

To: Mr Christopher Grace Case Officer
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**Monks Orchard Residents'
Association
Planning**

26th September 2022

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Reference: 22/03145/FUL
Application Received: Tue 26 Jul 2022
Application Validated: Fri 2 Sep 2022
Address: 211 Wickham Road Croydon CR0 8TG
Proposal: Demolition of existing structures to the rear of 211 Wickham Road and erection of a two-storey building containing four dwellings (1 x 3 bed and 3 x 1 bed flats) with associated parking and refuse storage.
Status: Awaiting decision
Consultation Expiry: Wed 28 Sep 2022
Determination Deadline: Fri 28 Oct 2022

Dear Mr Grace

It is understood that Planning Policy given in Supplementary Planning Document SPD2 has been revoked and therefore cannot be used for assessing development proposals.

We therefore assess this proposed development against the NPPF, The **National Model Design Code & Guidance** (2021), The **London Plan** (2021) and the adopted **Croydon Local Plan** (2018) with guidance from the emerging **Revised Croydon Local Plan** (2021). **Ref: 1**

Proposal Parameters:

211 Wickham Road				Ref: 22/03145/FUL				Post Code CR0 8TG			
Units	4			Residential Density	216.05	bs/ha		Floor Area Ratio (FAR)	0.62		
Site Area	324	sq.m.		Residential Density	262.35	hr/ha		Building Footprint	135.10	sq.m.	
Site Area	0.03	ha		Housing Density	123.46	u/ha		Plot Area Ratio	0.42		
	Floor	Bedrooms (b)	Bed Spaces (bs)	Habitable Rooms (hr)	GIA Provided (D&A)	GIA Required (Table 3.1)	Built-In Storage Provided	Built-In Storage Required (Table 3.1)	Private Amenity Space Provided	Private Amenity Space Required	Car Parking
Flat 1	Ground	3	4	4.0	74.3	74	3.4	2.5	37.2	7.0	3
Flat 2	First	1	1	1.5	44.2	39	1.4	1.0	15.4	5.0	
Flat 3	Ground	1	1	1.5	37.0	37	1.6	1.0	10.0	5.0	
Flat 4	First	1	1	1.5	44.2	39	1.4	1.0	15.4	5.0	
Total		6	7	8.5	199.7	189.0	7.8	5.5	78.0	22	3
(*) Flat 1 Built-In Storage 1.6sq.m. Under Stairs would have height limitations.											
PTAL	2	2011		Site Area	As stated on Proposed Block Plan Drawing No. 02/C						
PTAL	2	2031									

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

1 Constraints

Name: Settings of **Shirley Local Centre** and **Shirley Road Neighbourhood Centre**

Area of **Focussed Intensification**

(Note: the emerging **Ref: 2 Para 48 Revised Croydon Plan** removes this designation from the **Shirley Local Centre**)

Area: 3272296 Flood Risk 1000yr Surface Water

Diameter: 12 Gas Pipes Low Pressure

Diameter: 125 Gas Pipes Low Pressure

Local Centre: **Shirley Local Centres**

2 Initial Observations

2.1 Building Line Set-Back

- 2.1.1 The proposed development is a continuation of **Ridgemount Avenue** which has a **Building Line** following the curve of **Ridgemount Avenue Set-Back of ≈7metres**. The Corner side return **Set-Back** at **Wickham Road** is approx. **2.6metres** but this set-back only applies to Buildings fronting **Wickham Road**. Therefore, the proposal **does not follow** the established **Building Line Set-Back** of **Ridgemount Avenue**.



Existing established Building Line of Ridgemount Avenue projected over proposed development site.

2.2 Croydon Local Plan (2018) & Revised Draft Croydon Local Plan.

- 2.2.1 The current adopted **Croydon Local Plan** has no guidance on the appropriate **Building Line Set-Back**. Similarly, the **Revised Croydon Local Plan** has no guidance on the appropriate **Set-Back** or **Building Line** of proposed developments.

Ref: 2

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf

2.3 London Plan

2.3.1 There is no mention of **Set-Back** or **Building Line** requirement in the **London Plan** (March 2021).

2.4 National Planning Policy Framework (NPPF)

2.4.1 The **NPPF** also has no guidance on the appropriate **Set-back** or **Building lines** of development proposals. However, **NPPF para 128 & 129** references out to the **National Model Design Codes & Guidance**.

2.5 National Model Design Codes & Guidance.

2.5.1 **National Model Design Code & Guidance Part 1 – The Coding Process for Area Types – Built Form** vii “Building Line” page 21 does provide guidance in relation to **Area Type Settings** and the appropriate **Building Line Set-Back** at various **Area Types** and settings.

***vii Building line:** “The building line is created by the primary front face of buildings along a street and is a **key element of design codes**. **New development should follow the established building line where it exists**. Where there is no building line (for example on the periphery of a town centre or a development site), **codes should set one**. Coding for building lines can include:*

- *Variation: The extent to which buildings can be set forward or back from the line.*
- *Projections: Allowance for elements such as balconies.*
- *Compliance: The percentage of the building line that should be occupied by development.*
- *Set-Back: The distance that buildings are set back from the pavement.”*

2.5.2 Thus, the **National Planning Framework (NPPF) Policy Guidance** is available in the **National Model Design Code & Guidance** published by the **Department for Levelling Up Communities and Housing (DLUCH)** in January 2021 and updated in June 2021 and thus is **relevant guidance for this proposal** and gives a fundamental reason for a refusal.

3 Shirley Local Centre Assessment

3.1 Croydon Local Plan (2018)

3.1.1 **DM10.11** In the locations described in Table 6.3 and shown on the Policies Map as areas of focussed intensification, new development may be significantly larger than existing and should;

- a. Be up to double the predominant height of buildings in the area
- b. Take the form of character types “Medium-rise block with associated grounds”, “Large buildings with spacing”, or “Large buildings with Continuous frontage line”
- c. Assume a suburban character with spaces between buildings.

3.1.2 Developments in focussed intensification areas should contribute to an increase in density and a gradual change in character. They will be expected to enhance and sensitively respond to existing character by being of high quality and respectful of the existing place in which they would be placed.

3.1.3 It is unclear how the **“Focussed Intensification”** Policy could be applied as the policy is unspecified and undefined and does NOT take account of whether an increase in ‘intensification’ of residential density would be supported by the available **infrastructure**.

