

Victoria Bates - Case Officer
Development Management
Development and Environment
6th Floor
Bernard Weatherill House
8 Mint Walk
Croydon
CR0 1EA

**Monks Orchard Residents'
Association
Planning**

10th January 2024

Emails:

victoria.bates@croydon.gov.uk
Development.management@croydon.gov.uk
dmcomments@croydon.gov.uk

Emails:

planning@mo-ra.co
chairman@mo-ra.co
hello@mo-ra.co

Reference: **23/04017/FUL**
Application Received: Mon 23 Oct 2023
Application Validated: Tue 02 Jan 2024
Address: **8A Oak Way Croydon CR0 7ST**
Proposal: Demolition of the existing bungalow and the proposed erection of 2 x semi-detached houses and a bungalow with associated car parking, refuse storage, cycles storage and landscaping
Status: Awaiting decision
Case Officer: Victoria Bates
Consultation deadline: Thu 25 Jan 2024

Dear Victoria Bates – Case Officer

Please accept the following **MORA** assessment of the proposed Planning Application **Reference: 23/04017/FUL** for **8A Oak Way CR0 7ST**.

Only information pertinent to this “Review” of the proposal has been extracted from the Applicant’s submissions and if necessary, reproduced in this document for the purposes of “Fair Dealing” for analysis and assessment.¹

Proposal’s Parameters:

8A Oak Way CRO 7ST			App Ref: 23/04017/FUL												
Site Area (App Form)	1,006.00	sq.m.	Parameter		Proposal	Existing	Units					PTAL	2011	1a	0.66
Floor Area Ratio (FAR)	0.1006	ha	Residential Density		119.28	39.76	bs/ha					PTAL	2021	1a	0.66
Plot Area Ratio (PAR)	0.21		Housing Density		29.82	9.94	U/ha					PTAL	2031	1a	0.66
Plot Area Ratio (PAR)	0.25		Occupancy		4.00	4.00									
Unit	Type	Floor	Bedrooms (b)	Bed Spaces (bs)	GEA (Offered) (Scaled-off Plans)	GIA (Offered)	GIA Required (Table 3.1)	GIA (Required) (Table A1.1 Best Practice)	In-Built Storage (Offered)	In-Built Storage Required (Table 3.1)	In-Built Storage (Required) (Table A1.1 Best Practice)	Probable Children	Play Space Requirtd (sq.m.)	Amenity Space (sq.m.)	Car Parking (Offered)
Unit 1	Semi Detached	Ground	0	0	51.6	38.25	70	76	2.00	2.00	2.50	1	10.00	97	1
		First	2	3											
Unit 2	Semi Detached	Ground	0	0	51.6	38.25	70	76	2.00	2.00	2.50	1	10.00	12.4	1
		First	2	3											
Total			4	6	103.2	76.5	140	152	4	4	5	2	20	109.4	2
Unit 3	Bungalow	Ground	3	6	144	130	95	107	3	2.5	3	4	40	336	1
Grand Total			7	12	247.2	206.5	235	259	7	6.5	8	6	60	445.4	3
Existing			Note 1		As measure from plans										
Unit	Bungalow	Ground	2	4	97.68	84.075									
Note 1			Bedroom 3 is only 6 sq.m. In total Area and therefore inadequate for a single sized Bedroom (A single sized Bedroom ≥7.5 sq.m. Policy D6)												

¹ https://assets.publishing.service.gov.uk/media/5a80f292ed915d74e6231597/Exceptions_to_copyright_-_Guidance_for_consumers.pdf

