

## Planning Policy: Croydon Local Plan Growth Policies:

This discussion document addresses the methodology appropriate to determine a proposal's capacity for 'sustainable' *Growth* within the terms used in the Local Plan.

### 1 Growth Policies

- 1.1 The current **Croydon Local Plan (2018)**<sup>1</sup> 'Growth' Policies, as defined in Table 6.4, DM10.1 to DM10.11 or DM34 to DM49 and DM36 to DM49 'purports' to describe "**Growth**" by either "**Redevelopment**" or "**Evolution**" by "**Regeneration**", but gives no definition of the acceptable magnitude of that growth in terms of '**Site Capacity**', '**Local and future infrastructure**', '**Public Transport Accessibility**' or '**Local character**' and therefore the Policy is categorically '**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.
- 1.2 The Draft Revised Croydon Plan<sup>2</sup> (2021) 'Growth' Policies at **SP1.0C** lists "**Focused**", "**Moderate**" & "**Gentle**" **Densification/Intensification** as designated '**Growth Areas**' and are shown on the **Interactional Policies Map** but does **NOT** define what is meant by these designations or what differentiates them from each other. The **Revised Croydon Local Plan (2021)** does **NOT** reference any **guidance** to define "**Growth**" or actually "**manage**" '**Growth**' in **Residential Areas** in terms of the '**Area Type Setting**', the available '**Site Capacity**' and local supporting '**Infrastructure**'.

### 2 Revised Croydon Local Plan (2021)

- 2.1 **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*.
- 2.2 There is no further clarification in the **Revised Local Plan (2021)** Policy definition at **DM10** which defines or clarifies any differences between these '**Growth** designations.
- 2.3 If the Planning Officers have no clearly defined Policies to reference, they cannot effectively discharge their responsibilities for the "**Management of Developments**" – their fundamental Job Description of "**Development Management**"?
- 2.4 The following provides "**Guidance**" to assess future evolution and "**Growth**" in terms of **Densification/Intensification** of proposed developments for '*managed*' "**Growth**" which must ensure **sustainability** within the available **supporting infrastructure**.

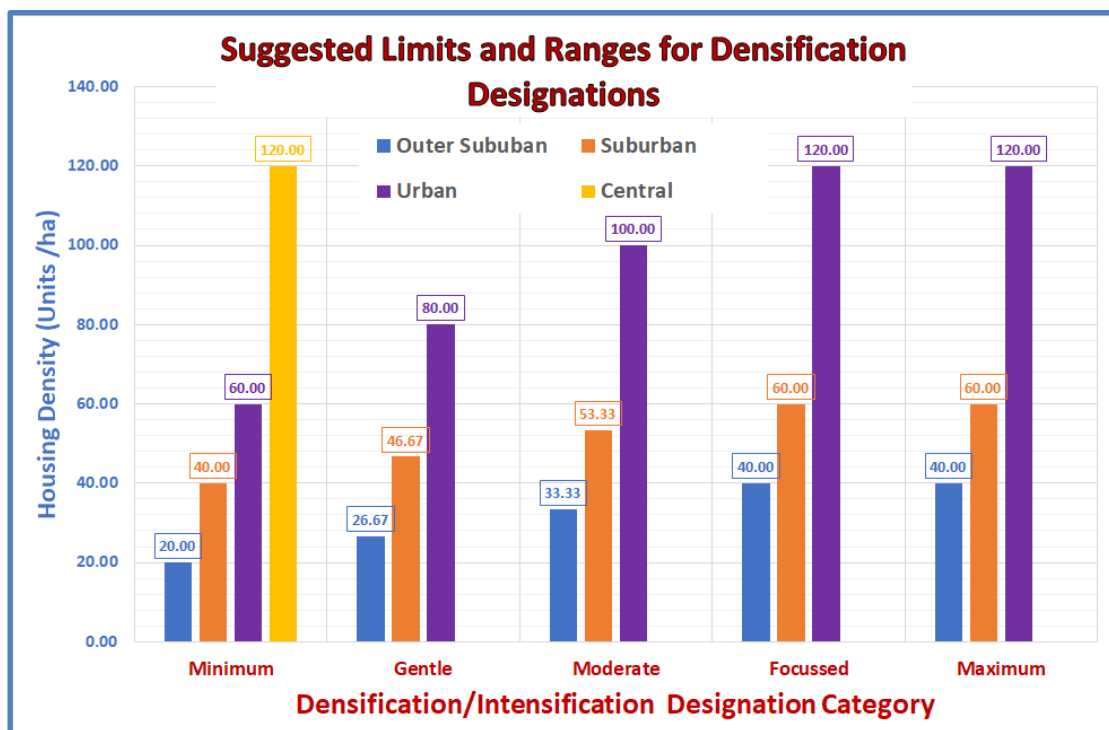
<sup>1</sup> [https://www.croydon.gov.uk/sites/default/files/Planning/Regeneration/Croydon\\_Local\\_Plan\\_2018.pdf](https://www.croydon.gov.uk/sites/default/files/Planning/Regeneration/Croydon_Local_Plan_2018.pdf)

<sup>2</sup> <https://www.croydon.gov.uk/sites/default/files/2022-01/croydon-local-plan-2018-revised-2021-part-1-start-to-section-11.pdf>

- 2.5 Unrestricted **“Growth”** within areas of **limited infrastructure** which only supports the existing **Area Type Setting** population, would allow **unsustainable** and **illegal developments** with inadequate planned **infrastructure improvement** to sustain the proposed **increase in Residential Densities**.

### 3 **Densification/Intensification**

- 3.1 As each of the **National Model Design Code Area Types** currently relies on the **available supporting infrastructure for the locality**, unless there are programs of **‘improved infrastructure’** over the life of the plan, any **densification or Intensification** within an **Area Type Setting** relies on that **‘existing Supporting Infrastructure’** and therefore any **“densification” or Intensification** should **remain within** the defined **range** of the **Area Type Setting**, in order to ensure **“sustainability”** of **supporting infrastructure** for the proposed development. This is fundamental to the requirement of sustainability.<sup>3</sup>
- 3.2 The following **Graphical Illustration** shows an extremely simple **‘suggested’ incremental increase in Design Code Housing Density** (units/ha) of **1/3 (33%)**, **“Gentle”** & **2/3 (66%)**, **“Moderate”** incremental limit within the **Ranges** of **“Outer Suburban”**, **“Suburban”** and **“Urban”** for **“Gentle”**, **“Moderate”** and for **“Focussed” Intensification**, an increase to the **maximum (100%)** of the current setting as an example. There is no limit to **“Central”** **Area Type Settings** which is managed by the requirement to meet **Minimum Internal Space Standards** (London Plan Table 3.1).

