

Area Type Settings, Design Code Guidance.

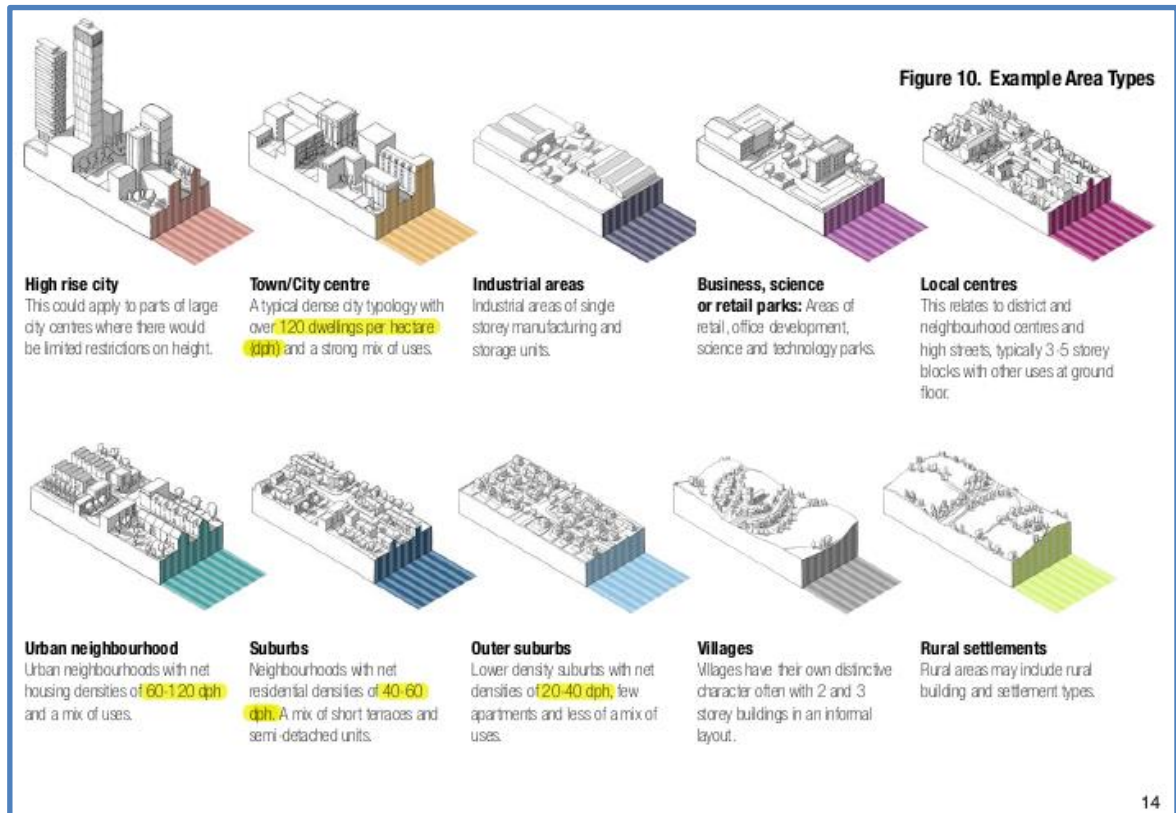
This discussion paper assesses the Fundamental Parameters to determine 'Area Type' Settings for 'Local' assessment and analysis of proposed developments.

1 Area Type Settings.

1.1 National Model Design Code - Part 1 Code Guidance (Coding Plan Fig 10 Page 14) sets out the Housing Densities for the various Area Type Settings.

1.2. The Area Type Settings as defined in the National Model Design Code & Guidance are:

- a) **Rural Settlements** very dispersed dwellings within a rural environment.
- b) **Village (rural)** dispersed clusters of dwellings of low densities on large site areas <20 U/ha.
- c) **Outer Suburban** – Design Code Housing Density **20 to 40 Units/ha**
- d) **Suburban** - Design Code Housing Density **40 to 60 Units/ha**
- e) **Urban** - Design Code Housing Density **60 to 120 Units/ha**
- f) **Town/City Centre** - Design Code Housing Density **>120 Units/ha**
- g) **High Rise Central** – Height limits, high-rise high density per hectare units, limited by requirement to meet Internal Spaces Standards (London Plan Table 3.1).