1 Initial Observations:

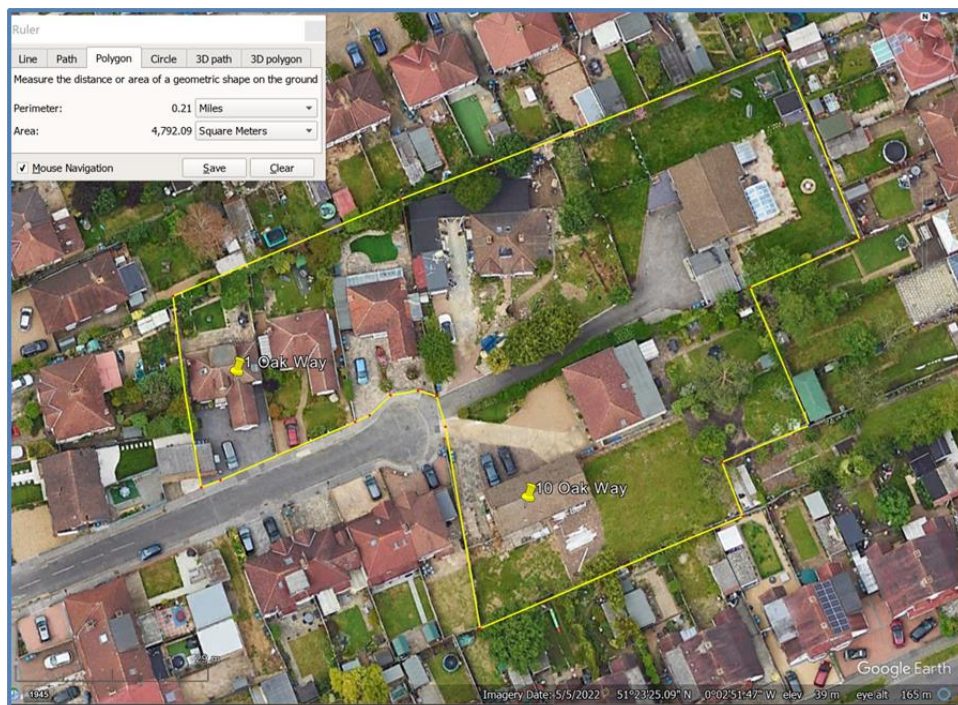
- 1.1 On first analysis, this proposal would seem to be in keeping with the local character of Semi-detached dwellings and Bungalows, and without further detailed assessment could be a welcome change to the high-density proposals of late.
- 1.2 The proposal is to be tested by further detailed analysis and an appropriate stance assessed.

2 Design Code Assessment

- 2.1 The local area **Design Code** requires to be identified and the proposal assessed against its compliance to this proposals **local Design Code** within reasonable tolerance.
- 2.2 The **Croydon Local Plan** has no guidance on **Local Design Codes** as required by the **NPPF (2021 and September 2023)** at **para 129** and the more recent **NPPF (December 2023)** at **paras 130 and Section 12 para 134**.
- 2.3 **Design Code Guidance** is provided by the **National Model Design Code & Guidance (NMDC&G)** published by the **Department for Levelling Up, Housing & Communities (DLUHC)** at **Part 1 of the NMDC&G at Section 2.B page 14** which defines **Area Types** as:

Outer Suburban Area Type :-	20 Units/ha to 40 Units/ha
Suburban Area Type :-	40 Units/ha to 60 Units/ha
Urban Area Type :-	60 Units/ha to 120 Units/ha
Central/Town Area Type :-	≥120 Units/ha and above

- 2.4 The **Local Area** assessment to define the **Local Design Code** requires an analysis of the **area** into which the proposal is to be sited.



Google Earth Polygon measurement of Post Code CR0 7ST

2.5 The simplest analogy to define the **Local Design Code acceptability** is to assess the local **Post Code Area** and compare the **Post Code Design Codes** with the proposal **Design Code parameters** as we know of no other **area** designations for which the appropriate parameter data are defined or are available for assessment.

2.6 **Post Code CR0 7ST embraces 11 dwellings from 1 to 10 Oak Way (including 8A Oak Way),² housing 29 Persons³ within a total Area of ≈4,792.09sq.m. ≈ 0.47921ha (see Google Earth below).**

Parameters of Post Code Design Code			
Area Design Code Parameter	Existing	Proposal	
<i>(These parameters auto calc Design Code)</i>			
Post Code (1 to 10 Oak Way)	CR0 7ST	CR0 7ST	
Area of Post Code (ha)	0.47921	0.47921	hectares
Area of Post Code (Sq.m)	4792.09	4792.09	sq.m.
Number of Dwellings (Units) (*)	11	13	Units
Number of Occupants (Persons) 4th April 23 (**)	29	37	Persons
Post Code Housing Density	22.95	27.13	Units/ha
Post Code Residential Density	60.52	77.21	Bedspaces/ha
Occupancy	2.64	2.85	Persons/Unit
Area Type (NMDC&G) Housing	Outer Suburban	Outer Suburban	Area Type Setting
Area Type (NMDC&G) Residential (***)	Outer Suburban	Outer Suburban	Area Type Setting
(*) Last updated on 3 January 2024			
(**) https://www.postcodearea.co.uk/			
(***) Based on National Unit Occupancy of 2.36 persons/Unit			

