

Christopher Grace – Case Officer
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Bernard Weatherill House
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Croydon
CR0 1EA

**Monks Orchard
Residents' Association
Planning**

23rd January 2024

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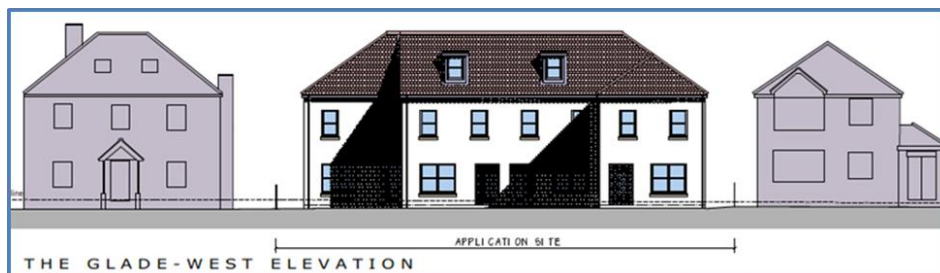
Reference:	23/04740/FUL
Application Received	Thu 21 Dec 2023
Application Validated	Thu 21 Dec 2023
Address:	46 The Glade Croydon CR0 7QD
Proposal:	Demolition of existing property and construction of 2 no. 3 bedroom houses and 2 no. 2 bedroom houses in a terrace with parking spaces.
Status:	Awaiting decision
Consultation Expiry:	Sat 27 Jan 2024
Determination:	Thu 15 Feb 2024
Case Officer:	Christopher Grace

Dear Mr Grace – Case Officer,

Please accept this letter as a formal objection to **Application Ref: 23/04740/FUL** for Demolition of existing property and construction of 2 no. 3 bedroom houses and 2 no. 2 bedroom houses in a terrace with parking spaces.

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: Front Elevation



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

We understand the need for additional housing, but that new housing developments and Residential Extensions & Alterations must be **sustainable**, meet the **current and emerging planning policies** and to reflect the character of the locality ensuring future occupants have **acceptable living standards** and appropriate supporting **Infrastructure and Public Transport**.

The Proposed Parameters: There are two options for this proposal.

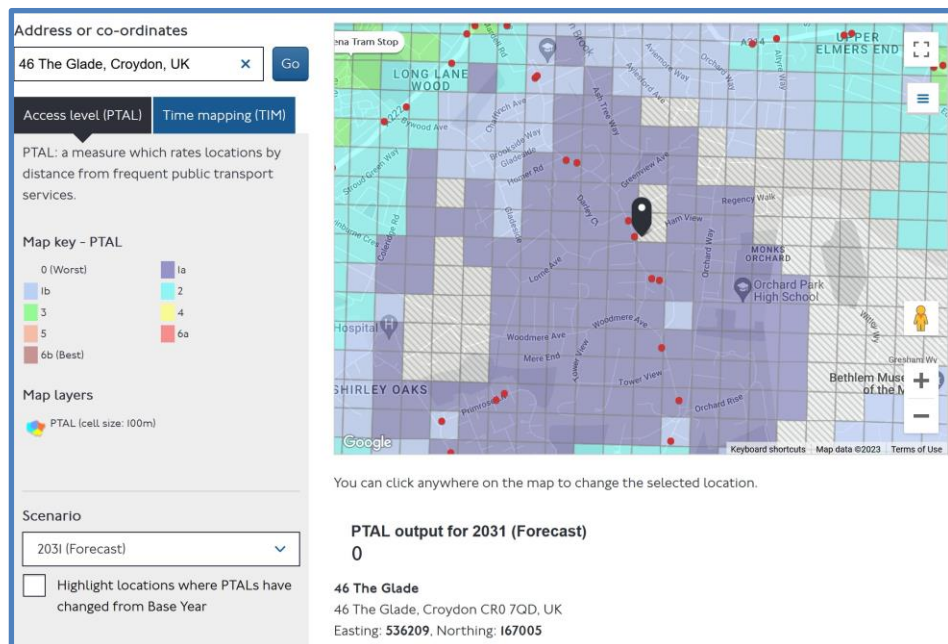
46 The Glade			App Ref: 23/04740/FUL					Option 1 - First Floor 2 Bedrooms and an Office/study						
Site Area	1020	sq.m.	Supplied Drawings					Floor Area Ratio		0.40	Post Code	CR0 7QD		
App Form	0.102	ha	Bedrooms Density	98.04	b/ha	Plot Area Ratio	1.51	Area	1.51	ha				
Footprint	322.24	sq.m.	Residential Density	196.08	bs/ha	PTAL	2011	Persons	68	(persons)				
Units	4		Housing Density	39.22	U/ha	PTAL	2021	Dwellings	24	(Units)				
			Average Occupancy	5.00	bs/unit	PTAL	2031	0						
Unit	Type	Floor	Bedrooms (b)	Option 1 Bed Spaces (bs)	GIA (Offered)	GIA (Required) (Table 3.1)	GIA Table A1.1 (Best Practice)	In-Built Storage (Offered) (Note 1)	In-Built Storage (Required)	In-Built Storage (Best Practice)	Amenity Space (Required)	Probable Adults	Option 1 Probable Children	Play Space (Required) (sq.m.)
Unit 1	Terraced M4(2)	Ground	0	0	66.8	79.00	86.00	not stated	2.00	2.50	7.00	2	2	20
		First	2	4	53.9			not stated						
Sub Totals			2	4	120.7	79.00	86.00	not stated	2.00	2.50	7	2	2	20
Unit 2	Terraced M4(2)	Ground	0	0	66.8			not stated	2.50	3.00	9.00	2	4	40
		First	2	4	53.9	108.00	120.00	not stated						
		Second	1	2	35.4			not stated						
Sub Totals			3	6	156.1	108.00	120.00	not stated	2.50	3.00	9	2	4	40
Unit 3	Terraced M4(2)	Ground	0	0	66.8			not stated	2.50	3.00	9.00	2	4	40
		First	2	4	53.9	108.00	120.00	not stated						
		Second	1	2	35.4			not stated						
Sub Totals			3	6	156.1	108.00	120.00	not stated	2.50	3.00	9	2	4	40
Unit 4	Terraced	Ground	0	0	66.8			not stated	2.00	2.50	7.00	2	2	20
		First	2	4	53.9	79.00	86.00	not stated						
Sub Total			2	4	120.7	79.00	86.00	not stated	2.00	2.50	7	2	2	20
Grand Total			10	20	553.6	374	412		9	11.5	32	8	12	120
Option 1 - First Floor Office/Study														
Note 1: Built-In Storage Space on floor plans if shown have no dimensions, Also Built-In Storage Space Not mentioned in the Design & Access Statement.														
Note 2: Study is 7.7sq.m. as measured off scaled Plans and is therefore barely large enough for a single bed (≥7.5sq.m.)														
46 The Glade			App Ref: 23/04740/FUL					Option 2 - First Floor 3 Bedrooms.						
Site Area	1020	sq.m.	Supplied Drawings					Floor Area Ratio		0.47	Post Code	CR0 7QD		
App Form	0.102	ha	Bedrooms Density	137.25	b/ha	Plot Area Ratio	0.00	Area	1.51	ha				
Footprint	0	sq.m.	Residential Density	235.29	bs/ha	PTAL	2011	Persons	68	(persons)				
Units	4		Housing Density	39.22	U/ha	PTAL	2021	Dwellings	24	(Units)				
			Average Occupancy	6.00	bs/unit	PTAL	2031	0						
Unit	Type	Floor	Bedrooms (b)	Option 2 Bed Spaces (bs)	GIA (Offered)	GIA (Required) (Table 3.1)	GIA Table A1.1 (Best Practice)	In-Built Storage (Offered) (Note 1)	In-Built Storage (Required)	In-Built Storage (Best Practice)	Amenity Space (Required)	Probable Adults	Option 2 Probable Children	Play Space (Required)
Unit 1	Terraced M4(2)	Ground	0	0	66.8	93.00	104.00	not stated	3.00	3.50	8.00	2	3	30
		First	3	5	53.9			not stated						
Sub Totals			3	5	120.7	93.00	104.00	not stated	3.00	3.50	8	2	3	30
Unit 2	Terraced M4(2)	Ground	0	0	66.8			not stated	3.50	4.00	10.00	2	5	50
		First	3	5	53.9	121.00	134.00	not stated						
		Second	1	2	35.4			not stated						
Sub Totals			4	7	156.1	121.00	134.00	not stated	3.50	4.00	10	2	5	50
Unit 3	Terraced M4(2)	Ground	0	0	66.8			not stated	3.50	4.00	10.00	2	5	50
		First	3	5	53.9	121.00	134.00	not stated						
		Second	1	2	35.4			not stated						
Sub Totals			4	7	156.1	121.00	134.00	not stated	3.50	4.00	10	2	5	50
Unit 4	Terraced	Ground	0	0	66.8			not stated	3.00	3.50	8.00	2	3	30
		First	3	5	53.9	93.00	104.00	not stated						
Sub Total			3	5	120.7	93.00	104.00	not stated	3.00	3.50	8	2	3	30
Grand Total			14	24	553.6	428	476		13	15.5	36	8	16	160
Option 2 Bedroom #4 - Single Bedroom Not used as Office. (Dimensions Just 7.7sq.m. as measured from plans Policy D6 requires ≥7.5 sq.m.)														
Note 1: Built-In Storage Space on floor plans if shown have no dimensions, Also Built-In Storage Space Not mentioned in the Design & Access Statement.														
Note 2: Bed 2 is 7.7sq.m. as measured off scaled Plans and is therefore barely large enough for a single bed (≥7.5sq.m.)														