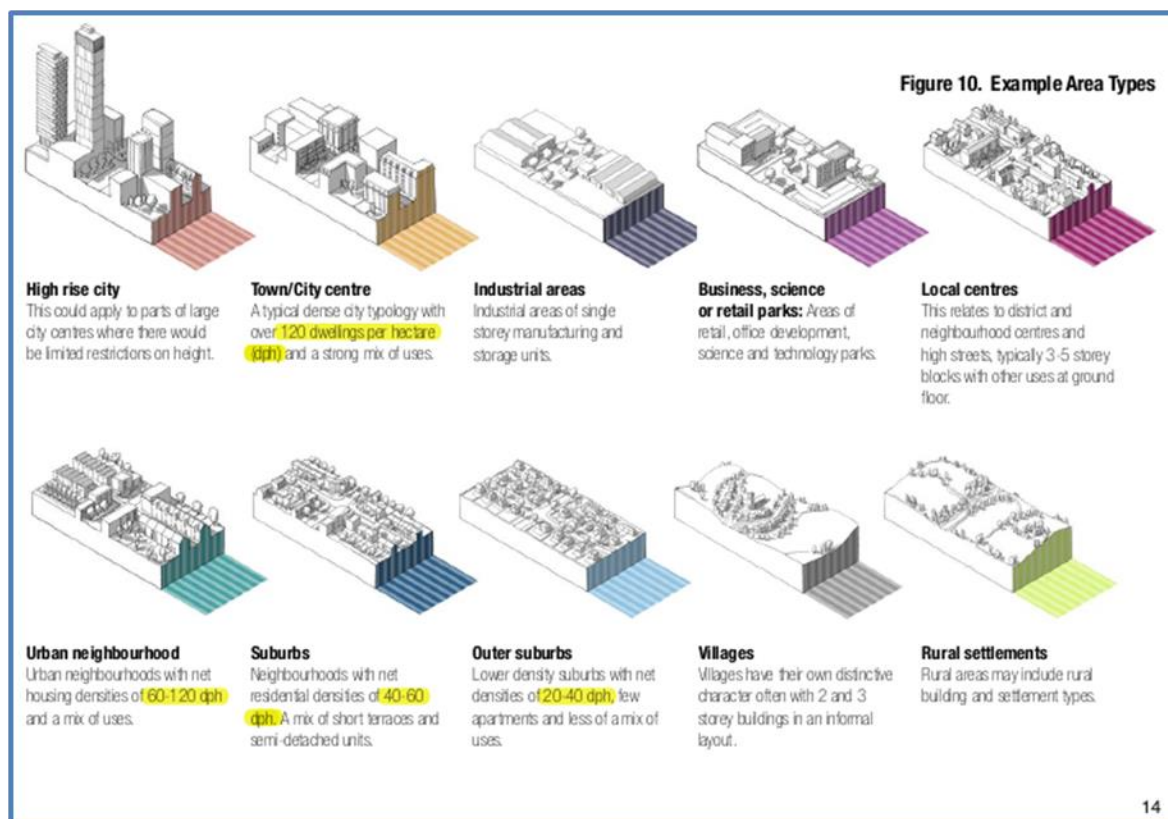


**Illustration of Increased Densification/Intensification within the Area Type Settings to ensure Sustainable Infrastructure Support for proposed Developments.**

- 3.3 This is our interpretation of the **Local Plan Policy**, as there is no **'meaningful' guidance** in the **Croydon Revised Local Plan (2021)** or the **London Plan (2021)**. Sustainability of Developments is a **Legal Requirement** which cannot be guaranteed if the **Densification or Intensification** exceeds the available **supporting infrastructure** if there is no prospect of **improved infrastructure** over the Life of the Plan. **The LPA could recommend alternative proposals** or provide **alternative guidance** with **allowable tolerances** within the **Area Type Setting Design Code Densities** but has not done so to date.

## 4 Local Design Code Area Types.

- 4.1 **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.**
- 4.2. The **Area Type Settings** as defined in the **National Model Design Code & Guidance** are:
- Rural Settlements** very dispersed dwellings within a rural environment.
  - Village** (rural) dispersed clusters of dwellings of low densities on large site areas <20 U/ha.
  - Outer Suburban** – Design Code Housing Density **20 to 40 Units/ha**
  - Suburban** - Design Code Housing Density **40 to 60 Units/ha**
  - Urban** - Design Code Housing Density **60 to 120 Units/ha**
  - Town/City Centre** - Design Code Housing Density **>120 Units/ha**
  - 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).







