

Mr Christopher Grace - Case Officer

Development Management
6th Floor
Bernard Weatherill House
8 Mint Walk
Croydon
CR0 1EA

**Monks Orchard
Residents' Association
Planning**

8th August 2022

Emails: dmcomments@croydon.gov.uk
development.management@croydon.gov.uk
christopher.grace@croydon.gov.uk

Emails: planning@mo-ra.co
chairman@mo-ra.co
hello@mo-ra.co

Reference:	22/02598/FUL
Application Received:	Mon 20 Jun 2022
Application Validated:	Mon 20 Jun 2022
Address:	21 Woodmere Gardens Croydon CR0 7PL
Proposal:	Demolition of single-family dwelling and garage and the erection of one storey semi-detached houses with accommodation in the roof space, comprising of 2 dwellings and 2 off street, car parking spaces and a detached 2-storey building with accommodation in the roof space, comprising of 5 self-contained apartments with intergraded bike and refuse stores and 6 off-street, car parking spaces.
Status:	Awaiting decision
Case Officer:	Christopher Grace
Consultation Close:	Fri 19 Aug 2022
Decision Deadline:	Mon 15 Aug 2022

Dear Mr Grace

Please accept this letter as a formal objection to Application **Ref: 22/02598/FUL** for Demolition of single-family dwelling and garage and the erection of one storey semi-detached houses with accommodation in the roof space, comprising of 2 dwellings and 2 off-street, car parking spaces and a detached 2-storey building with accommodation in the roof space, comprising of 5 self-contained apartments with intergraded bike and refuse stores and 6 off-street, car parking spaces.

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

On **31st July**, we requested clarification by email regarding the short **Consultation** period from 'Notification' on the Public Register on **1st August** with close of consultation on **19th August** when the statutory requirement is **21 days**. This is extremely short notice for submissions at a time of "Holiday Period" when affected residents could be unavailable. It was unclear why the decision deadline was listed as **15th August** when consultation close was listed as **19th August**? Also, the **"Elevation Front"** & **"Elevation Side"** drawings were **unavailable** for fully downloading. However, we have had no response to these queries to date!

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

1 Existing:

21 Woodmere Gardens						
Existing	Site Area	1210	sq.m.			
	Site Area	0.121	ha			
	Dwellings	Bedrooms	Bed Spaces	Habitable Rooms	Car Parking	GIA (sq.m.)
21 Woodmere Gardens	1	2	4	5	2	137
Residential Density	41.32	hr/ha	Car Spaces per occupant			0.50
Residential Density	33.06	bs/ha	Floor Area Ratio			0.11
Housing Density	8.26	U/ha				

2 New Proposal Ref: 22/02598/FUL

21 Woodmere Gardens Ref: 22/02598/FUL New 30/07/22	Units	7		Residential Density		210.74	hr/ha	Floor Area Ratio		0.44		PTAL	2011	Zero	
	Site Area	1210	sq.m.	Residential Density		214.88	bs/ha	Site Area Ratio		0.44		PTAL	2021	Zero	
	Site Area	0.121	ha	Housing Density		57.85	unit/ha	Footprint Area		535.40		PTAL	2031	Zero	
New Dwellings	Floor	Bedrooms	Bed Spaces available (Persons)	Habitable Rooms (*)	GIA Offered	GIA Required	Built-In Storage offered (Note1)	Built-In Storage Required	Private Open Space offered (sq.m.)	Car Parking Space	Disabled Bay or Electric Charging Point (**)	Cycle Store	Estimated Number of Adults	Estimated Number of Children	
	Apartment Unit 1 (M4(3))	Ground	2	4	3	87	70	2.0	2.0	44	2	1 Db	2	2	2
	Apartment Unit 2 (M4(2))	Ground	1	2	3	57	50	2.0	1.5	36	1	-	2	2	0
	Apartment Unit 3 (M4(2))	First	3	4	4	78	74	2.0	2.5	8	1	-	2	2	2
	Apartment Unit 4 (M4(2))	First	3	4	4	78.5	74	2.0	2.5	7	1	-	2	2	2
	Apartment Unit 5 (M4(2))	Second	2	4	3	73	70	2.0	2.0	7	1	-	2	2	2
Semi-detached Unit 6	Ground	0	0	2.5	81.2	70	1.5	2.0	53.0	1	-	2			
	First	2	4	2			1.5		32.5						
Semi-detached Unit 7	Ground	0	0	2	81.2	70	0.0	2.0	29.5	1	-	2			
	First	2	4	2			1.5		16.0						
Totals		15	26	26	535.4	478.0	14.5	14.5	233	8	(**)	14	14	12	
* 0.5 Habitable Room open plan Kitchen/Dining/Lounge						Car Spaces per occupant		0.31	Block Area (A) GIA			373.00	sq.m.		
Average hr/unit		3.64	hr/u				Car Spaces per adult		0.57	Block Area (B) GIA			162.40	sq.m.	
Note 1		Excluding Wheelchair Storage (Unit 1)								Total			535.40	sq.m.	
(**) The seven new dwellings will be provided with 8 off-street parking with Electric Vehicle Charging (EVC) in accordance with the minimum policy requirement.															

3 General Observations:

3.1 The applicant has assessed the responses to the previous proposal refused by the LPA and to which the applicant has appealed and has reduced the number of **dwellings** in this second proposal from **Nine** to **Seven** which reduces the **Housing Density** from **74.38 Units/ha** to **57.85 Units/ha**. However, this reduction in **density** is just below the lowest threshold for an **Urban Area Type Setting** of **60 Units** per hectare by just **2.15U/ha** and is therefore just within the **“Suburban” Area Type Setting** of **40 to 60 Units/hectare** as defined by the **National Model Design Code & Guidance**. We comment on this reduction in Housing Density in relation to supporting infrastructure later in our submission.

3.2 Local Character

3.2.1 All existing dwellings in Woodmere Avenue Fronting Ashburton Playing Fields are single-storey bungalows therefore the proposed Semi Detached Dwellings of one-storey with accommodation in the roof space do **NOT** respect the local character. All existing dwellings in Woodmere Avenue Fronting Ashburton Playing Fields are single-storey bungalows as shown in the illustration.



3.2 Built-In Storage:

3.2.1 Apartments 3 & 4 both have **2.0m²** In-built storage when the **MINIMUM** requirement for **3b4p** dwellings at London Plan Policy D6 Minimum Space Standards Table 3.1 requires **2.5m²** storage capacity. The London Plan emphasises that Table 3.1 storage requirements are a “**minimum**” which should be exceeded if possible and the Supplementary Planning Guidance suggests a **5%** increase above the Table 3.1 minimum should be considered. Thus, not meeting the **minimum** requirement is **unacceptable**.

3.2.2 The **Semi-detached Unit 7** is proposed to have **1.5m² In-Built Storage** on the first floor but unlike **Unit 6**, does not have the additional **1.5m²** In-Built Storage on the Ground Floor and is therefore deficient in In-Built storage by this **1.5m²**. This deficiency is unacceptable for the future occupants of **Unit 7** which should be provided with a **minimum** of **2m²** In-Built Storage capacity. Again, the Supplementary Planning Guidance suggests a **5%** increase above the Table 3.1 minimum should be considered. Thus, not meeting the **minimum** requirement is **unacceptable**.

3.3 Communal Open Space for Block A

3.3.1 The Adopted Croydon Local Plan (2018) has no policy requirement for Shared Accommodation Developments - Communal Open Space Standards.

3.3.2 The Revised Croydon Local Plan (2021) Policy DM1A: Amenity standards for residential developments States:

- e. 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.

3.3.3 The London Plan Policy H16 Large-scale purpose-built shared living States:

- 6) Communal facilities and services are provided that are sufficient to meet the requirements of the intended number of residents and offer at least:
 - a) Convenient access to a communal kitchen;
 - b) Outside communal amenity space (roof terrace and/or garden).