Post Code Design Code parameters – Existing & as result of proposal

2.7 **Application Design Code Assessment.**

Application Design Code Details			
Application Ref:	23/04017/FUL		
Address	8a Oak View		
PostCode	CR0 7ST		
Parameters	Existing	Proposal	Units
Site Area (ha)	0.1006	0.1006	ha
Site Area (sq.m.)	1006.00	1006.00	sq.m.
Gross External Area (GEA) (sq.m.) (scaled off plans)	97.68	247.20	sq.m.
Gross Internal Area (GIA) (sq.m.)	84.08	206.50	sq.m.
Garden Area (sq.m.)	908.32	758.80	sq.m.
Floor Area Ratio (FAR)	0.08	0.21	
Plot Area Ratio (PAR)	0.10	0.25	
Units (Dwellings)	1	3	Units
Bedrooms	2	7	Bedrooms
Bedspaces	4	12	Persons
Housing Density	9.94	29.82	Units/ha
Residential Density	39.76	119.28	bs/ha
Occupancy	4.00	4.00	P/Unit
National Average Occupancy	2.36	2.36	P/Unit
NMDC&G Area Type Setting (Units/ha)	<Outer Suburban	Outer Suburban	
Area Type Setting (Bedspaces/ha) ²	<Outer Suburban	Suburban	
² Based upon latest (2021) National Average Occupants/Dwelling (2.36)			

Assessment of Application Design Code Details Existing and proposal

² [Search results for CR0 7ST - Check and challenge your Council Tax band - GOV.UK](https://www.gov.uk/search/results/cr0-7st-check-and-challenge-your-council-tax-band)

³ <https://www.postcodearea.co.uk/postaltowns/croydon/cr07st/>

2.8 **Post Code Design Code Comparisons as a result of Application proposal.**

Comparison - Post Code (CR0 7QY) Design Code as result of Application Proposal			
	Existing	Proposal	% Uplift
Housing Density:			
Post Code Housing Density (Units/ha)	22.95	27.13	18.21%
Application Housing Density (Units/ha)	9.94	29.82	200.00%
Percentage Increase (%)	-56.69	9.92	
Residential Density:			
Post Code Residential Density (bs/ha)	60.52	77.21	27.58%
Application Residential Density (bs/ha)	39.76	119.28	200.00%
Percentage Increase (%)	-34.30	54.49	
Public Transport Accessibility Level (PTAL):			
PTAL Available (1a)	0.66	0.66	0.00%
PTAL Required (Post Code)	0.34	0.76	123.53%
Percentage Increase (%)	-48.48	15.15	
Occupancy:			
National Average Occupancy	2.36	2.36	0.00%
Post Code Occupancy	2.64	2.85	7.95%
Application Occupancy	4.00	4.00	0.00%
Percentage Increase (%)	51.52	40.35	

Illustration of Uplift of Post Code Design Code parameters resultant on Proposal

2.9 The Table above provides a summary of the increases and percentage uplift in **Design Code Parameters** resulting on the proposal for assessment. The percentage uplift to the **Post Code Design Codes** of **18.21% Housing** and **27.58% Residential Densities** do not significantly change the **Area Types**.

2.10 The **Post Code Area Type** prior to and after the proposal would remain **Outer Suburban** and the existing Application **Site Area Type** would increase from **<Outer Suburban to Outer Suburban** as defined by the **MNMDC&G** considered to be within the objectives of **NPPF (Dec 2023) para 135 sub paras a) to c)**.

135. Planning policies and decisions should ensure that developments:

- 2.1 will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- 2.2 are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- 2.3 are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or ...

2.11 The Dwelling Types of **Bungalow and Semi-Detached** dwellings respect the character of the locality, and the layout reflects the surrounding character of the immediate area. The increase in **Residential Density of 200%** is the only critical **Design Code** issue which may be considered inappropriate as the proposal location has very low **Public Transport Accessibility at PTAL 1a** (assumed numerically \equiv 0.66).

