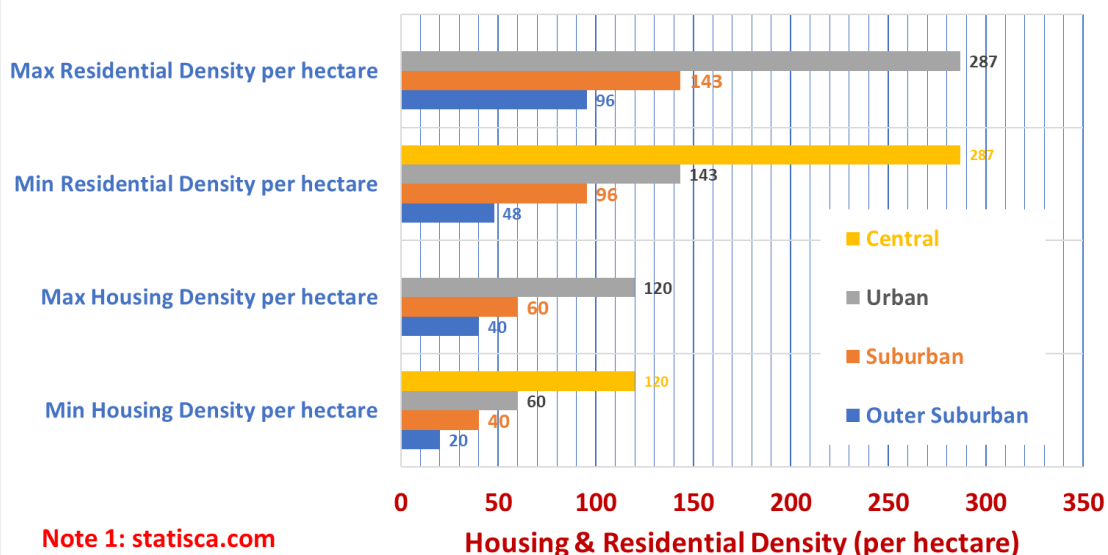
**Illustration of Design Code evaluation of 'Settings' at Local Area for 46 The Glade with Site area of 0.102hectares at PTAL Zero**

- 2.2.6 It is people who require supporting infrastructure, NOT Dwellings, so we need to establish equivalent Residential Densities ranges for the 'Settings'. This can be achieved using the Office of National Statistic's data and Statista<sup>4</sup> data. In 2020, the average number of people per household in the United Kingdom was 2.39 compared with 2.37 in the previous year. We can use this as a factor to convert equivalent Units/ha to Bedspaces/ha as shown in the following Graphical illustration.

<sup>4</sup> <https://www.statista.com/statistics/295551/average-household-size-in-the-uk/>

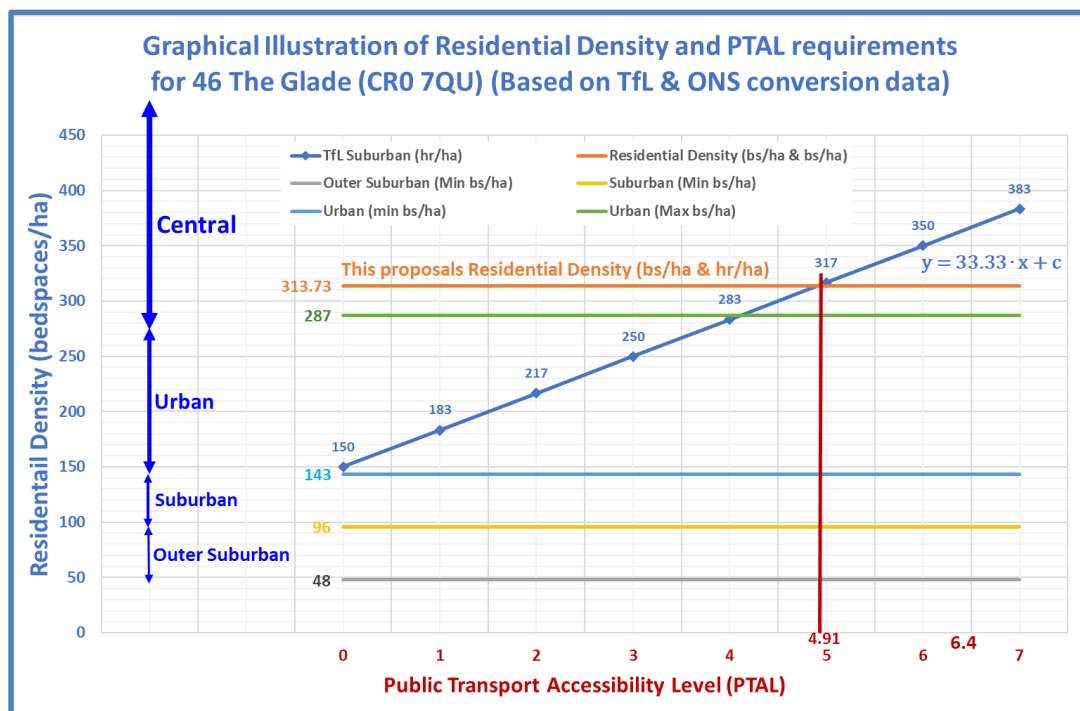


### Housing & Residential Densities per hectare for Settings Defined in the National Model Design Code (Statista<sup>1</sup>).



### Housing Densities and equivalent Residential Densities for each of the National Model Design Code Settings

- 2.2.7 Using this data, and TfL Connectivity data, we can plot and illustrate the required Settings for this proposed **Residential Density** in hr/ha and bedspaces/hectare which gives an estimated relationship between **Residential Density** and **PTAL** for each of the 'Settings'.



