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**Monks Orchard
Residents' Association
Planning**

27th October 2022

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Reference:	22/03970/FUL
Application Received:	Mon 26 Sep 2022
Application Validated:	Mon 26 Sep 2022
Address:	46 The Glade Croydon CR0 7QD
Proposal:	Demolition of existing property and construction of 4 no. 3 bedroom houses with parking spaces.
Status:	Awaiting decision
Consultation Expiry:	Sun 30 Oct 2022
Determination:	Mon 21 Nov 2022
Case Officer:	Christopher Grace

Dear Mr Grace – Case Officer,

Please accept this letter as a formal objection to **Application Ref: 22/03970/FUL** for Demolition of existing property and construction of 4 no. 3 bedroom houses with parking spaces.

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.

Design & Access Statement Illustration:



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The Proposed Parameters:

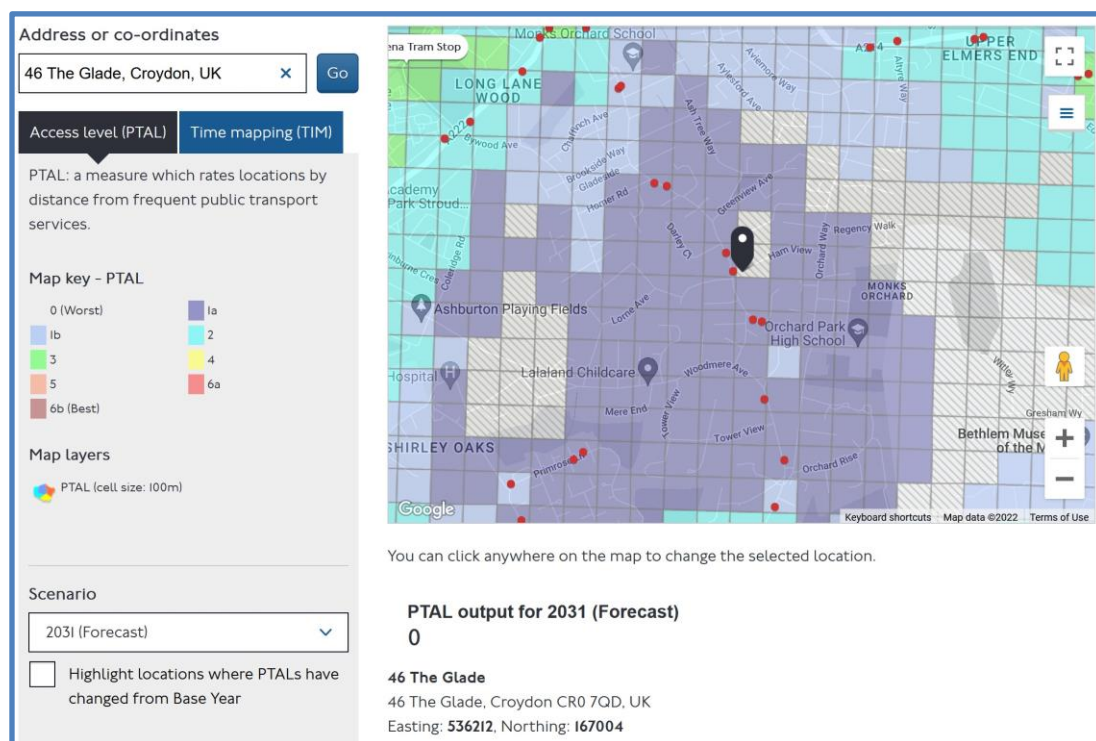
46 The Glade			App Ref: 22/03970/FUL							
Site Area	1020	sq.m.	Supplied Drawings				Floor Area Ratio		0.62	
App Form	0.102	ha	Bedrooms Density		117.65 b/ha		Plot Area Ratio		N/A	
Post Code	CR0 7QD		Residential Density		196.08 bs/ha		Post Code	15.89	U/ha	
Area	1.51	ha	Residential Density		196.08 hr/ha		Units	4		
Persons	60	(p)	Housing Density		39.22 U/ha		PTAL	2011	0	
Dwellings	24	(Units)	Ave Density/Unit		5.00 hr/Unit		PTAL	2031	0	
Unit	Type	Floor	Bedrooms (b)	Bed Spaces (bs)	Habitable Rooms (hr)	GIA (Offered)	GIA (Required)	In-Built Storage (Offered) (Note 1)	In-Built Storage (Required)	Parking (Disabled)
Unit 1	Terraced M4(2)	Ground	0	0	1	68.0	99	N/A	2.5	2
		First	2	3	3	55.4		N/A		
		Second	1	2	1	34.5		N/A		
Sub Totals			3	5	5	157.9	99	N/A	2.5	2
Unit 2	Terraced M4(2)	Ground	0	0	1	68.0	99	N/A	2.5	1
		First	2	3	3	55.4		N/A		
		Second	1	2	1	34.5		N/A		
Sub Totals			3	5	5	157.9	99	N/A	2.5	1
Unit 3	Terraced M4(2)	Ground	0	0	1	68.0	99	N/A	2.5	1
		First	2	3	3	55.4		N/A		
		Second	1	2	1	34.5		N/A		
Sub Totals			3	5	5	157.9	99	N/A	2.5	1
Unit 4	Terraced M4(2)	Ground	0	0	1	68.0	99	N/A	2.5	2
		First	2	3	3	55.4		N/A		
		Second	1	2	1	34.5		N/A		
Sub Total			3	5	5	157.9	99	N/A	2.5	2
Grand Total			12	20	20	631.6	396	N/A	10.0	6
Note 1: Storage Space on floor plans have no dimensions, Also Not mentioned in the Design & Access Statement.										

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1 Initial Comments and Observations

- 1.1 We only object when proposals do not comply with current adopted or emerging 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 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 (January 2021 & June 2021);
 - The **London Plan** (March 2021)
 - The **Croydon Local Plan** (2018)
 - The Draft **Revised Croydon Local Plan** (November 2021 Not yet adopted)

- 1.3 The **Design & Access Statement** at Schedule of Accommodation states: "4 Nos. 3 Bedroom **4-person M4(2) Compliant** Dwellings". It is noted that the Disabled Parking Bay is located on the forecourt of **Unit 2**, but that **Unit 2** is to **Building Regulation M4(2)** and not wheelchair compliant **M4(3)**. All Units are stated to be **M4(2) compliant**.
- 1.4 The **Design & Access Statement** at Schedule of Accommodation states "**4 x No. 3 Bedroom 4-person**"; however, the supplied floorplans clearly show the first-floor accommodation for **Bedroom 2** having **two single beds** and **Bedroom 4** with **one single bed** and the **Second-Floor accommodation Bedroom 1** has **one double bed for two persons**. This totals **3 bedrooms & 5 persons per Unit** as all units are to the same design. The occupancy therefore for the development is **12 Bedrooms with 20 bedspaces in 4 Units** giving a **Housing Density** of $4/0.102 = 39.22 \text{ units/ha}$ and a **Residential Density** of $20/0.102 = 196.08 \text{ bs/ha}$.
- 1.5 **The Public Transport Statement**
- 1.5.1 **Para 3.10** of the **Transport Statement** provided by the applicant indicates the TfL **PTAL** range to be **1** through to **6b** which is **NOT** correct. The TfL **WebCAT** **Ref:1** has **PTAL** Range of **0** through to **6b** and the **PTAL at 46 The Glade is clearly 0 (Zero)**.



