

To: Mr Christopher Grace Case Officer
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**Monks Orchard Residents'
Association
Planning**

2nd March 2023

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Reference:	23/00231/FUL
Application Received:	Thu 19 Jan 2023
Application Validated:	Thu 19 Jan 2023
Address:	211 Wickham Road Croydon CR0 8TG
Proposal:	Demolition of existing structures to the rear of 211 Wickham Road and erection of a two-storey building containing four dwellings (1 x 3 bed and 3 x 1 bed flats) with associated parking and refuse storage.
Status:	Awaiting decision
Consultation Expiry Date:	Sun 05 Mar 2023
Determination Deadline:	Thu 16 Mar 2023
Case Officer:	Christopher Grace

Dear Mr Grace

The difference between Application Ref: 22/03145/FUL and 23/00231/FUL is the modifications to the First Floor Layout accommodation Flats 3 & 4 to include Balconies, and the peripheral Car & Cycle Parking, Refuse and Amenity Space provisions. Therefore, the majority of the Application Reference 22/03145/FUL comments still pertain.

It is understood that Planning Policy given in Supplementary Planning Document SPD2 has been revoked and therefore cannot be used for assessing development proposals.

We therefore assess this proposed development against the **NPPF**, The **National Model Design Code & Guidance** (2021), The **London Plan** (2021) and the adopted **Croydon Local Plan** (2018) with guidance from the emerging **Revised Croydon Local Plan** (2021).¹

1 Constraints

- 1.1 Name: Settings of **Shirley Local Centre** and **Shirley Road Neighbourhood Centre**
Area of **Focussed Intensification**
(Note: the emerging ² (Para 48) **Revised Croydon Plan** removes this designation from the **Shirley Local Centre**)

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

²

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

Area: 3272296 Flood Risk 1000yr Surface Water
Diameter: 12 Gas Pipes Low Pressure
Diameter: 125 Gas Pipes Low Pressure
Local Centre: **Shirley Local Centre, Primary Shopping Area.**

Site Area on Application form 0.03ha

Site Area state on Proposed Block Plan 324sq.m.= 0.0324ha

(Therefore, the **Site Area 0.0324ha** is used for all assessments as the most accurate offered parameter and provides greater **Site Capacity** assessment).

1.2

Proposal Parameters:

211 Wickham Road				Ref: 23/00231/FUL			Post Code CR0 8TG				
Units		4		Residential Density	216.05	bs/ha	Floor Area Ratio (FAR)	0.58			
Site Area		324	sq.m.	Residential Density	262.35	hr/ha	Building Footprint	135.10	sq.m.		
Site Area		0.0324	ha	Housing Density	123.46	u/ha	Plot Area Ratio	0.42			
	Floor	Bedrooms (b)	Bed Spaces (bs)	Habitable Rooms (hr)	GIA Provided (D&A)	GIA Required (Table 3.1)	Built-In Storage Provided (**)	Built-In Storage Required (Table 3.1)	Private Amenity Space Provided	Private Amenity Space Required	Car Parking
Flat 1	Ground	3	4	4.0	74.3	74	3.4	2.5	37.3	7.0	3
Flat 2	First	1	1	1.5	38.2	37	1.0	1.0	15.4	5.3	
Flat 3	Ground	1	1	1.5	37.0	37	1.6	1.0	20.8	5.0	
Flat 4	First	1	1	1.5	38.2	37	1.0	1.0	15.4	5.3	
Total		6	7	8.5	187.7	185.0	7.0	5.5	88.9	23	3
(*)	Flats 1 & 3 Built-In Storage 1.6sq.m. Under Stairs would have height limitations.								PTAL	2	2011
(**)	Flat 3 Built In Storage not fully defined (Space indicated but area not specified)								PTAL	2	2031
Site Area	As stated on Proposed Block Plan Drawing No. 02/D										

2 Initial Observations

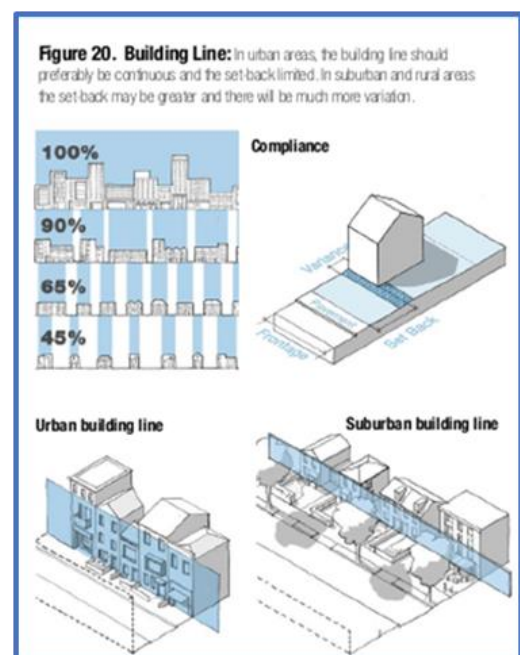
2.1 Building Line Set-Back

2.1.1 The proposed development is a continuation of **Ridgemount Avenue** which has a **Building Line** following the curve of **Ridgemount Avenue Set-Back of ~7metres**. The Corner side return **Set-Back** at **Wickham Road** is approx. **2.6metres** but this set-back only applies to Buildings **fronting** **Wickham Road**. Therefore, the proposal **does not follow** the established **Suburban Building Line Set-Back** of **Ridgemount Avenue**.

2.1.2 National Model Design Code Guidance – Building Line and Set Back

2.1.2.1 The **National Model Design Code** Part 1 Build Form at vii) Building line States:

*“The building line is created by the **primary front face of buildings along a street** and is a **key element of design codes**. **New developments should follow the established building line where it exists**. Where there is no building line (for example on the periphery of a town centre or a development site), codes should set one. Coding for building lines can include:*



- *Variation: The extent to which buildings can be set forward or back from the line.*
- *Projections: Allowance for elements such as balconies.*
- *Compliance: The percentage of the building line that should be occupied by development.*
- ***Set-Back:** The distance that buildings are set back from the pavement."*

2.2 Croydon Local Plan (2018) & Revised Draft Croydon Local Plan.

2.2.1 The current adopted **Croydon Local Plan** has no guidance on the appropriate **Building Line Set-Back**. Similarly, the **Revised Croydon Local Plan** has no guidance on the appropriate **Set-Back** or **Building Line** of proposed developments.

2.3 London Plan

2.3.1 There is no mention of **Set-Back** or **Building Line** requirement in the **London Plan** (March 2021).

2.4 National Planning Policy Framework (NPPF)

2.4.1 The **NPPF** also has no guidance on the appropriate **Set-back** or **Building lines** of development proposals. However, **NPPF para 128 & 129** references out to the **National Model Design Codes & Guidance**.

2.5 National Model Design Codes & Guidance.

2.4.1 Thus, the **National Planning Framework (NPPF) Policy Guidance** is the only available guidance on Building Line and Set Back as published by the **Department for Levelling Up Communities and Housing** (DLUCH) in January 2021 and updated in June 2021. Thus, this **National Guidance** is recent and relevant **guidance for this proposal** and gives a fundamental reason for a **refusal**.

3 Shirley Local Centre Assessment

3.1 Croydon Local Plan (2018)

3.1.1 Policy DM10.11 States:

DM10.11 In the locations described in **Table 6.3** and shown on the Policies Map as areas of **focussed intensification**, new development may be significantly larger than existing and should;

- Be up to double the predominant height of buildings in the area
- Take the form of character types "Medium-rise block with associated grounds", "Large buildings with spacing", or "Large buildings with Continuous frontage line"
- Assume a suburban character with spaces between buildings.

