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**Monks Orchard
Residents' Association
Planning**

28th February 2023

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Reference:	22/05049/FUL
Application Received:	Mon 05 Dec 2022
Application Validated:	Fri 03 Feb 2023
Address:	46 The Glade Croydon CR0 7QD
Proposal:	Demolition of existing property and construction of 2 no. 3 bedroom houses and 2 no. 2 bedroom houses with parking spaces
Status:	Awaiting decision
Consultation Expiry:	Wed 08 Mar 2023
Determination:	Fri 31 Mar 2023
Case Officer:	Christopher Grace

Dear Mr Grace – Case Officer,

Please accept this letter as a formal objection to **Application Ref: 22/05049/FUL** for Demolition of existing property and construction of 2 no. 3 bedroom houses and 2 no. 2 bedroom houses with parking spaces.

This proposal is an improvement on the previous proposals for this Site but still unfortunately exceeds the Site Capacity and Area Type Settings appropriate for the locality and supporting infrastructure as we shall demonstrate in the following submission.

The proposal exceeds the local Area Type Setting as defined by the National Model Design Code & Guidance, referenced from the NPPF.

Design & Access Statement Illustration Facing The Glade:



Elevation showing revised Hipped Roof Formation.

1 The Proposed Parameters:

46 The Glade			App Ref: 22/05049/FUL											
Site Area	1020 sq.m.	Supplied Drawings					Floor Area Ratio		0.55	Post Code	CR0 7QD			
App Form	0.102 ha	Bedrooms Density		98.04 b/ha		Plot Area Ratio		N/A	Area	1.51	ha			
Footprint	N/A sq.m.	Residential Density		156.86 bs/ha					Persons	68	(persons)			
Units	4	Residential Density		176.47 hr/ha		PTAL		2011	0	Dwellings	24	(Units)		
		Housing Density		39.22 U/ha		PTAL		2021	0	Housing Density (U/ha)		15.89		
		Average Occupancy		4.00 bs/unit		PTAL		2031	0	Residential Density (bs/ha)		45.03		
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)	Amenity Space (Required)	Probable Adults	Probable Children	Play Space (Required)	
Unit 1	Terraced	Ground	0	0	1	68.7	70.00	0.0	2.0	7.00	2	1	10	
	M4(2)	First	2	3	3	55.4		not stated						
Sub Totals			2	3	4	124.1	70.00	0.0	2.0	7.00	2	1	10	
Unit 2	Terraced	Ground	0	0	1	68.7	99.00	0.0	2.5	7.00	2	3	30	
	M4(2)	First	2	3	3	55.4		not stated						
		Second	1	2	1	34.5		0.0						
Sub Totals			3	5	5	158.6	99.00	0.0	2.5	7.00	2	3	30	
Unit 3	Terraced	Ground	0	0	1	68.7	99.00	0.0	2.5	7.00	2	3	30	
	M4(2)	First	2	3	3	55.4		not stated						
		Second	1	2	1	34.5		0.0						
Sub Totals			3	5	5	158.6	99.00	0.0	2.5	7.00	2	3	30	
Unit 4	Terraced	Ground	0	0	1	68.7	70.00	0.0	2.0	7.00	2	1	10	
	M4(2)	First	2	3	3	55.4		not stated						
Sub Total			2	3	4	124.1	70.00	0.0	2.0	7.00	2	1	10	
Grand Total			10	16	18	565.4	338.0	not stated	9.0	28.0	8.0	8.0	80	
Note 1: Built-In Storage Space on floor plans if shown have no dimensions. Also Built-In Storage Space Not mentioned in the Design & Access Statement.														

Note 1: Built-In Storage Space on floor plans if shown have no dimensions, Also Built-In Storage Space Not mentioned in the Design & Access Statement.

2 Initial Comments and Observations

2.1 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.

2.2 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)

2.3 The **Design & Access Statement** at '**Schedule of Accommodation**' states:

Schedule of Accommodation

2 No 3 Bedroom 4-Person M4(2) compliant dwellings.

2 No 2 Bedroom 4-Person M4(2) compliant dwellings.

Whereas the actual Plans illustrate:

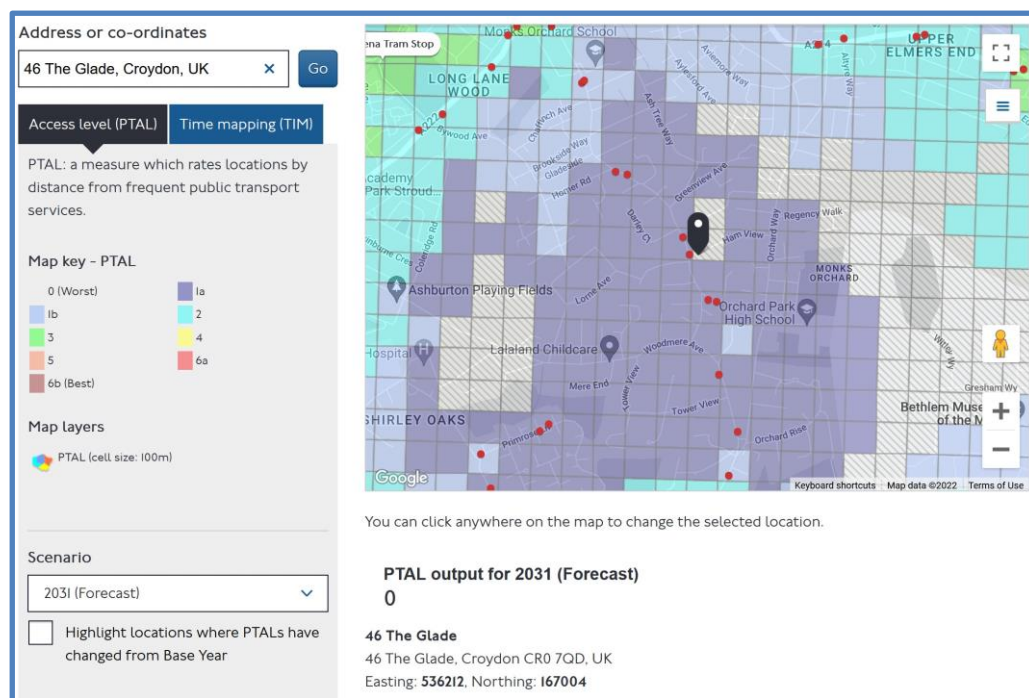
2 no's: 2-bedrooms (One single and one double) = 3-persons and;

2 no's: 3-Bedrooms (One single & two Double, or Three single & One double)

5-Persons which equates to **10 Bedrooms** and **16 Persons**.

2.4 The Public Transport Accessibility Statement

2.4.1 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 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.

2.4.2 On entering the proposal address, the TfL WebCAT ² returns **Zero (0)** at Base Year 2011, & 2021 & Forecast 2031 for **46 The Glade** which are (**Easting: 536212, Northing: 167004**). These are different to those at **Appendix A** of the **Transport Statement**. As indicated on the display, it is possible to click anywhere on the Map to select a location thus the Applicant has moved the location slightly westward & southward to indicate a **PTAL** of **1a**.

2.4.3 This is a '**misrepresentation**' of the true **PTAL** for **46 The Glade**, possibly '**intentionally**' or by accident, either is an inappropriate representation of the locality Area Type Design Code.

2.5 Parking

2.5.1 The Croydon Plan Residential Parking for PTAL Zero at Table 10.1 states:

1 space per Unit for 1 & 2-Bedroom Dwellings and

1.5 spaces per Unit for 3 or more Bedroom dwellings

For this proposal, the parking provision should ∴ be **5 parking spaces**.

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

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>

- 2.5.2 The London Plan Residential Parking for Outer London PTA Zero at Table 10.3 states:
1.5 spaces per Unit for 1- & 2-Bedroom Dwellings and
1.5 spaces per Unit for 3 or more Bedroom dwellings
For this proposal, the parking provision should \therefore be **6 parking spaces** when only 5 are provided.

2.6 In-Built Storage

- 2.6.1 The **London Plan Policy D6 – Housing Quality Standards** at **Table 3.1** defines the required “**Minimum**” Internal Spaces Standards for New Dwellings including Built-In Storage Space.
- 2.6.2 The proposal does **NOT** provide any defined **Built-In Storage Space** and therefore the proposal is **Non-Compliant to London Plan Policy D6 Table 3.1**. Thus, unless clarification on the requirement is provided to meet the policy, this application must be refused as lack of in-built Storage is inappropriate for the future occupants for the life of the development.

3 Site Capacity.

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

3.1.1 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 **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 plans³ 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.*

3.1.2 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.

3.1.3 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**, 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 ⁴ **NPPF Section 2**.

3.2 **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.”*

3.3 **Croydon Local Plan**

3.3.1 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.

