

Characterisation and Growth Strategy

Consultation 11 February 2022 to 27 March 2022

Monks Orchard Residents' Association – Comments.

Local Plan Making:

It is understood that this guidance is for Planning Authorities and Neighbourhood Planning Groups, to formulate Policies appropriate for the local areas, but not for Developers or Applicants.

The objective is to assess the local neighborhood's character, density, and infrastructure provision for proportionate and appropriate Policy requirements of future developments.

For Future Developments, Planning Officers and Applicants, the requirement is to be as simple as possible, so a comprehensive but full understanding of the important policy criteria is clear and understandable as required by NPPF para 16 d).

Planning Application Type:

There should be greater reference to the National Model Design Code and Guidance as the terminology should be common to both and reflect the same terminology as used in the National Model Design Code and Guidance for clarity of definition and for definition of policy and strategy. This "Characterisation and Growth Strategy" does NOT meet that requirement.

Who is the Guidance For?

It would be helpful if it were also aimed at assisting Developers and Applicants formulate their proposals, taking due consideration of the local "Area Types" and "Settings" to comply with the Local Planning Policy objectives.

Applicants require a brief set of criteria which they need to meet, to formulate their proposals as poring over reams of abstract policy assessment and guidance takes an inordinate amount of time when time is costly. If, after so doing, the Policy definitions are vague and subjective, and the analysis is general in policy definition, applicants are virtually none the wiser for drafting their proposals within the framework of the guidance.

Surely the objective is to be as simple as possible, so a full understanding of the important policy criteria is clear and understandable and more importantly, enforceable.

See NPPF Para 16 d)

16. Plans should:

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

Para 1.1 Growth Strategy

The main parameter for analysing growth is the "Setting" or "Area Type" which defines the "Site Area Capacity ranges" which complies with the parameter limits of the "Setting" or "Area Type." These parameters define the local "Design Code."

The National Model Design Code & Guidance¹ provides guidance for the appropriate Design Code Housing Density 'ranges' for each designation of "Area Type" or "Setting" at Part 1 Coding Process 2B Coding Plan, Figure 10 page 14, as: "Outer Suburban", "Suburban", "Urban" and "Central" which should limit the "Growth" within the "setting" or "Area Types" ranges to within recommended acceptable constraints. The NPPF at para 129 concluding sentence indicates: *"These national documents should be used to guide decisions on applications in the absence of locally produced design guides or design codes."*

The existing supporting infrastructure would only support "growth" for the current "Setting" or "Area Type." Therefore, unless there is significant improvement in supporting infrastructure for the "Area Type" or "Setting" it would be inappropriate to increase the Growth or Density within the "Area Type" or "Setting" above the setting range to the next higher "Setting" or "Area Type."

Improved infrastructure could allow densities to tend toward the higher of the "range" and for deficiency of Infrastructure provision, toward the lower of the range.

1.2 Digital Approach to Data Collection and Mapping

Para 1.2.1 Is the Geographical Information System (GIS) software accessible or available for community groups and Residents' Associations? Or are community groups and Residents' Associations required to purchase proprietary software?

2 Stage one: Characterisation survey and analysis

2.1 Engaging communities

Para 2.1.1 Residents' Associations have very little opportunity for engagement with the LPA. Our Croydon LPA assumes our concerns are invalidated by the requirement to meet Housing Need. Very little attention is given to local Character or Local Density appropriate for the supporting infrastructure or Planning Policies in the overall requirement for meeting "Housing Need". There is no evidence that Target Outturns are managed or monitored by the LPA. However, we monitor our area, and it is clear from our evidence that the targets are unmanaged and exceeded.

What pressure can be exerted on our LPAs to engage with Community Groups and Residents' Associations to rectify this inadequacy in the future?

Local Residents have virtually lost all confidence in the Local Planning Processes as a result of this prevailing attitude and it is extremely difficult to regain public confidence once lost.

2.2 Collect characterisation elements

Table 2.1.