3.1.2 Developments in focussed intensification areas should contribute to an increase in density and a gradual change in character. They will be expected to enhance and sensitively respond to existing character by being of high quality and respectful of the existing place in which they would be placed.

3.1.3 However, it is unclear how the **"Focussed Intensification"** Policy could be applied as the policy is unspecified and undefined and does NOT take account of whether an increase in 'intensification' of residential density would be supported by the available **infrastructure**.

3.2 Revised Croydon Local Plan (2021)

3.2.1 The emerging **Revised Croydon Local Plan** omits the **“Focussed Intensification”** at this location of the **Shirley Local Centre** due to **limited local infrastructure**, with the presumption that there would probably not be any **Infrastructure improvement** for **Shirley** over the life of the **Plan 2019 to 2039**.

3.2.2 The revised Croydon Local Plan Policy on Intensification and Densification is set out at **SP1.0C**.

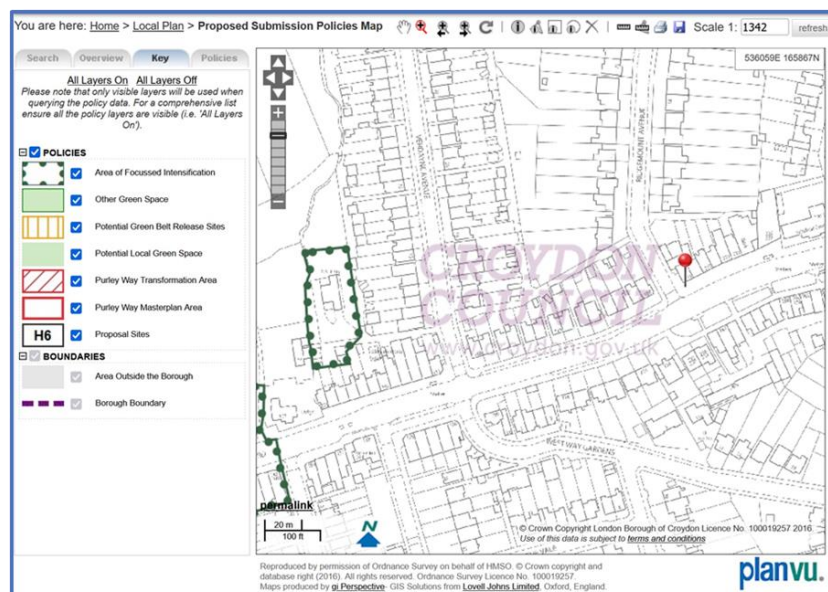
SP1.0C There are residential areas where the characteristics and infrastructure provision have led to the identification of potential for sustainable housing growth and renewal.

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

3.2.3 **Local Planning Authority Service Transformation** Section 6. THE PLANNING TRANSFORMATION PROGRAMME STRUCTURE AND WORKSTREAMS.

3.2.3.1 The key component of the **LDF programme** is the review of the local plan workstream and will be overseen by the **LDF Board**, which will report to the Planning Transformation Board. The review of the **Local Plan** will seek to **remove intensification zones**, support sustainable development, and emphasise **design and character over density**.

3.2.4 **Revised Croydon Local Plan Policies Map.**



The Revised Policies Map clearly shows that 211 Wickham Road is NOT now considered within an “Intensification” designated Area.

3.2.5 Shirley Local Centre

11.213 Shirley Local Centre consists of the combination of three different character types: an 'Urban Shopping Area', 'Scattered Houses on Large Plots' and a 'Suburban Shopping Area'. The northern side of the Local Centre is more tightly built-up, while the southern side is more spacious with green verges, tree lined streets and parking within slip roads. In this area the potential for growth is limited. The area includes a number of locally listed buildings. The setting, heights and other characteristics of these buildings should be respected.

3.2.6 Shirley Road and Wickham Road

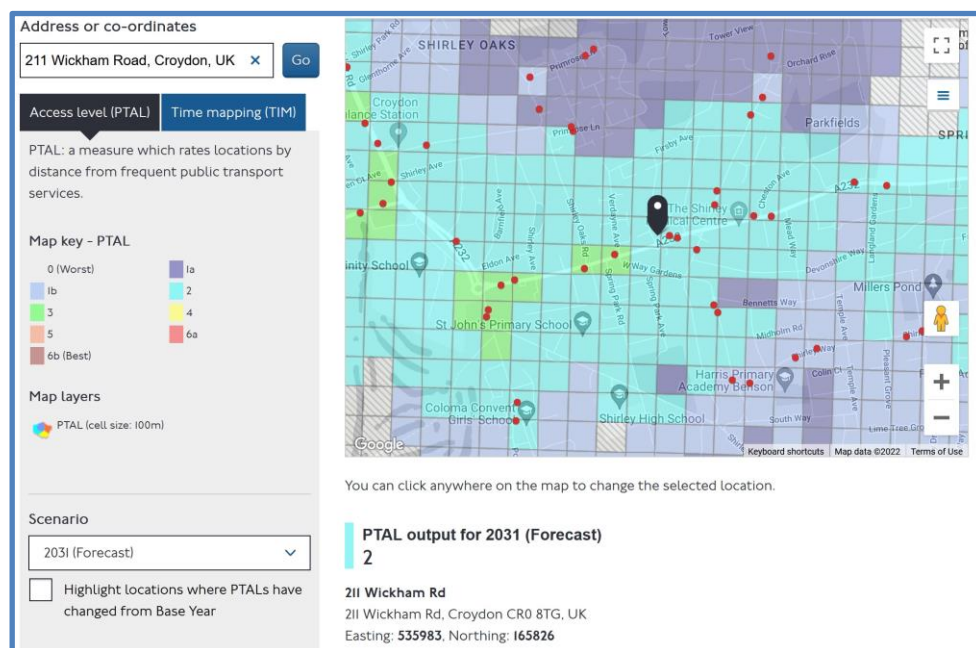
11.214 Each of Shirley's shopping areas has a distinct character which should be enhanced and strengthened. This character is informed by the layout, scale, urban grain and architectural features such as the brick-work, fascia's and stall rises. In order to ensure that the distinctive elements that contribute to Shirley's sense of place are not lost, these features have been included in the detailed policies.

3.2.7 Policy DM45: Shirley

DM45.1 Within Shirley Local Centre, to retain the unique qualities development should:

- Retain the continuity of ground floor active frontages and allow flexibility at first floor and above for mixed use;
- Reference, respect and enhance architectural features such as the consistent rhythm and articulation of fenestration and retain features such as the triangular bay windows;
- Complement the existing predominant building heights of 2 storeys up to a maximum of 4 storeys;
- Incorporate or retain traditional shop front elements such as fascia's, pilasters and stall risers; and
- Respect the setting of locally listed buildings within the area.