These illustrations, extracted from the National Model Design Code, Part 1, show the 'explicit definitive' Housing Densities for the various Settings (Highlighted).

2 National Guidance applied to Croydon and Local Areas

- 2.1 The following table lists the assessment of the **London Borough of Croydon** and the **28 Wards**, Area Type Settings, based upon the **National Model Design Code & Guidance**.
- 2.2 The **National Model Design Code**, Part 1, Section 2B Coding gives the **Area Type Settings** for “**Outer Suburban**” or “**Outer (London) Suburban**”, “**Suburban**”, “**Urban**” and “**Central**”. The Designated Areas number of **Units** for the **Local Design Code**¹ have been based on the Census/Estimates for 2021 at National Occupancy² rates.

Location	Area (ha)	Population	Dwellings (Units) (Nat Avg)	Residential Density (bs/ha) (Nat Avg)	Housing Density (Units/ha)	"Setting" for Design Code Residential Density (bs/ha)	"Setting" for Design Code Housing Density (U/ha)
Croydon	8,652.00	390,719	165,559	45.16	19.14	<Outer Suburban	<Outer Suburban
Ward							
Addiscombe East	148.40	11,460	4,856	77.22	32.72	Outer Suburban	Outer Suburban
Addiscombe West	137.50	16,212	6,869	117.91	49.96	Suburban	Suburban
Bensham Manor	144.60	16,932	7,175	117.10	49.62	Suburban	Suburban
Broard Green	217.20	20,221	8,568	93.10	39.45	Outer Suburban	Outer Suburban
Coulsdon Town	484.50	15,425	6,536	31.84	13.49	<Outer Suburban	<Outer Suburban
Crystal Palace & Upper Norwood	263.40	16,347	6,927	62.06	26.30	Outer Suburban	Outer Suburban
Fairfield	146.00	15,354	6,506	105.16	44.56	Suburban	Suburban
Kenley	552.50	10,984	4,654	19.88	8.42	<Outer Suburban	<Outer Suburban
New Addington North	136.50	10,946	4,638	80.19	33.98	Outer Suburban	Outer Suburban
New Addington South	254.90	11,322	4,797	44.42	18.82	<Outer Suburban	<Outer Suburban
Norbury Park	222.80	10,825	4,587	48.59	20.59	Outer Suburban	Outer Suburban
Norbury & Pollards Hill	130.80	12,133	5,141	92.76	39.31	Outer Suburban	Outer Suburban
Old Coulsdon	673.90	10,115	4,286	15.01	6.36	<Outer Suburban	<Outer Suburban
Park Hill & Whitgift	206.60	5,783	2,450	27.99	11.86	<Outer Suburban	<Outer Suburban
Purley Oaks & Riddlesdowne	270.30	9,713	4,116	35.93	15.23	<Outer Suburban	<Outer Suburban
Purley & Woodcote	461.70	15,190	6,436	32.90	13.94	<Outer Suburban	<Outer Suburban
Sanderstead	711.60	15,767	6,681	22.16	9.39	<Outer Suburban	<Outer Suburban
Selhurst	149.80	13,184	5,586	88.01	37.29	Outer Suburban	Outer Suburban
Selsdon & Addington Village	602.00	9,925	4,206	16.49	6.99	<Outer Suburban	<Outer Suburban
Selsdon Vale & Forestdale	526.90	10,017	4,244	19.01	8.06	<Outer Suburban	<Outer Suburban
Shirley North	328.00	15,406	6,528	46.97	19.90	<Outer Suburban	<Outer Suburban
Shirley South	384.40	10,619	4,500	27.62	11.71	<Outer Suburban	<Outer Suburban
South Croydon	384.40	18,053	7,650	46.96	19.90	<Outer Suburban	<Outer Suburban
South Norwood	197.80	16,438	6,965	83.10	35.21	Outer Suburban	Outer Suburban
Thornton Heath	171.70	18,008	7,631	104.88	44.44	Suburban	Suburban
Waddon	339.90	18,687	7,918	54.98	23.30	Outer Suburban	Outer Suburban
West Thornton	197.60	18,768	7,953	94.98	40.25	Suburban	Suburban
Woodside	215.30	16,881	7,153	78.41	33.22	Outer Suburban	Outer Suburban
Average	309.32	13,954	5,913	60.20	25.51	Outer Suburban	Outer Suburban

The above Table shows the Area Type Settings for Croydon and the 28 Wards of Croydon³ as defined by the National Model Design Code & Guidance.