TfL WebCAT search returns PTAL 0 for 46 The Glade (Easting: 536212, Northing: 167004) not as APPENDIX A of the Transport Statement.

Ref:1 <https://content.tfl.gov.uk/connectivity-assessment-guide.pdf>

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- 1.5.2 The TfL WebCAT ^{Ref:2} returns **Zero (0)** at Base Year 2011, & 2021 & Forecast 2031 for **46 The Glade** as input on the search which are (***Easting: 536212, Northing: 167004***) which are different to those at **Appendix A** of the **Transport Statement**. As it is possible to click anywhere on the Map to select a location (see *note on the illustration above*) the Applicant has moved the location slightly westward & southward to indicate a PTAL of **1a** This is a ***misrepresentation*** of the true **PTAL for 46 The Glade, possibly intentionally or by accident, either are inappropriate.**

1.6 Parking

- 1.6.1 Parking Bays for **Unit 4** occupants are stacked in-line (4a & 4b) such that if both bays are full and the rear vehicle (4b) is required for travelling, the vehicle parked in the forward bay (4a) will need to be moved to allow exit. It is probable that the driver of vehicle (4b) will need to have keys to (4a) in order to access the vehicle and move it to a convenient position to allow exit of (4b). If so, the vehicle (4a) could be moved to a new position either to the rear of the disabled bay or parallel with the refuse bins (for Units 3 & 4) as any other position would prevent exit via the dropped kerb access to the forecourt from the road. The Driver could then again access the vehicle 4b and drive out of the parking bay onto the road (The Glade).
- 1.6.2 However, it is then necessary for the driver to park up on the road and walk back to vehicle 4a and move it back to its parking bay, now likely to be 4b, before returning to the vehicle parked in the road (The Glade) and drive off to the required destination. This is likely to be an extremely onerous aggravation to the future occupants of Unit 4, especially in periods of high precipitation. This Swept Path configuration is NOT shown on the "Proposed Swept Path Analysis" Drawing No. 21031-01. This is considered an extremely poor design and is an indication of inadequate Site Area to accommodate the required Parking provision with acceptable manoeuvrability. This is Bad Practice and will remain as such for the life of the development, if approved.

2 Site Capacity.

2.1 London Plan Policy D3 – Optimising Site Capacity through the Design-Led Approach

2.1.1 The design-led approach:

*"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*

^{Ref:2} <https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcat/webcat?Input=46%20The%20Glade%2C%20Croydon%2C%20UK&locationId=ChIJH7h7rVUAdkgRePS6ifuACpc&scenario=2031%20%28Forecast%29&type=Ptal>

Policy D2 Infrastructure requirements for sustainable densities), and that best delivers the requirements set out in Part D.”

B Higher density developments should generally be promoted in **locations that are well** connected to jobs, services, **infrastructure** and amenities by **public transport**, walking and cycling, in accordance with **Policy D2 Infrastructure requirements for sustainable densities**. Where these locations have existing areas of high density buildings, expansion of the areas should be positively considered by Boroughs where appropriate. This could also include expanding Opportunity Area boundaries where appropriate

C In other areas **incremental densification** should be actively encouraged by Boroughs to achieve a **change in densities in the most appropriate way**. This should be interpreted in the context of **Policy H2 Small sites**.

3.2.4 Minor developments will typically have **incremental impacts** on **local infrastructure capacity**. The **cumulative demands on infrastructure of minor development should be addressed in boroughs’ infrastructure delivery plans** ^{Ref:3} or programmes. Therefore, it will not **‘normally’** be necessary for **minor developments to undertake infrastructure assessments** or for boroughs **to refuse permission to these schemes on the grounds of infrastructure capacity**.

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.

2.1.2 These Policies are objectives; however, the **London Plan** does not provide guidance or an adequate methodology for implementation of the **“Design-Led-Approach”**. The **Supplementary Planning Guidance (SPG) for Optimising Site Capacity** has been published for consultation in February 2022 but has not yet been adopted.

2.1.3 The **Policy Para 3.2.4** acknowledges Minor Developments have **incremental impacts on local infrastructure capacity** which should be addressed by the **LPA’s Infrastructure Delivery Plans** (See ^{Ref:1}) but the **Croydon Infrastructure Delivery Plans** do not provide any improvement for **Shirley Wards** over the life of the Plan. Therefore, the effects of **“cumulative” increase in densities** must be addressed during the **“assessment of each proposed development”**. If these **cumulative increases** are **NOT** addressed, developments are **NOT** meeting the legal requirement for sustainability ^{Ref:4 NPPF Section 2}.

^{Ref:3} <https://www.croydon.gov.uk/planning-and-regeneration/planning-policy/planning-evidence-and-information/local-plan-evidence-topic/infrastructure-delivery-plan>

^{Ref:4}

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

2.2 The NPPF para 129 states:

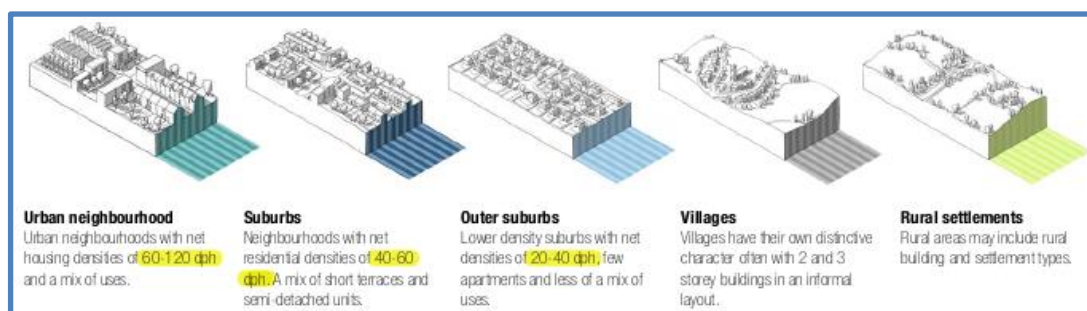
“129. ***Design guides and codes** can be prepared at an area-wide, neighbourhood or site-specific scale, and to carry weight in decision-making should be produced either as part of a plan or as **supplementary planning documents**. Landowners and developers may contribute to these exercises, but may 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.”*

2.3 Croydon Local Plan

2.3.1 The **Revised Draft Croydon Local Plan** only has Two (2) occurrences listing “Design Codes” at **DM 38.1 & DM38.2**, both referring to the **Croydon Opportunity Area** and neither providing any guidance or analysis for assessment.

2.4 The LUHC National Model Design Code & Guidance ^{Ref:5} 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, Figure 10 Page 14.



The National Model Design Code parameters Definitions for Local Settings

2.5 Local Design Code Assessment

2.5.1 The Local Design Code assessment requires an analysis of a suitable area which describes the character of the locality.