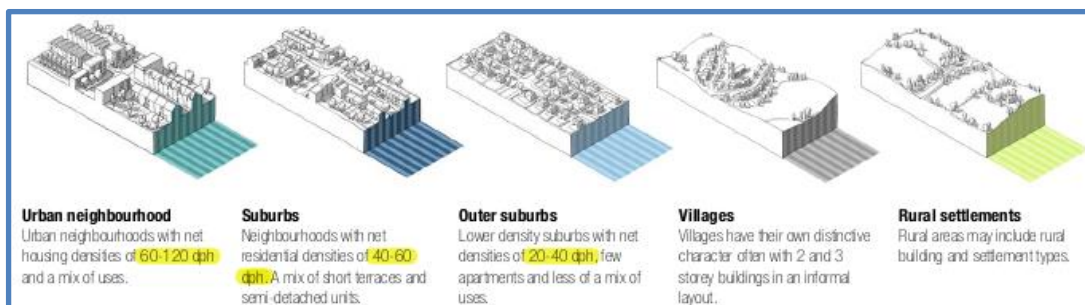
³ <https://www.croydon.gov.uk/planning-and-regeneration/planning-policy/planning-evidence-and-information/local-plan-evidence-topic/infrastructure-delivery-plan>

⁴

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

3.4 The LUHC National Model Design Code & Guidance⁵ Parts 1 & 2.

3.4.1 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.



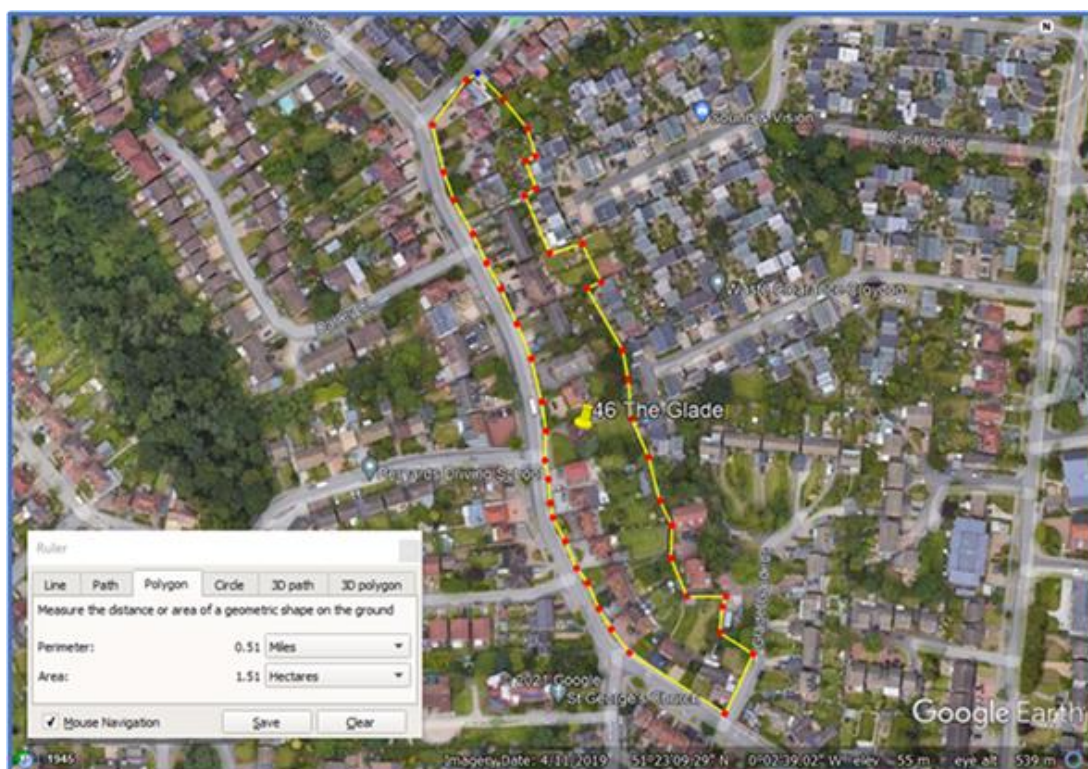
The National Model Design Code parameters Definitions for Local Settings

3.5 Local Design Code Assessment

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

3.5.2 The most suitable for this assessment is the area of the local **Post Code CR0 7QD** from **20 to 70 The Glade**.

3.5.3 **Post Code CR0 7QD Area.**



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

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

3.5.4 The **Post Code CR0 7QD** covers an area of **1.51ha** as measured approximately by Google Earth (see below). The **Valuation Office Agency** ⁶ (VOA) indicates the Post Code has **28 Dwellings** and the **Post Code Area Data** ⁷ indicates occupancy of **68 persons**, giving a **Local Design Code Housing Density** of $28/1.51 \approx 18.54\text{U/ha}$ and a **Residential Density** of $68/1.51 \approx 45.03\text{person/ha}$ which clearly places the local Design Code in an “<Outer Suburban” Area Type Setting.

