

To: Jessica Lumber- Case Officer
The Planning Inspectorate, Room 3/10
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Bristol
BS1 6PN.

**Monks Orchard Residents' Association
Planning**

13th June 2023

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Appeal Reference:	APP/L5240/W/23/3317040
LPA Reference:	21/03518/FUL
Appeal Validated	19 th May 2023
Comments due	23 Jun 2023
Address:	13 Gladeside Croydon CR0 7RL
Proposal:	Demolition of existing dwelling and erection of a two-storey detached building with accommodation in roof space comprising 6 flats and provision of associated landscaping, car parking, refuse and cycle storage.

Dear Jessica Lumber

Please accept the following written representation from the Monks Orchard Residents' Association requesting Dismissal of this Appeal against the LPA refusal of Planning Application Ref: 21/03518/FUL on 23 August 2022. We were of the view that the delay to appeal had exceeded the 6-month limit. However, it is understood the appeal was submitted to the Planning Inspectorate on 20/02/2023 and the submission date was within 6 months from when the decision was issued. The Planning Inspectorate has confirmed that the appeal is valid. The Council only received a copy of the Appellant's 'Grounds of Appeal' statement of case on 22nd May 2023.

1 The Proposal:



2 Site Layout



Proposed Site Layout

3 LPA Reasons For Refusal

- 3.1 The proposed development would be detrimental to the street scene and character of the area by reason of the size, massing, footprint, form, and design and would thereby conflict with policies DM10 and SP4.1 of the Croydon Local Plan (2018) and D3 and D4 of the London Plan (2021).
- 3.2 The proposed development would provide a poor quality of residential accommodation by virtue of its inadequate communal amenity space, contrary to policies D3 of the London Plan (2021) and policies SP2.8 and DM10 of the Croydon Local Plan (2018).
- 3.3 The proposed development would result in a detrimental impact on highways and pedestrian safety as a result of inadequate visibility splays, unsafe manoeuvring, inadequate parking provision and the absence of contributions to sustainable travel in the area, contrary to policies DM29 and DM30 of the Croydon Local Plan (2018) and T4, T6 and T6.1 of the London Plan (2021).

4 Proposal's Parameters:

13 Gladeside			App Ref: 21/03518/FUL								
Site Area	625.05	sq.m.	Densities						Floor Area Ratio		0.65
App Form	0.062505	ha	Bedrooms Density		207.98	b/ha	Plot Area Ratio (Note 1)		0.19		
Post Code	CR0 7RL		Residential Density		319.97	bs/ha	Post Code		17.09	U/ha	
Area	1.4047	ha	Residential Density		303.98	hr/ha	Units		6		
Persons	60	(p)	Housing Density		95.99	U/ha	PTAL		2011	1a=0.66	
Dwellings	24	(Units)	Occupancy		3.33	hr/Unit	PTAL		2031	1a=0.66	
Unit	Type	Building Reg.	Floor	Bedrooms (b)	Bed Spaces (bs)	Habitable Rooms (hr)	GIA (Offered)	GIA (Required)	In-Built Storage (Offered)	In-Built Storage (Required)	Parking (Offered)
Unit 1	Flat 1	M4(2)	Ground	3	4	4	74.3	74	2.5	2.5	1
Unit 2	Flat 2	M4(3)	Ground	2	4	3	78.7	70	1.6	2	1
Unit 3	Flat 3	M4(2)	First	2	3	3	62.4	61	1.1	2	1
Unit 4	Flat 4	M4(2)	First	3	4	4	77.8	74	1.7	2	1
Unit 5	Flat 5	M4(1)	Second	1	2	2	51	50	0.6	1.5	0
Unit 6	Flat 6	M4(1)	Second	2	3	3	64	61	2.1	2	0
Grand Total				13	20	19	408.2	390	9.6	12	4

Note 1 Footprint dimensions NOT provided

5 Initial Observations:

- 5.1 The **Application Form** indicates the Site Area is **625.05sq.m**.
- 5.1.1 Page 3 of the **Design & Access Statement** indicates the (existing) *“The single dwelling is a two-storey detached house with a garage to the side and conservatory to the rear, the overall footprint of the property is 117sqm on a **615sqm plot**.”* In reference to the existing dwelling.
- 5.1.2 Thus, the Applicant/Appellant is somewhat confused as to the actual **Site Area Dimensions**.
- 5.1.3 We have used the **Application Form** larger figure of **625.05sq.m** \equiv **≈ 0.062505 ha** in all calculations for the benefit of the appellant.
- 5.2 The Appellant has questioned the Policies current at the time the proposal was submitted. The Application was received by the **LPA** and validated on **1 July 2021**. The current adopted Policies at that time from **National** down to **Local** were:
- 5.3 NPPF Published March 2021
- National Model Design Code & Guidance Published January 2021
 - London Plan Published March 2021
 - Croydon Local Plan Published 2018
 - SPD2 Published 2019 (Revoked 2022)
- 5.4 This application was validated Thu 01 Jul 2021 at a time when Supplementary Planning Document SPD2 was published as guidance. Although SPD2 was revoked in June 2022, it was current at the time of presentation and therefore although determine subsequent to SPD2 Revocation, was valid at the time of submission.
- 5.5 **Appellant’s Comments:**
- The Summary (3rd paragraph of the Appeal Statement For REFUSAL OF PLANNING PERMISSION 21/03518/FUL DATED 23 August 2022) states:
 - *“The application sought to re-develop an existing 4 bed detached dwelling on a **site of 615sqm**, into **6 flatted dwellings** comprised of 2 3B4p family sized units, 1x2b4 unit, 2x2b3p units and 1x1b2p unit with associated on-site parking for 4 vehicles.”*
 - **Relevant Policy SPD2.**
 - **Para 2.3.5** *Development proposals should be designed to Ensure they make the best use of the site. This may include the provision of higher density housing such as terraced houses and flats, rather than detached houses;*
 - **Figure 2.10e:** *Where surrounding buildings are semi-detached homes in a planned estate, new developments should seek to accommodate a full third storey partially contained within the roof space to ensure the characteristic scale of the buildings along the street is maintained.*
- 5.6 **MORA Comment**
- 5.6.1 There is some confusion by ‘**Aspect Living Appeal Statement**’ as the **Site Area** is Quoted as **615 sqm.**, which is again different from that of the **Application Form** and the **Design & Access Statement**.

6 **LPA Refusal Reason 1: Size, Massing, Footprint, & Form**

6.1 The proposed development would be detrimental to the street scene and character of the area by reason of the size, massing, footprint, form, and design and would thereby conflict with policies DM10 and SP4.1 of the Croydon Local Plan (2018) and D3 and D4 of the London Plan (2021).

6.2 Case Officer's Report

6.2.1 **Para 5.8** *“The surrounding townscape is characterised by suburban residential development. The existing contextual development patterns are fairly uniform. The immediate locality consists of two-storey semi-detached dwellings, with bay windows, arched window heads, quoins and contextual materials include render, brickwork, pebbledash and hung tile.”*

6.2.2 **Para 5.9** *“The footprint, **massing**, and form does not respond to the existing pattern of development, which is fairly uniform. Furthermore, the footprint is sited too far back within the plot, which results in uncomfortable adjacencies with adjoining neighbours and the front building line would disrupt the rhythm and character of the street scene.”*