2.12 As there is now no guidance to the relationship between **Area Type, Housing, Residential Density** and **PTAL** due to the omission of the **London Plan Density Matrix**, an alternative assessment is necessary.

2.13 It is assumed that Public Transport accessibility should be proportionate to the local **Residential Density** over the full range of **Area Types** as there is no other comparison available.

2.14 Thus, until TfL establishes further guidance on the assessment of **PTAL** by statistical variable modification to a Linear progression, we have the following assessment based on the **Residential Density** at **Outer Suburban Area Type** at **Zero (minimum) PTAL** to a **Central Area Type** at **(maximum) PTAL 6** should be a **linear** proportionate increase progression. With a **National Unit** of occupation of **2.36 persons/Unit**,⁴ the **Area Type** in **National Housing Density** can be converted to **National Residential Density** by a factor of **2.36**.

Area Type	Housing Density	=	Residential Density
Outer Suburban:	20u/ha to 40u/ha	=	47.2p/ha to 94.4p/ha
Suburban:	40u/ha to 60u/ha	=	94.4p/ha to 141.6p/ha
Urban:	60u/ha to 120u/ha	=	141.6p/ha to 283.2p/ha
Central:	≥120u/ha	=	≥283.2p/ha

2.15 Therefore, the incremental linear progression is from an **Outer Suburban Area Type** at **20 Units/ha Housing Density** = 20 x 2.36 = **Residential Density** of **47.2 persons/ha** to a **Central Area Type** at **120Units/ha Housing Density** = 120 x 2.36 = **Residential Density** of **283.2persons/ha**.

2.16 This simple analysis allows a simple assessment of **PTAL** by the simple function of:

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

Over the **Residential Densities** of **47.2p/ha** at **PTAL Zero** to **283.2p/ha** at **PTAL 6**.

Thus, at the available local **PTAL** of **0.66**, the appropriate **Residential Density** would be:

$$\text{Residential Density} = \left(\frac{283.2 - 47.2}{6 - 0} \right) * 0.66 + 47.2 = 39.33 * 0.66 + 47.2$$

$$25.96 + 47.2 = 73.16 = \mathbf{73.16 \text{ persons/ha (Outer Suburban)}}$$

2.17 The actual **Post Code** prior to the proposal has a **Residential Density** of **60.52 persons/ha**. Therefore:

$$\text{Residential Density} = 60.52 = \left(\frac{283.2 - 47.2}{6} \right) * x + 47.2$$

$$\therefore x = \left(\frac{60.52 - 47.2}{39.33} \right) = \mathbf{0.33867 \text{ PTAL} \approx \mathbf{PTAL 0.34}}$$

2.18 The actual Post Code resultant of the proposal has a **Residential Density** of **77.21 persons/ha**. Therefore:

$$\text{Residential Density} = 77.21 = \left(\frac{283.2 - 47.2}{6} \right) * x + 47.2$$

$$\therefore x = \left(\frac{77.21 - 47.2}{39.33} \right) = \mathbf{0.763 \text{ PTAL} \approx \mathbf{PTAL 0.76}}$$

Which is only 0.1 above that currently available at 0.66.

