


## Representation Form for Croydon Local Plan Review

 www.croydon.gov.uk	<b>Local Plan</b> Publication Stage Representation Form	<b>Ref:</b>  <b>(For official use only)</b>
---	---	---

**Name of the Local Plan to which this representation relates:**

**Croydon Local Plan  
(Revised) December 2021**

**Please return to [[ldf@croydon.gov.uk](mailto:ldf@croydon.gov.uk)] BY [5:00pm on 17/02/2022]**

*NB - LPA to include data protection / privacy notice, see para 4 of Explanatory Note*

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

### Part A

1. Personal  
Details\*

2. Agent's Details (if  
applicable)

*\*If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

Title	<input type="text" value="Mr"/>	<input type="text"/>
First Name	<input type="text" value="Derek"/>	<input type="text"/>
Last Name	<input type="text" value="Ritson"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value="Not Applicable"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="Monks Orchard&lt;br/&gt;Residents' Association"/>	<input type="text"/>
Address Line 1	<input type="text" value="[REDACTED]"/>	<input type="text"/>
Line 2	<input type="text" value="Shirley"/>	<input type="text"/>
Line 3	<input type="text" value="Croydon"/>	<input type="text"/>
Post Code	<input type="text" value="[REDACTED]"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text" value="planning@mo-ra.co"/>	<input type="text"/>

## Part B – Please use a separate sheet for each representation

Name or Organisation: **Monks Orchard Residents' Association (MORA)**

3. To which part of the Local Plan does this representation relate?

Paragraph **6.62b to e** Policy **SP4** Policies Map **Moderate Intensification**

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

### Moderate intensification

**6.62b** Moderate intensification will see developments that reasonably increase density in a way that positively responds to the local context and seeks to reinforce and enhance the existing predominant character. Developments will be scattered throughout areas, with a gradual change over time where the level of intensification will be limited by access to transport links, shops and green space.

**6.62c** In areas of moderate intensification shown in the policies map, new homes may be created by replacement of the existing buildings (including the amalgamation of sites) or the creation of new streets (such as a Mews development across multiple back gardens). Developments will increase the density and massing, within the broad parameters of the existing local character reflected in the form of buildings and street scene in particular.

**6.62d** Moderate intensification will not take place within in a Conservation Area or Local Heritage Area. Developments will have good access to services and public transport meaning either:

1. It is within 800m of Croydon Metropolitan Centre, or a Town Centre designated as a District Centre in the London Plan;
2. It is within 800m of a Local Centre, Neighbourhood Centre or Shopping Parade and it is an area with a PTAL of 3 or above; or
3. It is within 800m of a Local Centre, Neighbourhood Centre, or Shopping Parade and within 800m of a train or tram stop.

**6.62e** To accommodate growth which would complement the existing individual character of Places of Croydon and improve efficiency of land use, the Council promotes intensification by delivering at least an additional storey. The developments in the moderate intensification areas are required to provide amenities on the site in accordance with the guidance in the supplementary planning document.

**Assessment:**

**6.62b** Any ‘densification’ should **NOT** exceed the “**Site Capacity**” which is limited by the local “**Setting**” as defined in the **National Model Design Code and Guidance**<sup>1</sup>.

There is **NO** correlation between local **Setting** and access to **Transport Links (PTAL)**.

**There is NO guidance to determine the appropriate Residential Density (persons/ha) and required Public Transport Accessibility (PTAL) at any “Setting” or locality.**

**The Policy should define the relationship between Residential Density and PTAL taking account of the “Setting.”**

**6.62c** Developments will increase the density and massing, within the broad parameters of the existing local character reflected in the form of buildings and street scene in particular.