6.3 Appellant's Response

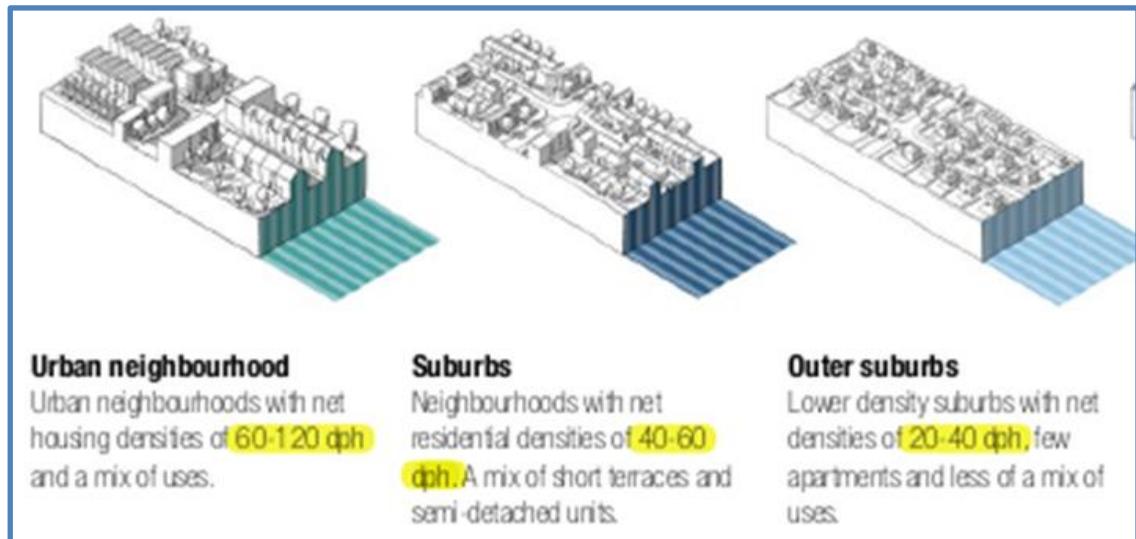
- *It should be considered that design is subjective; and it is felt that the immediate vicinity does not have a particularly uniform sense of development pattern or characteristic. Evidenced by differing build styles ranging from 1930's Berg housing with hipped gables, (some with side dormer projections), to 1960's housing with full gable ends to new builds with clipped gables. The staggered build lines are irregular with distances between neighbouring dwellings ranging from 1.9m to 10.5m from each established build line of each housing block, whilst the distance between neighbouring side elevations of neighbours dwellings range from 1.8m to 6.5m. Garages which are all visible from street scene are internal, attached to the side and detached rear garages.*
- *A range of build materials exist in brick with a variety of hues, render and pebbledash. Frontage of dwellings in the immediate vicinity vary greatly in size with the majority of driveways being fully hard-surfaced ranging from 4.9m to 19.5m in depth from the pavement whilst housing styles differ ranging from detached and semi-detached bungalows, detached 2 story dwellings, semi-detached dwellings and new builds forming backland developments.*
- *Garden depths and sizes differ with dwellings in the immediate vicinity and are built to a tapering boundary of Ashburton playing fields. Average garden size is increasingly being reduced in size as more development occurs in the rear gardens of existing dwellings. Several bungalows have been approved along with backland developments, most recently, that of no.26 Gladeside being approved. Permitted development has also allowed owners to extend homes, with the ground floor footprint of houses ranging from 46sqm for original dwellings, to 142sqm for homes which feature both side and rear extensions; which are in abundance within the immediate area.*
- *Whilst in the wider vicinity, there are ever increasing styles of houses and flats, to suggest that a particular design of submission would be detrimental to the character of the area would seem an unfair suggestion given the eclectic mix of housing types in the immediate context and wider context of Monks Orchard as a whole.*

6.4 MORA Response

- 6.4.1 The general context of the Appellant's case is based on the assessment of the proposal with the surrounding local character. Our analysis and response is based on such an assessment.
- 6.4.2 In order to assess the acceptability or otherwise against the **Size, Massing or Footprint** (i.e., Site Capacity) the application requires assessment with the local character and supporting infrastructure as required of the locality into which the proposal is to be built. This requires assessment against the **Local Design Code**.
- 6.4.3 The Policies for such assessment are the **National Planning Policy Framework (NPPF)** (2021) and at para 129 references out to the **National Model Design Code & Guidance** published January 2021, the **London Plan** and the **Croydon Local Plan**.
- 6.4.4 **National Planning Policy Framework (NPPF)**
- 6.4.4.1 **NPPF Para 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.**
- 6.4.5 **London Plan**
- 6.4.5.1 **London Plan Policy D1 - London's form, character, and capacity for growth.** Should undertake area assessments to define the characteristics, qualities and value of different places to assess the capacity of existing and planned physical, environmental and social infrastructure to support the required level of growth.
- 6.4.5.2 **London Plan Policy D2 - Infrastructure requirements for sustainable densities.** Should ensure that Infrastructure requirements for sustainable densities be proportionate to the site's connectivity and accessibility.
- 6.4.5.3 **London Plan Policy D3 – Optimising Site Capacity through the Design Led Approach** recognises the need for **Optimising Site Capacity** by use of '**Design Codes**' but does NOT give any guidance or methodology how that should be achieved.
- 6.4.6 **Croydon Local Plan (2018)**
- 6.4.6.1 **Croydon Local Plan (2018)** does NOT provide any guidance on the assessment of local **Design Code**. The **Revised (Draft) emerging Croydon Local Plan (2021)** also does NOT provide any guidance on the assessment of **local Design Code Assessment**.
- 6.5 **Design Code and Area Type Assessment**
- 6.5.1 As there is no guidance on the assessment of "**Design Codes**" provided in either the adopted **Croydon Local Plan** or the **Revised Croydon Local Plan**, or the **London Plan (2021)** therefore in the absence of any Local Guidance, and as the **National Model Design Code & Guidance** documents were published in **January 2021** and updated in **June 2021**, it is therefore appropriate to use this **guidance** for local planning proposals

against the assessment defined in the **National Model Design Code & Guidance**. This guidance was published prior to the proposal being submitted.

6.5.2 National Model Design Code & Guidance (extract)



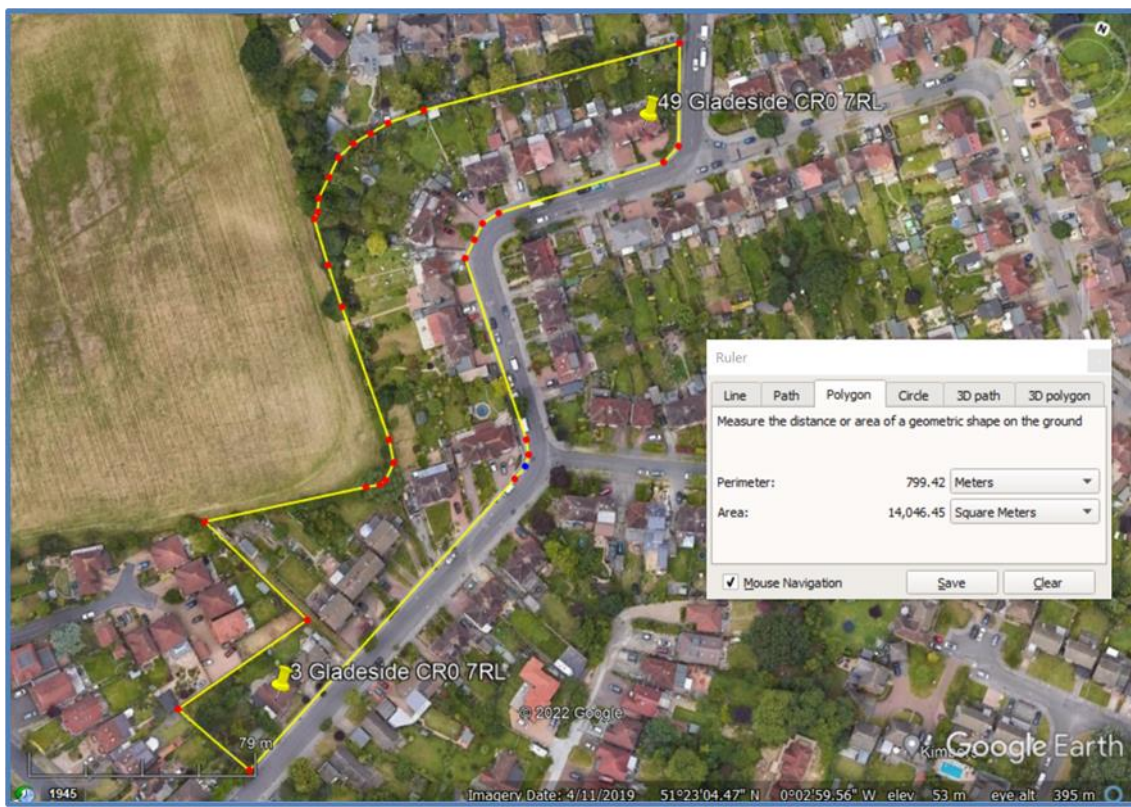
Extract from the National Model Design Code & Guidance “Built Form” for Area “Outer-Suburban,” “Suburban” & “Urban” Neighbourhoods.