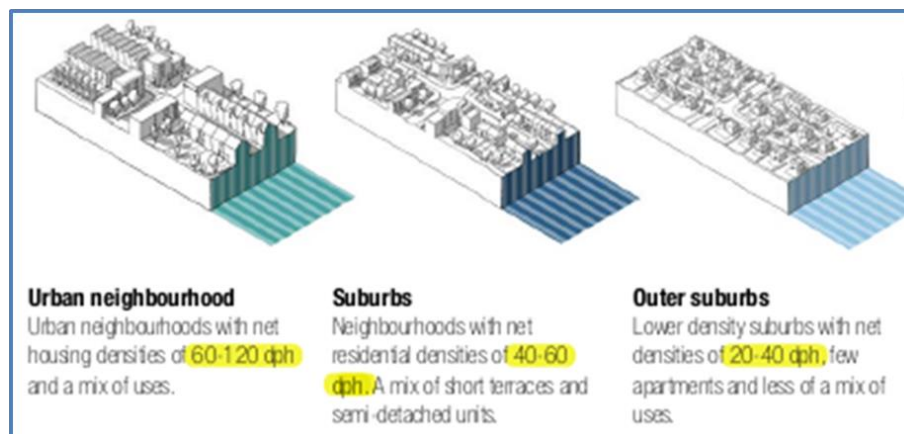
3.2.8 TfL Public Transport Accessibility Level (PTAL)



TfL Public Transport Accessibility Level (PTAL) at 211 Wickham Road.

4 Design Codes & Guidance

- 4.1 The **Croydon Local Plan (2018)** does NOT provide any guidance on the assessment of local **Design Code Assessment**.
- 4.2 The **Revised (Draft) emerging Croydon Local Plan** also does NOT provide any guidance on the assessment of **local Design Code Assessment**.
- 4.3 The **London Plan Policies at Policy D3 – Optimising Site Capacity through the Design Led Approach, Policy D4 – Delivering Good Design and Policy H2 – Small Sites**, recognise the need for the implementation and assessment by ‘**Design Codes**’ but does NOT give any guidance or methodology how that should be achieved.
- 4.4 The **National Planning Policy Framework (NPPF)** does give guidance by referencing out to documents produced by the **Department for Levelling Up, Homes & Communities (DLUHC)** viz: **National Model Design Code and Guidance**.³



Extract from the National Model Design Code & Guidance “Built Form” for Area Types “Outer-Suburban,” “Suburban” & “Urban” Neighbourhoods.

4.4.1 NPPF Paras 128 & 129

128. To provide maximum clarity about design expectations at an early stage, **all local planning authorities** should prepare **design guides or codes** consistent with the principles set out in the **National Design Guide and National Model Design Code**, and which reflect local character and design preferences. **Design guides and codes** provide a local framework for creating beautiful and distinctive places with a consistent and high-quality standard of design. Their geographic coverage, level of detail and degree of prescription should be tailored to the circumstances and scale of change in each place and should allow a suitable degree of variety.
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**

³ <https://www.gov.uk/government/publications/national-model-design-code>

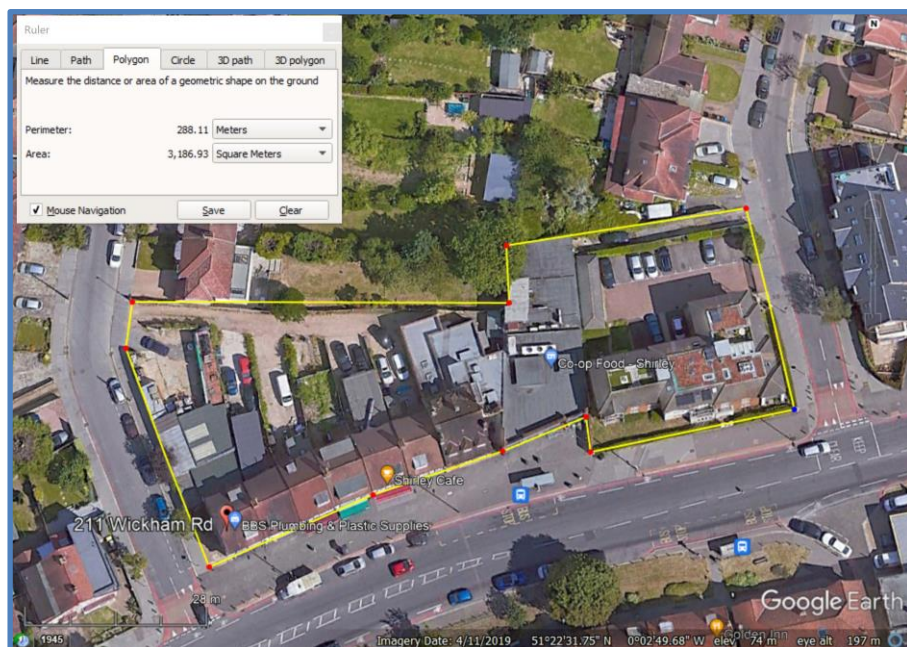
Code. These national documents should be used to guide decisions on applications in the absence of locally produced design guides or design codes.

- 4.4.2 As there is absolutely no guidance provided in either the adopted **Croydon Local Plan** or the **Revised Croydon Local Plan**, or the **London Plan (2021)**, therefore the **National Model Design Code & Guidance (2021)** as published by the **Department for Levelling Up, Communities & Housing (DLUCH)** should be used. This guidance is referenced from the **NPPF para 129** for local planning proposals and ***“should be used to guide decisions on applications in the absence of locally produced design guides or design codes.”***

5 Area Type Design Code Assessment

The assessment of the **Local Area** to define the **Local Design Code** requires an analysis of the locality which will provide appropriate parameters to use for defining the **Local Design Code detail**. The simplest analogy is to assess the **Post Code Area** for such an assessment.

- 5.1 The Post Code Area has been assessed roughly from Google Earth.



Google Earth Image of Post Code CR0 8TG assesses Area of 3,186.93 sq.m.

- 5.1.2 The following analysis and table is of the **Post Code Area CR0 8TG** within the **Shirley Local Centre Area**. This analysis is **conclusive evidence** that the **Shirley Local Centre** is definitely an **“Outer Suburban” Area Type Setting** as Defined in the **National Model Design Code and Guidance**.
- 5.1.3 The local **Post Code CR0 8TG** has a population of **17⁴** in an Area of **3,187m² ≈ 0.3187ha** and **8 dwellings** from **211a Wickham Road** to **223a Wickham Road**.⁵

⁴ <https://www.postcodearea.co.uk/>

⁵ <https://www.gov.uk/council-tax-bands>

5.2 Post Code CR0 8TG Design Code Assessment

National Model Design Code Parameters of Post Code CR0 8TG					
Area Design Code Parameter		Input Parameters			
(These parameters auto calculated Design Code)				Constrains	
Post Code	CR0 8TG			Ward	Shirley North
Area of Post Code (ha)	0.3187	hectares		Flood Risks	1000yr Flood Risk
Area of Post Code (Sq.m)	3186.93	sq.m.		Gas Pressure	Low Pressure
Number of Dwellings (Units) (*)	8	Units		Water Pressure	N/A
Number of Occupants (Persons)	17	Persons		HASL (m)	67m
Post Code Housing Density	25.10	Units/ha		Building Line Set-Back	≈7m (Ridgmount Ave)
Post Code Average Occupancy	2.13	Persons/Unit			
Post Code Residential Density	53.34	Bedspaces/ha			
Post Code Area Type	Outer Suburban	Area Type Setting			
(*) Last updated on 19 February 2023					
National Model Design Code Parameters		Min	Max	Measure	
Area Type (Outer Suburban, Suburban or Urban)	Outer Suburban	20	40	Units/ha Range	
Equivalent Residential Density (Persons/ha)	Outer Suburban	47.2	94.4	Persons/ha Range	
(Base on Statista National Average in 2021 = 2.36)					
"Growth"		U/ha	bs/ha		
Gentle Intensification (33%)	(U/ha & bs/ha)	26.67	62.93	Limits Intensification	
Moderate Intensification (66%)	(U/ha & bs/ha)	33.33	78.67	Limits Intensification (Innapropriate)	
Focussed Intensification (100%)	(U/ha & bs/ha)	40.00	94.40	Limits Intensification (Innapropriate)	
PTAL (now)	2.00	53.33	125.87	Limits for PTAL	
PTAL (forecast 2031)	2.00	53.33	125.87	Limits for PTAL	
PTAL Required to Support Residential Density	0.16		53.34	Limits for Area Type	Outer Suburban