Location	Area (ha)	Population	Dwellings (Units) (Nat Ave)	Residential Density (bs/ha) (Nat Ave)	Housing Density (Units/ha)	"Setting" for Design Code Residential Density (bs/ha)	"Setting" for Design Code Housing Density (U/ha)	Occupancy Ratio (Nat Ave 2.36)
Croydon	8,652.00	390,719	165,559	45.16	19.14	<Outer Suburban	<Outer Suburban	2.36
Ward								
Addiscombe East	148.40	11,460	4,856	77.22	32.72	Outer Suburban	Outer Suburban	2.36
Addiscombe West	137.50	16,212	6,869	117.91	49.96	Suburban	Suburban	2.36
Bensham Manor	144.60	16,932	7,175	117.10	49.62	Suburban	Suburban	2.36
Broad Green	217.20	20,221	8,568	93.10	39.45	Outer Suburban	Outer Suburban	2.36
Coulsdon Town	484.50	15,425	6,536	31.84	13.49	<Outer Suburban	<Outer Suburban	2.36
Crystal Palace & Upper Norwood	263.40	16,347	6,927	62.06	26.30	Outer Suburban	Outer Suburban	2.36
Fairfield	146.00	15,354	6,506	105.16	44.56	Suburban	Suburban	2.36
Kenley	552.50	10,984	4,654	19.88	8.42	<Outer Suburban	<Outer Suburban	2.36
New Addington North	136.50	10,946	4,638	80.19	33.98	Outer Suburban	Outer Suburban	2.36
New Addington South	254.90	11,322	4,797	44.42	18.82	<Outer Suburban	<Outer Suburban	2.36
Norbury Park	222.80	10,825	4,587	48.59	20.59	Outer Suburban	Outer Suburban	2.36
Norbury & Pollards Hill	130.80	12,133	5,141	92.76	39.31	Outer Suburban	Outer Suburban	2.36
Old Coulsdon	673.90	10,115	4,286	15.01	6.36	<Outer Suburban	<Outer Suburban	2.36
Park Hill & Whitgift	206.60	5,783	2,450	27.99	11.86	<Outer Suburban	<Outer Suburban	2.36
Purley Oaks & Riddlesdowne	270.30	9,713	4,116	35.93	15.23	<Outer Suburban	<Outer Suburban	2.36
Purley & Woodcote	461.70	15,190	6,436	32.90	13.94	<Outer Suburban	<Outer Suburban	2.36
Sanderstead	711.60	15,767	6,681	22.16	9.39	<Outer Suburban	<Outer Suburban	2.36
Selhurst	149.80	13,184	5,586	88.01	37.29	Outer Suburban	Outer Suburban	2.36
Selsdon & Addington Village	602.00	9,925	4,206	16.49	6.99	<Outer Suburban	<Outer Suburban	2.36
Selsdon Vale & Forestdale	526.90	10,017	4,244	19.01	8.06	<Outer Suburban	<Outer Suburban	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
South Croydon	384.40	18,053	7,650	46.96	19.90	<Outer Suburban	<Outer Suburban	2.36
South Norwood	197.80	16,438	6,965	83.10	35.21	Outer Suburban	Outer Suburban	2.36
Thornton Heath	171.70	18,008	7,631	104.88	44.44	Suburban	Suburban	2.36
Waddon	339.90	18,687	7,918	54.98	23.30	Outer Suburban	Outer Suburban	2.36
West Thornton	197.60	18,768	7,953	94.98	40.25	Suburban	Suburban	2.36
Woodside	215.30	16,881	7,153	78.41	33.22	Outer Suburban	Outer Suburban	2.36
Average	309.32	13,954	5,913	60.20	25.51	Outer Suburban	Outer Suburban	2.36

Location	Area (ha)	Population (Nat Ave)	Dwellings (Units) (Nat Ave)	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 (Nat Ave 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 <sup>Note 2</sup>	19.12	1,286	545	67.26	28.50	Outer Suburban	Outer Suburban	2.36
Shirley "Place" <sup>Note 1</sup> (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

**Table of assessment of Area Type Settings for the 28 Wards of Croydon and various Localities and Post Codes within Shirley Wards based on the 2021 Census.**

- 4.3 The above tables illustrate the **Croydon** and **28 Croydon Wards**, the **Shirley Wards** and various **Post Code** areas of **Shirley** as examples to show the local **Area Type Settings** as defined by the **National Model Design Code & Guidance**.
- 4.4 The **National Model Design Code & Guidance** is a **National** assessment; it is therefore reasonable to relate **Housing Density** to **Residential Density** assuming a **UK National average Occupancy per Unit**. **National Statistics** <sup>4</sup> shows this is an average of **2.36** (2021) occupancy - persons per dwelling - for the **UK Nationally** as a basis for Policy definition.

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

- 4.5 The analysis shows that **Croydon** is predominantly **<Outer Suburban or Outer Suburban** with a few Wards at **Suburban Area Type Settings**, but none are actually within **Urban** or **Central Area Types** as defined by the **National Model Design Code & Guidance**. However, there could be **small pockets** of much **higher density Area Type Settings** if smaller local areas i.e., **Post Codes** are assessed, especially for high-rise apartment Blocks in the Town Centre.
- 4.6 **Shirley Wards** are predominantly **<Outer Suburban** (*less than*) with some areas within **Outer Suburban Area Type Ranges** but none are within a **Suburban** or above **Area Type Settings**. This is true even when assessing various examples of **Shirley Post Code Areas**. The above assessments are based on the latest known **Population** figures and the number of dwellings, where known or otherwise on the **National Average Unit occupancy**.

## 5 **Densification and Intensification Policy Definitions**

### 5.1 **London Plan Policy H2 Small sites:**

#### 5.1.1 **London Plan Policy para 4.2.4 states:**

*“Incremental intensification of existing residential areas within PTALs 3-6 or within 800m distance of a station<sup>47</sup> or town centre boundary<sup>48</sup> is expected to play an important role in contributing towards the housing targets for small sites set out in Table 4.2. ...”*