### Residential Densities using TfL and ONS conversion data relating to the National Model Design Code Settings

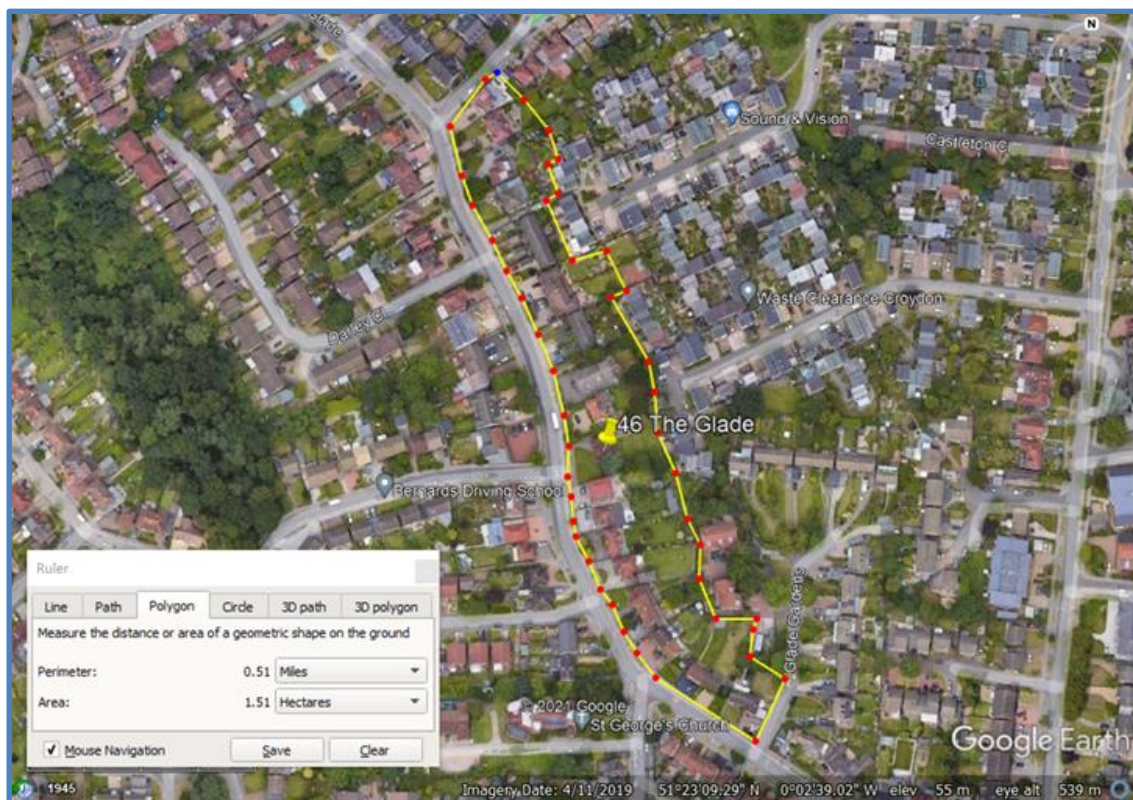
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2.2.8 The evaluation of this proposal places **46 The Glade** with **9 dwellings** of Housing Density at **88.24Units/ha** clearly within the mid-range of an **'Urban'** **'Setting'** whereas the **locality** by the various local **Area evaluations** is well within or even below the **Outer-Suburban Design Code 'Setting'**. Additionally, at a Residential Density of **313.73 Bedspaces/ha** at a **'Central' Setting (even worse)** when the actual Setting is **'Outer Suburban'**. This clearly shows the **'Site Capacity'** of **0.102ha** is extremely overdeveloped at 9 dwellings. **Shirley is clearly not 'Urban' and definitely not 'Central' as proved by these assessments:**

2.2.9 As there is NO guidance in the Current Local Plan or the Revised draft Local Plan, we are using the guidance provided in NPPF at Para 129 in that the National Model Design Code and Guidance to guide decisions on applications, **"in the absence of locally produced design guides or design codes"**.

Design Code Area	Area (ha)	Population	Dwellings	Housing Density (Units/ha)	Residential Density bs/ha	Setting (as defined by the National Model Design Code)
Shirley North Ward	327.9	15666	6555	19.99	47.78	< Outer Suburban
Shirley South Ward	387.3	14147	5919	15.28	36.53	< Outer Suburban
Shirley	715.2	29814	12474	17.44	41.69	< Outer Suburban
Post Code CR0 7QD	1.51	68	28	18.54	45.03	< Outer Suburban
MORA Area	178.26	9283	3884	21.79	52.07	Outer Suburban
Average for the Locality	322.03	13795.59	5772.12	18.61	42.84	< Outer Suburban
New Development at 46 The Glade	0.102	32	9	88.24	313.73	Urban
Percentage above average	(This cannot be considered a moderate or gentle incremental increase)			374.14%	632.34%	This clearly is NOT Moderate or Gentle Intensification!

### Analysis of Local Settings (Using various available sources of data)



**Post Code CRO 7QU ≈ Area in hectares as measured using Google Earth.**

- 2.2.10 Clearly, the **Site Area of 0.102ha** has limited **Unit Capacity** at this **Setting** for between **4 and 6 dwellings**. As given by the *simple* linear function:

$y = \frac{\delta y}{\delta x} \cdot x + c$  where  $y$  = Site Area,  $\frac{\delta y}{\delta x}$  = rate of change of  $y$  wrt  $x$ , and  $x$  = Incremental number of Housing Units and  $c$  =  $y$  when  $x = 0$  (intersection on the  $y$  axis).

Therefore  $y = \frac{88.24}{9} \cdot x + c$  where  $y$  = *Housing Density* ( $\frac{\text{units}}{\text{ha}}$ ),  $x$  = *Units* &  $c = 0$

Therefore, the Maximum number of Housing Units for this Site of **0.102ha** at **Outer Suburban Setting** is:  $40 = \frac{88.24}{9} \cdot x$  therefore,  $x = 4.0798 \equiv$  **4 Units**

And **Suburban Setting** is:  $60 = \frac{88.24}{9} \cdot x$  therefore,  $x = 6.1196 \equiv$  **6 Units**

- 2.2.11 Additionally, the **Floor Area Ratio (FAR)** given in the **National Model Design Code for Suburban Settings** should be (*"LESS THAN"*) **<0.5** whereas the **Floor Area Ratio** for the proposal is **GIA/Site Area = 709.7/1020 = 0.6958 ( $\equiv$  0.7)** which is a **39.16%** increase on the **maximum of <0.5 Design Code** recommendation. The Policy states: *"These measures can be combined to further control development and should be used alongside good design principles."* Again, As indicated in **NPPF para 129**, in the absence of **locally produced design guides or design codes** for 'Floor Area Ratio' in the current **Croydon Local Plan (2018)** or the **Draft Revised Local Plan**, the '**Floor Area Ratio**' defined in the **National Documents** should be used to *"guide decisions on applications"*.
- 2.2.12 The evidence is **clear proof** of **over-development** of the '**Site Capacity**' for an area of **0.102hectares** at an '**Outer Suburban**' or '**Suburban**' **Setting** as judged on **National Policies**. If the Case Officer disagrees with this assessment, we would respectfully request full and detailed **justification** as to why, or to define an equivalent "**Design Code**" value with full supporting criteria of assessment.
- 2.2.13 The applicant's proposal does **NOT** provide any evidence of meeting the **National Model Design Code** guidance. This should have been a topic discussed during the Pre-Application Meeting Ref:21/00548/PRE July 2021 as the **National Model Design Code** was initially published in January 2021 and formally issued in June 2021. **None of these Policy requirements have been considered or met.**