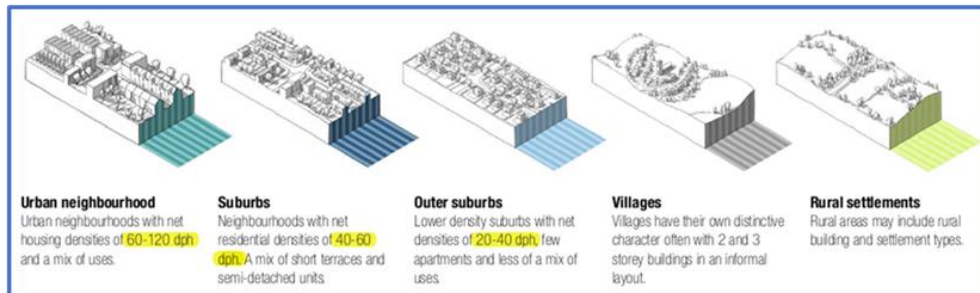
The increase is limited by the “**Setting**” and “**Site Capacity**” at the proposed development **Site** and the **Setting** (See Ref: 1).

**6.62d** A definition of “**Moderate**” Intensification is required as areas that are **<PTAL 3, >800m** from train/Tram station and District Centres are excluded from **Moderate Intensification**. **Although Shirley is NOT designated for “Moderate” Intensification, we have had many recent developments which have assumed Shirley is considered as acceptable for “Moderate” Intensification.** Shirley is classed as “Gentle” densification but the evidence proves otherwise!

---

<sup>1</sup> <https://www.gov.uk/government/publications/national-model-design-code>

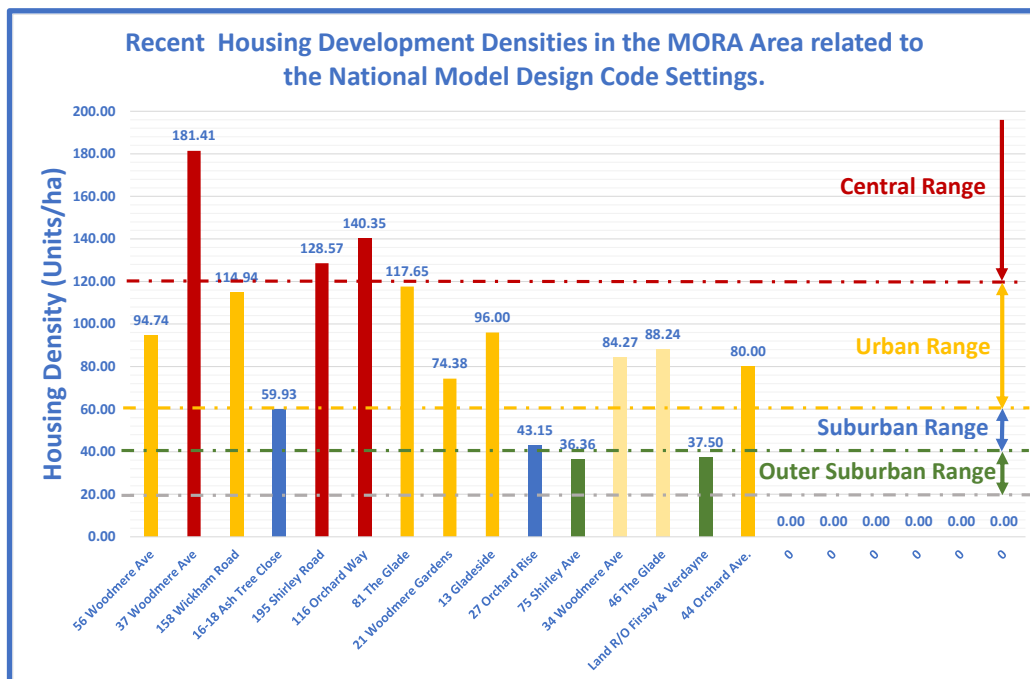
These illustrations below, extracted from the National Model Design Code, 'Part 1', show the 'explicit definitive' Housing Densities for the various Settings (Highlighted).