3.5.5 **Post Code CR0 7QD Assessment.**

Parameters of Post Code 'CR0 7QD' Design Code					
Area Design Code Parameter (These parameters auto calc Design Code)		Input Parameters		Constraints	
Post Code	CR0 7QD			Ward	Shirley North
Area of Post Code (ha)	1.51	hectares		Flood Risks	30yr Surface
Area of Post Code (Sq.m)	15100	sq.m.		Gas	Low Pressure
Number of Dwellings (Units) (*)	28	Units		Water	N/A
Number of Occupants (Persons)	68	Persons		Sewage	N/A
Occupancy	2.43	Person/dwelling		HASL (m)	Average 55m
Post Code Housing Density	18.54	Units/ha		Building Line Set-Back	Various
Post Code Residential Density	45.03	Bedspaces/ha		Set-back Guidance	3 to 6m
Area Type (National Model Design Code)	<Outer Suburban	Setting			
(*) Last updated on 12 February 2023					
Design Code Parameters		Min	Max	Measure	
Area Type Setting (NMDC)	<Outer Suburban	0	20	Units/ha Range	
Equivalent ¹ Residential Density (Persons/ha)	<Outer Suburban	0.00	47.20	Persons/ha Range	
¹ Based on National Occupancy (2021) persons/Unit		<Outer Suburban	<Outer Suburban		
		U/ha	bs/ha		
PTAL (now)	0.00	20.00	47.20	Limits for PTAL	
PTAL (forecast 2031)	0.00	20.00	47.20	Limits for PTAL	
Gentle Intensification	(Limits in U/ha & bedspaces/ha)	6.67	15.73	Limits 'Gentle' Intensification	
Moderate Intensification	(Limits in U/ha & bedspaces/ha)	13.33	31.46	Limits 'Moderate' Intensification	
Focussed Intensification	(Limits in U/ha & bedspaces/ha)	20.00	47.20	Limits 'Focussed' Intensification	

Post Code CR0 7QD Design Code Assessment

3.5.6 **Application Assessment.**

Application Details			
Application Ref:	22/05049/FUL		
Address:	46 The Glade		
PostCode:	CR0 7QD		
LPA Consultation Close	08/03/23		
Application Parameters			
Site Area (ha)	0.1020	ha	
Site Area (sq.m.)	1020.00	sq.m.	
Units (Dwellings)	4.00	Units	
Bedrooms	10.00	Bedrooms	
Bedspaces	16.00	Persons	
Housing Density	39.22	Units/ha	
Residential Density	156.86	bs/ha	
Occupancy	4.00	bs/unit	
Gross Internal Area (GIA) offered	565.40	sq.m.	
Floor Area Ratio	0.55	#	
		Min	Max
Area Type Setting (Units/ha)	Outer Suburban	20.00	40.00
Area Type Setting (Bedspaces/ha)	Urban	141.60	283.20
		U/ha	bs/ha
PTAL (Current)	0.00	20.00	47.20
PTAL (Forecast)	0.00	20.00	47.20
PTAL Required (Urban)	2.79		

Interactional Application Assessment for Area Type Setting Design Code from proposal's parameters

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

⁷ <https://www.postcodearea.co.uk/>

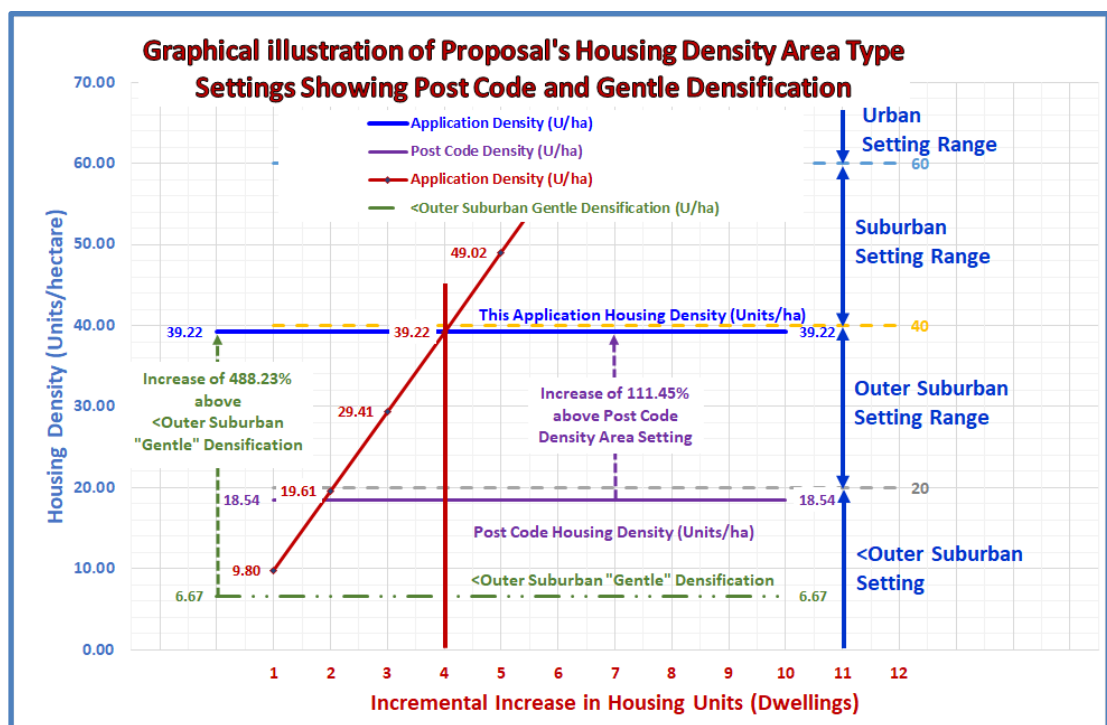
3.5.7 The **Post Code Design Code** assessment above clearly shows the **Area Type Setting** for the locality to be **<Outer Suburban** as defined by the **National Model Design Code and Guidance** at **Housing Density of 18.54Units/ha** and an actual **Residential Density of 45.03Persons/ha (<Outer Suburban)**.