3.2 Revised Croydon Local Plan (2021)

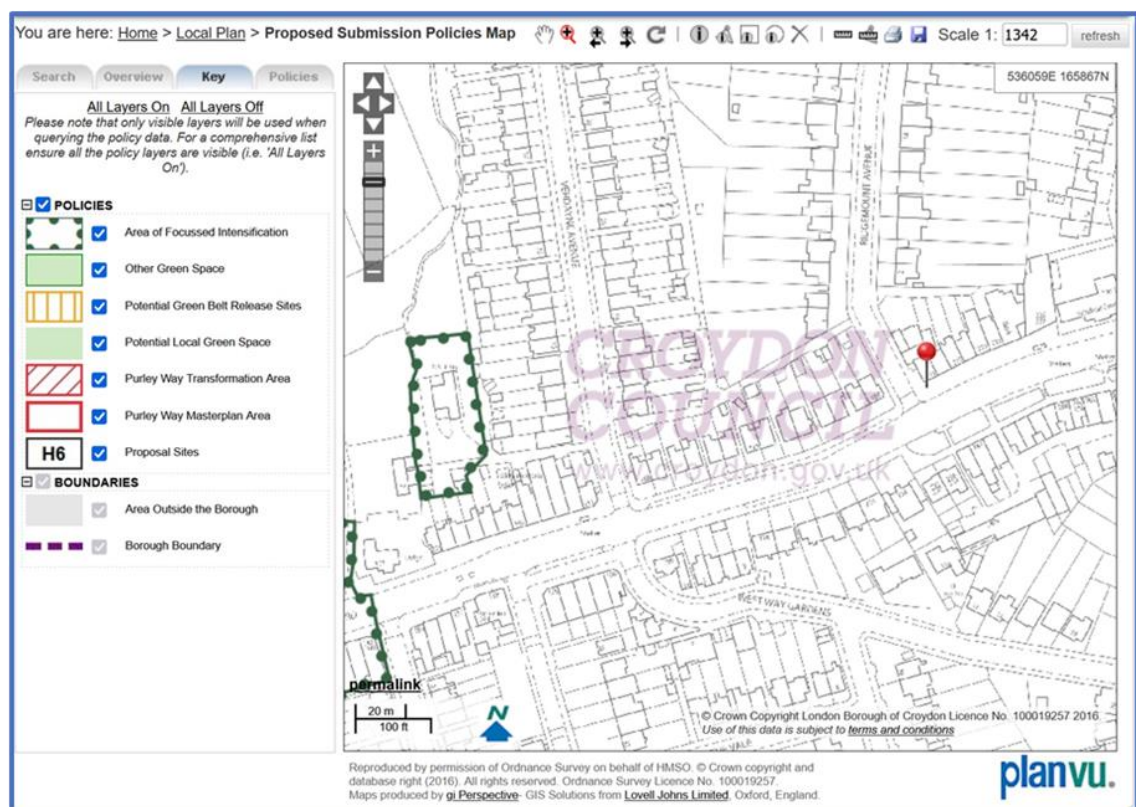
3.2.1 The emerging **Revised Croydon Local Plan** omits the “**Focussed Intensification**” at this location of the **Shirley Local Centre** due to **limited local infrastructure**, with the presumption that there would probably not be any **Infrastructure improvement** for **Shirley** over the life of the **Plan 2019 to 2039**.

3.2.2 The revised Croydon Local Plan Policy on Intensification and Densification is set out at **SP1.0C**.

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.

- 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.**

3.2.3 Revised Croydon Local Plan Policies Map.



The Revised Policies Map clearly shows that 211 Wickham Road is NOT now considered within an “Intensification” designated Area.

3.2.4 Shirley Local Centre

11.213 Shirley Local Centre consists of the combination of three different character types: an 'Urban Shopping Area', 'Scattered Houses on Large Plots' and a 'Suburban Shopping Area'. The northern side of the Local Centre is more tightly built-up, while the southern side is more spacious with green verges, tree lined streets and parking within slip roads. In this area the potential for growth is limited. The area includes a number of locally listed buildings. The setting, heights and other characteristics of these buildings should be respected.

3.2.5 Shirley Road and Wickham Road

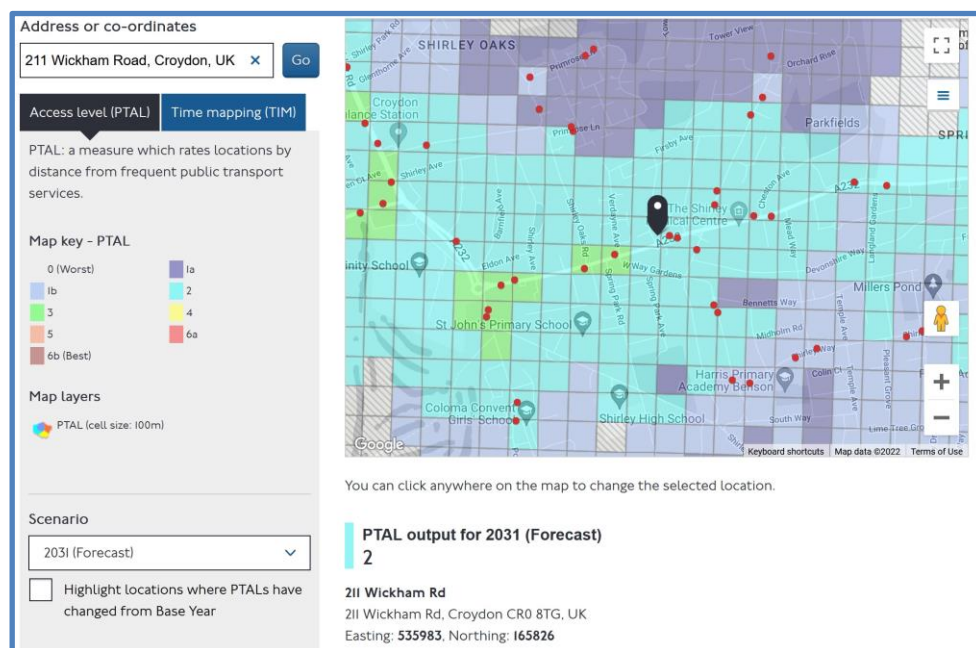
11.214 Each of Shirley's shopping areas has a distinct character which should be enhanced and strengthened. This character is informed by the layout, scale, urban grain and architectural features such as the brick-work, fascia's and stall rises. In order to ensure that the distinctive elements that contribute to Shirley's sense of place are not lost, these features have been included in the detailed policies.

3.2.6 Policy DM45: Shirley

DM45.1 Within Shirley Local Centre, to retain the unique qualities development should:

- Retain the continuity of ground floor active frontages and allow flexibility at first floor and above for mixed use;
- Reference, respect and enhance architectural features such as the consistent rhythm and articulation of fenestration and retain features such as the triangular bay windows;
- Complement the existing predominant building heights of 2 storeys up to a maximum of 4 storeys;
- Incorporate or retain traditional shop front elements such as fascia's, pilasters and stall risers; and
- Respect the setting of locally listed buildings within the area.

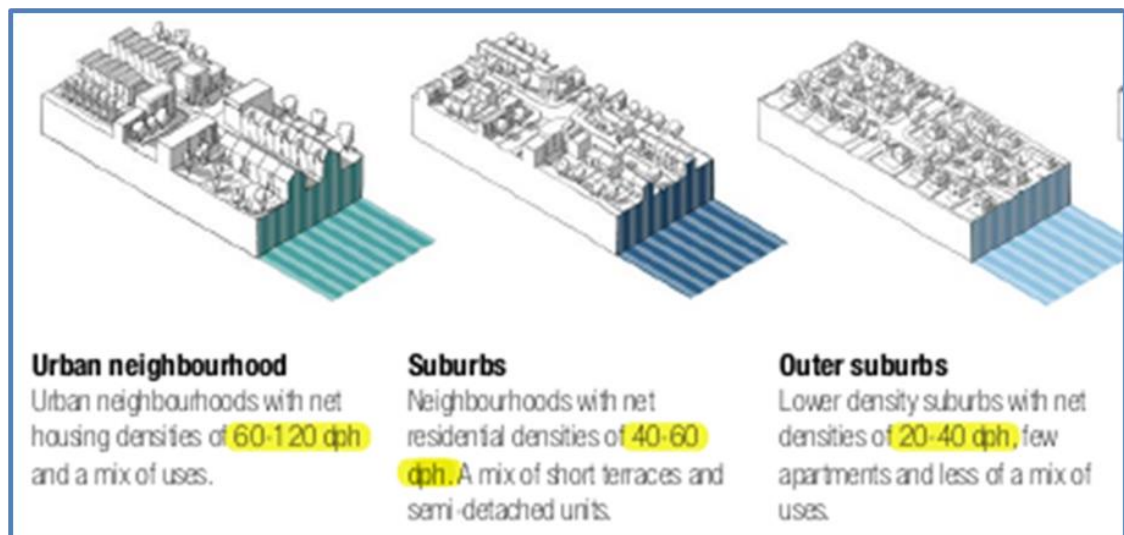
3.2.7 TfL Public Transport Accessibility Level (PTAL)



TfL Public Transport Accessibility Level (PTAL) at 211 Wickham Road.

