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**Monks Orchard Residents'
Association
Planning**

8th June 2022

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Reference: 22/01881/FUL
Application Validated: Fri 06 May 2022
Address: 46 The Glade Croydon CR0 7QD
Proposal: Demolition of single storey dwelling at 46 The Glade and development with a new building to provide 8 dwellings (Class C3), with associated amenity space, integral refuse, cycle stores and external car parking.
Status: Awaiting decision
Consultation Expiry: Thu 09 Jun 2022
Determination: Fri 01 Jul 2022
Case Officer: Christopher Grace

Dear Mr Grace

Please accept this letter as a formal objection to **Application Ref: 22/01881/FUL** for Demolition of the 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**, and redevelopment with a new building to provide **8 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 and Policies:

46 The Glade			Ref: 22/01881/FUL												
Post Code CR0 7QD Population			68	Dwellings	28	Residential Density (hr/ha)	284.31	Floor Area Ratio	0.5527	10.55%			PTAL 2011	Zero	
Units	Site Area	1020 sq.m.		Post Code	CR0 7QD	Residential Density (bs/ha)	274.51	Post Code Density	18.54	Units/ha			PTAL 2031	Zero	
8	Site Area	0.102 ha				Housing Density (U/ha)	78.43	Area Post Code CR0 7QD	1.51	ha					
Dwelling	Type	Bedrooms	Bedspaces	Habitable Rooms	Functional Areas	GIA offered (Grnd Floor Plan)	GIA Required	Built-In Storage Offered	Amenity Space Offered	Amenity Space Required	Car Parking	Probable Adults	Probable Children	Play Space Offered	Play Space Required
Flat 1	M4(3)	3	4	4	5	86.7	74.0	Not Stated	47.9	7	1	2	2	5.38	20.00
Flat 2	M4(2)	3	4	4	5	79.7	74.0	Not Stated	59.1	7	1	2	2	5.38	20.00
Flat 3	M4(2)	2	3	3	4	62.7	61.0	Not Stated	7.40	6	1	2	1	2.69	10.00
Flat 4	M4(2)	2	3	3	4	63.0	61.0	Not Stated	12.10	6	1	2	1	2.69	10.00
Flat 5	M4(2)	2	4	3	4	73.0	70.0	Not Stated	7.40	7	1	2	2	5.38	20.00
Flat 6	M4(2)	2	3	4	5	62.7	61.0	Not Stated	7.40	6	1	2	1	2.69	10.00
Flat 7	M4(2)	2	3	4	5	63.0	61.0	Not Stated	12.10	6	1	2	1	2.69	10.00
Flat 8	M4(2)	2	4	4	5	73.0	70.0	Not Stated	7.40	6		2	2	5.38	20.00
Totals		18	28	29	37	563.8	532.0	Not Stated	160.80	51.00	7.00	16	12	32.25	120

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



Front & Rear Elevations Proposed Development

- 1.1 We only object when proposals do not comply with current adopted or emerging National, Regional or Local 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 the 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 (June 2021);
 - The London Plan (March 2021)
 - The Croydon Local Plan (2018)
 - The Draft Revised Croydon Local Plan (December 2021 - Not yet adopted)
 - Supplementary Planning Guidance (SPD2) (April 2019).

Policy Assessment and Analysis

2 Growth Policies

2.1 Croydon Local Plan

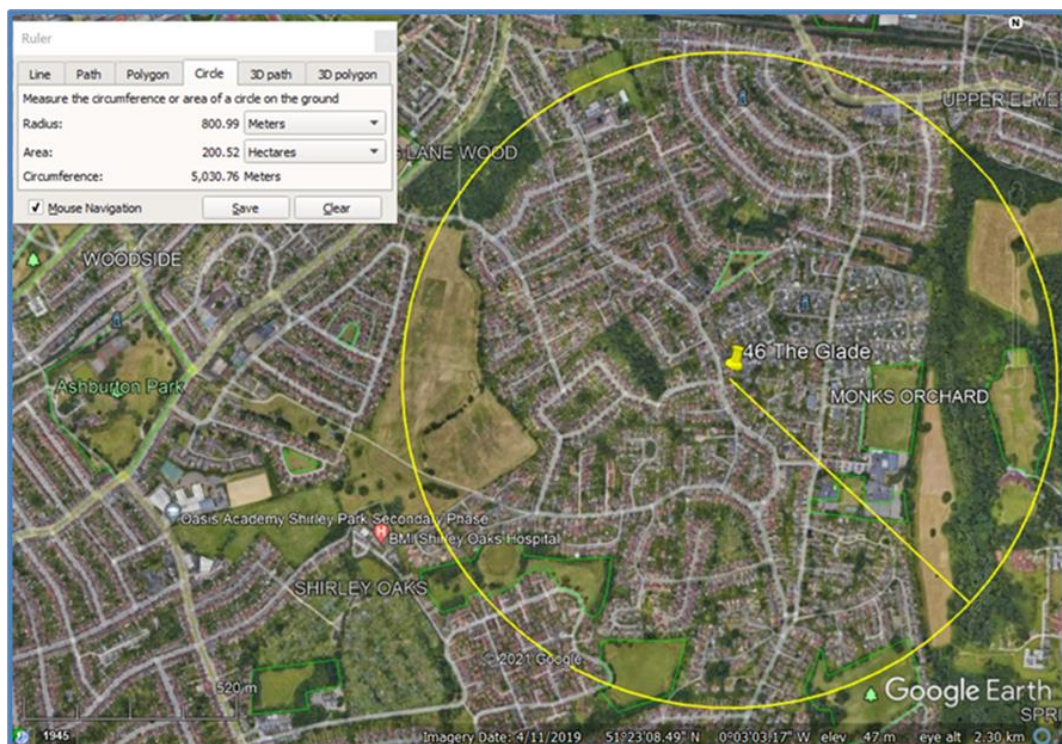
- 2.1.1 The current Croydon Local Plan (2018) '**Growth**' Policies, as defined in **Table 6.4**, DM10.1 to DM10.11 or DM34 to DM49 and DM36 to DM49 '*purports*' to describe "**Growth**" by either "**Redevelopment**" or "**Evolution**" by "**Regeneration**", but gives no definition of the acceptable 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.
- 2.1.2 Table 6.5 is just a Tick Box list with no guidance as to the magnitude of intensification and para **6.62A** refers out to guidance in the supplementary planning document, but there is no guidance on "Site Capacity" in SPD2 or the magnitude of increase in Density.
- 2.1.3 However, the **Revised Croydon Local Plan 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.*"