1 Initial Comments and Observations

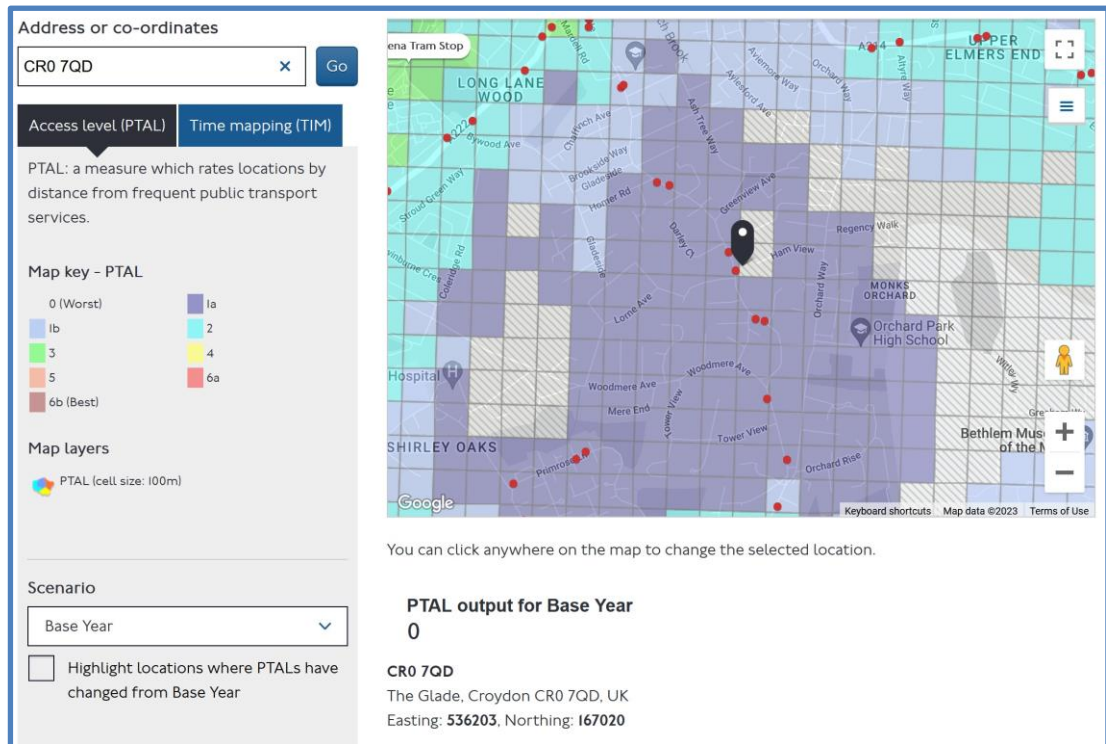
1.1 We only object to proposals which do not comply with current adopted or emerging planning policies, designed to minimise overdevelopment and retain the local character within acceptable constraints, or where policies are 'vaguely' specified with 'subjective' varying interpretations. The objective is for developments of the "Right Type in the Right Place". (NPPF Para 8 a).

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- 1.2 The proposal has **two options** for accommodation:
- **Option 1** first floor offers **2b4p** and an **Office/Study** and;
 - **Option 2** first floor offers **3b5p** accommodation.
- 1.3 The relevant Planning Policies are:
- The **NPPF** (December 2023)
 - The **Department for Levelling Up, Housing and Communities (LUHC) National Model Design Codes and Guidance** Documents published (January 2021 & June 2021);
 - The **London Plan** (March 2021)
 - **London Plan** Small Site Design Codes (LPG) June 2023
 - **London Plan** Housing Design Standards (LPG) June 2023
 - **London Plan** Optimising Site Capacity (LPG) June 2023
 - **London Plan** Characterisation & Growth Strategy (LPG) June 2023.
 - The **Croydon Local Plan** (2018)
 - The **Draft Revised Croydon Local Plan** (November 2021 Not yet adopted)
- 1.4 The **Design & Access Statement** at “**Schedule of Accommodation**” (page 9 of 14) states “**2 No 3 bedroom 4-persons M4(2) Compliant Dwellings and 2 No 2 Bedroom 4 Person M4(2) compliant dwellings 3 Bedroom 4-person**”;
- 1.5 The actual **Floor Plans** show **Units 1 & 4** are **2b/4p** and **Units 2 & 3** are **3b/6p** which we have listed as **Option 1**; or if **Bedroom 4** is used as an **Office/Study**, would increase occupancy to **3b/5p & 4b/7p** which we have listed as **Option 2** in our assessment and submission. (See Proposed parameters in the spreadsheet above).
- 1.6 **Public Transport Accessibility**



WebCAT response to the Address at 46 The Glade shows PTAL 0 (Zero)



TfL WebCAT search returns PTAL 0 for Post Code CR0 7QD.