Assessment of local POST CODE Area Types Settings

5.3 Application Assessment.

Application Design Code Parameters					
Application Details			Calculated Assessments:		
Appeal Application	Ref: 23/00231/FUL		Housing Density	123.46	Units/ha
Address:	211 Wickham Road		Residential Density	216.05	bs/ha
Appeal Reference:			Residential Density	277.78	hr/ha
Post Code:	CR0 8TG		Floor Area Ratio	0.58	#
			Plot Area Ratio	0.42	#
			Occupancy	1.75	
Input Parameters			National Model Design Code:		
Site Area (sq.m.)	324.00	sq.m.	Area Type Setting (Units/ha)	Central	120.00 >120
Site Area (ha)	0.0324	hectares	Area Type Setting (Bedspaces/ha)	Urban	141.60 283.20
Units (Dwellings)	4	Flats			
Bedrooms	6	br	Public Transort Accessibility:		U/ha bs/ha
Bedspaces	7	bs	PTAL (Current)	2.00	>6 188.80
Habitable Rooms	9	hr	PTAL (Forecast)	2.00	>6 188.80
Number of Floors/Dwelling	1	#	PTAL To Support Residential Density	4.29	
Gross Internal Area (GIA) Offered	187.70	sq.m.			
Gross Internal Area (GIA) Required	185.00	sq.m.	Intensification:		Cental Urban
Building Line Set-Back	Challenged	metres	Gentle Intensification	33%	>120 188.80
Footprint Area	135.10	sq.m.	Moderate Intensification	66%	>120 236.00
			Focussed Intensification	100%	>120 283.20

Assessment of Proposed Application Design Code Parameters

5.4 Design Code Assessment Comparisons – Post Code & Application.

Difference between Post Code & Proposed Application (Design Codes)					
Post Code Housing Density	25.10	U/ha	Area Type Setting	Outer Suburban	
Application Housing Density	123.46	U/ha	Area Type Setting	Central	
Percentage (Increase)	391.87%				
Post Code Residential Density	53.34	bs/ha	Area Type Setting	Outer Suburban	
Application Residential Density	216.05	bs/ha	Area Type Setting	Urban	
Percentage (Increase)	305.04%				
Post Code Required PTAL	0.16				
Application Required PTAL	4.29				
Post Code Intensification		Application Intensification		Central	Urban
		U/ha	bs/ha	U/ha	bs/ha
Gentle Intensification (33%)	33.00%	26.67	62.93	33.00%	>120 188.80
Moderate Intensification (66%)	66.00%	33.33	78.67	66.00%	>120 236.00
Focussed Intensification (100%)	100.00%	40.00	94.40	100.00%	>120 283.20

Comparison of Post Code Design Code Area Types with the proposed Application Parameters

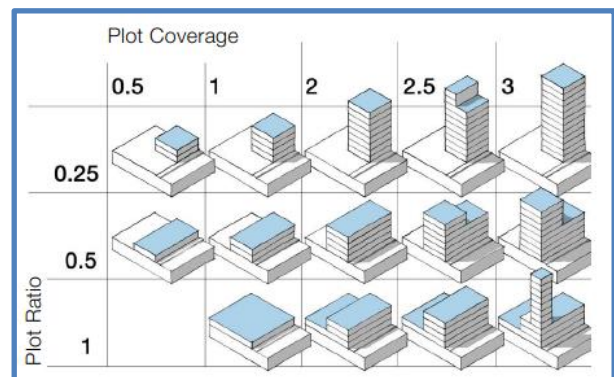
5.7 Assessment and analysis by the **National Model Design Code** as referenced from the **NPPF**, which is the highest in the **Planning Policy Hierarchy** clearly indicates that the **Site Area** of the proposed development of **4 Dwellings** at an **“Outer Suburban” Area Type** should be within the range of **0.1ha to 0.2ha** when the available **Site Area** is **0.0324ha**, which for **4 units** is more appropriate in a **“Central” Area Type Setting (<0.033)** than the actual **“Outer Suburban” Area Type Setting** of the **Shirley Local Centre**. This is conclusive evidence of **Over Development** for the **“Site Capacity”** of **0.0324ha** in an **Outer Suburban** Setting at **PTAL 2**.

5.8 **London Plan Policy D3 - Policy D3 Optimising site capacity through the design-led Approach**, requires 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. The **“Attributes”** are the **Number of Dwellings**, the **Site Area** and **Area Type Setting**.

6 Floor Area Ratio and Plot Footprint Ratio

6.1 The **National Model Design Code & Guidance Part 2** indicates the **Built Form** further required limitations of density at Para 29.

29. **Plot Ratio and Plot Coverage:** The former is the ratio between site area and the total building floor area while the latter is the proportion of the site area occupied by buildings. These two measures can be combined to **control development** and should be used alongside good urban design principles. For instance, a Plot Ratio of 2 means that the floor area can be twice the site area while a Plot Coverage of 0.5 **means that only half of the site area can be developed**.



6.2 **Plot Ratio or Floor Area Ratio = GIA/Site Area**

The **National Model Design Code Guidance** at **“Built Form”** Para 52 ii (page 20) states:

ii Plot Ratio: Calculated by dividing the gross floor area of the building by the area of the plot, plot ratios along with site coverage should be used alongside good urban design principles to regulate the density of mixed-use and non-residential uses (example below) See B.1.i Density

- Town Centres: Plot Ratio >2
- Urban Neighbourhoods: Plot Ratio >1
- Suburbs: Plot Ratio <0.5

6.3 **Plot Ratio or Floor Area Ratio = GIA/Site Area**

The proposed development has a site area of **324m²** as indicated on the proposal Application Form and the offered **Gross Internal Area** of **187.7m²** equates to a **Floor Area Ratio** of $187.7/324 = 0.579$. this Exceeds the Less than (<) **0.5 guidance** by a **Percentage increase of** $= |0.5 - 0.579|/0.5 = 0.007/0.5 = 0.158 = 15.8\%$ which at these low figures is a **significant increase**.