3.5.8 **Comparison of Post Code & Application Design Code parameters.**

Difference Between Post Code (CR0 7QD) Design Code & Application Proposal			
Post Code Housing Density (Units/ha)	18.54	Area Type Setting	<Outer Suburban
Application Housing Density (Units/ha)	39.22	Area Type Setting	Outer Suburban
Difference	20.68	#	
Percentage Difference (%)	71.61	%	
Percentage Increase (%)	111.54	%	
Post Code Residential Density (bs/ha)	45.03	Area Type Setting	<Outer Suburban
Application Residential Density (bs/ha)	156.86	Area Type Setting	Urban
Difference	111.83	#	
Percentage Difference (%)	44.61	%	
Percentage Increase (%)	248.35	%	
PTAL available	0.00	<Outer Suburban	
PTAL Required	2.79	Urban	

Interactional assessment of Post Code and proposed Application Design Code Details differences.

3.5.9 **Assessment of Proposed Housing & Residential Densities.**



Graphical illustration of Housing Density at Post Code Area Type and for the Proposed Development.

3.5.10 The proposed development would have an **111.45% increase** in **Housing Density** from **Area Type <Outer Suburban** to **Outer Suburban** above that of the local **Area Type** as defined by the **Post Code Area** or a **248.35% increase** in **Residential Density** from **Area Type <Outer Suburban** through **Outer Suburban** to **Urban Area Type**, requiring an increase in supporting **PTAL** from **Zero** to **2.79**.



- ## Representing, supporting and working with the local residents for a better community

4 Growth, Intensification & Density.

4.1 Croydon Local Plan (2018) 'Growth' Policies

4.1.1 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**.

4.1.2 The Revised **Croydon Plan (2021)** 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.

4.2 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.

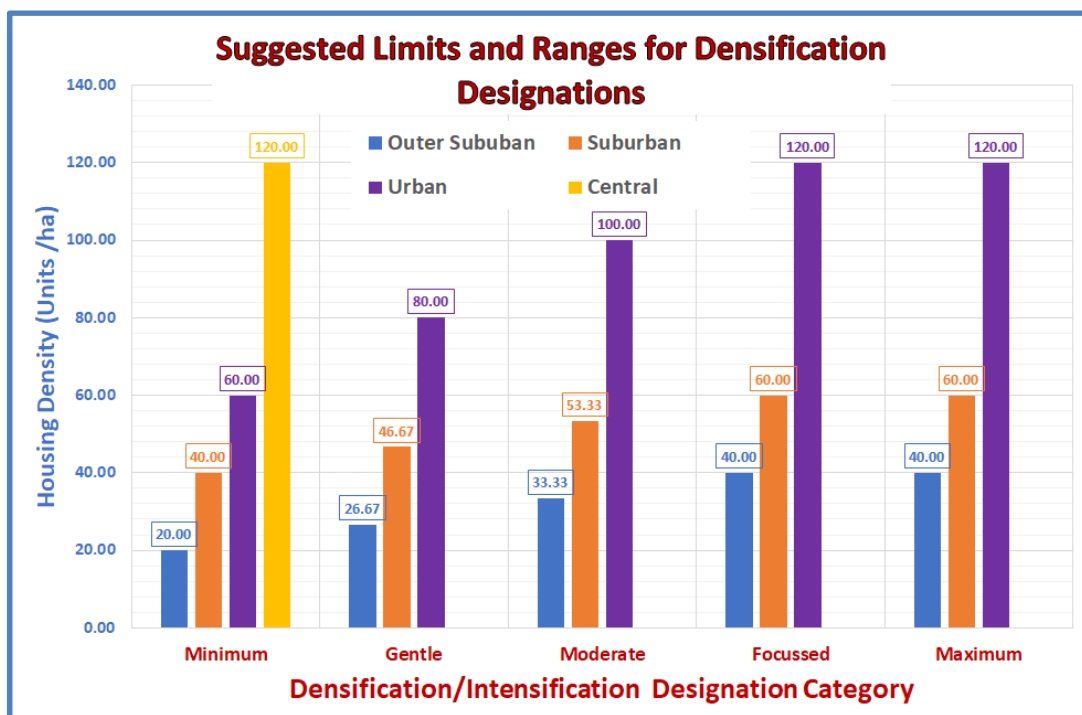
- a) Areas of **Focused Intensification** are areas where a step change of character to higher density forms of development around transport nodes and existing services will take place.
- b) **Moderate Intensification** – are areas where density will be increased, whilst respecting existing character, in locations where access to local transport and services is good.
- c) Evolution and **gentle densification** will be supported across all other residential areas.