- a. Areas of **Focused Intensification** are areas where a step change of character to higher density forms of development around transport nodes and existing services will take place.*
- 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.”*

- 2.1.3 The locations of these designated areas are shown on the **Policies Map**, However the parameters to identify the magnitude of intensification are not provided or defined. They are therefore meaningless abstract objectives; they are **NOT** sufficiently or adequately defined Policies which could be enforced!
- 2.1.4 A Study of the location on the Policies Map indicates no defined “**growth**” - **Focused or Moderate intensification** or **densification** is appropriate at **46 The Glade** and therefore limited “**Gentle densification**” growth would presumably be appropriate for this development. However, there is no definition of what “**Gentle**” **densification** actually means.

2.2 London Plan Policy H2

- 2.2.1 The **London Plan para 4.2.2** States: *Incremental Intensification of existing residential areas within **PTALs 3-6** or within **800m** distance of a (Train/Tram) station or town (District) centre boundary;*



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

- 2.2.2 As 46 The Glade has **PTAL at Zero** and is greater than >800m from a **Train/Tram Station** or **District Centre**, this location is completely and utterly inappropriate for **“Incremental Intensification”** and could only be considered appropriate for extremely **“Gentle”** densification”. We have assessed the appropriate level of “Gentle Densification” later in this submission based upon the National Model Design Code Guidance, in recognition of NPPF para 129 recognised procedure in the absence of any Local Policy guidance on this “Growth” assessment and analysis.

2.3 The NPPF.

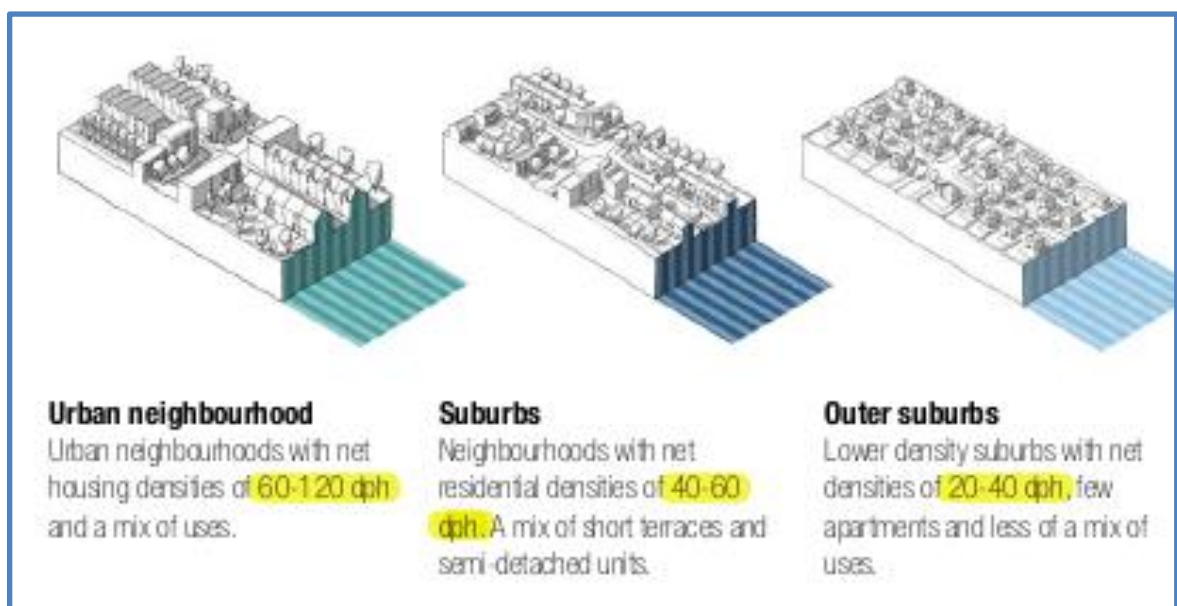
- 2.3.1 We have investigated the National Policies to define acceptable levels of density based upon the **NPPF** in the **National Model Design Code & Guidance**.

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

2.4 The LUHC National Model Design Code & Guidance Parts 1 & 2.

- 2.4.1 The ‘Settings’, ‘Outer Suburban’, ‘Suburban’, ‘Urban’ and ‘Central’ are defined in the **National Model Design Code** Part 1 The Coding Process 2B Coding Plan Fig10 Page 14.



The National Model Design Code Parameters Definitions for Local Settings.