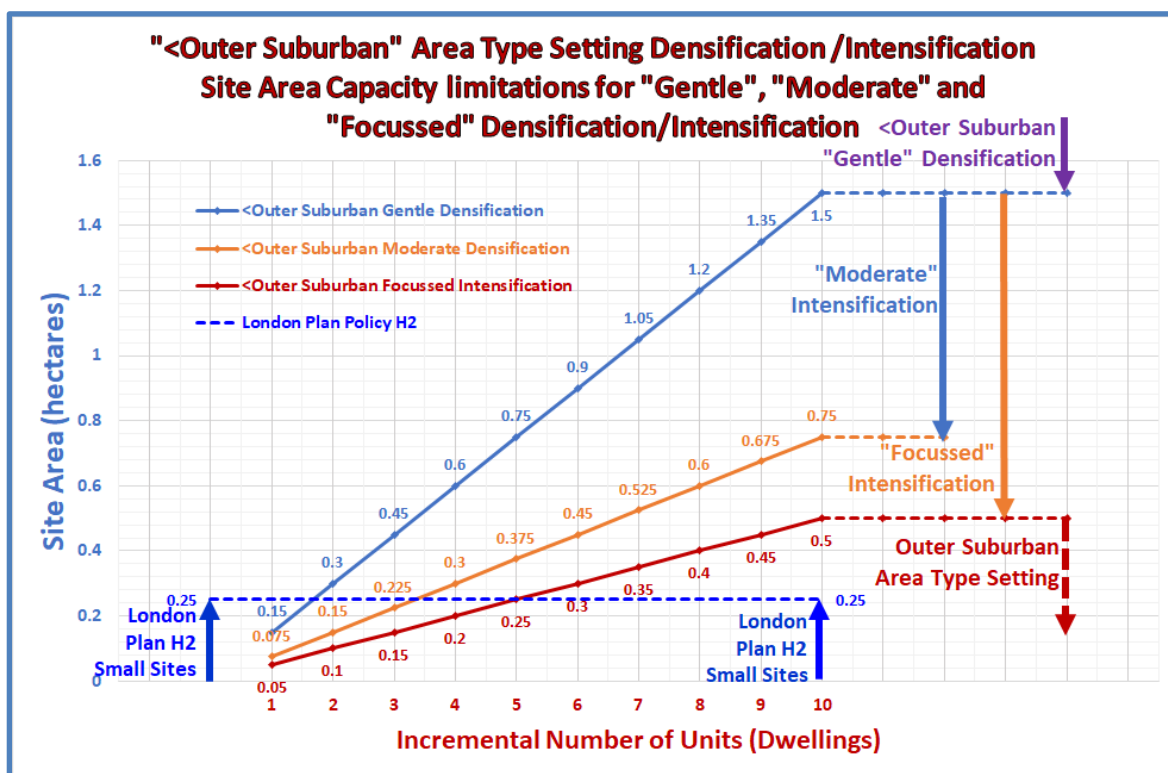
- 5.1.2 **Incremental is an ‘adjective’** (*‘increasing or adding on, especially in a regular series’*). Although there is no rate definition of **“Increment”**, localities with **PTALs <3 and >800m from a Train/Tram Station or District Centre** are thus **‘inappropriate’** for **‘Incremental Intensification’**. (*Whatever subjectively, ‘incremental intensification’ actually means?*)

- 5.2.3 Analysis of the appropriate **“Site Capacities”** required to support **densification** or **intensification** for **Area Type Settings** assumes the **Site Capacities** in hectares for an incremental increase in number of **Units** (Dwellings) for each category of **Densification & Intensification**, would follow a simple linear increase where:

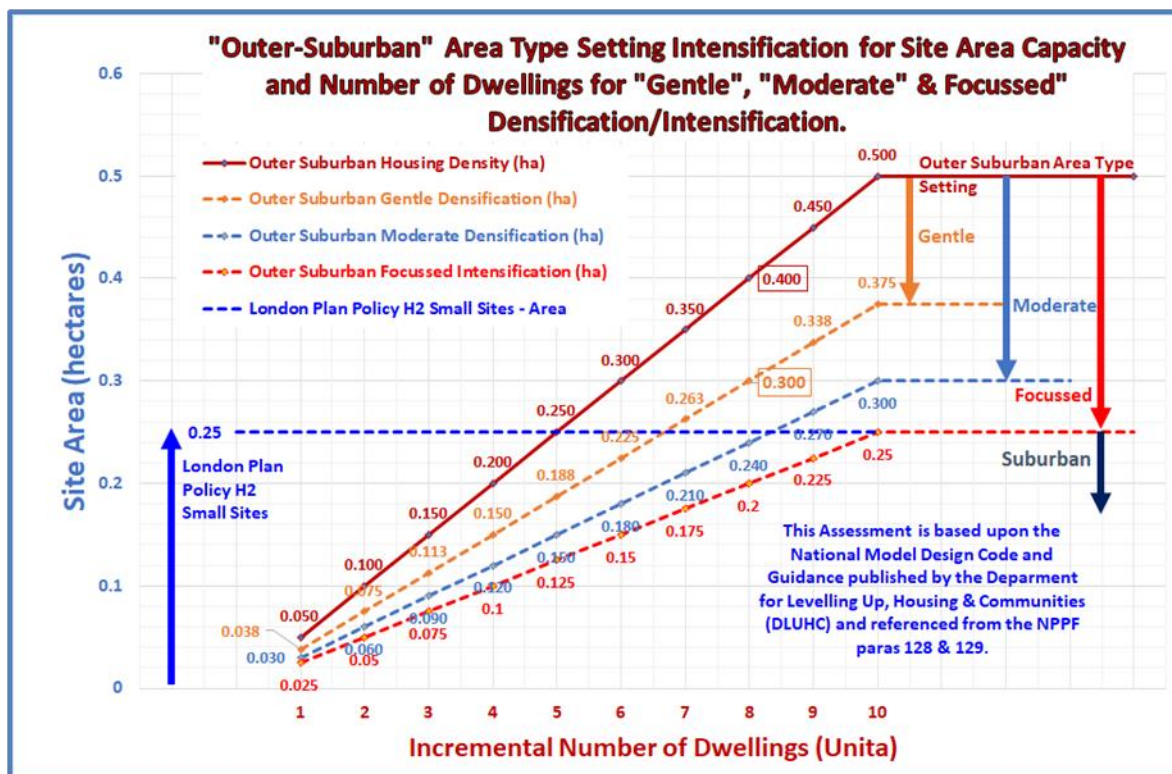
$$y = \left(\frac{\delta y}{\delta x}\right)x + c; \text{ where } y = \text{Site Area (ha)}, x = \text{No of Units and } c = y \text{ when } x = 0$$

- 5.2.4 The Graphical illustrations below provide **Site Capacities** appropriate for the various situations of **settings “<Outer Suburban”, “Outer Suburban”, “Suburban”, and “Urban” Gentle Densification or Moderate/Focussed Intensification**.
- 5.2.5 The graphical illustrations show the incremental increase in **units from 1 to 10** as this is the range normally seen locally. Extrapolation of the range to identify **Area Site capacity** above **10 units** would follow the projected straight-line function. This is a very simple methodology to provide guidance for an acceptable level of **densification/intensification** within acceptable ranges of **Area Types and Settings** where currently there is no guidance.
- 5.2.6 Although the **Shirley North Ward** does not include any **“Suburban”** or **“Urban” Area Type Settings Design Code** categories, we show an equivalent graphical illustration of **Site Capacities** for the **densification/intensification** for **“Suburban”** and **“Urban” Area Type Settings** for completeness of Policy definitions.