6.5.3 Area Type Design Code Assessment – Post Code & Application

- 6.5.3.1 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 local **Post Code Area CR0 7RL** for such an area assessment.
- 6.5.3.2 The following **Google Earth** image (below) shows the **Post Code Area** to be **≈14046.45 sq.m** which equates to **≈1.4046 ha**.
- 6.5.3.3 The local **Post Code CR0 7RL** has a population of **60¹** in an Area of **1.4046ha** and has **24 dwellings** from **3 Gladeside to 49 Gladeside²** This results in a **Housing Density** of **17.09U/ha** and a **Residential Density** of **42.72Persons/ha**.
- 6.5.3.4 These assessments place the **Design Code Housing Density** for the locality of the proposed development at **17.09 Units per hectare** which is **below** the density range for **“Outer Suburban”** as defined by the **National Model Design Code & Guidance**.
- 6.5.3.5 The Post Code Area assessed roughly from Google Earth at **1.4046.6sq.m. ≈1.4046ha**.
- 6.5.3.6 The following **Google Earth Image** and **Table** of the wider **Shirley Area**, including **Shirley North** and **Shirley South Wards**, analysis provides **conclusive evidence** that **Shirley** is definitely an **“≤Outer-Suburban” Area Type Setting** as Defined in the **National Model Design Code and Guidance** as **all** assessments show equal to or less than the **Housing Density** appropriate to an **“Outer-Suburban” Area Type Setting**.

¹ <https://www.postcodearea.co.uk/>

² <https://www.gov.uk/council-tax-bands>



Google Earth measurement of Post Code CR0 7RL Area

Location	Area (ha)	Population (Nat Ave)	Dwellings (Units) (Nat Ave)	Residential Density (bs/ha)	Housing Density (Units/ha)	"Setting" for Design Code Residential Density (bs/ha)	"Setting" for Design Code Housing Density (U/ha)	Occupancy Ratio (Nat Ave 2.36)
Croydon	8,652.00	390,719	165,559	45.16	19.14	<Outer Suburban	<Outer Suburban	2.36
Shirley North Ward	328.00	15,406	6,528	46.97	19.90	<Outer Suburban	<Outer Suburban	2.36
Shirley South Ward	384.40	10,619	4,500	27.62	11.71	<Outer Suburban	<Outer Suburban	2.36
All Shirley	712.40	26,025	11,028	36.53	15.48	<Outer Suburban	<Outer Suburban	2.36
MORA Area	178.26	9,166	3,884	51.42	21.79	Outer Suburban	Outer Suburban	2.36
Post Code CR0 8S(*)	16.95	627	237	36.99	13.98	<Outer Suburban	<Outer Suburban	2.65
Post Code CR0 8T(*)	11.82	644	246	54.48	20.81	Outer Suburban	Outer Suburban	2.62
Post Code CR0 7PL	1.73	47	19	27.17	10.98	<Outer Suburban	<Outer Suburban	2.47
Post Code CR0 7QD	1.51	68	28	45.03	18.54	<Outer Suburban	<Outer Suburban	2.43
Post Code CR0 7PB	1.24	40	25	32.26	20.16	<Outer Suburban	Outer Suburban	1.60
Post Code CR0 8UB	1.70	71	30	41.89	17.70	<Outer Suburban	<Outer Suburban	2.37
Post Code CR0 7NA	1.97	36	18	18.27	9.14	<Outer Suburban	<Outer Suburban	2.00
Post Code CR0 7NE	0.83	26	11	31.33	13.25	<Outer Suburban	<Outer Suburban	2.36
Post Code CR0 7NN	0.75	54	28	71.94	37.30	Outer Suburban	Outer Suburban	1.93
Post Code CR0 7RL	1.40	60	24	42.72	17.09	<Outer Suburban	<Outer Suburban	2.50
Post Code CR0 7PX	0.96	21	11	21.81	11.43	<Outer Suburban	<Outer Suburban	1.91
Shirley Oaks Village ^{Note 2}	19.12	1,286	545	67.26	28.50	Outer Suburban	Outer Suburban	2.36
Shirley "Place" ^{Note 1} (Estimate)	770.00	32,995	13,981	42.85	18.16	<Outer Suburban	<Outer Suburban	2.36
Average (Not including Croydon)	143.12	5,717	2,420	40.97	18.00	<Outer Suburban	<Outer Suburban	2.29

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

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

Design Code Assessment of Various Post Codes in Shirley

6.5.4 Comparison between Post Code and Application

Parameters of Post Code Design Code				
Area Design Code Parameter (These parameters auto calc Design Code)	Input Parameters		Constrains	
Post Code	CR0 7RL		Ward	Shirley North
Area of Post Code (ha)	1.40465	hectares	Flood Risks	100yr Surface Water
Area of Post Code (Sq.m)	14046.5	sq.m.	Gas Pressure	Low Pressure
Number of Dwellings (Units) (*)	24	Units	Water Pressure	N/A
Number of Occupants (Persons) 4th April 23 (**)	60	Persons	HASL (m)	52m
Post Code Housing Density	17.09	Units/ha	Building Line Set-Back	10m to 14m
Post Code Residential Density	42.72	Bedspaces/ha	Adjacent to Metropolitan Open Land (MOL)	
Occupancy	2.50	Persons/Unit		
Area Type (National Model Design Code)	<Outer Suburban	Area Type Setting		
(*) Last updated on 17 May 2023				
(**) https://www.postcodearea.co.uk/				
Design Code Parameters		Min	Max	Measure
NMDC&G Area Type Setting	<Outer Suburban	0.00	20.00	Units/ha Range
Equivalent Residential Density (Persons/ha) ¹	<Outer Suburban	0.00	47.20	Persons/ha Range
¹ Based upon National Occupancy of 2.36 persons/dwelling ²				
² https://www.statista.com/statistics/295551/average-household-size-in-the-uk/				
		U/ha	bs/ha	
PTAL to Support Post Code Residential Density	-0.114		42.72	
PTAL (now) 1a numerically \equiv 0.66	0.66	2.20	5.19	Limits for PTAL
PTAL (forecast 2031) 1a numerically \equiv 0.66	0.66	2.20	5.19	Limits for PTAL
Gentle Intensification (Limits in U/ha & bedspaces/ha ¹)		6.67	15.74	Limits for "Gentle" Intensification
Moderate Intensification (Limits in U/ha & bedspaces/ha ¹)		13.33	31.46	Limits for "Moderate" Intensification
Focussed Intensification (Limits in U/ha & bedspaces/ha ¹)		20.00	47.20	Limits for "Focussed" Intensification

Assessment of Post Code Design Code parameters

6.5.4.1 In order to assess the acceptability of the proposal within the constraints of the localities **Design Code Area Type Setting**, it is appropriate to compare the **Application** parameters with those appropriate for the locality as defined by the **Post Code Design Codes** and the guidance provided in the **National Model Design Code** referenced from the **NPPF para 129**.