2.5.2 The most suitable for this assessment is the area of the local **Post Code CR0 7QU** of the proposed development.

2.5.3 The **Post Code CR0 7QU** covers an area of **1.51ha** as measured approximately by Google Earth (see below). The **Valuation Office Agency** ^{Ref:6} (VOA) indicates the Post Code has **24 Dwellings** and the **Post Code Area Data** ^{Ref:7} Indicates occupancy

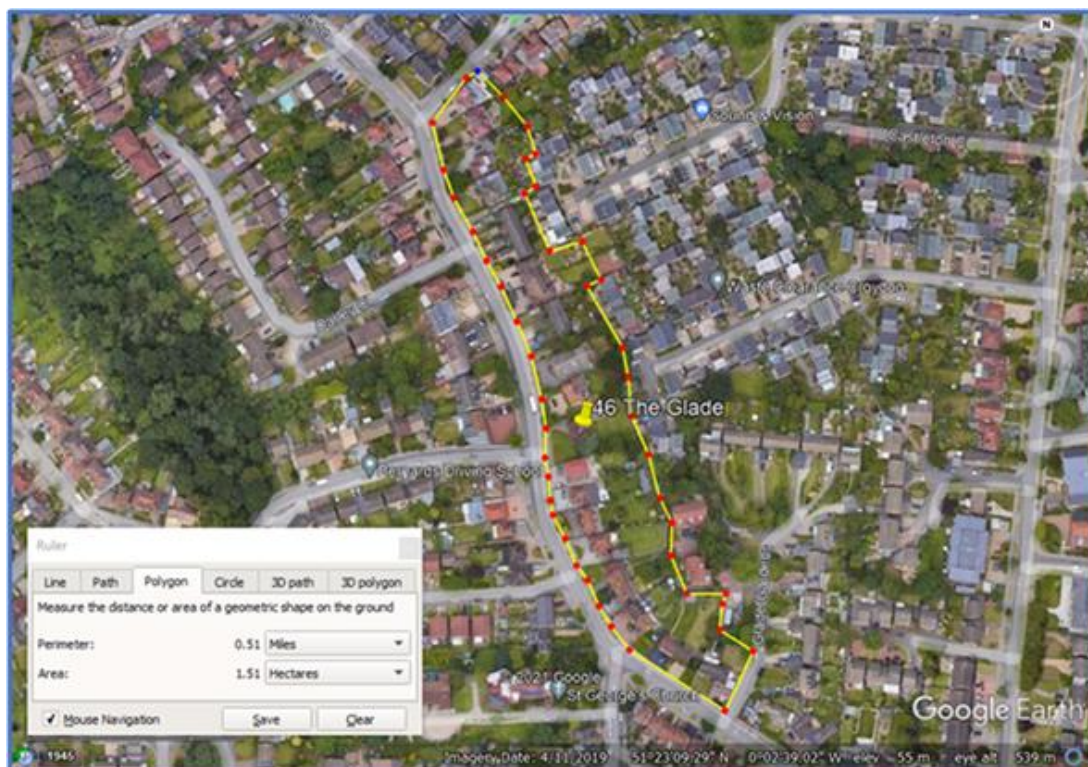
^{Ref:5} <https://www.gov.uk/government/publications/national-model-design-code>

^{Ref:6} <https://www.gov.uk/government/organisations/valuation-office-agency>

^{Ref:7} <https://www.postcodearea.co.uk/>

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of **60 persons**, giving a **Local Design Code Housing Density** of $24/1.51 \approx 15.89\text{U/ha}$ and a **Residential Density** of $60/1.51 \approx 39.74\text{person/ha}$ which clearly places the local **Design Code** in an **"Outer Suburban"** Area Type Setting.



Post Code CRO 7QD \approx Area in hectares as measured using Google Earth.

Location	Area (ha)	Population	Dwellings (Units)	Residential Density (bs/ha)	Housing Density (Units/ha)	"Setting" for Design Code Density
Shirley North Ward	327.90	15666	6555	47.78	19.99	<Outer Suburban
Shirley South Ward	387.30	14147	5919	36.53	15.28	<Outer Suburban
All Shirley	715.20	29814	12474	41.69	17.44	<Outer Suburban
MORA Area	178.26	9283	3884	52.07	21.79	Outer Suburban
Post Code CR0 8S(*)	16.95	627	237	36.99	13.98	<Outer Suburban
Post Code CR0 8T(*)	11.82	644	246	54.48	20.81	Outer Suburban
Post Code CR0 7PL	1.73	47	19	27.17	10.98	<Outer Suburban
Post Code CR0 7QD	1.51	68	28	45.03	18.54	<Outer Suburban
Post Code CR0 8UB	1.70	71	30	41.89	17.70	<Outer Suburban
Post Code CR0 7NE	0.83	26	11	31.33	13.25	<Outer Suburban
Shirley "Place" ¹ (approx)	770.00	?	?	?	?	?
Average	205.08	8787	3670	42.72	17.35	<Outer Suburban
All Shirley	715.20	29814	12474	41.69	17.44	<Outer Suburban
Shirley Place (Estimates)	770.00	33414	13981	43.39	18.16	<Outer Suburban

Note 1: FOI request (Ref: 4250621) on 31st January 2022

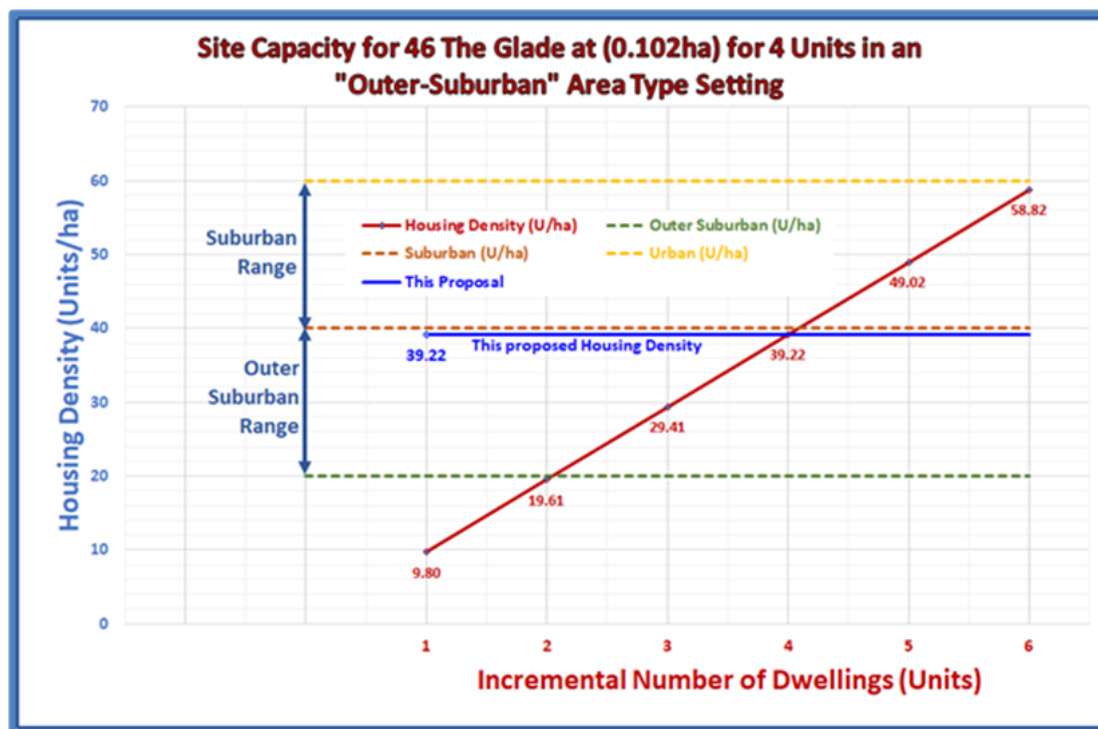
Note 2:

Assessment of Local Design Code Housing Densities within Shirley

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2.5.4

The assessment of the of the proposed development at **46 The Glade** illustrates a **Design Code Housing Density** requirement of “**Outer Suburban**” **Area Type Setting** as defined by the **National Model Design Code and Guidance**.