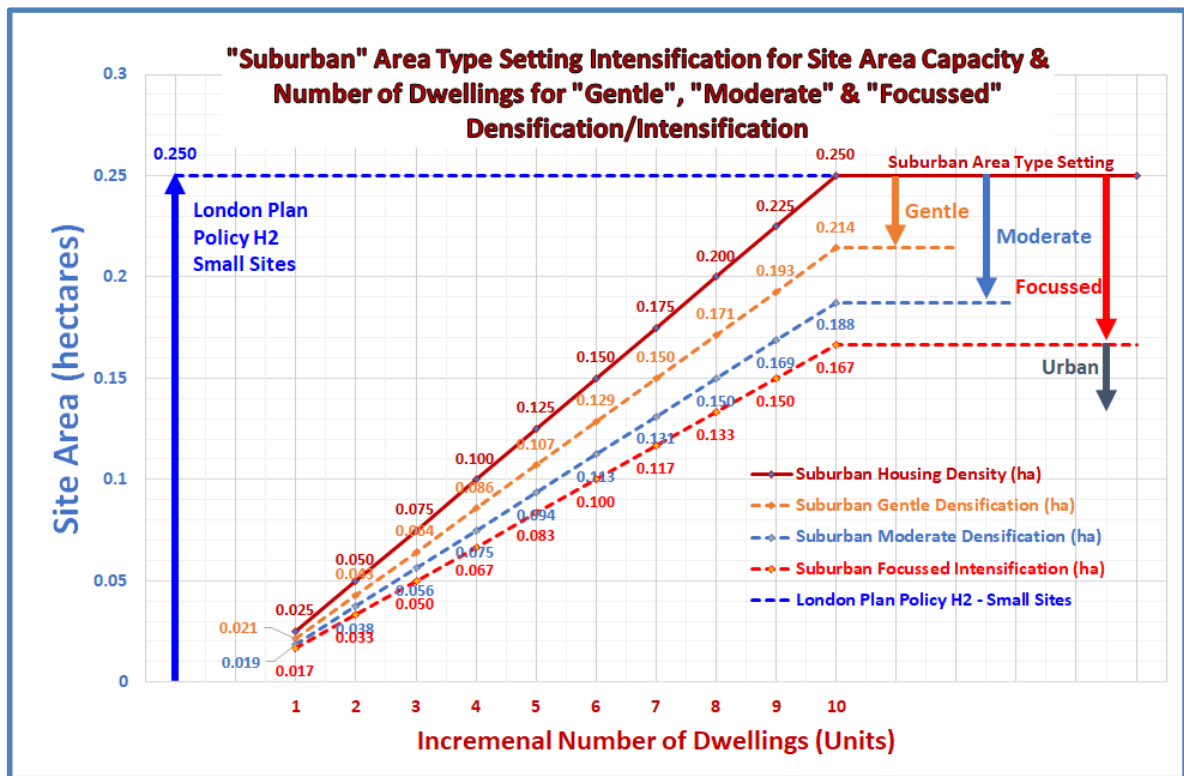




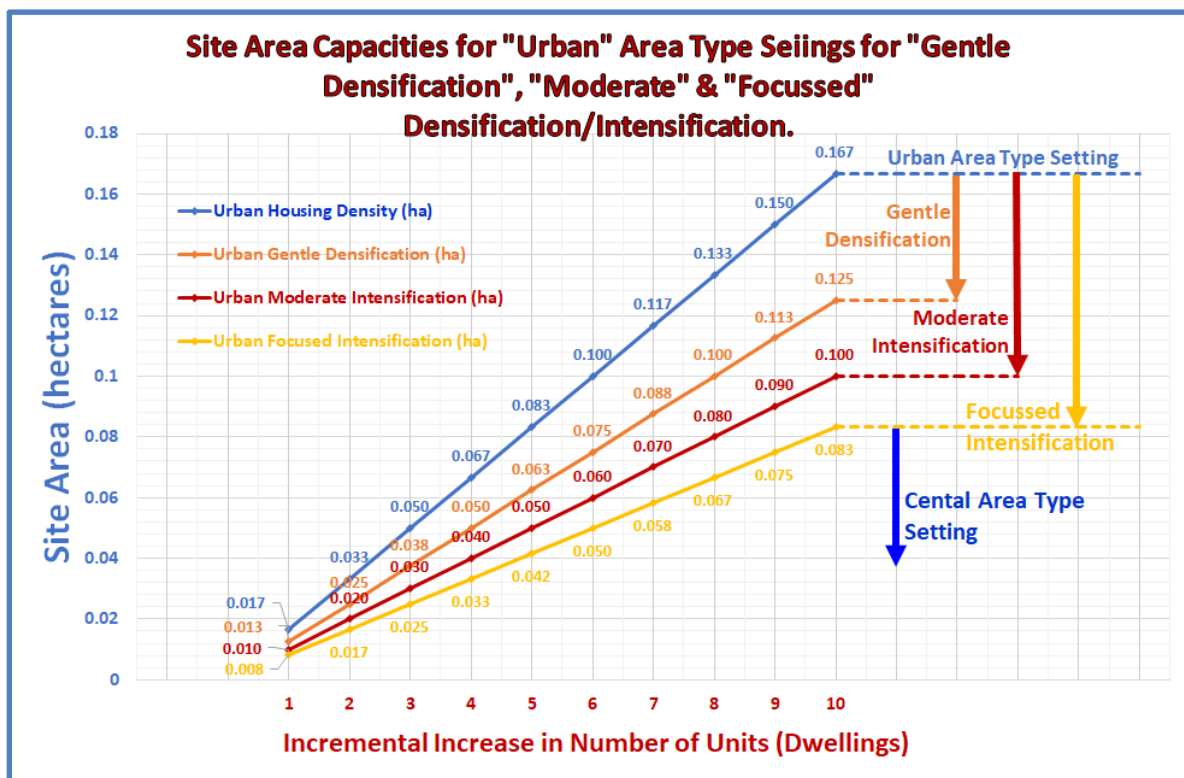
**Site Capacities for "<Outer Suburban" Area Type Settings**  
**Densification/Intensification.**