### 3 London Plan Policy D3 Design

#### 3.1 London Plan Policy D3 States:

"A 'All' development must make the best use of land by following a Design-Led Approach that optimises the "capacity" of sites, including site allocations. Optimising 'site capacity' means ensuring that development is of the most appropriate form and land use for the site. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and 'capacity for growth,' and existing and planned supporting 'infrastructure capacity' (as set out in **Policy D2 Infrastructure requirements for sustainable densities**<sup>5</sup>), and that best delivers the requirements set out in **Part D**."

<sup>5</sup> [https://www.london.gov.uk/sites/default/files/the\\_london\\_plan\\_2021.pdf](https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf)

### Policy D3 Para 3.3.2

*“A **design-led approach** to optimising **site capacity** should be based on an **“evaluation”**<sup>6</sup> of the **site’s attributes**, its surrounding context and its **capacity for growth** to determine the appropriate form of development for that site.”*

### Policy D3 Para 3.3.4

*“Designating appropriate development capacities through site allocations enables boroughs to proactively **optimise the capacity** of strategic sites through a consultative **design-led** approach that allows for meaningful engagement and collaboration with **local communities**, organisations and businesses.”*

- 3.2 The applicant’s proposal does NOT provide any evidence of meeting London Plan Policy D3 with respect to the **“Design-Led Approach”** or meeting or optimising the development within the **“Site Capacity”**. Again, this should have been a topic discussed during the Pre-Application Meeting Ref:21/00548/PRE July 2021 as the new London Plan was published in March 2021. **None of these London Plan Policy D3 requirements have been considered or met.**
- 3.3 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.**”*
- 3.4 The issue here is that there is ‘NO definition’ of the magnitude of **“incremental”** but this should be defined in the Design Code for the Site or Locality, taking account of its Setting and supporting infrastructure.
- 3.5 There is **NO** mention of the **London Plan Policy D3 or H2 Para 4.2.5** in either the Current adopted or the **Draft Revised Croydon Plan** and there is **NO** mention of **“Design Codes”** or their parameters or a **“Design-Led Approach”** in either the current adopted **Croydon Local Plan** or the **Draft Revised Local Plan**<sup>7</sup>.
- 3.6 This, also, should have been a topic discussed during the Pre-Application Meeting Ref:21/00548/PRE July 2021 as the new London Plan was published in March 2021. Therefore, it would be inappropriate for the LPA Development Management to **ignore or disregard** these and the higher hierarchical Levels of **Planning Policy**. **Clear and precise ‘justification’ should be provided if any of these policies are disregarded during assessment and prior to determination of this proposal.**

<sup>6</sup> Definition of **“evaluation”**: The making of a judgement about the **amount, number, or value** of something.

<sup>7</sup>

<https://democracy.croydon.gov.uk/documents/s34159/Appendix%201%20Proposed%20Submission%20Draft%20of%20Croydon%20Local%20Plan.pdf>



## 4 Croydon Local Plan

### 4.1 “Incremental, Focussed, Moderate or Gentle Intensification”

#### 4.1.1 Croydon Local Plan (2018) ‘Growth’ Policies

The current **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**’ 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. This proposal is 4 storeys or 3 storeys plus accommodation in the roof space.

4.1.2 The current 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.

4.1.3 However, it is understood that the **Draft Revised Croydon Local Plan**<sup>8</sup> (for Cabinet approval on 6th December and probably at Full Council on 31<sup>st</sup> January 2022) omits **Table 6.4** and replaces it with a modified version of **Table 6.5** which is just a tick box guide to evolution (*i.e.*, *No defining parameters*). **Paragraph 6.62** has been modified to include a “**Moderate Intensification**” category and **6.56a** to include a “**Gentle densification**” category, but again, there is no definition for what is meant by “**Moderate**” or “**Gentle**.” These are abstract objectives, NOT policies.

4.1.4 The Draft Revised Croydon Local Plan at **Table 1.1** Croydon’s Planning Policy Framework indicates **The London Plan** has been an input to the production of the **Revised Croydon Plan**. However, the **Draft Revised Croydon Plan** does **NOT** reference **London Plan Policies of ‘Chapter 3 - Design’** other than **D9** (Tall Buildings) and **D13** (Impact of Change). Therefore, the *main thrust* of **London Plan’s “Design-Led Approach,” “Site Capacity limitations”** and requirement for definition of “**Design Codes**” for **Residential localities** have been completely disregarded.

4.1.5 There is **NO definition** of any assessment limiting parameters for “**Incremental Intensification**” in the Adopted **London Plan** or the adopted **Croydon Local Plan**. There is **NO definition** of any assessment limiting parameters for “**Moderate Intensification**” in the Adopted **London Plan** or the adopted **Croydon Local Plan** or the revised draft **Local Plan**. There is **NO definition** of any assessment limiting parameters for “**Gentle Intensification**” in the Adopted **London Plan** or the adopted **Croydon Local Plan** or the revised draft **Local Plan**. In summary these

<sup>8</sup>

<https://democracy.croydon.gov.uk/documents/s34159/Appendix%201%20Proposed%20Submission%20Draft%20of%20Croydon%20Local%20Plan.pdf>