- 1.6.1 **There is No Public Transport Statement to support this proposal.**
- 1.6.2 The TfL WebCAT ² returns **Zero (0)** at Base Year 2011, & 2021 & Forecast 2031 for **46 The Glade**. However, paragraph 5.42 of the **Planning Statement** states:
- *“The site has a “PTAL” rating of “1”, which indicates below average connectivity to the public transport network in comparison to other parts of London Table 10.3 confirms that the maximum parking provision in an “Outer London borough with a PTAL rating of 0-1 is up to 1.5 car parking spaces per unit.”*
- 1.6.3 As it is possible to *‘click anywhere on the WebCAT Map to select a location’* (see note on the returned WebCAT result illustration above) the **Applicant has moved the location slightly westward & southward to indicate a PTAL of 1(a).**
- 1.6.4 The **PTAL** for this site is nevertheless, **“ZERO”** and in order to show PTAL 1, the applicant has provided false information as with all previous applications throughout the preceding five applications for this site, which has been brought to the **Case Officer’s** attention at every submission which has been ignored. This assessment is based on the TfL Accessibility analysis even though there is a Bus Stop outside 48 The Glade.

² <https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcat/webcat?Input=46%20The%20Glade%2C%20Croydon%2C%20UK&locationId=ChIJH7h7rVUAdkgRePS6jfuACpc&scenario=2031%20%28Forecast%29&type=Ptal>

1.6.5 Development Management do not seem to assess whether the **PTAL** is appropriate for a **proposal**, perhaps due to the fact that there is no guidance in the **Croydon Local Plan (2018)** which is now 6 years out-of-date and virtually irrelevant.

1.6.6 The Applicant for this application and all the preceding five applications for this Site, has purposely manually manipulated the **PTAL WebCAT** responses to show an **erroneous PTAL** to provide false information to assist gaining approval for the Applicant's proposals.

2 Policy D3 Optimising site capacity through the design-led approach.

2.1 The design-led approach

A All development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth, and existing and planned supporting infrastructure capacity (as set out in Policy D2 Infrastructure requirements for sustainable densities), and that best delivers the requirements set out in Part D.

B Higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, in accordance with Policy D2 Infrastructure requirements for sustainable densities. Where these locations have existing areas of high-density buildings, expansion of the areas should be positively considered by Boroughs where appropriate. This could also include expanding Opportunity Area boundaries where appropriate.

C In other areas, incremental densification should be actively encouraged by Boroughs to achieve a change in densities in the most appropriate way. This should be interpreted in the context of Policy H2 Small sites.

2.2 The Design Code Assessment

2.2.1 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 and the actual uplift in Design Code parameters, **as we know of no other area designations or methodology for which the appropriate 'Area Type' data are defined or are available for assessment.**

2.2.2 The **Planning Inspector's** (October 2023) dismissal report for **Appeal A Ref: APP/L5240/W/22/3305791** and **Appeal B Ref: APP/L5240/W/22/3312168** at para15, indicates that the **Post Code** assessment is *"too prescriptive and not easily read on the ground"* and has therefore based the character assessment on the Council's and the appellant's description of the character of the area and the inspector's own observations at the site visit.



2.2.3 The **Council's character assessment** in the Case officer's report at:

- Para 3.2 *"The existing site is residential in character ..."*
- Para 3.3 *"In order to be acceptable the proposal would need to be of a suitable scale, form and design with limited impact on neighbouring amenity and preserve/enhance the character of the area ..."*
- Para 3.8 *"... Officers are concerned over the scale, bulk and massing of the proposed building. While the proposed development has a reduced footprint to the previously refused scheme the building still appears excessive in size and scale. ..."*
- Para 4.0 *"... The proposal would not respond effectively to the local character and would fail to succeed in positively enhancing wider area. ..."*

2.2.4 **The Appellant's Character Assessment – "Grounds of Appeal"**

- There is no mention of **"Character"** in the Appellant's **"Grounds of Appeal."**

2.2.5 **The Inspector's Character Assessment:**

- Para 14. *"...The character of the immediate environs of the site is formed by detached properties, mainly of two storey height but including two bungalows and a chalet bungalow. ..."*

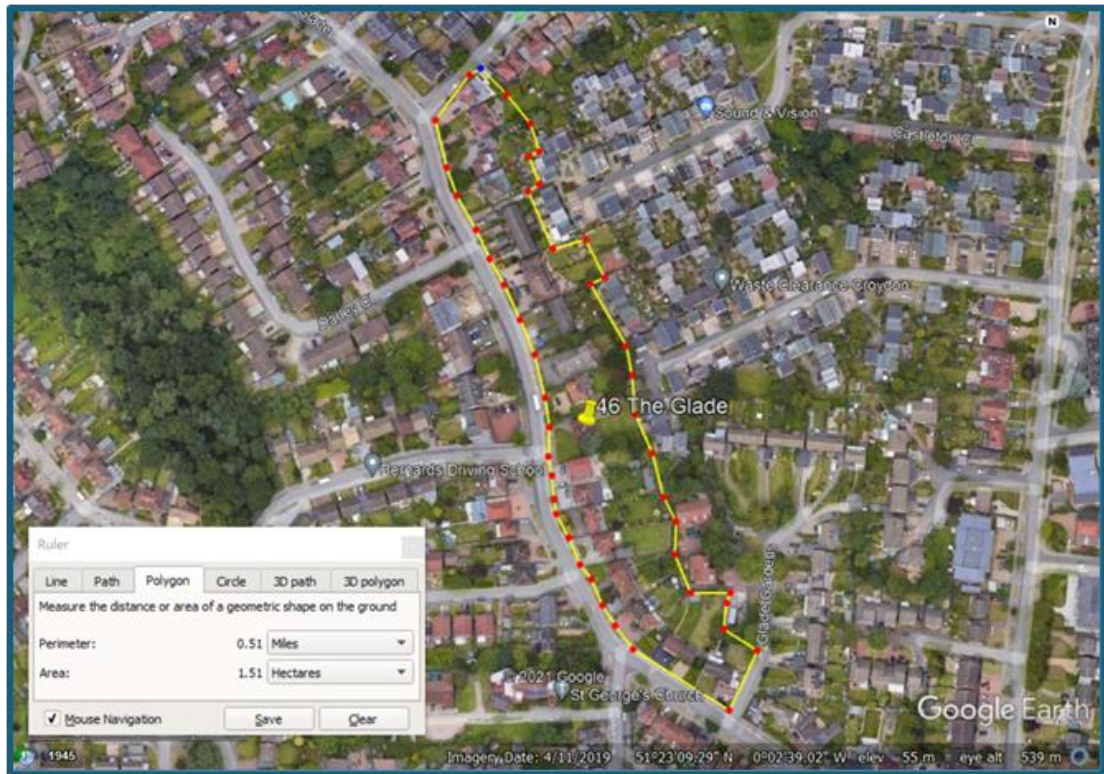
2.2.6 We are of the view that such **vague** and **subjective evaluations** are open to **prejudicial assessment** and are therefore extremely inappropriate when there is defined **National Policy Guidance** specifically required of the **National Planning Policies**. The **Inspectors** views would therefore seem to be in **contradiction and to have disregarded or is oblivious** of the requirement for **Area Type assessment**, as required by the most recent **National Planning Policy Guidance of the NPPF** (Sept 2023) para 129 and **NPPF** (December 2023) para 134.

2.2.7 **The elected government have set Policies which should be implemented by those employed to be responsible to implement those Policies; Otherwise, what is the point of an elected government defining those Policies?** It is called Democracy!