Assessment of proposals Housing Density for 4 Units on a Site Area of 0.102ha is just within the “Outer Suburban” Area Type Range.

2.5.5

However, it should be recognised that **46 The Glade** is in a **PTAL cell at Level Zero** in the range **0 to 6+** and therefore should be at the **lowest Density** in the Range **20 to 40 U/ha**. (See below Gentle Densification), but the proposal is at the highest-level approaching 40U/ha at **39.22U/ha**.

2.6

Plot Ratio or Floor Area Ratio (FAR) & Plot Coverage Ratio

2.6.1

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

2.6.2

The proposed development has a site area of **1020m²** as indicated on the proposal **Application Form** and the offered **Gross Internal Area** of **631.6m²** equates to a **Floor Area Ratio** of $631.6/1020 = 0.6192$. This is greater than **<0.5** and exceed the recommended Floor Area Ratio for a suburban Area Type Setting by a **Difference** of

$0.5 \text{ and } 0.6192 = |0.5 - 0.6192| / ((0.5 + 0.6192) / 2) = 0.1192 / 0.5596 = 0.213 = \mathbf{21.3\%}$.
or a **Percentage of increase** = $|0.5 - 0.6192| / 0.5 = 0.1192 / 0.5 = 0.2384 = \mathbf{23.84\%}$

2.6.3 The proposed Development therefore exceeds the recommended **National Model Design Code & Guidance Floor Area Ratio** for a **Suburban Area Type Setting**.

2.7 Plot Coverage Ratio = Footprint/Site Area

2.7.1 The proposal documentation does not provide any **building footprint area**. We therefore cannot with 'confidence' calculate the **Plot Covered Ratio**.

3 Growth, Intensification & Density.

3.1 Croydon Local Plan (2018) 'Growth' Policies

3.1.1 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**.

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

3.2 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.

- 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.

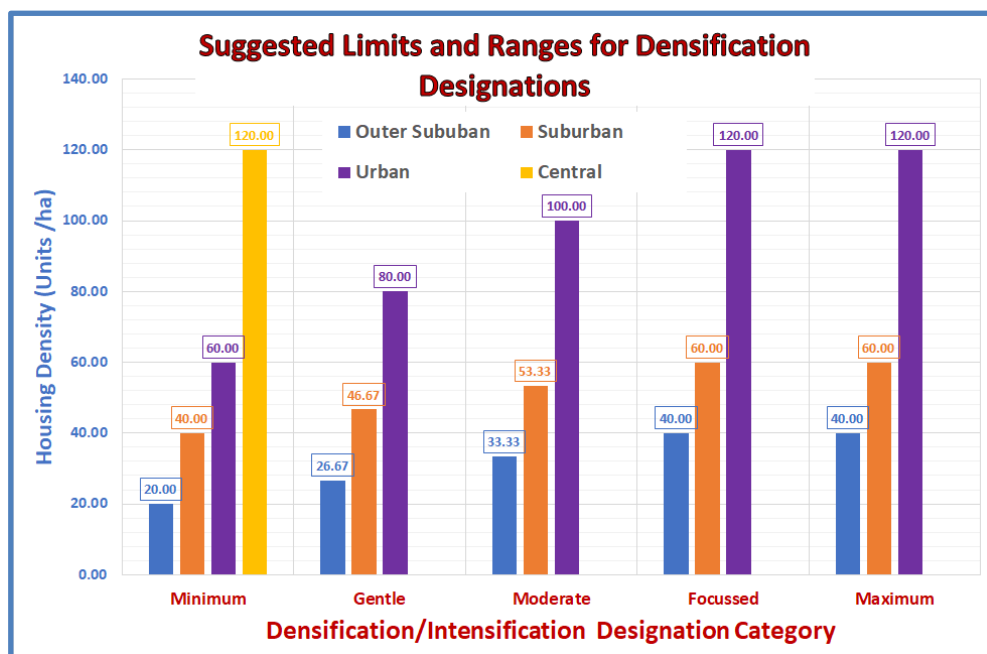
3.2.1 **46 The Glade** is not designated as appropriate for "**Focussed**" or "**Moderate**" densification on the **Policies MAP**. It is therefore appropriate for evolution by "**Gentle**" densification as stated at **SP1.0C para c)**. However, the **Revised Croydon Local Plan** fails to *define* exactly what is meant by "**Gentle**" densification.

3.2.2 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 **Revised Local Plan** (i.e., **DM10.11a - d**).

3.3 Assessment for evolution & regeneration

3.3.1 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 densification** should **remain within** the **Setting** or **Area Type “Ranges”** as defined, in order for adequate “sustainable” supporting infrastructure for the **proposed development**.

3.3.2 We have shown in the following **Graphical Illustration**, an **incremental** increase in **Design Code Density** of $\frac{1}{3}$ “**Gentle**” & $\frac{2}{3}$ “**Moderate**” between Settings for “**Outer Suburban**”, “**Suburban**” and “**Urban**” for “**Gentle**”, “**Moderate**” and for “**Focussed**” Intensification to the maximum of the setting or **densification** as an example. This is our interpretation of the **Local Plan Policy** as determined by logical assessment and analysis, 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 Type

3.3.3 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**.

