Representation Form for the Croydon Local Plan Review 2019:

		Personal Details
1.	**Representation Number:**	**MORA #008**
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**
5.	Address Line 1	███████
	Address Line 2	██████████████████
	Address Line 3	█████
	Postcode	██████
6.	Email Address	planning@mo-ra.co

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**

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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 **CP1 to CP10**   Option **All**   Figure/Table **N/A**

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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 ☑

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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) ☑

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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 ☑

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

Para ☐   Para ☐

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

Chapter ☐   Policy ☐

CP1. Thinking about parking, what's the most important thing to you?

- Modern day life requires convenient mobility to travel from home to destinations in a timely comfortable, clean warm environment and in order for this to be possible suitable parking is required at home premises and at the destinations.
- If one has to spend an inordinate time searching for a suitable parking space at the destination, this places undue stress to passengers to meet their objective in a timely manner.
- If businesses require customers to attend their premises, adequate and sensibly priced parking needs to be available, otherwise the business will fail as customers will find alternative cheaper parking at other competing business venues;
- The high parking charges at business locations is a disincentive to use those businesses and services.
- Provide out of town cheaper parking for "park and ride" services into town.

CP2. Do you have any thoughts on new development proposals being car free or permit free?

- It is NOT acceptable or legally possible to prevent car ownership in a modern society as the need for car ownership is not constant across society; some residents depend on the convenience of car ownership for their employment, business activity or mobility if they are disabled;
- Car Free Development proposals limit the future occupants for the life of the development to being car free and this may become unacceptable during the ownership of the dwelling, forcing an unnecessary move to a property with car parking facilities.
- Hospital and Health Services Car Parking should be Free for "Blue Badge" holders irrespective of the number of disabled bay provisions.

CP3. What is preventing people from using alternatives to the private car?

- Alternatives to private car ownership is:
  - Rental for specific travel requirements
  - Requirement to carry goods and equipment for business activities
  - Convenience.
  - Mobility difficulties

CP4. What are your ideas for how Croydon could make more use of car clubs, particularly in the suburbs?

- Car Clubs require availability at short notice;
- Pick-up and drop-offs need to be at convenient locations;

- Affordability;
- Regular Maintenance and cleaning of vehicle to ensure health and safety.

CP5. Are there any other measures which could be rolled out?
- Cycle shared rental access systems with pick-up and destination lockable locations for the fit and able.

CP6. Would you make any changes to the council's current car parking policies, to make them more effective?
- Reduce Parking charges to attract residents to Croydon's Shopping Areas as we are definitely losing out to The Glades in Bromley. Our family now only shop in Bromley as Croydon's shopping centre has deteriorated significantly and parking charges are excessive.
- To attract shoppers back to Croydon will require significant incentives as once it becomes acceptable to shop elsewhere it will be difficult to change peoples' views and habits on the benefits of other local shopping localities.

CP7. Do you have any ideas how the Local Plan review can address the parking needs of new development proposals?
- Increase the on-site off-street parking for suburban developments in order to reduce on-street parking which causes congestion and accidents;
- Reduce on-street parking which causes congestion for other road users.
- Ensure that the parking bays are configured to allow entrance in a forward gear and have adequate space to be able to exit and change to a forward gear to exit from the area in a safe and controlled manoeuvre. All parking provision should allow a clear turning head to allow exit in a forward gear.

CP8. Should Croydon produce parking standards that are different to those set out in the London Plan? Please explain why?
- Yes;
- The London Plan focusses on Inner London Borough's which have higher accessibility to Public Transport including Underground & Overground Rail provision which outer London Boroughs do not have such high Accessibility (especially South London Boroughs);
- Our Residential Locality within Shirley has majority public transport accessibility at PTAL of 1 (1a & 1b) and is forecast to remain at PTAL 1 until 2031 and therefore private car ownership is prevalent and will continue to be so.

CP9. Should the council set a minimum level of parking in areas with very limited accessibility to public transport, and why?
- There is no legislation preventing car ownership and residential areas with very low Public Transport Accessibility will likely own more than one car or multiple cars for family use and if there is limited on-site parking, they will park in the nearest road causing local traffic congestion.
- The fact that there is no allocated off-street parking does NOT deter ownership of a vehicle. Any vehicle will just be parked at the nearest convenient roadside.
- Preferable to provide off-street parking to prevent traffic congestion which causes increased pollution and delays.

CP10. Are there any other policy options that we should be focussing on? Please explain your answer.
- Parking at Hospitals and Healthcare providers should be free for disabled drivers or disabled passenger(s) (Blue Badge Holders) in all bays.

- Parking at Hospitals and Healthcare providers should be free for all patients and visitors with a valid exemption notice supplied by the Hospital Administration Staff by application. This is to avoid free parking or any parking for other drivers NOT using the hospital facilities or have adequate reason for hospital parking but would park for convenience for other purposes.
- Once a Policy has been agreed and defined – they should be **enforced** by Development Management (**otherwise why bother to review the Local Plan**).