2.2.8 The **Post Code CR0 7QD** incorporating the proposed development site covers an area of **1.51ha** as measured approximately by **Google Earth** (see below). The **Valuation Office Agency** ³ (VOA) indicates the Post Code has **28 Dwellings** and the **Post Code Area Data** ⁴ indicates occupancy of **68 persons**, giving a **Local Design Code Housing Density** of 28/1.51 ≈ **18.54U/ha** and a **Residential Density** of 68/1.51 ≈ **45.03person/ha** which clearly places the local **Design Code** in an **"<Outer Suburban"** Area Type Setting.

³ <https://www.gov.uk/government/organisations/valuation-office-agency>

⁴ <https://www.postcodearea.co.uk/>



Google Earth Polygon measurement of Post Code CR0 7QD

2.2.9 Design Code Guidance as 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

2.2.10 Post Code Design Code parameters existing and resultant on the proposals.

Parameters of Post Code 'CR0 7QD' Design Code				
Area Design Code Parameter <small>(These parameters auto calc Design Code)</small>	Input Parameters			
	Existing CR0 7QD	Option 1 CR0 7QD	Option 2 CR0 7QD	
Post Code				
Area of Post Code (ha)	1.51	1.51	1.51	hectares
Area of Post Code (Sq.m)	15100	15100	15100	sq.m.
Number of Dwellings (Units) (*)	28	30	30	Units
Number of Occupants (Persons)	68	84	88	Persons
Occupancy	2.43	2.80	2.93	Person/dwelling
Post Code Housing Density	18.54	19.87	19.87	Units/ha
Post Code Residential Density	45.03	55.63	58.28	Bedspace/ha
Area Type (NMDC&G) U/ha	<Outer Suburban	<Outer Suburban	<Outer Suburban	Area Type
Area Type (NMDC&G) bs/ha	Outer Suburban	Outer Suburban	Outer Suburban	Area Type
(*) Last updated on 10 January 2024				
PTAL Required for Post Code (Actual Zero)	-0.06	0.21	0.28	PTAL
PTAL Available and forecast to 2031 (0 to 6)	0.00	0.00	0.00	PTAL

Post Code Design Code parameters existing and resultant on the proposals.

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2.2.11 **Application Proposal Design Code parameters.**

Difference Between Post Code (CR0 7QD) Design Code & Application Proposal						
	Existing	Option 1	Uplift	Option 2	Uplift	
Post Code Housing Density (Units/ha)	18.54	19.87	7.17%	19.87	7.17%	Units/ha
Application Housing Density (Units/ha)	9.80	39.22	300.20%	39.22	300.20%	Units/ha
Difference	-8.74	19.35		19.35		
Post Code Residential Density (bs/ha)	45.03	55.63	23.54%	58.28	29.42%	Bedspaces/ha
Application Residential Density (bs/ha)	39.22	196.08	399.95%	235.29	499.92%	Bedspaces/ha
Difference	-5.81	140.45		177.01		
PTAL available	0.00	0.00		0.00		
PTAL Required as a result of proposal	-0.20	3.79		4.78		

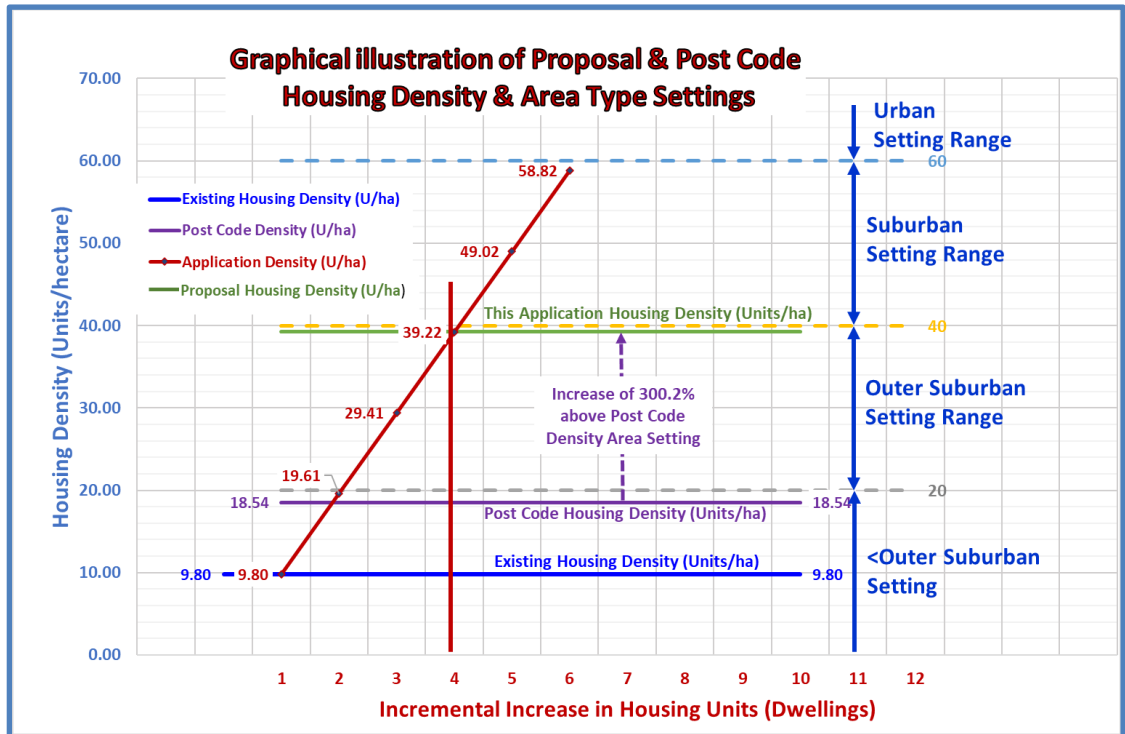
Application Design Code Details

2.2.12 **Comparison between the Post Code Design Codes and the Application Proposal Design Codes.**

Application Details						
Application Ref:	23/04740/FUL					
Address:	46 The Glade					
PostCode:	CR0 7QD					
Application Parameters						
	Existing	Option 1	Uplift	Option 2	Uplift	
Site Area (ha)	0.1020	0.1020	0.0%	0.1020	0.0%	ha
Site Area (sq.m.)	1020.00	1020.00	0.0%	1020.00	0.0%	sq.m.
Units (Dwellings)	1	4	300.0%	4	300.0%	Units
Bedrooms	2	10	400.0%	14	600.0%	Bedrooms
Bedspaces	4	20	400.0%	24	500.0%	Persons
Housing Density	9.80	39.22	300.2%	39.22	300.2%	Units/ha
Residential Density	39.22	196.08	399.9%	235.29	499.9%	bs/ha
Occupancy	4.00	5.00	25.0%	6.00	50.0%	bs/unit
Area Type Setting (Units/ha)	<Outer Suburban	Outer Suburban		Outer Suburban		Area Type Setting
Area Type Setting (Bedspaces/ha)	<Outer Suburban	Urban		Urban		Area Type Setting

Design Code Comparisons (Post Code & Application)

2.2.13 **Graphical illustration of Housing Densities**



Graphical Illustration of Housing Densities (Post Code and Proposal)

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- 2.2.14 As there is now **no** guidance to the relationship between the **Area Type, Housing Density, Residential Density** and **PTAL** due to the omission of the **London Plan Density Matrix**, an alternative assessment is necessary.
- 2.2.15 It is assumed that **Public Transport Accessibility** Range 0 to 6 should be proportionate to the local **Residential Density** over the full range of **Area Types** from **Outer Suburban** to **Central** as there is no other comparison available.
- 2.2.16 Thus, until **TfL** or the **Planning professionals** establish guidance on the assessment of **PTAL** by an alternative methodology, 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** and is considered to be a **linear** proportionate increase progression over the range.
- 2.2.17 The **National Unit** of occupation is **2.36 persons/Unit**,⁵ therefore, the **Area Type** in **National Housing Density** can be logically converted to an equivalent **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