The Elements of Character and GLA Data Sources combined for each Element of Character needs to be converted into a Policy which can guide developers and Planning Officers to recognise the criteria of character. The question posed is how are LPAs to convert this information into defined Policy for Developers understanding for their proposals and

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

Planning Officers for their assessment of determinations? We understand the production of local “Design Codes” will provide this guidance.

Unless each “Design Code” parameter is given a criterion or a quantifiable range of criterion, it is virtually impossible to comply with these requirements as “Character” can be very subjective.

Character elements listed in part A of policy D1

In addition, the Elements of character for a “Design Code” for Residential Areas should include:

- a) The Housing Density (units/ha)
- b) The Residential Density (bedspaces/ha)
- c) The local PTAL
- d) The predominant building heights
- e) The predominant set-back (Building Line)
- f) The predominant Amenity Space (Front & rear gardens)
- g) The Floor Area Coverage Ratio. (GEA/Site Area)
- h) The Site Area under consideration.
- i) The local supporting infrastructure and Public Transport Accessibility.

Other than a) to i) listed above, it is not exactly clear what has been achieved.

These identified parameters require quantifiable definition of acceptability or unacceptability as just listing them serves no useful purpose.

Once all Table 2.1 Elements have been considered, what exactly is achieved and how is the information encapsulated in a “Design Code” and subsequently, how is that information to be used to affect a development proposal.

Figure 2.1 Demographic make-up and socio-economic data

It is appropriate to appreciate areas of deprivation with the objective of improvement. Therefore, the relevant deprivation parameters should not be used as guidance in Density or other provisions as a guide to renewal.

The question for the local Planning Authority is how these areas can be lifted out of low deprivation to a more acceptable level of social-economic position. So, what would be the methodology to define the parameters of uplift of the socio-economic assessment necessary in these sorts of locations.

Figure 2.2 Housing types and tenure

It is understood that Housing types and tenure provide an understanding of established housing of an area but does that, or should that, define the housing need of an area for the future? The question for LPAs is an analysis and assessment of the aims for the future Housing Types and Tenure Types for the future developments within the area.

Figure 2.5 Urban form and structure - Housing density

Density is an important characteristic of the built environment. In addition to an assessment of building heights, typologies and building pattern, it can provide a useful analysis of an area’s-built form. Housing density can also identify areas where greater intensification may be appropriate.

Since the Density Matrix has been removed, an alternative methodology is required to ensure densities are appropriate for the “Setting” or “Area Type.” It would be extremely helpful if the LPG guidance included a methodology to define acceptable Housing and Residential Densities appropriate for the different “Settings” or “Area Types” or to accede with the published figures in the National Model Design Code “Settings” or “Area Types.”

However, the LPG does not provide any guidance on Housing or Residential Densities appropriate for an “Area Type” or “Setting” or the relationship with the appropriate level of supporting infrastructure for sustainable developments.

Figure 2.6 Existing and planned transport networks, and

Figure 2.7 Public transport connectivity

With the omission of the TfL Density Matrix from the London Plan there is absolutely no methodology of assessing Public Transport Accessibility requirement to support Development Proposals.

There is now NO defined relationship between Residential Density of a proposal to the availability of Public Transport (PTAL) in the new London Plan. A method of converting Housing Density to Residential Density can be made by the use of the National Office of Statistics² broad data of National Dwelling Occupancy of 2.39 persons per Dwelling but this is a very blunt conversion.

Since the Density Matrix has been removed, an alternative methodology is required to ensure sustainable supporting Transport Accessibility is provided to support the population densities appropriate for the “Setting” or “Area Type.” The TfL Public Transport Accessibility Level (PTAL) can still be used but without the Density Matrix to Assess relationships between Housing or Residential Density and PTAL, there is no equivalent methodology to determine a proposal’s density would be supported by adequate Public transport accessibility or provision. The TfL Connectivity Assessment Guide³ still retains the Density Matrix at Section 2.2 but it does not have the London Plan support for usage for Planning Purposes. The Design led approach is supposed to replace that need but it is not clear how this is achieved until the implementation of “Site Capacity” procedures are adequately defined.