4.2.1 **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.

4.2.2 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)**.

4.3 Assessment for evolution & regeneration

4.3.1 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**.

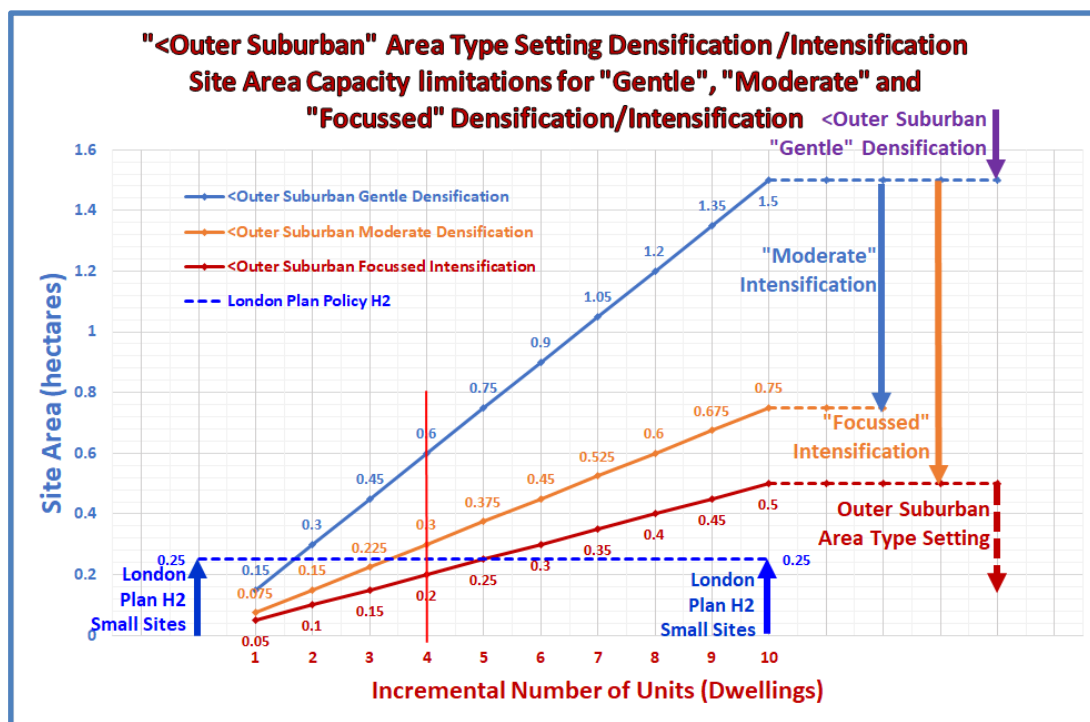


Suggested ranges for Gentle Moderate and Focussed intensification to remain within infrastructure limitations of the Setting and Area Type

- 4.3.2 We have shown in the above **Graphical Illustration**, an **incremental** increase in **Design Code Density** of $\frac{1}{3}$ (33%) **“Gentle”** & $\frac{2}{3}$ (66%) **“Moderate”** between Settings for **“Outer Suburban”**, **“Suburban”** and **“Urban”** for **“Gentle”**, **“Moderate”** and (100%) 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, to ensure **sustainability** of the developments as there is no **‘meaningful’ guidance** in the **Croydon Revised Local Plan** or the **London Plan**.
- 4.3.3 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**.
- 4.3.4 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**.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.

