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**Monks Orchard
Residents' Association
Planning**

9th November 2022

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Reference:	22/04197/FUL
Application Received	Mon 10 Oct 2022
Application Validated	Mon 10 Oct 2022
Address	179 The Glade Croydon CR0 7UL
Proposal	Change of use from single residential dwellinghouse (C3) to HMO (C4)
Status	Awaiting decision
Consultation Expiry:	Sat 12 Nov 2022
Determination:	Mon 05 Dec 2022
Case Officer:	Christopher Grace

Dear Mr Grace,

We understand the need for low-cost rental accommodation and therefore are hesitant to object to this proposal. However, there are a number of issues which we believe are important and deserve consideration before making a determination. HMO accommodation requires to be acceptable to both occupants, neighbours and local residents.

Please accept our comment on the above proposal for conversion of the single residential dwelling bungalow Type C3 to a house of Multiple Occupation Type C4.

1 Initial Observations:

- 1.1 There is insufficient provided documentation for this application which fails to meet the validation checklist requirements or the objectives of validation to provide adequate information to fully assess the proposal.
- a) There is no Design and Access Statement (Reference Note “8” **Ref:1** indicates “where appropriate” but I cannot find any definition of what dwelling types or applications for which this requirement would **not** be appropriate).
 - b) It is not clear how many bed spaces are to be provided. We have assumed capacity assessed by the floor area of each bedroom against the London Plan Guidance – Housing Design Standards bedroom sizes with the requirement progression extrapolated to cover the estimated number of bedspaces.

Ref:1 This is another example of a vague subjective requirement which is meaningless unless defined.

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- c) There are no statements or plans for Car Parking provision or Parking capacity for occupants. The Application Form indicates 4 Spaces exist; proposed Spaces retained (Zero). Therefore, there is no specified on-site Parking provision for any occupants of the proposed conversion to HMO (C4) usage. (See Parking at Section 5 below).
- d) There is no indication of provision of Storage Space for any occupants as required of the London Plan Policy D6 Table 3.1 and London Plan Guidance – Housing Design Standards (Best Practice).
- e) There is no indication of Refuse or cycle storage as required of London Plan Policy T5 or Guidance (LPG) – Housing Design Standards.
- f) The London Plan Housing Design Standards requires two or more WCs for all dwellings with five or more Bedspaces. The proposal meets this requirement but one is presumed within the bathroom shared by all occupants.
- g) The Application Form at “Description of Proposal” requests:
 - i) Has the Works or Change of Use already Started? Answer Yes.
 - ii) Has the Work or Change of Use been completed? Answer Yes.

Therefore, should this application be for “Retrospective” Planning Application rather than for Planning permission, or is it Change of Use with NO structural alterations which is already occupied by tenants and as such is already an HMO.
- h) There is only one Bathroom shared between possibly nine persons and possibly 5 persons, who are unrelated to each other, if the double bedroom occupants are assumed related. This arrangement does not seem acceptable. This is likely to be inadequate for the probable number of occupants.
- i) Two WCs are provided, but one is in the bathroom so unavailable if someone is in the Bathroom for washing.

1.2 The Application Form indicates the Site Area at **145sq.m.** whereas the actual **Site Area** is **≈507.42sq.m. ≈ 0.050742ha** as measured on Google Earth.

1.3 Croydon Plan Policy DM10.1 States:

1.3.1 *“Where a conversion or house in Multiple Occupation is proposed, the Council will also consider the effects of “noise”, “Refuse Collection” and additional Car Parking on the character of an area. For this Reason, the Council will seek proposals to incorporate parking within the rear, to the side or underneath building.*

1.3.2 There are no proposals, mitigation or otherwise in the proposed documentation provided, to meet these requirements.