- 2.3 The Area Type Settings - can be based upon the following localities Area Types: (the smaller the Area, the greater the accuracy of the Area Type Setting)
- London Borough of Croydon
 - Croydon Wards:
 - Post Code (CR0 N) - N=Numerical
 - Post Code Group (CR0 NA) - N=Numerical. A= Alpha
 - Post Code Area (CR0 NAA) - N=Numerical. A= Alpha
 - Estates, Areas of common build form, architectural or period of build.

¹ <https://www.citypopulation.de/en/uk/greaterlondon/>

² <https://www.statista.com/statistics/295551/average-household-size-in-the-uk/>

³ <https://www.citypopulation.de/en/uk/london/wards/> 2021Census/Estimates

2.4 The following Table provides examples of the **Shirley Wards** (Shirley North & Shirley South) and recent assessments of **Post Code Assessments** and **Area Type Settings**.

Location	Area (ha)	Population (Est Area)	Dwellings (Units) (Est Area)	Residential Density (bs/ha)	Housing Density (Units/ha)	"Setting" for Design Code Residential Density (bs/ha)	"Setting" for Design Code Housing Density (U/ha)	Occupancy Ratio (Est Area 2.36)
Shirley North	328.00	15,406	6,528	46.97	19.90	<Outer Suburban	<Outer Suburban	2.36
Shirley South	384.40	10,619	4,500	27.62	11.71	<Outer Suburban	<Outer Suburban	2.36
All Shirley	712.40	26,025	11,028	36.53	15.48	<Outer Suburban	<Outer Suburban	2.36
MORA Area	178.26	9,166	3,884	51.42	21.79	Outer Suburban	Outer Suburban	2.36
Post Code CR0 8S(*)	16.95	627	237	36.99	13.98	<Outer Suburban	<Outer Suburban	2.65
Post Code CR0 8T(*)	11.82	644	246	54.48	20.81	Outer Suburban	Outer Suburban	2.62
Post Code CR0 7PL	1.73	47	19	27.17	10.98	<Outer Suburban	<Outer Suburban	2.47
Post Code CR0 7QD	1.51	68	28	45.03	18.54	<Outer Suburban	<Outer Suburban	2.43
Post Code CR0 7PB	1.26	40	25	31.75	19.84	<Outer Suburban	<Outer Suburban	1.60
Post Code CR0 8UB	1.70	71	30	41.89	17.70	<Outer Suburban	<Outer Suburban	2.37
Post Code CR0 7NA	1.97	36	18	18.27	9.14	<Outer Suburban	<Outer Suburban	2.00
Post Code CR0 7NE	0.83	26	11	31.33	13.25	<Outer Suburban	<Outer Suburban	2.36
Post Code CR0 7RL	1.40	60	24	42.72	17.09	<Outer Suburban	<Outer Suburban	2.50
Post Code CR0 7PX	0.96	21	11	21.81	11.43	<Outer Suburban	<Outer Suburban	1.91
Shirley Oaks Village ^{Note 2}	19.12	1,286	545	67.26	28.50	Outer Suburban	Outer Suburban	2.36
Shirley "Place" ^{Note 1} (Estimate)	770.00	32,995	13,981	42.85	18.16	<Outer Suburban	<Outer Suburban	2.36
Average	152.02	6,071	2,570	39.01	16.77	<Outer Suburban	<Outer Suburban	2.34

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

Note 2: All the green areas in Shirley Oaks Village, except for the 1.4 Hectares off Poppy Lane were legally classified as Ancillary space for the houses in the section 52 agreement with the Council when the estate was built. This was because the houses were built with small gardens.