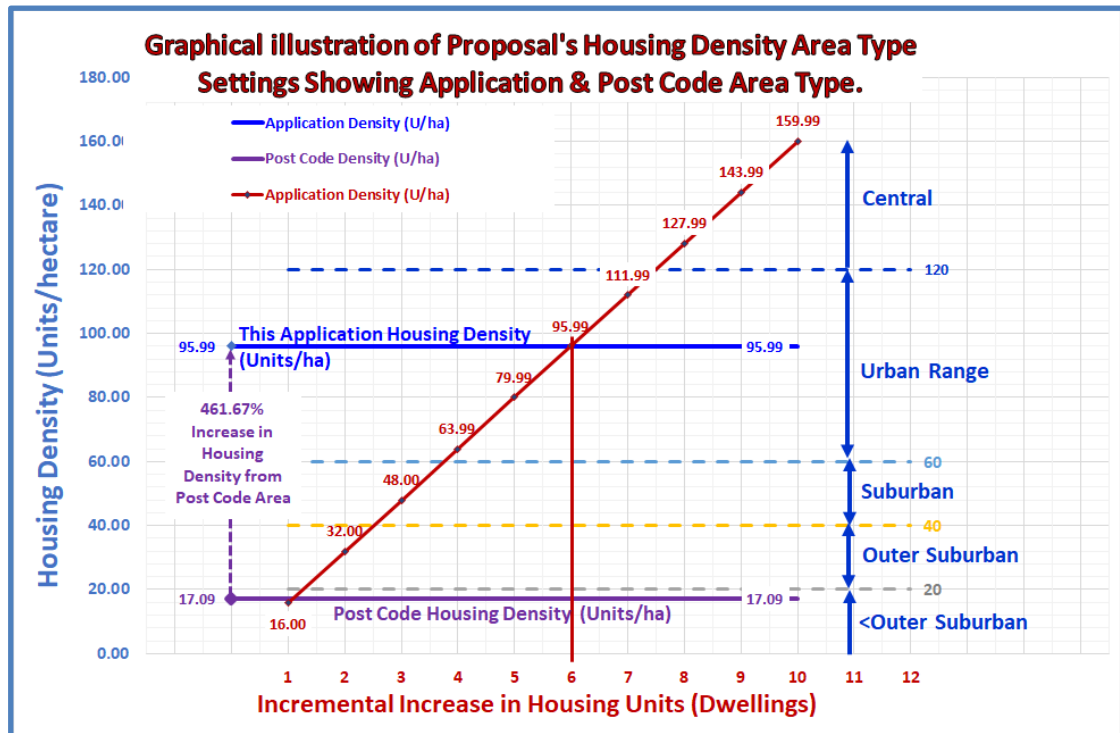
Application Details		
Application Ref:	21/03518/FUL	
Address	13 Gladeside	
PostCode	CR0 7RL	
Appeal Ref:	APP/L5240/W/23/3317040	
Parameters		
Site Area (ha)	0.062505	ha
Site Area (sq.m.)	625.05	sq.m.
Units (Dwellings)	6	Units
Bedrooms	13	Bedrooms
Bedspaces	20	Persons
Housing Density	95.99	Units/ha
Residential Density	319.97	bs/ha
Occupancy	3.33	Persons/Unit
National Average Occupancy	2.36	Persons/Unit
Floor Area Ratio (FAR)	0.65	
Plot Area Ratio (PAR)	0.19	
NMDC&G Area Type Setting (Units/ha)	Urban	
Area Type Setting (Bedspaces/ha) ²	Central	
² Based upon National Average Occupants/Dwelling		
² https://www.statista.com/statistics/295551/average-household-size-in-the-uk/		
PTAL (Current)	0.66	1a
PTAL (Forecast)	0.66	1a
PTAL to Support proposal	6.93	950.00%

Application Design Code Parameters

Comparison - Post Code (CR0 7RL) Design Code & Application Proposal		
	Value	Area Type Setting
Post Code Housing Density (Units/ha)	17.09	<Outer Suburban
Application Housing Density (Units/ha)	95.99	Urban
Percentage Difference (%)	139.55	%
Percentage Increase (%)	461.67	%
Post Code Residential Density (bs/ha)	42.72	<Outer Suburban
Application Residential Density (bs/ha)	319.97	Central
Percentage Difference (%)	152.89	%
Percentage Increase (%)	648.99	%
PTAL Available (1a)	0.66	
PTAL Required	6.93	
Percentage Increase	950.00	%
National Average Occupancy	2.36	
Post Code Occupancy	2.50	
Application Occupancy	6.00	
Percentage Increase	140.00	%

Comparison of Post Code Post and Application Design Code.

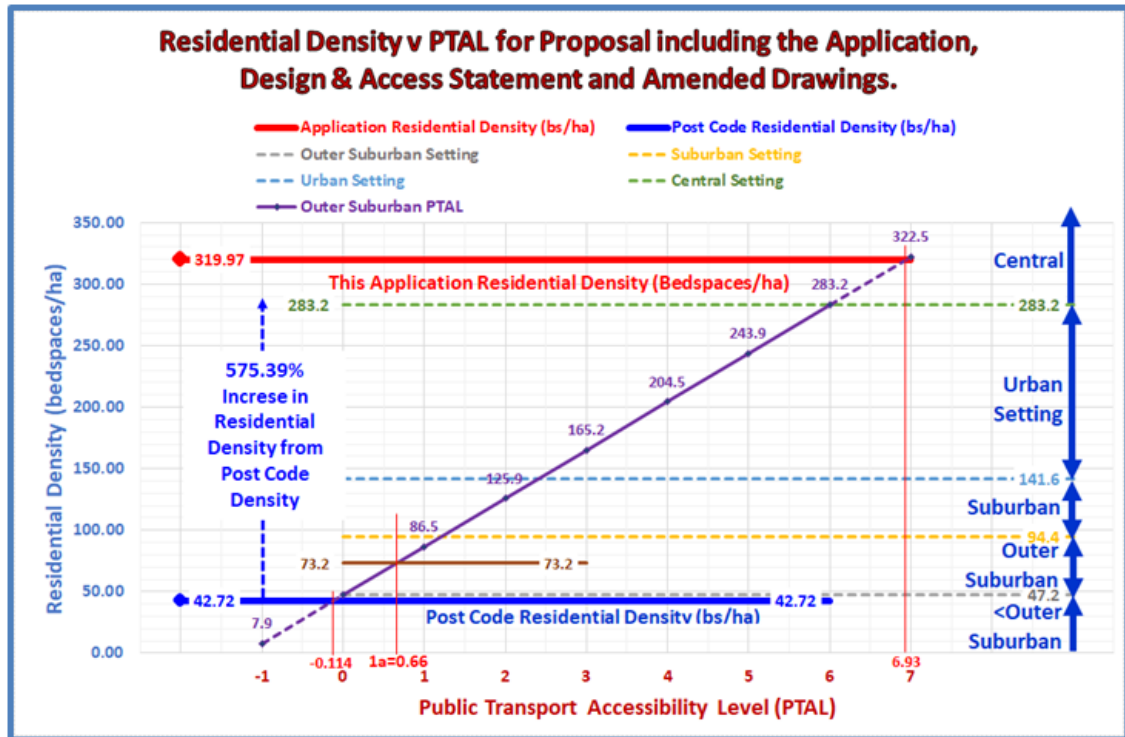
6.5.4.2 Comparison of Post Code Design Code & Application Design Code.



Assessment of Post Code parameters to determine the Area Design Code.

6.5.4.3 The Post Code Housing Density Area Type is **17.09 Units/ha** whereas the proposal would have a Housing Density of **95.99 Units/ha** which is a **461.67%** increase and would mean a change in Area Type from an **<Outer Suburban Area Type** to an **Urban Area Type Setting**.

6.5.4.4 This change of **Area Type** is from **<Outer Suburban**, through the **Outer Suburban** and **Suburban Area Types** before stabilising at an **Urban Area Type Setting** Application Parameters.



Assessment of Area Type Design Code for Shirley Local Areas by analysis.

6.5.4.5 Similarly, The **Post Code Residential Density** is **47.42bs/ha** (bs=Bedspaces) whereas the proposal would have a **Residential Density** of **319.97 bs/ha** which is a **648.99%** Increase and would be equivalent to an increase from **<Outer Suburban** through **Outer Suburban, Suburban & Urban** to a **Central Area Type** Setting (Based upon a *National average conversion factor*³ of **2.36 Persons/Unit**).

6.5.4.6 The Revised **London Plan** (2021) omitted the **Density Matrix** with the result that there is now no guidance relationship between **Residential Density** and **Area Type** or **PTAL**. As an alternative analysis it is assumed that any increase in **Residential Density** would result in an increase in local population which would require a commensurate increase in **Public Transport Accessibility Level** (PTAL).

6.5.4.7 Without any TfL assessment it is assumed that the relationship between **Residential Density** and **PTAL** would be an incrementally linear increase over the **Area Type** ranges of **Outer Suburban** (PTAL Zero) to the Max of **Urban** (min of **Central**) (PTAL 6) **Area Type** ranges (**Central** would be 6, 6a & 6b). The TfL parameter of **Residential Density** in the **Density Matrix** was habitable rooms/hectare (hr/ha) which is illogical as habitable rooms do not require **Public Transport** or any type of social supporting infrastructure. The most appropriate parameter for **Residential Density** is **People/ha** or when applying the development proposals, bedspaces per hectare.