3.3.4 For the proposal, the only realistic guidance is the Revised Croydon Local Plan Policy DM1A e) and for the 5 Unit proposal would require 50m² Communal Open Space.

3.4 Play Space for Children of Block A

3.4.1 The current adopted Croydon Plan (2018) 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 Supplementary Planning Guidance (2.16) and, although it applies to publicly funded housing development and that on GLA land, it is considered best practice. The Mayor's Supplementary Planning Guidance Providing for Children and Young People's Play and Informal Recreation also recommends a minimum benchmark of 10m² of dedicated play space per child.

3.4.2 The Revised Croydon Local Plan (2021) para 4.32H States:

- 4.32H** The GLA Population Yield Calculator should be used to calculate the expected number of children and young people likely to live in the development. The London Plan Housing Supplementary Planning should be referred to for the allocation and design guidance for play space.

3.4.3 London Plan **Policy S4 Play and informal recreation** States:

5.4.5 Formal play provision should normally be made on-site and provide at least **10 square metres per child** to address child occupancy and play space requirements generated by a development proposal.

3.5 Communal Open Space and Play Space Allocation

3.5.1 The proposal offers a total of **190m²** Communal Garden Area. The required Revised Croydon Plan requires **50m²** allocation for the **5 Units** of **Block A** and as there would probably be **8** (eight) Children accommodated in Block A requiring **80m² Play Space** this would be **130m²** within the total allocated of **190m²**.

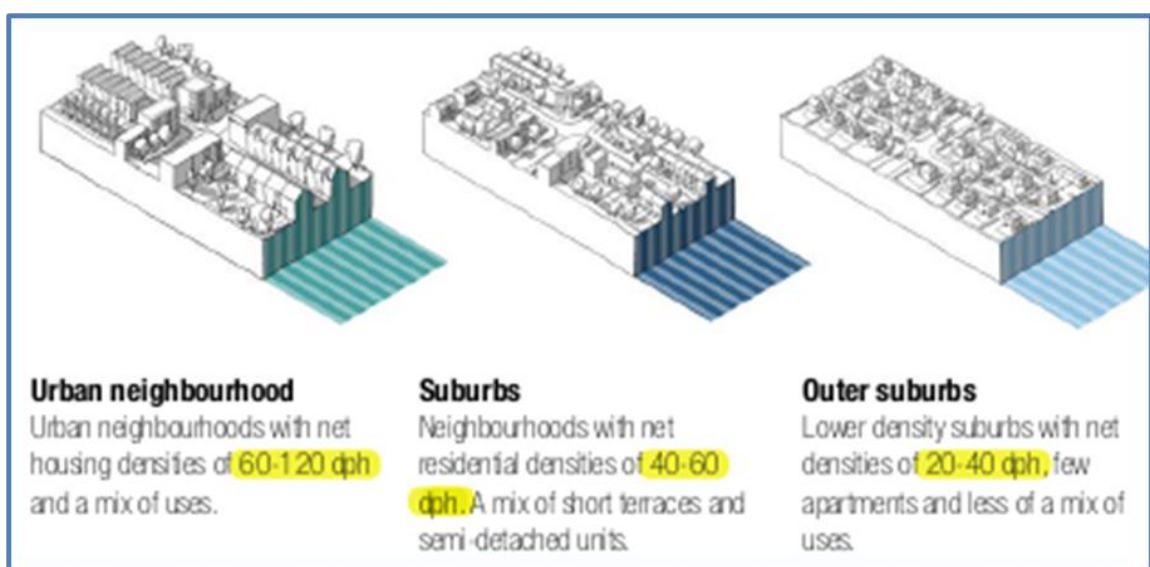
3.5.2 However, the proposal does not provide a separate segregated Play Space area for the Children or any Play equipment. These facilities should be segregated and play equipment provided.

4 Local Design Code Analysis and assessment.

4.1 The NPPF at paras 128 & 129 indicates:

128. *To provide maximum clarity about design expectations at an early stage, all local planning authorities should prepare **design guides or codes** consistent with the principles set out in the **National Design Guide and National Model Design Code**, and which reflect local character and design preferences. ...*

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.***



Extract from the National Model Design Code Part 1 – The Coding Process
2.B Coding Plan, Figure 10 – Example Area Types (Page 14)

4.2 National Model Design Code & Guidance – Area Type Settings.

4.2.1 The above illustration is an extract from the **DLUHC National Model Design Guide & Guidance Part 1 Coding Plan** illustration, 10 page 14 of the **Area Type Settings** for **Outer Suburbs, Suburbs and Urban Neighbourhoods** which gives guidance on appropriate ranges for **Housing Density in Dwellings per hectare (dph) or (Units/ha)**.

4.2.2 The Croydon Plan Policy

4.2.2.1 The **Croydon Local Plan** and the **Revised Local Plan** have **NO** guidance to evaluate and assess local **Design Codes**. The only mention of “**Design Code**” in the **Revised Croydon Plan** is at **DM38.1** & **DM38.2** relating to the **Croydon Opportunity Area** but gives NO guidance on how to assess or define the appropriate **Design Code** for this locality (The Croydon Opportunity Area), so the statement is meaningless.

4.2.3 The London Plan Policy

4.2.3.1 Policy **H2 Small sites** require **LPAs** to define **Design Codes for Small Sites** but does not define how that should be achieved.

4.2.3.2 **Policy D3 Optimising site capacity through the design-led approach** at para 3.3.2 states:

3.3.2 A design-led approach to optimising site capacity should be based on an evaluation of the site's attributes, its surrounding context, and its capacity for growth to determine the appropriate form of development for that site.

But does not provide guidance on how that should be assessed or defined.

4.3 Local Area Type Setting Design Code Densities

Location	Area (ha)	Population	Dwellings (Units)	Residential Density (bs/ha)	Housing Density (Units/ha)	"Setting" for Design Code Density	Dwellings 2.36p/u	Revised Housing Density	"Setting" for Design Code Density
Shirley North Ward	327.90	15666	6555	47.78	19.99	<Outer Suburban	6638	20.24	Outer Suburban
Shirley South Ward	387.30	14147	5919	36.53	15.28	<Outer Suburban	5994	15.48	<Outer Suburban
All Shirley	715.20	29814	12474	41.69	17.44	<Outer Suburban	12633	17.66	<Outer Suburban
MORA Area	178.26	9283	3884	52.07	21.79	Outer Suburban	3933	22.07	Outer Suburban
Post Code CR0 8S(*)	16.95	627	237	36.99	13.98	<Outer Suburban	237	13.98	<Outer Suburban
Post Code CR0 8T(*)	11.82	644	246	54.48	20.81	Outer Suburban	246	20.81	Outer Suburban
Post Code CR0 7PL	1.73	47	19	27.17	10.98	<Outer Suburban	19	10.98	<Outer Suburban
Post Code CR0 7QD	1.51	68	28	45.03	18.54	<Outer Suburban	28	18.54	<Outer Suburban
Post Code CR0 8UB	1.70	71	30	41.89	17.70	<Outer Suburban	30	17.70	<Outer Suburban
Shirley "Place" ¹ (approx)	770.00	?	?	?	?	?			
Average	205.08	8787	3670	42.72	17.35	<Outer Suburban	3723	18.15	<Outer Suburban
All Shirley	715.20	29814	12474	41.69	17.44	<Outer Suburban	12633	17.66	<Outer Suburban
Shirley Place (Estimates)	770.00	33414	13981	43.39	18.16	<Outer Suburban	14158	18.39	<Outer Suburban