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

Tabular illustration of Site Capacities for each Design Code Area Type or Setting and for incremental number of Housing Units (dwellings)

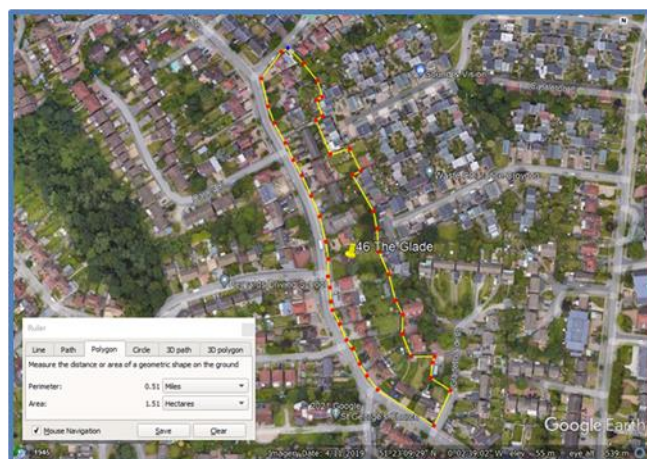
2.4.2 The Table above provides the ranges of ‘Site Capacities’ (ha) in terms of the **number of dwellings** and **Site Area** (ha) for each of the ‘Settings’ – ‘Outer-Suburban’, ‘Suburban’, ‘Urban’ and ‘Central’ as defined by the Department of LUHC **National Model Design Code & Guidance Parts 1 & 2**.

2.4.3 As indicated in **NPPF para 129**, in the “*absence*” of locally produced **Design Guides** or **Design Codes** in the current adopted **Croydon Local Plan (2018)** or the **Draft Revised Local Plan** (Dec 2021), the ‘Settings’ defined in the **National Documents** should be used to “*guide decisions on applications*”. The Table above and Graphical illustration below provides the Site Capacities for the **Design Code Housing Density** (Units/ha) over the range **0 to 9 dwellings** for **46 The Glade**. The **Housing Density** for **8 Units** on a **Site Area** of **0.102ha** equates to **78.43Units/ha** which requires an **Area Type Design Code Setting** within the **mid Urban Range**.

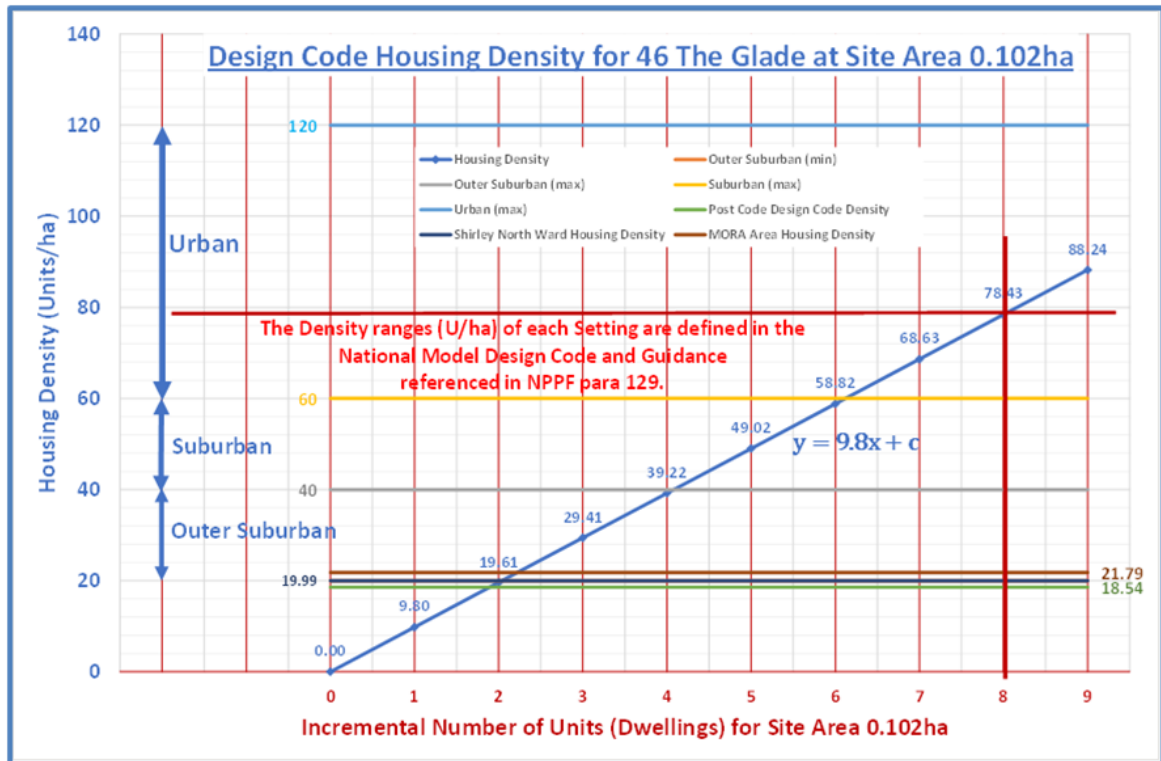
Design Code Area	Area (ha)	Population	Dwellings	Housing Density (Units/ha)	Residential Density bs/ha	Setting (as defined by the National Model Design Code)
Shirley North Ward	327.9	15666	6555	19.99	47.78	< Outer Suburban
Shirley South Ward	387.3	14147	5919	15.28	36.53	< Outer Suburban
Shirley	715.2	29814	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!

Tabular Assessment and Analysis of Local Area Design Code Area Type and Settings

2.4.4 The locality assessed against various examples of **Design Codes** of the **local Areas** to show that the prevailing local **Design Code ‘Setting’** for the locality is **well within** the prescribed parameters for “**Outer Suburban**” (or **Outer London Suburban**) **Setting**. However, the analysis clearly demonstrably shows the required **Design Code Housing Density** in the mid-range of an **Urban Area Type Setting** of **60 to 120 Units/ha** at **78.43U/ha**.