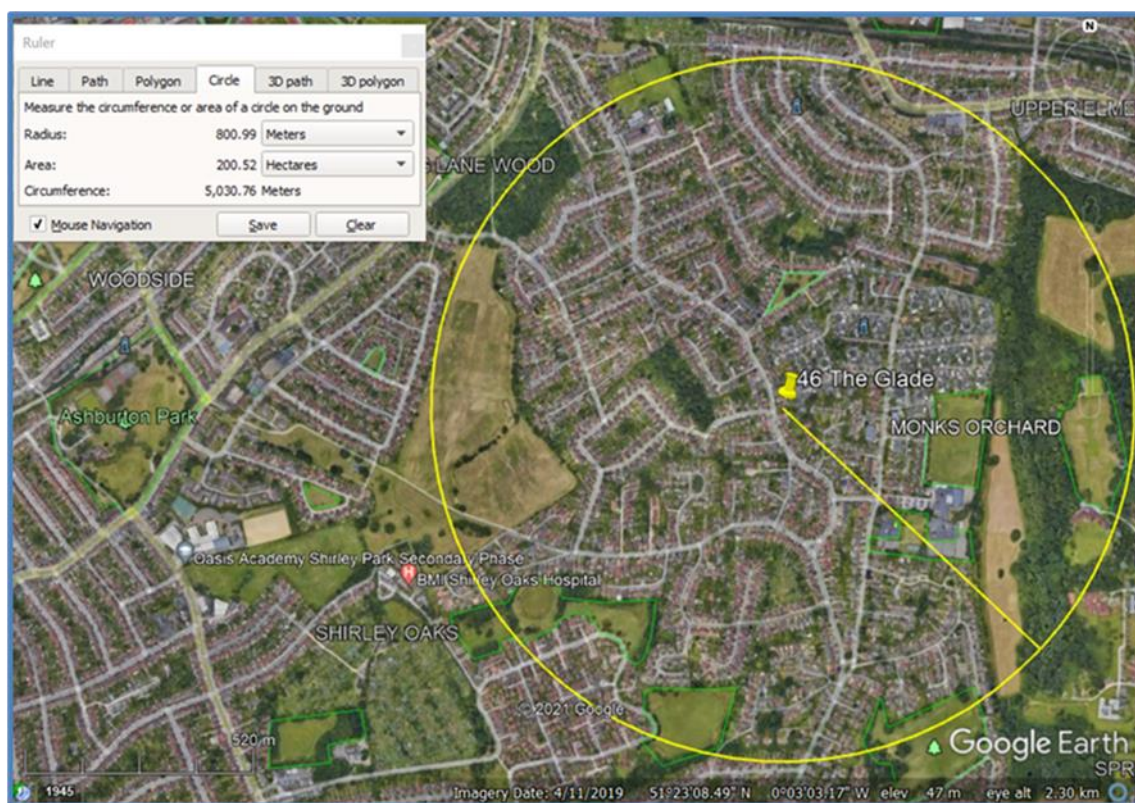
designations are meaningless. *In fact, there is NO meaningful management Policy of “Growth,”* a fundamental requirement of the job description for Development Management.

4.2 The new London Plan Policy H2 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 station<sup>9</sup> or town centre boundary<sup>10</sup>...”*

4.2.1 **46 The Glade** has a **PTAL of Zero** and is greater than **800m** from a **Tram/Train Station** or **District Centre** and as such is inappropriate for **incremental intensification**.

4.2.2 If the case officer is minded to recommend approval, we request detailed ‘*justification*’ for allowing the proposed ‘*intensification*’ in terms of Housing and Residential Density for this proposal at this Setting and PTAL in contradiction to the London Plan Policy H2 at para 4.2.4 and the London Plan Policy D3 and “Design Code” and the Department for Levelling Up, Housing and Communities “National Model Design Code and Guidance”.



**Google Image of 800m radius from 46 The Glade showing that it is over 800m from Tram/Train Station and District Centre**

## **5 Sustainable Developments – Public Transport Accessibility**

5.1 The **Sustainability** of developments require the proposal to provide acceptable **accommodation standards** and long-term accessibility to supporting infrastructure.

<sup>9</sup> Tube, rail, DLR or tram station.

<sup>10</sup> District, major, metropolitan and international town centres.

This includes an appropriate accessibility to **Public Transport** in the longer term. It is known that there is **NO** possible improvement to **Public Transport Accessibility** in **Shirley North Ward** at least until **2031** as indicated on the **TfL WebCAT** for This Post Code or address. We have evaluated the appropriate **PTAL** which would be required to support this proposal as Illustrated and calculated below:

## 5.2 The current adopted Croydon Local Plan Policy **SP1.4** States:

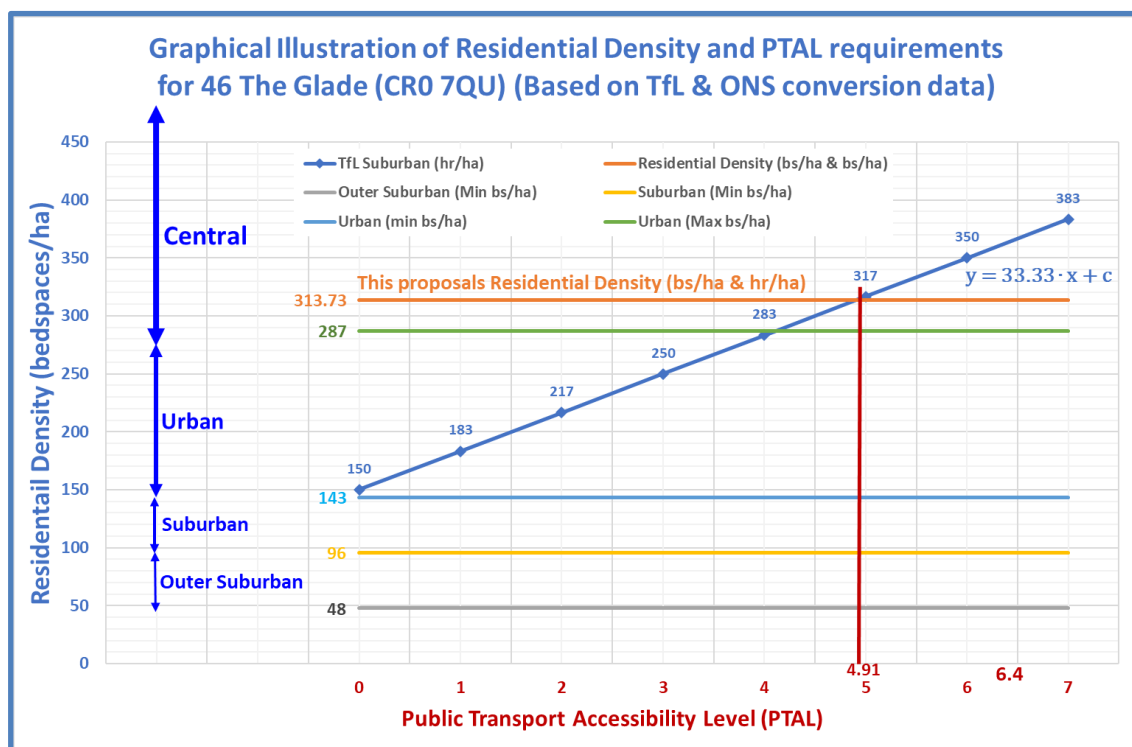
***“SP1.4 The Council will seek to encourage growth and sustainable development and to manage change, so as to create a network of connected, sustainable, high quality, locally distinctive, healthy places.”***