Figure 2.8 Air quality, and

Figure 2.9 Noise levels

It would be helpful for acceptable (and unacceptable) limits of Air Quality and Noise Levels at various locations with respect to the source and observer, for planning purposes.

Figure 2.10 Open space networks and green infrastructure

It would be helpful to define guidance on the relationship between the local population’s accessibility to Open Spaces e.g., an area of Open Green Space per person and at what distances the occupants are from the available green space.

Figure 2.20 Example map of character types (also known as ‘area types’)

The “Area Types” or “Settings” bear no relationship with “Area Types,” or “Settings”

² <https://www.statista.com/statistics/295551/average-household-size-in-the-uk/>

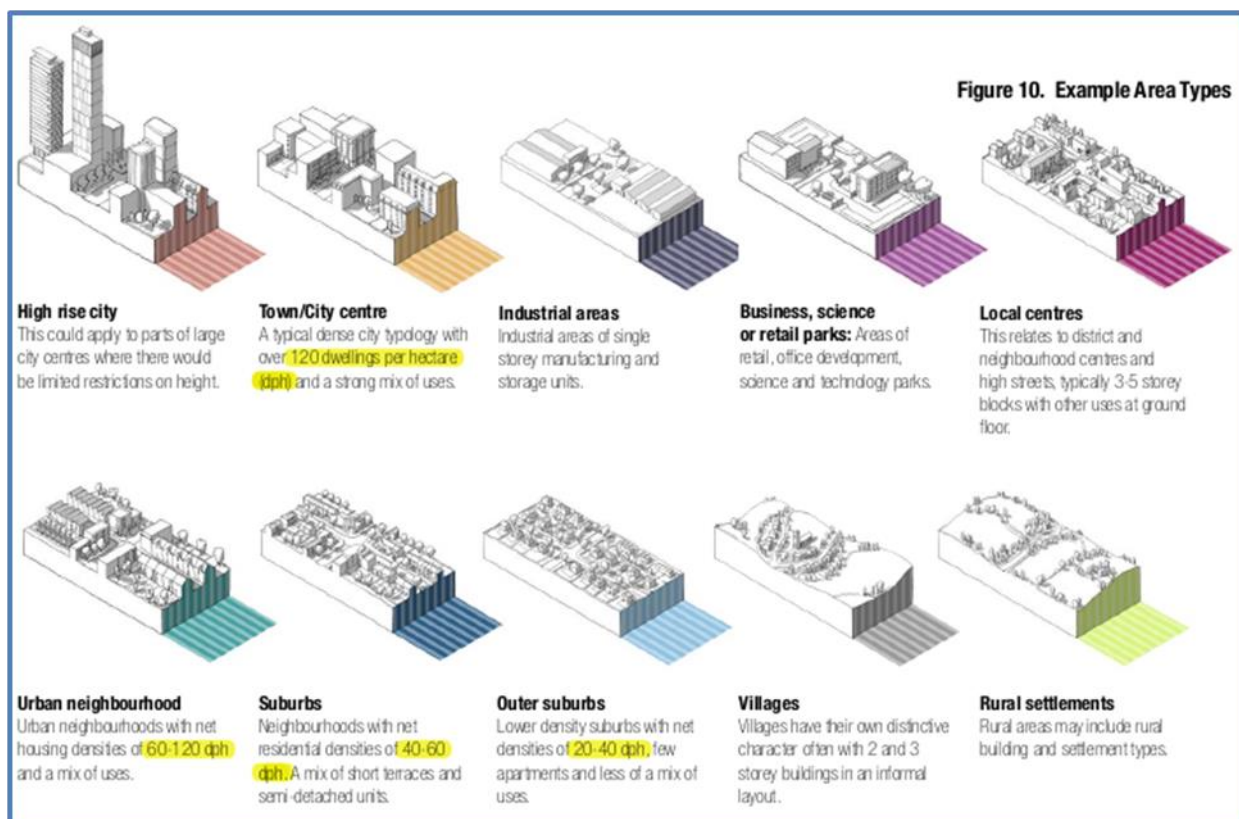
³ <https://content.tfl.gov.uk/connectivity-assessment-guide.pdf>

designated by the National Model Design Code and Guidance.