Local Area Type Settings Analysis (recent proposals) based upon assessment by the National Model Design Code & Guidance

2.5 The smaller the area assessed, the greater the accuracy of the definition of the **Area Type**. In fact, there are likely to be pockets within an **Area Type Setting** which are at a **higher Density** than the overall assessment and therefore a higher **Area Type** category than the prevailing **Area Type Design Code** for that wider local **Area** and vice versa. Defining **Area Type Codes** across and within **Wards** or **Places** is essential for the **Policy** to work as **Area Types** will vary across a 'Ward' or the 'Places' of Croydon.

2.6 **Croydon Plan Review – “Wards” & “Places”**

2.6.1 There are **28 Wards** in **Croydon** and **16 Places** defined in the Current and Revised (2021) **Local Plan**. We have searched the **Revised Croydon Plan** for “**Wards**” and it seems none are listed or referenced; all **Policies** are related to the “**Places**” of Croydon which are listed at **Section 11** at Policies **DM34 to DM49**.

2.6.2 The **Area Type Setting** analysis (Table above) applies to all **28 Croydon Wards** but cannot be defined for the “**16 Places**” of Croydon, as the “**Places**” have no defined boundaries or defined dwellings or populations and therefore cannot accurately be used as a determining factor for **Area Type Settings**. The **Croydon Plan** could however provide guidance based upon the local **Wards** or smaller defined areas such as **estates** or **areas of common character assessments**.

2.6.3 The **Revised Croydon Local Plan (2021)** at **Section 11 Shirley Place DM45** should reflect the **Area Type Settings** based on an assessment of the local **Area**, number of dwellings and populations within the **Ward** or within any referenced **local Areas** within the “**Place**” in accordance with the **National Model Design Code & Guidance**. **Similarly**, other **Croydon “Places”** should be redefined appropriately. We believe the current designations quoted are incorrect when assessed by the **National Guidance**.

2.6.4 It is assumed that the supporting infrastructure of an **Area Type Setting** is appropriate for that **Area Type Setting** and therefore any increase above the threshold of that **Area Type** would require improved infrastructure for sustainable development.



- 2.7 It is noted that Croydon has overall averages at **(less than) “<Outer Suburban” Area Type Setting** or **‘(less than)’ i.e., “<Outer (London) Suburban” Area Type Setting**, which is rather surprising, but there is likely to be pockets of **higher Density Areas** (Post Code Areas or smaller) which might include higher **Area Type Settings** which would only be identified if localised **Design Codes** for the area were assessed.
- 2.7.1 However, there is **no Ward average** which can be considered **“Urban”** or above **“Suburban” based on the 2021 census** and as defined by the **National Model Design Code Guidance**. **Does the Croydon LPA agree with this assessment?**
- 2.7.2 **“Outer-Suburban”** or **“Outer (London) Suburban”** is a new designation (for Croydon LPA) which requires Redesignation of the Shirley **“Place”** (and presumably other **Wards/Places**, especially in the South of the Borough) in the **Revised Croydon Local Plan**.
- 2.8. If a proposal deviates significantly from the **Local Design Code Area Type** and the Case Officer is minded to approve the development or redevelopment proposal, the reasons and **justifications** for exceeding (or if significantly below) the **Area Type Setting** should be included in the Case Officer’s recommendation report, including any required infrastructure improvement to support an increase in density for the **Area Type Setting**.
- 2.8.1 In the case of a proposal significantly exceeding the Area Type Setting density, the proposal should automatically be referred to the Planning Committee, irrespective of whether referred by a Ward Councillor or the threshold of comments is breached. This would seem an appropriate management solution as the proposed development to be considered would need all aspects of supporting infrastructure to be either available or planned to ensure sustainability of an approval of the proposal and the committee could engage with officers to ensure these issues are fully debated and addressed. In such cases it may be appropriate to increase an objectors’ speech from the current 3 minutes to say 5 minutes to address these additional issues.

3 Planning Policies

3.1 The Revised Croydon Local Plan (2021) ⁴

3.1.1 The draft Croydon Local Plan (2018 Revised in 2021) contains only two references to **Design Codes** at **DM38.1** and **DM38.2** but gives no guidance to the relevance or the actual meaning or definition of the Policy.