4 Design Codes & Guidance

- 4.1 The **Croydon Local Plan (2018)** does NOT provide any guidance on the assessment of local **Design Code Assessment**.
- 4.2 The **Revised (Draft) emerging Croydon Local Plan** also does NOT provide any guidance on the assessment of **local Design Code Assessment**.
- 4.3 The **London Plan Requires at Policy D3 – Optimising Site Capacity through the Design Led Approach** recognises the need for ‘**Design Codes**’ but does NOT give any guidance or methodology how that should be achieved.
- 4.4 The **National Planning Policy Framework (NPPF)** does give guidance by referencing out to documents produced by the **Department for Levelling Up, Homes & Communities (DLUHC)** vis: **National Model Design Code and Guidance**. **Ref: 3**



Extract from the Nation Model Design Code & Guidance “Built Form” for Area Types “Outer-Suburban,” “Suburban” & “Urban” Neighbourhoods.

4.4.1 NPPF Paras 128 & 129

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. **Design guides and codes** provide a local framework for creating beautiful and distinctive places with a consistent and high-quality standard of design. Their geographic coverage, level of detail and degree of prescription should be tailored to the circumstances and scale of change in each place and should allow a suitable degree of variety.
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**

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

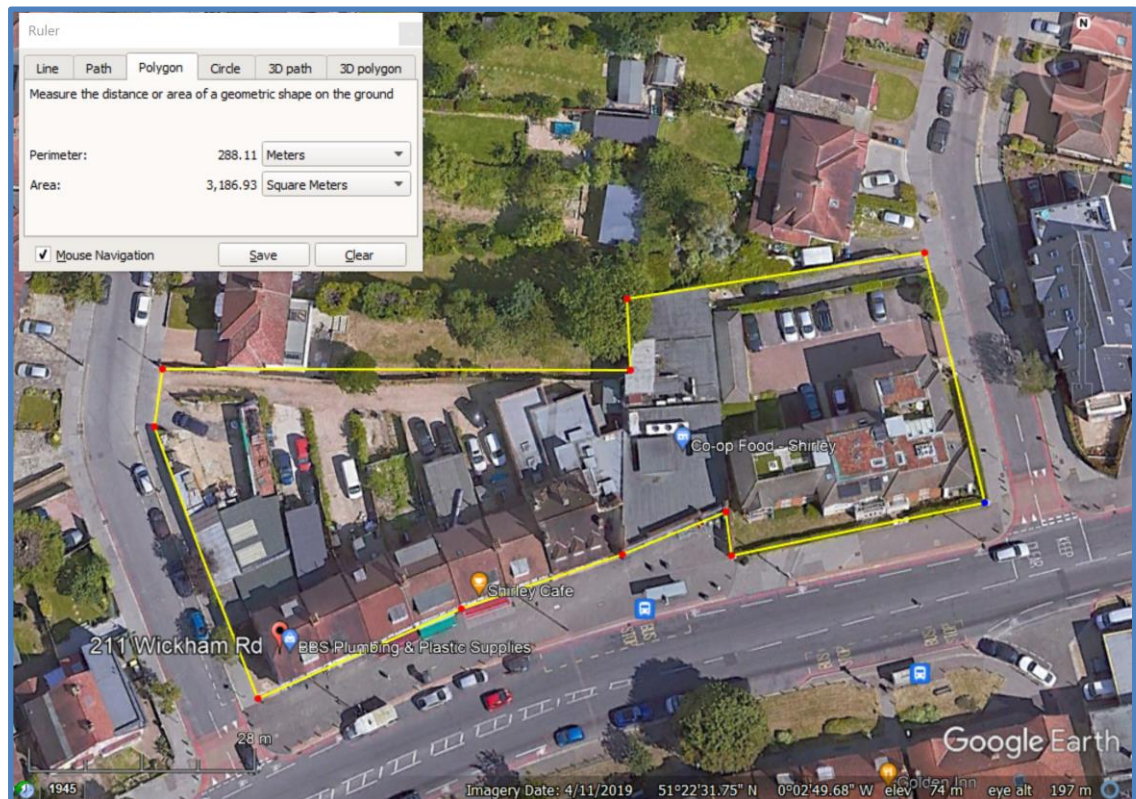
and reflect local aspirations for the development of their area, taking into account the guidance contained in the **National Design Guide** and the **National Model Design Code**. These national documents should be used to guide decisions on applications in the absence of locally produced design guides or design codes.

- 4.4.2 As there is absolutely no guidance provided in either the adopted **Croydon Local Plan** or the **Revised Croydon Local Plan**, and as the **National Model Design Code & Guidance** documents were produced and published in **January 2021** and updated in **June 2021**, it is therefore incumbent on the LPA to use this guidance for local planning proposals against the assessment and analysis as defined in the **National Model Design Code & Guidance** as published and referenced from the **NPPF**.

5 Area Type Design Code Assessment

The assessment of the **Local Area** to define the **Local Design Code** requires an analysis of the locality which will provide appropriate parameters to use for defining the **Local Design Code detail**. The simplest analogy is to assess the **Post Code Area** for such an assessment.

- 5.1.1 The Post Code Area has been assessed roughly from Google Earth.



Google Earth Image of Post Code CR0 8TG assesses Area of 3,186.93 sq.m.

- 5.1.2 The local **Post Code CR0 8TG** has a population of 17 **Ref: 4** in an Area of 3,187m² ≈0.83ha and 15 dwellings from 211a Wickham Road to 223a Wickham Road. **Ref: 5**

Ref: 4 <https://www.postcodearea.co.uk/>

Ref: 5 <https://www.gov.uk/council-tax-bands>

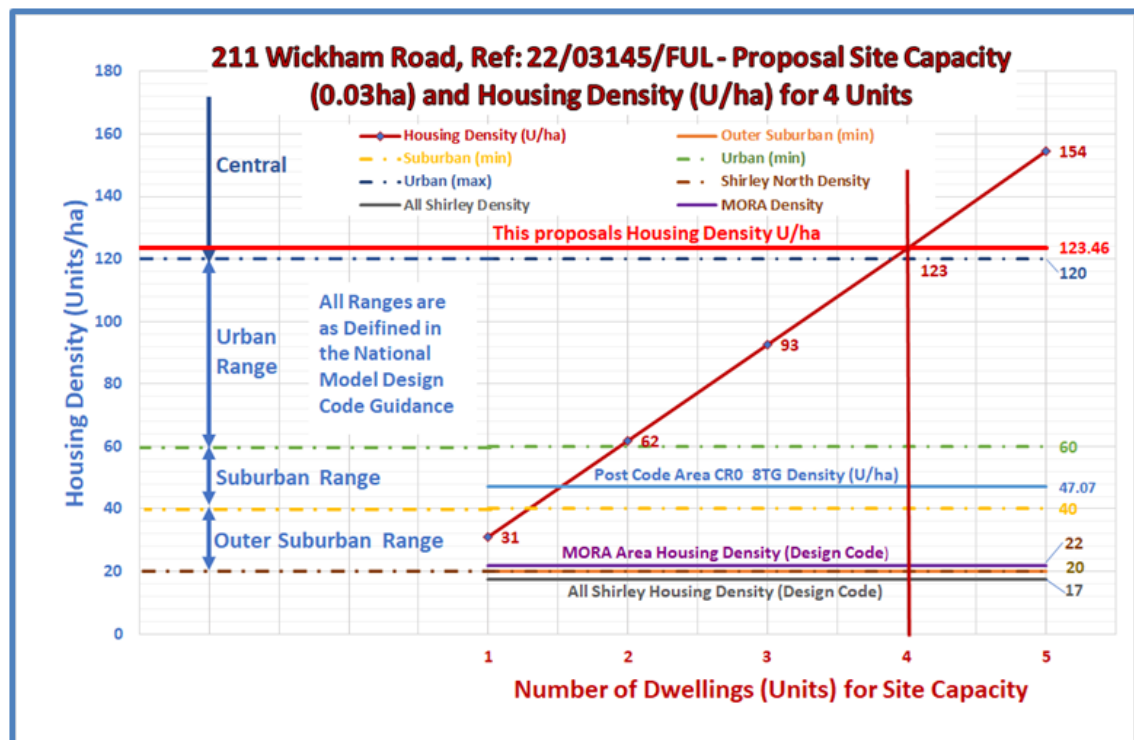
5.1.3 The following analysis and table is of the **Post Code Area CR0 8TG** within the **Shirley Local Centre Area**. This analysis is **conclusive evidence** that the **Shirley Local Centre** is definitely a **"Suburban"** Area Type Setting, as Defined in the **National Model Design Code and Guidance**.