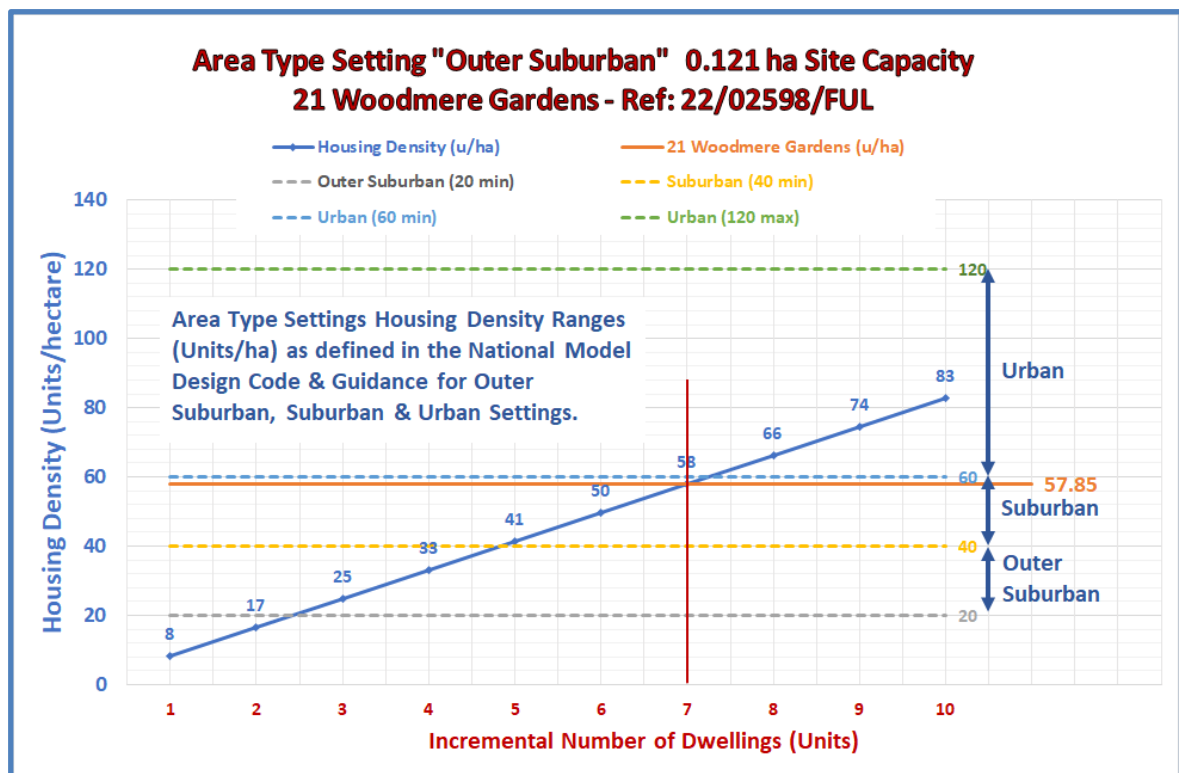
A Comprehensive Assessment of Local Area Type Settings for Shirley.

4.3.1 The assessment of **Local Design Code Area Type Settings** by all the **Shirley** parameters listed above have **conclusively** established that the locality is **≤ Outer Suburban**, based upon the **NPPF** guidance in the **National Model Design Code & Guidance** published by the Department for **Levelling Up, Housing & Communities (DLUHC)** initially in **January 2021** and updated **June 2021**. This was in adequate time for guidance to be included in the **Revised Croydon Local Plan**, but it was omitted.

4.3.2 **If the Case Officer disagrees with this guidance, we respectfully request that the Recommendation Report specifically sets out the reason for such disagreement and also indicates a methodology used to evaluate an alternative assessment procedure.**

5 Site Capacity

- 5.1 The first analysis is to establish the available “**Site Capacity**” offered by the **Site Area** available of **0.121ha** to assess the appropriateness of the proposal.
- 5.1.1 The Site Area is **0.121ha** and the **Area Design Code** as defined above is “**Outer Suburban**” and the proposal is for a Block of **5 (five) apartments** with **6 (six) parking spaces** and **190m²** of shared communal open space for the occupants of Block A and **80m²** **Play Space** for the probable number of children of occupants of Block A.
- 5.1.2 The total number of dwellings is therefore **7 (seven)** in **0.121ha** which equates to housing Density **57.85u/ha** **exceeding** the “**outer-suburban**” setting range of **20 to 40 units/ha** by **17.85** i.e. a percentage increase of $(40 - 57.85)/40 = 17.85/40 = 0.44625 = 44.625\%$.
- 5.1.3 **Site Capacity:**

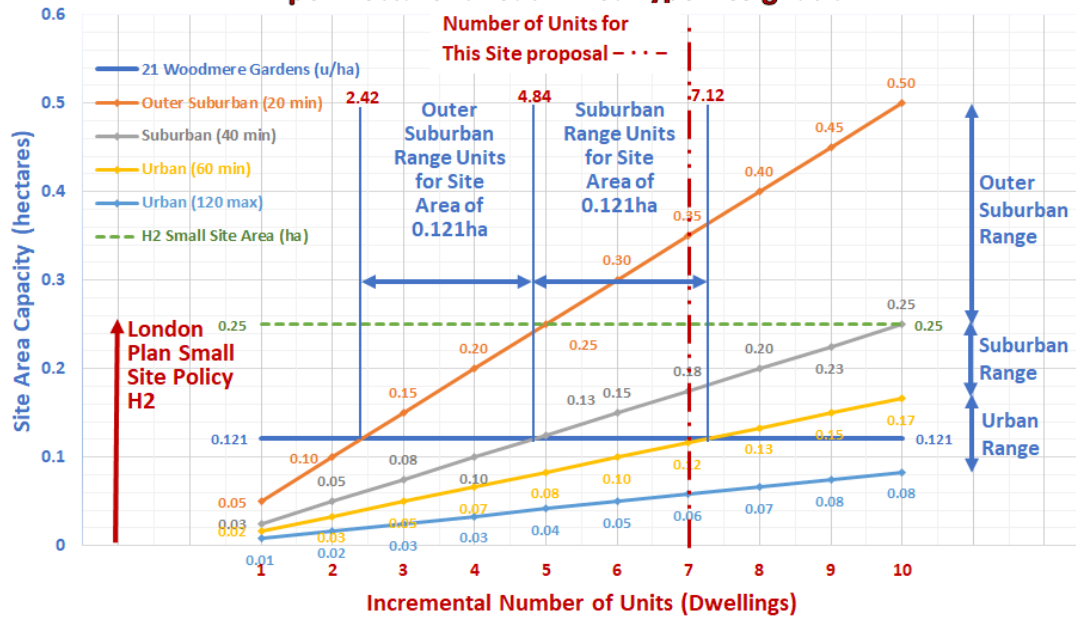


Graphical illustration of Site Capacity for 0.121ha in relation to the Area Type Setting as defined by the National Model Design Code & Guidance.

- 5.1.4 The above graphical illustrations clearly show the proposal is toward the **maximum** of the “**Suburban**” Area Type Setting which clearly significantly exceeds the **predominant local Design Code Setting** of “**Outer-Suburban**” as demonstrated in the table above.
- 5.2 **Relationship between Design Code Setting and Supporting Infrastructure**
- 5.2.1 It is considered that the **National Model Design Code Ranges** are defined to relate to the appropriateness with regard to **supporting infrastructure** and should be at the **lower** of the **Density range** for **low supporting infrastructure** and **toward the higher** of the **Density range** for **higher supporting infrastructure**. This site has the **lowest possible Accessibility to Public Transport (PTAL Zero)** and therefore should be at the **lower of the “Outer Suburban” Area Type Setting Density** than offered.