These illustrations, extracted from the National Model Design Code, Part 1, show the 'explicit definitive' Housing Densities for the various Settings (Highlighted).

Location	Area (ha)	Population	Dwellings (Units)	Residential Density (bs/ha)	Housing Density (Units/ha)	"Setting" for Design Code Density
Shirley North Ward	327.90	15666	6555	47.78	19.99	<Outer Suburban
Shirley South Ward	387.30	14147	5919	36.53	15.28	<Outer Suburban
All Shirley	715.20	29814	12474	41.69	17.44	<Outer Suburban
MORA Area	178.26	9283	3884	52.07	21.79	Outer Suburban
Post Code CR0 8S(*)	16.95	627	237	36.99	13.98	<Outer Suburban
Post Code CR0 8T(*)	11.82	644	246	54.48	20.81	Outer Suburban
Post Code CR0 7PL	1.73	47	19	27.17	10.98	<Outer Suburban
Post Code CR0 7QD	1.51	68	28	45.03	18.54	<Outer Suburban
Average	205.08	8787	3670	42.72	17.35	<Outer Suburban

Analysis of various areas within Shirley to establish the local Design Code Density as defined by the National Model Design Code & Guidance



Recent Development proposals which show that Applicants and Planning Officers have NO comprehension on the Housing Density appropriate for a Setting in the MORA area.

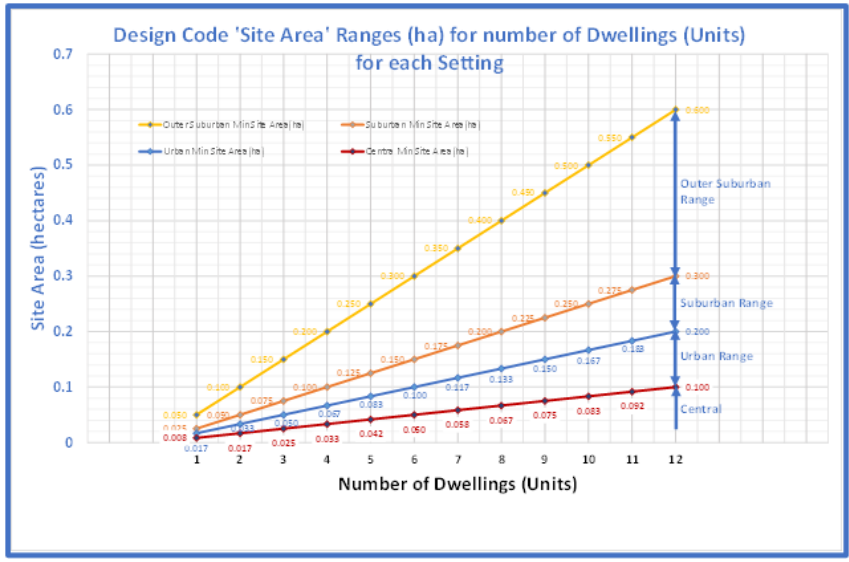
The graphical Histogram illustration (above) provides irrefutable clear evidence that Applicants and Planning Officers have '**NO comprehension**' of an appropriate **Density** for any "**Setting**" or "**Site Capacity**" for Development proposals. The fact that proposals listed in the above graphical presentation, some of which have been approved is a clear indication that either the current policies are **ineffective**, or they are being **disregarded** by both Applicants and Planning Officers. **The opportunity to correct this fundamental problem should require changes to the proposed Local Plan Review.**

The Local Planning Authority are **NOT discharging their fundamental Job Description of "Managing Developments.**

**6.62e** complement the existing individual character of Places of Croydon and improve efficiency of land use, the Council promotes intensification by delivering at least an additional storey. The developments in the moderate intensification areas are required to provide amenities on the site in accordance with the guidance in the supplementary planning document.