3.2 The London Plan (2021)

3.2.1 The London Plan **Policy D3** requires **Design Codes** be defined and also that developments meet **“Site Capacities”** but gives no methodology how these Policies should be defined, achieved or measured.

3.2.2 The **London Plan Supplementary Planning Guidance - “Small Site Design Codes”** published in February 2022 for consultation provides guidance, mainly referencing the **National Model Design Code & Guidance**.

⁴ <https://www.croydon.gov.uk/sites/default/files/2022-01/croydon-local-plan-2018-revised-2021-part-1-start-to-section-11.pdf>

3.2.2.1 The **Small Site Design Codes** guidance provides information on how to prepare area-wide housing **design codes** on small sites for a range of character types. Where appropriate, planning authorities and neighbourhood planning groups should refer to this guidance at the plan making stage when developing design codes. Once a design code is adopted for a specific area, boroughs and other decision-makers are expected to use these as a basis for proposals and decision making.

3.3 The London Plan Supplementary Planning Guidance

3.3.1 Extract from **London Plan LPG - Small Site Design Codes**:

Para 1.1 What are small site design codes?

Para 1.1.1 London Plan policy H2 requires boroughs to prepare **design codes** for small sites, where appropriate. These **small site design codes** are a particular type of **design code** that can be applied to a '**character type**' (also called an '**area type**' within the **National Model Design Code**) within a given area. These **design codes** should proactively support well-designed new homes on small sites by providing **clarity and certainty over the design and quality of small site residential development**. They are a key mechanism to delivering a borough's small sites housing target and an increase in housing through incremental housing developments.

Para 1.1.2 **Small sites**: are residential developments on sites up to **0.25 hectares**. Development on these sites may include new build; infill development on vacant or under-utilised sites; upward extensions of existing buildings (including non-residential developments); residential conversions, redevelopment and extension of existing sites.

Para 1.1.3 **Design codes**: are a set of simple, concise, illustrated **design requirements** that are visual and **numerical wherever possible** to provide specific, **detailed parameters for the physical development of a site** or area.

Para 1.1.4 This guidance only covers area-wide **design codes** for incremental intensification of small sites. Design coding for larger sites, such as site allocations, is detailed in the Optimising **Site Capacity: A Design-led Approach** LPG. Boroughs or neighbourhood planning groups may also choose to develop **site-specific briefs or design codes** for **small sites** where necessary but **should refer to the guidance above** when undertaking this.

3.3.2. This consultation closed on 27th March 2022, and we await publication of a final approved version. **MORA** responded to this consultation ⁵ but we have not seen any results of our submissions to date. The London Plan Website as of December 2022 stated: "**Public consultation on the guidance closed on 27 March 2022. A final version of the guidance will be published later in 2022**". We are still waiting. – This deadline was not met.

3.3.3 Thus, to date, the London Plan still has no adopted guidance on the appropriate methodology to define local **Area Type Design Code Settings**.

3.4 The NPPF (20 Jul 2021)

3.4.1 The NPPF at **Paras 128 & 129** references the **National Model Design Code & Guidance** which indicates should be used for assessment **if there is no Local Guidance available**.

⁵ <https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance/optimising-site-capacity-design-led-approach-lpg>



3.4.2 **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.***

3.5 The revised draft **NPPF (2022)** proposes the following (*track changes*) (Consultation 22 Dec 22 to 2 Mar 23)⁶

3.5.1 **Section 2 para 7** to include:

“The purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes and other forms of development, including supporting infrastructure in a sustainable manner.”

3.5.2 **New paragraph 135**

*133.135. “Local planning authorities should ensure that they have access to, and make appropriate use of, tools and processes for assessing and improving the **design of development.** The primary means of doing so should be through the preparation and use of **local design codes**, in line with the **National Model Design Code.** For assessing proposals there is a range of tools These including workshops to engage the **local community**, design advice and review arrangements, and Policies may also make use of the nationally described space standard, where the need for an internal space standard can be justified.”*

3.6 **Local Area Type Setting Design Codes**

3.6.1 The above Table lists the **Shirley local areas** and their parameters to define the local **Design Code Area Type Setting** as defined by the **National Model Design Code & Guidance**. The Occupancy (if unknown) is calculated using the **National UK average Occupancy (2021)** ⁷ as the ‘National’ **Model Design Code** is a ‘National’ Assessment.