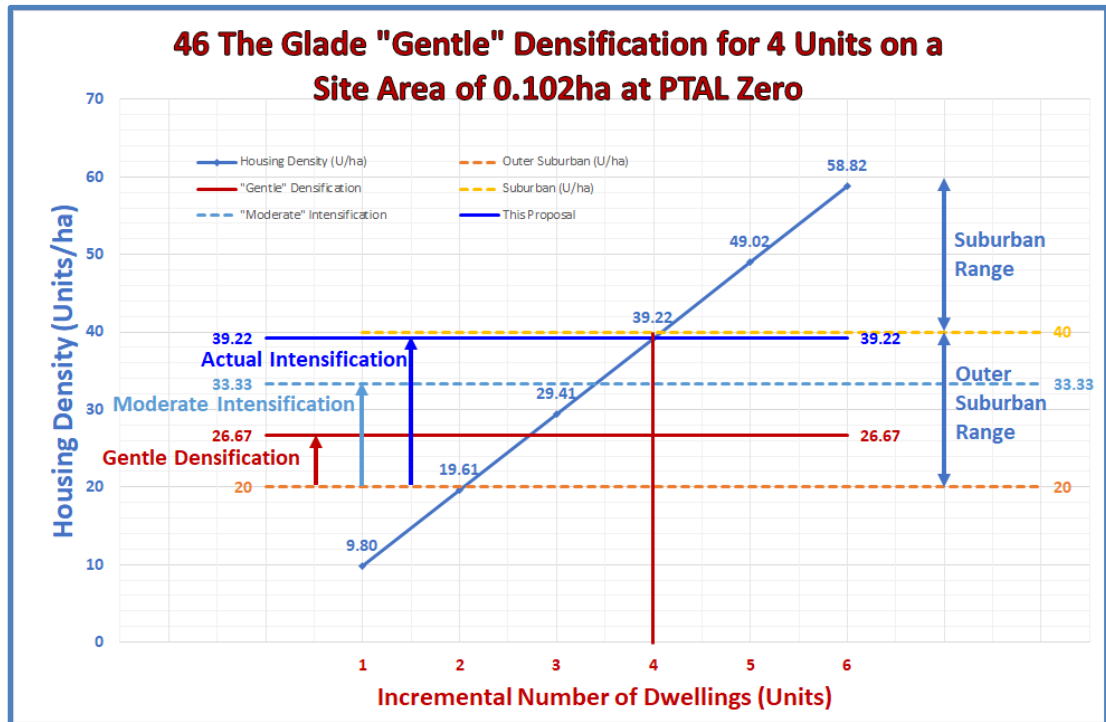
- 3.3.4 It should be clearly recognised that **Shirley** has **NO** prospect of **infrastructure or Public Transport improvement** over the life of the plan as stated in the **LB of Croydon Infrastructure Delivery Plan**.^{Ref: 8} It is suggested that **poor infrastructure** would require the **Design 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 fundamental Principles.
- 3.3.5 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 **PTAL Zero** through to a **PTAL of 6** as defined by **TfL**.
- 3.3.6 Thus for **46 Orchard Avenue**, with a **PTAL of Zero** and a **“Site Capacity”** limitation of **0.102ha**, the **“Gentle” Densification** should **NOT** exceed a **Housing Density >≈26.67Units/ha** (i.e., $(20+(40-20)/3) = 26.67\text{Units/ha}$, but it actually reaches $4/0.102 = 39.22\text{u/ha}$.
- This increase as a % is:
- Percentage Difference** = $26.67 \text{ \& } 39.22 = |26.67 - 39.22| / ((26.67 + 39.22)/2) = 12.55/32.945 = 0.3809 = \mathbf{38.09\%}$.
- Percentage Increase** = $|26.67 - 39.22|/26.67 = 12.55/26.67 = 0.4705661792276 = \mathbf{47.057\%}$.
- 3.3.7 These increases are the percentages **above** the **“Gentle” densification** suggested at **26.67U/ha** to keep within the boundary range and **infrastructure capacity** of the **Outer Suburban Area Type Settings** and **PTAL at Level Zero** currently available and are therefore **inappropriate** for the locality. This level of increased **densification above that appropriate for “Gentle” densification** is **NOT** supported by the **local infrastructure** and as there is no planned increase in **infrastructure** provision for the **Shirley North Ward** over the **life of the Plan**, this proposal is **inappropriate**.
- 3.3.8 This proposed Housing Density at **39.22U/ha**, although within the **Outer Suburban Area Type Setting** exceeds the level of **“Densification”** for the existing **supporting infrastructure** and **Public Transport Accessibility** and therefore cannot be conceivably acceptable as **“Gentle” densification** or **sustainable development**.
- The increase is from the **lowest value of Housing Density** at **“Outer Suburban” Area Type** as the **PTAL is Zero**, the lowest possible **TfL PTAL**.
- % Increase above 20U/ha for **“Gentle Densification”** = **33.33%**
- % Increase above 20U/ha for **“Moderate” Intensification** = **66.65%**
- But the actual Intensification** at **39.22Units/ha** above **20Units/ha** = **96.1% or**
- Percentage of increase above “Gentle” Densification of 26.67U/ha** = **47%**

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

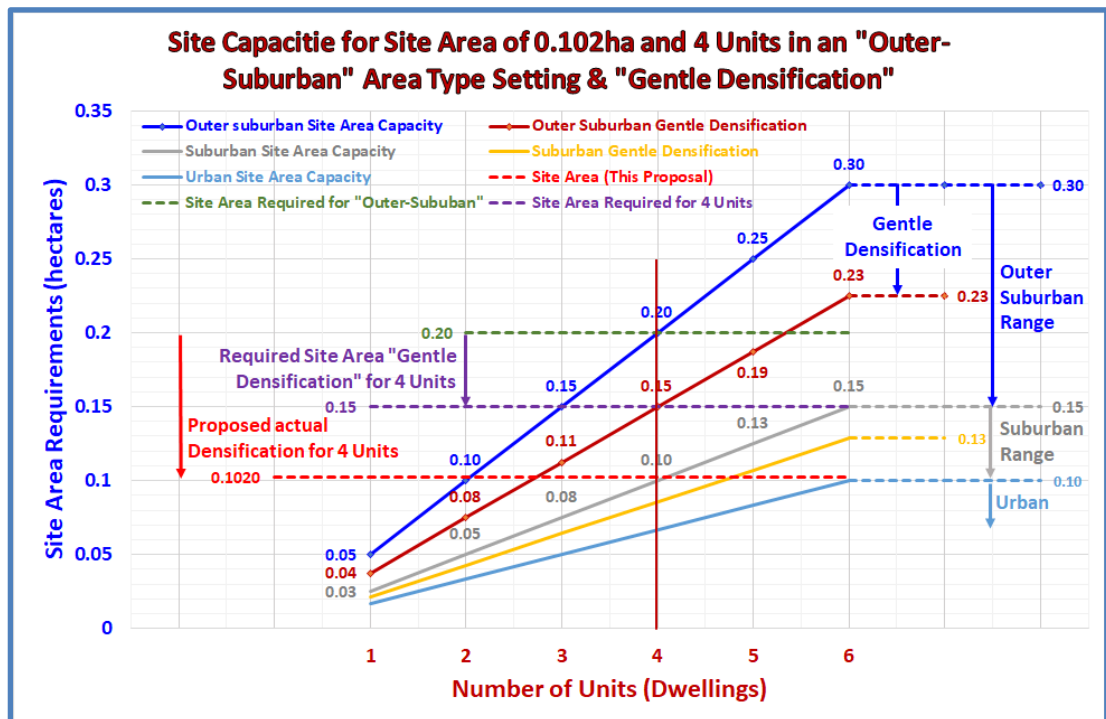


3.4

Incremental “Densification” & “Intensification” Ranges:”



The actual proposal is 96.1% above the Minimum and 47% above the recommended “Gentle” Densification for an “Outer Suburban” Area Type



Site Capacities for “Outer Suburban” & “Suburban” for 4 Units would require 0.20ha and 0.15ha after “Gentle Densification”. 0.102ha can only accommodate ≈3 Units at “Gentle” densification.