To **complement** the existing individual character of the "**Places**" of **Croydon** requires those "**Places**" to have "**Design Codes**" to define the character parameters of the "**Places**" or parts of "**Places.**" This requires compliance to the **National Model Design Code and Guidance** (Ref 1)

The addition of at least **an additional Storey** can only be 'acceptable' if the "**Site Capacity**" allows both **Housing Density** (Unit/ha) and the **Floor Area** (GIA/Site Area) to be below the **Design Code** Limits for the "**Setting**" as shown in the following graphical illustration as defined by the **National Model Design Code and Guidance**, (Ref 1) and that an additional storey (Dwelling) is not exceeded.



Site Capacities:												
Number of Dwellings	1	2	3	4	5	6	7	8	9	10	11	12
Outer Suburban Min Site Area(ha)	0.050	0.100	0.150	0.200	0.250	0.300	0.350	0.400	0.450	0.500	0.550	0.600
Outer Suburban Max Site Area (h)	0.025	0.050	0.075	0.100	0.125	0.150	0.175	0.200	0.225	0.250	0.275	0.300
Suburban Min Site Area (ha)	0.025	0.050	0.075	0.100	0.125	0.150	0.175	0.200	0.225	0.250	0.275	0.300
Suburban Max Site Area (ha)	0.017	0.033	0.050	0.067	0.083	0.100	0.117	0.133	0.150	0.167	0.183	0.200
Urban Min Site Area (ha)	0.017	0.033	0.050	0.067	0.083	0.100	0.117	0.133	0.150	0.167	0.183	0.200
Urban Maxn Site Area (ha)	0.008	0.017	0.025	0.033	0.042	0.050	0.058	0.067	0.075	0.083	0.092	0.100
Central Min Site Area (ha)	0.008	0.017	0.025	0.033	0.042	0.050	0.058	0.067	0.075	0.083	0.092	0.100

The 'Central Site Capacity' limit would ultimately be determined by the requirement to meet the "Minimum Space Standards" as defined in Table 3.1 of the London Plan. The graph could be extended with additional Dwellings (Units) proportionately.

If the Housing Target for the "Place" which includes the designated Intensification Area, is met or exceeded, then Housing need is satisfied, and "Intensification" is unnecessary.

**Compliance to NPPF:**

- 16. Plans should:
  - a) be prepared with the objective of contributing to the achievement of sustainable development<sup>11</sup>;

The Policy for Moderate intensification 6.62 a – e, has no definition and as such has no methodology to ensure development proposals are intensified within the parameters of the development's "Setting" or the "Site Capacity" and therefore "sustainability" of the developments is not assured.

- b) be prepared positively, in a way that is aspirational but deliverable;
- As the Policy for Moderate intensification 6.62 a – e has no quantifiable parameter, there is no definite limit and therefore the Policy is NOT

deliverable.

- d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;

The Policy for **Moderate intensification 6.62 a – e** is unclear in its requirement and therefore it is not evident how a decision maker should react to development proposals or how an Applicant can be sure a proposal would be reasonably acceptable.

#### Examining plans

35. Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:

- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs<sup>21</sup>; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

The Policy for **Moderate intensification 6.62 a – e**, has no definition and as such has no methodology to ensure development proposals are intensified within the parameters of the development's "**Setting**" or the "**Site Capacity**" and therefore the Policy is NOT positively prepared.

- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

The Policy for **Moderate intensification 6.62 a – e**, has no definition and as such has no methodology to ensure development proposals are intensified within the parameters of the development's "**Setting**" or the "**Site Capacity**" when there are alternative National Policies which would meet the requirement within the Site Capacity appropriate for the "**Setting.**"

- d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

The Policy for **Moderate intensification 6.62 a – e** is NOT consistent with National Policy as defined in the **National Model Design Code and Guidance**<sup>2</sup> published by the Department for Levelling Up, Housing and Communities (DLUHC) (January 2021 & July 2021).

