

## Representation Form for the Croydon Local Plan Review 2019:

		Personal Details
1.	Representation Number:	MORA #005
2.	Title	Mr
	First Name	Derek
	Last Name	Ritson
	Profession	Retired – Formerly 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**<sup>10</sup>;
- 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 (Ch2 Themes)**

Policy

**ECC1 To ECC 5**

Options

**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**.

Par 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

Para

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

Chapter

Policy

ECC1. Thinking about the environment and climate change in Croydon, what's the most important thing to you?

ECC2. What can we do to support our communities to be greener and more sustainable?

ECC3. Have we missed anything important about the environment and climate change?

ECC4. How can new developments support a reduction in surface water flooding?

ECC5. Are there any other policy options that we should be focussing on? Please explain your answer.

**ECC1 Thinking about the environment and climate change in Croydon, what's the most important thing to you?**

- We assess that the local traffic congestion during peak travel times is the worst contributor to climate change locally. Increased localised population is contributing to this traffic congestion as there is no commensurate improvement to traffic carrying capacity linked to the increase in population.
- The new environmentally friendly vehicles have insufficient supporting infrastructure for recharging (electric vehicles) or other possible future propellants (e.g. hydrogen) etc to support the future possible changes in propulsion technologies.
- The Croydon Tram system occupies a significant proportion of existing road capacity and sharing road space with other forms of transport rather than a totally separate means of public transport provision. The option of higher-level means of movement of people would have been preferred such that it could bypass the current congested road network and junctions by an "above road level" transportation system (raised monorail system or equivalent). Provision of a Tram extension would similarly require mainly shared road space and junctions with existing vehicles on existing highways which would not ultimately reduce congestion but increase congestion proportionately with the increase in population.

**ECC2 What can we do to support our communities to be greener and more sustainable?**

- Provide incentives for conversion to more efficient, less polluting, heating systems;

- Provide incentives for installing solar panel heating systems;
- Provide incentives for replacement of double-glazed windows with triple glaze residential windows;
- Provide incentives to use public transport instead of private cars, by improving comfort by more seating capacity, by improving frequency of service and cleanliness and by more appropriate fare structures;
- Provide incentives for installing home draft exclusion systems;
- Increase building regulations for more efficient insulation;
- Plant more Street Trees;
- Retain all current open spaces and plant more trees on those open spaces;
- Provide more access to non-polluting vehicle charging and fuel supplies;
- Improve recycling collections;
- As incentive for change - reduce Council Tax for homes which install environmentally friendly systems etc.

### **ECC3 Have we missed anything important about the environment or climate change?**

It would be helpful to have targets for:

- Tree Planting per year across the Borough;
- An allocation of Open Space per number of local residents;
- Further provision of Vehicle Charging Points;
- Incentives for reduction of Carbon Footprints of existing properties.
- Woodland Land Owners can just chop down and clear areas of designated woodland as long as it is within the '5 Cubic metre' License threshold set by the forestry commission.
  - Over a period of time, this 5 Cubic metre cumulatively results in the decimation of the woodland such that the criteria for the designation of "Nature Conservation" is demolished and the designation subsequently challenged by the land owner, which then allows development proposals on the previously site of "Nature Conservation Importance" to be NOT so important and the designated land become available for development.
  - The Croydon Local Plan at DM27 - Protecting and enhancing our biodiversity, does not provide any protection in such situations and correspondence with the Planning Department has confirmed such a situation.
  - Modify Policy DM27 to prevent demolition of trees on sites of "Nature Conversation Importance" to retain the category and prevent regular felling of trees in order to retain the sites designation.

### **ECC4 How can Developments support a reduction in Surface Water Flooding?**

- Ensure Development Proposals are NOT sunk below the existing ground level to reflect a suitable height of surrounding properties. Many recent developments have required removal of significant amounts of top-soil in order the reduce the overall height of a development, when surrounding properties are bungalows or bungalows with accommodation in the roof space. Some have been sunk between 0.5 to 1 metre below the natural Ground Level. This contributes to local surface water flooding in areas where SuDS Systems are not appropriate due to London Clay subsoil.
- Sustainable Drainage Systems (SuDS) require good infiltration and some subsoils do not provide permeability of ground water e.g. London Clay. These

subsoils are NOT suitable for SuDS Systems. A local mapping of localities with unsuitable subsoils should be undertaken to identify localities in the Borough which are unsuitable for SuDS Infiltration Systems. These areas should be identified on the Policies Map.

- Identification of the local watercourses – such as the Chaffinch Brook on the policies Map to identify where developments require additional surface water protections e.g. higher damp proof courses with foundations and footings of engineering bricks impervious to water. Provision of temporary Air Brick seals, provision of external Door water seals in areas subject to high surface water flooding especially where level access is required for wheelchair accessibility.

#### **ECC5 Are there any other Policy Options that we should be focusing on?**

- Reduce the ultra-fine particulates in local air pollution by limiting the congestion or reducing diesel vehicles on local roads.
- Define these requirements in specific detail (measurable factors) as Policies to be met in the revised Local Plan.
- Once a Policy has been agreed and defined – they should be **enforced** by Development Management (**otherwise why bother to review the Local Plan**).