Figure 2.20 Lists:

- Basic Terrace
- Metroland Estate
- Block Dwellings
- Speculative Estate
- Mid Rise Block
- Retail Park
- Shopping Street
- Atypical

None of these have guidance parameters for assessment how the “Area Types” are to be assessed for planning guidance purposes. The National Model Design Code provides the basic parameters of “Area Type” for guidance to Applicants and community groups for appropriate important parameters, typically a range of Housing Densities and Floor Area Ratios appropriate for the “Setting” or “Area Types.” But these are different to those identified at Figure 2.20 of the LPG.



This illustration provides examples of “Area Types” and “Settings” with appropriate Housing Densities in ‘Dwellings per Hectare’ for “Outer Suburbs”, “Suburbs”, “Urban” and “Central” Settings or “Area Types” Site Capacities.

2.3 Typological approach to characterisation

The typologies of building and dwellings can be characterised into the various build structures to define local character, e.g., Houses (Detached and Semi-detached) Bungalows, maisonettes, Terraced etc.

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

3 Stage two: Character evaluation.

Why has this Characterisation and Growth Strategy not used the same approach as the National Model Design Code & Guidance, Part 1 the Coding Process?

3.1 Interpretation of data collected

3.2 Character Areas

3.3 Defining Boundaries

The definition of Boundaries of a characterisation can bridge other boundaries which can present complications when implementing strategies. Most LPAs have defined “Places” which do not have boundaries with “Wards” and therefore developments cannot easily be monitored against Housing Targets set across the “Places” as the data on planning applications relate to the Wards, not the “Place.” The comparable situation would arise with the definition of Character Areas which bridge either a Ward or a “Place.”

For Area Design Codes, the topographical types for an area need to be grouped either by Groups of Wards, a Ward, an estate of similar properties, a Post Code Group, a Post Code Area, a street or road.

Local Design Code “Setting” or “Area Type” Assessment (Example):

We have assessed our locality as shown in the following Table:

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
Shirley "Place" ¹ (approx)	770.00	?	?	?	?	?
Average	205.08	8787	3670	42.72	17.35	<Outer Suburban
All Shirley	715.20	29814	12474	41.69	17.44	<Outer Suburban
Shirley Place (Estimates)	770.00	33414	13981	43.39	18.16	<Outer Suburban