## 5.3 It should be noted that it is ‘people’ that require public services infrastructure, such as public transport accessibility, GP Services & Schools, **NOT** Housing Units, so an appropriate **Residential Density** in **Bedspaces/ha** should be defined for each **setting**.

## 5.4 Assuming a linear incremental increase over the PTAL ranges from PTAL 0 to 6, the Residential Density will follow the simple function $y = mx + c$ . Which gives: Residential Density $\left(\frac{bs}{ha}\right) = 313.73 = \frac{343}{7} \cdot x + c$ . as $c = 0$ , $x = PTAL = 6.4$ .

## 5.5 Therefore, the required PTAL for this proposal is 6.4 when the actual available PTAL is Zero and remains at Zero until at least 2031 for this Post Code or Address.

## 5.6 This assessment provides clear evidence that the proposal at occupancy of 313.73bedspaces/ha or hr/ha would require a **PTAL** of 4.91 which is clearly ‘unsustainable’ and unacceptable at the ‘Design Code’ and ‘Setting’ of the Locality.



**Graphical illustration of PTAL requirements for the proposed development at 46 The Glade with Residential Densities based upon the TfL data and Office for National Statistics (ONS) data for Unit Occupancy.**



## 6 Housing quality and standards.

6.1 The proposal meets most **London Plan Policy D6 minimum space Standards** given at **Policy D6 Table 3.1**. The proposal does **NOT** however, indicate the amount of **In-Built Storage** of any of the **9 Flats**. The **Dimensions** are **NOT** stated.

### 6.2 Play Space for Children:

#### 6.2.1 London Plan Policy S4 Play and informal recreation States:

*“B Development proposals for schemes that are likely to be used by children and young people should:*

- 1) *increase opportunities for play and informal recreation and enable children and young people to be independently mobile*
- 2) *for residential developments, incorporate good-quality, accessible play provision for all ages. At least **10 square metres** of play space should be provided per child that:*
  - a) *provides a stimulating environment*
  - b) *can be accessed safely from the street by children and young people independently*
  - c) *forms an integral part of the surrounding neighbourhood*
  - d) *incorporates trees and/or other forms of greenery*
  - e) *is overlooked to enable passive surveillance*
  - f) *is not segregated by tenure ...”*

#### 6.2.2 Croydon Local Plan (2018) Policy DM10.4 States:

**DM10.4** *“All proposals for new residential development will need to provide private amenity space that.*

- d. *All flatted development and developments of **10 or more houses** must provide a minimum of **10m<sup>2</sup> per child** of new play space, calculated using the Mayor of London’s population yield calculator and as a set out in Table 6.2 below. The calculation will be based on all the equivalent of all units being for affordable or social rent unless as signed Section 106 Agreement states otherwise, or an agreement in principle has been reached by the point of determination of any planning application on the amount of affordable housing to be provided. When calculating the amount of private and communal open space to be provided, footpaths, driveways, front gardens, vehicle circulation areas, car and cycle parking areas and refuse areas should be excluded; and ...”*

#### 6.2.3 The current Croydon Local Plan at para 6.54 states:

**6.54** *“The minimum standard of **10m<sup>2</sup>** per child of children’s play space, where there are **10 or more** children living in the development is from the Mayor’s Housing SPG (2.16) and, although it applies to publicly funded housing*



*development and that on GLA land, it is considered best practice. ... The SPG ... recommends a minimum benchmark of 10m<sup>2</sup> of dedicated play space per child."*

**6.2.4 The analysis of the offered Play Space is set out in the following Table:**

There is a contradiction between the Croydon Plan and London Plan in that the Croydon Local Plan limits the Policy of 10m<sup>2</sup> per child to developments of 10 Units or greater. This is challenged on grounds of Inequality as a child of any Flatted Development within 1 to 9 Units is being deprived of Play Space on very questionable reasons.

Dwelling	Probable Children	Play Space Offered	London Plan Play Space	Play Space Deficient
Flat 1	2	4.6	20	15.4
Flat 2	2	4.6	20	15.4
Flat 3	1	1.2	10	8.8
Flat 4	1	1.2	10	8.8
Flat 5	2	1.2	20	18.8
Flat 6	1	1.2	10	8.8
Flat 7	1	1.2	10	8.8
Flat 8	1	1.2	10	8.8
Flat 9	2	1.2	20	18.8
<b>Totals</b>	<b>13</b>	<b>17.6</b>	<b>130</b>	<b>112.4</b>

**6.2.5 The draft revised Croydon Local Plan at Policy DM1A and The London Plan Policy S4 Play and an informal recreation - has no restriction or differentiation on grounds of number of Units within a development and is therefore considered more appropriate.**

**6.2.6 As the London Plan is higher in the Planning Hierarchy it is assumed to carry more weight and therefore should override the deficiencies of the Croydon Local Plan, (unless the Case Officer can give justification for not doing so).**

**6.2.7 The evidence in the above table indicates a deficiency of Play Space for the probable number of children to be 112.4m<sup>2</sup> which is a deficiency of 13.538%.**

## **7 Parking**

**7.1 Croydon Local Plan SP8 Transport and Communication Indicates:**

The Targets for outcomes preclude PTALs 0 to 3. The proposed Development has PTAL 'Zero' and is forecast to remain at Zero until at least 2031.