³ <https://www.statista.com/statistics/295551/average-household-size-in-the-uk/>

6.5.4.8 Thus, the linear incremental increase in **PTAL** would follow the simple function:

$$y = mx + c$$

Where $y = \text{Residential Density}$; $m = \frac{\delta y}{\delta x}$; $x = \text{PTAL}$ & $c = y \text{ when } x = 0$

Therefore, The **Post Code Residential Density** of Application proposal of **42.72bs/ha** would require a **PTAL** of:

$$y = 42.72 = \left(\frac{120 * 2.36 - 20 * 2.36}{6} \right) x + 20 * 2.36 \therefore x = \text{PTAL} = \frac{42.72 - 47.2}{39.33} = -0.114$$

(Where the conversion factor of 2.36, i.e., the National Average Unit Occupancy⁴)

The available **PTAL** of **1a** \equiv **0.66**. would support a **Residential Density** of:

$$y = \left(\frac{120 * 2.36 - 20 * 2.36}{6} \right) * 0.66 + 20 * 2.36 = 39.33 * 0.66 + 47.2 = 73.315 \text{bs/ha}$$

6.5.5 Croydon Local Plan Growth Policies

6.5.5.1 The Croydon Local Plan was adopted 5 years ago and is now exceeding the recommended period for revision of 5 Years. The Policies are now out-of-date and being overtaken by the Policies defined in the **London Plan** and **National Planning Policies**. It is understood the **Revised Croydon Local Plan** will NOT be adopted until late 2025 which means the current adopted version is becoming irrelevant as the National & London Plan Policies negate those defined in the current adopted **Croydon Local Plan**.

6.5.5.2 The Current **Croydon Plan** Policy for “Growth” is set out at Table 6.4 and para 6.58.

6.58 There are existing residential areas which have the capacity to accommodate growth without significant impact on their character. In these locations new residential units can be created through the following interventions.

- a) Conversion – The conversion or subdivision of large buildings into multiple dwellings without major alterations to the size of the building.
- b) Addition – This can include one or more extensions to the side, rear, front or on the roof, and is often combined with conversion of the existing building into flats.
- c) In-fill including plot subdivision – Filling in gaps and left over spaces between existing properties. It can also include subdivision of large plots of land into smaller parcels of land with a layout that complements the existing urban pattern.
- d) Rear garden development – The construction of new buildings in rear gardens of the existing properties. Houses must be subservient in scale to the main house.
- e) Regeneration – The replacement of the existing buildings (including the replacement of detached or semi-detached houses with flats) with a development that increases the density and massing, within the broad parameters of the existing local character reflected in the form of buildings and street scene in particular.

6.5.5.3 Thus, for **Redevelopment or Regeneration** the proposal should be a development that increases the density and massing, within the broad parameters of the existing local character reflected in the form of buildings and street scene in particular. However, such

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

an increase in density should NOT bridge an Area Type Setting as the existing infrastructure could NOT support the increase unless a planned increase in supporting infrastructure is planned within the life of the Plan. (London Plan Policy D2 Infrastructure requirements for sustainable densities).

- 6.5.5.4 These designations have descriptive characteristics which are undefined and subjective objectives and as such are fundamentally meaningless as there is no definition which separates the designations and therefore none are enforceable. None of the designations include any consideration of a requirement to meet supporting infrastructure or Public Transport Accessibility for any increase in **Housing** or **Residential Density** resultant on the designated intensification or sustainability. Thus, the designations as Policy requirements are totally flawed.
- 6.5.5.5 The **London Plan** (2021) omits the **Density Matrix** of previous iterations and has now no methodology relating Density to **Area Types** or **PTAL**. The Revised **London Plan** 2021 (adopted) **Chapter 3 – Design**, along with **Policy D2 Infrastructure requirements for sustainable densities** and **Policy D3 Optimising site capacity through the design-led approach** gives some guidance; but the Policies require further clarification before substantive quantifiable decisions can be assessed, analysed and recommended, as the Policies are currently too subjective and vague. **Supplementary Planning Guidance** is in Draft form and has yet to be published (promised in 2022 but recently published, June 2023).



Google Earth Image showing 13 Gladeside is > 800m from any Train or Tram Station or District Centre

- 6.5.5.6 The **London Plan** para 4.2.4 provides guidance for **“Incremental intensification”** of existing residential areas within **PTALs 3-6** or within **800m** distance of a station or town centre boundary and is expected to play an important role in contributing towards

the housing targets for **Small Sites**.

6.5.5.7 It is therefore concluded that Areas below (<) **PTAL 3** and greater than (>) **800m** from a Tram/Train Station or District Centre would be *'inappropriate'* for *"Incremental Intensification"*. However, there is no definition of what *"Incremental Intensification"* actually means in terms of a percentage or numerical incremental increase in **Density**.

6.5.5.8 **The Post Code of this proposal CR0 7RL is defined by TfL at PTAL 1a** which is significantly less than (<) **PTAL 3** and is greater than (>) **800m** from any **Train** or **Tram station** or **District Centre** and is therefore inappropriate for *"Incremental Intensification"*.

6.5.6 Allowable Growth.

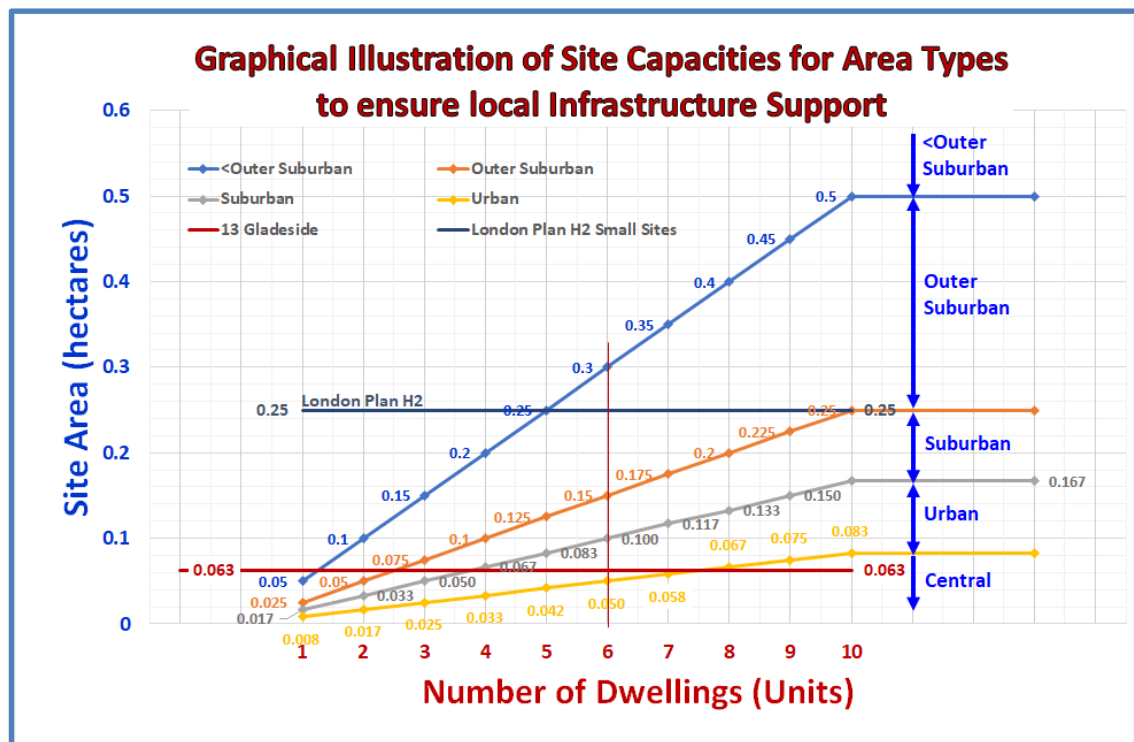
6.5.6.1 The only allowable Growth Policy is therefore The Croydon Plan Policy **SP1.0C**

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

6.5.6.2 However, there is no numerical definition of **"Gentle"** densification increase in Density in terms of % or numerical value. Thus, again the Policy definition is flawed.