1.3.3 Para **6.58** refers to the recycling of existing plots with denser forms of development Without Significant impact on character by;

- a) *Conversion – The conversion or subdivision of large buildings into multiple dwellings without major alteration to the size of the building.*

2 Proposal's Parameters

Application Details			
Application Ref:	22/04917/FUL		
Address	179 The Glade		
PostCode	CR0 7UL		
Consultation Close	12/11/22		
Parameters			
Site Area (ha)	0.050742		
Site Area (sq.m.)	507.42		
Units (Dwellings)	1.00		
Bedrooms	5.00		
Bedspaces	9.00		
Habitable Rooms	6.00		
Housing Density	19.71	Units/ha	
Residential Density	177.37	bs/ha	
Residential Density	118.25	hr/ha	
		Min	Max
Area Type Setting (Units/ha)	<Outer Suburban	0.00	20.00
Area Type Setting (Bedspaces/ha)	<Outer Suburban	0.00	47.20
		U/ha	bs/ha
PTAL (Current)	1.33	4.43	10.46
PTAL (Forecast)	1.33	4.43	10.46
Gentle Intensification	<Outer Suburban	6.67	15.73
Moderate Intensification	<Outer Suburban	13.33	31.47
Focussed Intensification	<Outer Suburban	20.00	47.20

3 Densities

3.1 National Model Design Code & Guidance

- 3.1.1 The **National Model Design Code & Guidance** Area Types are stated as "Outer Suburban" 20 to 40 Units/ha, "Suburban" 40 to 60 Units/ha, Urban 60 to 120 Units/ha and Central 120 Units/ha & above only limited by Regulation Internal Spaces Standards. However, this proposal has Site Area of **507.42sq.m. = 0.050742ha** which equates to a Housing Density of **19.71Units/ha** which is **less than** the "**Outer Suburban**" minimum. i.e., **<Outer Suburban** Range between **Zero** and **20 Units/ha** or **Zero** and **47.20 bs/ha**.

3.2 Housing Density

- 3.2.1 The Housing Density is unchanged at one Unit on a Site Area of **507.42sq.m. = 0.050742ha**. at **19.71Units/ha**. This is **NOT** as stated on the Application Form i.e., 145 sq.m. = 0.0145ha = **68.97Units/ha**.

3.3 Residential Density

- 3.3.1 The number of occupants for this Application are undefined in the proposal documentation (as far as we can determine).
- 3.3.2 The only method of determining number of occupants is by assessing the acceptability of Bedroom sizes to the recommended capacity.
- 3.3.3 The floor plans list the areas of each bedroom and therefore it is possible to establish the occupant capacity from the available floor space as given in the London Plan Guidance (LPG) – Housing Design Standards.

Bedroom sizes:

6.51 m² for one person over 10 years of age

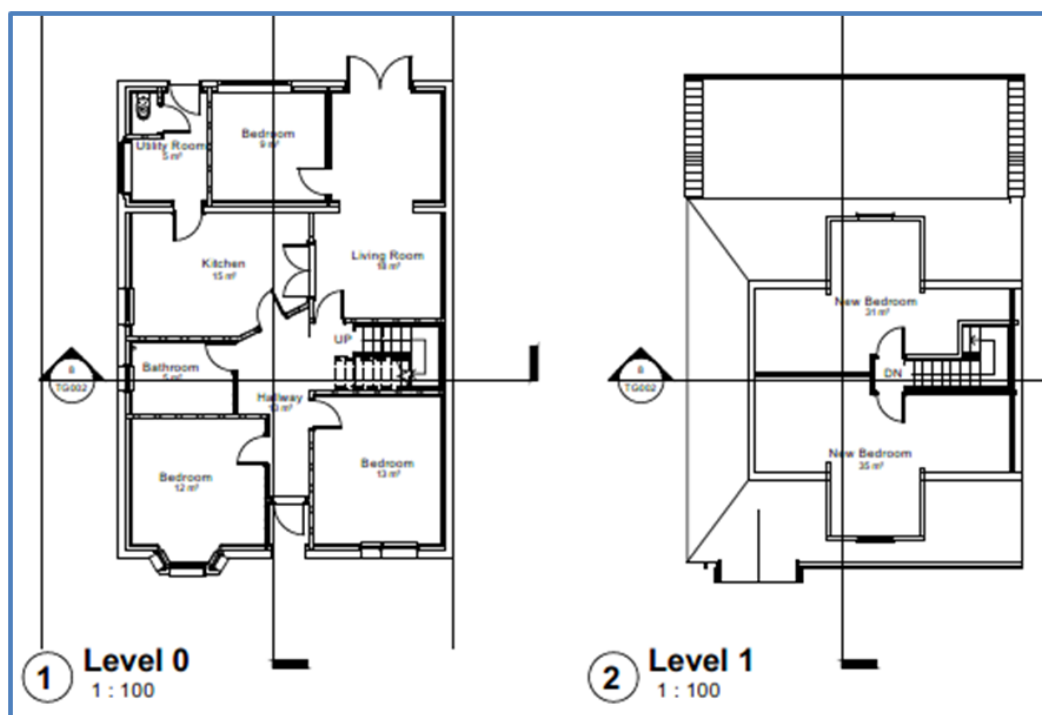
10.22 m² for two persons over 10 years

4.64 m² for one child under the age of 10 years

Any room of less than 4.64 m² may not be used as sleeping accommodation.

3.3.4 London Plan Policy D6 Housing quality and standards

- a) A dwelling with two or more bedspaces must have at least one double (or twin) bedroom that is at least 2.75m wide. Every other additional double (or twin) bedroom must be at least 2.55m wide.
- b) A one bedspace single bedroom must have a floor area of at least **7.5 sq.m.** and be at least **2.15m** wide.
- c) A two bedspace double (or twin) bedroom must have a floor area of at least **11.5 sq.m.**



Floor Plans for proposed HMO Application showing 5 Bedrooms

3.3.5 Therefore Bed 1 at **9 sq.m.** accommodates a **single** bed, but the remaining four bedrooms are all greater than **11.5sq.m.** and could accommodate **two single beds** or **one double bed** which in total provides an **Occupancy of 9 persons**. This provides a **Residential Density** of $9/0.050742 = 177.37 \text{ bedspaces/ha}$ (Not $9/0.0145 = 620.69 \text{ bedspaces/ha}$ as defined by the applicant's **Application Form Site Area of 145sq.m.**

3.3.6 If measured by **Habitable Rooms per hectare**, there are **6 habitable** rooms therefore the Residential Density would be $6/0.050742 = 118.25\text{hr/ha}$. However, the **Habitable Rooms per hectare (hr/ha)** Density is an inappropriate parameter as habitable rooms do not require supporting infrastructure or any other requirement, and as such is an *irrelevant* parameter.

3.4 Living/Kitchen/Dining Space requirement

3.4.1 The **London Plan Guidance (LPG) – Housing Design Standards** at Section **C2.4 Policy D6** provides floor space capacity requirements to be met or exceeded for incremental increase in occupants from **1 person** incrementally for each additional person starting at **21sq.m.** and increasing by **2 sq.m.** for every additional person.

