

Representation Form for the Croydon Local Plan Review 2019:

		Personal Details
1.	Representation Number:	MORA #014
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

UD1 to UD3

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

Help us to create policy which supports Croydon's unique character through high quality design.

UD1. Where do you think high density developments (including tower blocks and other models of high density) should be located other than Central Croydon?

UD2. How can we improve public spaces to support a range community activities across the borough?

UD3. Are there any other policy options that we should be focussing on? Please explain your answer.

UD1 Where do you think high density developments (including tower blocks and other models of high density) should be located other than Central Croydon?

- Initially define “**High**” **Density** as otherwise has no meaning.
- The **Residential Density** requires adequate supporting infrastructure to support the level of increase in population for the immediate locality.
- The **Residential Density** needs to meet the requirement of the **London Plan Policy D1A Infrastructure requirements for sustainable densities.**
- The **Residential & Housing Density** needs to meet the requirements of **NPPF Policy 122 – Achieving Appropriate Densities.**
- **Residential Densities** should be measured in **bed-spaces/hectare** not Habitable Rooms per hectare as Open Plan Accommodation invalidates the parameter “habitable Rooms per hectare”.
- High Density Tower Blocks should only be provided at locations of **PTAL 5 to 6** as defined by **TfL WebCAT** as the high **Residential Density** of Tower Blocks require access to **high level of Public Transport Accessibility** and Blocks of Flats have extreme limitations of car parking facilities.

UD2 How can we improve public spaces to support a range (of) community activities across the Borough?

- Define a minimal acceptable area of “*Communal Open Space*” for the occupants of Flats and HMOs in terms of Square Metres or hectares per occupant of developments;
- Certain designated Open Green Spaces should be provided with sporting activities marked out (e.g. Football pitches, Tennis Courts, Bowling Greens, Running Courses etc);
- Set up Clubs for various activities – use Ward Budget allocations to assist various activities;

UD3 Are there any other policy options that we should be focussing on?

- Rebalance Community facilities across Wards which have deficiency of community facilities. Currently those with good or reasonable facilities are provided with additional facilities (e.g. New Addington has significant and new facilities when other Wards have virtually none).
- Once a Policy has been agreed and defined – they should be **enforced** by Development Management (**otherwise why bother to review the Local Plan**).