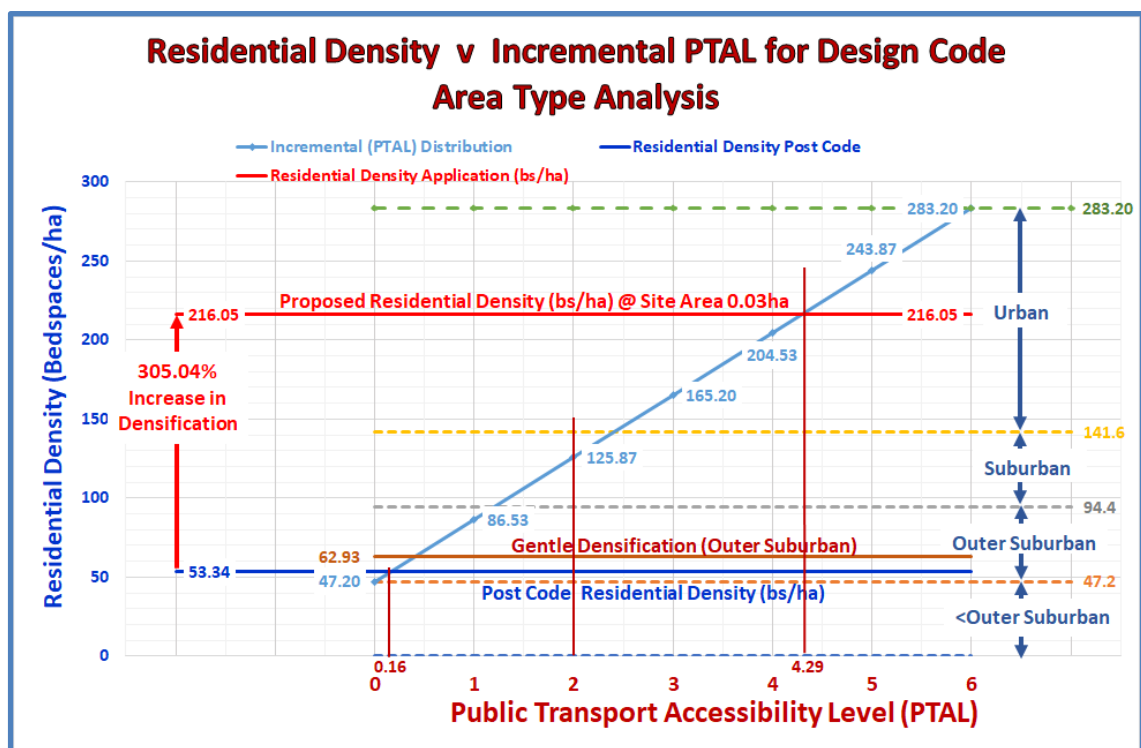
7 Residential Density and Public Transport Accessibility

7.1 It is surely people who require supporting infrastructure and accessibility to **Public Transport Services** rather than 'Habitable Rooms' and therefore the appropriate parameter for **Residential Density** is 'persons per hectare' – NOT Habitable Rooms per hectare. The preferred parameter is therefore **bedspaces per hectare** as shown in the parameter Table at the head of this formal representation.

7.2 The **Application Form** for this proposal at **211 Wickham Road** states that the **Site Area** is **324sq.m.** equivalent to **0.0324ha**. The **Residential Density** as calculated from the **Application Form** is **7 persons** $7/0.0324\text{ha} = 216.049 \approx 216.05\text{bedspaces/ha}$.

7.3 Required Public Transport Accessibility Level (PTAL).

7.3.1 It is presumed that the **Area Type** as defined by the **National Model Design Code & Guidance** at the **low value of the Density Range** would be of **Lower PTAL** and the **Higher of the Density Range** at the **Higher PTAL**. Assuming this to be the objective, the distribution over the lower and higher Ranges should incrementally increase approximately linearly from **Zero** through to a **PTAL** of **6** as defined by **TfL**.



The Proposed Residential Density (bs/ha) increase of 305.04% from Outer Suburban through Suburban to Urban would require a Public Transport Accessibility Level (PTAL) of 4.29 when the available PTAL is Level 2.

7.4 The assessment of **Housing Density** in the **National Model Design Code & Guidance** are **National** figures and therefore a **National** figure for **Residential Density** in occupants per unit would be an appropriate conversion from **Housing Density** to **Residential Density**. As there is no guidance in any **Local Plan** for this assessment, we can use the **National Statista** latest average occupancy of households in the UK in 2021 at **2.36**.

7.5 Area Type Setting Public Transport Accessibility Level (PTAL) Required

7.5.1 Conversion from Housing Density to Residential Density using the **Statista⁶** National conversion factor of **2.36 persons/unit** (2021).

7.5.2 The graphical illustration (above) provides an assessment of the required **PTAL** to support the proposed development in terms of habitable rooms per hectare (hr/ha) and **bedspaces per hectare (bs/ha)**, assuming a 'linear' incremental increase over the **PTAL ranges 0 through 6**, across the **Setting** from **low Density** to **high density** of the **Area Type Range**.

7.5.3 The Area Type Setting at **211 Wickham Road** is presumed to be "**Outer Suburban**" for a **TfL assessment of connectivity** but the **Density in terms of bedspaces per hectare** at **216.05bs/ha** is within the **mid-range** of an **Urban Area Type Setting** and would require a **PTALs** of:

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

For a **Residential Density** of **216.05 persons (bedspaces) per hectare**:

$$\therefore 216.05 = \left(\frac{283.2 - 47.2}{6} \right) * x + 47.2 \quad \therefore x = \frac{216.05 - 47.2}{39.33} = 4.293 \approx 4.29 = \text{PTAL}$$

7.5.4 The foregoing analysis indicates that the proposal at the offered **Residential Density** in terms of **persons (bedspaces) per hectare (bs/ha)** would require a **PTAL** of **4.29** when the available **PTAL** is only available at **PTAL 2** and is unlikely to be improved over the life of the Plan.⁷

7.6 Density

7.6.1 The level of densification appropriate at **211 Wickham Road** at the junction of **Ridgemount Avenue** is given at **Revised Croydon Plan Policy SP1.0C c)**.

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.

c. Evolution and gentle densification will be supported across all other residential areas.

7.6.2 However, 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 Plan (i.e., **DM10.11a - d**).

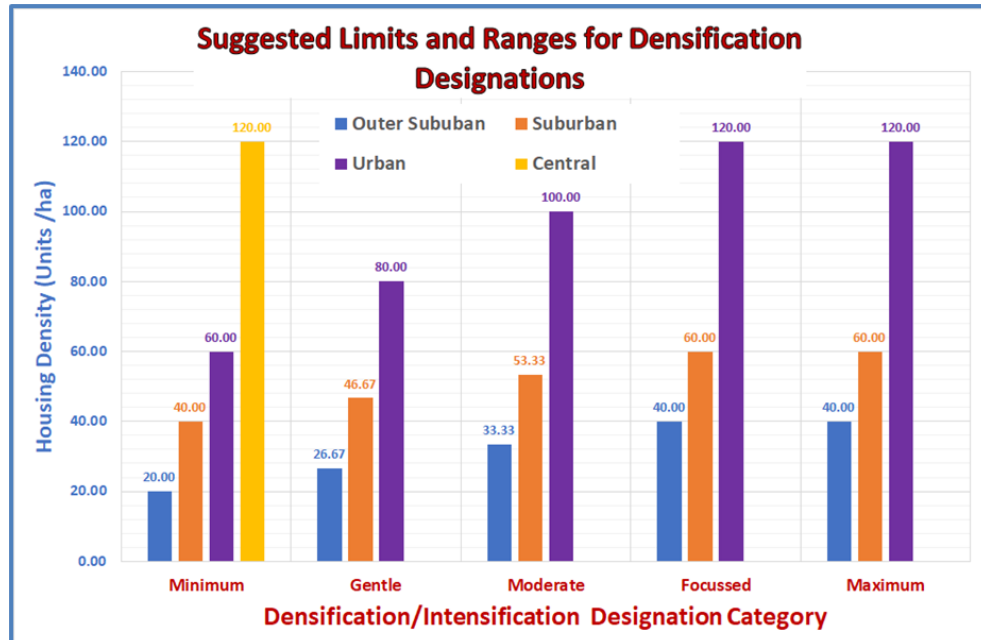
7.6.3 As the **National Model Design Code** Area Types currently rely on the **available supporting infrastructure**, unless there are programs of 'improved infrastructure' over the life of the plan, any **intensification** within an **Area Type** or **Setting** relies on that **existing Supporting Infrastructure**. Therefore the **Design Code Density densification** should **remain within** the **Setting** or **Area Type "Ranges"** as defined, in order for adequate **sustainable** developments' supporting infrastructure for the proposed development.