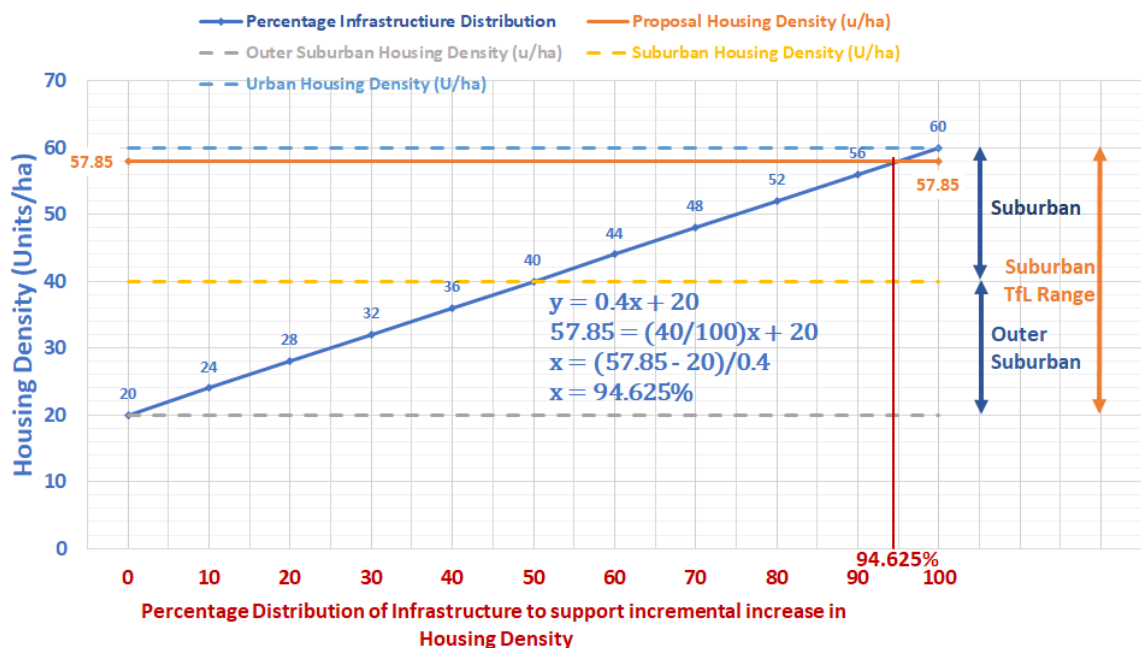


National Model Design Code Site Capacities - Number of Dwellings per Hectare for each Area Type Designation.



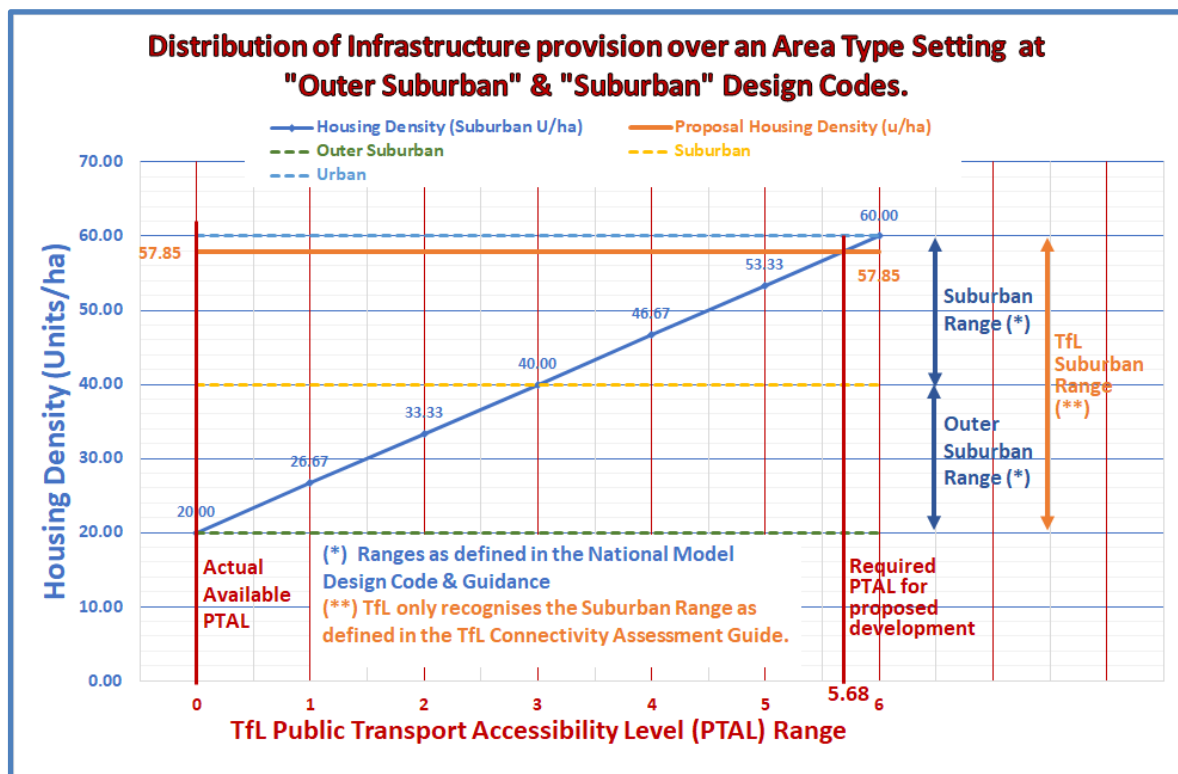
Graphical illustration of ranges of number of dwellings appropriate within the "Outer-Suburban" and "Suburban" Ranges for a Site Area of 0.121 hectares

Distribution of Infrastructure with Increased Housing Density across "Outer Suburban" & "Suburban" Area Type Settings



Graphical illustration of Infrastructure provision to support the proposed Housing Density in a Suburban Area Type Setting (TfL assessment) indicates a required 94.625% provision of Supporting Infrastructure Services.

- 5.2.2 The **TfL Assessment of Housing Density** does not distinguish between **Outer Suburban** and **Suburban** Area Type Settings (yet) but has one designation for **Suburban**. Therefore, assuming the **Infrastructure distribution** increases linearly across the **Density Range** for this combined "**Suburban**" Area Type **Setting**, the level of acceptable provision of **Supporting Infrastructure** required in relation to **Housing Density** can be illustrated as shown at **94.625%** above.
- 5.2.3 This illustrates that the **Housing Density** of the proposal requires '**exceptionally**' **good supporting infrastructure** in terms of utility provision and public, Schools, GP Surgeries, etc. and other support services including accessibility to public transport facilities.
- 5.2.4 The only parameter available for assessment of supporting infrastructure is the **TfL Public Transport Accessibility Level (PTAL)** as defined in the **TfL Connectivity Assessment Guide²**. The TfL range of **PTAL** available is from **PTAL 0 (Zero)** through to **PTAL 6+ (6b)**. The values of 1a & 1b and 6a & 6b are indeterminate from a numerical assessment and so the full range is assumed **0** through to **6**.



Graphical Analysis of required distribution of Public Transport Accessibility at the National Model Design Codes Settings for Housing Density and the TfL equivalent assessment would require PTAL of 5.68 when the available PTAL is Zero.

- 5.2.5 Therefore, a further method of **assessment of infrastructure requirement** is to assume the provision of **Public Transport Accessibility** as linearly incremental over the range from 0 through to 6. The Housing Density should be at the **lower** of the **Area Type Setting** range for **Low PTAL** and **toward the higher** of the range of **Housing Density** for higher

² <https://content.tfl.gov.uk/connectivity-assessment-guide.pdf>

PTAL. If this incremental increase is considered linear over the range 0 to 6 for an area type setting we can assess the appropriate incremental increase in required **PTAL** as an improved infrastructure capacity over the **National Model Design Code & Guidance** Ranges from minimum to maximum in the **Design Code Ranges** as shown below.

5.2.6 Assuming the possible range of PTAL for the TfL Suburban Designated Area Type Setting is linear over the National Model Design Guide Range for Outer Suburban and Suburban Area Type Settings, then the **TfL PTAL** should follow the above **Suburban** graphical distribution over the **Housing Density range 20u/ha to 60u/ha**.