- 2.4.5 The required Density appropriate for **8 units** on a **Site Area of 0.102ha = 78.43Units/ha** would require infrastructure appropriate to support a **Mid-Range Urban Density**. The Public Transport Accessibility at **46 The Glade** has **PTAL 0 (Zero)**, but the supporting infrastructure barely supports the existing **“Outer Suburban”** Area Type Setting and there is no prospect of improvement over the life of the plan.



Graphical Illustration of Site Area Capacity ranges (ha) for
46 The Glade at 8 Units

2.5 London Plan

2.5.1 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 densities¹**), and that best delivers the requirements set out in **Part D.**”

Policy D3 Para 3.3.2 *“A **design-led approach** to optimising **site capacity** should be based on an **“evaluation”**² of the **site’s attributes**, its surrounding context and its **capacity for growth** to **determine the appropriate form of development for that site**.”*

¹ https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf

² Definition of “**evaluation**”: The making of a judgement about the **amount, number, or value** of something.

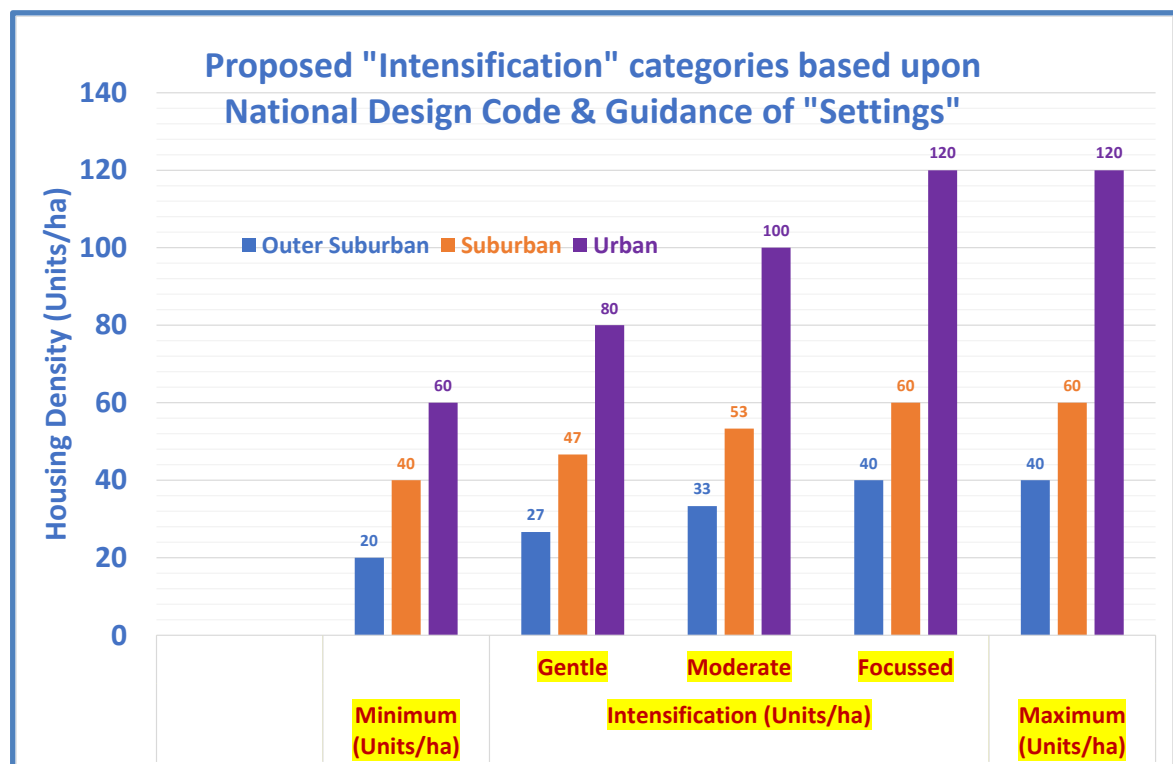
Policy D3 Para 3.3.4

*“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.”*

Policy H2 Para 4.2.5.

*“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.”* (The issue is there is NO definition of the magnitude of “incremental,” but a definition should be defined in the **Design Code**).

- 2.5.2 As the **National Model Design Code** Area Types exist on the availability of supporting infrastructure, any intensification within an Area Type or Setting relies on the **existing Supporting infrastructure** and therefore the **Design Code Density** should remain within the Setting or **Area Type “Ranges”** as defined (Outer Suburban, Suburban, Urban or Central). It is suggested that **poor infrastructure** would require the **Design Code Density** to **tend toward the lower value**, and, **higher infrastructure** provision **tend toward the higher** of the **Setting Range**. Similarly, the **Intensification** or **densification** should follow the same principles as follows:



Suggested limits of Intensification for “Gentle,” “Moderate” & “Focussed” for each Area Type or Setting