**7.2 The Draft Revised Croydon Local Plan proposes at DM30 - Car and cycle parking in new developments:**

*"DM30.1 .1 To manage the impact that parking provision has on traffic generation. And the impact of traffic on the climate development must ensure that car parking provision is in accordance with the standards set out in Table 10.1."*

**7.3 The Revised Draft Croydon Local Plan calculate Parking spaces on the spaces per Unit and for Areas with no controlled Parking, on the basis of number of Bedrooms of those Units at various PTAs whereas the Adopted London Plan calculate the Parking Spaces on the number of Units at the various Outer London Boroughs Croydon PTALs.**

**7.4 Revised Draft Local Plan Policy Car parking in new developments.**

#### 7.4.1 Table 10.1

Public Transport Accessibility Level	Minor non-residential developments	Major non-residential	1 and 2-bedroom homes in an area with a Controlled Parking Zone	3 or more bedroom homes in an area with a Controlled Parking Zone	All homes in an area with no Controlled Parking Zone
2	As per London Plan	As per London Plan	<ul style="list-style-type: none"> <li>Up to 0.5 spaces per unit</li> <li>In areas with parking stress levels above 85% all rights for parking permits will be removed</li> </ul>	<ul style="list-style-type: none"> <li>In areas more than 800m from a train station or tram stop 1 space per unit must be provided</li> <li>In areas within 800m of a train station or tram stop of 0.6 spaces per unit must be provided</li> <li>In areas with parking stress levels above 85% all rights for parking permits will be removed</li> </ul>	<ul style="list-style-type: none"> <li>0.75 space per unit for 1 and 2-bedroom homes</li> <li>1-2 spaces per unit for homes with 3 or more bedrooms subject to parking stress surveys</li> </ul>
0, 1A or 1B	As per London Plan – all parking demand must be accommodated on site	As per London Plan – all parking demand must be accommodated on site	1 space per unit	1.5 space per unit	<ul style="list-style-type: none"> <li>1 space per unit for 1 and 2-bedroom homes</li> <li>1.5 space per unit for homes with 3 or more bedrooms</li> </ul>

7.5 The **London Plan Policy T6 on Residential Parking** quotes at **Table 10.3** for **Outer London** at **PTAL 0** localities.

Location	Number of beds	Maximum parking provision*
Outer London PTAL 4	1 – 2	Up to 0.5 - 0.75 spaces per dwelling+
Outer London PTAL 4	3+	Up to 0.5 - 0.75 spaces per dwelling+
Outer London PTAL 2 – 3	1 – 2	Up to 0.75 spaces per dwelling
Outer London PTAL 2 – 3	3+	Up to 1 space per dwelling
Outer London PTAL 0 – 1	1 – 2	Up to 1.5 space per dwelling
Outer London PTAL 0 – 1	3+	Up to 1.5 spaces per dwelling^

**London Plan Table 10.3 – Maximum residential parking standards.**

#### 7.6 Analysis of Residential Parking provision:

7.6.1 The analysis shows that for new developments in areas without controlled parking Zones and at **PTAL Zero**, would be **10 spaces** for the Revised draft **Croydon Local Plan Policy DM30 Table 10.1** and **13.5 ≈14 spaces** for the adopted **London Plan Policy T6.1 Table 10.3** when only **7** are provided.

This is a **42.86% deficiency** for the Revised Draft Croydon Plan and a **92.86% deficiency** for the London Plan Policy.

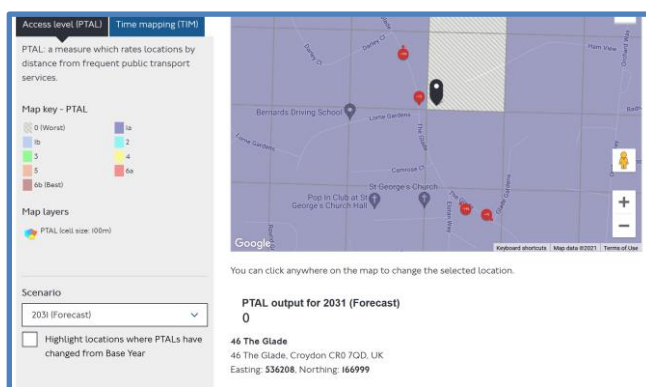
- 7.6.2 From this analysis, the Residential Parking provision is inadequate for a **nine flatted development** at a **PTAL Zero** locality and therefore the proposal should be rejected as it would likely generate at least 3 car overspill (Revised Local Plan) onto adjacent streets. This would be extremely hazardous if overspill parking were to be on The Glade (the 367 Bus Route) as the Glade provides a busy link between the A232 (Wickham Road) and the A222 (Long Lane). Further, occupants may use the Lorne Garden residential street for overspill, but the possible overspill may be combined with the redevelopment of 81 The Glade (Opposite 45 The Glade) Application Ref: 21/00108/FUL which although refused at committee is pending an appeal.

Parking Standards				
Dwelling	Bedrooms	Bedspaces	Residential Parking London Plan PTAL 0 - 1	Residential Parking Revised Local Plan <sup>1</sup> (Table 10.1)
Flat 1	3	4	1.5	1.5
Flat 2	3	4	1.5	1.5
Flat 3	2	3	1.5	1
Flat 4	2	3	1.5	1
Flat 5	2	4	1.5	1
Flat 6	2	3	1.5	1
Flat 7	2	3	1.5	1
Flat 8	2	4	1.5	1
Flat 9	2	4	1.5	1
Totals	20	32	14	10
Parking Provided			7	7
Probable overspill			7	3
Percentage under provision			92.86%	42.86%

<sup>1</sup> All Homes in an area with no controlled Parking Zone (Table 10.1)

#### Analysis of Parking Provision

- 7.6.3 It is noted that the “**Vision Transport assessment**” **Parking Assessment Report** of 13<sup>th</sup> August supplied as evidence for the applicant, provides an **incorrect evaluation** of the **PTAL** for **46 The Glade**, indicating a **PTAL** of **1a** when the actual Site **PTAL** is **Zero** as show by the downloaded interrogation of the TfL WebCAT forecast up to 2031.



#### The Actual TfL WebCAT PTAL Forecast

- 7.6.4 It is noted that reference 20 in the current adopted Croydon Local Plan (see Ref: 20<sup>11</sup> page 28). and in the **Revised Draft Croydon Plan (Ref: 22 page 50)** indicates that a site with lower **PTAL** than surrounding Sites or adjacent Streets be considered at the **higher PTAL**. This **negates** the **TfL Cell Grid size analysis** from **10,000m<sup>2</sup>** to **90,000m<sup>2</sup>** which makes **ALL TfL assessments** of **PTAL Connectivity inaccurate<sup>12</sup>**. For what logical reasoning and purpose is this ‘corruption’ of the TfL PTAL Assessment which undermining the expertise of TfL Officers assessment of Public Transport Connectivity and Accessibility?