3.6.2 It is not possible to provide a similar or equivalent assessment for the “**Places**” of Croydon as the “**Places**” have no defined areas, population figures or number of Units (dwellings) for a sensible evaluation or assessment.

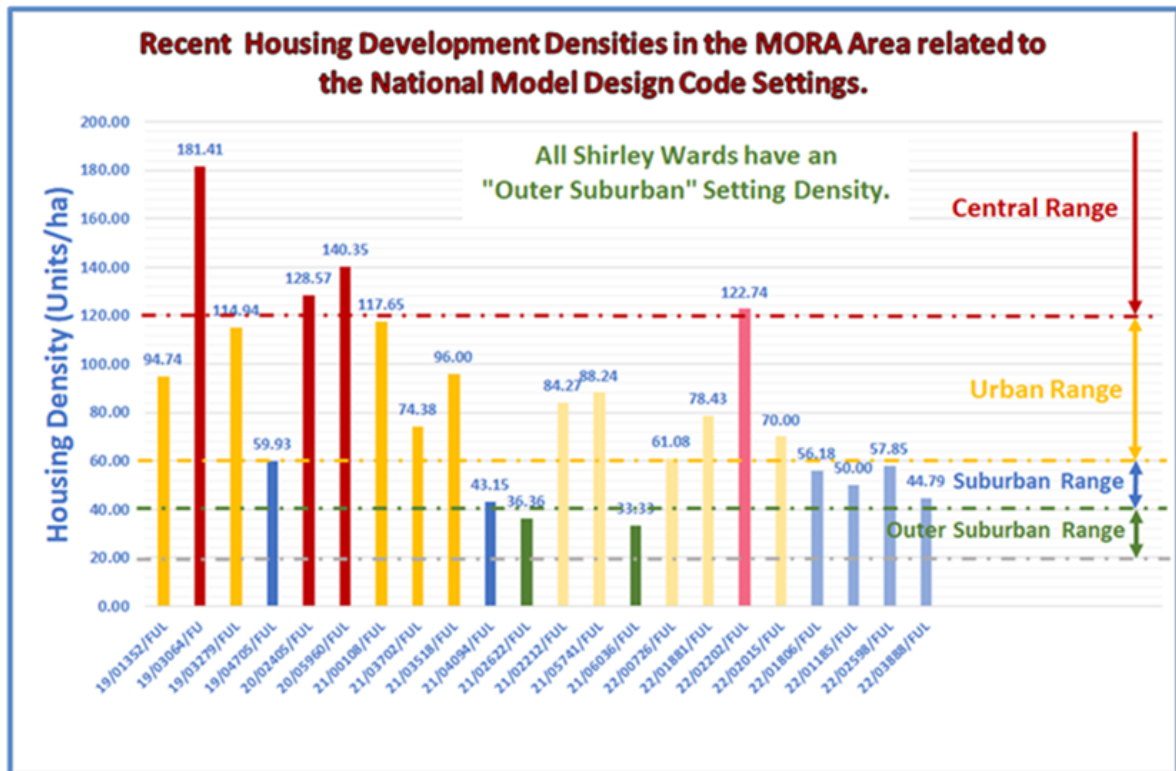
3.6.3 **All the Local Areas of Shirley are equal to or less than (- or <) the “Outer Suburban” based upon an assessment using the National Model Design Code Area Type Setting Guidance.**

⁶ <https://www.gov.uk/government/consultations/levelling-up-and-regeneration-bill-reforms-to-national-planning-policy>