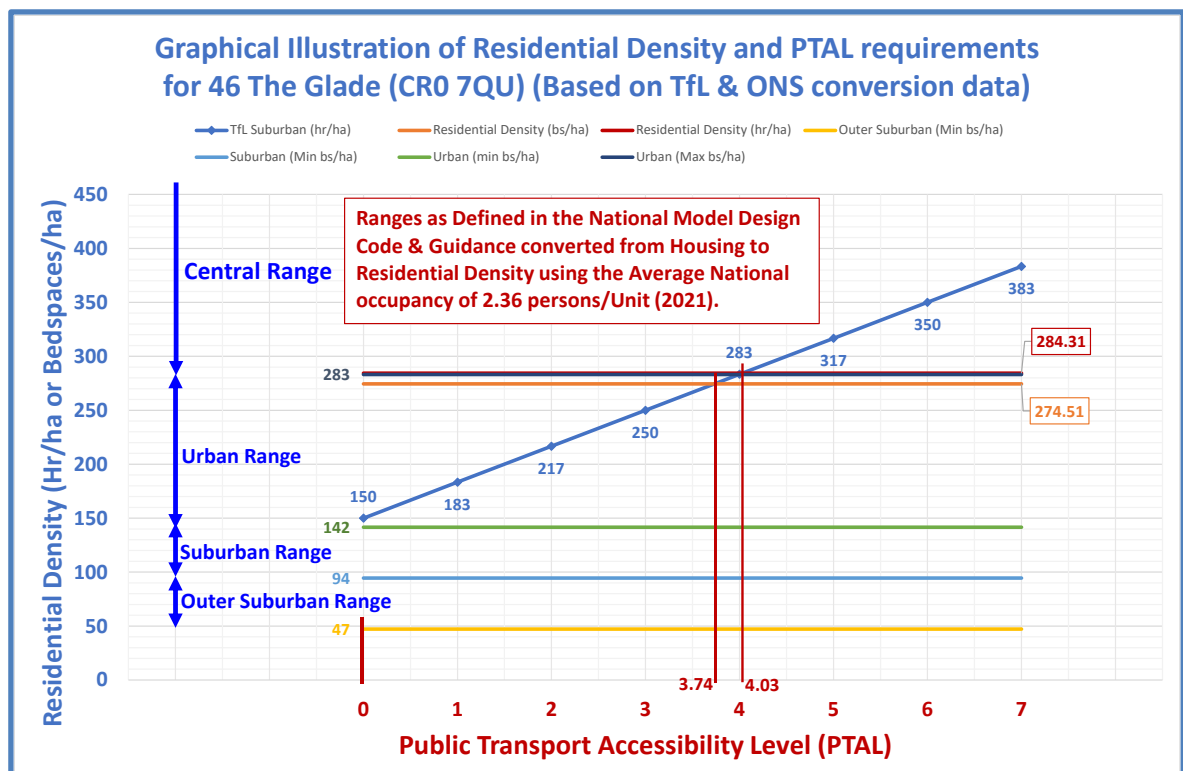
2.5.3 We have shown an **incremental** increase in **Design Code Density** of $\frac{1}{3}$ & $\frac{2}{3}$ between Settings for “**Outer Suburban**”, “**Suburban**” and “**Urban**” for “**Gentle**”, “**Moderate**” and “**Focussed**” Intensification or densification. There is **NO** equivalent for “**Central**” Area Type setting, as there is NO defined maximum. The Maximum Density at “**Central**” Area Types or Settings is defined by the proposal’s requirement to meet the **Minimum Internal Space Standards** and **Private Amenity Standards**. This is our interpretation of Local Plan Policy as there is no meaningful guidance in the Croydon Revised **Local Plan** or the **London Plan**.

2.5.4 Thus for **46 The Glade**, the “**Gentle**” **Densification** should NOT exceed a housing Density **>27Units/ha** but it actually reaches **78.43Units/ha** which is $(78.43-27)/27 = \mathbf{190.48\%}$ increase above the “**Gentle**” **densification** appropriate for the locality. This is clear evidence of excessive overdevelopment of the locality for the proposed development at **46 The Glade**.

2.6 Residential Design Code Density

2.6.1 The Residential Density as measured in habitable rooms per hectare or bedspaces per hectare are **284.31hr/ha** and **274.51bedspaces/ha**.

2.6.2 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. There is no guidance provided for this parameter so we should investigate an appropriate range for each setting



Graphical Illustration of Residential Density and Public Transport Accessibility Level (PTAL) for the proposed development at 46 The Glade.

2.6.3 The TfL Density Matrix has been omitted from the Revised **London Plan** but is retained for the **Public Transport Accessibility Level (PTAL)** assessment using the **TfL WebCAT** ³. The equivalent **Residential Density** appropriate for **Suburban Settings** has a range of **150 at Zero PTAL** to **350 at PTAL 6**. If we assume that the range is **incrementally linear**, we can extrapolate what **PTAL** would be required for the proposed development with a **Residential Density 284.31hr/ha or 274.51bedspaces/ha**.

2.6.4 Assuming a linear progression, the required **PTAL** for the proposal is found by:

$y = mx + c$ where $y = \text{Density}$, $m = \delta y / \delta x$, $x = \text{PTAL}$ and $c = y$ when $x = 0$ (intersect)