## **8 Parking Accessibility**

- 8.1 The proposed Parking is afforded on the front forecourt of the development with minimal screening. The ingress and egress assessment may be possible, with

<sup>11</sup> Croydon Plan Ref: 20 Public Transport Accessibility Level – a rating of accessibility provided by Transport for London. A site with a lower PTAL than the surrounding sites and adjoining streets shall be considered at the higher PTAL.

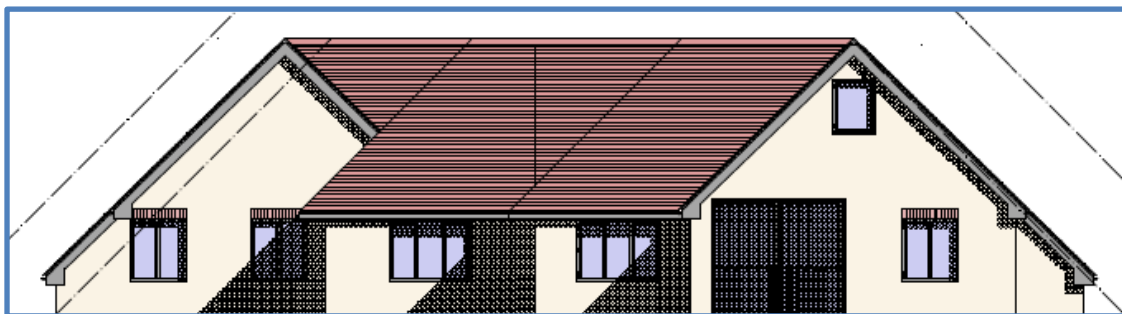
<sup>12</sup> <https://content.tfl.gov.uk/connectivity-assessment-guide.pdf>

all other bays occupied, with reverse and forward manoeuvres but confirmation by provision of Swept Path Diagrams would be appropriate to confirm acceptability. The exit from the disabled parking Bay would require at least four manoeuvres from a previous forward parked position prior to being able to exit in a forward gear.



## 9 Roof Form

- 9.1 The Rear elevation **Roof Form** has a vertical elevation, presumably housing the Lift motor and mechanism, which looks **odd** from the view as presented to the rear.



**Roof Form showing inappropriate Vertical Rear Elevation structure.**

## 10 Targets

### 10.1 The Revised Local Plan (6<sup>th</sup> December 2021)

- 10.1.1 Policy **SP1.0C** States: *“There are residential areas where the characteristics and infrastructure provision have led to the identification of potential for sustainable housing growth and renewal.*

*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.*



- 10.1.2 Planning Officers and Committee members quote the need for housing as a prime objective of planning approvals even when non-compliant to planning Policies.
- 10.1.3 The **Revised Croydon Plan** has revised target for “**Places**” over the period **2019 to 2039** and at Table 3.1 (page 31) states the target for the Shirley “**Place**” to be 278 Dwellings. This equates to an average year-on-year for the Shirley “**Place**” of **13.9 dwellings/year**.
- 10.1.4 However, as shown, the **MORA Area** is **178.26ha** which is less than the **Shirley North Ward Area** of **327.9ha** or the **Shirley South Ward** of **387.3ha** or the combined **Wards of Shirley** at **715.2ha**. Which is smaller than the undefined area of the **Shirley “Place.”**
- 10.1.5 Therefore the rate of increase in number of dwellings in the **MORA Area** is significantly exceeding the Target as redefined in the **Revised Local Plan** of **278 Units** over **20 years** to **860 units**, a **209.353%** increase

MORA Area re-developments			
Year	Existing Dwellings	New Dwellings	Overall
2019	6	54	48
2020	5	28	23
2021	10	68	58
<b>Total</b>	<b>21</b>	<b>150</b>	<b>129</b>
Average per year	7.00	50.00	43.00
Shirley Place Target 2019 -2039			278
Shirley Place Average per year			13.9
At the MORA rate of 43 Units/Year over 20 yr period =			860
MORA Area	Area (ha)	Population	Dwellings (Units)
MORA Area 2021	178.26	9283	3884
Target	178.26	9561	4162
MORA Area 2039 actual	178.26	11338	4744

## 10.2 Development Management

- 10.2.1 The recommended methodology to manage increased Housing Units within the acceptable Targets and to maintain the local character is to enforce those development proposal to meet all the parameters of the Design Codes for the area and to implement the “Design-Led Approach” and “Site Capacity” requirements on the proposed developments, a fundamental objective of the Job Description of “Development Management”.

## Summary and Conclusions

- 11.1 There has been significant failure during the **pre-application** discussions **Ref:21/00548/PRE** in **July 21** between the Planning Officers and the Applicant when current adopted Policies and Planning Guidance of the NPPF (July 2021), the Department for Levelling Up, Housing and Communities, National Model Design Code and guidance (June 2021), and the London Plan Policies (March 2021) D3 Design-Led Approach and Site Capacity Assessment, were all disregarded by the Planning Officer(s).
- 11.2 We would appreciate an acknowledgement of this situation and an explanation why these aforementioned Policies were not discussed, or why the final proposal was non-compliant with the related policies as outlined in the applicant’s Planning submission as all these policy documents had been published and available for scrutiny throughout 2021.
- 11.3 There is NO mention of the London Plan Policy D3 or H2 Para 4.2.5 in the Current adopted Croydon Plan and there is NO mention of “Design Codes” or their parameters or a “Design-Led Approach” in either the current adopted Croydon Local Plan or the Draft Revised Local Plan. Therefore, it would be inappropriate for the LPA Development Management to assess the proposal and make a recommendation or determination

without acknowledging the absence of these Policies and that assessment should be judged on the requirements defined at the higher hierarchical Level of Planning Policy, namely the National Model Design Codes and Guidance.