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

- 4.3.5 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**.
- 4.3.6 Using the same principles for **<Outer Suburban Area Type Settings** as other Area Type Settings, the **"Gentle" Density** for **46 The Glade**, with a **PTAL of Zero** and a **"Site Capacity"** limitation of **0.102ha**, should **NOT** exceed a **Post Code Housing Density** for an **Area Type <Outer Suburban** of **>≈6.67Units/ha Gentle Density** i.e., $((20-0)/3)$, but it actually reaches $4/0.102 = 39.22u/ha$.
- 4.3.7 These increases are the percentages **above** the **"Gentle" densification** suggested at **6.67U/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**.
- 4.3.8 The **Site Area** required for **4 Dwellings** for Area Type **<Outer Suburban** would therefore be **0.6ha** whereas the available **Site Area** is **0.102ha** showing the proposal is an over development for the available **Site Capacity** by **488.23%**.



**<Outer Suburban Densification/Intensification Site Area Capacity and
Site Area/Dwelling.**

5 London Plan Policy H2 – Small Sites

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

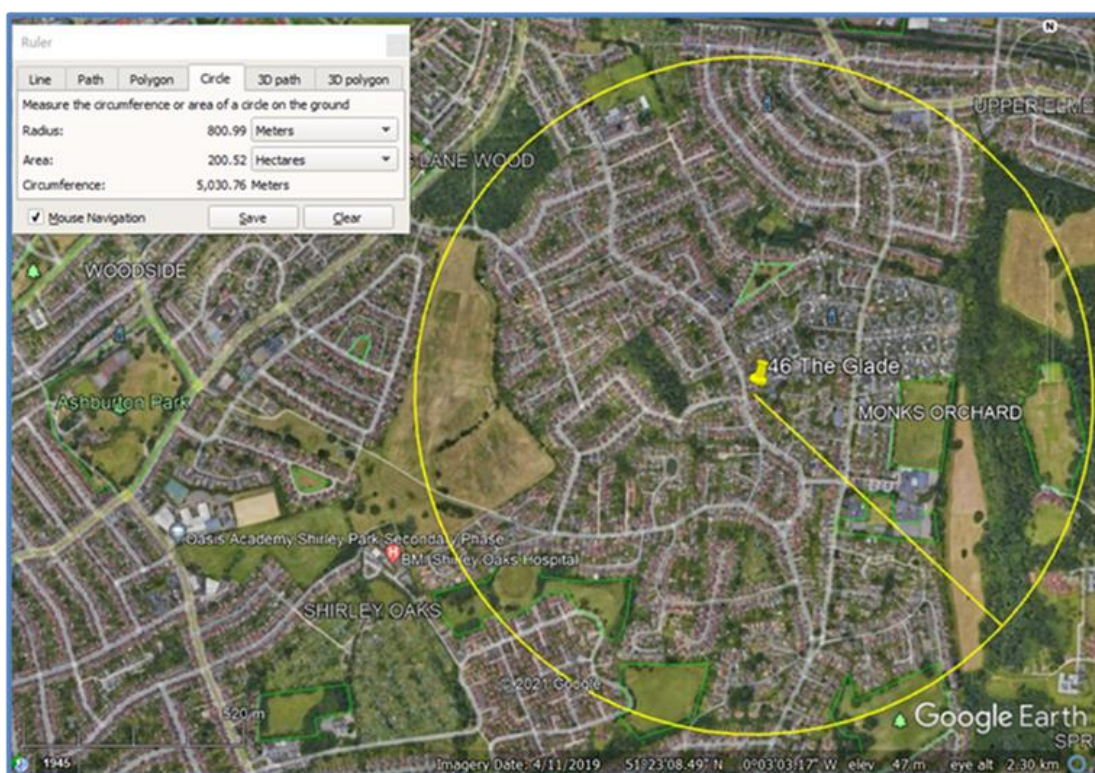
*“The small sites target represents a **small amount** of the potential for **intensification** in existing **residential areas**, particularly in **Outer London**, therefore, they should be treated as minimums. To proactively increase housing provision on small sites through ‘**incremental**’ development, 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 London Plan Policy 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**⁹ or **town centre**¹⁰ boundary ...”*

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 London Plan Policy H2 at para 4.2.4:



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.

⁹ Tube, rail, DLR or tram station.

¹⁰ District, major, metropolitan and international town centres.

5.2.3 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”**.

5.2.4 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**.

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

5.3.1 **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.

5.3.2 As there is no possibility of **infrastructure improvement** 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.

6 Parking & Accessibility

6.1 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 where only 5 spaces are provided.

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

7 Sustainability and Housing Need

7.1 NPPF Para 7 States:

7.1.1 *"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**"¹²*

7.1.2 For **Sustainability**, developments require adequate **supporting infrastructure** but there is **NO planned improvement** in the provision or delivery of new improvements to the existing Infrastructure¹³ for **Shirley** over the life of the Plan.