5.2.7 The available **PTAL at 21 Woodmere Gardens is Zero** and the required **PTAL at 57.85units/hectare** would be **a PTAL of 5.68**.

This is calculated from the function $y = mx + c$

where y = Housing Density (U/ha) ; $m = \delta y / \delta x$; x = PTAL and $c = y$ when $x = 0$

$\therefore 57.85 = ((60 - 20)/6)x + 20 \therefore x = 5.68 = \text{PTAL}$

5.2.8 **If the Case Officer disputes this methodology of assessment, we would respectfully request and appreciate a professional alternative methodology of assessment for defining the appropriate level of 'supporting infrastructure' rather than a vague subjective statement of acceptability without any logical supporting detailed assessment or analysis.**

5.2.9 The foregoing assessment is conclusive evidence that the **Housing Density** of the proposed development would require an **"excellent"** level of supporting infrastructure for the Area Type as assessed by both the **National Model Design Code & Guidance** and the **TfL connectivity Assessment** when the actual supporting infrastructure is **"extremely poor"** by comparison.

6 Growth, Densification & Intensification.

6.1 Croydon Local Plan (2018) 'Growth' Policies

6.1.1 The **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'** 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**.

6.1.2 The current **Croydon Plan** and **Revised Croydon Plan (2018)** 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.

6.2 The Revised Croydon Local Plan at Policy **SP1.0C** states:

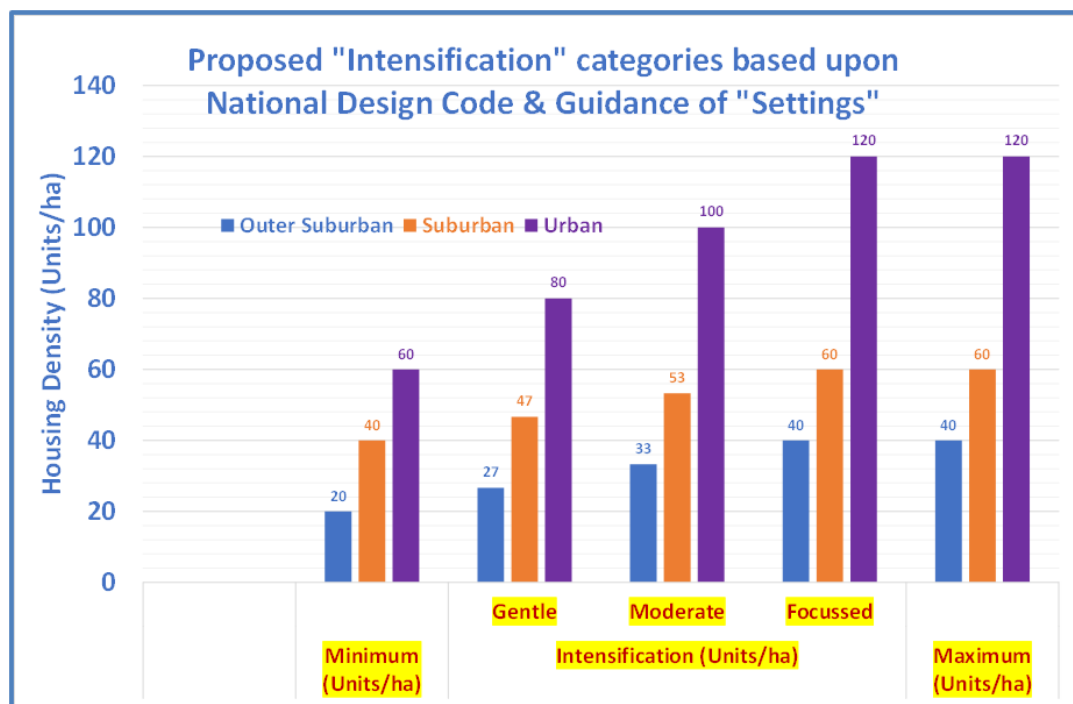
SP1.0C There are residential areas where the characteristics and infrastructure provision have led to the identification of potential for sustainable housing growth and renewal.

- 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.
- Moderate Intensification** – are areas where density will be increased, whilst respecting existing character, in locations where access to local transport and services is good.
- Evolution and **gentle densification** will be supported across all other residential areas.

6.2.1 **21 Woodmere Gardens** is not categorised as appropriate for **“Focussed”** or **“Moderate”** densification. It is therefore appropriate for evolution by **“Gentle” densification**. However, the **Revised Croydon Local Plan** fails to *define* exactly what is meant by **“Gentle” densification**. **Therefore the ambiguous subjective term “Gentle Intensification” is meaningless.**

6.3 Assessment for evolution

6.3.1 As the **National Model Design Code** Area Types currently rely on the **available supporting infrastructure**, unless there are programs of improved infrastructure over the life of the plan, any intensification within an **Area Type or Setting** relies on that **existing Supporting infrastructure** and therefore the **Design Code Density** should **remain within** the **Setting** or **Area Type “Ranges”** as defined.



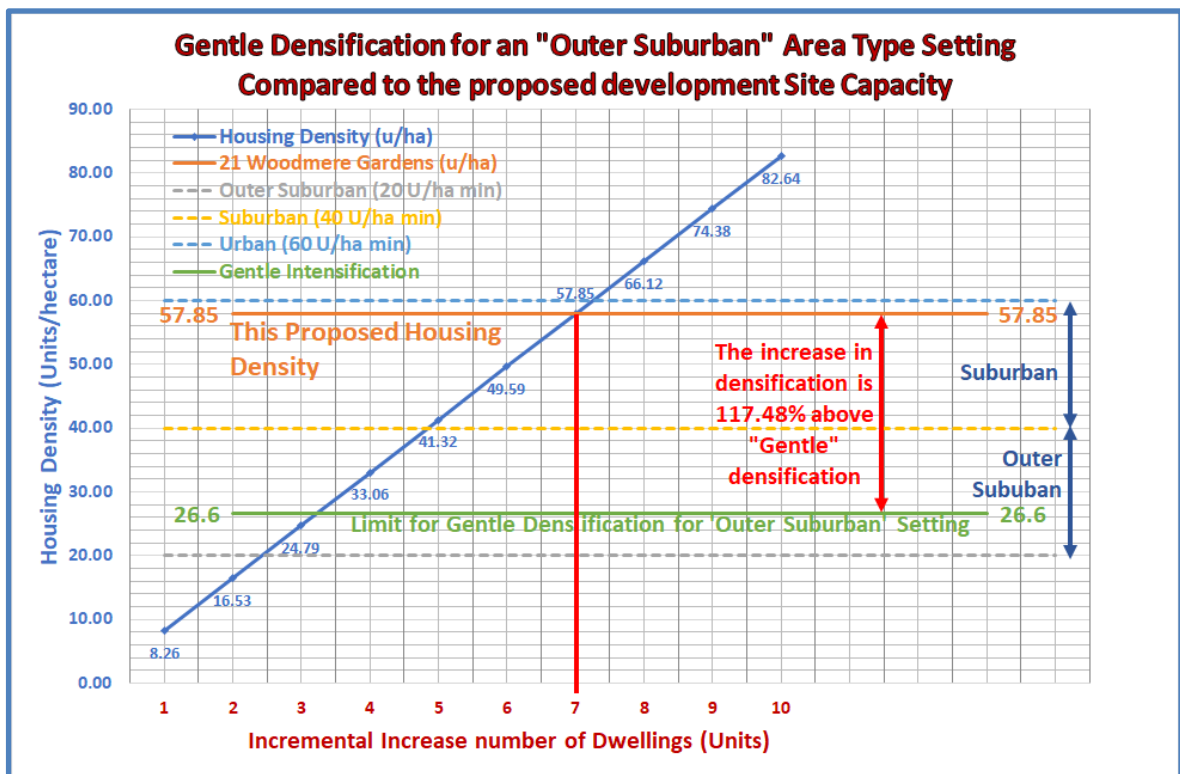
Suggested ranges for Gentle Moderate and Focussed intensification to remain within infrastructure limitations of the Setting and Area Type