- 11.4 The NPPF at Para 129 gives clear direction that in the absence of Local Design Codes and guidance, the National Model Design Code and Guidance should be used for assessing proposals.
- 11.5 It is clear from the Applicant's provided documentation and Plans that NO account has been taken of the National Model Design Code and Guidance to determine the Area Design Code(s) "Setting" for this proposal.
- 11.6 Additionally, NO account has been taken on the main thrust of the New London Plan since the omission of the density Matrix, to assess the Site Capacity and the replacement Policies requiring a Design-Led approach.
- 11.7 Further, NO account has been taken of the Department for Levelling Up, Communities and Housing (LUCH) published National Model Design Codes and Guidance for local settings as defined and described above.
- 11.8 **Clear and precise justification should be provided if these policies are disregarded.**
- 11.9 After a detailed assessment of Housing Densities for the Shirley North Ward, the Shirley South Ward, the combined all of Shirley, the MORA Area and the Post Code of the locality for the redevelopment, all showing a local "Setting" of or below "Outer Suburban" Housing Density in units/hectare, we would expect the Case Officer to respond to this analysis and if these Policies are disregarded, would respectfully request reasons. In addition, if these Policies are not considered appropriate, we expect realistic detailed justification why and if alternative parameters were considered appropriate for determining the Site Capacity, we would respectfully request they be defined with justifiable criteria and reasoning.
- 11.10 The offered Housing Density of the proposal is **88.24Units/ha** which is a Setting of Mid-Urban Range and **46 The Glade** is, by all assessments of the locality, in an Outer Suburban Setting.
- 11.11 The proposal is inappropriate for **"Incremental Intensification"** as it is Below PTAL 3 and greater than 800m from a Tram/Train Station or District Centre as defined by London Plan Policy H2 para 4.2.4.
- 11.12 The London Plan or Croydon Local Plan has no definition of **"Incremental"**, **"Moderate"** or **"Gentle"** intensification and therefore these Policy requirements are abstract and irresolute.
- 11.13 **Public Transport Accessibility.**
- 11.13.1 There is **NO** possible improvement to **Public Transport Accessibility** in **Shirley North Ward** at least until 2031 as indicated on the TfL WebCAT for This Post Code or address. We have evaluated the appropriate PTAL which would be required to support this proposal at **PTAL 6.202** when the available **PTAL is Zero**.

## 11.14 Housing quality and standards.

- 11.14.1 The proposal meets most **London Plan Policy D6** minimum space Standards given at **Policy D6 Table 3.1**. The proposal does NOT however, indicate the amount of **In-Built Storage** of any of the 9 Flats. The Dimensions are NOT stated.

## 11.15 Play Space

- 11.15.1 There is a contradiction between the Croydon Plan and London Plan in that the Croydon Local Plan limits the Policy of 10m<sup>2</sup> per child to developments of 10 Units or greater. This is challenged on grounds of Inequality as a child of any Flatted Development within 1 to 9 Units is being deprived of Play Space on very questionable reasons.
- 11.15.2 The London Plan has no restriction or differentiation on grounds of number of Units within a development and is therefore considered more appropriate.
- 11.15.3 As the London Plan is higher in the Planning Hierarchy it is assumed to carry more weight and therefore should override the deficiencies of the Croydon Local Plan, (unless the Case Officer can give justification for not doing so).
- 11.15.4 The evidence indicates a deficiency of Play Space for the probable **13 children** to be **112.4m<sup>2</sup>** which is a deficiency of **13.538%**.

## 11.16 Parking

- 11.16.1 It is noted that the "Vision Transport Assessment" Parking Assessment Report of 13th August supplied as evidence for the applicant, provides an **incorrect** evaluation of the PTAL for 46 The Glade, indicating a PTAL of 1a when the actual Site PTAL is Zero as show at TfL WebCAT forecast up to 2031.
- 11.16.2 The analysis shows that for new developments in areas without controlled parking Zones and at **PTAL Zero**, would be **10 spaces** for the Revised draft **Croydon Local Plan Policy DM30 Table 10.1** and 13.5 **≈14** spaces for the **adopted London Plan Policy T6.1 Table 10.3** when only **7** are provided. This is a **42.86% deficiency** for the **Revised Draft Croydon Plan** and a **92.86% deficiency** for the **London Plan Policy**.
- 11.16.3 It is noted that in both the adopted **Croydon local Plan** and the **Revised Draft Croydon Plan** that a site with lower PTAL than surrounding Sites or adjacent Streets be considered at the **higher PTAL**. This negates the TfL Cell Grid size analysis from **10,000m<sup>2</sup>** to **90,000m<sup>2</sup>** which makes **ALL** TfL assessments of **PTAL inaccurate**. This deviation from the TfL authoritative definition and assessment of Public Transport Accessibility<sup>13</sup> **undermines the principle of evaluating connectivity** and assumes a higher level of connectivity than is afforded to the occupants who reside within that **100m-by-100m Cell**. This policy is dismissive of the TfL expert analysis of Public Transport Accessibility and Connectivity and undermines the TfL Officers professionalism.
- 11.16.4 It would be helpful if the logic of this transformation of PTAL were explained and justified as it is unhelpful for future occupants, as the reality of connectivity is as defined by the TfL WebCAT, and the vicissitude is seemingly only of assistance to developers. allowing less parking provision on the site than would normally be required. This is another

<sup>13</sup> <https://content.tfl.gov.uk/connectivity-assessment-guide.pdf>



example of relaxation or circumvention of Policies in favour of Developers at the expense of facilities for future or existing residents or occupants.

### **11.17 Parking Accessibility**

11.17.1 The accessibility into and exit from each parking bay, with all other bays occupied should be proven by production of swept path illustration to ensure the safety and manoeuvrability is acceptable.

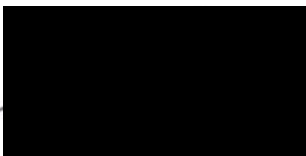
## **12 Recommendation**

12.1 Taking all the foregoing assessments and evidence when considered in total, the whole assessment would combine to provide sufficient proof of overdevelopment for the Setting and the Site, which exceed Site Capacity for 0.102ha at this Setting and locality.

12.2 The assessment is therefore that this proposal should be refused with the objective of the applicant reapplying with a more appropriate and suitable proposal.

**Kind regards**

**Derek**



**Derek C. Ritson I. Eng. M.I.E.T.**  
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**Chairman MORA**  
**Monks Orchard Residents' Association.**  
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Cc:

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

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

Bcc:

MORA Executive Committee, Local affected Residents & Interested Parties