

Representation Form for the Croydon Local Plan Review 2019:

		Personal Details
1.	Representation Number:	MORA #001
2.	Title	Mr
	First Name	Derek
	Last Name	Ritson
	Profession	Retired – Former Communications Engineer I. Eng. M.I.E.T.
3.	Representative	Planning Adviser Executive Committee Member
4.	Organisation	Monks Orchard Residents' Association
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NPPF Plan Making

16. Plans should:

- a) be prepared with the objective of contributing to the achievement of **sustainable development**¹⁰;
- b) be prepared **positively**, in a way that is aspirational but **deliverable**;
- c) be shaped by early, proportionate and effective engagement between plan-makers and **communities**, local organisations, businesses, **infrastructure providers** and operators and statutory consultees;
- d) **contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals**;
- e) be accessible through the use of **digital tools** to **assist public involvement** and **policy presentation**; and
- f) serve a **clear purpose**, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).

Name or organisation: **Monks Orchard Residents' Association**

7. To which part of the Croydon Local Plan Review does this representation relate?

Croydon Local Plan Review:

CLP review - Issues and Options (Ch1 Intro & Strategic Options) - Shirley Place

Policy

SO1/SO2

Option

Option 1

Figure/Table

N/A

8. Do you think that the proposed policy or part of the plan meets the objectively assessed development and infrastructure requirements for Croydon (and the unmet needs of neighbouring authorities) as defined in **NPPF (2019) para 16**?

Yes

No

9. If No

Which sub paragraph of **NPPF Para 16** met.

Para a)

Not

Para b)

Not

Para c)

?

Para d)

Not

Para e)

Not

Para f)

Not

10. Do you think that the proposed policy or part of the plan enables the delivery of sustainable development in accordance with the policies of the National Planning Framework?

Yes

No

11. What other **NPPF** Paragraph does the Policy **NOT** Comply?

Para

122

Para

12. What other Policy of the **EMERGING LONDON PLAN** does the Policy **NOT** comply?

Policy

D1A

Prior to responding to SO1 & SO2 Questions – a clarification is required of the actual London Plan Target for the Whole of Croydon:

The CLP review - Issues and Options (Ch1 Intro & Strategic Options) states:

Borough totals 2019 - 2039	At least 46,040 new homes across the borough	At least 46,040 new homes across the borough
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But the London Plan (EiP) Inspectors Report (8th October 2019) Recommendation Summary States:

- "Reduce the ten-year small site housing targets for boroughs to give a total of 119,250 dwellings (rather than 245,730) and as a consequence reduce the overall housing targets for boroughs to give a total of 522,850 dwellings (rather than 649,350).
- Delete the Mayor's further suggested change policy H2A small housing developments.
- Add to reasoned justification to policy H2 to clarify that borough small site targets can be taken to amount to a reliable source of windfall sites."

Croydon Revised Inspector's Recommendation	20,790 Ten Year Supply 41,580 by 2039	2079 per year
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This recommended reduction should result in a lower requirement for Croydon (from the 46,040 dwellings stated to 41,580 by 2039) and thus should this reflect a reduction in the figures stated for the Shirley Place Options 1, 2 & 3? (Approx. 9.688 % decrease)

Details:

Shirley Place Option 1:

Summary of housing numbers for each Strategic Spatial Options 2019 – 2039 dwellings

	Strategic Spatial Option 1	Revised Option 1 Approx. 9.688% Reduction
Shirley Dwellings	360 to 460	≈325 to ≈415

Comment

1. It is noted that throughout these Review documents, the emphasis is on Housing quantities rather than people, it is the population that requires infrastructure and services (NOT Houses) and therefore the main controlling parameter should be Residential Density measured in bed spaces per hectare NOT Housing Density measured in Units per hectare.

SO1 What are the strengths of Option1?