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

2.19 The Existing Application has a **Residential Density** of **39.76 persons/ha**. Therefore:

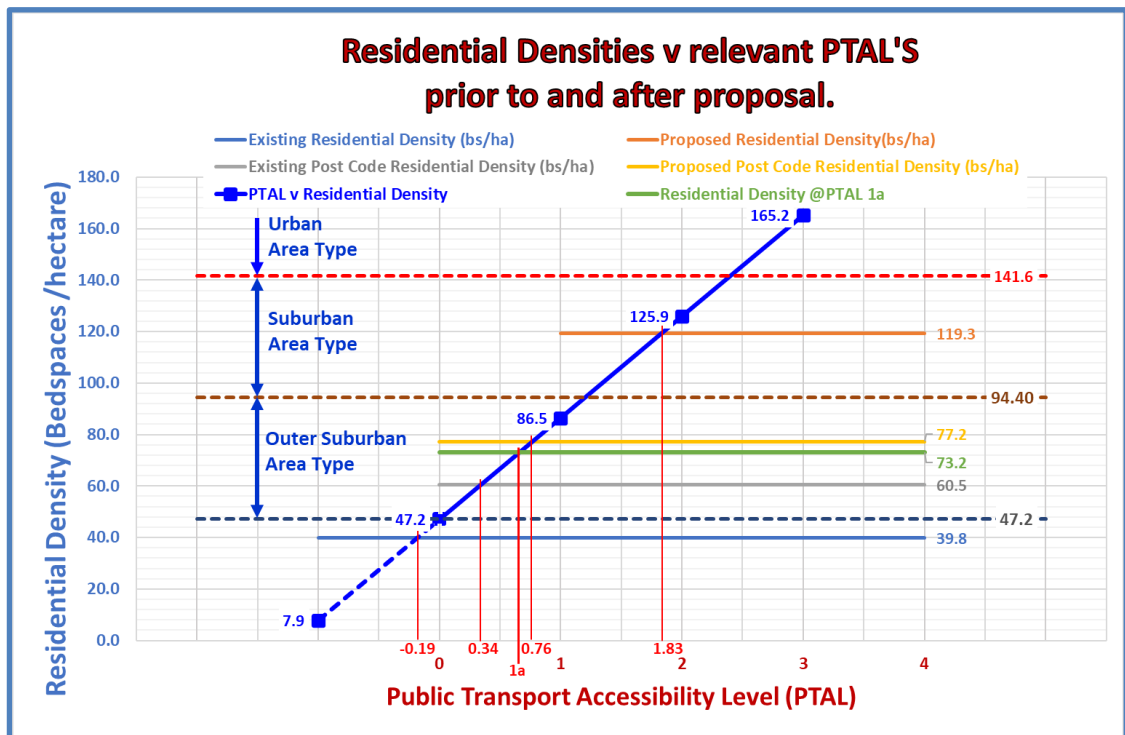
$$\text{Residential Density} = 39.76 = \left(\frac{283.2 - 47.2}{6} \right) * x + 47.2$$

$$\therefore x = \left(\frac{39.76 - 47.2}{39.33} \right) = -0.189 \text{ PTAL} \approx \text{PTAL } -0.19$$

2.20 The Proposed Application has a **Residential Density** of **119.28 persons/ha**. Therefore:

$$\text{Residential Density} = 119.28 = \left(\frac{283.2 - 47.2}{6} \right) * x + 47.2$$

$$\therefore x = \left(\frac{119.28 - 47.2}{39.33} \right) = 1.8326 \text{ PTAL} \approx \text{PTAL } 1.83$$



Graphical illustration of the calculations above.

3 Site Capacity

3.1 The London Plan Policy D3 - Optimising site capacity through the design-led approach

3.1.1 The **London Plan Guidance (LPG) Optimising Site Capacity**: the Design Led Approach (June 2023), includes a **Site Capacity Toolkit** for residential developments. The Toolkit is mainly designed for major developments of multiple Housing Types and tenures but para 5.1.2 of the SPG does indicate that alternative assessments can be made based upon the concepts of the design guide toolkit.

3.1.2 We have therefore developed a simple spreadsheet which assesses the **Site Capacity** based upon the defined policies and requirements of the proposal. The most significant parameter that differs across the **Area Types** is the **Average Amenity Space** (Garden Space) for the **Area Type Setting** which differentiates the **Area Type Settings**.

3.1.3 As there are no defined Plot Boundaries between Units 1 & 2 (Frontages) and between Unit 2 & Unit 3 Frontage, it is not possible to define the actual individual Plot Areas for each Unit. This may become an issue when Tenure is decided, in order to differentiate grounds maintenance responsibilities.