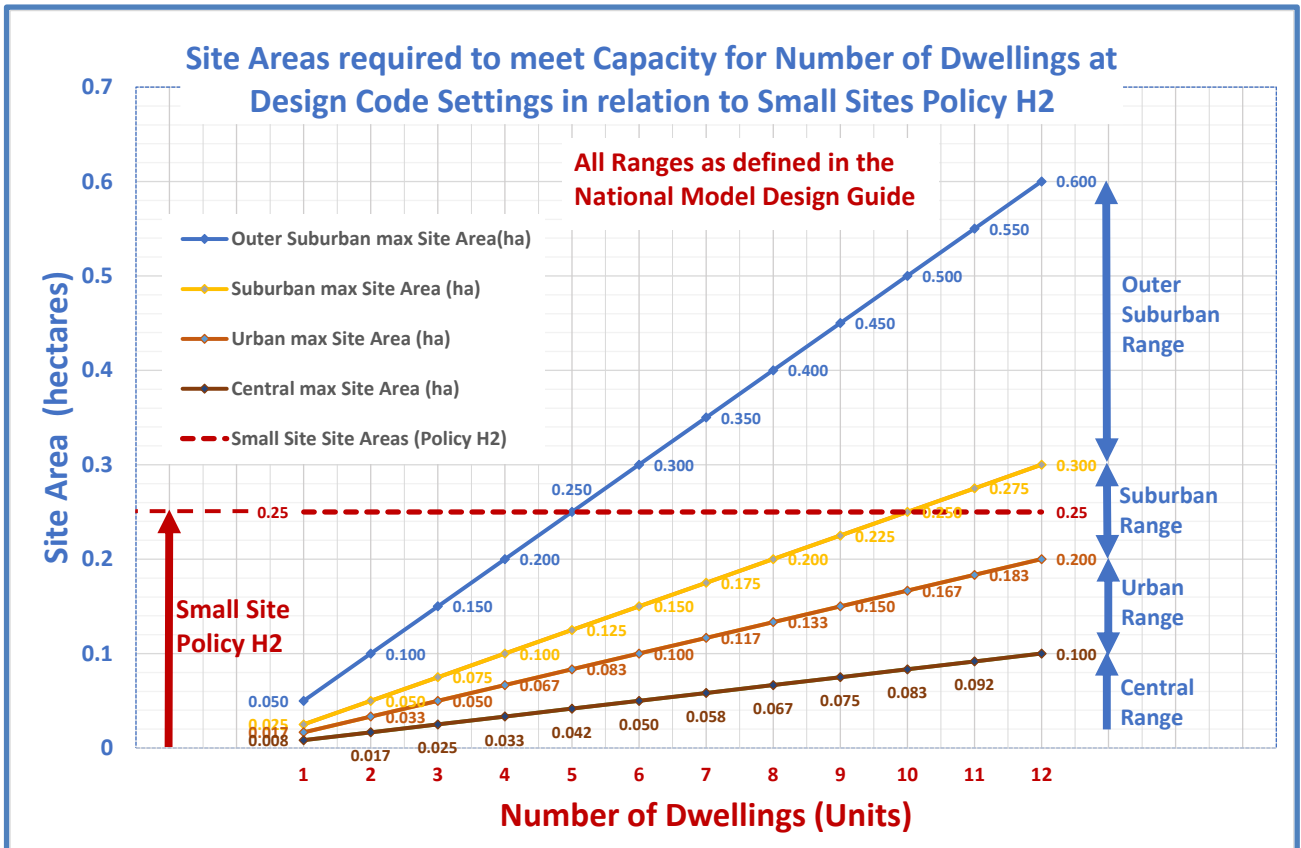
This Table indicates irrespective of the area within the MORA locality under scrutiny, the analysis shows that the area is either < or within the Outer Suburban Range “Setting” or “Area Type” [Note 1 : Estimated Area FOI request; other parameters not known!]

3.4 Quality and sensitivity assessment and mapping

Figure 3.1 Local character appraisal evaluating design quality, social and cultural significance, sensitivity to change and opportunity for growth.

GIS Mapping Software (Accurate) or Google Earth (Polygon approximate mapping) can be used to assess the Area in hectares and number of dwellings to produce the Housing Density in Units/hectare. This allows the locality “Area Type” or “Setting” to be defined and a simple assessment of the incremental number of dwellings Site Capacity in hectares for an “Area Type” or a “Setting”.

Site Capacities:												
Number of Dwellings	1	2	3	4	5	6	7	8	9	10	11	12
Outer Suburban max 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 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)	0.025	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)	0.017	0.033	0.050	0.067	0.083	0.100	0.117	0.133	0.150	0.167	0.183	0.200
Urban 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)	0.008	0.017	0.025	0.033	0.042	0.050	0.058	0.067	0.075	0.083	0.092	0.100
Central max 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 graphical illustration above demonstrates the simple linear variations of “Site Capacity” for the appropriate number of dwellings as a function of the “Setting” or “Area Types”.

The Central (Town/City Centre) Setting or Type Density will ultimately be limited by the requirement to meet the Minimum Internal Space Standards as defined in the London Plan Table 3.1. All these assessments are based upon the National Model Design Code Guidance Part 1 Coding, as depicted in Figure 10 Area Types.

The above simple methodology for assessing the maximum number of dwellings for a given “Site Area” provides the Site Capacity at the various “Settings” or “Area Types”:

- Outer Suburban max number of Units = Site Area*40
- Suburban Max number of Units = Site Area*60
- Urban Max number of Units = Site Area*120

This is simple, easily understood, and enforceable if stated in the Policy.