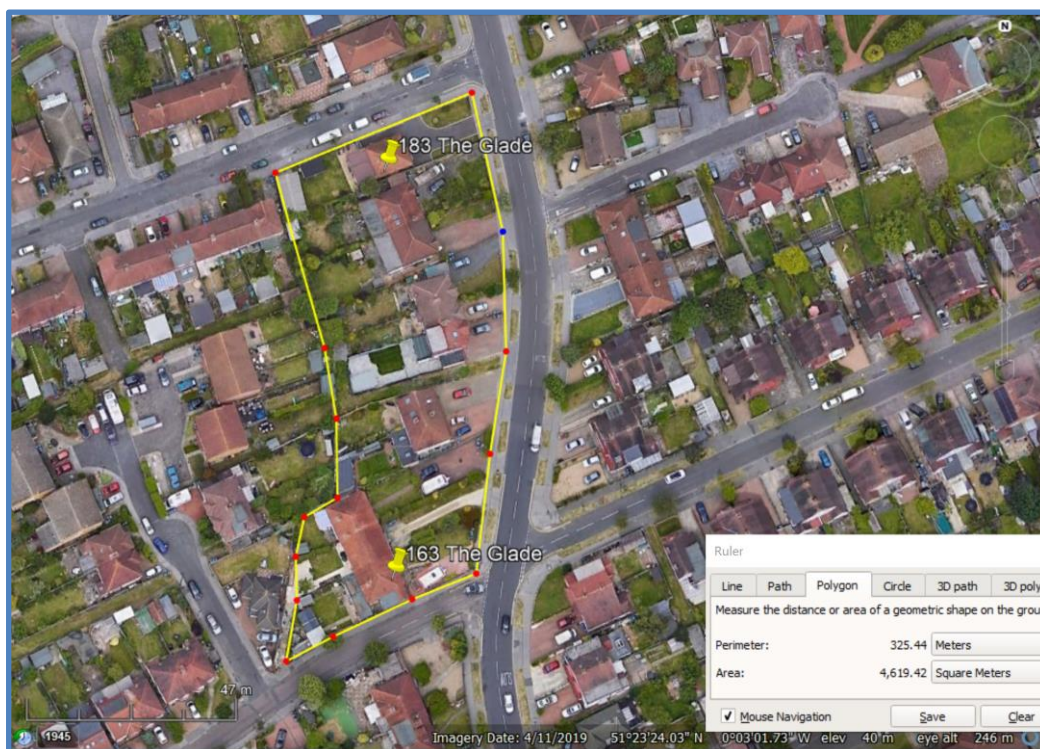
3.4.2 Thus, for an **HMO** with occupancy of **nine (9) persons**, the combined **Living/Kitchen/Dining** space should be equal or greater than $21 + (2 \times 8) = \mathbf{37sq.m.}$ when the proposal offers Living & Kitchen = $15 + 18 = \mathbf{33 sq.m.}$ A deficiency of **4 sq.m.**

4 Local Design Code

4.1 The local Area Type Setting requires a defined area for assessment and the most obvious local area is the **Post Code** of the locality at **CR0 7UL**.

4.2 The Post Code Area **CR0 7UL** extends from **163 to 183 (odds) The Glade** ^{Ref:2} (11 Units) and has **23 Occupants** ^{Ref:3} in an Area of **4619.42 sq.m.** (Google Earth). I have developed a simple excel interactive spreadsheet which provides an automatic assessment of **Post Code Design Code parameters** on the input of the basic **Post Code** information. (See screen grab below). All 'Blue' cells are auto calculated from the basic input data of the Post Code.

4.3 **Post Code CR0 7UL embraces the area from 163 to 183 the Glade.**



Google Earth Image covering Post Code Area CR0 7UL

^{Ref:2} <https://www.gov.uk/government/organisations/valuation-office-agency>

^{Ref:3} <https://www.postcodearea.co.uk/>

- 4.4 The output from the interactive spreadsheet after inputting the **Post Code** Parameters indicate that the **Post Code CR0 7UL** Area Type Setting to be **“Outer-Suburban”** as defined by the **National Model Design Code & Guidance**. The location is not included for **“Moderate”** or **“Focussed”** Intensification on the **‘Policies Map’** and therefore the allowable evolutionary growth is defined in the **Croydon Local Plan** as **“Gentle”** **Densification** which we estimate to be appropriately **26.67Units/ha** or **62.93 bedspaces/ha** for the **Post Code Area** to ensure **infrastructure support** and **sustainability**.