6.3.2 It should be clearly recognised that **Shirley** has NO prospect of **infrastructure or Public Transport improvement** over the life of the plan as stated in the **LB of Croydon Infrastructure Delivery Plan³**. 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 fundamental principles as follows:

³ <https://www.croydon.gov.uk/sites/default/files/2022-01/infrastructure-delivery-plan-2021.pdf>

6.3.3 Incremental ***“Intensification”*** Ranges:”

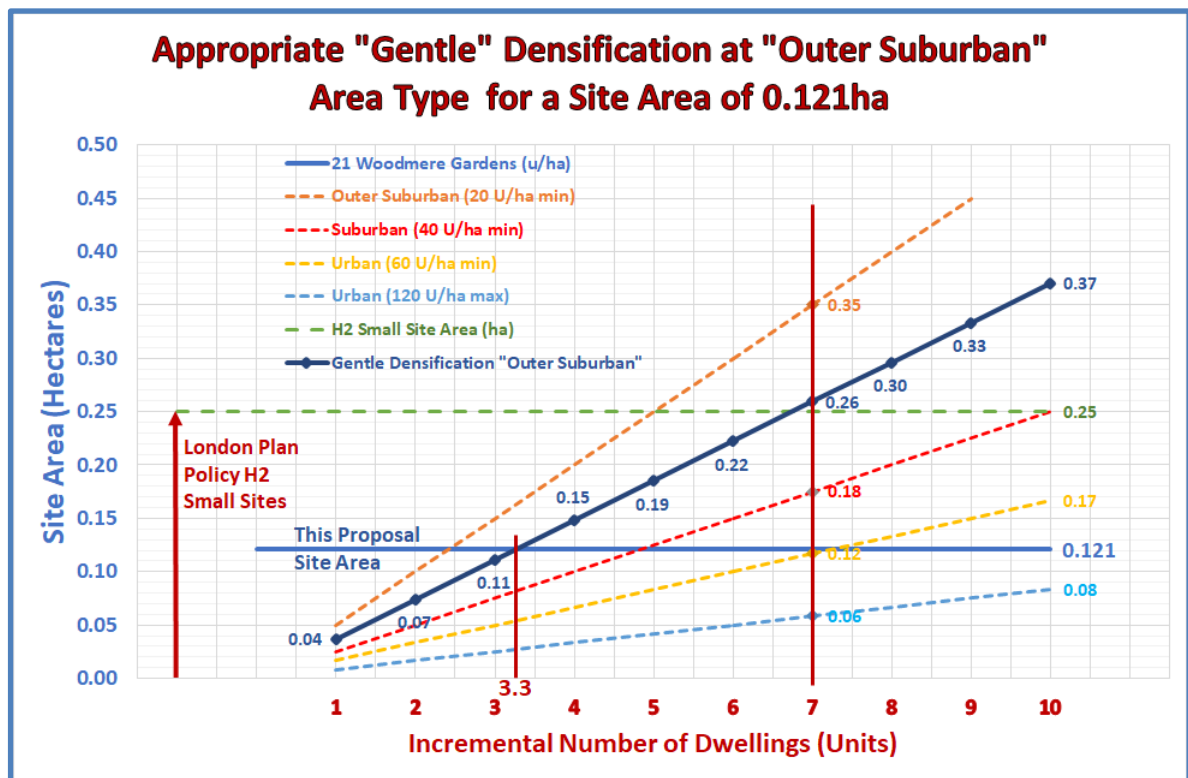
6.3.4 We have shown an **incremental** increase in **Design Code Density** of $\frac{1}{3}$ & $\frac{2}{3}$ between Settings for **“Outer Suburban”**, **“Suburban”** and **“Urban”** for **“Gentle”**, **“Moderate”** and **“Focussed”** Intensification or **densification** as an example. There is **NO** 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 Space Standards** as defined in the London Plan Table 3.1. This is our interpretation of the Local Plan Policy as there is no **‘meaningful’ guidance** in the **Croydon Revised Local Plan** or the **London Plan**.



Based upon an appropriate level for “Gentle” densification as suggested above, the actual proposal is 114.26% above the recommendation.

6.3.5 Thus for **21 Woodmere Gardens**, with a **Site Capacity** limitation of **0.121ha** the **“Gentle” Densification** should **NOT** exceed a **Housing Density** ≈ 27 Units/ha (i.e., $(20 + (40 - 20)/3) = 26.6$ but it actually reaches **57.85U/ha** which is $(57.85 - 26.6)/26.6 \approx 117.48\%$ increase above the **“Gentle” densification** appropriate for the locality. This level of **densification** is **NOT** supported by the **local infrastructure** and there is no planned increase in infrastructure provision for the **Shirley North Ward** over the life of the plan.

6.3.6 There is **NO definition** of any assessment limiting parameters for **“Incremental Intensification”** in the Adopted **London Plan** or the adopted or Revised **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 Local Plan.



Graphical illustration of limit of "Gentle" Densification for Site Area 0.121ha in an "Outer Suburban" Area Type Setting limits the units to 3 maximum.

6.3.7 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 Local Plan. However, the foregoing analysis and assessment suggests that the Site Area Capacity for 21 Woodmere Gardens of **0.121hectares** can only accommodate **3 Units** as the Area Type Setting is **"Outer Suburban"**. The Site Area required to accommodate **7 Units** would need to be **0.26hectares** which includes an allowance for **"Gentle" densification**.

6.3.8 In summary these designations are *'meaningless,' in fact, there is NO meaningful definition of "Growth" Management Policy, a fundamental requirement of the job description and "Mission Statement" for the Croydon LPA Development Management Department. If the Case Officer disagrees with the above assessment and analysis for "Gentle" Densification, we respectfully request that the Case Officer's Report provide an explanation of the professional assessment of "Gentle" Densification with supporting evidence and explanation.*

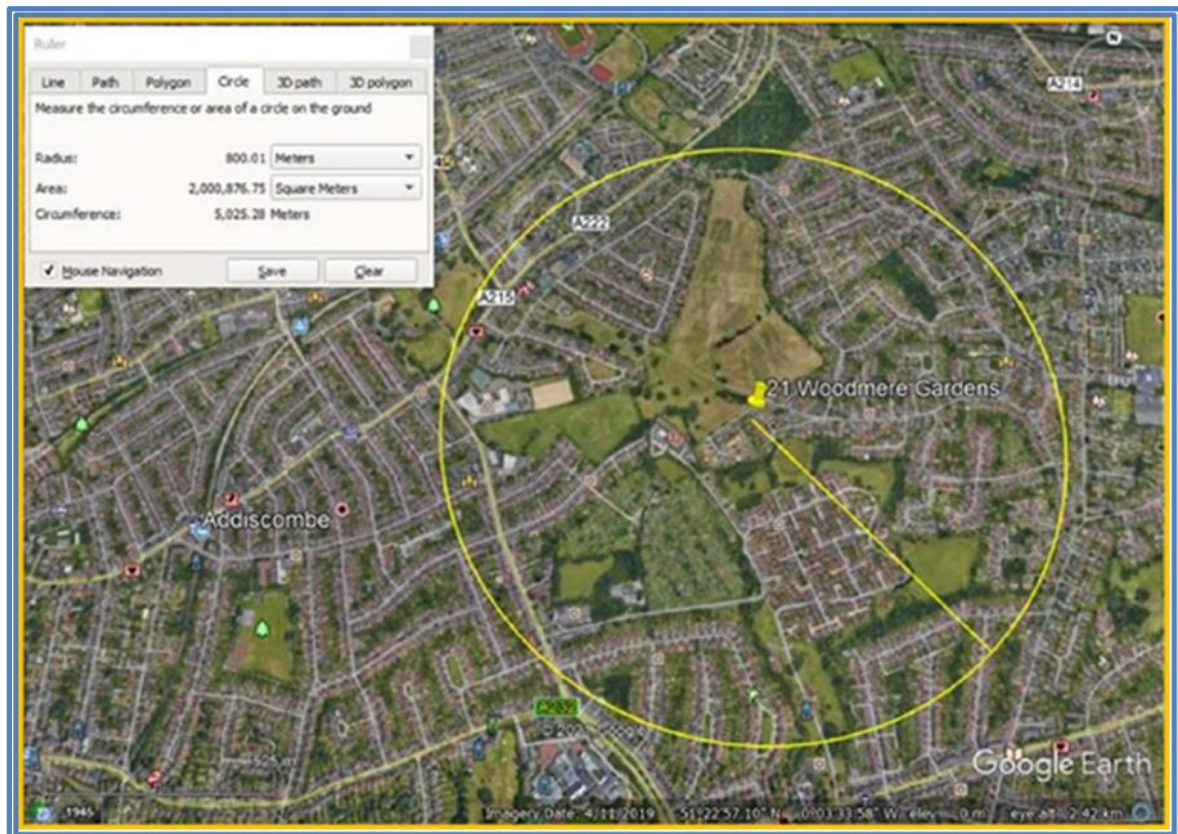
6.4 London Plan "Incremental Intensification".