Post Code	CR0 8TG	211 Wickham Road
Area		0.32 hectares
Area (Google Earth)		3186.93 sq.m.
Population (p)		17 persons
Dwelling Units (U)		15 Units
Persons/Unit		1.13 p/Unit
Residential Density (p/ha)		53.34 p/ha
Housing Density (Units/ha)		47.07 Units/ha

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
211 Orchard Ave Proposal	0.32	17	15	53.13	46.88	Suburban
Shirley "Place" ¹ (approx)	770.00	?	?	?	?	?
Average	402.17	17227	7208	44.52	18.63	<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

Assessment of local Area Type Settings

5.2 Site Capacity



Graphical Illustration of Local Area Type Settings and relationship with the proposed development at 211 Wickham Road Post Code CR0 8TG

5.2.1 Assessment and analysis by the **National Model Design Code** as referenced from the **NPPF** which is the highest in the **Planning Policy Hierarchy** clearly indicates that the

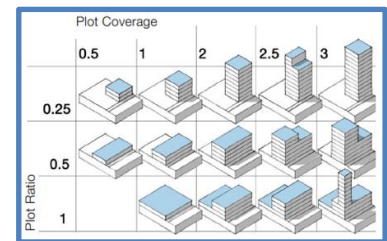
Housing Density of the proposed development is more appropriate in a **“Central” Area Type Setting** than the actual **“Suburban” Area Type Setting** of the **Shirley Local Centre**. This is conclusive evidence of **over development** for the **“Site Capacity”** of **≈0.03ha** in a **Suburban Setting** at **PTAL 2**.

- 5.2.2 **London Plan Policy D3 - Policy D3 Optimising site capacity through the design-led Approach**, requires 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. The “Attributes” are the Number of Dwellings, the Site Area and Area Type Setting.

6 Floor Area Ratio and Plot Footprint Ratio

- 6.1 The **National Model Design Code & Guidance Part 2** indicates the **Built Form** further required limitations of density at Para 29.

29. **Plot Ratio and Plot Coverage:** The former is the ratio between site area and the total building floor area while the latter is the proportion of the site area occupied by buildings. These two measures can be combined to **control development** and should be used alongside good urban design principles. For instance, a Plot Ratio of 2 means that the floor area can be twice the site area while a Plot Coverage of 0.5 **means that only half of the site area can be developed**.



- 6.2 **Plot Ratio or Floor Area Ratio = GIA/Site Area**

The **National Model Design Code Guidance** at **“Built Form”** Para 52 ii (page 20) states:

- ii **Plot Ratio:** Calculated by dividing the gross floor area of the building by the area of the plot, plot ratios along with site coverage should be used alongside good urban design principles to regulate the density of mixed-use and non-residential uses (example below) See B.1.i Density

- Town Centres: Plot Ratio >2
- Urban Neighbourhoods: Plot Ratio >1
- Suburbs: Plot Ratio <0.5

- 6.3 **Plot Ratio or Floor Area Ratio = GIA/Site Area**

The proposed development has a site area of **324m²** as indicated on the proposal Application Form and the offered **Gross Internal Area** of **199.7m²** equates to a **Floor Area Ratio** of $324/199.7 = 0.62$. **this Exceeds the Less than (<) 0.5 guidance** by a **Percentage increase of** $= |0.5 - 0.62|/0.5 = 0.12/0.5 = 0.24 = 24\%$ which is a **significant increase**.

7 Residential Density and Public Transport Accessibility

- 7.1 It is surely people who require supporting infrastructure and accessibility to **Public Transport Services** rather than ‘**Habitable Rooms**’ and therefore the appropriate parameter for **Residential Density** is ‘**persons per hectare**’ – NOT **Habitable Rooms per hectare**. The preferred parameter is therefore **bedspaces per hectare** as shown in the parameter Table at the head of this formal representation.

7.2 The **Application Form** for this proposal at **211 Wickham Road** states that the **Site Area** is **324sq.m.** equivalent to **0.0324ha**.

7.3 The **Residential Density** as calculated from the **Application Form** is **7** persons $7/0.0324\text{ha} = 216.05\text{bedspaces/ha}$ (or $8.5/0.0324 = 262.35\text{hr/ha}$).

7.4 Required Public Transport Accessibility Level (PTAL).

7.4.1 It is presumed that the **Area Type** as defined by the **National Model Design Code & Guidance** at the **low value of the Density Range** would be of **Lower PTAL** and the **Higher of the Density Range** at the **Higher PTAL**. Assuming this to be the objective, the distribution over the lower and higher Ranges should incrementally increase approximately linearly from **Zero** through to a **PTAL of 6** as defined by **TfL**.

7.4.2 The assessment of **Housing Density** in the **National Model Design Code & Guidance** are **National** figures and therefore a **National** figure for **Residential Density** in occupants per unit would be an appropriate conversion from **Housing Density** to **Residential Density**. As there is no guidance in any **Local Plan** for this assessment, we can use the **National Statista** ^{Ref: 6} latest average occupancy of households in the UK in 2021 at **2.36**.

7.5 Area Type Setting Public Transport Accessibility Level (PTAL) Required

7.5.1 Conversion from Housing Density to Residential Density using the **Statista**TM National conversion factor of **2.36** persons/unit (2021).

Conversion	Housing Density		Residential Density	
	Min	Max	Min	Max
Outer Suburban	20	40	47.2	94.4
Suburban	40	60	94.4	141.6
Urban	60	120	141.6	283.2
Central	120	No Max	283.2	No Max

7.5.2 The following graphical illustration provides an assessment of the required

Conversion Table from Housing Density (U/ha) to Residential Density (Persons/ha)

PTAL to support the proposed development in terms of habitable rooms per hectare (hr/ha) and **bedspaces per hectare (bs/ha)**, assuming a 'linear' incremental increase over the **PTAL ranges 0 through 6**, across the **Setting from low Density to high density of the Area Type Range**.

7.5.3 The **Area Type Setting** at **211 Wickham Road** is presumed to be "**Suburban**" for a **TfL assessment of connectivity** but the **Density in terms of bedspaces per hectare** at **216.05bs/ha** is within the **mid-range** of an **Urban Area Type Setting** or at **262.35hr/ha** is within the **lower** of the **Central Area Type Setting** range and would require a **PTALs** of:

$$y = mx + c \quad \text{where } y = \text{Density}, \quad m = \frac{\delta y}{\delta x}, \quad x = \text{PTAL} \quad \& \quad c = y \text{ when } x = 0$$