⁶ <https://www.statista.com/statistics/295551/average-household-size-in-the-uk/>

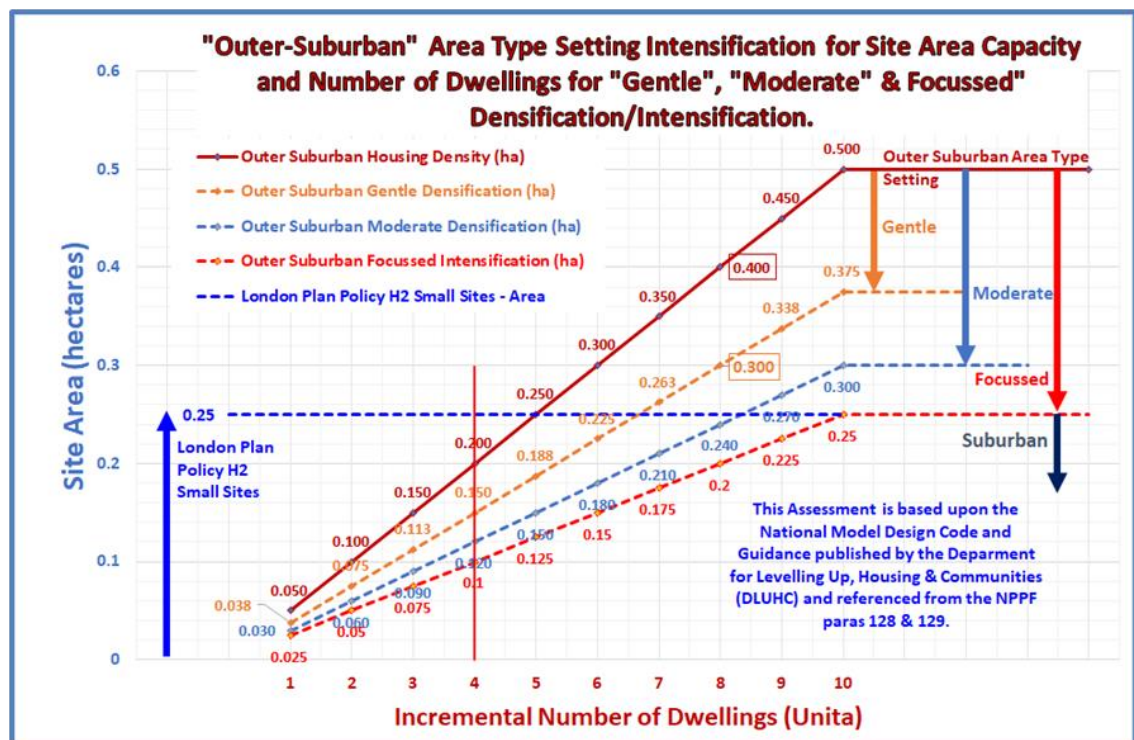
⁷ <https://www.croydon.gov.uk/sites/default/files/2022-01/infrastructure-delivery-plan-2021.pdf>

7.6.4

The following **Graphical Illustration**, shows an **incremental** increase in **Design Code Density** of $\frac{1}{3}$ & $\frac{2}{3}$ between Settings for “Outer Suburban”, “Suburban” and “Urban” for “Gentle”, “Moderate” and “Focussed” Intensification or “*densification*” as an example. This is our interpretation of the Local Plan Policy as there is no ‘*meaningful*’ **guidance** in the **Croydon Revised Local Plan** or the **London Plan**.



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

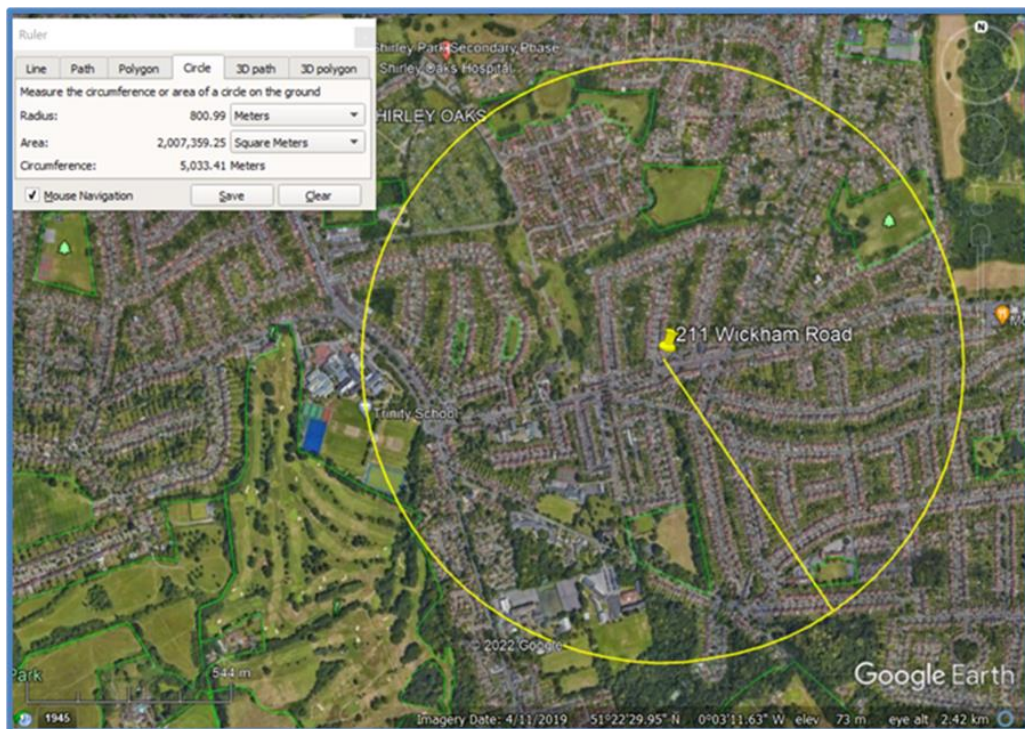


Limits of Densification/Intensification to ensure adequate infrastructure is maintained for sustainability at “Outer Suburban” Area Type Setting

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- 7.6.5 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**.
- 7.6.6 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 Principles.
- 7.6.7 Thus the proposed development at **211 Wickham Road**, with a “**Site Capacity**” limitation of **0.0324ha** and an increased “**Gentle**” **Densification** in a “**Suburban**” Setting should **NOT** exceed a **Housing Density** **>≈46.67** (i.e., $(40+(60-40)/3) = 46.67$, but it actually reaches **123.46U/ha**.
- 7.7 **London Plan “Incremental Intensification”.**
- 7.7.1 **London Plan (2021) Policy H2 – Small Sites; Para 4.2.4:**

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



Google Earth Image of Location of 211 Wickham Road exceeding 800m from any Tram/Train Station and exceeding 800m from the nearest District Centre.