1. Option 1 exceeds Housing Targets with High Density Housing developments with high population densities (bed spaces per hectare).
2. Sustainable growth of the suburbs is essential in delivering the housing growth we need and will need to be delivered across the 16 Places of Croydon. The necessary physical, social, cultural and economic infrastructure to mitigate the impact of growth will need to be delivered to enable the development of a vibrant and successful borough.

3. Sustainable growth is only possible if the proposed developments to meet housing need is supported by the appropriate timely provision of infrastructure across the 16 places of Croydon e.g. the public transport infrastructure, a road network to support the traffic generated and appropriate public services infrastructure e.g. GP Practices, Health Service provision and school places etc related to the local Residential Density.

SO2 What are the weaknesses of Option 1?

1. It is acknowledged (in SO1 above) that in order to provided sustainable growth of the suburbs it is essential to ensure the necessary physical, social, cultural and economic infrastructure is provided to mitigate the impact of growth will need to be delivered to enable the development of a vibrant and successful borough. BUT there is no proposed Policy to actually define the acceptable infrastructure required to support the proposed developments as required by London Plan Policy D1A.
2. No planned Policy of increase of “annual” supporting Infrastructure related to the increase in Residential Densities and Housing Densities over the period of the Plan 2019 – 2039.
3. The A232 & A222 (Shirley Wards) regular peak time congestion cannot cope with the level of traffic now so any increase in population will increase the possibility of peak time grid-lock as a result of additional housing and residential densities and increased population with increased car ownership within the locality.
4. No planned Policy improvement of Road capacity to cope with increased road traffic resultant on increased population – whether car usage or public transport capacity.
5. Tram extension along A232 & A222 will reduce road capacity for other vehicles, as it would be sharing road capacity with other road users and any tram route crossing will result in additional junctions which will again result in increased congestion.
6. Disruption to traffic carrying capacity along A232 & A222 if Tram link construction during peak traffic hours.
7. **If the agreed Policies are not enforced to ensure development proposals are within the requirements of supporting infrastructure ^[1] – then the whole strategy of Development Management of increased housing will fail spectacularly.**
8. **Croydon Local Plan at para 6.37 states: “The Croydon Local Plan provides policy on urban design, local character and public realm. However, in line with the National Planning Policy Framework, *there is a need to provide detailed guidance on scale, density massing, height, landscape, layout, materials and access. This will provide greater clarity for applicants.*” But the Croydon Local Plan provides NO SUCH GUIDANCE.**
9. **DM10.1 state:**
 - a. *“Proposals should be of high quality and, whilst seeking to achieve a minimum height of 3 storeys, should respect:*
 - b. *The development pattern, layout and siting;*
 - c. *The **scale, height, massing, and density**;*
 - d. *The appearance, existing materials and built and natural features of the surrounding area; the Place of Croydon in which it is located.”*But again, it provides **NO SUCH GUIDANCE ON SCALE, MASSING or DENSITY.**
10. **DM10.11 provides Four designations of intensification growth but again does NOT specify the appropriate **Housing or Residential Densities** appropriate for each of these **four designations in relation to available or planned infrastructure** of the locality - which is surely a defined function of **Development Management – to ensure infrastructure supports development proposals.****
11. **The NPPF para 16 defines Plan Making Requirements and Para 122 defines a requirement for achieving appropriate densities.**
12. The proposal does **NOT** meet the emerging London Plan **Policy D1A** on managing Densities in relation to required **“Local Characterisation Studies”** to enable the