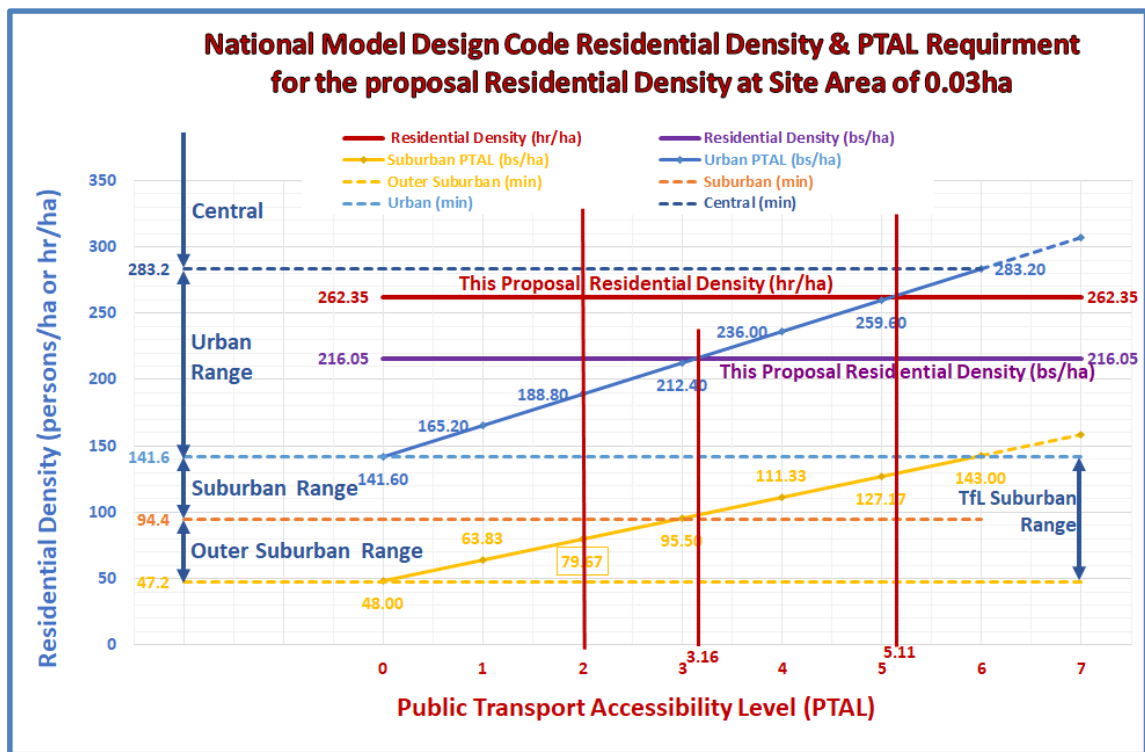
For a **Residential Density** of **216.05** persons (bedspaces) per hectare:

$$\therefore 216.05 = \left(\frac{283.2 - 141.6}{6} \right) * x + 141.6 \quad \therefore x = \frac{216.05 - 141.6}{23.6} = 3.16 = \text{PTAL}$$

For a **Residential Density** of **262.35** Habitable Rooms per hectare:

$$\therefore 262.35 = \left(\frac{283.2 - 141.6}{6} \right) * x + 141.6 \quad \therefore x = \frac{262.35 - 141.6}{23.6} = 5.11 = \text{PTAL}$$

Ref: 6 [UK average household size 2021 | Statista](https://www.statista.com/statistics/1091117/uk-average-household-size-2021/)



Graphical illustration of required Public Transport Accessibility for the proposal at 211 Wickham Road with actual PTAL of 2

7.5.4 The appropriate **Residential Density** for a “Suburban” Setting at TfL PTAL 2 would be **79.67bs/ha** as can be seen from the Graphical illustration.

7.5.5 The foregoing analysis indicates that the proposal at the offered **Residential Density** in terms of **persons (bedspaces) per hectare (bs/ha)** would require a **PTAL** of **3.16** or for an offered **Residential Density in Habitable Rooms per Hectare (hr/ha)** a **PTAL** of **5.11**, when the available **PTAL** is only available at **PTAL 2** and is unlikely to be improved over the life of the Plan. **Ref: 7**

7.6 **Densification**

7.6.1 The level of densification appropriate at **211 Wickham Road** at the junction of **Ridgemount Avenue** is given at **Revised Croydon Plan Policy SP1.0C c)**.

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.

c. Evolution and gentle densification will be supported across all other residential areas.

7.6.2 However, the policy **SP1.0C** does not quantify exactly what “**Gentle**” densification actually means. Therefore, the ambiguous subjective term “**Gentle Intensification**” is literally meaningless in terms of **Policy** assessment or definition and is NOT quantified or qualified elsewhere in the Plan (i.e., **DM10.11a - d)**.

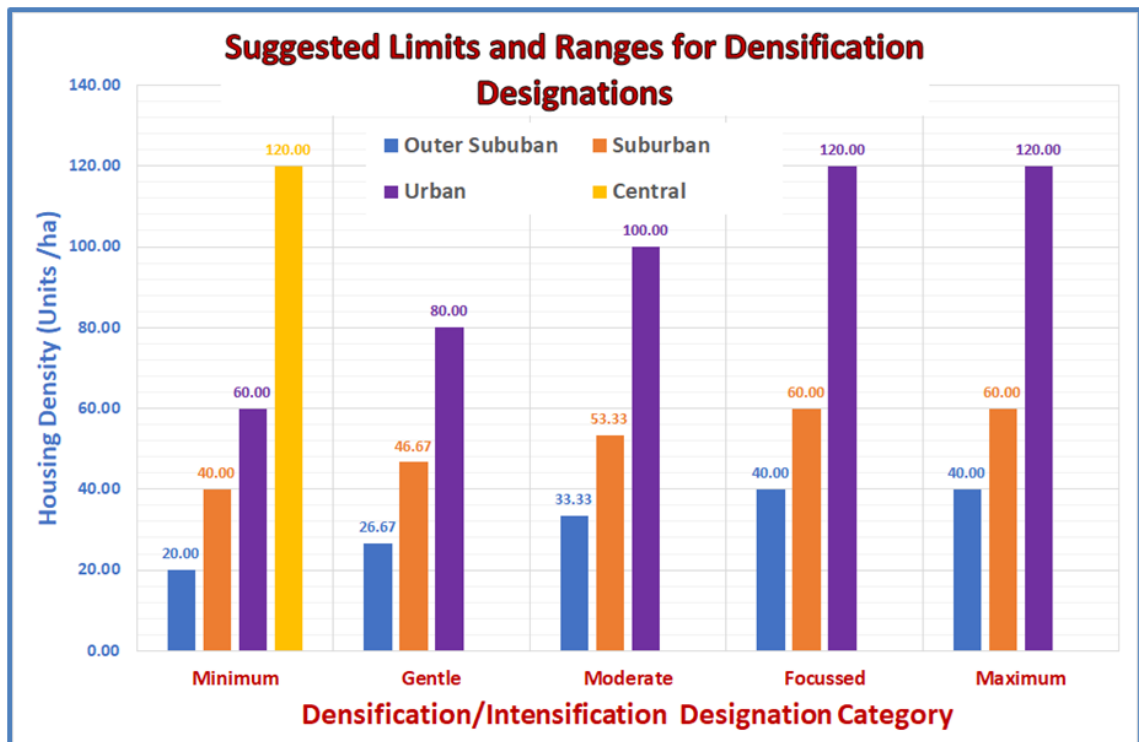
7.6.3 As the **National Model Design Code** Area Types currently rely on the **available supporting infrastructure**, unless there are programs of ‘**improved infrastructure**’

Ref: 7 <https://www.croydon.gov.uk/sites/default/files/2022-01/infrastructure-delivery-plan-2021.pdf>

over the life of the plan, any **intensification** within an **Area Type** or **Setting** relies on that **existing Supporting Infrastructure**. Therefore the **Design Code Density densification** should **remain within** the **Setting** or **Area Type “Ranges”** as defined, in order for adequate **sustainable** developments supporting infrastructure for the proposed development.

7.6.4

We have shown in the **Graphical Illustration**, 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. 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**.



