

Representation Form for the Croydon Local Plan Review 2019:

		Personal Details
1.	Representation Number:	MORA #004
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 (MORA)
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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

SO8 to SO13

Option

All

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)

Para b)

Para c)

Para d)

Para e)

Para f)

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

No

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

Chapter

Policy

D1A

ALL OPTIONS

SO8. What infrastructure needs to be provided to support each option?

SO9. Which option provides the greatest potential to improve conditions/facilities for existing communities, and why?

SO10. Which option provides the most environmentally sustainable growth, and why?

SO11. Which option will help address the causes of climate change most effectively, and why?

SO12. Which option best helps to address some of the borough's existing environmental challenges, and why?

OTHER OPTIONS

SO13. If you think that none of the strategic options would deliver 46,040 homes in a sustainable manner, what other options are there for meeting Croydon's housing need?

SO8 What Infrastructure needs to be provided to support each Option:

The required Infrastructure can be listed as:

- a) Access to Public Transport - Public Transport Accessibility (PTAL)
- b) Access to Communal open Space (for occupants of Flats & HMO's)
- c) Access to Public Amenity Open Space (hectares/population)
- d) Access to Public Services (GP Practices, Health Care Facilities & Hospital access)
- e) Access to Schools (Primary & Senior)
- f) Access to Sports Facilities and Gymnasiums etc.

These requirements should have a recommended figure for each based upon the Residential Density (measured by bed-spaces per hectare) of any proposed development related to the Locality and Population who will require access to the services provided by that infrastructure.

It is the population that requires Public available Infrastructure – **NOT** the number of dwellings. The dwellings need the physical infrastructure (Water, Sewage, Electricity etc) but the people need the Public Services Infrastructure (Transport, Schools, GP & Medical Services etc). The provision of these Public Services should be a function of the population density and demographic density of the locality which is defined by the Residential Density of an area in people per hectare (Bed-Spaces per hectare).

It is the Planners' Responsibility to define the Accessibility Factor for each of these required Public Infrastructure Facilities as each would be different in their requirements to satisfy the numbers of local occupants (Residential Density) likely to require access to those Services and facilities within a suitable distance or frequency for the local population.

The preferred recommendation is to relate each parameter to the local Residential Density as a factor per hectare as it is the **local population** which require the services provided by the infrastructure and the occupants of the locality and Residential Density within the area defines the requirement of the infrastructure.

- a) Public Transport Accessibility is already defined as PTAL for a 100m Grid by the TfL WebCAT throughout all London Boroughs and this should limit the Residential Density to specific ranges of PTAL for particular Localities (*Characterisation Studies*) settings and sub settings (*local characterisation study results, Suburban, Urban etc*) before the PTAL is required to be increased to cope with the additional population (i.e. Residential

Density in terms of number of occupants per hectare at specific PTAL's). If the local Residential Density reaches this limiting figure either future development should be curtailed or additional services be provided.

- b) Access to Communal Open Space should be allocated as the Number of Occupants of a block of Flats or HMO's per hectare (*e.g. rate of 1 hectares/per 1000 Occupants or 10m² per Occupant*) or a similar factor requirement. A specific factor should be established such that Applicants are aware of what Communal Open Space needs to be provided to be acceptable to the occupants of Flats or HMO's and the local community as defined in **NPPF para 16 d**).
- c) Access to Healthcare should be provided on the recognised availability of GP Services per 1000 population at a given distance (Walking/Wheelchair Distance) from the location of the service provider. There should already be a recommended factor defined by Healthcare Providers which has been established over historical experience and this should be fed into the Planning Policies for each locality. What is the recommended GP provision per 1000 population? Healthcare providers should have a recommended figure and this should be used for the policies. If the local Residential Density reaches this limiting figure either future development should be curtailed or additional services be provided.
- d) Similarly, school places should be commensurate with the local Residential Density based upon a relationship between Demographics of family population housed (Census Figures for number of school age children, the age profile for the locality. When a new dwelling is proposed, the capacity (bed-spaces per hectare) residential density should be limited to the capacity of local school places and if the capacity is reaching its maximum either provide additional school places or limit the increase in development – to curtail further increase in Residential Density.
- e) Access to Open Space for recreation and health should be related to the population density per hectare within an acceptable distance from the population of the locality which needs to use that open space. Increasing Residential Densities without commensurate increase in Open Spaces creates overbearing and claustrophobic localities with poor air quality or inadequate sunlight for healthy living standards for the population of the locality.
- f) Again, Access to Sport Facilities should be related to the age profile of the locality and the number of population (Residential Density) within the locality likely to use the facility.

There could be modifying factors for any of the above criteria based upon local environmental requirements – such as local surface water or flooding factor and infiltration of subsoil or air pollution policies to mitigate against any overriding environmental requirement. A tolerance figure \pm % or similar could be defined such that when reaching this figure, further policy should be put in place to improve the accessibility or minimise further development until the access to the appropriate infrastructure service has been accommodated. Surely all these parameters should be available from experience and it is the fundamental responsibility of the Planning Profession to have developed these parameters over time. If not, what are the actual defined responsibilities of the profession?