[1] <http://www.mo-ra.co/planning/planning-complaints/>

- appropriate **Housing and Residential Densities** for the available and planned public transport accessibility to support these levels of local development proposals.
13. Unsustainable **High Residential & Housing Densities** (no planning parameters to measure or limit Densities) and no relationship to **Public Transport Accessibility** appropriate for the locality (does **NOT** meet requirement of **NPPF para 122**).
 14. **Most of Shirley Residential area is PTAL at 1 and forecast to remain at PTAL 1 (1a or 1b) until 2031.**
 15. **Local Characterisation Studies** should consider the appropriate Residential **Densities** of Localities based upon the **bed spaces or occupants per hectare** ^[2] for which the existing and forecast local **Public Services** can cope including **Public Transport Accessibility (PTAL)**.
 16. No stated “**Characterisation Study**” of the “**Shirley Place**” to include availability of current or planned future Public Services provision to support the increased population as a result of increased number of dwellings to meet the “**Place**” requirements as defined in the new **London Plan Policy D1A** - Infrastructure requirements for sustainable densities.
 17. The proposed **SO2 Option 1** would require a yearly increase of approximately **18 to 22 dwellings per year** over the period **2019 to 2039**.
 18. Most of these would be Blocks of Flats (of up to 9 dwellings per block) dwellings for sale or rent but never owned by occupants as leasehold (Not Freehold) purchases.
 19. At end of Lease the ownership returns to the developer unless the Lease is re-purchased by the occupant.
 20. High maintenance charges to purchasers or renters.
 21. Undefined **Communal Open Space** Policy as building often crammed into unsuitable available site areas. No specified allocation per resident/occupant of Communal Open Space.
 22. Croydon Local Plan Para 6.72 states:
 - a. *“Policies DM10.4 and DM10.5 apply to all new residential developments and conversions. Croydon’s local character is the leading consideration on the quantum of private and **communal open space** to be provided for developments. When **calculating** the amount of private and communal open space to be provided the following elements should be excluded:”*
 - b. Footpaths;
 - c. Driveways;
 - d. Front gardens;
 - e. Vehicle circulation areas;
 - f. Parking areas;
 - g. Cycle parking areas; and
 - h. Refuse areas.But does NOT provide **any guidance** on the **actual quantity** of “**Communal Open Space**” to be afforded to residents of a development of multiple occupation (in **square metres or hectares/person**).
 23. With the high-level requirement of Housing with resultant loss of garden and natural vegetation space, a specified area of “**Communal Open Space**” should be defined to assist meeting climate change targets and for the appropriate accommodation standards (in hectares/population as a similar measure to CLP1 Policy RO12).
 24. Concreting over large areas and reducing gardens, trees and vegetation creates more likelihood of local flooding and reduces biodiversity which is a major contributor to climate change. Loss of trees exacerbate local susceptibility to local flooding as trees absorb and dissipate significant local precipitation from the soil and subsoil.
 25. No account is taken of the effects of increased development in the Shirley Area on the Chaffinch Brook water course and its effects on surface water flooding.

[2] [hatc_housing_space_standards_report_for_gla_2006.pdf](#)

26. Loss of garden areas and trees which contribute to CO2 absorption and provide clean air as a result of demolition of single and semi-detached dwellings and replacement with Blocks of Flats and minimal communal open green space.
27. Intensification Areas should reflect the London Plan definition and Policy on Intensification. ^[3]
28. Planned provision of commensurate Health Services e.g. GP Practices to cope with increase population.
29. Inadequate planned local school places within appropriate distances to reduce journey lengths on public transport or by car.
30. Overspill car parking from such increased population in residential streets as inadequate parking provision for number of dwellings or number of occupants which reduces available road capacity (width reduction).
31. Overspill car parking from such increased population causes increased congestion and traffic hold-ups due to narrowness of road network from overspill on-street parking only allows one direction of travel vehicle movements due to restricted road width from parked vehicles.
32. Increased requirement for Open Spaces for healthy living for the population, dog walking areas and jogging away from polluting traffic congestion.
33. Loss of small suburban family homes of detached houses and bungalows with gardens which provides biodiversity and vegetation to combat climate change.
34. Loss of suitable suburban single storey accommodation for elderly due to loss of bungalows with associated gardens which provide exercise and activities for elderly.
35. Loss of suitable suburban “downsizing” accommodation for elderly – understood that demographic changes indicate higher proportion of elderly as life span increases.

[3] London plan Policy H2A Small housing developments:
Policy 4.2A.1 Incremental intensification of existing residential areas within PTALs 3-6 or within 800m distance of a station⁴¹.