Parameters of Post Code Design Code				
Area Design Code Parameter (These parameters auto calc Design Code)		Input Parameters		Constrains
Post Code		CR0 7UL		Ward Shirley North
Area of Post Code (ha)		0.461942	hectares	Flood Risks 100yr Surface
Area of Post Code (Sq.m)		4619.42	sq.m.	Gas Pressure Low Pressure
Number of Dwellings (Units)		11	Units	Water Pressure N/A
Number of Occupants (Persons)		23	Persons	HASL (m) 39m
Post Code Housing Density		23.81	Units/ha	Building Line Set-Back 7m to 14m
Post Code Residential Density		49.79	Bedspaces/ha	
Area Type (National Model Design Code)		Outer Suburban	Setting	
Design Code Parameters		Min	Max	Measure
Area Type (Outer Suburban, Suburban or Urban)		Outer Suburban	20 40	Units/ha Range
Equivalent Residential Density (Persons/ha)		Outer Suburban	47.20 94.40	Persons/ha Range
		U/ha	bs/ha	
Gentle Densification (Limits in U/ha & bedspaces/ha)		26.67	62.93	Limits Densification
Moderate Intensification (Limits in U/ha & bedspaces/ha)		33.33	78.67	Limits Intensification
Focussed Intensification (Limits in U/ha & bedspaces/ha)		40.00	94.40	Limits Intensification
PTAL (now)		1.33	24.43 57.66	Limits for PTAL
PTAL (forecast 2031)		1.33	24.43 57.66	Limits for PTAL

Design Code Interactive Spreadsheet (Screen grab) for Post Code CR0 7UL
Interactive Excel Spreadsheet (Screen Grab) for Post Code CR0 7UL Design Code

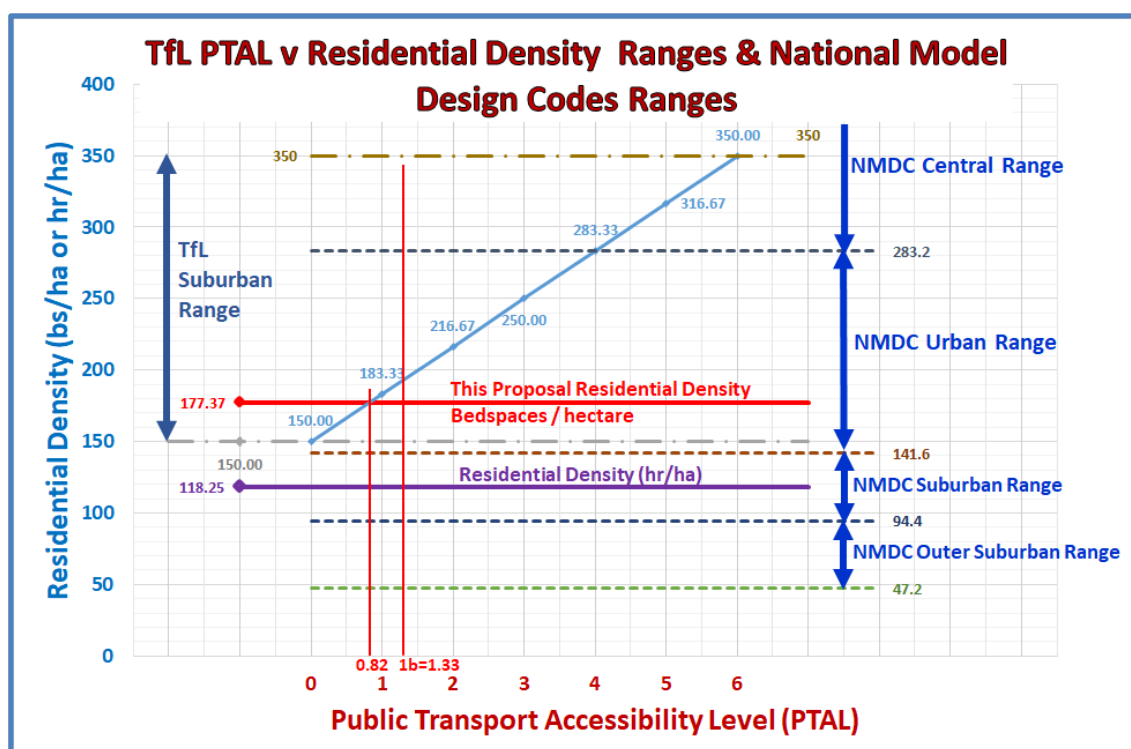
- 4.5 As the Locality has **PTAL 1b**, which is assumed numerically equivalent to **1.33** for assessment purposes and is forecast to remain at **1b** up to 2031, the appropriate **Residential Density** appropriate for **PTAL 1b** \equiv **1.33** is calculated as **24.43Units/ha** or **57.66bedspaces/ha** for the **Post Code Area Design Code** which confirms the appropriate incremental increase within the **“Outer Suburban”** **Area Type Setting**.