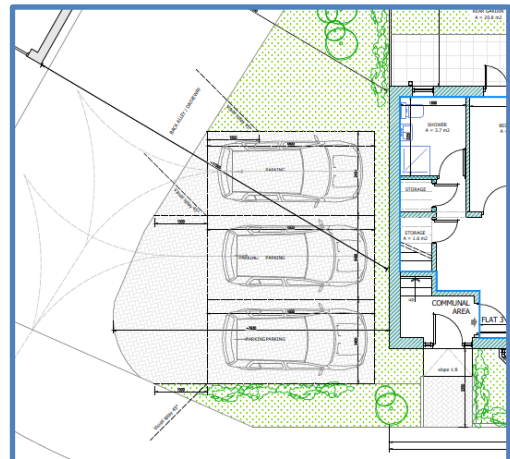
⁸ <https://www.croydon.gov.uk/sites/default/files/2022-01/infrastructure-delivery-plan-2021.pdf>

7.7.2 The Google Earth Image above illustrates that **211 Wickham Road** is greater than **800m** from any **Tram or Train Station**. **211 Wickham Road** is also greater than **800m** from the **Shirley Neighbourhood Centre**. However, the requirement is to be greater than **800m** from a “**District Centre**” and **Shirley** is a **Local Centre**, **NOT** a **District Centre**. Therefore, the location of **211 Wickham Road** is inappropriate for “**Incremental Intensification**” as defined by the **London Plan Para 4.2.4**.

7.7.3 If the Case Officer disagrees with the any of the above assessments or analysis in any respect and additionally for the assessment of “**Gentle**” *Densification*, we respectfully request that the Case Officer’s Report to officers or Committee Member, provide an explanation of the **professional appraisalment** of **Area Type Assessment** and the professional definition of “Gentle” *Densification* fully is supported by the 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**.

8 Parking

8.1 The Croydon Plan (2018) Parking provision stated at **Table 10.1** for dwellings irrespective of number of bedrooms or PTAL 2, is 1 space per dwelling which totals up to 4 spaces for the proposal. The **Revised Croydon Plan Table 10.1** states 1 to 2 Bedroom at 0.75 spaces and 1 space for 3 or more bedroom dwellings which totals **3.25** for the proposal. The **London Plan** for **Outer London** dwellings at **PTAL 2** requires 0.75 spaces space for 1 to 2-bedroom dwellings and 1 space for =>3 bedroom dwellings which again totals **3.25** for the proposal.



8.2 Therefore the provision is deficient by **0.25 Spaces**.

8.3 It should be noted that the boundary with the adjacent dwelling at **2 Ridgemount Avenue**, has a **1.8m** high, close boarded wooden fence up to the public footpath terminating with a streetlight. This has a detrimental effect of the right hand (North) sight lines when exiting the passageway.

8.4 Accepting that the vehicles are parked as shown on the plans provided, in a forward direction, and that the Access Drive is **≈4.7m** wide, it is still unclear how each would park in a forward direction and then exit from the parking bay (if all other Bays were occupied) and then exit the driveway across the footpath in a forward gear safely.

8.5 The indication on the ground floor plans shows the swept paths as a ‘**point of zero dimensions**’ rather than ‘**the physical path of a vehicle**’ and especially the **swept paths** of the **forward and rear wheels**. The depicted paths appear to assume on the first reversal, that the front wheels **jump** from **≈40°** to **≈80°** without any **manoeuvre taking place**, which is a **physical impossibility**.

- 8.6 It is suggested that proper full and effective **swept path illustrations** for **entrance** and **exit to/from each parking bay**, with all other bays occupied and avoiding any collision with the boundary fencing, **be provided for a family sized car of nominal dimensions and wheelbase**, to the case officer for examination **prior to a decision being** made as these vehicle movements would apply for the life of the development.

9 Sustainability and Housing Need

9.1 NPPF Para 7 States:

- 9.1.1 *"The purpose of the planning system is to contribute to the achievement of **sustainable** development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own **needs** ⁹... "*

- 9.1.2 For **Sustainability**, developments require adequate **supporting infrastructure**, but there is **NO planned** provision of new improvements to the existing Infrastructure ¹⁰ for **Shirley** over the life of the Plan.

9.2 Housing Need

- 9.2.1 The allocation of housing **"need"** assessed for the **"Shirley Place"** [770ha] over the period **2019 to 2039** is **278** (See Croydon Revised Local Plan ¹¹ 2021 **Table 3.1**). This equates to **≈14 dwellings per year**.

- 9.2.2 In relation to meeting housing **"need"** we raised a Freedom of Information (FOI) request **Ref: 4250621** on **31st January 2022**. The FOI Requested data on the **Outturn** of Developments since **2018** for the **Shirley "Place"** plus the **Area, Housing** and **Occupancy** of the **Shirley Place** for which the response is as follows:

- 9.2.3 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 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' as described later.

- 9.2.4 Analysis of this limited information (FOI response) supports our assumption that completions are recorded but **NOT** against the **"Places"** of Croydon and **no action** is taken by the **LPA** as a result of those completions. In addition, the **"Shirley Place" Area** **does NOT equate** to the sum of the **Shirley North & South Ward Areas**.

⁹ Resolution 42/187 of the United Nations General Assembly

¹⁰ <https://www.croydon.gov.uk/sites/default/files/2022-01/infrastructure-delivery-plan-2021.pdf>

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

9.2.5 The FOI Response indicates:

- The Council does not hold the information we requested in a reportable format.
- The Council does not know the **exact Area** in hectares of any “Place”
- The Council does not hold the **Number of Dwellings per “Place.”**
- The Council does not hold the **Number of Persons per “Place”**

9.2.6 Analysis of the recorded data shows that over the ‘three’ full years 2018 to end of 2020, the **Net Increase in Dwellings for Shirley = Shirley North Ward + Shirley South Ward** = 55 + 102 + 69 = **226 ≈ 75 per yr.** However, this is NOT The Shirley “Place” at ≈770ha but the net increase for the Shirley North [327.90ha] + Shirley South Wards [387.30ha] total of **715.20ha**, a difference of **54.8ha**.

9.2.7 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.”**

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

9.2.9 **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 2 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 on 31st Jan 2022.

9.2.10 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**.

9.2.11 This current rate (if retained) would exceed the Target over **20 yrs.** (of **278**) by: $(1507 - 278)/278 = \mathbf{442.1\%}$. 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

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means the **Target for Shirley Wards** of **278** should be reduced by **7.12% = 258** (and the difference of **20** added to the **Targets** of the relevant **adjacent Wards**).

- 9.2.12 This rate (if retained) means that the number of developments would **significantly exceed** the available **supporting infrastructure** provision which has been acknowledged as unlikely to be improved over the life of the Plan.
- 9.2.13 It is therefore plainly obvious that the **inability to contain or mitigate the excessive outturns** above the stated **Targets** is a **significant failure** to meet the **legally required objectives** of **Sustainability**¹² as defined in the **NPPF Chapter 2. Achieving sustainable development**¹³ as Shirley has no prospect of **infrastructure improvement** over the **life of the Plan**. The **Sustainability of Developments** is a **legal** requirement of **development approvals** and thus could be **legally challenged**.
- 9.2.14 We are confident that **this analysis completely refutes** any suggestion that **“Housing Need”** is a reason for approval in this locality as the assessed **‘Housing Need’ for this area has already been satisfied.**
- 9.2.15 We challenge the use of **“Place” Targets** if those Targets for each Place are **NOT monitored** or if **deviating from the requirement**, there is no **mitigating action** to **manage those Targets within sustainable limits**.
- 9.2.16 **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 or the developments are unsustainable with current supporting infrastructure.**

10 Summary and Conclusions

10.1 Initial observations

- 10.1.1 The Area Type Settings and designation of **Shirley Local Centre Area** of **“Focussed Intensification”** has been removed from the emerging **Revised Local Plan**¹⁴ (Para 48) which carries more weight the nearer to its adoption.