⁷ <https://www.statista.com/statistics/295551/average-household-size-in-the-uk/>

4 Planning Officer's Interpretation of Local Densities

- 4.1 Prior to the revision of the **London Plan**, Development proposals were assessed (*or should we say, 'should have been assessed'*) on the **London Plan Policy** which included the '**Density Matrix**', which related **Density** based upon the **Area Settings; Suburban, Urban or Central** as defined by **TfL**, and the **Public Transport Accessibility Level (PTAL) 0** (Zero) through to **PTAL 6** (6a & 6b) against a proposals Housing and Residential Densities.
- 4.2 The **London Plan Policy** on **Density** relating to **PTAL**, and the **Density Matrix** was disregarded by Officers and the **Density Matrix** fell into disuse and was omitted from the revised **London Plan 2021**.
- 4.3 Resultant on the removal of the **London Plan Density Matrix**, there was an absence of policy on appropriate **local Densities** and the **Local Character** of development proposals was ignored in the face of pressure to increase housing units for Housing Need and Targets irrespective of the local character or the availability of supporting infrastructure.
- 4.4 There has therefore been no defined **Croydon LPA Policy** to control or *manage* development proposals appropriate **Mass, Bulk** or **Density** since the adoption of **Croydon Plan (2018)** to ensure sustainable developments with respect to appropriate levels of supporting **infrastructure** or appropriate respect of the localities character, in which the development is destined.
- 4.5 The local Residents thus lost confidence in the Planning Process as a result of significant overdevelopments of localities resulting on the lack of any defining **Policy** to "**Manage**" developments, or redevelopment proposals appropriate **Housing** or **Residential Densities**. This was a fundamental requirement of the job description of the LPA Development Management Department.
- 4.6 However, based upon the issue of the **National Model Design Code & Guidance** as published by the **Department for Levelling Up Communities & Housing (DLUCH)** it can be seen that, of the very recent applications and approvals, many have NOT been assessed professionally by the **LPA** for our locality as shown by the graphical analysis below, although the Trendline indicates the densities are starting to become more representative of the character of the destined localities.
- 4.7 The graphical illustration below highlights recent applications and approvals within the **Shirley North Ward**, defined as "**Outer Suburban**", which clearly indicates overdevelopment when assessed on the basis of the **National Model Design Code & Guidance**.
- 4.7.1 This analysis shows that only **2%** of applications were **appropriate for the destined locality** of '**Outer Suburban**', but that **27%** were appropriate for a '**Suburban Area**' Type, **45%** were appropriate for an '**Urban**' Area Type and **18%** were appropriate for a '**Central**' Area Type, none of which above **Outer Suburban** had anywhere near the **appropriate required supporting infrastructure** for the development(s).
- 4.7.2 This is a preposterous result which **clearly indicates that many recent approvals under the LPA Policies of the 2018 Croydon Local Plan were significantly 'over-developments'** and was the fundamental reason why local residents across the Borough completely lost confidence in the Planning Process.



Recent Development proposals and approvals for the MORA Area (Outer-Suburban) clearly show that Planning Officers have no Policy Guidance on what is an appropriate Density for the Local Area Type Setting of the Locality.

- 4.8 We, and possibly other Residents' Association would appreciate a recognition that this analysis is correct and an answer, why was this allowed, and what was the reason for this unmanaged development strategy, by the LPA Development Management Department? In addition, what is in place to ensure developments are professionally managed within the limits of a local Area Type Setting in the future?
- 4.9 Can the LPA agree that the 2018 Croydon Local Plan allowed development proposals which breached the requirement of sustainability, as the developments obviously exceeded the available supporting infrastructure by disregarding the London Plan Density Matrix to manage appropriate Densities for the proposals, (the only available management tool to assess densities in the then adopted Planning Policies)?

5 Population Expansion

- 5.1 The figures and assessments in this Discussion Paper are based upon the 2021 Census/Estimates as published. ⁸ However, the significant high-rise developments in the Fairfield Ward (Croydon Centre) could have major implications on the available supporting infrastructure – Health provision, Hospital Capacity requirement, Schooling Places, etc., which are not catered for in this analysis.

⁸ <https://www.citypopulation.de/en/uk/london/wards/>

- 5.2 Are Croydon LPA taking due account of the probable increase in population and the necessary improved supporting infrastructure on the provision of these increases in dwellings and subsequent increase in population in their approval of these developments?

6 Other Designation inputs for Area Type Setting Definitions

- 6.1 The Area provision of Public Transport Accessibility (PTAL) rating, current and forecast. The London Plan Policy D2 Infrastructure requirements for sustainable densities, requires:

A 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)²⁶.

B 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.