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

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

As 21 Woodmere Gardens has PTAL 0 (Zero) and is greater than 800m from either Tram/Train Stations or a District Centre it is inappropriate for "Incremental Intensification."

- 6.4.2 The Google Earth Image below illustrates that 21 Woodmere Gardens is greater than **800m** from any **Tam or Train Station**. **21 Woodmere Gardens** is also greater than **800m** from the **Shirley Local Centre**. However, the requirement is to be greater than **800m** from a “**District Centre**” and the **Shirley Local Centre** is **NOT** a **District Centre**. Therefore, the location of **21 Woodmere Gardens** is inappropriate for “**Incremental Intensification**” as defined by the **London Plan Para 4.2.4**.



Google Earth Image showing Location of 21 Woodmere Gardens exceeding 800m from any Tram/Train Station and exceeding 800m from the nearest District Centre

7 Parking

7.1 Residential Parking

- 7.1.1 The **Croydon Local Plan** (Revised December 2021) Residential Parking Policy at **Table 10.1** states:

For PTAL 0, 1a & 1b for All Homes in an Area with no controlled Parking Zones for 1 & 2-bedroom Units allocation is 1 space per Unit and 1.5 Spaces for 3 or more Bedroom Units.

Therefore, the proposal would require **8** spaces to support the development which equates to the offered 8 Spaces.

- 7.1.2 The **London Plan (March 2021)** Residential Parking for Outer London Boroughs at **Table 10.3** states:

For Outer London at PTAL 0 to 1 For 1 – 2 Bedrooms allocated Up to 1.5 space per Unit and Similar for 3 and greater bedrooms up to 1.5 spaces per unit.

- 7.1.3 However, The London Plan is *more reasonable* in respecting **lower PTAL provision** for **Outer London Boroughs** and would require **10.5 (=11 rounded integer as it is not possible to have half a car)** spaces to support the development when only **8 Spaces** are provided, which would require **3 on-street overspill spaces**.
- 7.1.4 The proposal offers just **8 parking bays** which is a deficiency of $(10.5-8)/10.5 = 23.8\%$ deficient in **parking provision** as defined requirement for the **London Plan** Residential Parking allocation for **Outer London Suburbs** at **PTAL Zero**.

New Dwellings	Car Parking Space (Offered)	Bedrooms	Bed-Spaces (Persons)	Parking Croydon Local Plan Table 10.1 (PTAL 0)	Parking London Plan Table 10.3 (PTAL 0)
Apartment Unit 1 (M4(3))	1	2	4	1	1.5
Apartment Unit 2 (M4(2))	1	1	2	1	1.5
Apartment Unit 3 (M4(2))	1	3	4	1.5	1.5
Apartment Unit 4 (M4(2))	1	3	4	1.5	1.5
Apartment Unit 5 (M4(2))	1	2	4	1	1.5
Disabled Bay	1	0	0	0	0
Semi-detached Unit 6	1	2	4	1	1.5
Semi-detached Unit 7	1	2	4	1	1.5
Total	8	15	26	8	10.5

London Plan & Croydon Plan Residential Parking at PTAL Zero

- 7.1.5 Therefore, the Parking provision offered for **21 Woodmere Gardens** at an **Outer Suburban Area Type Setting** and with **PTAL Zero** is inadequate and inappropriate.

8 Sustainability and Housing Need

8.1 NPPF Para 7 States:

- 8.1.1 *"The purpose of the planning system is to contribute to the achievement of **sustainable** development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own **needs**⁴... "*

- 8.1.2 For **Sustainability**, developments require adequate **supporting infrastructure** but there is **NO planned improvement** in the provision or delivery of new or improvements to the existing Infrastructure⁵ for **Shirley** over the life of the Plan.

8.2 Housing Need

- 8.2.1 The allocation of housing **"need"** assessed for the **"Shirley Place" [770ha]** over the period **2019 to 2039** is **278** (See Croydon Revised Local Plan⁶ 2021 **Table 3.1**). This equates to **≈14 dwellings per year**.

⁴ Resolution 42/187 of the United Nations General Assembly

⁵ <https://www.croydon.gov.uk/sites/default/files/2022-01/infrastructure-delivery-plan-2021.pdf>

⁶ <https://www.croydon.gov.uk/sites/default/files/2022-01/croydon-local-plan-2018-revised-2021-part-1-start-to-section-11.pdf>

8.2.2 In relation to meeting housing **“need”** we raised a Freedom of Information (FOI) request **Ref: 4250621** on **31st January 2022**. The FOI Requested data on the **Outturn** of Developments since **2018** for the **Shirley “Place”** plus the **Area, Housing and Occupancy** of the **Shirley Place** for which the response is as follows:

8.2.3 The FOI response indicated, the **Shirley “Place”** as defined in the Local Plan has an area of **approximately ≈770 ha** and comprises **Shirley North** and **Shirley South Wards** and therefore the FOI response ‘suggests’ completions for **Shirley “Place”** can be calculated by **adding** the completion figures together for each **Shirley Ward**. **This is ‘NOT True’ as described later.**

8.2.4 Analysis of this limited information (FOI response) supports our assumption that completions are recorded but **NOT** against the **“Places”** of Croydon and **no action** is taken by the LPA as a result of those completions. In addition, the **“Shirley Place” Area does NOT equate to the sum of the Shirley North & South Ward Areas.**

8.2.5 The FOI Response indicates:

- *The Council does not hold the information we requested in a reportable format.*
- *The Council does not know the **exact Area** in hectares of any “Place”*
- *The Council does not hold the **Number of Dwellings per “Place.”***
- *The Council does not hold the **Number of Persons per “Place”***

Shirley North				
	2018	2019	2020	2021 (partial)
Gross units	48	94	73	16
Net units	45	87	69	12
Shirley South				
	2018	2019	2020	2021 (partial)
Gross units	12	17	3	5
Net units	10	15	0	5
Shirley Place				
	2018	2019	2020	2021 (partial)
Gross units	60	111	76	21
Net units	55	102	69	17

8.2.6 Analysis of the recorded data shows over the **‘three’ full years 2018 to end of 2020**, the **Net Increase in Dwellings** for Shirley = Shirley North Ward + Shirley South Ward = **55 + 102 + 69 = 226 ≈ 75 per yr.** (However, this is **NOT** The **Shirley “Place”** at **≈770ha** but the net increase for the **Shirley North [327.90ha] + Shirley South Wards [387.30ha]** total of **715.20ha**) a difference of **54.8ha**.