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-

---

<sup>2</sup> <https://www.gov.uk/government/publications/national-model-design-code>

compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

**Recommendation:**

The Intensification designations are **NOT** defined, and **Applicants** and **Planning Officers** have **NO comprehension** what an acceptable (or unacceptable) level of **intensification** would be with respect to the **“Setting”**, or the **“Designation”** of **Intensification** as can be demonstrated by the various Development Proposals of recent periods in the **MORA Area** (See Graphical Illustration above).

However, using the **National Model Design Code and Guidance** in the National Model Design Code, Part 1, Section 2B Coding are the dph, the **Housing Densities** units/ha for **“Outer Suburban”** or **“Outer (London) Suburban”** at **20 to 40 units/ha**, **“Suburban”** at **40 to 60 units/ha** and **“Urban”** at **60 to 120 units/ha** and therefore we are able to recommend values for **“Focussed”**, **“Moderate”** and **“Gentle”** **Densification**.

The **National Design Code “Setting”** defines the **Housing Density Range** which defines **“Site Capacity”**. Any **“Intensification”** therefore should be restricted to within the **“Density Range”** specified by the **“Setting”**.

Thus, assuming that **“Intensification”** within a **“Setting”** as defined by the **National Model Design Code & Guidance**, retains the **“Setting”** designation, then the **Intensification** should remain within in the defined **Range of that Setting**.

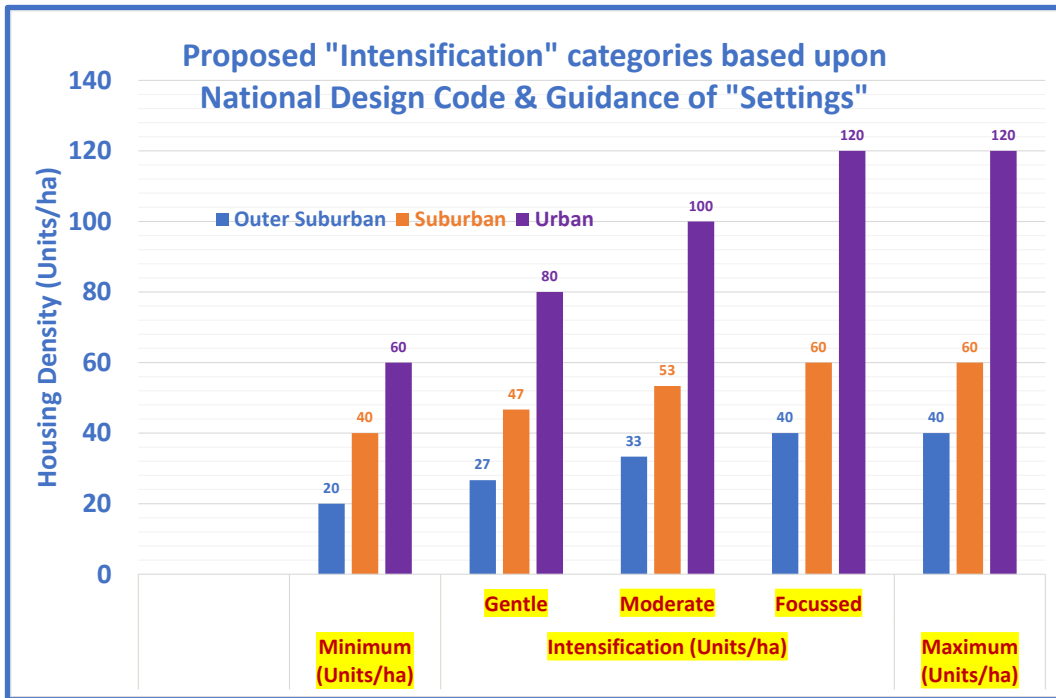
Therefore, we can define an estimate of the **‘Intensification’** categories within each of the **“Settings”** and the **“Intensification”** should **NOT** exceed, but be equal to, the maximum range of that **“Setting”**.