6.5.7 Site Capacity

6.5.7.1 **London Plan Policy D3 Optimising site capacity through the design-led approach.**



Site Capacities for Area Types as defined by the National Model Design Code and Guidance.

6.5.7.2 Optimising **site capacity** means ensuring that development is of the most appropriate form and land use for the site.

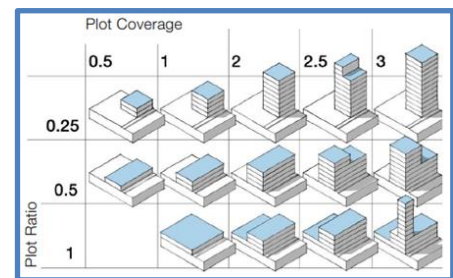
- Para 3.3.1 For London to accommodate the growth identified in this Plan in an inclusive and responsible way every new development needs to make the most efficient use of land by optimising **site capacity**. This means ensuring the development's form is the most appropriate for the site and land uses meet identified needs.
- Para 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.

The Graphical illustration above shows that for **6 Dwellings** in an **<Outer Suburban Area Type** a Site Area of at least **0.3ha** is required but the available Site is **0.062505ha** a deficiency of **0.2375ha**. or a **Site Area** deficiency of **79.165%**.

6.5.8 Floor Area Ratio and Plot Footprint Ratio

6.5.8.1 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**.



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

The **Nation 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**

6.5.8.3 The **National Model Design Code & Guidance** for ‘**Suburban**’ **Area Types** provides clear guidance on Densities, **Area Types** (see previous comments) and the **Floor Area Ratios**. The ‘**Suburban**’ **Floor Area Ratio (GIA/Site)** should be **<0.5** (less than) whereas the proposal has a **Floor Area Ratio** of $408.2 / 625.05 = 0.653$ i.e., **>0.5**, an **30.6% increase** on the maximum recommended. This requirement of **Floor Area Ratio** provides a measurable requirement to ensure spaciousness surrounding the building within the Site to reflect the openness for the **Area Type Setting**.

6.5.8.4 However, the proposal is in an area of **<Outer Suburban** which is two area types below **Suburban** i.e., **Suburban** & **Outer Suburban** and therefore **<0.5** is a high benchmark for **<Outer Suburban Area Type Floor Area Ratio (FAR)**.

6.5.8.5 It is suggested the **preferred FAR for ≤Outer Suburban Area Type should be ≈75% of the defined <0.5 Ratio for Suburban Area Type Settings** at **≈0.375** as a rough

guide for an appropriate spaciousness for the **Floor Area Ratio** for **Area Type <Outer Suburban>** locations due to the spacious Gardens in this Post Code Area to respect the local character. It is not feasible to provide the overall average GIA estimate for all the dwellings within the **Post Code Area CR0 7RL** but a **Ratio of 0.375** seems appropriate.

6.5.9 **Plot Coverage Ratio = Footprint/Site Area**

6.5.9.1 The **Design and Access Statement** at page 3 indicates the existing **Build Footprint** is **117 sq.m** and the Plot Area is **615sq.m**. which gives a **Plot Coverage Ratio** of **117/615 = 0.19** but the site area quoted on the **Application Form** indicates **625.05sq.m**. which gives a **Plot Coverage Ratio** of **117/625.05 = 0.187**. We are not confident of the reliability of these figures.

6.6 **Case Officer's Comments 5.10 to 5.15 (Summarized)**

6.6.1 These comments relate to Roof Form, architecture styles and landscaping with a final comment at **Para 5.15** on the footprint, form, massing, and design fails to respect street scene and the existing pattern of development, contrary to policies DM10 of the Croydon Local Plan and D3 and D4 of the London Plan.

6.6.2 **Appellant's abbreviated Comments**

- The Appellant has responded to all these comments.
- The scheme designed is a 3-story building with top floor accommodation located in the roof space as per policy at the time of submission.
- The Appellant has described the proposed building and position in the locality.
- The Appellant has described the half-hipped Foodscape and indicated examples of which can be found of along Gladeside and the wider area as detailed in our Design and Access statement and some examples of front dormers.
- Other schemes have also been recently approved such as that of the 8-unit flatted scheme at 37 Woodmere Ave, which incorporated similar dormers and roof forms as this scheme.
- The Appellant has As reference pre-app discussions, in which the development was reduced in footprint by 10% from pre-app.
- The Appellant has referred to 21 Gladeside indicating the proposed dwelling is not much larger than dwellings in the immediate vicinity with both single and double story extensions at 13.6m (eg: no.7 Gladeside, no. 25 Gladeside, no.6 Lorne Avenue).
- dwellings in the immediate vicinity have frontages which are predominantly hardstanding with examples.
- A landscape plan was submitted introducing high quality soft landscaping with low level trees and shrubs to both enhance the suburban character of the site, and shield hardstanding from the street scene in line with pre-app guidance, and as detailed in the D&A Statement.

6.7 **MORA comments**

6.7.1 We have responded to these issues in our earlier responses. We have no further constructive comments to add.

6.8 Summary Refusal Reason 1: size, massing, footprint, & form

6.8.1 The forgoing comprehensive evidence both literal written form and graphical illustrations provides clear undeniable and convincing proof that the **LPA's Reason 1 for refusal** has convincingly been proven to be **100% True** and therefore a substantial reason for refusal and also significant evidence for the **dismissal of this appeal**.

6.8.2 The proposal does **NOT** reflect the **character** of the locality in terms of Building **Mass**, **Area Type**, **Housing Density**, **Occupational Density**, **Residential Density** or the Accessibility requirement for **Public Transport**. The proposal is therefore **inappropriate** for the locality as defined by the **National Model Design Code & Guidance**.

7 LPA Refusal Reason 2: Residential Accommodation

7.1 Refusal Reason 2

7.1.1 The proposed development would provide a poor quality of residential accommodation by virtue of its inadequate communal amenity space, contrary to policies D3 of the London Plan (2021) and policies SP2.8 and DM10 of the Croydon Local Plan (2018).

7.2 Case Officer's Comments

7.2.1 **Para 5.24** *A total of 62.1sqm of communal play space is required in line with policy DM10.4d of the Local Plan. This would be achieved to the side/rear of the site. However, it has not been demonstrated that the communal amenity space would be of high-quality design. The space appears leftover within the site as there is no direct through route from the communal core to the communal garden, which will likely affect its usability. Policy DM10.5 of the Local Plan states that communal amenity spaces should be "flexible and multifunctional" and should provide a variety of different spatial experiences to cater for multiple users. The current site layout does not demonstrate that this could be achieved, particularly once the play area and cycle stores are considered.*

7.3 Appellant's Comments

- *Whilst the planners acknowledged that 'Balconies and private gardens would provide adequate amenity space for all units, in line with policy DM10 of the Local Plan', they contended that the communal amenity was of a high-quality design.*
- *It seems prudent to draw the planning inspectorates attention to nearby approved developments which were approved without any communal amenity space, or private amenity space, for which numerous examples in the borough exist.*
- *To quote 20-01968 FUL (174 The Glade) ' the proposed flat would be in relatively close walking distance to Long Lane wood with various recreation grounds and parks being slightly further away. Therefore, in this instance, the lack of (any) private amenity space is acceptable'.*
- *We would argue, by the councils own admission, that they have set a precedent for sites which are close to recreation facilities which do not require private, or communal amenity space, where units are slightly oversized; as ours are.*
- *It is noteworthy that 13 Gladeside has direct access to Ashburton playing fields, which is 49.5 acres. The existing secure gated access route provided through the communal*

garden and would be retained to continue providing access ordinarily taking 3 minutes to walk to when walking along Gladeside and Woodmere Ave.