7.2 Housing Need

7.2.1 The allocation of housing **"need"** assessed for the **"Shirley Place"** [770ha] over the period **2019 to 2039** is **278** (See Croydon Revised Local Plan¹⁴ 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:

7.2.2 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.')

7.2.3 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**.

7.2.4 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"***

7.2.5 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**

¹² Resolution 42/187 of the United Nations General Assembly

¹³ <https://www.croydon.gov.uk/sites/default/files/2022-01/infrastructure-delivery-plan-2021.pdf>

¹⁴ <https://www.croydon.gov.uk/sites/default/files/2022-01/croydon-local-plan-2018-revised-2021-part-1-start-to-section-11.pdf>

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**.

7.2.6 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 the **Target** for the Shirley "Place" of **278** by **442 Dwellings** i.e., for the 'Whole' of the Shirley "Place".

7.2.7 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).

7.2.8 This is $|278 - 1257.5|/278 = 979.5/278 = 3.5234 = 352.34\%$ Increase for the Shirley "Place" estimate when the **MORA Area** is only $(770-178.2)/178.2 = 23.15\%$ of the area of the estimated Shirley 'Place' and $(178.26-715.2)/715.2 = 24.92\%$ of all Shirley. *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.

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

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**

- 7.2.10 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 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**).
- 7.2.11 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

- 7.2.12 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.**
- 7.2.13 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** ¹⁵ as Shirley has no prospect of infrastructure improvement over the life of the Plan. The **Sustainability of Developments** is a **legal requirement** ¹⁶ of development approvals.
- 7.2.14 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.”**

¹⁵

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

¹⁶ <https://www.legislation.gov.uk/ukpga/2004/5/section/39>

8 Summary

- 8.1 This development proposal is an improvement on the previous proposals for this Site to reflect the Hipped Roof forms prevalent in the neighbourhood and thus relieving the 45 Degree Rule amenity to adjacent dwellings; in doing so this has reduced the two end terraces to two stories and thus reduced the residential density and occupancy ratio of the development.
- 8.2 However, the proposed development remains to be an over development for the Site **Area Type** of **<Outer Suburban** and would be more appropriate for an **Area Type Outer Suburban** for **Housing Density** and for an **Area Type Urban** for **Residential Density**.
- 8.3 The increase required would not be supported by the existing infrastructure which is currently adequate for **Area Type <Outer Suburban** as established by the assessment of the **Post Code CR0 7QD Area Type Design Code**, nor would the **Public Transport Accessibility** required to support the Residential Density of **2.79** be achieved as the **PTAL** for this locality is **Zero** and there is no prospect of improvement over the life of the Plan.
- 8.4 The minimum Internal Space Standards required of the London Plan Table 3.1 are not met in terms of In-Built Storage.
- 8.5 Consequently, the proposed development fails to meet the Design Code of the locality as defined by the National Model Design Code & Guidance and would result in a harmful effect on the character and appearance of the area. As such, in this respect, it would be contrary to the NPPF Design Codes, the London Plan Policies on Design and the Croydon Plan Policies SP4 and DM10. Together these Policies seek to achieve high quality design which respects local character.

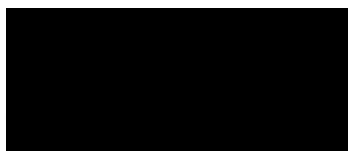
9 The Planning Process

- 9.1 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.
- 9.2 We 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”** with fully justifiable supporting 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**.
- 9.3 The December 2022 consultation on reforms to the NPPF, includes further clarification on how housing targets are derived, delivered and monitored. It seeks to give greater flexibility to responding to local circumstances and the promotion of character over density. This is highlighted in the PAS Report.

- 9.4 Local Residents have ***“lost confidence in the Planning Process”*** resultant on recent local **over-developments** and the lack of any additional supporting **infrastructure**, which, in the majority of cases, disregarded Planning Policies. Once that confidence is **lost**, it is extremely difficult to regain it.
- 9.5 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 **fully comply** with the agreed **National and Local Planning Policies and Guidance**.
- 9.6 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**, supported by the **Regional** (London) and **Local** (Croydon) adopted and emerging **Local Plans**.
- 9.7 Please Register this representation as **Monks Orchard Residents’ Association (Objects)** on the Public Access Register.

Kind regards

Derek



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Cc:

Sarah Jones MP

Cllr. Sue Bennett

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Croydon Central

Shirley North Ward

Shirley North Ward

Shirley North Ward

Bcc:

MORA Executive Committee, Local affected Residents & Interested Parties