5 Actual Residential Density and Supporting PTAL at 1b \equiv 1.33

5.1 TfL Density Ranges & PTAL compared to National Model Design Code Densities

- 5.1.1 Assuming the **TfL** distribution of **PTAL** across the ranges of **Suburban** are linear from minimum to maximum, the range for **Suburban** is **150 to 350 hr/ha**. The graphical illustration (below) at Site Area of **0.0507ha** and occupancy of **9 persons** equates to a **Residential Density** of the proposal at **118.25hr/ha** & **177.37 Bedspaces/ha**. The actual Residential Density at **118.25hr/ha** is meaningless in this context assessment as **Habitable Rooms** do not require **Public Transport Accessibility** or other requirement in any form and as such is thus irrelevant.
- 5.1.2 The following Graphical illustration of parameters clearly show that the **Residential Densities** for the Transport for London (**TfL**) are different to those assessed by the **National Model Design Code** for **Outer Suburban**, **Suburban** and **Urban**. Nevertheless, these are the parameter definitions to which we have to assess. It would be helpful if the professional planning fraternity established common fundamental parameters definitions.

- 5.1.3 As the **National Model Design Code** Guidance is based upon **National values**, we can convert the **Housing Density** to **Residential** occupancy based upon the 'National' figure for Unit Occupancy as defined by the NOS or Statista. **Ref:4** The conversion factor is **2.36 persons per Unit** (2021).
- 5.1.4 The Residential Densities in the Graphical Illustration below for the Area Type Setting ranges, have been converted using this factor.



The Graphical illustration of Residential Density of 117.37 Bedspaces/ha (for occupancy of 9 Persons) & 118.25hr/ha at Site Area of 507.42ha and PTAL of 1b=1.33 for TfL and National Model Design Code Area Types.

- 5.1.4 The Residential Density at **177.37Bedspaces/ha** falls within the **National Model Design Code** Residential Density for an "**Urban**" Area Type Setting Range (i.e., 141.6 to 283.2 bs/ha) which significantly exceeds the Area Type defined by the **National Model Design Code & Guidance** for the Area Type Setting, when the locality is defined by the Post Code Area CR0 7UL to be "**Outer- Suburban**".
- 5.1.5 The TfL Area Type does not recognise an "**Outer Suburban**" Area Type but starts at "**Suburban**" and is measured in terms of 150 to 350 hr/ha. The **Residential Density** for this proposal as measured is **118.25hr/ha** which is below the TfL range of 150 to 350 hr/ha. i.e., below Suburban but within the **National Model Design Code Area Type** of "**Suburban**", when the Locality is actually "**Outer Suburban**".
- 5.1.6 For a **Residential Density** of **177.37bedspaces/ha**, the required **PTAL** based on the TfL Density Ranges would be:

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

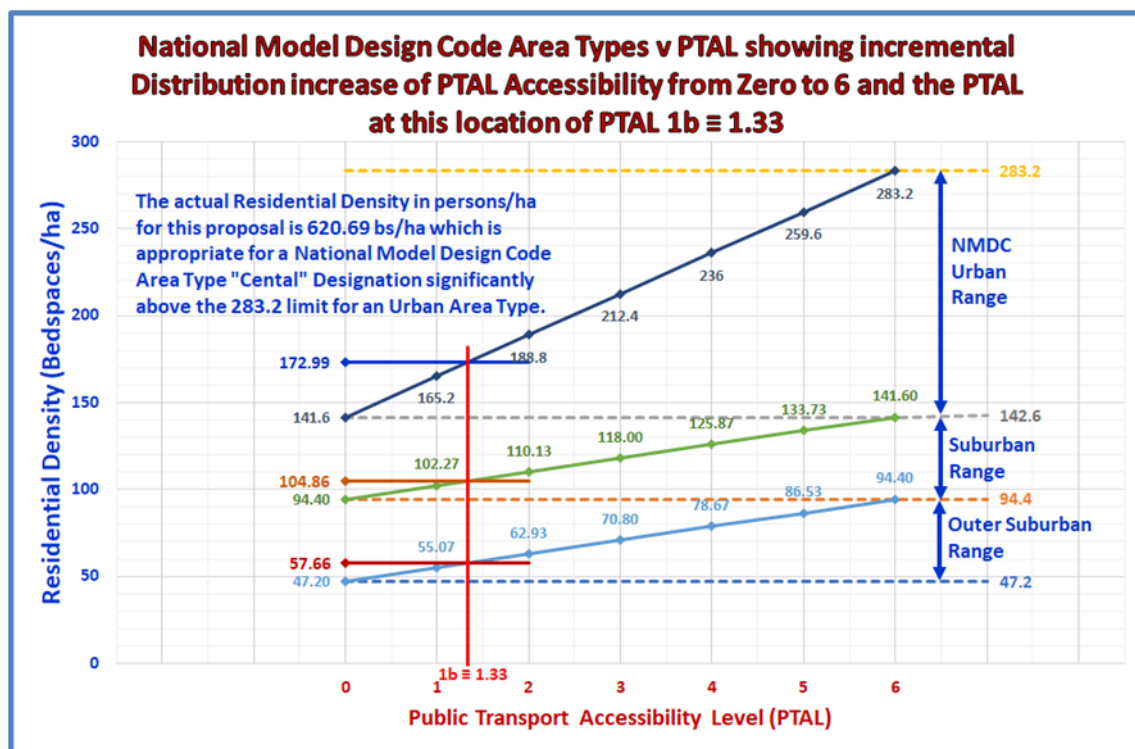
$$177.37 = \left(\frac{350-150}{6} \right) * x + 150 \text{ where } x = PTAL \therefore x = \left(\frac{177.37-150}{33.33} \right) = 0.82 = PTAL$$

- 5.1.7 This Residential Density of 177.37bs/ha is acceptable for a PTAL of 1b for a TfL “Suburban Setting”, or a National Model Design Code “Urban” Area Type Setting but the National Model Design Code Guidance defines 179 The Glade as an “Outer Suburban” Area Type Setting.

5.2 National Model Design Code Assessment for Public Transport Accessibility

- 5.2.1 A more proportionate evaluation and assessment of suitable Public Transport Accessibility (PTAL) appropriate for Design Code Area Type Settings is based upon the presumption that the lower level of PTAL would expect a lower level of Density and a Higher Level of PTAL would support a high level of Density. Therefore, the incremental increase in Density would be *proportionate* to an incremental increase in PTAL over and within the Area Type Ranges.

- 5.2.2 As each Area Type Setting has its level of supporting infrastructure within the range, the lowest level of supporting infrastructure would require the lowest level of density proportionately as the supporting infrastructure is increased. The increase in PTAL support can be represented by a linear progression from Zero PTAL to PTAL 6 over the Area Type Range.