**Site Capacities for "Outer Suburban" Area Type Settings**  
**Densification/Intensification**



**Site Capacities for "Suburban" Area Type Settings Density/Intensification**

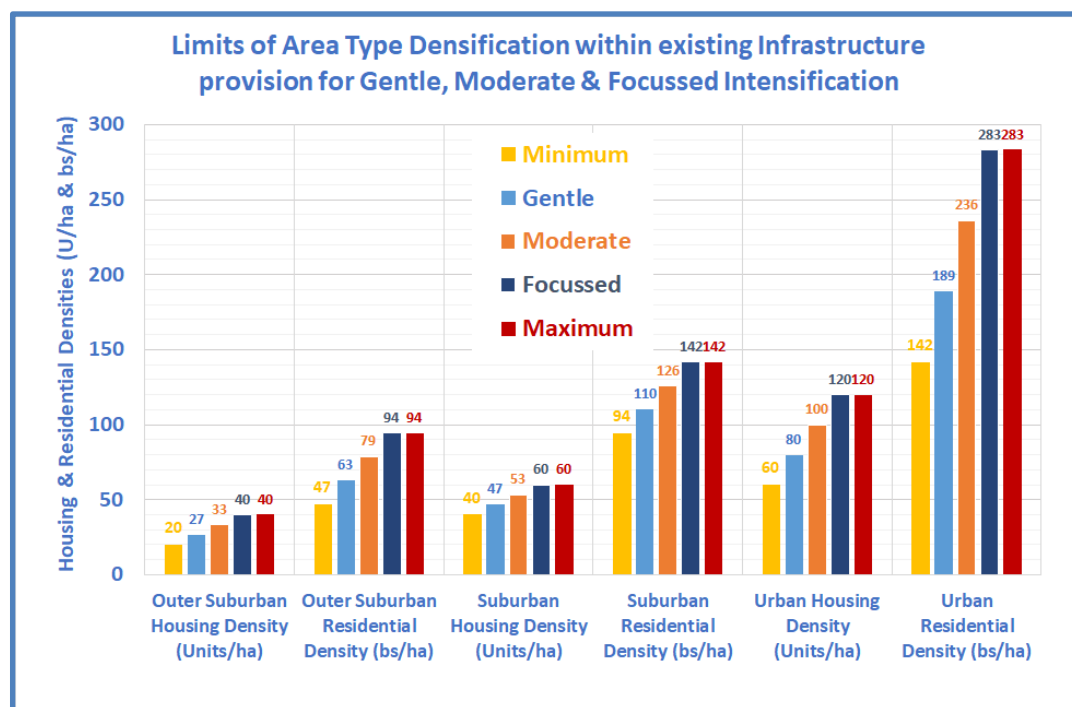


**Site Capacities for "Urban" Area Type Settings Density/Intensification**

- 5.2.7 As there is no defined **Density** for a “Central” **Area Type Settings** other than greater than **<120 Units/ha**, the maximum Density of any **Unit** in a **Central Area Type Setting** is only limited by the “**Minimum Internal Space Standards**” as specified in the **London Plan Table 3.1.** and therefore, **Densification** and **Intensification** in a **Central Area Type Setting** is unrestricted.
- 5.2.8 The **Site Areas** shown above give the **appropriate guidance** at an **Area Type Setting** for the designated **densification/Intensification**. However, it is unlikely that developers would exactly meet the specific **Site Area** requirement and therefore a suitable **Tolerance ± or % deviation could be allowed**. The **Planning Officer** would need to justify such deviation, or the “**Planning Guidance**” could define an allowable tolerance limitation.
- 5.2.9 This methodology provides a basis for the ‘**Management**’ of “**Growth**” where **none** currently exists in the **Revised Croydon Local Plan (2021)**.

## 6 Residential Density & Supporting Infrastructure

### 6.1 Densification & Intensification for Housing & Residential Densities



**Graphical illustration of Housing & Residential Densities for the National Model Design Code Area Types for recommended “Gentle,” “Moderate” & “Focussed” Intensification**

- 6.1.1 As the **Area Types Settings** are based upon the **National Model Design Code Guidance**, we can use a **National** average value of **Unit Occupancy** using the Statista <sup>5</sup> **National UK Unit Occupancy** of **2.36 persons/Unit** (UK 2021) as a conversion factor from **Units/ha** to **bedspaces/ha**.

<sup>5</sup> <https://www.statista.com/statistics/295551/average-household-size-in-the-uk/>



- 6.1.2 The average **National Housing** occupation per housing unit **Nationally** is **2.36 persons (2021)**. Therefore, we can assume **Nationally**, the **Outer-Suburban Setting** Housing Density at 20 to 40 Units/ha would have 20 x 2.36 Persons/ha **≈47.2 persons/ha** to 40 x 2.36 persons/ha **≈94.4persons/ha**. Similarly, for **Suburban Settings** with Housing Density of 40 Units/ha would have **≈94.4persons/ha** to 60 x 2.36 persons/ha **≈141.6persons/ha** and **Urban Settings**, 60 to 120 units/ha would have **141.6persons/ha** to **283.2persons/ha**. The Site Capacities in hectares for an incremental increase in number of Units (Dwellings) for each category of Densification & Intensification are graphically specified above.