If an Applicant’s proposal or a Planning Officers recommendation disagrees with these Design Code Ranges at the appropriate Area Type or Setting, it would be necessary for **detailed justification** to be provided to support the **deviation** with reasons why and what would be the appropriate recommended changes, equally supported by **justification**.

It is thought that this simple analysis is a significant omission in the series of “Growth” consultation documents.

The illustration (above) only shows the “Site Capacity limitations” for a range of Dwellings from 1 through to 12 as the Small Site development proposals locally are usually limited to <10 due to the economics of providing 40% (50% London Plan) affordable homes. However, the graph could be extended proportionately to the maximum number of dwellings for a “Setting” or “Area type”.

It is noted that the “Site Optimisation” LPG does NOT contain any reference to an applications “**Site Area**”. Our understanding of the “Indicative Site Capacity Calculator” is that it provides an analysis of the parameters of an offered proposal – **NOT AN ANALYSIS OF WHAT THE ACTUAL “SITE CAPACITY” CAN SUPPORT** in terms of the available “SITE AREA” at the local “SETTING” or “AREA TYPE” or any consideration of the available supporting local infrastructure limitations. Therefore, IT IS **NOT** actually a Site Capacity Calculator but a “**PROPOSAL” CAPACITY CALCULATOR**.

(See our submission on Optimising Site Capacities).

4 Stage three: Growth strategy

4.1 Consulting the local community

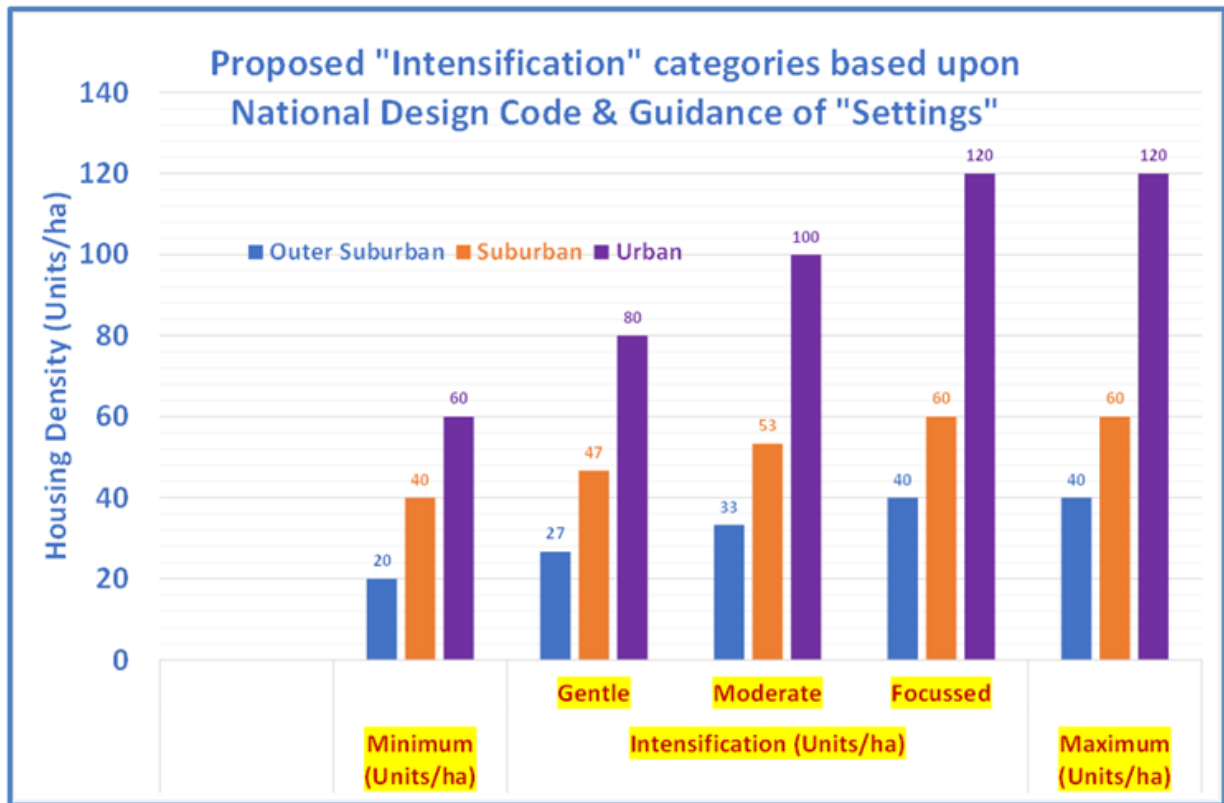
4.3 Identifying areas suitable for different levels of change and growth

