

Representation Form for the Croydon Local Plan Review 2019:

		Personal Details
1.	Representation Number:	MORA #003
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 (MORA)
4.	Organisation	Monks Orchard Residents' Association (MORA)
5.	Address Line 1	██████████
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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)

Policy

SO5 -SO7

Option

Option 3

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 para 16 does the policy **NOT meet NPPF Para 16**.

Para a)

No

Para b)

No

Para c)

?

Para d)

No

Para e)

No

Para f)

No

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

16

Para

122

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

Chapter

Policy

D1A

OPTION 3

SO5. What are the strengths of Option 3?

SO6. What are the weaknesses of Option 3?

SO7. If Green Belt were to be released for development, should the focus be on finding the locations with the best access to services and infrastructure, or the locations that cause the least harm to Green Belt and those that can be developed most sustainably?

Prior to responding to SO5, SO6 & SO7 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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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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Does this recommended reduction result in a lower requirement for Croydon (from the 46,040 dwellings stated) and thus should this reflect a reduction in the figures stated for the Shirley Place Options 1, 2 & 3?

Details:

Shirley Place Option 3:

Summary of housing numbers for each Strategic Spatial Options 2019 – 2039 (20 yrs) dwellings

	Strategic Spatial Option 3	Revised Option 1 Approx. 9.688% Reduced	As Option 2 but Loss of Green Spaces
Shirley Dwellings	360 to 450	≈325 to ≈406	Loss of Green Spaces

SO5 What are the strengths of Option 3?

- **Same as Option 2**

SO6 What are the weaknesses of Option 3?

- Same as Option 2

SO7 If Green Belt were to be released for development, should the focus be on finding locations with the best access to services and infrastructure, or the lest harm to Green Belt and those that can be developed most sustainably?

1. Same as Option 2 but loss of local Green Spaces – undefined but unacceptable.
2. With increase in Residential Density the need to retain Open Green Spaces increases.
3. There is NO guidance for the amount of Open Green Space appropriate for the number Residential Density (population) of an area in terms of population per hectare of Open Green Space. This needs to be defined.
4. Compliant to Draft London Plan Chapter 8 Green Infrastructure and Natural Environment.
 - a. Policy G1 Green infrastructure
 - A London's network of green and open spaces, and green features in the built environment should be protected and enhanced. Green infrastructure should be planned, designed and managed in an integrated way to achieve multiple benefits.
 - B Boroughs should prepare green infrastructure strategies that identify opportunities for cross-borough collaboration, ensure green infrastructure is optimised and consider green infrastructure in an integrated way as part of a network consistent with Part A.
 - C Development Plans and area-based strategies should use evidence, including green infrastructure strategies, to:
 - 1) identify key green infrastructure assets, their function and their potential function
 - 2) identify opportunities for addressing environmental and social challenges through strategic green infrastructure interventions.
 - CA Development proposals should incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network
5. The rest of Option 2 applies:
6. No planned increase of "annual" supporting Infrastructure for such high increase in Housing and Residential Densities over the period of the Plan 2019 – 2039.
7. The A232 & A222 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 increase car ownership within the locality.
8. No improvement to Road capacity to cope with increased road traffic resultant on increased population – whether car usage or public transport capacity.
9. 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.
10. Disruption to traffic carrying capacity along A232 & A222 if Tram link construction during peak traffic hours.
11. **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.**
12. **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.**

13. **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.**
14. Most of Shirley Residential area is **PTAL at 1a** and forecast to remain at **PTAL 1a** until **2031.**
15. The proposal does **NOT** meet the emerging London Plan **Policy D1A** on managing Densities in relation to required **Local Characterisation Studies** to enable the appropriate **Housing and Residential Densities** for the available and planned public transport accessibility to support this level of local development proposals.
16. 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**).
17. **Local Characterisation Studies** should consider the appropriate **Densities** of Localities based upon the **bed spaces or occupants per hectare** for which the existing and forecast local **Public Services** can cope including **Public Transport Accessibility (PTAL).**
18. 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.
19. The proposed **SO2 Option 1** would require a yearly increase of approximately **18 to 22 dwellings per year** over the period **2019 to 2039**
20. Most of these would be Blocks of Flats dwellings for sale or rent but never owned by occupants as leasehold (Not Freehold) purchases.
21. At end of Lease the ownership returns to the developer unless the Lease is re-purchased by the occupant.
22. High maintenance charges to purchasers or renters.
23. Undefined **Communal Open Space** Policy as building often crammed into unsuitable available site areas. No specified allocation per resident/occupant of Communal Open Space.
24. 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**).
25. 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.

26. 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.
27. No account taken of the effects of increased development in the Shirley Area on the Chaffinch Brook water course and its effects on surface water flooding.
28. 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 space.
29. Intensification Areas should reflect the London Plan definition and Policy on Intensification.
30. Planned provision of commensurate Health Services e.g. GP Practices to cope with increase population.
31. Inadequate planned local school places within appropriate distances to reduce journey lengths on public transport or by car.
32. 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).
33. 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.
34. Increased requirement for Open Spaces for healthy living for the population, dog walking areas and jogging away from polluting traffic congestion.
35. Loss of small family homes of detached houses and bungalows with gardens which provides biodiversity and vegetation to combat climate change.
36. Loss of suitable single storey accommodation for elderly due to loss of bungalows with associated gardens which provide exercise and activities for elderly.
37. Loss of suitable "downsizing" accommodation for elderly – understood that demographic changes indicate higher proportion of elderly as life span increasing.