3.2 Interactive Site Capacity Spreadsheet

Indicative London Plan Policy D3 - Optimising Site Capacity & H2 - Small Site Capacity Calculator:														
Input Parameters														
Existing Site Area (hectares)	Existing Site Area (sq.m.)	Existing GEA (Footprint) (Scaled-off Plans)	Play Space per Child (sq.m.)	Car Parking Standard (per space) (sq.m.)	Parallel Parking (per space) (sq.m.)	Car Park Standard with EVC (Per Space) (sq.m.)	Car Parking (Disabled Bays) (Per Space) (sq.m.)	Cycle Rack Storage (two bikes) (sq.m.)	Refuse Eurobin (1280L) Storage (per Bin) (sq.m.)	Refuse Eurobin (1100L) Storage (per Bin) (sq.m.)	Refuse Eurobin (660L) Storage (per Bin) (sq.m.)	Refuse Eurobin (360L) Storage (per Bin) (sq.m.)	Refuse Eurobin (240L) Storage (per Bin) (sq.m.)	Refuse Eurobin (180L) Storage (per Bin) (sq.m.)
0.1006	1,006.00	118.39	10	12.5	12	14	18	1.71	1.25	1.23	0.90	0.53	0.53	0.43
Unit	Site Area (sq.m.)	Footprint or GEA (includes GIA & Built-In Storage)	Number of Storeys (#)	Bedrooms (b)	Bedspaces (bs)	GIA Required (Best Practice) (sq.m.)	In-built Storage (Best Practice) (sq.m.)	Private Amenity Space (Required) (sq.m.)	Probable Adults	Probable Children	Play Space Required (sq.m.)	Refuse Bin Storage	Cycle Storage	Car Parking (London Plan)
Unit 1		51.60	2	2	3	76	2.5	6	2	1	10	1.49	3.42	21.00
Unit 2		51.60	2	2	3	76	2.5	6	2	1	10	1.49	3.42	21.00
Unit 3		144.00	1	3	6	107	3	9	2	4	40	1.49	5.13	21.00
Totals	1006.00	247.20		7	12	259	8	21	6	6	60	4.47	11.97	63
Proposal	GIA Required (Best Practice) (sq.m.)	Footprint or GEA (includes GIA & Built-In Storage)	Play Space	Private Amenity Space (Required) (sq.m.)	Communal Amenity Space (Required)	Parking Spaces (sq.m.)	Cycling, Storage (sq.m.)	Refuse Bin Storage	Required Area (sq.m.) (including GEA)	Available Site Area (sq.m.)	Site Capacity Ratio (Available / Site Area)	Floor Area Ratio (GIA/Site Area) Best Practice		
Unit 1	76.00	51.60	10	6	-	21.00	3.42	1.49	93.51					
Unit 2	76.00	51.60	10	6	-	21.00	3.42	1.49	93.51					
Unit 3	107.00	144.00	40	9	-	21.00	5.13	1.49	220.62					
Total	259.00	247.20	60.00	21.00	0.00	63.00	11.97	4.47	407.64	1006.00	0.41	0.25		
Assessment Building A	Plot Area Type Ratios	Percentage of Site for Garden	Site Area available (sq.m.)	Appropriate Garden Area (sq.m.)	GEA plus Required Areas (sq.m.)	Required Site Area (sq.m.)	± Site Capacity	Optimised % Site Capacity						
<Outer Suburban	0.25	75.0%	1006.00	754.50	407.64	1162.14	-156.14	-15.52%						
Outer Suburban	0.375	62.5%	1006.00	628.75	407.64	1036.39	-30.39	-3.02%						
Suburban	0.5	50.0%	1006.00	503.00	407.64	910.64	95.36	9.48%						
Urban	0.75	25.0%	1006.00	251.50	407.64	659.14	346.86	34.48%						
Cental	1	0.0%	1006.00	0.00	407.64	407.64	598.36	59.48%						