The Local Plan has three designations for “Growth” viz: “Focussed Intensification,” “Moderate Intensification” and “Gentle Densification.” None of the intensification designations have any quantifiable guidance and are therefore nugatory.

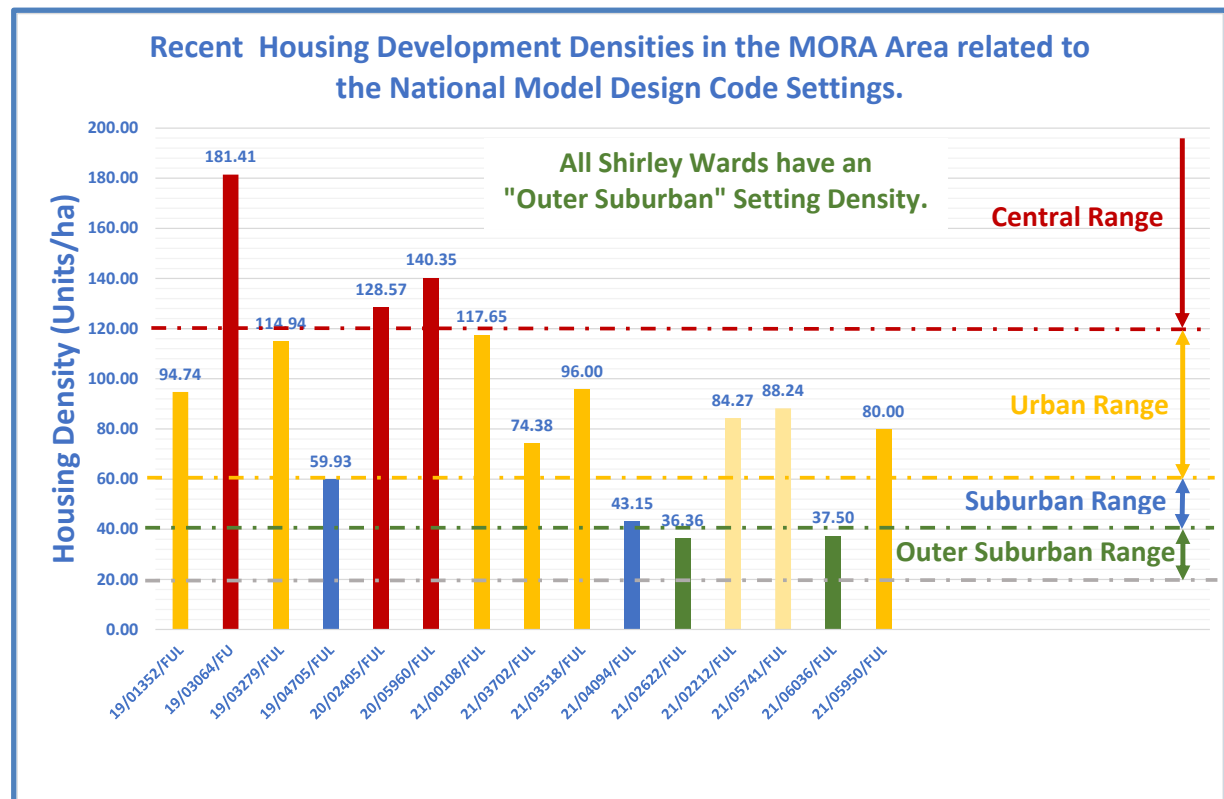
The Local Planning Authority have proposed “Focussed Intensification” areas which are currently assessed in areas of “Low” density which the LPA believe can absorb “focussed Intensification” to meet housing need (Targets). However, these areas also have low provision of supporting infrastructure and, therefore, the increases in density required by intensification would not have supporting infrastructure greater than that afforded to the current “Setting” or “Area Type.”

