

Representation Form for the Croydon Local Plan Review 2019:

		Personal Details
1.	Representation Number:	MORA #011
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

E1 to E8

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 economy in Croydon

- E1. What can be done to encourage residents to work in Croydon rather than commute out of the borough?
- E2. How can we encourage and support youth talent?
- E3. Do you have any ideas for how more businesses can operate in our existing industrial estates?
- E4. How can the council encourage more creative industries to come to Croydon?
- E5. How can we create and encourage affordable workspaces in the borough?
- E6. How do we support our independent businesses to survive as competition for land increases?
- E7. How might new homes be developed alongside industrial uses and still be spaces that work for both residents and businesses?
- E8. Are there any other policy options that we should be focussing on? Please explain your answer.

- E1 What can be done to encourage residents to work in Croydon rather than commute out of the Borough?
 - Reduce Business Rates to attract more businesses into Croydon to open up more opportunities for local residents to gain local employment.
 - Reduce Car parking charges to attract more shoppers to Croydon Retail areas which are in competition with Bromley and other shopper areas.
 - Significantly Improve and increase Broadband access and speed in the Croydon business area.
 - Use Business exhibitions to promote business opportunities in Croydon
- E2 How can we encourage and support youth talent?
 - Provide local schools and colleges with business presentations on available vocations, vocational studies for students not aiming for University places;
 - Provide local schools and colleges with visits to local businesses for work experience;
- E3 Do you have any ideas for how more businesses can operate in our existing industrial Estates?
 - Provide modular business properties which allows appropriately-sized business accommodation to be available for new businesses and accommodate growth without moving.
 - Provide business accommodation which can be reconfigured and adapted to the type of businesses being undertaken to allow managed growth.
 - Provide High Speed Broadband Access connections for new businesses without delay.
 - Better, faster transport links to existing industrial estates. Encourage better traffic flow during rush hour – open up more roads to through traffic. Prevent cars parking on-street.

- E4 How can the Council encourage more creative industries to come to Croydon?
- Provide Grants and funding for Business Opportunity Exhibitions in Croydon to attract new and existing businesses to locate and relocate to Croydon.
 - Provide creative environments for industry using unique architecture and innovative ideas.
 - Faster broadband networks for creative hubs.
 - Better transport links to these areas.
- E5 How can we create and encourage affordable workspace in the borough?
- Reduce Business Rates and parking charges.
- E6 How do we support our independent businesses to survive as competition for land increases?
- Use existing Brownfield sites for new businesses;
 - 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 business premises.
 - Make Croydon economically a more attractive location to start and run all types of businesses.
- E7 How might new homes be developed alongside industrial uses and still be spaces that work for both residential and businesses?
- New homes close to or adjacent to local businesses should ensure any environmental disturbances (noise or air pollution) resultant on the business operation is limited to agreed acceptable levels.
 - New homes within specific distances from Business operations should be provided with enhanced insulation from disturbances of any business operation.
 - Specify appropriate acceptable and unacceptable noise and vibration levels at defined distances from the sources within which Residential accommodation would be acceptable and unacceptable.
 - Specify appropriate acceptable and unacceptable air pollution levels at defined distances from the source within which Residential accommodation would be acceptable.
 - Specify any other parameters and criteria which should be adopted to ensure effects on any Residential accommodation should be avoided or which would be considered inappropriate.
- E8 Are there any other policy options that we should be focussing on?
- Generally, define policies which will attract businesses into the Croydon Area which are economically and environmentally positive for the residents of Croydon.
 - Define the specific parameters and tolerances of acceptability.
 - Once a Policy has been agreed and defined – they should be **enforced** by Development Management (**otherwise why bother to review the Local Plan**).