8.2.7 The **MORA Area** of **178.20ha** (which we monitor) is only **24.92%** of **All Shirley (715.2ha)**, but at a rate of **36dpa** over the **20yr** period **≈720 dwellings**, would exceed the **Target for the Shirley “Place”** of **278** by **442 Dwellings** **for the Whole of the Shirley “Place”** (≈770ha FOI response).

TARGET OUTTURNS (Estimates)							
Locality	Area (ha)	Dwellings	Population	Percentage of ALL Shirley	Units over 20 yrs (Estimate)	Per Year (Target Outturn)	Actual (Outturn/yr)
Shirley North Ward	327.90	6555	15666	45.85%	127	6	67
Shirley South Ward	387.30	5919	14147	54.15%	151	8	8
All Shirley	715.20	12474	29814	100.00%	258	13	75
Shirley "Place" (Approximately)	770.00	?	?	107.66%	278	14	?
MORA AREA	178.26	3884	9283	24.92%	69	3	36

Estimated Target Outturns for Shirley and the MORA Area of 178ha (24.92%) portion of All Shirley Ward Wards of 715.20ha

- 8.2.8 This is $(720-278)/278 = 158.99\%$ Increase for the Shirley "Place" when the MORA Area is only $(770-178.2)/178.2 = 23.15\%$ of the area of the estimated Shirley 'Place' and $(178.26-715.2/715.2) = 24.92\%$ of all Shirley. **This is definitely NOT respecting the character of the locality when the locality of this proposal is "Inappropriate for Incremental Intensification" with a PTAL of Zero and there is no probability for increase in supporting infrastructure.**
- 8.2.9 The Build rate delivery of dwellings for all Shirley is averaging at $55 + 102 + 69 = 226 \approx 75.33$ dwellings per year, so over 20 years the Net Increase will be ≈ 1507 dwellings. (Exceeding the 278 Target by $\approx 1,229$). The Target for the Shirley "Place" at Table 3.1 of the Revised Croydon Local Plan indicates a Target of 278 dwellings over the period 2019 to 2039.
- 8.2.10 This would exceed the Target over 20 yrs. (of 278) by: $(1507 - 278)/278 = 442.1\%$. From the FOI Request, the Area of the Shirley "Place" is ≈ 770 ha. The total Area of Shirley North & South Wards is 715.2ha (GLA figures) therefore, there is ≈ 54.8 ha excess of land in other adjacent Wards which numerically means the Target for Shirley Wards of 278 should be reduced by $7.12\% = 258$ (and the difference of 20 added to the Targets of the relevant adjacent Wards).
- 8.2.11 We are confident that this analysis completely refutes any suggestion that "Housing Need" is a reason for approval in this locality as the assessed 'Housing Need' for this area has already been satisfied.
- 8.2.12 All Development proposals should be judged on compliance to adopted Planning Policies and NOT on the basis of meeting Targets to support a Housing "need" especially so if that "need" has already been met.

9 Summary and Conclusions

9.1 The Planning Process

- 9.1.1 Local Residents have "lost confidence in the Planning Process" with the significant recent local over-developments which, in the majority of cases, disregard Planning Policies. Once that confidence is lost, it is extremely difficult to regain it. Confidence and support of local residents is necessary to ensure the general requirement of housing need is satisfied with the provision of appropriate sustainable developments. This can only be achieved by ensuring developments comply with the agreed National and Local Planning Policies and Guidance.

9.2 General Observations

9.2.1 The Built-In Storage capacity for Apartments 3 & 4 and the Semi-Detached Unit 7 are unacceptable.

9.2.2 The Play Space for Children should be provided with Ply Activity equipment and furniture and be segregated from the Communal Open Space.

9.3 Growth Policies

9.3.1 The **Growth Policies** as specified in the **Revised Croydon Local Plan** are fundamentally flawed as they do NOT define the magnitude of “**Growth**” in their definitions. There is **NO** actual mechanistic difference between the different categories of ‘**Intensification**’ or ‘**densification**’ it is, therefore, **NOT feasible or possible to enforce such abstract subjective Policies**.

9.3.2 In the absence of any sensible **Design Code guidance** in either the **London Plan (2021)** or the **Croydon Local Current adopted or emerging Revised Local Plan**, the **NPPF para 129** specifically states that the **National Model Design Code & Guidance** should be used to provide the quantitative requirements to define Local Area Type Settings.

9.3.3 We have assessed the Local Area by various proportions and all assessment have shown the Area Type to be less than or equal to an “Outer-Suburban” Area Type Setting.

9.3.4 We have proposed a sensible assessment of an appropriate “**Gentle**” **densification** which would meet the requirement of general **evolution** in areas inappropriate for “**Intensification**”. However, the proposed development **significantly exceeds** the **Site Area of 0.121ha capacity** for “**Gentle**” **densification** of **Housing Density** for the location of **21 Woodmere Gardens** in an “**Outer-Suburban**” Area Type Setting at **Zero PTAL** by a factor of **114.26%**.

9.3.5 **If the Case Officer disagrees with any of the foregoing assessment analysis or guidance, we respectfully request that the Case Officers Recommendation Report specifically sets out the reason for such disagreement and also indicate a methodology to evaluate an alternative procedure to establish a viable assessment.**

9.3.6 The location would require a **significant improvement** in supporting infrastructure (assessed as a **94.6%** increase) and an improved **TfL PTAL** from **Zero to 5.68**, in order to support the **Density** of the proposed development. There are other additional infrastructure physical utility service constraints indicated in the LPA assessment, including **Flood Risk at 30yr and 100yr** for **Surface Water** and **Gas Pipes Low Pressures**.

9.4 Housing Need

9.4.1 At the current approval and development rate of local developments in the Shirley Wards at **36dpa** over the **20yr** period **≈720 dwellings**, would exceed the **Target for the Shirley “Place”** of **278** by **442 Dwellings** **for the Whole of the Shirley “Place”** (≈770ha FOI response).



9.4.2 The **MORA Area** of **178.20ha** (which we monitor) is only **24.92%** of **All Shirley (715.2ha)**, but at a rate of **36dpa** over the **20yr** period **≈720 dwellings**, would exceed the **Target for the Shirley "Place" of 278 by 442 Dwellings for the Whole of the Shirley "Place" (≈770ha FOI response)**.

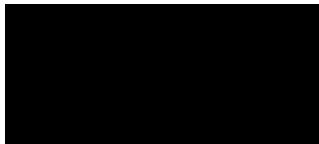
9.2.8 We have conclusive evidence by **FOI request**, that the **Housing "Need"** identified in the **Shirley Wards** have exceeded the yearly **Targets** for the **"Shirley Place"** confirming the Housing **"Need"** in this locality **has been met and has been satisfied**.

9.5 Conclusion

9.5.1 We therefore urge the Case Officer to refuse planning permission for the proposal **Ref: 22/02598/FUL** such that the Applicant can reapply with a more appropriate and compliant proposal.

9.5.2 *If permission is Granted for this proposal, it would be absurd to believe that the Planning Policies have any meaningful weight and local residents would be quite correct in their current complete loss of confidence in the Planning Process.*

Kind Regards



Derek C. Ritson I. Eng. M.I.E.T.
Monks Orchard Residents' Association
Executive Committee – Planning
Email: planning@mo-ra.co



Sony Nair
Chairman MORA
Monks Orchard Residents' Association.
Email: chairman@mo-ra.co

Cc:

Sarah Jones MP
Nicola Townsend
Cllr. Sue Bennett
Cllr. Richard Chatterjee
Cllr. Mark Johnson

Bcc:

MORA Executive Committee
Local Affected Residents'
Interested Parties

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