The **“Gentle”** and **“Moderate”** **Intensifications** within the **“Setting”** are proposed as **1/3<sup>rd</sup> & 2/3<sup>rd</sup>** of the **Range** at the **“Setting”**, but could be any recommended values within the setting as shown in the Table below:

Housing Density Setting	Minimum (Units/ha)	Intensification (Units/ha)			Maximum (Units/ha)
		Gentle	Moderate	Focussed	
Outer Suburban	20	27	33	40	40
Suburban	40	47	53	60	60
Urban	60	80	100	120	120

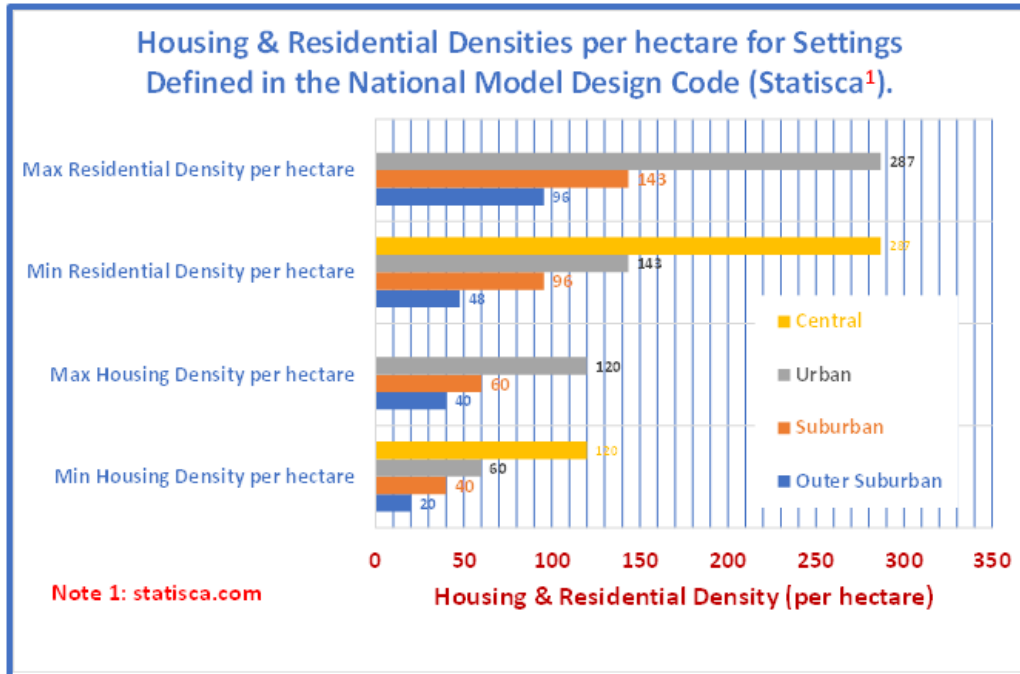
The Central **“Setting”** lower limit is **120units/ha** but has **no upper limit**. However, the upper limit will be determined by the requirement to meet the **London Plan Table 3,1 “Minimum Internal Space Standards for new dwellings.”**





**Graphical illustration of proposed Intensifications “Gentle, Moderate & Focused” within the “Settings”**

As the evaluation of this analysis is based upon the **National Model Design Code and Guidance**, we can use **National** compiled data to convert **Housing Density** to **Residential Density** using the **National Statistics of Dwelling Occupancy** from the **Office of National Statistics (ONS)** which states that according to their latest research, the National average occupancy for Dwellings in the UK is **2.39** person per Unit. This provides a conversion factor we can use for equivalent Residential Density Ranges for the National Model Design Code “Settings”