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

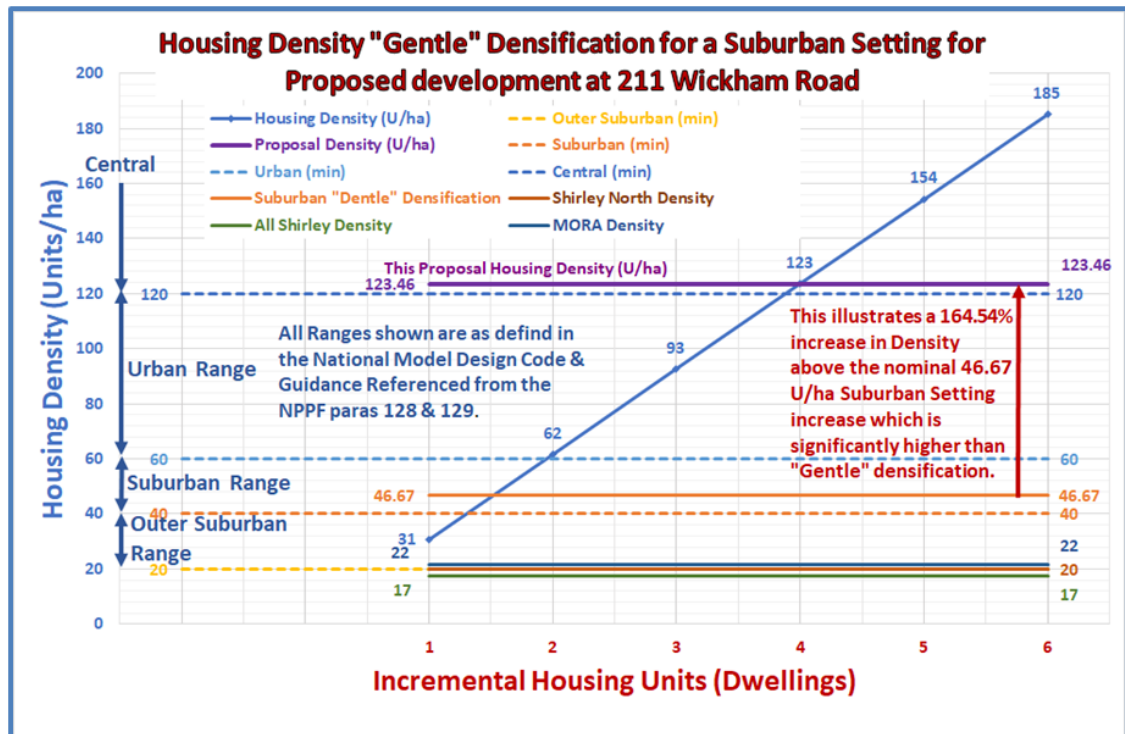
7.6.5

There is no “**Gentle**”, “**Moderate**”, “**Focussed**” or “**Maximum**” **Densification** or **Intensification** for a **Central Area Type** Setting as the only determinant for “**Central**” is the requirement to meet the **Internal Space Standards** as defined at **London Plan Policy D6 Housing Quality and Standards Table 3.1. Minimum Space Standards for New Dwellings**.

7.6.6

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 Plan**. ^{Ref: 8} It is suggested that **poor infrastructure** would require the **Design Code Density** to **tend toward** the **lower value of density**, and **higher infrastructure** provision **tend toward** the **higher value of density** of the **Setting Range**. Similarly, the **Intensification** or **densification** should follow the same Principles.

^{Ref: 8} <https://www.croydon.gov.uk/sites/default/files/2022-01/infrastructure-delivery-plan-2021.pdf>



Graphical Illustration of nominal Suburban densification at 46.67U/ha and the offered proposal Housing Density of 123.46Units/ha which cannot be rationally considered "Gentle" at a 164.54% increase in Density.

- 7.6.7 Thus the proposed development at **211 Wickham Road**, with a **"Site Capacity"** limitation of **0.03ha** and an increased **"Gentle" Densification** in a **"Suburban"** Setting should **NOT** exceed a **Housing Density ≥ 46.67** (i.e., $(40 + (60 - 40) / 3) = 46.67$), but it actually reaches **123.46U/ha**.

This increase as a % is:

$$\text{Percentage of increase} = |46.67 - 123.46| / 46.67 = 76.79 / 46.67 = 1.645 = \mathbf{164.5\%}$$

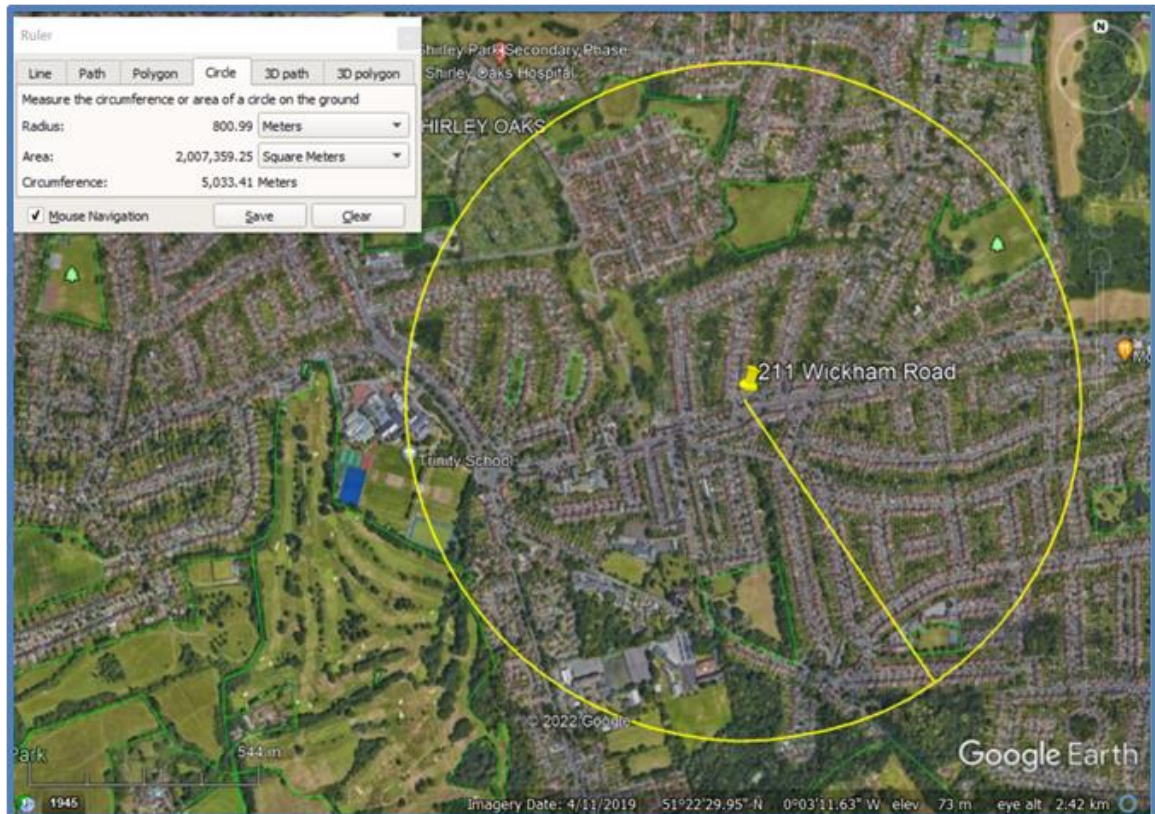
By any assessment, a **164.5%** increase cannot rationally be considered **"Gentle"**.

- 7.7 London Plan "Incremental Intensification".

- 7.7.1 **London Plan (2021) Policy H2 – Small Sites; Para 4.2.4:**

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

- 7.7.2 The Google Earth Image below illustrates that **211 Wickham Road** is greater than **800m** from any **Tram or Train Station**. **211 Wickham Road** is also greater than **800m** from the **Shirley Neighbourhood Centre**. However, the requirement is to be greater than **800m** from a **"District Centre"** and **Shirley** is a **Local Centre**, **NOT** a **District Centre**. Therefore, the location of **211 Wickham Road** is inappropriate for **"Incremental Intensification"** as defined by the **London Plan Para 4.2.4**.