thus: $\text{Density } y = \frac{383-150}{6} * x + 150$

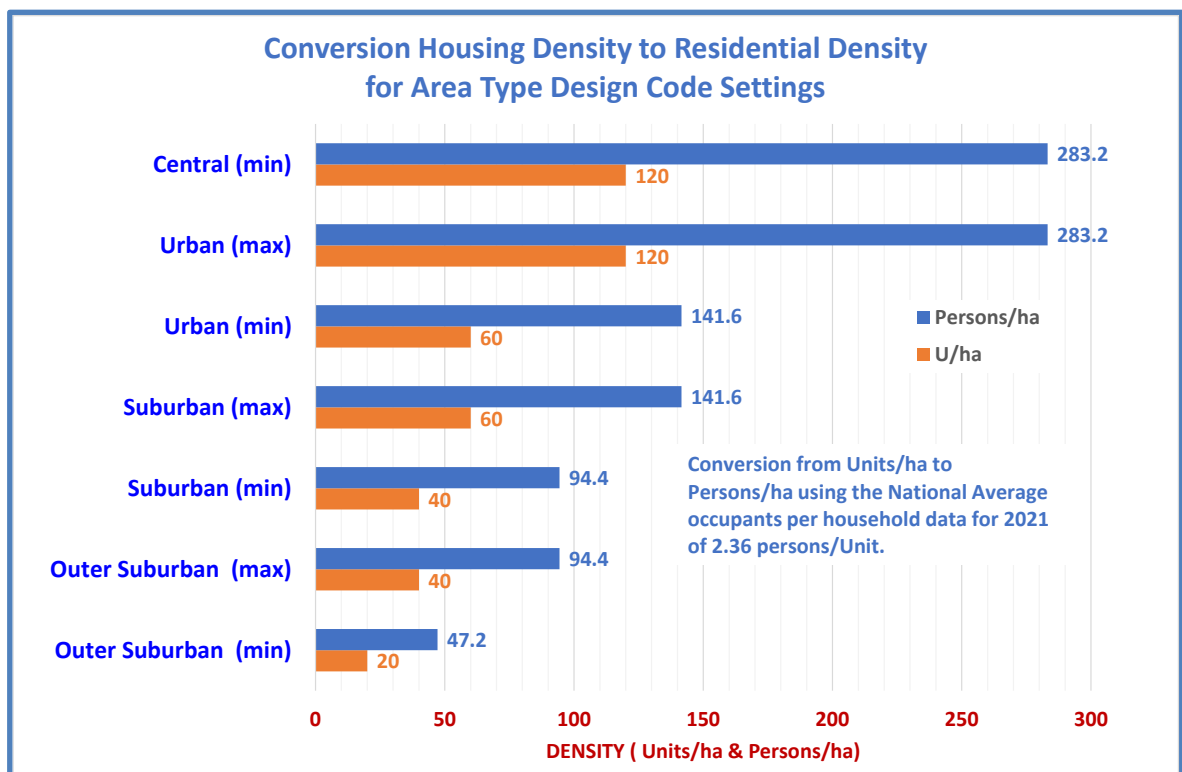
therefore: $\text{Density } y = 33.33x + 150$

For Residential Density of **284.31hr/ha**: $\frac{284.31-150}{33.33} = x = \text{PTAL} = \mathbf{4.029}$

Or Residential Density of **274.51Bedspaces/ha**: $\frac{(274.51-150)}{33.33} = x = \text{PTAL} = \mathbf{3.735}$

When the Actual available PTAL is precisely Zero (0)

2.6.5 It is also apparent that the **Residential Density** of the **Post Code Area** is **28 units with occupancy of 68 person** therefore the **average occupancy/unit is 28/68 \approx 2.43**.



**Conversion of Housing Density (Units/ha) to Residential Density (Bedspaces/ha)
using National Average occupancy of 2.36⁴ persons/Unit.**

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



2.6.6 As the **National Design Code Guidance** provides **National Guidance** and the **Local Plan** does **NOT** provide **ANY** guidance, it is reasonable to assess the **PTAL** on **National figures**. The graphical illustration above uses a conversion of **2.36⁴ Person per Unit** to convert **Housing Density to Residential Density** based on those **National parameters**.

2.6.7 The above analysis clearly establishes that the proposed development would require a **PTAL** of approaching **≈3.75** or **≈4.1** when the available **PTAL** is **Zero (0)** and that the **Residential Density** is more appropriate for a “**Central/Urban**” **boundary Setting** than an **Outer Suburban Setting** which is further clear evidence of a significant **over-development** or inadequate **Site Capacity** to support the proposed development.

2.7 Floor Area Ratio

2.7.1 A further parameter for establishing the appropriateness of a proposed **Density** for the **Area Type Design Code** Setting, is the **Floor Area Ratio (FAR)**. For **Suburban** Area Type Settings, the recommended **FAR** as defined in the **National Model Design Code and Guidance** and as measured by **GIA/Site Area** in sq.m. **should be NO Greater than 0.5**. The proposed development has a **Floor Area Ratio (FAR)** of Residential GIA/Site Area of $563.8/1020 = 0.5527$ which is $(0.5527-0.5)/0.5 = 0.1054$ i.e., **≈10.5%** above the recommendation and further evidence of over development of the **Site Capacity**.

2.7.2 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 Statista⁵ data. In 2021, the average number of people per household in the United Kingdom was 2.36. We can use this as a factor to convert equivalent Units/ha to Bedspaces/ha as shown in the following Graphical illustration.

3 Housing quality and standards.

3.1 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 **8 Flats**. **The Dimensions are “NOT stated.”**

3.2 Play Space for Children:

3.2.1 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*

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

⁵ <https://www.statista.com/statistics/295551/average-household-size-in-the-uk/>

- 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 ...”*

3.2.2 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 10m² 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 ...”*

3.2.3 The current Croydon Local Plan at para 6.54 states:

6.54 *“The minimum standard of 10m² 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 10m² of dedicated play space per child.”*

3.2.4 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 10m² 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 8 Units is being deprived of Play Space on very questionable reasons. This has been removed from the Revised (2021) version but is not yet adopted

Play Space for Children				
Dwelling	Probable Children	Play Space Offered	London Plan Play Space	Play Space Deficient
Flat 1	2	5.375	20	14.625
Flat 2	2	5.375	20	14.625
Flat 3	1	2.6875	10	7.3125
Flat 4	1	2.6875	10	7.3125
Flat 5	2	5.375	20	14.625
Flat 6	1	2.6875	10	7.3125
Flat 7	1	2.6875	10	7.3125
Flat 8	2	5.375	20	14.625
Totals	12	32.25	120	87.75

3.2.5 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.

3.2.6 **DM1A.1** All proposals for new residential development will need to provide private amenity space that:

- Is of high-quality design, and enhances and respects the local character
- Provides a minimum amount of private amenity space of 5m² per 1-2 person unit and an extra 1m² per extra occupant thereafter; and it must achieve a minimum depth and width of 1.5m
- Provides functional space with a minimum width and depth of balconies should be 1.5m
- All** developments need to provide a minimum of 10m² per child of new play space, calculated using GLA's population yield calculator

All new developments with 5 or more residential units should provide a minimum of 50 square metres of communal space with a further 1 square metres per additional unit thereafter.