- *In line with our landscape plan, we contest the communal amenity is of poor quality. With open seated areas, biodiversity/ wildflower zones, and play areas which are not overshadowed by trees or built structures and have a south westerly aspect; the communal garden would have access to sunlight throughout most of the day without overshadowing; whilst offering a safe and functional communal space at the rear of the site. Additional security exists in that it is partially overlooked by the ground floor flat and the balconies on the south westerly elevation.*
- *The communal amenity is likely limited in use reason of the large private gardens allocated to ground floor units at 51sqm and 24sqm respectively. First and second floor recessed balconies meet minimum space standards, but, offering increased privacy through their partial recessed design, and direct overlooking of Ashburton playing fields which sits south west of the site ensuring little overshadowing for the majority of the day.*
- *Our design by contrast has provided high quality private amenity and communal amenity space which far exceeds required minimum space standards, with direct access to Ashburton playing fields which near 50 acres in size, (which include further play areas, football fields, and various other recreational facilities), whilst the site within short walking distances to numerous other recreation grounds, woods and country parks.*
- *As such, we consider the refusal reason unfair and contradictory to practice and standards taken when determining other applications within the Monks Orchard vicinity.*

7.4 MORA Comments

- 7.4.1 The Appellant's bullet point 2 references precedents set by previous approvals without private, or communal amenity space. These approvals could have been at a time when policies did not include these requirements. Precedents are overtaken by the introduction of new policies. If the precedents are maintained there is NO sense in introducing NEW policies.
- 7.4.2 Local near available amenities or open space is not a reason for non-provision of a dwelling's lack of Private Open Space as defined in the London Plan.
- 7.4.3 The proposed development would provide a poor quality of residential accommodation by virtue of its inadequate communal amenity space, contrary to policies D3 of the London Plan (2021) and policies SP2.8 and DM10 of the Croydon Local Plan (2018).
- 7.4.4 We have not found any **London Plan Policy** quantifying **Communal Open Space** requirements for **Flats** or **HMOs**.
- 7.4.5 The **Croydon Local Plan** (2018) has no defined requirement for Communal Open Space.
- 7.4.5.1 **DM10.4** All proposals for new residential development will need to provide private amenity space that.
- a. Is of high-quality design, and enhances and respects the local character;
 - b. Provides functional space (the minimum width and depth of balconies should be **1.5m**);
 - c. Provides a minimum amount of **private amenity space** of **5m²** per **1-2 person** unit and an extra **1m² per extra occupant** thereafter;
 - d. **All flatted developments** and developments of 10 or more houses **must provide a minimum of 10m²** per child of new **play space**, calculated using the

Mayor of London's population yield calculator and as a set out in Table 6.2 below. The calculation will be based on all the equivalent of all units being for affordable or social rent unless as signed Section 106 Agreement states otherwise, or an agreement in principle has been reached by the point of determination of any planning application on the amount of affordable housing to be provided. When calculating the amount of private and communal open space to be provided, footpaths, driveways, front gardens, vehicle circulation areas, car and cycle parking areas and refuse areas should be excluded; and

- e. Adherence with Supplementary Planning Document No.3: Designing for Community Safety or equivalent will be encouraged to aid compliance with the policies contained with the Local Plan.

7.4.6 However, the proposal does not provide dimensions of communal Open Space for occupants of **Units 3 to 6** who have no **Private Gardens Area**.

7.4.7 The identified **Play Space** for children of **Flats 3 to 6** (without private gardens) is a circular play area of **≈5m** (metres) Diameter which equals $Area = \pi * 5 = 15.71$ **sq.m.**

Unit	Probable Adults	Probable Children	Private Open Space (sq.m.)	Play Space Required (sq.m.)	Communal Play Space (required) (sq.m.)	Communal Play Space (Offered) (sq.m.)
Unit 1	2	2	51.2	20	0	0
Unit 2	2	2	24.2	20	0	0
Unit 3	2	1	6.5	10	10	15.71
Unit 4	2	2	7	20	20	
Unit 5	2	0	6	0	0	
Unit 6	2	1	7	10	10	
Totals	12	8	101.9	80	40	15.71

Application Data Assessment

7.4.8 **London Plan Policy S4**

7.4.8.1 The **London Plan** requires **Communal Play Space** should meet the requirements of **Policy S4 - Play and informal recreation**, for residential developments, incorporate good-quality, accessible play provision for all ages. At least **10 square metres** of **playspace** should be provided per child that:

- a) provides a stimulating environment
- b) can be accessed safely from the street by children and young people independently
- c) forms an integral part of the surrounding neighbourhood
- d) incorporates trees and/or other forms of greenery
- e) is overlooked to enable passive surveillance
- f) is not segregated by tenure

7.4.8.2 Therefore, the proposal Play Space for the probable **4 children** of **Flats 3 to 6** would require **40 sq.m.** when only **15.71 sq.m.** is offered - a deficiency of **24.29sq.m.** or **60.725%**.

7.5 Summary - Reason 2: Communal & Play Space

7.5.1 The proposal does NOT offer adequate Play Space for the probable number of children of Flats 3 to 6 which have no private garden. The requirement for the probable 4 children is 40 sq.m. when only 15.71 sq.m. is offered - a deficiency of 24.29sq.m. or 60.725%.

7.5.2 There is no defined requirement for Communal Open Space for Adult occupants of Flats or HMO's.

8 LPA Refusal Reason 3: Parking & Impact on highways

8.1 Refusal Reason 3

8.1.1 The proposed development would result in a detrimental impact on highways and pedestrian safety as a result of inadequate visibility splays, unsafe manoeuvring, inadequate parking provision and the absence of contributions to sustainable travel in the area, contrary to policies DM29 and DM30 of the Croydon Local Plan (2018) and T4, T6 and T6.1 of the London Plan (2021).

8.2 Case Officer's Report

8.2.1 **Para 5.30** A total of four car parking spaces would be accommodated within the front of the site. Policy T6.1 and Table 10.3 of the London Plan require a maximum provision of 1.5 spaces per unit in this location. The Council's transport officer has reviewed the information submitted. Whilst the applicant has submitted a parking survey, this has not been scoped with the Council. Given the very low PTAL, the level of parking spaces provided is not considered sufficient. The transport officer has confirmed that a minimum of 7 parking spaces would be required on site to accommodate the proposed flats. However, for the reasons discussed above, this level of parking and the required hardstanding would not be in-keeping with the existing character of the area. Furthermore, the proposal does not include the provision of any disabled persons parking bays, contrary to policy T6.1.

8.2.2 **Para 5.31** Swept path manoeuvring diagrams with details for a 4.8m car have not been provided to demonstrate whether vehicles can safely manoeuvre within the site. Furthermore, the sightlines shown on the site plan partially extend over the boundary with the adjacent property and are therefore unacceptable as there is no guarantee that the required sightlines could be maintained.

8.3 Appellant's Comments

- Whilst the London Plan set out a maximum provision of 1.5 spaces per unit for low ptal locations, this is guidance, and in its literal sense, is the 'maximum' provision. Officers agreed during pre-app that 4 spaces could be sufficient if supported by a parking survey, with or justification being that 4 spaces met the 2021 census in which 76% of households have a car, and only 54% of one person households; which equated to 4 full dwellings.
- Unfortunately, as the case officer did not provide written representation of their pre-app meeting advice, we were unable to engage their transport officer, but conducted a parking stress survey on their recommendation at the pre-application meeting; which met Lambeth methodology standards. This was best practice and an accepted standard by all London boroughs at the time of submission as detailed in the pre-app meeting.
- A combined parking stress of 23% was identified, with parking stress on Gladeside even lower at 17%. It's therefore reasonable to assume that any overspill on capacity from residents or visitors could very easily be consumed on-street with little impact to neighbours, residents, or highway safety.

- Whilst a transport assessment was not conducted, it should be mentioned that parking bays met standard, and had 6m manoeuvre distances which is widely accepted as the standard to be able to egress in forward gear, onto what is a 20mph road, not in a controlled parking zone, with a 17% parking stress, further aiding visibility. As such, swept paths were not provided.
- Whilst acknowledged that site lines extended over the neighbouring boundary, adjusting the parking site plan or the crossover would have required minimal amendment, and we feel that rejection for something which could have been amended if planners were willing to engage with us over the duration that the application remained undetermined, seems excessive and unfair.