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- 3.4.1 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 analysis and assessment suggests that the **“Site Area Capacity”** for **46 The Glade** of **0.102ha** can only accommodate approximately **3 Units, as defined by the National Model Design Code Guidance** even with $\frac{1}{3}$ (Gentle) densification, from 20U/ha to 26.67U/ha (suggested) as the Area Type Setting is **“Outer Suburban”**.
- 3.4.2 The **Site Area** required to accommodate **4 Units** would need to be $4/20 = 0.2\text{hectares}$ reduced to **0.15ha** for an **“Outer Suburban” Area Type Setting** to accommodate **“Gentle” densification**. This would be a Percentage Difference of 0.2 and 0.102 = $|0.2 - 0.102| / ((0.2 + 0.102)/2) = 0.098/0.151 = 0.649 = 64.9\%$ or a Percentage of decrease = $|0.2 - 0.102|/0.2 = 0.098/0.2 = 0.49 = 49\%$.
- 3.4.3 In summary, these **Intensification/Densification designations of the Croydon Local Plan** are **‘meaningless,’** as there is **NO meaningful definition of “Growth” Management Policy**, a fundamental requirement of the job description for the **Croydon LPA “Development Management” Department**.

4 Residential Density and Public Transport Accessibility

- 4.1 It is surely people who require supporting infrastructure and accessibility to **Public Transport Services** rather than **‘Habitable Rooms’** or **‘Housing Units’** and therefore the appropriate parameter for **Residential Density** is **‘persons per hectare’** – NOT Habitable Rooms or Units per hectare. The preferred parameter is therefore **bedspaces per hectare** as shown in the **Parameter Table** at the head of this formal representation. However, in this case *coincidentally*, the Number of **Persons/ha** equates to the number of **Habitable Rooms/ha** at **196.08 bs or hr per hectare**.
- 4.2 The **Application Form** for this proposal at **46 The Glade** states that the **Site Area** is **0.102ha** equivalent to **1020m²** and provides accommodation for **20 persons** (bedspaces) which equates to a residential Density of $20/0.102 \approx 196.08 \text{ bs/ha}$.
- 4.3 Required Public Transport Accessibility Level (PTAL).**
- 4.3.1 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.
- 4.3.2 Conversion from **Housing Density** to **Residential Density** using the **Statista™** National conversion factor of **2.36** ^{Ref:9} persons/unit (2021).

Ref: 9 [UK average household size 2021 | Statista](https://www.statista.com/statistics/1101147/uk-average-household-size-2021/)

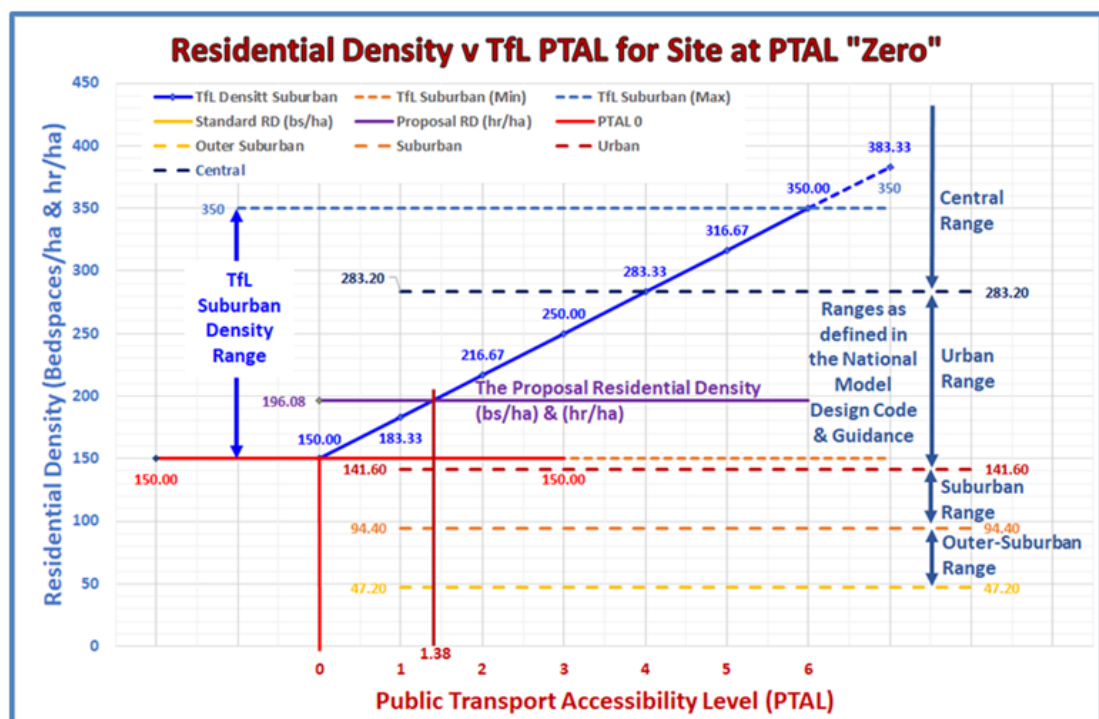
4.3.3 The assessment of **Housing Density** in the **National Model Design Code & Guidance** are “National” figures and therefore a **National**

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

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** latest average occupancy of households in the UK in 2021 at **2.36**.

4.3.4 The graphical illustration (below) clearly shows that the **TfL Density Ranges** do NOT conform to the **Area Type Ranges** defined in the **National Model Design Code & Guidance Residential Density** ranges. The **Outer Suburban** and **Suburban** ranges do not reflect the equivalent TfL designations.

4.3.5 For the **46 The Glade** proposal, the **Residential Density** in **hr/ha** and **bs/ha** equate to the same value at **196.08bs/ha or hr/ha** and are within a “**Suburban**” range when calculated based on the **TfL Accessibility Level** but are within an “**Urban**” range when assessed by the **National Model Design Code & Guidance** analysis.



Equivalent Residential Densities for each of the National Model Design Code Settings against incremental increase of PTAL

4.3.6 The TfL PTAL Range ^{Ref: 10} is **0 (Zero)** at Residential Density **150 hr/ha** through to **6** at Residential Density of **350 hr/ha**. As the Density in habitable Rooms and Persons per hectare is equal, the value is an identical line on the graphical illustration below.

4.3.7 Using this data, and TfL Connectivity data, we can plot and illustrate the required Settings for this proposed Residential Density in hr/ha and bedspaces/hectare which gives an estimated relationship between Residential Density and PTAL.

4.3.8 However, for assessment, the PTAL *required* can be calculated from the incremental linear function: $y = mx + c$

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

Thus, the Required PTAL would be:

$$\therefore 196.08 \text{ bs/ha} = \left(\frac{350 - 150}{6} \right) * x + 150 \quad \therefore x = \frac{196.08 - 150}{33.33} = 1.3825 \approx \mathbf{1.38 PTAL}$$

When the available PTAL is Zero

4.4 London Plan Policy D2 – Infrastructure Requirements for Sustainable Densities which states:

4.4.1 London Plan Policy D2 - The density of development proposals should:

- 1) consider, and be linked to, the provision of future planned levels of infrastructure rather than existing levels;
- 2) be proportionate to the site's connectivity and accessibility by walking, cycling, and public transport to jobs and services (including both PTAL and access to local services)

Where there is currently insufficient capacity of existing infrastructure to support proposed densities (including the impact of cumulative development), boroughs should work with applicants and infrastructure providers to ensure that sufficient capacity will exist at the appropriate time. This may mean that if the development is contingent on the provision of new infrastructure, including public transport services, it will be appropriate that the development is phased accordingly.