3.2.7 The evidence in the above table indicates a deficiency of Play Space for the probable number of children to be **87.75m² which is a deficiency by:**

$$(87.75-120)/120 = - 0.26875 = \textbf{-26.875\%}.$$

3.2.8 The Play Space for children and the communal open space for the occupants of the proposed development are **NOT separated or defined** and there is **NO play equipment** provided within the **Play Space** allocated.

4 Parking

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

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
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"> 1 space per unit for 1 and 2-bedroom homes 1.5 space per unit for homes with 3 or more bedrooms

Extract from of the Revised Croydon Plan - Table 10.1 Residential Parking

4.1.2 The Revised Draft Croydon Local Plan calculates Residential Parking spaces at locations of PTAL 0, 1a & 1b at 1 space per Unit for 1 & 2-Bedroom Dwellings and 1.5 spaces for Homes with 3 or more Bedrooms in areas with no controlled Parking,

4.2 The **London Plan Policy T6** on **Residential Parking** quotes at **Table 10.3** for **Outer London** at **PTAL 0** localities have a maximum parking provision of up to **1.5** parking spaces for any number of Beds(rooms).

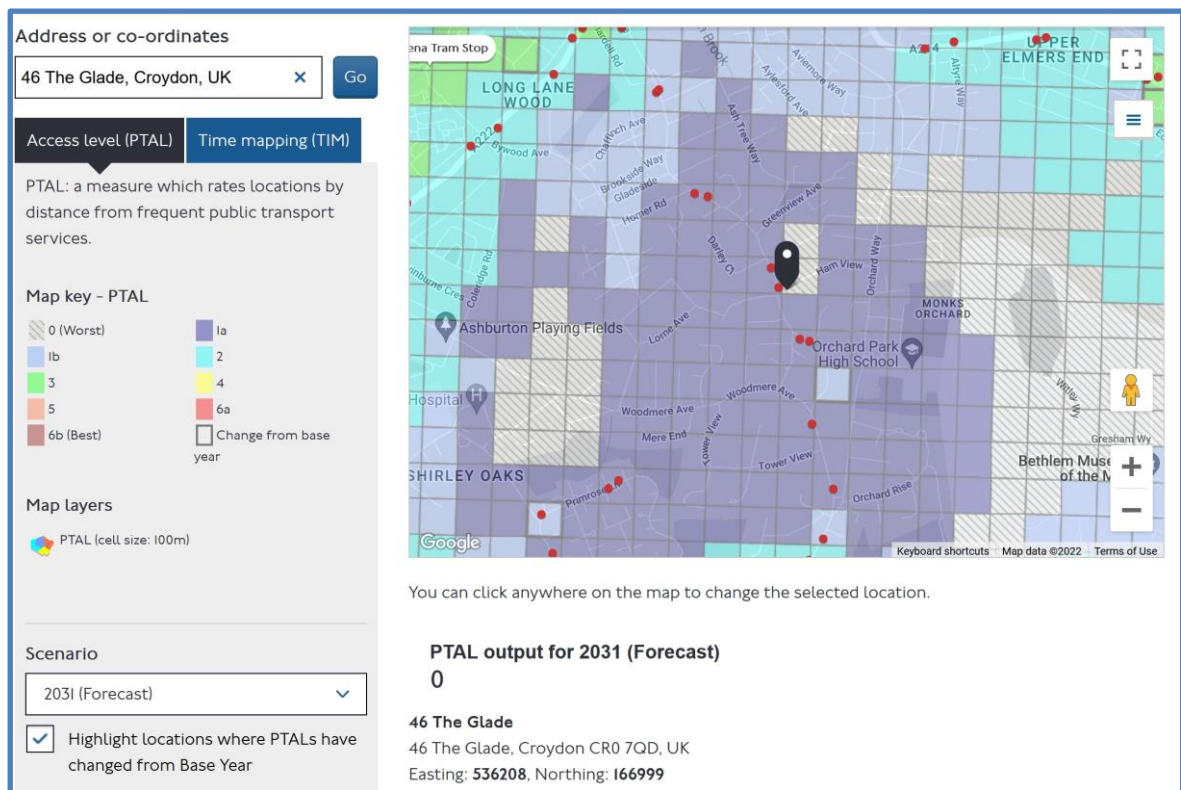
4.2.1 The analysis shows that for new developments in areas without controlled parking Zones and at **PTAL Zero**, would be **9 spaces** for the Revised draft **Croydon Local Plan Policy DM30 Table 10.1** which would result in an overspill of 2 cars overnight and for the London Plan policy T6.1 at Table 10.3 would require up to **12 spaces** resulting in an overspill of 5 cars overnight parking on side streets.

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.

- 4.3 From this analysis, the Residential Parking provision is inadequate for an **eight flatted development** at a **PTAL Zero** locality and therefore the proposal should be rejected as it would likely generate at least **2** car overspill (Revised Local Plan) onto adjacent streets or **5** car overspill (London Plan). This does NOT include any possible commercial vehicle or Vans possibly parked overnight for the purposes of occupants' work activity or business occupation. This overspill would be extremely hazardous if any 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.
- 4.4 It is noted that the “**Vision Transport assessment**” **Parking Assessment Report** of 28th **April 2022**, 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 shown by the downloaded interrogation of the **TfL WebCAT forecast up to 2031**.
- 4.4.1 The Transport Statement concludes the overnight Parking Stress at **para 4.22** to be **34%** to 40% with a peak stress during daylight hours of **48%**. However, this does not include other possible contributions to Parking stress for other local development applications which are currently proposed.