Currently, there is no input to a planning application which considers the acceptability or otherwise of any of these required parameters. The only criteria currently considered is by vague subjective assessment which, due to its vagueness and subjectivity cannot be enforced as there is no defined criteria to assess acceptability or unacceptability and therefore cannot be a determining factor. The only criteria currently adopted is

whether a proposal meets housing targets irrespective of whether the supporting infrastructure is available or planned or other policies are appropriate.

When every other profession is becoming more precise and mechanistic and specific in their approach to defining requirements, Croydon Planning Officers adopt subjective and vague definitions to proscribe policies which in reality have no criteria to define acceptability or otherwise of Planning Requirements. This is a devastating situation for the Planning Profession in the 21st Century with all the available sophisticated mapping and computing tools and computable data to define the parameters to extremely defined specific limits. The Planning Profession is going backwards, not forwards in its methodologies and terminology.

SO9 Which Option provides the greatest potential to improve conditions / facilities for existing communities, and why?

If the parameters for specifying the access Infrastructure and Services are defined mechanistically with regard to Residential Densities (bed-spaces per hectare) and characterisation studies set out in our response to Question SO8, these would apply across ALL OPTIONS irrespective. The input data would follow the same criteria for any option and would automatically define the required infrastructure for the appropriate options at those stated in relation to Residential Densities.

This is a modern mechanistic defined approach to specify acceptability or unacceptability of a proposal based upon known parameters and criteria rather than the vague subjective inappropriate method currently adopted. Once a formula is defined it only requires the appropriate parameters to be inputted and the answer is defined automatically – this saves all the bother of arguing and debate – or contesting by complaints. It also allows applicants a greater understanding of what would be considered an acceptable proposal – which would result in more efficient use of Development Management resources.

SO10 Which Option provides the MOST environmentally Sustainable growth, and why?

Returning to the fundamental concept as stated in Response to Question SO8, it is appropriate to feed into the parameters setting the factors for Infrastructure provision relating to the Residential Densities and there should be consideration of any environmental factors built in to the criteria.

SO11 Which Option will help address the cause of climate change most effectively, and why?

SO12 Which Option best helps to address some of the Borough's existing environmental challenges, and why?

If the parameters defined in response to Question SO8 should have additional factors to mitigate against climate change then the approach would automatically vary the analysis to take these issues into account. The main parameters to mitigate against climate change is the loss of trees and vegetation and the calculated increase in CO₂ emissions as a result of the loss of vegetation and the reduction in water absorption which the loss of vegetation would result. Factors to consider would be the measured losses by number of and quality of trees and vegetation by area, age or tree type and maturity and measured air quality components. These are measurable quantities that

have been ascertained from experience by the various appropriate organisations and universities.

Other application requirements to mitigate against climate change would be the Carbon Footprint targets of the proposed development and the specific requirements of the building technology of the proposed development:

1. Boiler efficiency rating
2. Water usage targets
3. Heat Losses to external windows, walls and doors
4. Window double/triple glazing
5. Building Insulation requirements
6. Solar Power or other natural power supply capabilities
7. Electric Car Charging Points
8. Other Refuse and recycling facilities

Most of these requirements are contained and are regularly updated in the UK Building Regulations.

Other Options:

SO13 If you think that none of the Strategic Options would deliver 46,040 homes in a sustainable manner, what other options are there for meeting Croydon’s Housing need.

1. Ensure all brownfield sites are built on first.
2. Ensure that all approved applications building programs are started on time and at least within a year of approval.
3. Prevent (by financial incentives) construction companies holding large land banks for longer than a specified period prior to gaining planning permission.
4. Negotiate a lower 10-year target with the Mayor of London as Croydon has higher targets compared with the Area of other Outer London Boroughs and the Population of the Croydon Borough compared to other Outer London Boroughs e.g.

Table 4.1 Ten Year Target for House Completions

Authority	Targets		LA Area		Population		Council Tax
	Ten Year Target	Annual Average	Area (km ²)	Area (ha)	2016	Area per person	Band D
Bromley	14,240	1,424	150.2	15,020.0	329,400	0.0456 ha/person	£1,452.71
Croydon	29,490	2,949	87.0	8,700.0	382,300	0.0228 ha/person	£1,636.96
Difference	15,250	1,525	-63.2	-6,320.0	52,900	-0.0228	£184.25
% increase	107.10%	107.10%	-42.08%		16.06%		

- Define all these requirements as Policies to be met in the revised Local Plan with actual limits which can be recognised as acceptable or unacceptable.
- Meet requirements of Draft London Plan Chapter 8.
- Once a Policy has been agreed and defined – they should be **enforced** by Development Management (**otherwise why bother to review the Local Plan**).