Google Earth Image of Location of 211 Wickham Road exceeding 800m from any Tram/Train Station and exceeding 800m from the nearest District Centre.

7.7.3

If the Case Officer disagrees with any of the above assessments or analysis in any respect and additionally for the assessment of **“Gentle”** *Densification*, we respectfully request that the Case Officers Report to officers or Committee Member, provide an explanation of the **professional appraisal** of **Area Type Assessment** and the professional definition of “Gentle” *Densification* fully supported by the evidence to qualify why the Croydon LPA should have **different Policies** to those espoused by the **National Model Design Code & Guidance** as referenced from the **NPPF paras 128 & 129**.

8 Parking

8.1

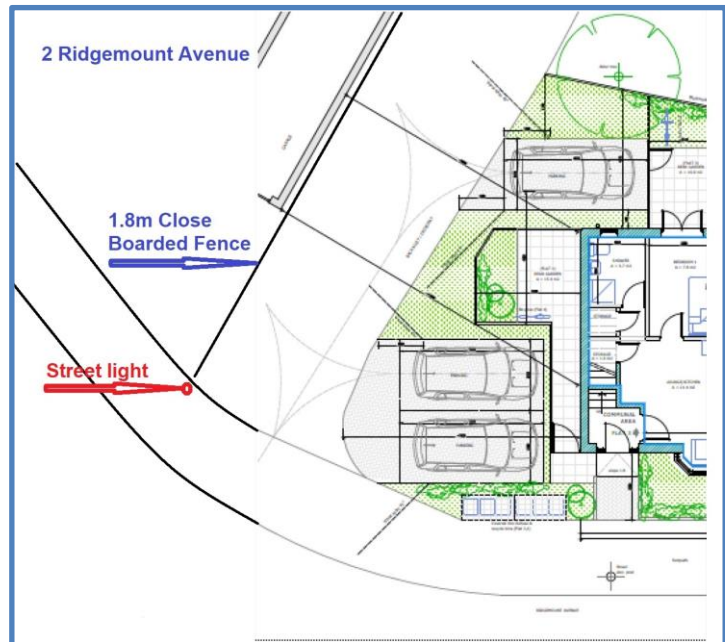
The Croydon Plan (2018) Parking provision stated at **Table 10.1** for dwellings irrespective of number of bedrooms or PTAL, is 1 space per dwelling which totals up to 4 spaces for the proposal. The **Revised Croydon Plan Table 10.1** states up to 3 bedrooms requires 1 to 2 spaces and 0.75 spaces for 1-bedroom dwellings which totals **4.25** for the proposal.

Parking Provision		Outer London - PTAL 2		
Unit	Bedrooms (b)	Croydon Plan	Revised Croydon Plan	London Plan
Flat 1	3	1	2.00	1.00
Flat 2	1	1	0.75	0.75
Flat 3	1	1	0.75	0.75
Flat 4	1	1	0.75	0.75
Totals	6	4	4.25	3.25

8.2

The **London Plan** for Outer London dwellings at **PTAL 2** requires 1 space for 3-bedroom dwellings and 0.75 spaces for 1-bedroom dwellings which totals **3.25** for the proposal.

8.3 It should be noted that the boundary with the adjacent dwelling at **2 Ridgemount Avenue**, has a **1.8m** high, close boarded wooden fence up to the public footpath terminating with a streetlight. This has a detrimental effect of the right hand (North) sight lines when exiting the passageway.



8.4 Accepting that the vehicles are parked as shown on the plans provided, in a forward direction, and that the Access Drive is **≈4.7m** wide, it is still unclear how each would park in a forward direction and then exit from the parking bay (if all other Bays were occupied) and then exit the driveway across the footpath in a forward gear safely with adequate sight lines.

8.5 The indication on the ground floor plans shows the swept paths as a '**point of zero dimensions**' rather than '**the physical path of a vehicle**' and especially the **swept paths** of the **forward and rear wheels**. The depicted paths appear to assume on the first reversal, that the front wheels **jump** from **≈40°** to **≈80°** without any **manoeuvre taking place**, which is a **physical impossibility**.

8.6 It is suggested that proper full and effective **swept path illustrations** for **entrance and exit to/from each parking bay**, with all other bays occupied and avoiding any collision with the boundary fencing, **be provided for a family sized car of nominal dimensions and wheelbase**, to the case officer for examination **prior to a decision being** made as these vehicle movements would apply for the life of the development.

9 Sustainability and Housing Need

9.1 **NPPF Para 7 States:**

9.1.1 *"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** Ref: 9 ... "*

9.1.2 For **Sustainability**, developments require adequate **supporting infrastructure**, but there is **NO planned** provision of new improvements to the existing Infrastructure Ref: 10 for **Shirley** over the life of the Plan.

Ref: 9 Resolution 42/187 of the United Nations General Assembly

Ref: 10 <https://www.croydon.gov.uk/sites/default/files/2022-01/infrastructure-delivery-plan-2021.pdf>

9.2 Housing Need

9.2.1 The allocation of housing **“need”** assessed for the **“Shirley Place”** [770ha] over the period **2019 to 2039** is **278** (See Croydon Revised Local Plan **Ref: 11** 2021 **Table 3.1**). This equates to **≈14 dwellings per year**.

9.2.2 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:

9.2.3 The FOI response indicated, the **Shirley “Place”** as defined in the Local Plan has an area of **approximately ≈770 ha** (i.e., *The LPA has no idea of the Areas of the “Places” of Croydon*) 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**.

The statement of equivalence of the Sum of the Wards equals the Area of the “Place” is ‘NOT True’ as described later.

9.2.4 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**.

9.2.5 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”*

9.2.6 Analysis of the recorded data shows that 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**.

9.2.7 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** i.e., for the **‘Whole’ of the Shirley “Place.”**

9.2.8 This is $|278 - 1257.5|/278 = 979.5/278 = 3.5234 = 352.34\%$ Increase for the **Shirley “Place” estimate** 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**.

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

9.2.9

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 2 and there is no probability for increase in supporting infrastructure.

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

Results of Freedom of Information (FOI) request Ref: 4250621 on 31st Jan 2022.

Completions (Not including approvals not yet started - see FOI Ref: 4250621 on 31st January 2022)	2018	2019	2020	2021 (Aug)	Total	20 Yrs (Projected)	Estimated completed 2021
Shirley North Ward	45	87	69	12	213	1095	18
Shirley South Ward	10	15	0	5	30	162.5	7.5
Shirley Place (Estimate ^{Note 1}) #1	55	102	69	17	243	1257.5	25.5
Target (278 over 20 yrs) #2	13.9	13.9	13.9	9.27	55.6	278	13.9
% increase [(#1-#2)/#2] %	295.68%	633.81%	396.40%	83.45%	352.34%	352.34%	83.45%

Note 1 : The FOI indicates the Shirley Place to be 770ha whereas Shirley North plus Shirley South Wards total 715.2ha

Completions Analysis Target Outturns

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

9.2.10

The **Build Rate Delivery** of dwellings over **3 years** for all **Shirley** is averaging at **55 + 102 + 69 = 226 Ave ≈ 75.33/yr. dwellings per year**, so over **20** years the **Net Increase** will be **≈1507 dwellings**. (Exceeding the **278 Target** by **≈1,229**). The Target for the Shirley **"Place"** at **Croydon Plan Table 3.1** of the Revised **Croydon Local Plan** indicates a Target of **278 dwellings over the period 2019 to 2039**.

9.2.11

This current rate (if retained) 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 **≈770ha**. The total Area of **Shirley North & South Wards** is **715.2ha** (GLA figures) therefore, there is **≈54.8ha excess of land** which is 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**).