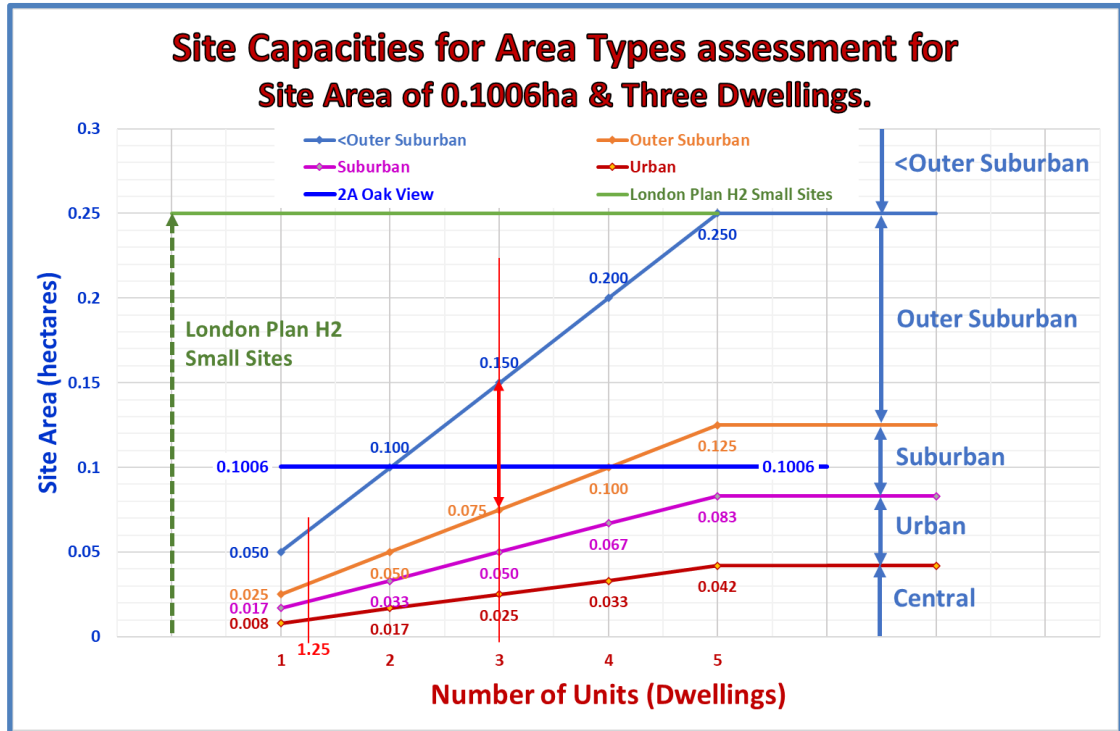
Interactive Site Capacity Spreadsheet

3.2.1 The interactive spreadsheet calculates the **Site Capacity** is just 3.02% short of the actual required minimum **Site Area** for an **Outer Suburban Area Type** setting. This works out at **30.39sq.m.** short which we believe is not sufficient to be the only reason found for a **refusal**. This is only **30.39sq.m.** deficient from the calculated required **1036.39sq.m.** for an outer **Suburban Area Type** Setting.

3.3 Site Capacity Area Type Requirement.

3.3.1 An alternative method of defining the appropriate **Site Capacity** is based upon the **Area Type** Assessment as defined by the **NMDC&G**. The locality of **CR0 7ST** is an **'Outer Suburban'** Area Type in the range **20 to 40Units/ha**.

3.3.2 The proposal, at of three (3) Units in an area of 0.1006ha would equal a Housing Density of $3/0.1006 = 29.821\text{Units/ha}$ which places the proposal in an **'Outer Suburban'** Area Type in the range **20 to 40Units/ha**. i.e. equal to the locality as define by the Post Code Design Code.



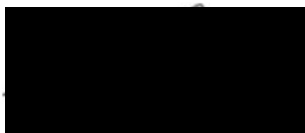
Area Type Site Capacities

3.3.3 The above graphical illustration shows the ranges of **Site Area** in hectares for each **Area Type** for 1 to 5 **Dwellings**. For 3 **dwellings** in an **Outer Suburban Area Type** the **Site** must be between **0.075 to 0.150 hectares**. The proposal at **0.1006ha** clearly meets the **Area Type** setting of the locality as defined by the local **Post Code Design Code CR0 7ST** of **Outer Suburban**.

4 Summary and Conclusions

4.1 We have assessed the various Design Code parameters, and the overall assessment is that the proposal generally meets the objectives of the main policy requirements or are within acceptable tolerance limits and would provide welcomed family dwellings. We therefore register a **"Neutral"** Stance for Officers to make a decision based on their professional assessment.

Derek Ritson



Derek C. Ritson I. Eng. M I E T.
Monks Orchard Residents' Association
Executive Committee – Planning
Email: planning@mo-ra.co

Cc:

Cllr. Sue Bennett
Cllr. Richard Chatterjee
Cllr. Mark Johnson

Bcc:

MORA Executive Committee, Local Affected Residents', Interested Parties



Sony Nair
Chairman MORA
Monks Orchard Residents' Association.
Email: chairman@mo-ra.co

Shirley North Ward
Shirley North Ward
Shirley North Ward