Parking Standards				
Dwelling	Bedrooms	Bedspaces	Residential Parking London Plan PTAL 0 - 1	Residential Parking Revised Local Plan ¹ (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	1.0
Flat 4	2	3	1.5	1.0
Flat 5	2	4	1.5	1.0
Flat 6	2	3	1.5	1.0
Flat 7	2	3	1.5	1.0
Flat 8	2	4	1.5	1.0
Totals	18	28	12.0	9.0
Parking Provided			7.0	7.0
Probable overspill			5.0	2.0
Percentage under provision			71.43%	28.57%
1 All Homes in an area with no controlled Parking Zone (Table 10.1)				

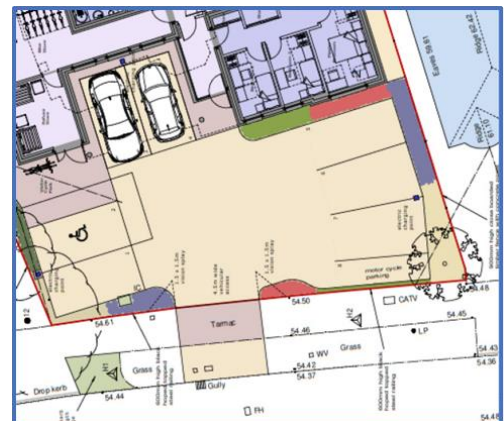


TfL WebCAT showing the PTAL at 46 The Glade as Forecast to 2031 at PTAL 0

- 4.4.2 Although the proposal at **81 The Glade Ref: 21/00108/FUL** has been refused, the applicant has appealed that decision, **Ref: L5240/W/21/3286648**, and that application if allowed by the Inspectorate would contribute to local parking Stress.

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 all other bays occupied, with reverse and forward manoeuvres but confirmation by provision of Swept Path Diagrams would be appropriate to confirm acceptability.



9 Targets

9.1 The Revised Local Plan (6th December 2021)

- 9.1.1 **Planning Officers and Committee members** quote the need for housing as a **prime objective** of planning approvals even when **non-compliant to planning Policies**.
- 9.1.2 The **Revised Croydon Plan** has revised targets 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**.

9.1.3 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.”**

9.1.4 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
Total	21	150	129
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

9.2 Development Management

9.2.1 The recommended methodology to manage increased Housing Units within the acceptable Targets build out per year and to maintain the local character is to enforce those development proposals to meet all the parameters of the **Design Codes** for the area and to implement the **London Plan “Design-Led Approach”** to ensure each proposal is within the **“Site Capacity”** requirements which is a fundamental objective of the Job Description of **“Development Management”**.

10 Summary and Conclusions

10.1 There is one reference at para 4.15 of the revised (2021) Croydon Local Plan of the London Plan Policy **“Design-Led Approach”** but nowhere does the revised Local Plan provide any guidance as to the assessment of the implementation methodology of the **“Design-Led Approach” Policy D3 or H2**.

10.2 There are only **two occurrences** or references to **“Design Codes”** in the **Revised (2021) Local Plan** at **Policy DM38: Croydon Opportunity Area** at **Paras DM38.1 & DM38.2**. Again, although not relevant to this location, there is no guidance as to the assessment of the implementation methodology of the **“Design-Led Approach” Policy D3 or H2**.

10.3 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**.

10.4 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** which we have provided herewith.

10.5 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” or “Site Capacity”** for this proposal.

10.6 **Clear and precise justification should be provided if these policies are disregarded.**

- 10.7 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 to be stated in the recommendation report.
- 10.8 In addition, if these Policies are not considered appropriate, we request realistic detailed **justification** as to why the **National Policy guidance** does **NOT** apply to Croydon, in the absence of locally defined design codes, and if alternative parameters were considered appropriate for determining the **Site Capacity**, we request they be defined with **justifiable criteria and reasoning**.
- 10.9 The offered **Housing Density** of the proposal is **88.24Units/ha** which is a Setting of **Mid-Urban Range** but with public transport access level (PTAL) of Zero which is inappropriate for an Urban Area Type Setting. **46 The Glade**, by **all** our assessments of the locality **Design Code**, is within the lower of the range of an “**Outer Suburban**” Setting. 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**.
- 10.10 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.
- 10.11 Public Transport Accessibility.**
- 10.11.1 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**. The applicant still presumes the local **PTAL** to be **1a**.
- 10.12 Housing quality and standards.**
- 10.12.1 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 **8 Flats**. The Dimensions are NOT stated, however the excess GIFA may compensate for this omission but requires full assessment.
- 10.13 Play Space**
- 10.13.1 The evidence indicates a deficiency of Play Space for the probable **12 children** to be **87.75m²** which is a deficiency of $(120-32.25)/32.25 = 0.270 = 27\%$.
- 10.14 Parking**
- 10.14.1 It is noted that the “Vision Transport Assessment” Parking Assessment Report of **13th August 2021** 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 shown at TfL WebCAT forecast up to 2031.



10.14.2 The analysis shows that for new developments in areas without controlled parking Zones and at **PTAL Zero**, would be **9 spaces** for the Revised draft **Croydon Local Plan Policy DM30 Table 10.1** and **12 spaces** for the **adopted London Plan Policy T6.1 Table 10.3** when only **7** are provided.

10.15 Parking Accessibility

10.15.1 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.

11 Recommendation

- 11.1 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 exceeds Site Capacity for 0.102ha at this Setting and locality.
- 11.2 The Targets for the Shirley "Place" have been exceeded in just the MORA Area and therefore Housing Need for the Shirley North Ward has already been satisfied.
- 11.3 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



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Head of Development Management
Shirley North Ward
Shirley North Ward
Shirley North Ward

Bcc:

MORA Executive Committee, Local affected Residents & Interested Parties