Such a “Focussed Intensification” Site Capacity can therefore only be increased in density to the maximum of the Density acceptable for the current “Setting” or “Area Type.” (Unless significant improvement in local supporting infrastructure is provided). We have proposed, in our submission to the Revised Local Plan consultation (Regulation 19), that the “Intensification” categories should not exceed the maximum density of its designated “Setting” to ensure the available supporting infrastructure supports that Density.

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



Suggested Ranges for the Intensification/Densification designations



Recent Development proposals for the Shirley North Ward of Croydon LPA which by all assessments is "Outer Suburban" showing Planning Officers' total lack of comprehension of the local "Setting" or "Area Type"

The Local Plan provides no guidance on the magnitude levels of Intensification or Densification appropriate for the Area Types or “Settings.” The above graphical illustration (first Graph) provides a suggested methodology to manage “intensification/densification”

The Categories “Conserve”, “enhance”, or “transform” require specific quantifiable guidance for Applicants and Planning Officers as currently, Applicants and Planning Officers have NO comprehension of the difference between current densification policies “Focussed Intensification”, “Moderate Intensification” or “Gentle Densification” (as shown in the above (second graph) Histogram), and Planning Officers and Applicants just assume any densification of the site area is acceptable as it contributes to the general requirement of meeting housing need (irrespective of whether appropriate for the locality or whether the Target has already been met or will be achieved within the life of the Plan).

The above Histogram illustrates the consequence of Applicants’ and Planning Officers’ complete disregard of the Local “Setting” of appropriate Densities in a locality which by any assessment is “OUTER SUBURBAN” as shown by the Table below.

Location	Area (ha)	Population	Dwellings (Units)	Residential Density (bs/ha)	Housing Density (Units/ha)	"Setting" for Design Code Density
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General Observations.

The objective of this guidance is for LPAs to formulate their Policies on “Characterisation and Growth Strategies”.

However, the ‘Characterisation and Growth Strategy’ is full of subjective analysis and vague objectives but very brief on defined detailed policy guidance. If policy is vague and subjective it is unlikely to be enforced or observed by either applicants or planning officers.

It is generally recommended that guidance be as simple as possible with supporting explanations of why the policy is necessary.

Any deviation from the fundamental parameters of the Policies should be supported by justification from both Applicant and/or the Determining Planning Officers. If the Policies are vague and subjective, they have no enforceable value and can be ignored or interpreted as unimportant.

What applicants require is a brief set of criteria which they need to meet to formulate their proposals as poring over reams of vague policy guidance takes an inordinate amount of time when time is costly. After so doing, they are virtually none the wiser for drafting their proposals. The enforceable Policies should be adequately defined in the London Plan rather than the Guidance as the London (Local) Plan has authoritative weight but guidance Policies have no enforceable weight.

The basic assessment of “Growth” of a locality is related to its “Setting” (Area Type). The National Model Design Code & Guidance defines the local setting (or Area Type) as either “Outer Suburban”, “Suburban”, “Urban” or “Central”.

Nowhere in the series of Consultation Documents is there any guidance on the relevance of the local “Setting” to the actual quantifiable level of “Growth”, the assessment of the available development “site capacities” or the required level of “Supporting Infrastructure” for sustainable developments.

The “Setting” has a significant contribution to the “Site Capacity” as shown in the illustrations, but this analysis and assessment strategy has been totally disregarded in the ‘Characterisation and Growth Strategy’, the ‘Optimising Site Capacity’ and the ‘Small Site Design Code’ documents which we will come onto later.

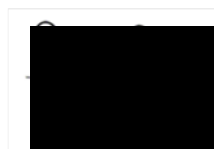
End

Kind regards

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