Graphical Illustration of linear incremental increase in PTAL for each Area Type Setting as defined by the Nation Model Design Code

- 5.2.3 The Level of PTAL at 179 The Glade is 1b, numerically \equiv 1.33 and therefore as the Area Type Setting is <Outer Suburban, the range is 0 to 20 Units/ha or 0 to 47.2 Persons/ha. Therefore, an appropriate Residential Density at PTAL = 1.33 in an <Outer Suburban Area Type Setting would be:

$$\text{Residential Density bs/ha} = \left(\frac{47.2-0}{6} \right) * 1.33 + 0 = 7.8666 * 1.33 = 10.46 \text{ bs/ha}$$

For Outer Suburban

Residential Density $bs/ha = \left(\frac{94.4-47.2}{6}\right) * 1.33 + 47.2 = 7.8666 * 1.33 + 47.2 = 57.66$

Whereas the proposal has a Residential Density of **177.37 bs/ha** or persons/ha.

This is a:

Percentage Difference of 57.66 and 177.37 = $|57.66 - 177.37| / ((57.66 + 177.37)/2) = 119.71/117.515 = 1.018 = 101.8\%$

Percentage Increase of = $|57.66 - 177.37| / 57.66 = 119.71/57.66 = 2.076 = 207.61\%$

6 Car Parking

6.1 The accommodation at 179 The Glade converted to C4 HMO would support up to 9 individuals each possibly owning a car. The Application Form indicates 4 Spaces exist but proposed Spaces retained (Zero). Therefore, there is no specified on-site Parking provision for any of the proposed occupants, on conversion to HMO (C4) usage.

6.2 London Plan Policy T6.1 – Residential Parking at “E” States:

E Large-scale purpose-built shared living, student accommodation and other *sui generis* residential users should be car-free.

6.3 Croydon Local Plan (Revised) – Policy DM10.1

Where a conversion or house in multiple occupation is proposed the Council will also consider the effects of noise, refuse collection and additional car parking on the character of an area. For this reason, the Council will seek proposals to incorporate parking within the rear, to the side or underneath building.

6.4 Therefore, the availability of parking for the future occupants of HMO's (C4) Type dwellings are indeterminate, which could possibly mean parking overspill into surrounding streets.

7 Summary & Conclusions

7.1 Article 4 Direction

7.1.1 Croydon Council introduced an Article 4 Direction on 28 January 2020 to protect family homes (houses and flats) by requiring planning permission to convert these properties into small houses of multiple occupation (HMOs). The Article 4 Direction was confirmed to come into place on 28 January 2020, a year after it was first made.

The Article 4 Direction applies to the whole borough.

7.1.2 The Article 4 Direction Schedule:

“Development consisting of a change of use of a building and any land within its curtilage from a use falling within Class (C3) (Dwellinghouses) of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended) to a use falling within Class C4 (Houses in multiple occupation) of that Schedule, being development comprised within Class L(b) of Part 3 of Schedule 2 to the GDPO and not being development comprised within any other Class.”

7.2 It is recognised that conversion of dwellings (C3) to a House of Multiple Occupation (C4) provides much needed accommodation for youngsters starting out in their working lives.

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These conversions are therefore a source of housing supply which can help to fill that need. However, there are policies to ensure the accommodation is suitable which we have tried to adequately capture in our submission to assist the assessment by the Case Officer.

- 7.3 There is also a critical balance required when assessing a proposal for conversion of family dwellings from C3 to C4 HMO usage on the affects and relationship with adjoining neighbours and the locality generally, to ensure continued neighbourly cohesion to ensure the neighbourhood does not degenerate toward deprivation.
- 7.4 Resulting on our detailed assessment, we therefore, hold the view that this proposal is a loss of a family dwelling and as a result of an assumed occupancy of 9 persons (bedspaces), provides inadequate facilities for the possible number of future occupants and therefore the proposal as offered should be refused.
- 7.5 Please publish our objection on the Public Access Register as **Monks Orchard Residents' Association (Objects)**.

Kind regards

Derek



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

Cc:

Cllr. Sue Bennett
Cllr. Richard Chatterjee
Cllr. Mark Johnson

Shirley North Ward
Shirley North Ward
Shirley North Ward

Bcc:

MORA Executive Committee, Local affected Residents & Interested Parties