## 7 **London Plan Policy D2 Infrastructure requirements for sustainable densities.**

### 7.1 **London Plan Policy D2 States:**

**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)<sup>26</sup>*

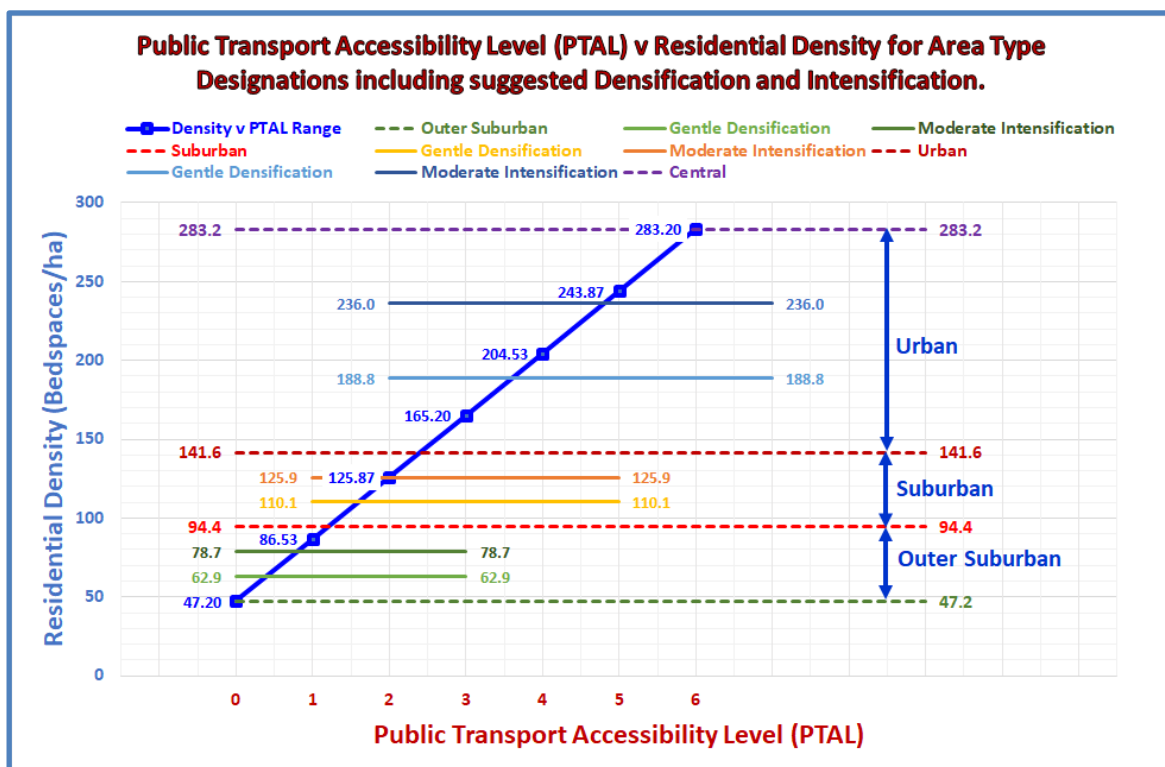
**B** *Where there is currently **insufficient capacity** of existing **infrastructure** to **support proposed densities** (including the impact of cumulative development), boroughs should work with applicants and infrastructure providers to ensure that **sufficient capacity will exist at the appropriate 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.*

**C** *When a proposed development is acceptable in terms of use, **scale** and **massing**, given the surrounding built form, uses and character, but it **exceeds the capacity** identified in a **site allocation** or the site is not allocated, and the borough considers the **planned infrastructure capacity will be exceeded**, additional **infrastructure proportionate** to the **development** should be **delivered through the development**. This will be identified through an **infrastructure assessment** during the planning application process, which will have regard to the **local infrastructure delivery plan** or programme, and the CIL contribution that the development will make. **Where additional required infrastructure cannot be delivered, the scale of the development should be reconsidered to reflect the capacity of current or future planned supporting infrastructure.***

- 7.2 It is People that require supporting infrastructure such as GP Surgeries, Health Facilities, Schools and Transport Accessibility. The Housing Units require the physical infrastructure of utility services, Gas, Electric, Water & Sewers.

- 7.3 Does the LPA have access to the distribution and availability of GPs per 1000 persons, as it does have for School populations and available future spaces per academic year? If so, these should be published or referenced in the Local Plan to give guidance for the ratio of compliance of a proposal to be within the requirement of a catchment area.

- 7.4 The provision of **Public Transport Accessibility** is available from the **TfL WebCAT** in the form of **PTAL** <sup>6</sup> and provides an opportunity to assess the relationship between the **PTAL measure of infrastructure availability and density**, including **Densification** or **Intensification**.



**Illustration of distribution of Public Transport Accessibility Level distributed across the Area Type Setting Ranges showing “Gentle” & “Moderate” Densification/Intensification.**

- 7.5 The distribution of **PTAL** over the **Area Type Ranges** should be in proportion with the local **Residential Density (Persons/ha)** to reflect the required level of provision, where the **lowest level of Residential Density** is at the lower level of the **PTAL Range** and the **highest Residential Density** at the **highest PTAL levels** as illustrated above.
- 7.6 This should also correspond to the level of allowed **“Densification”** or **“Intensification”** to ensure **sustainable** infrastructure support.
- 7.7 Any proposal **± or %** deviation or within a defined acceptable tolerance from these recommended proportionate requirements should be **justified** by the Case Officer.

## 8 London Plan Policy D3 Optimising ‘Site Capacity’ through the Design-Led Approach:

- 8.1 London Plan Policy D3 States:

<sup>6</sup> <https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcat/webcat>

**“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 **Policy D2 Infrastructure requirements for sustainable densities**<sup>7</sup>), and that best delivers the requirements set out in **Part D**.”**

#### **Policy D3 Para 3.3.2**

**“A design-led approach to optimising site capacity should be based on an “evaluation”<sup>8</sup> of the **site’s attributes**, its surrounding context and its capacity for growth to determine the appropriate form of development for that site.”**

#### **Policy D3 Para 3.3.4**

**“Designating appropriate development capacities through site allocations enables boroughs to proactively **optimise the capacity** of strategic sites through a consultative **design-led** approach that allows for meaningful engagement and collaboration with **local communities**, organisations and businesses.”**

#### **Policy H2 Para 4.2.5.**

**“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**. (The issue is there is **NO** definition of the magnitude of “**incremental**”, but a definition should be defined in the **Design Code**).”**

8.2 Numerical analysis and evaluation of parameters is the only **feasible** methodology which defines the acceptability or otherwise of whether a proposal is within the **limits** of a **Site’s Capacity**. The objectives the **London Plan Policy D2 Infrastructure requirements for sustainable densities**, are to ensure supporting infrastructure for sustainable developments and the objectives of **London Plan Policy D3** are to **ensure** developments are appropriate for the proposal’s **Site Capacity**.