- 9.2.12 This rate (if retained) means that the number of developments would **significantly exceed** the available **supporting infrastructure** provision which has been acknowledged as unlikely to be improved over the life of the Plan.
- 9.2.13 It is therefore plainly obvious that the **inability to contain or mitigate the excessive outturns** above the stated **Targets** is a **significant failure** to meet the **legally required objectives** of **Sustainability** ^{Ref: 12} as defined in the **NPPF Chapter 2. Achieving sustainable development** ^{Ref: 13} as Shirley has no prospect of **infrastructure improvement** over the **life of the Plan**. The **Sustainability of Developments** is a **legal** requirement of **development approvals** and thus could be **legally challenged**.
- 9.2.14 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.**
- 9.2.15 We challenge the use of **“Place” Targets** if those Targets for each Place are **NOT monitored** or if **deviating from the requirement**, there is no **mitigating action** to **manage those Targets within sustainable limits**.
- 9.2.16 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 or the developments are unsustainable with current supporting infrastructure.

10 Summary and Conclusions

10.1 Initial observations

- 10.1.1 The Area Type Settings and designation of **Shirley Local Centre** Area of **“Focussed Intensification”** has been removed from the emerging **Revised Local Plan** ^{Ref: 14 Para 48} which carries more weight the nearer to its adoption.

10.2 Building Line Set-Back

- 10.2.1 The building line is created by the primary front face of buildings along a street and is a key element of **Design Code** of the locality. The **National Model Design Code & Guidance** requires **all new development** should follow the **established building line** where it exists.
- 10.2.2 Therefore the **Building Line Set-Back** for this proposed development should follow the **existing Building Line Set-back** as it follows the curve of **Ridgemount Avenue**. Failure to meet this Policy requirement is grounds for a **refusal**.

^{Ref: 12} <https://www.legislation.gov.uk/ukpga/2004/5/section/39>

^{Ref: 13}

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf

^{Ref: 14}

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf

10.3 Shirley Local Centre Assessment

10.3.1 Although the development Site is located within an area designated appropriate for **“Focussed Intensification”** the emerging **Revised Local Plan** has omitted this **“Focussed Intensification”** Designation from this locality due to insufficient and inadequate **supporting infrastructure** currently and in the foreseeable future. The location is therefore only appropriate for **“Gentle”** densification as defined in the emerging **Revised Local Plan Policy SP1.0C c)**.

10.3.2 The **TfL Public Transport Accessibility Level (PTAL)** is level **2** and remaining at **PTAL 2** until at least 2031 (Forecast). There is no probability of improved infrastructure over the life of the Plan.

10.4 Design Codes & Guidance

10.4.1 There is no guidance to assess local **Design Codes** in either the adopted or revised **Croydon Local Plan** or in the **London Plan**.

10.4.2 The only Design Code assessment and Guidance is contained in the **National Model Design Code & Guidance** published by the DLUHC and referenced from the NPPF at paras 128 & 129.

10.5 Area Type Design Code Assessment

10.5.1 The Local Design Code Area Type Setting evaluated over the **Post Code Area** of **CRO 8TG** with an **Area of 0.32ha** at **15 Dwellings** with an occupancy of **17 persons** results in a **Housing Density of 47.07 Units/ha** and **Residential Density of 53.34 bs/ha**. This places the **Design Code Area Type** within a **“Suburban”** Setting in the **Range 40 to 60 U/ha** as defined by the **National Model Design Code & Guidance**.

10.5.2 Assessment in accordance with the **National Model Design Code** clearly indicates that the **Housing Density** at **123.46U/ha** of the proposed development is more appropriate in a **“Central” Area Type Setting** than the actual **“Suburban” Area Type Setting** of the **Shirley Local Centre**. This is conclusive evidence of **over development** for the **“Site Capacity”** of **≈0.03ha** in a **Suburban** Setting at **PTAL 2**.

10.6 Floor Area Ratio and Plot Footprint Ratio

10.6.1 The proposed development has a site area of **324m²** and the offered **Gross Internal Area** of **199.7m²** equates to a **Floor Area Ratio** of $324/199.7 = 0.62$. **exceeding 0.5** recommended in the **National Model Design Code Guidance** by **24%**.

10.7 Residential Density and Public Transport Accessibility

10.7.1 The **Area Type Setting** at **211 Wickham Road** is presumed to be **“Suburban”** for a **TfL assessment of connectivity** but the **Density in terms of bedspaces per hectare** at **216.05bs/ha** is within the **mid-range** of an **Urban Area Type Setting** or at **262.35hr/ha** is within the **lower** of the **Central Area Type Setting** range.

10.7.2 The offered **Residential Density** in terms of **persons (bedspaces) per hectare (bs/ha)** would require a **PTAL** of **3.16** or for a **Residential Density in Habitable Rooms per Hectare (hr/ha)** a **PTAL** of **5.11**, when the available **PTAL** is only available at **PTAL 2**.

10.8 Densification

- 10.8.1 The level of densification appropriate at **211 Wickham Road** at the junction of **Ridgemount Avenue** is given at **Revised Croydon Plan Policy SP1.0C c). i.e., Evolution and gentle densification.**
- 10.8.2 The proposed development at **211 Wickham Road**, with a **Site Capacity** limitation of **0.03ha** and an increased **“Gentle” Densification** in a **“Suburban”** Setting should **NOT** exceed a **Housing Density** **>~46.67** (i.e., $(40 + (60 - 40) / 3) = 46.67$, but it actually reaches **123.46U/ha**.
- 10.8.3 This increase in Housing Density as a % over the minimum of the range reflecting a Low PTAL of 2 is:

Percentage of increase = $|46.67 - 123.46| / 46.67 = 76.79 / 46.67 = 1.645 = \mathbf{164.5\%}$

By any assessment, a **164.5%** increase cannot be considered a **“Gentle” densification**, nor by any rational observation.
- 10.8.4 **211 Wickham Road** is also greater than **800m** from the **Shirley Neighbourhood Centre**. However, the requirement is to be greater than **800m** from a **“District Centre”** and **Shirley** is a **Local Centre**, **NOT** a **District Centre**. Therefore, the location of **211 Wickham Road** is inappropriate for **“Incremental Intensification”** as defined by the **London Plan Para 4.2.4**.

10.9 Sustainability and Housing Need

- 10.9.1 We have shown that the recent developments in the **Shirley North Ward** have significantly exceeded the **London Plan Targets** over the 2019-2039 period at the current build and approval rates which proves that housing **“need”** in the **Shirley North Ward** has already been met.
- 10.9.2 It is therefore plainly obvious that the **inability to contain or mitigate** the **excessive outturn** above the stated **Targets** is a significant failure to meet the objectives of **Sustainability** **Ref: 15** as defined in the **NPPF Chapter - 2 Achieving Sustainable Development** **Ref: 16** as Shirley has no prospect of **infrastructure improvement** over the life of the Plan and the **Sustainability of Developments** is a **legal** requirement of **development approvals** and thus could be legally challenged.

11 The Planning Process

- 11.1 The forgoing submission is compiled on the grounds of **National and Local Planning Policies** and based upon **rational observations and evaluation**. There have been no **vague or subjective assessments** and therefore we respectfully request that all our foregoing analysis and evidence is a sound assessment and therefore extremely relevant to the final determination.
- 11.2 Local Residents have **“lost confidence in the Planning Process”** resultant on recent local **over-developments** and lack of additional supporting infrastructure,

Ref: 15 <https://www.legislation.gov.uk/ukpga/2004/5/section/39>

Ref: 16

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf



which, in the majority of cases, disregarded 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 supported and 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**.

- 11.3 We urge the **LPA to refuse this application** and request the applicant to submit a revised proposal meeting all Planning Policies. *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

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Cllr. Mark Johnson

Bcc:

MORA Executive Committee, Local Affected Residents', Interested Parties

Croydon Central
Shirley North Ward
Shirley North Ward
Shirley North Ward