

Representation Form for the Croydon Local Plan Review 2019:

		Personal Details
1.	Representation Number:	MORA #010
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

AH1 to AH10

Option

All

Figure/Table

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

Help us to create policy which supports the delivery of affordable housing in Croydon

- AH1. Tell us any ideas you have for increasing the number of high quality affordable homes in the borough.
- AH2. What types of affordable housing are most needed?
- AH3. How can the council make sure there are enough affordable homes for people with disabilities or long-term health conditions?
- AH4. Should the council set minimum affordable housing percentages that apply to every housing site, and why?
- AH5. Do you think developers of smaller sites (under 10 homes) should make a financial contribution towards affordable housing, and why?
- AH6. Should all affordable rented homes be provided at London Affordable Rents (which are lower level of rents), even if this reduces the number of affordable homes delivered?
- AH7. Are there any other policy options that we should be focussing on? Please explain your answer.

The following questions are aimed at the planning and development sector. However, any interested person is welcome to answer them:

- AH8. Should viability assessments be undertaken at the plan-making stage to inform affordable housing requirements, rather than at application stage, in line with national planning policy and why?
- AH9. Is the current requirement for an affordable housing mix of 60% affordable/social rent and 40% shared ownership/intermediate housing appropriate or should it be changed in line with the new London Plan?
- AH10. Would adoption of the London Plan threshold approach to viability help deliver more affordable homes?

- AH1. Tell us any ideas you have for increasing the number of high-quality affordable homes in the Borough?
 - What is the definition of “High-Quality”?
 - What is the definition of “affordability”?
 - Using brownfield sites effectively to provide more affordable housing.
 - Brownfield sites could be used for both business developments and housing developments if the proposals were carefully managed and integrated.
 - Housing developments above retail outlets and above business premises.
 - Provide family homes as well as flatted schemes with adequate amenity space.
 - Provide social housing within all these schemes.
- AH2. What types of affordable housing are most needed?
 - Define requirements of “affordability”
 - Mixtures of flatted schemes with adequate space standards and family homes with social housing;
 - It is also important to provide homes for elderly people to downsize and increase availability of family homes – single-level housing.
- AH3. How can the council make sure there are enough affordable homes for people with disabilities or long-term health conditions?
 - Provide more single-level homes,
 - Restrict re-development of bungalows to retain single level accommodation for elderly;
 - If necessary, provide Multiple level accommodation with dual lifts (to avoid isolation if one lift fails);
 - Provide single level housing close to health providers;
 - Provide more GP surgeries.
- AH4. Should the council set minimum affordable housing percentages that apply to every housing site and why?
 - Yes, the council should set targets for affordable housing and also social housing because that will help with the housing situation.

AH5. Do you think that developers of smaller sites (under 10 homes) should make a financial contribution toward affordable Housing and why?

- I think developers of smaller sites should also have a target to provide a percentage of social housing.
- Financial contributions are not going to help when more and more developers only build homes that are not contributing to the pool of social housing.
- Where would financial contributions be spent to help provide more affordable housing or would this funding just contribute to the Local Council budget (contributions should be ring fenced).

AH6. Should all affordable rented homes be provided at London Affordable Rents (which are lower level of rents) even if this reduces the number of affordable homes delivered?

- Don't know.

AH7. Are there any other policy options that we should be focussing on?

- Providing more social housing, ensuring a wide mix of homes (single-level, family homes & flatted schemes) and increasing the local infrastructure in order to cope with the increase in housing.
- Increase or keep green spaces in order to provide somewhere for children to play and enrich the local environment.
- Once a Policy has been agreed and defined – they should be **enforced** by Development Management (**otherwise why bother to review the Local Plan**).

AH8 – AH10

- Don't know.