8.3 The **Communities & Local Government** Department has published a series of documents and guidance on the production and definition of **Local Design Codes and Guidance**<sup>9</sup> Referenced from the NPPF (July 2021) at paras 128 & 129.

**“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**

<sup>7</sup> [https://www.london.gov.uk/sites/default/files/the\\_london\\_plan\\_2021.pdf](https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf)

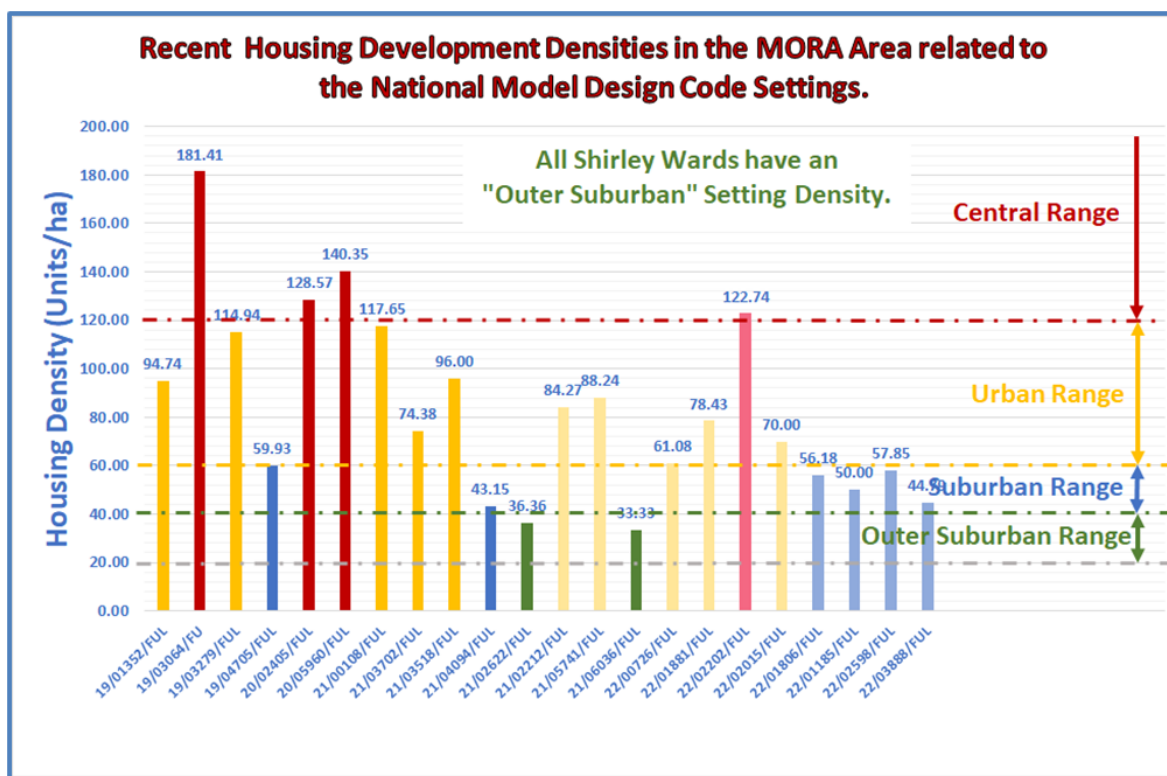
<sup>8</sup> Definition of “**evaluation**”: The making of a judgement about the **amount, number, or value** of something.

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

*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.**"*

8.4 These Policy requirements need inclusion prior to adoption of the Revised Local Plan.

8.5 Planning Officers' lack of acknowledgement or understanding of the Policies are reflected in the following graphical analysis of recent **Development Applications** and/or Approvals.



**Evidence that Planning Officers do NOT know the difference between Area Type Setting or appropriate Densifications/Intensifications for sustainable developments.**

8.6 It should be recognised that the **MORA Area** of 178.26ha and ≈3884 dwellings with population of ≈9,166 (based upon National average of 2.36 occupants/Unit) has a Housing Density of **21.79U/ha** and Residential Density of **51.42persons/ha** and is just within the lower level of "**Outer Suburban**" Area Type Setting. However, recent applications and approvals have clearly ignored this **local character** or **Area Type Setting** limitation. This has significantly contributed to Local Residents' complete loss of confidence in the Planning Process which we are trying to overcome by recommending an acceptable Policy proposal supported by **National Guidance**.





- 8.6.1 This analysis shows that only **2%** of applications were appropriate for the locality of '**Outer Suburban**', but that **27%** were appropriate for a '**Suburban Area**' Type Setting, **45%** were appropriate for an '**Urban**' Area Type Setting and **18%** were appropriate for a '**Central**' Area Type Setting none of which above **Outer Suburban** had anywhere near the **appropriate supporting infrastructure** for the development. This is a monstrous 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.
- 8.6.2 We, and possibly other Residents' Associations 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? In addition, what is in place to ensure developments are professionally managed within the limits of a local Area Type Setting in the future?
- 8.6.3 Can the LPA agree that the 2018 Croydon Local Plan allowed development proposals which breached the requirement of sustainability as the developments exceeded the available supporting infrastructure by disregarding the London Plan Density Matrix to define appropriate Densities for approved proposals?

## 9 Population Expansion

- 9.1 The figures and assessments in this Discussion Paper are based upon the 2021 Census/Estimates as published.<sup>10</sup> 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, for the whole of the Borough.
- 9.2 Are Croydon LPA taking due account of the probable increase in population and Residential density from the **High-Rise** residential tower blocks, services supporting requirements resultant on the approval of these High-Rise developments in the Croydon Central Wards?
- 9.3 Your comments, or criticisms, on the content and substance of this analysis would be appreciated to: [Planning@mo-ra.co](mailto:Planning@mo-ra.co)

Kind Regards

Derek Ritson  
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<sup>10</sup> <https://www.citypopulation.de/en/uk/london/wards/>