- a) The Area provision of GP Surgeries as a relationship per 1000 Residents, current and forecast. (Target provision is suggested at 0.5 GPs per 1000 patients. Planning approvals should ensure the threshold is maintained)
- b) The Area provision of School Places as a relationship of number at academic year Children to the number of available places, current and forecast. (Planning approvals should ensure the threshold is maintained for the next academic year).
- c) Public Transport Accessibility Level (PTAL), Current & Forecast
- d) Open Space Areas (Relationship to Population Density for the Design Code Area).
- e) Physical Utilities Infrastructure availability (Electricity Power Supply available capacity in kw/hr, Gas & Water Pressures), Sewerage etc.

7 Predominant Housing Types:

- a) Bungalows detached or semi-detached.
- b) Maisonettes
- c) Houses Detached or Semi-Detached
- d) Flats (including number of Units and whether on single or more floors/unit)
- e) Flats (number of Units/Dwellings)
- f) Flats above commercial or retail premises
- g) High Rise tower Blocks of various Unit/apartment configurations.

8 Design Code Check List:

(All proposals' parameters listed are required to be provided by the applicant in a proposal's "**Validation Check List**").

- h) Site Area. In hectares or sq.m.
- i) Appropriate Housing Density - Number of units per hectare (units/ha).
- j) Appropriate Residential Density - Number of bedspaces per hectare (Bedspaces/ha). (hr/ha Open Plan accommodation confuses Habitable Room numbers with functional areas and therefore are irrelevant).
- k) Number of bedrooms per hectare (Bedrooms/ha)
- l) The Gross Internal Area (GIA) in (sq.m.)
- m) The Build Area footprint in sq.m.
- n) The Building Line Set-Back in metres. (For the locality & Application)
- o) The Floor Area Ratio & Total (Gross Internal Area of all floors / site area)
- p) The Site Coverage Ratio (Gross External (Footprint) Area of ground floors/site area)
- q) The maximum height in metres above ground for each Finished Floor level and to Eaves of each building.
- r) Play Space Allocation for Children. (Probable number of children of a proposal)
- s) Communal Open Space for occupants of blocks of Flats or HMOs.

9 Discrepancies & Contradictions in the National Model Design Code Guidance

(Those marked in this text identifies conflicting statements in the National Model Design Code official publication Last updated 14 October 2021)⁹ We have queried these anomalies with the Department for Levelling Up Housing & Communities on 5th December 2022 with a follow-up on 5th January 2023 but have not received a response or an acknowledgement to either request!

9.1.1 Part 1, Built; Form i) – Page 20 Density:

- a) Town Centres: **>200 d/ha¹⁰** (conflicts with 1.1 f at **>120d/ha**)
- b) Urban Neighbourhoods: **60 – 120 d/ha** (what is the designation **>120 & <200**)
- c) Suburbs: **30–50d/ha⁹** (conflicts with 1.1 c & d which states **20–60 d/ha**).

9.1.2 Part 1, Built Form ii) - Plot Ratio: (GIA/Site Area)

- a) Town Centres: **>2**
- b) Urban Neighbourhoods: **<1**
- c) Suburbs: **<0.5⁹** (conflicts with NMDG Fig 19 which states "**>0.5**")

⁹ <https://www.gov.uk/government/publications/national-model-design-code>

¹⁰ Clarification raised with the Department for Levelling Up, Communities & Housing on 5th December 2022 followed up on 5th January 2023. (why different values listed in Part 1 Coding) – No response to date?



10 Croydon LPA Planning Policies

- 10.1 In order to recover Residents' confidence in the Planning Process, the LPA does need to recognise that implementation of Design Code Area Type Settings as defined in the **National Model Design Code & Guidance** needs to be embodied or referenced in the Croydon Local Plan (2023).
- 10.2 If Croydon LPA do not agree with these parameter definitions as explicitly defined in the **NPPF Model Design Codes and Guidance**, we need to know what their proposals are to replace them for Croydon – and, they also need to justify:
- Why is this guidance disregarded or inappropriate for the London Borough of Croydon?
 - What are the equivalent “Area Types” and Setting Density Ranges for Croydon? and
 - For what reason is Croydon different from the National Guidance?

Your comments, or criticisms, on the content and substance of this analysis would be appreciated to: Planning@mo-ra.co

Kind Regards



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