- 2.2.18 Thus, 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**.
- 2.2.19 This simple analysis is the only logical method of assessment of the relationship between **PTAL** and **Residential Density** until the **Planning fraternity** or **TfL** define a replacement **Policy** for the omitted **Density Matrix**.
- 2.2.20 This methodology allows a simple assessment of **PTAL** by the simple function of:
- $$y = mx + c \text{ where } y = \text{Density}; \quad m = \frac{\delta y}{\delta x}; \quad x = \text{PTAL} \ \& \ c = y \text{ when } x = 0$$
- Over the **Residential Densities** range of **47.2p/ha** at **PTAL Zero** to **283.2p/ha** at **PTAL 6**.
- 2.2.21 Thus, at the available local **PTAL of Zero**, the appropriate **Residential Density** would be:

$$\text{Residential Density} = \left(\frac{283.2 - 47.2}{6 - 0} \right) * 0.00 + 47.2 = 39.33 * 0.00 + 47.2$$

47.2 persons/ha in an **Outer Suburban Area Type** setting.

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

2.2.22 The actual **Post Code** prior to the proposal has a **Residential Density** of **45.03persons/ha**. Therefore:

$$\text{Residential Density} = 45.03 = \left(\frac{283.2 - 47.2}{6} \right) * x + 47.2$$

$$\therefore x = \left(\frac{45.03 - 47.2}{39.33} \right) = -0.055 \text{ PTAL} \approx \text{PTAL } -0.06$$

2.2.23 **Option 1** proposal has a **Residential Density** of **196.08persons/ha**. Therefore:

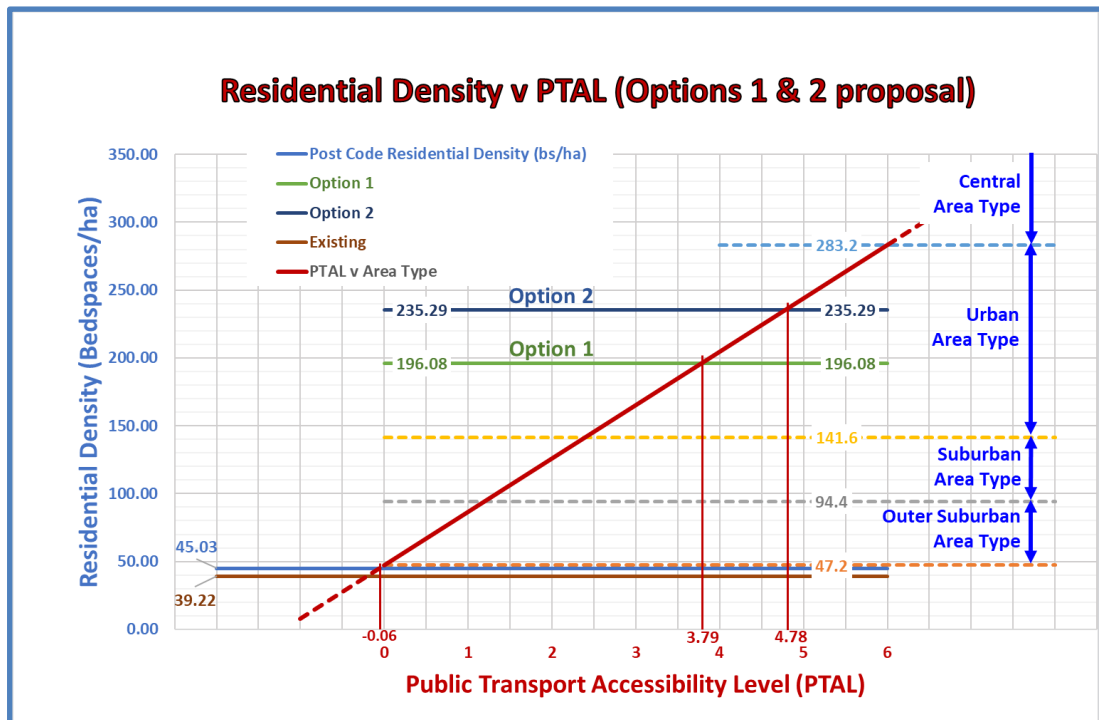
$$\text{Residential Density} = 196.08 = \left(\frac{283.2 - 47.2}{6} \right) * x + 47.2$$

$$\therefore x = \left(\frac{196.08 - 47.2}{39.33} \right) = 3.785 \text{ PTAL} \approx \text{PTAL } 3.79 \text{ (Option 1)}$$

2.2.24 **Option 2** proposal has a **Residential Density** of **235.29 persons/ha**. Therefore:

$$\text{Residential Density} = 235.29 = \left(\frac{283.2 - 47.2}{6} \right) * x + 47.2$$

$$\therefore x = \left(\frac{235.29 - 47.2}{39.33} \right) = 4.782 \approx \text{PTAL } 4.78 \text{ (Option 2)}$$



Graphical illustration of PTAL for Post Code and Proposal

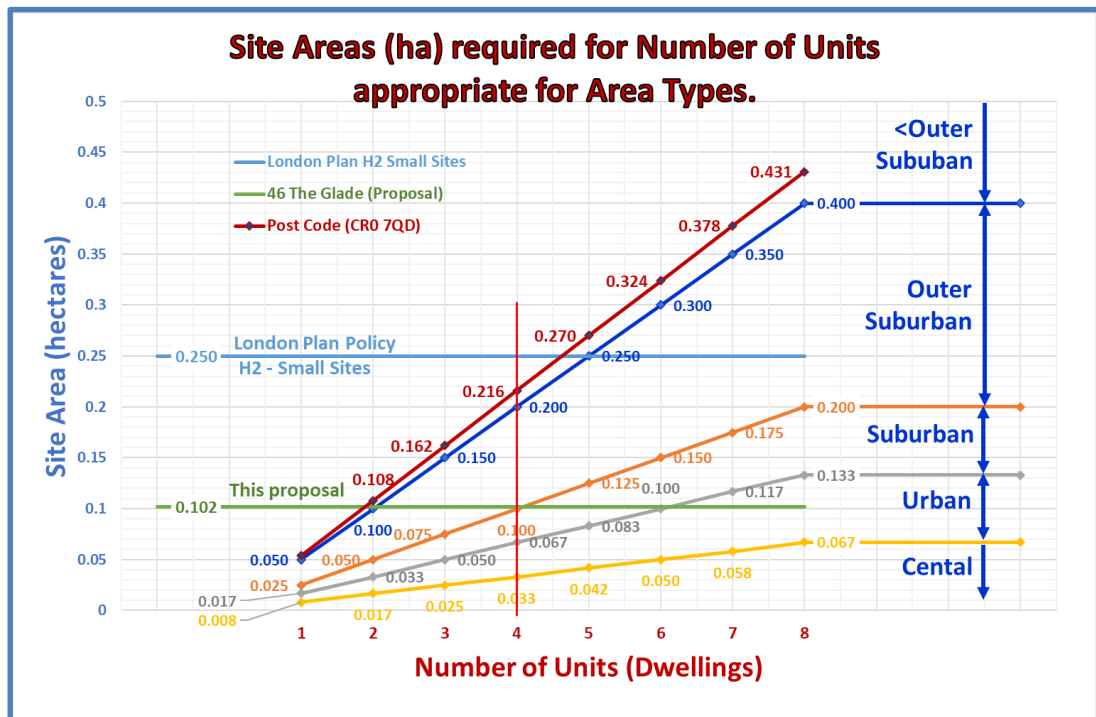
2.2.25 This analysis shows that the **uplift** in **Residential Density** for the proposal for either **Options 1** or **2** increases from an equivalent **Area Type** of **<Outer Suburban**, surpassing both **Outer Suburban** and **Suburban Area Type** and into an **Urban Area Type** setting without any increase in **supporting infrastructure**.