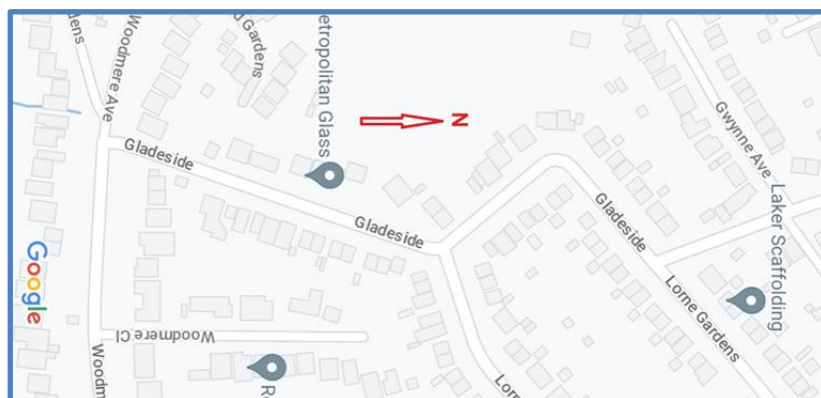
8.4 MORA Comments

8.4.1 The **London Plan** recommended Parking provision at **Outer London Sites** with **PTALs 0 to 2** (This location is PTAL 1a) for this **6 Unit** proposal is **1.5 spaces per dwelling = 12 spaces** and only **4 spaces** are provided.

Unit	Parking (Offered)	London Plan
Unit 1	1	1.5
Unit 2	1	1.5
Unit 3	1	1.5
Unit 4	1	1.5
Unit 5	0	1.5
Unit 6	0	1.5
Totals	4	12

8.4.2 There is also no provision for visitors. This therefore would be a likely overspill on-street parking in **Gladeside** of at least **8 vehicles**. These additional on-street parking, with no EVC's (Electric Vehicle charging) points, would add to the existing neighbourhood overspill and probably create further width restrictions making the route more hazardous for local drivers,

8.4.3 Gladeside is a residential road with falling levels from South to North with many blind corners and short distances between the corners and any on-street parking reduction of road width is considered quite dangerous for passing traffic.



Configuration of Street arrangement for Gladeside North to South.

8.4.4 London Plan Disabled persons parking should be provided for new residential developments. Residential development proposals delivering ten or more units must, as a minimum:

- 1) ensure that for three per cent of dwellings, at least one designated disabled persons parking bay per dwelling is available from the outset.

8.4.5 However, Para 10.6.9 states:

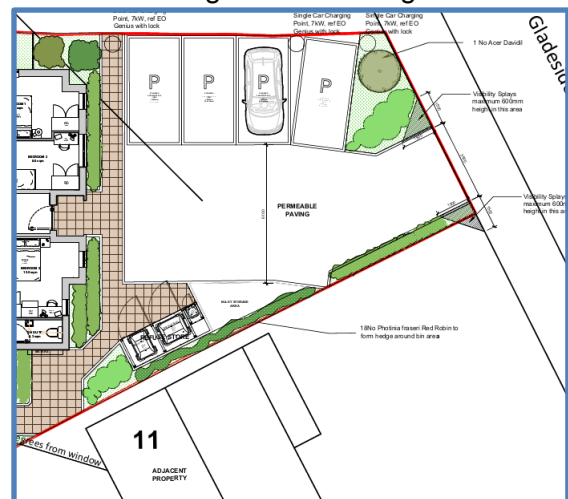
8.4.6 “The Mayor’s ambition is for London to be a city where it is easy for all disabled people to live and travel. Disabled people should have a genuine choice of housing that they can afford within a local environment that meets their needs. This means taking a holistic approach to creating streets, local services and a public transport network that caters for disabled people and people with long-term health conditions. It is recognised that some disabled people will rely on car travel more than others, whether as a passenger or a driver. This means that to ensure genuine housing choice, disabled persons’ parking should be provided for new residential developments. In some circumstances this may include visitor parking for disabled residents who might have regular visitors such as carers. Any such parking should be marked out as such and restricted only for these users from the outset.”

8.4.7 **Swept Path Diagrams**

8.4.7.1 The Appellant’s comments assume the 6m clearance for exiting from a parking bay is adequate for manoeuvrability. However, the left / right transitional space is not considered when exiting, if the vehicle is parked in a forward direction, the movement is restricted to parallel with the near or offside restriction. In this case, the parking bay nearest the building would probably create the need to swing the front on right lock such that the front of the vehicle would swing over the footpath. Once clear of the adjacent parked vehicle, a full left lock to position the vehicle rear toward the Bin store and the front toward the exit.

8.4.7.2 It is considered “Best Practise” to provide Swept Paths for All bays assuming all other bays are occupied, for parking in both a forward gear or reverse gear.

8.4.7.3 We have no further constructive comment to add to the Case Officer’s statements on the Sight Line’s issues.



9 The Planning Process and Conclusions

9.1 The foregoing 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 Local Residents have “**lost confidence in the Planning Process**” resultant on recent local **over-developments** and lack of additional supporting infrastructure, which, in the majority of cases, disregarded 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**.

- 9.3 Our comments on this Appeal are all supported by the **National or Local Planning Policies** which have defined measurable methodology and assessment. We do **NOT** quote any **subjective or vaguely** described objectives as they can be misconstrued to one's advantage or disadvantage but are not quantifiably conclusive. Therefore, our analysis is **definitive**.
- 9.4 We have conclusively shown that the proposed development would be detrimental to the street scene and character of the area by reason of the size, massing, footprint, form, and design and would thereby conflict with policies DM10 and SP4.1 of the Croydon Local Plan (2018) and D3 and D4 of the London Plan (2021) as supporting the reasons 1 for LPA refusal.
- 9.5 The Growth Policies as specified in the Croydon Local Plan are fundamentally flawed as they do NOT define the magnitude of "Growth" in their definitions. There is NO actual mechanistic difference between the different categories of '**Intensification**' or '**densification**'.
- 9.6 We have also shown that the proposed development is a significant overdevelopment for the available **Site Area** of **0.062505ha** at **PTAL 1a** in this **<Outer Suburban Area Type Setting (CR0 7RL)** as defined by the **National Model Design Code Guidance** and that the proposed development would be more appropriate in an **Urban Area Type Setting for Housing Density and a Central Area Type for Residential Density**. This analysis therefore supports the **LPA's Reasons 1 & 2** for refusal on grounds of **Scale, Massing and Bulk**.
- 9.7 The **National Model Design Code & Guidance** for '**Suburban**' **Area Types** provides clear guidance on Densities, **Area Types** (see previous comments) and the **Floor Area Ratios**. The '**Suburban**' **Floor Area Ratio (GIA/Site)** should be **<0.5** (less than) whereas the proposal has a **Floor Area Ratio** of $408.2 / 625.05 = 0.653$ i.e., **>0.5**, a **30.6% increase** on the maximum recommended.
- 9.8 This requirement of **Floor Area Ratio** provides a measurable requirement to ensure spaciousness surrounding the building within the Site to reflect the openness for the **Area Type Setting**. However, the proposal is in an area of **<Outer Suburban** which is two area types below **Suburban** i.e., **Suburban & Outer Suburban** and therefore **<0.5** is a high benchmark for **<Outer Suburban Area Type Floor Area Ratio (FAR)**.
- 9.9 We have also shown that the proposed development would provide a poor quality of residential accommodation by virtue of its inadequate communal and Play Space, contrary to policies D3 of the London Plan (2021) and policies SP2.8 and DM10 of the Croydon Local Plan (2018) and S2 of the London Plan supporting the LPA Refusal 2.
- 9.10 We have also shown that the proposed development would result in a detrimental impact on highways and pedestrian safety in Gladeside as a result of inadequate visibility splays, unsafe manoeuvring, inadequate parking provision and the absence of contributions to sustainable travel in the area, contrary to policies DM29 and DM30 of the Croydon Local Plan (2018) and T4, T6 and T6.1 of the

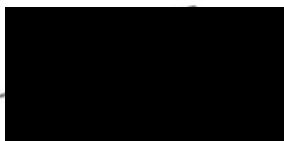


London Plan (2021) in support of the LPA reason for Refusal 3.

- 9.11 If the Inspector does NOT agree with the **National Model Design Code Guidance** as listed above, we would respectfully request the Inspector provides an alternative assessment with detailed methodology and justification as to why Croydon should be any different to the National Guidance.
- 9.12 *If this proposal is allowed, it would be absurd to believe that the 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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