

Representation Form for the Croydon Local Plan Review 2019:

		Personal Details
1.	Representation Number:	MORA #009
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 (Ch2 Themes)

Policy

H1 to H10

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

Para

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

Chapter

Policy

H1. Thinking about housing, what's the most important thing to you and why?	H6. What is preventing more community-led housing (where groups of residents build their own affordable homes) being built in Croydon?
H2. Croydon has to increase the amount of housing it currently provides. Do you have any ideas how we can achieve this?	H7. How can the Local Plan support the delivery of high-density family homes across the borough, and meet the need for this type of housing?
H3. If you live in a property that is bigger than you need, what would make moving to a new development with smaller properties attractive to you?	H8. How can the Local Plan review support purpose built private rental schemes in Croydon?
H4. What is preventing more self-build homes (where you design your home) being built in Croydon?	H9. Are there any other types of home that the Local Plan review should be supporting that will help to meet housing need in Croydon?
H5. What is preventing more custom-build homes (where a developer provides a shell but the purchaser specifies the layout and fit out of the home) being built in Croydon?	H10. Are there any other policy options that we should be focussing on? Please explain your answer.

H1 Thinking about housing, what's the most important thing to you and why?

- The most important issue is that all new development proposals should respect the locality of the area destined in terms of Residential Density as measured in bed-spaces per hectare for which **ALL** supporting infrastructure can cope.
- It is imperative that future occupants of a proposed development can assimilate smoothly into the new accommodation and be accepted in the locality by existing residents. For this to happen the proposed development must be acceptable to local residents for future goodwill to the future residents.
- Currently there are NO policies (which are being observed) which reflect the interests of existing residents to ensure acceptability of new developments.
- New Developments should recognise that the future occupants need living space and storage space to allow current and future residents the freedom to live without being cramped and restricted in their own homes.
- The local existing and planned infrastructure should support the development proposals and should be considered for each proposed development.
- Any Community Infrastructure Levy (CIL) levied on a developer should be spent within the locality of a development proposal.

H2 Croydon has to increase the amount of housing it currently provides. Do you have any ideas how we can achieve this?

- To carry existing residents to accept increased housing and increase in population you should ensure enforcement of all current adopted and emerging Policies!
- Currently, Development Management and the Planning Committee treat policies as "advisable" and less important than whether the proposal provides additional housing irrespective of whether the proposal meets accommodation standards for the future occupants or whether the proposal is acceptable for the character of the locality to which it is destined.
- Ensure new developments respect the local character;
- Ensure new developments have the appropriate supporting infrastructure and public services;
- Ensure that existing Open Green Spaces are retained and expanded to accommodate the increase in population. Define the Area appropriate in hectares for the population of the area (Open Spaces hectares/Number of occupants) for the locality.

H3 If you live in a property that is bigger than you need, what would make moving to a new development with smaller properties attractive to you?

- It is not financially economically reasonable to downsize;
- Stamp Duty too high;
- Agent fees too high;
- Removal costs too high;
- Moving is too stressful;

- A smaller property would be attractive if it has adequate amenity space and green space with off-road parking in a quiet street.
- H4** What is preventing more self-build homes (where you design your own home) being built in Croydon?
- Availability of land for self-build;
 - High price of land;
 - High risk of completion;
 - Financial mechanisms to fund land purchase, building costs and fittings whilst still living in a property (mortgaged or rented);
 - Competition with developers who have more money and resources taking all available land and buying out family homes.
- H5** What is preventing more custom-built homes (where a developer provides a shell but the purchaser specifies the layout and fit out of the home) being built in Croydon?
- Public knowledge of the possibility;
 - Finance availability;
 - Cost of rental accommodation or existing mortgage during the build interim period;
- H6** What is preventing more community-led housing (where groups of residents build their own affordable homes) being built in Croydon?
- Organisation of community groups;
 - Cost of renting while funding cost of building;
 - Competition from developers who are taking all available land and buying out family homes.
 - Balance of professions necessary to undertake self-build (Plumbers, bricklayers, carpenters and other professions. Also, logistics and project planning to ensure the sequence of building program is appropriate.
 - Planning Committee have alienated the local community by not taking into account local policy and allowing over-development proposal approvals.
- H7** How can the Local Plan support the delivery of high-density family homes across the Borough, and meet the need for this type of housing?
- High Density is a misnomer – what is “high” Density – how high is high?
 - The Residential Density of a development MUST be limited to acceptable standards for living accommodation – referring to “high” density alone has no meaning.
 - The Residential Density as measured by bed-spaces per hectare MUST be supported by the available or planned infrastructure requirements;
 - The Housing Density MUST be supported by acceptable physical services available to the locality: Drainage, Sewage, Water supply (pressure) Electricity supply, Gas Supplies (pressure), Road Access and for modern day Broadband Access.
 - The Local Plan should define these requirements and any tolerances within which the development would be acceptable or unacceptable.
- H8** How can the Local Plan review support purpose-built private rental schemes in Croydon?
- The Local Plan should define the acceptability parameters and criteria and the unacceptable parameters and criteria for all types of appropriate build according to the local character in which it is destined;
 - The Private Rented schemes build should meet all adopted planning policies.
- H9** Are there any other types of homes that the Local Plan review should be supporting that will help to meet housing need in Croydon?
- Single-level smaller homes for the elderly who wish to downsize.
 - Semi-detached family homes with garden amenity space.
- H10** Are there any other policy options that we should be focussing on?

- Define the amount of “Communal Open Space” appropriate for Flats and HMO’s in terms of Hectares/occupant.
- Provide more electrical charging points for electric-powered cars.
- Once a Policy has been agreed and defined – they should be **enforced** by Development Management (**otherwise why bother to review the Local Plan**).