2.3 The **London Plan Policy D3** also requires proposals meet the **Site Capacity** as a **Design concept** which we interpret to mean the proposal should meet the **Site Capacity** for the local '**Area Type**' character of the locality and additionally, that all the requirements of the proposal can be accommodated within the available **Site Area boundaries** of the proposal.

2.3.1 **Site Area Capacity to remain within the Local Area Type setting.**

2.3.1.1 The minimum **Site Area** in hectares necessary to accommodate **4 dwellings** and remain within an **<Outer Suburban Setting Range** would be: **4/20 = ≥0.2hectares**; when the actual available site area is only **0.102ha**. i.e., the actual site area is **deficient by 0.098ha or 980sq.m.**

2.3.1.2 To be commensurate with the **Post Code Design Code** the site area would need to be **≥0.216ha**.



Graphical Illustration of Site Area Type required for the number of Dwellings.

2.3.1.3 Therefore, the proposal does **NOT** meet the required **<Outer Suburban Area Type Site Area** to remain within the **Area Type setting** of the **<Outer Suburban** locality thus failing to meet the requirement of **London Plan Policy D3**. **In addition**, as there is no planned increase in infrastructure over the life of the Plan to support the increased **Housing Density**, the proposal therefore fails to meet the **London Plan Policy D2 Infrastructure requirements for sustainable densities**.



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

2.3.2.1 A further measure of **Site Capacity** is assessed by analysis of the **capacity** of the site to **accommodate** the summation of all requirements of the proposal as defined by the Policies within the **Site boundary**.

2.3.2.2 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 **LPG** does indicate that alternative assessments can be made based upon the **concepts** of the **Design Guide Toolkit**. We have therefore prepared the following interactive spreadsheet to calculate the appropriate **Site Capacity** required for this proposal in the **Area Type** setting of **Post Code CR0 7QD**.

Indicative London Plan Policy D3 - Optimising Site Capacity & H2 - Small Site Capacity Calculator:														
Input Parameters App Ref: 23/04740/FUL 46 The Glade (CR0 7QD)														
Option 1: - First Floor 2 Bedrooms and an Office/study							Option 2: - First Floor 3 Bedrooms.							
Site Area (hectares)	Site Area (sq.m.)	Proposal 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.)
0.1020	1,020.00	328.60	10	12.5	12	14	18	1.71	1.25	1.23	0.90	0.53	0.53	0.43
Unit (Type)	Site Area (sq.m.)	Footprint or GEA	Option 1 Bedspaces	Option 2 Bedspaces	Option 1 GIA Required (Best Practice) (sq.m.)	Option 2 GIA Required (Best Practice) (sq.m.)	Otion 1 Amenity Space Require	Otion 2 Amenity Space Require	Option 1 Probable Children	Option 2 Probable Children	Refuse Bin Storage (Note 2)	Cycle Storage	Car Parking (London Plan)	
Unit 1	1,020.00	82.15	4	5	86	104	7.00	8.00	2	3	2.55	5.13	21.00	
Unit 2		82.15	6	7	120	134	9.00	10.00	4	5	2.55	6.84	21.00	
Unit 3		82.15	6	7	120	134	9.00	10.00	4	5	2.55	6.84	21.00	
Unit 4		82.15	4	5	86	104	7.00	8.00	2	3	2.55	5.13	21.00	
Totals	1020.00	328.6	20	24	412	476	32	36	12	16	10.20	23.94	84.00	
Proposal	Footprint or GEA	Amenity Space	Option 1 Play Space (included in Garden Area)	Option 2 Play Space (included in Garden Area)	Communal Amenity Space (Required)	Parking Spaces (sq.m.)	Cycling, Storage (sq.m.)	Refuse Bin Storage (Note 2)	Required Area (sq.m.) including GEA	Available Site Area (sq.m.)	Plot Area Ratio = GEA/Site Area	Floor Area Ratio (GIA/Site Area) (Best Practice)		
Option 1	328.60	20.00	120.00		0.00	84.00	23.94	10.20	586.74	1020.00	0.32	0.40		
Option 2	328.60	24.00		160.00	0.00	84.00	23.94	10.20	630.74	1020.00	0.32	0.40		
Assessment (Option 1)	Floor Area Ratio = (GEA/Site Area)	Plot Area Ratio = (GEA/Site Area)	% Site Garden Area (UGF)	Site Area available (sq.m.)	Garden Area (UGF) (sq.m.) (Note 1)	Required Area (sq.m.) including GEA	± Indicative Site Area (sq.m.)	% Site Capacity						
<Outer Suburban	0.25	0.125	100.0%	1020.00	900.00	586.74	-466.74	-45.76%						
Outer Suburban	0.375	0.25	75.0%	1020.00	645.00	586.74	-211.74	-20.76%						
Suburban	0.5	0.375	50.0%	1020.00	390.00	586.74	43.26	4.24%						
Urban	1	0.5	25.0%	1020.00	135.00	586.74	298.26	29.24%						
Central	2	1	0.0%	1020.00	-120.00	586.74	553.26	54.24%						
Assessment (Option 2)	Floor Area Ratio = (GEA/Site Area)	Plot Area Ratio = (GEA/Site Area)	% Site Garden Area (UGF)	Site Area available (sq.m.)	Garden Area (UGF) (sq.m.) (Note 1)	Required Area (sq.m.) including GEA	± Indicative Site Area (sq.m.)	% Site Capacity						
<Outer Suburban	0.25	0.125	100.0%	1020.00	900.00	630.74	-510.74	-50.07%						
Outer Suburban	0.375	0.25	75.0%	1020.00	645.00	630.74	-255.74	-25.07%						
Suburban	0.5	0.375	50.0%	1020.00	390.00	630.74	-0.74	-0.07%						
Urban	1	0.5	25.0%	1020.00	135.00	630.74	254.26	24.93%						
Central	2	1	0.0%	1020.00	-120.00	630.74	509.26	49.93%						

Note 1: Private Amenity Space and Play Space required is included in the overall requirement but deducted from the Garden Area (UGF) (if the Area Type has no Garden Area, this Private Amenity and Play Space should be included in the total GEA or the GIA of the individual Units).

Note 2: Refuse Bins capacities based upon Croydon Refuse Guidance Capacities required for the Type(s) of Dwellings with equivalent Dimensions for the minimum capacity of the total unit(s) required.

Site Capacity Interactive Spreadsheet evaluates the required Site Area.