3.2.4 Minor developments will typically have incremental impacts on local infrastructure capacity. The cumulative demands on infrastructure of minor development should be addressed in boroughs' infrastructure delivery plans or programs. Therefore, it will not *normally* be necessary for minor developments to undertake infrastructure assessments or for boroughs to refuse permission to these schemes on the grounds of infrastructure capacity.

Ref: 10 <https://content.tfl.gov.uk/connectivity-assessment-guide.pdf>

- 4.4.2 As there is no possibility of **infrastructure improvement** ^{Ref:11} in the **Shirley North Ward** over the life of the Plan, it **“WILL”** be necessary for minor developments to undertake **infrastructure assessments** or for **LPAs to refuse permission on grounds of infrastructure capacity** if cumulative demands have incremental impacts on local infrastructure capacity.

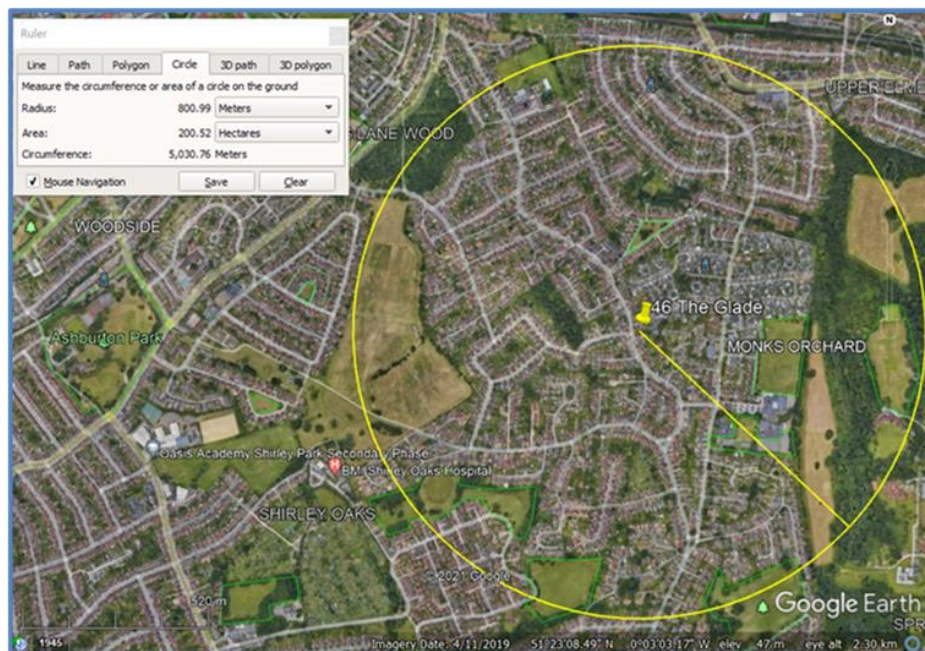
5 London Plan Policy H2 – Small Sites

5.1 London Plan Policy H2 - Small Sites para 4.2.5 States:

*“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.**”*

5.2 The new London Plan Policy H2 at para 4.2.4 states:

*“**4.2.4 Incremental intensification** of existing residential areas within **PTALs 3-6** or within **800m** distance of a **station** ^{Ref:12} or **town centre** ^{Ref:13} boundary ...”*



Google Image of 800m radius from 46 The Glade showing that it is over 800m from Tram/Train Station and District Centre; Thus inappropriate for “Incremental Intensification” London Plan Para 4.2.4.

^{Ref:11} <https://www.croydon.gov.uk/sites/default/files/2022-01/infrastructure-delivery-plan-2021.pdf>

^{Ref:12} Tube, rail, DLR or tram station.

^{Ref:13} District, major, metropolitan and international town centres.

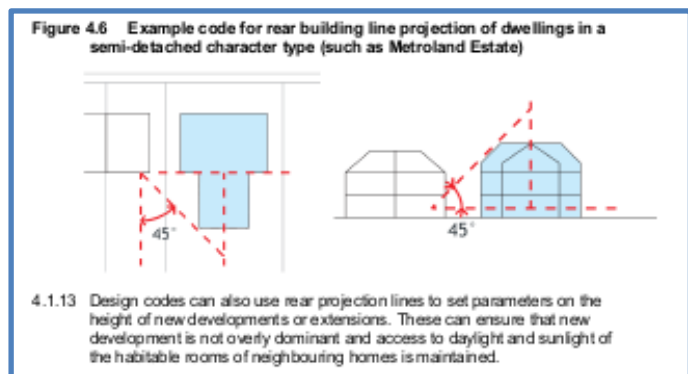
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5.2.1 **46 The Glade** has a **PTAL of Zero** and is greater than **800m** from a **Tram/Train Station** or **District Centre** and as such is inappropriate for **incremental intensification**.

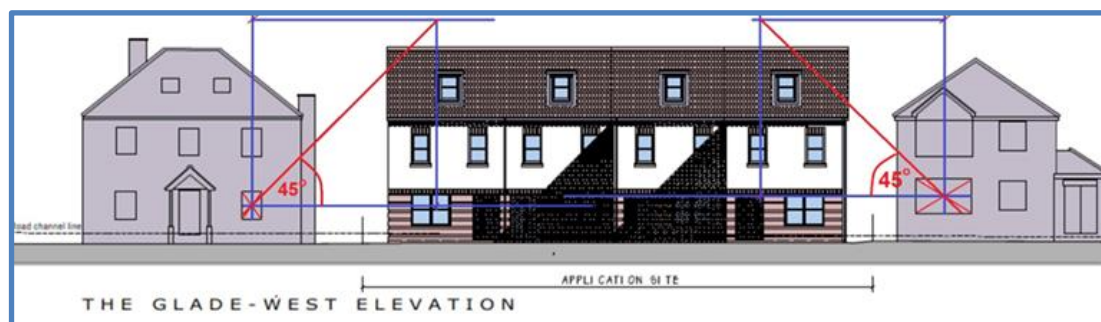
5.2.2 If the case officer is minded to recommend approval, we request **detailed 'justification'** for allowing the proposed **'intensification'** in terms of **Housing and Residential Density** for this proposal at this **Setting and PTAL Zero** in contradiction to the **London Plan Policy H2 at para 4.2.4** and the **London Plan Policy D3** and **"Design Code"** and the **Department for Levelling Up, Housing and Communities "National Model Design Code and Guidance"**

6 Privacy and Overlooking - Neighbour Amenity

6.1 It is recognised that Supplementary Planning Guidance **SPD2** has been revoked but that the **London Plan SPG Small Site Design Codes** (Feb 2022) at **Figure 4.6** prevails as an emerging policy.



6.2 The proposed **Units 1 & 4** will not meet the **45° Vertical Rule projection** from the centre of nearest ground floor window of **44 and 48 The Glade**.



West Elevation (Fronting The Glade) showing the non compliance to the 45 Degree Rule. The Applicant has NOT provided a rear elevation.

6.2.1 The proposed development fails the **45° (Vertical)** projection from both adjacent dwellings at **44 & 48 The Glade** which impacts on the Amenities of both adjacent properties and gives an overtly overbearing and dominant effect and impairs daylight and sunlight, significantly for **48 The Glade** as shielded from sun by the proposed development to the South

7 Roof Form

7.1 The proposed Gable Roof Form does not respect the Hipped Roof Forms of the adjacent and surrounding properties and also contributes to the dominant overbearing nature of the proposal.