**Conversion between Housing Densities and Residential Densities for the various Settings**

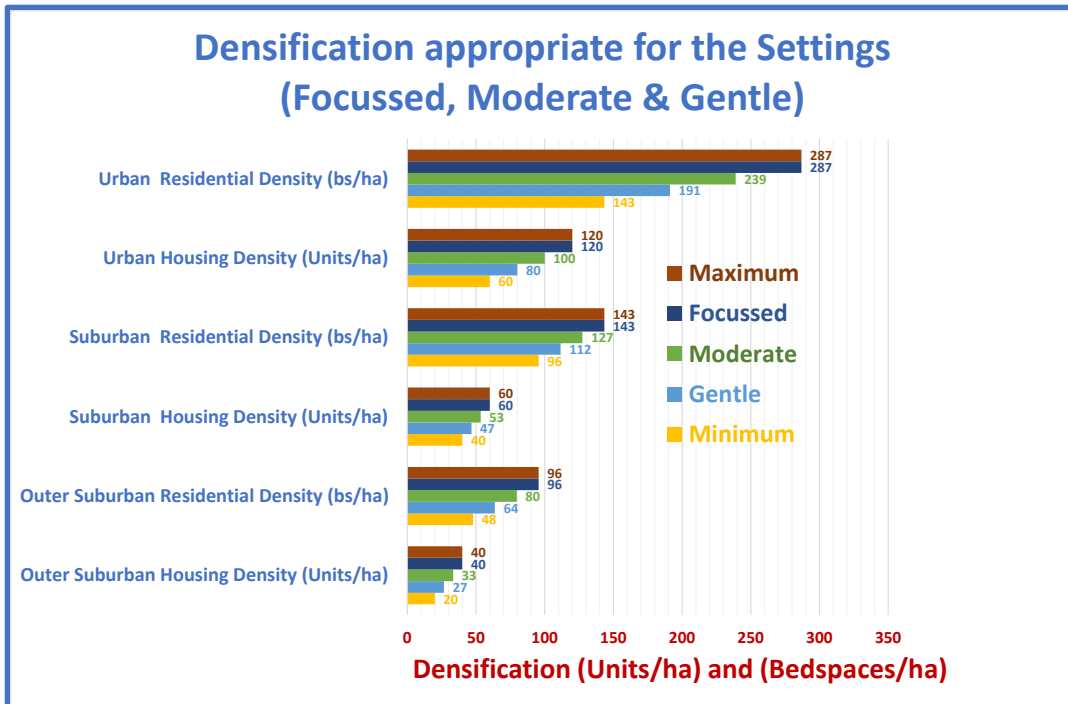
Residential Density	Minimum	Intensification (Persons/ha)			Maximum
Setting	(Persons/ha)	Gentle	Moderate	Focussed	(Persons/ha)
Outer Suburban	48	64	80	96	96
Suburban	96	112	127	143	143
Urban	143	191	239	287	287

The conversion factor indicates the **Residential Density** appropriate for the “Intensification” Categories: “Gentle”, “Moderate” & “Focussed” The conversion from *Housing Density to Residential Density as by use of a National average Unit (dwelling) occupation as derived by the NOS and Statista<sup>3</sup>*.

This proposed identification of the appropriate “Intensification” at the various “Settings” would allow Applicants and Planning Officers a greater understanding of the appropriateness of development proposals for the different “Places” and localities across the Borough.

Any deviation or allowed tolerance from the defined allocations to a proposal would require **justification** from both **Applicant** and **Planning Officer** in their Applications and determinations.

<sup>3</sup> <https://www.statista.com/statistics/295551/average-household-size-in-the-uk/>



**Housing and Residential Densification at each Setting for each designation of Intensification**

If the **Housing Target** for the “Place” which includes the designated **Intensification Area**, is met, or exceeded, then Housing need is satisfied, and “Intensification” is unnecessary.

**Local Residents and Residents Associations would have greater confidence in the Planning Process as it could be clearly seen that Policies were reasonable and were being implemented as compared to the current unmanaged, uncontrolled determinations.**

(Continue on a separate sheet /expand box if necessary)

**Please note** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

**No**, I do not wish to participate in hearing session(s)

**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