- 2.3.2.3 The simple interactive spreadsheet (above) assesses the **Site Capacity** based upon the defined policies and requirements of the proposal.
- 2.3.2.4 The most significant parameter that differs across the **Area Types** is the **Average Amenity Space** (Garden Space) for the **Area Type Setting** which has a significant bearing on the **Area Type Settings**.
- 2.3.2.5 The resulting analysis shows that for **Option 1** to remain within the **Area Type** of the **Post Code** at **<Outer Suburban**, the **Site Area** is **deficient** by **≈466.74sq.m.** which decreases to **≈211.74sq.m.** for an **Outer Suburban Area type** and only goes **positive** for a **Suburban Area Type** setting.
- 2.3.2.6 For **Option 2** to remain within the **Area Type** of the **Post Code** at **<Outer Suburban**, the **Site Area** is **deficient** by **≈510.74sq.m.** which decreases to **≈255.74sq.m.** for an **Outer Suburban Area type** and to **≈0.74sq.m.** for a **Suburban Area Type** and only goes **positive** for an **Urban Area Type** setting.
- 2.3.2.7 In conclusion the proposal does **NOT** meet **London Plan Policy D3 Site Capacity** for both **Options 1 & 2** as the **Site Area Capacity** is inadequate to accommodate the requirements of the proposal and remain within the existing **Area Type setting**.

3 Growth - London Plan Policy H2 Small Sites

3.1 Croydon Plan Growth Policies

3.1.1 The Croydon Plan is now over 6 years out-of-date, and the Policies do not provide any guidance. The Policies for Intensification or densification are meaningless and could not be legally enforceable.

3.2 The London Plan Policy at para 4.2.4 states:

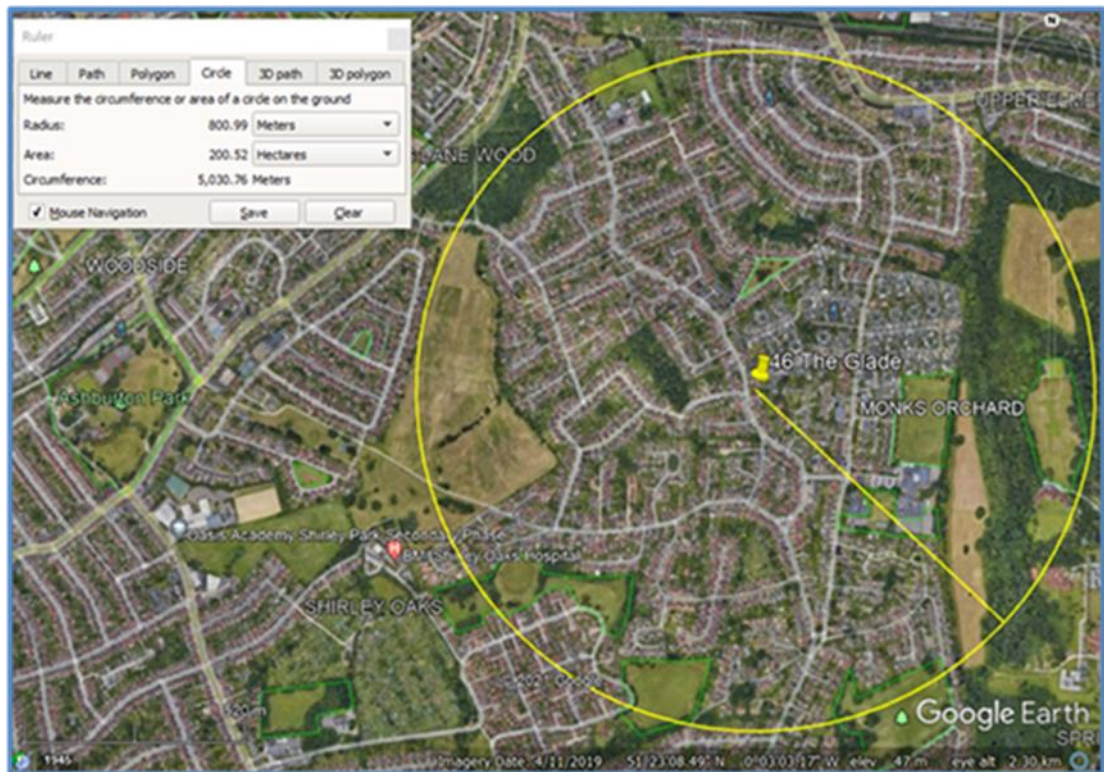
3.2.1 *“4.2.4 Incremental intensification of existing residential areas within PTALs 3-6 or within 800m distance of a station⁶ or town centre⁷ boundary ...”*

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

*“The small sites target represents a **small amount** of the potential for **intensification** in existing **residential areas**, particularly in **Outer London**, therefore, they should be treated as **minimums**. To proactively increase housing provision on small sites through ‘**incremental**’ development, Boroughs are encouraged to **prepare area-wide housing Design Codes**, in particular, for the following forms of development: **Residential Conversions, Redevelopments, extensions of houses and/or ancillary residential buildings.**”*

⁶ Tube, rail, DLR or tram station.

⁷ District, major, metropolitan and international town centres.



Google Image for 46 The Glade showing that it is over 800m from Tram/Train Station and District Centre;

3.2.3 **46 The Glade** has a **PTAL of Zero** and is greater than **800m** from a **Tram/Train Station** or **District Centre** and as such is inappropriate for **incremental intensification**.

3.2.4 If the case officer is minded to recommend approval, we request **detailed 'justification'** for allowing the proposed **'intensification'** in terms of **Housing and Residential Density** for this proposal at this **Setting** and **PTAL Zero** in contradiction to the **London Plan Policy H2** at para 4.2.4 and the **London Plan Policy D3** and **"Design Code"** and the **Department for Levelling Up, Housing and Communities "National Model Design Code and Guidance"**.

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

3.3.1 **London Plan Policy D2 - The density of development proposals should:**

- 1) consider, and be linked to, the provision of future planned levels of infrastructure rather than existing levels;
- 2) be proportionate to **the site's connectivity and accessibility** by walking, cycling, and public transport to jobs and services (including both **PTAL** and access to local services)

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

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for a better community**

time. This may mean that if the development is contingent on the provision of new infrastructure, including public transport services, it will be appropriate that the development is **phased accordingly**.

Para 3.2.4 **Minor developments** will typically have **incremental impacts** on local **infrastructure capacity**. The cumulative demands on infrastructure of minor development should be addressed in **boroughs' infrastructure delivery plans or programs**. Therefore, it will not **normally** be necessary for minor developments to undertake infrastructure assessments or for boroughs to refuse permission to these schemes on the grounds of infrastructure capacity.

3.3.2 As there is **no possibility** of **infrastructure improvement** ⁸ in the **Shirley North Ward** over the life of the Plan, it **“WILL”** be necessary for **minor developments to undertake infrastructure assessments** or for **LPAs to refuse permission on grounds of infrastructure capacity if cumulative demands have incremental impacts on local infrastructure capacity**.

4 Parking & Accessibility

4.1 Both the **Croydon Local Plan** and the **London Plan** recommend **1.5 spaces per dwelling for >3 Bedroom Units at PTALs Zero and Outer London Boroughs**. This equates to a recommended quota of **6 Parking Spaces** required where only **5 spaces** are provided. As the Glade is a Link Road between the A232 and the A222 it carries a heavy traffic load and is a BUS route and is only ≈7m wide, therefore, on-street parking should be avoided.

4.2 At **PTAL Zero** and with the absence of any appropriate mitigation for the increased reliance on private vehicles, the reduction of parking provision is considered unacceptable as on-street parking should be avoided as it is not possible to overtake a parked vehicle within the road width if there are oncoming vehicles.