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- 7.2 It is understood that the **Gable Roof** form allows greater capacity of the **Second-Floor accommodation** but is detrimental to the aspects of the local area and the overbearing nature of the proposal. **Hipped Roof** formations reflecting the local character, would probably overcome the **45° (Vertical) Rule** projection and alleviate the overbearing nature and amenity loss to the adjacent dwellings.

8 Parking & Accessibility

- 8.1 Both the **Croydon Local Plan** and the **London Plan** recommend **1.5 spaces per dwelling for >3 Bedroom Units at PTALs Zero and Outer London Boroughs**. This equates to a recommended quota of **6 Parking Spaces** required.

- 8.2 We have already noted a significant problem with the Parking Arrangement as listed at **Para 1.5** Above. This is further evidence that the **Site Capacity** is **insufficient** to allow all appropriate required facilities to be arranged within the perimeter of the **Site Boundary** in an acceptable arrangement for the future occupants of the proposed development.

- 8.3 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 Drawing 21031-01 does not include the complex manoeuvres of all vehicles to exit from Bay 4b if a vehicle is parked in front at bay 4a. (as raised in para 1.5 above).



- 8.4 The exit from the disabled parking Bay would require at least four manoeuvres from a previous forward parked position prior to being able to exit in a forward gear onto The Glade.

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: 14 "*

Ref: 14 Resolution 42/187 of the United Nations General Assembly

- 9.1.2 For **Sustainability**, developments require adequate **supporting infrastructure** but there is **NO planned improvement** in the provision or delivery of new improvements to the existing Infrastructure **Ref: 15** for **Shirley** over the life of the Plan.

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: 16** 2021 **Table 3.1**). This equates to **≈14 dwellings per year over 20 yrs**. 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:

- 9.2.2 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 actual 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.’)

- 9.2.3 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**.

- 9.2.4 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”***

- 9.2.5 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**.

- 9.2.6 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

Ref: 15 <https://www.croydon.gov.uk/sites/default/files/2022-01/infrastructure-delivery-plan-2021.pdf>

Ref: 16 <https://www.croydon.gov.uk/sites/default/files/2022-01/croydon-local-plan-2018-revised-2021-part-1-start-to-section-11.pdf>

the Target for the Shirley “Place” of 278 by 442 Dwellings i.e., for the ‘Whole’ of the Shirley “Place”.

9.2.7 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**. Over the Full Four Years the estimate outturn is **1257 dwellings** (see completions analysis table below).

9.2.8 This is $|278 - 1257.5|/278 = 979.5/278 = 3.5234 = \mathbf{352.34\%}$ Increase for the Shirley “Place” estimate when the MORA Area is only $(770-178.2)/178.2 = \mathbf{23.15\%}$ of the area of the estimated Shirley ‘Place’ and $(178.26-715.2/715.2) = \mathbf{24.92\%}$ 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 1a 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 31st Jan 2022.

9.2.9 This current rate (if retained) would exceed the Target over 20 yrs. (of 278) at 1257.5 by: **Percentage of Increase** of $|128 - 1257.5|/128 = 1129.5/128 = 8.8242 = \mathbf{882.42\%}$. or a **Percentage Difference** of 128 and 1257.5 = $|128 - 1257.5|/((128 + 1257.5)/2) = 1129.5/692.75 = 1.63 = \mathbf{163\%}$.

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 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**

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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**).

- 9.2.11 This rate (if retained) would result in the number of developments **significantly exceeding** the available **supporting infrastructure** provision which has been acknowledged as unlikely to be improved over the life of the Plan.

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

- 9.2.12 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.**
- 9.2.13 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** as defined in the **NPPF Chapter 2. Achieving sustainable development** **Ref: 17** as Shirley has no prospect of infrastructure improvement over the life of the Plan. The **Sustainability of Developments** is a **legal requirement** **Ref: 18** of development approvals.
- 9.2.14 We challenge the use of **“Place”** Target if those **Targets** for each **“Place”** are **NOT monitored** or if deviating from the requirement, there is no mitigating action to manage those Targets to meet **“Sustainable Developments”**. It is our understanding that **Managing Developments** is the prime responsibility and the Job Description of the LPA **“Development Management”**. **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, and there are NO infrastructure improvements to support the surpassing of that “Need.”**

10 Summary

- 10.1 The proposed development would introduce a substantial Block of 4 Terraced Units of 3-4 storey with gable roofs on this plot. There would be a pronounced increase in height from the neighbouring two-storey properties. The height and bulk would be significantly greater than the rest in the locality and therefore would be visually jarring

Ref: 17

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

Ref: 18 <https://www.legislation.gov.uk/ukpga/2004/5/section/39>

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in this context. The proposed development would therefore harmfully contrast with the limited height and scale of surrounding properties in this area and therefore unacceptably erode its modest character.

- 10.2 Policy DM10 of the Croydon Local Plan 2018 (CLP) states that proposals should seek to achieve a minimum height of 3 storeys, but also that they should respect the development pattern, scale, height and massing of the surrounding area amongst other things. This development seeks to increase the density on this site. However, as outlined above, it would be in a form that would be harmful to the character and appearance of the area. Therefore, it would be contrary to these policies in this regard.
- 10.3 Consequently, the proposed development would result in a harmful effect on the character and appearance of the area. As such, in this respect, it would be contrary to Policies SP4 and DM10 of the CLP. Together these seek to achieve high quality design which respects local character.

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 We again reiterate, if the **Case Officer disagrees** with any of the above assessments or analysis in any respect or additionally for the assessment of **“Gentle” *Densification***, we respectfully request that the **Case Officer’s Report** to officers or Committee Members, provides an explanation of the **professional appraisal** of the **Area Type Setting, Site Capacity Assessment**, and the professional definition of **“Gentle *Densification*”** fully supported by 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**.
- 11.3 Local Residents have **“lost confidence in the Planning Process”** resultant on recent local **over-developments** and lack of additional supporting infrastructure, 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**.
- 11.4 We urge the **LPA to refuse this application** and request the applicant to submit a revised proposal meeting the defined **National Model Design Code and Guidance** as published by the **Department for Levelling Up, Housing & Communities** (January & June 2021) **Build form Policies** for an **“Outer Suburban” Area Type Setting** as, from all assessment of the locality, the Shirley Wards (Both Shirley North & Shirley South Wards) are in every

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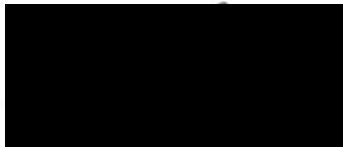


assessment either less than or equal to the Housing Density for an **Outer Suburban** Area Type Setting.

- 11.5 Please Register this representation as **Monks Orchard Residents' Association (Objects)** on the Public Access Register.

Kind regards

Derek



Derek C. Ritson I. Eng. M.I.E.T.

MORA – Planning

Email: planning@mo-ra.co

Cc:

Sarah Jones MP

Cllr. Sue Bennett

Cllr. Gareth Streeter

Cllr. Richard Chatterjee

Croydon Central

Shirley North Ward

Shirley North Ward

Shirley North Ward

Bcc:

MORA Executive Committee, Local affected Residents & Interested Parties