10.2 Building Line Set-Back

- 10.2.1 The building line is created by the primary front face of buildings along a street and is a key element of **Design Code** of the locality. The **National Model Design Code & Guidance** requires **all new development** should follow the **established building line** where it exists.
- 10.2.2 Therefore the **Building Line Set-Back** for this proposed development should follow the **existing Building Line Set-back** of **≈7m** as it follows the curve of **Ridgemount Avenue**. Failure to meet this Policy is grounds for a **refusal**.

¹² <https://www.legislation.gov.uk/ukpga/2004/5/section/39>

¹³

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

¹⁴

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

10.3 Shirley Local Centre Assessment

10.3.1 Although the development Site is located within an area designated appropriate for **“Focussed Intensification”** the emerging **Revised Local Plan** has omitted this **“Focussed Intensification”** Designation from this locality due to insufficient and inadequate **supporting infrastructure** currently and in the foreseeable future. The location is therefore only appropriate for **“Gentle”** densification as defined in the emerging **Revised Local Plan Policy SP1.0C c)**.

10.3.2 Local Planning Authority Service Transformation 22/02/2023 Item 2:

2. Local Development Framework (LDF) Programme (Local Development Scheme).

*“... The key component of the LDF programme is the review of the local plan workstream and will be overseen by the LDF Board, which will report into the Planning Transformation Board. The review of the local plan will seek to **remove intensification zones, support sustainable development, and emphasise design and character over density.** ...”*

10.3.3 The TfL **Public Transport Accessibility Level (PTAL)** is level **2** and remaining at **PTAL 2** until at least 2031 (Forecast). There is no probability of improved infrastructure over the life of the Plan.

10.4 Design Codes & Guidance

10.4.1 There is no guidance to assess local **Design Codes** in either the adopted or revised **Croydon Local Plan** or in the **London Plan**.

10.4.2 The only Design Code assessment and Guidance is contained in the **National Model Design Code & Guidance** published by the DLUHC and referenced from the NPPF at paras 128 & 129.

10.5 Area Type Design Code Assessment

10.5.1 The Local Design Code Area Type Setting evaluated over the **Post Code Area** of **CR0 8TG** with an **Area of 0.3187ha** at **8 Dwellings¹⁵** with an occupancy of **17 persons** results in a **Housing Density of 25.10Units/ha** and **Residential Density of 53.34 bs/ha**. This places the **Post Code Design Code Area Type** within a **“Outer Suburban”** Setting in the **Range 40 to 60 U/ha** as defined by the **National Model Design Code & Guidance**.

10.5.2 Assessment in accordance with the **National Model Design Code** clearly indicates that the **Housing Density** at **123.46U/ha** of the proposed development is more appropriate in a **“Central” Area Type Setting** than the actual **“Outer Suburban” Area Type Setting** of the **Shirley Local Centre**. This is conclusive evidence of **over development** for the **“Site Capacity”** of **≈0.0324ha** in an **Outer Suburban** Setting at **PTAL 2**.

10.6 Floor Area Ratio and Plot Footprint Ratio

10.6.1 The proposed development has a site area of **324m²** and the offered **Gross Internal Area** of **187.7m²** equates to a **Floor Area Ratio** of $187.7/324 = 0.579$. **exceeding 0.5**

¹⁵ <https://www.gov.uk/government/organisations/valuation-office-agency>

recommended in the **National Model Design Code Guidance** by **15.8%**.

10.7 Residential Density and Public Transport Accessibility

10.7.1 The **Area Type Setting** at **211 Wickham Road** is **“Outer Suburban”** for a TfL assessment of connectivity but the **Application Density** in terms of **bedspaces per hectare** at **216.05bs/ha** is within the mid-range of an **“Urban” Area Type Setting**.

10.7.2 The offered **Residential Density** in terms of **persons (bedspaces) per hectare (bs/ha)** would require a **PTAL** of **4.29** when the available **PTAL** is only available at **PTAL 2**.

10.8 Densification

10.8.1 The level of densification appropriate at **211 Wickham Road** at the junction of **Ridgemount Avenue** is given at **Revised Croydon Plan Policy SP1.0C c). i.e., Evolution and gentle densification**.

10.8.2 The proposed development at **211 Wickham Road**, with a **Site Capacity** limitation of **0.0324ha** and an increased **“Gentle” Densification** in a **“Outer Suburban”** Setting should **NOT** exceed a **Housing Density** ≈ 46.67 (i.e., $(40 + (60 - 40) / 3) = 46.67$, to ensure sustainable supporting infrastructure, but it actually reaches **123.46U/ha** which would be appropriate for a **“Central” Area Type Setting**.

10.8.3 **211 Wickham Road** is also greater than **800m** from the **Shirley Neighbourhood Centre**. However, the requirement is to be **“greater than 800m from a District Centre”** and **Shirley** is a **Local Centre**, **NOT** a **District Centre**. Therefore, the location of **211 Wickham Road** is inappropriate for **“Incremental Intensification”** as defined by the **London Plan Para 4.2.4**.

10.9 Sustainability and Housing Need

10.9.1 We have shown that the recent developments in the **Shirley North Ward** have significantly exceeded the **London Plan Targets** over the 2019-2039 period at the current build and approval rates which proves that housing **“need”** in the **Shirley North Ward** has already been met.

10.9.2 It is therefore plainly obvious that the **inability to contain or mitigate** the **excessive outturn** above the stated **Targets** is a significant failure to meet the objectives of **Sustainability**¹⁶ as defined in the **NPPF Chapter - 2 Achieving Sustainable Development**¹⁷ as **Shirley** has no prospect of **infrastructure improvement** over the life of the Plan and the **Sustainability of Developments** is a **legal** requirement of **development approvals** and thus could be legally challenged.

11 The Planning Process

11.1 The forgoing submission is compiled on the grounds of **National and Local Planning Policies** and based upon **rational observations and evaluation**. There have been no **vague or subjective assessments** and therefore we respectfully request that all our foregoing analysis and evidence is a sound and

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

¹⁷

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

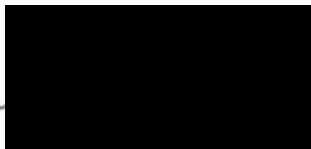


valid assessment and therefore extremely relevant to the final determination.

- 11.2 Local Residents have **“lost confidence in the Planning Process”** resultant on recent local **over-developments** and lack of additional supporting infrastructure, aggravated by fact that the collected CIL and 106 agreements on local developments were not spent in the locality of the developments.
- 11.3 In the majority of cases, Approved Developments disregarded National and Local vague ill-defined Planning Policies. Once that confidence is **lost**, it is extremely difficult to regain it. Confidence and support of local residents is necessary to ensure the general requirement of housing **need** is supported and satisfied with the provision of appropriate sustainable developments. This can only be achieved by ensuring developments comply with the agreed **National and Local Planning Policies and Guidance**.
- 11.4 We urge the **LPA to refuse this application** and request the applicant to submit a revised proposal meeting all Planning Policies. *If permission is Granted for this proposal, it would be absurd to believe that any of the quoted Planning Policies have any meaningful weight and local residents would be quite correct in their current complete loss of confidence in the Planning Process.*

Kind Regards

Derek



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Cc:

Sarah Jones MP
Cllr. Sue Bennett
Cllr. Richard Chatterjee
Cllr. Mark Johnson

Bcc:

MORA Executive Committee, Local Affected Residents', Interested Parties

Croydon Central
Shirley North Ward
Shirley North Ward
Shirley North Ward