5 Sustainability and Housing Need

5.1 **Sustainability - NPPF Para 7 States:**

5.1.1 *“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”

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

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

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>



5.2 Housing Need

5.2.1 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 over 20 yrs**. In relation to meeting housing “need” we raised a Freedom of Information (FOI) request **Ref: 4250621** on **31st January 2022**. The FOI Requested data on the “**Outturn**” of Developments since **2018** for the **Shirley “Place”** plus the **Area, Housing and Occupancy** of the **Shirley Place** for which the response is as follows:

5.2.2 The FOI response indicated, the **Shirley “Place”** as defined in the Local Plan has an area of **approximately ≈770 ha** (i.e., *The LPA has no idea of the actual Areas of the “Places” of Croydon*) and comprises **Shirley North and Shirley South Wards** and therefore the FOI response ‘suggests’ completions for **Shirley “Place”** can be calculated by **adding** the completion figures together for each **Shirley Ward**”.

(The statement of equivalence of the Sum of the Wards equals the Area of the “Place” is ‘NOT True.’)

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

5.2.4 The FOI Response indicates:

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

5.2.5 Analysis of the recorded data shows that over the ‘three’ full years **2018** to end of **2020**, the **Net Increase in Dwellings for Shirley = Shirley North Ward + Shirley 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**.

5.2.6 The **MORA Area of 178.20ha** (which we monitor) is only **24.92%** of **All Shirley (715.2ha)**, but at a rate of **36dpa** over the **20yr** period **≈720 dwellings**, would exceed the **Target for the Shirley “Place” of 278** by **442 Dwellings** i.e., for the **‘Whole’ of the Shirley “Place”**. This shows that **Housing need for Shirley North Ward has already been Met**.

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



5.2.7 The **Build Rate Delivery** of dwellings over **3 years** for all **Shirley** is averaging at **55 + 102 + 69 = 226 Ave ≈ 75.33/yr. dwellings per year**, so over **20** years the **Net Increase** will be **≈1507 dwellings**. (Exceeding the **278 Target** by **≈1,229**). The Target for the Shirley **“Place”** at **Croydon Plan Table 3.1** of the Revised **Croydon Local Plan** indicates a Target of **278 dwellings** over the period **2019 to 2039**. Over the Full Four Years the estimate outturn is **1257 dwellings** (see completions analysis table below).

5.2.8 This is $|278 - 1257.5|/278 = 979.5/278 = 3.5234 = 352.34%$ Increase for the **Shirley “Place” estimate** when the **MORA Area** is only $(770-178.2)/178.2 = 23.15%$ of the area of the estimated Shirley ‘Place’ and $(178.26-715.2/715.2) = 24.92%$ of all Shirley. *This is definitely NOT respecting the character of the locality when the locality of this proposal is “Inappropriate for Incremental Intensification” with a PTAL of Zero and there is no probability for increase in supporting infrastructure.*

Shirley North				
	2018	2019	2020	2021 (partial)
Gross units	48	94	73	16
Net units	45	87	69	12
Shirley South				
	2018	2019	2020	2021 (partial)
Gross units	12	17	3	5
Net units	10	15	0	5
Shirley Place				
	2018	2019	2020	2021 (partial)
Gross units	60	111	76	21
Net units	55	102	69	17

Results of Freedom of Information (FOI) request Ref: 4250621 31st Jan 2022.

5.2.9 This current rate (if retained) would exceed the Target over **20 yrs.** (of **278**) at **1257.5** by: **Percentage of Increase** of $|128 - 1257.5|/128 = 1129.5/128 = 8.8242 = 882.42%$. or a **Percentage Difference** of 128 and 1257.5 = $|128 - 1257.5|/((128 + 1257.5)/2) = 1129.5/692.75 = 162.91%$. **outturns** above the stated **Targets** is a **significant failure** to meet the **legally required objectives of Sustainability** as defined in the **NPPF Chapter 2. Achieving sustainable development**¹² as Shirley has no prospect of infrastructure improvement over the life of the Plan. The **Sustainability of Developments** is a **legal requirement**¹³ of development approvals.

5.2.10 This analysis clearly establishes that Housing need in the Shirley North Ward has already been met.

¹²

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

¹³ <https://www.legislation.gov.uk/ukpga/2004/5/section/39>



- 5.2.11 **All Development proposals should be judged on compliance to adopted Planning Policies and NOT on the basis of meeting Targets to support a Housing “need” especially so if that “need” has already been met, and there are NO infrastructure improvements to support the surpassing of that “Need.”**

6 Summary

- 6.1 This development proposal is an improvement on the previous proposals for this Site to reflect the Hipped Roof forms prevalent in the neighbourhood and thus relieving the 45 Degree Rule amenity to adjacent dwellings; in doing so this has reduced the two end of terraces to just two stories and thus reduced the residential density and occupancy ratio of the whole development.
- 6.2 However, the proposed development remains to be an over development for the Site **Area Type** of **<Outer Suburban** and would be more appropriate for an **Area Type Outer Suburban** for **Housing Density** and for an **Area Type Urban** for **Residential Density for both Options 1 & 2**.
- 6.3 The increases required would not be supported by the **existing infrastructure** which is currently adequate for **Area Type <Outer Suburban** as established by the assessment of the **Post Code CR0 7QD Area Type Design Code**, nor would the **Public Transport Accessibility** required to support the Residential Density of **2.79** be achieved as the **PTAL** for this locality is **Zero** and there is no prospect of improvement over the life of the Plan.
- 6.4 The minimum Internal Space Standards required of the London Plan Table 3.1 are not met in terms of **In-Built Storage**.
- 6.5 Consequently, the proposed development fails to meet the **Design Code** of the locality as defined by the **National Model Design Code & Guidance** and would result in a harmful effect on the character and appearance of the area. As such, in this respect, it would be contrary to the **NPPF Design Codes**, the **London Plan Policies on Design** and the **Croydon Plan Policies SP4 and DM10**. Together these Policies seek to achieve high quality design which **respects local character**.

7 The Planning Process

- 7.1 The forgoing submission is compiled on the grounds of **National and Local Planning Policies** and based upon **rational observations and evaluation**. There have been no **vague or subjective assessments** and therefore we respectfully request that all our foregoing analysis and evidence is a sound assessment and therefore extremely relevant to the final determination.
- 7.2 Local Residents have **“lost confidence in the Planning Process”** resultant on recent local **over-developments** and the lack of any additional supporting **infrastructure**, which, in the majority of cases, disregarded Planning Policies. Once that confidence is **lost**, it is extremely difficult to regain it.

- 7.3 Confidence and support of local residents is necessary to ensure the general requirement of housing **'need'** is supported and satisfied with the provision of appropriate sustainable developments. This can only be achieved by ensuring developments **fully comply** with the agreed **National and Local Planning Policies and Guidance**.
- 7.4 We urge the **LPA to refuse this application** and request the applicant to submit a revised proposal meeting the defined **National Model Design Code and Guidance** as published by the **Department for Levelling Up, Housing & Communities** (January & June 2021) **Build form Policies** for an **"<Outer Suburban" Area Type Setting**, supported by the **Regional** (London) and **Local** (Croydon) adopted and emerging **Local Plans**.
- 7.5 Please Register this representation as **Monks Orchard Residents' Association (Objects)** on the Public Access Register.

Kind regards

Derek



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Cc:

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

Shirley North Ward
Shirley North Ward
Shirley North Ward

Bcc:

MORA Executive Committee, Local affected Residents & Interested Parties