

Representation Form for the Croydon Local Plan Review 2019:

		Personal Details
1.	Representation Number:	MORA #017
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**

7. To which part of the Croydon Local Plan Review does this representation relate?

Croydon Local Plan Review:

CLP review – Chapter 3 - Shirley Place

Policy

SO1

Option

Option 1

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

Strategic option 1 – Shirley Place

All residential growth to take place in the existing urban area.

Homes already under construction

18

Number of homes in Shirley in 20 years (the proposed Place target)

360 to 460

Description of the option

There will be less change in Shirley across all strategic options, beyond a small area of focussed intensification around Shirley Local Centre. In the area of focussed intensification around Shirley Local Centre there will be a gradual change in character to denser forms of development. About a third of development will be on windfall sites.

Opportunities, constraints and change up to 2039

- An area of sustainable growth of the suburbs, growth will mainly be of infilling with new homes that respect existing residential character and development on specific allocated sites.
 - Sustainable growth means that the available or planned infrastructure can support the growth – but currently there is no means of ensuring that the Policies ensure this occurs. More detailed **localised “Characterisation Studies”** are needed.
- Some small-scale employment will be provided in the Local Centre with predominantly independent shops supporting the local community.
- New development will be sensitive to the existing residential character and the wooded hillsides of the Place referring to the Borough Character Appraisal to inform design quality. Public realm improvements will focus on the Local Centre. Any building and conversions should be of a high standard of design to ensure the character of the Centre is respected.
 - What Policy definitions can ensure **“new developments are sensitive to the existing residential character”** as DM10 does not include any **specific criteria** to determine whether a proposal meets this requirement, can DM10 be modified to define exactly what requires **“new developments to be sensitive to the existing residential character”** as without a definition, this statement is meaningless and could not substantiate a refusal if a case officer considered that a proposal did not meet this requirement.
- Development in the flood zones will be guided by the policies of the Local Plan to reduce flood risk.
 - Significant areas of Shirley have subsoil of London Clay which is impervious to rainwater and is unsuitable for Suds Infiltration Systems. Could the Policies Map overlay subsoil types which are suitable for Suds Systems and those areas that are NOT suitable for Suds Systems?
 - Limit the loss of trees in areas subject to surface water flooding as trees absorb and dissipate significant volumes of water.

- Shirley will continue to be well served by open space with improved connections to the Green Grid, along with way finding, enabling increased walking and cycling.
 - With increase in local population, ALL existing green spaces should be retained. The allocation of Green Spaces per 1000 population should be defined such that the proportion per person living in the locality does not get reduced with the increase in population.
- With improved access and links where possible, the existing connectivity and good public transport of Shirley will be maintained.
 - The Public Transport Accessibility for Shirley Residents Monks Orchard & Shirley Oaks is Low 1a or 1b with only areas near the A232 at PTALS 2 or 3 at best. Long Term, with increased Residential Densities will require improvements of the Lower PTALS.
- The council will work on the feasibility of a rapid transit route/tram extension from Central Croydon to West Wickham/Hayes in discussion with Transport for London, to improve connectivity, air quality and housing growth.
 - The provision of Tramlink extension along the A232 will be sharing road space with other traffic and thus reduce the traffic carrying capacity from current levels.

WebCAT

Address or co-ordinates
 Shirley, Croydon, UK

Access level (PTAL) | Time mapping (TIM)

PTAL: a measure which rates locations by distance from frequent public transport services.

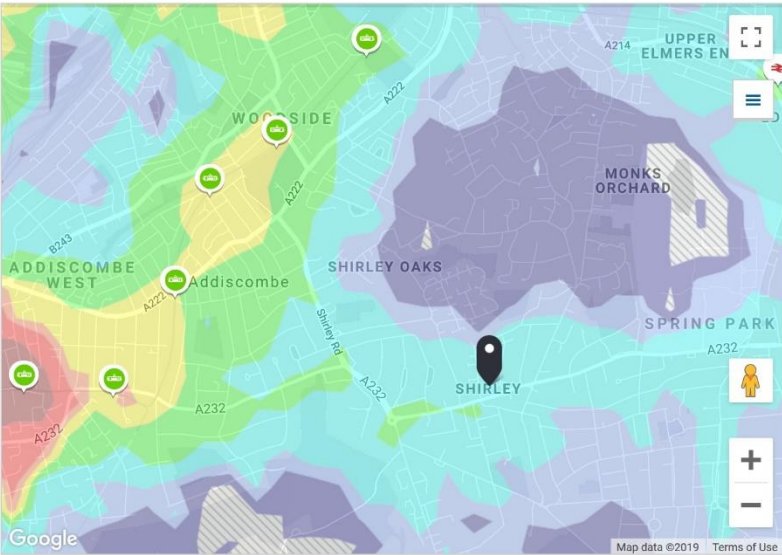
Map key - PTAL

0 (Worst)	1a
1b	2
3	4
5	6a
6b (Best)	

Map layers
 PTAL (cell size: 100m)

Scenario
 2031 (Forecast)

Highlight locations where PTALs have changed from Base Year



You can click anywhere on the map to change the selected location.

PTAL output for 2031 (Forecast)
 2

Shirley
 Shirley, Croydon CR0, UK

MORA Comment:

- Shirley is designated as Suburban ^[1] – NOT Urban; ^[2]

[1] In the United Kingdom and in Ireland, suburb merely refers to a residential area outside the city centre, regardless of administrative boundaries. Suburbs, in this sense, can range from areas that seem more like residential areas of a city proper to areas separated by open (rural) countryside from the city centre.

[2] An urban area is the region surrounding a city. Most inhabitants of urban areas have non-agricultural jobs. Urban areas are very developed, meaning there is a high density of human structures such as houses, commercial buildings, roads, bridges, and railways.

- Shirley has a couple of **Urban** Shopping parades but the rest of Shirley is **Suburban**.
- **Focussed Intensification** area designation of Shirley has no **“Characterisation Study”** to determine the appropriate **Residential or Housing Densities**;
- The **Residential** areas of Shirley has had no **“Characterisation Study”** to determine appropriate **Densities** for the various localities, types of architecture and character of the **“Shirley Place”**;
- The homes already under construction at **18** does **NOT** seem correct. (When did this period of analysis start and over what period?)

Prior to responding to SO1 & SO2 Questions – a clarification is required of the actual London Plan Target for the Whole of Croydon:

The CLP review - Issues and Options (Ch1 Intro & Strategic Options) states:

Borough totals 2019 - 2039	At least 46,040 new homes across the borough	At least 46,040 new homes across the borough
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But the London Plan (EiP) Inspectors Report (8th October 2019) Recommendation Summary States:

- *"Reduce the ten-year small site housing targets for boroughs to give a total of 119,250 dwellings (rather than 245,730) and as a consequence reduce the overall housing targets for boroughs to give a total of 522,850 dwellings (rather than 649,350).*
- *Delete the Mayor's further suggested change policy H2A small housing developments.*
- *Add to reasoned justification to policy H2 to clarify that borough small site targets can be taken to amount to a reliable source of windfall sites."*

Croydon Revised Inspector's Recommendation	20,790 Ten Year Supply 41,580 by 2039	2079 per year
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This recommended reduction should result in a lower requirement for Croydon (from the 46,040 dwellings stated to 41,580 by 2039) and thus should this reflect a reduction in the figures stated for the Shirley Place Options 1, 2 & 3? (Approx. 9.688 % decrease)

Details:

Shirley Place Option 1:

Summary of housing numbers for each Strategic Spatial Options 2019 – 2039

Dwellings.

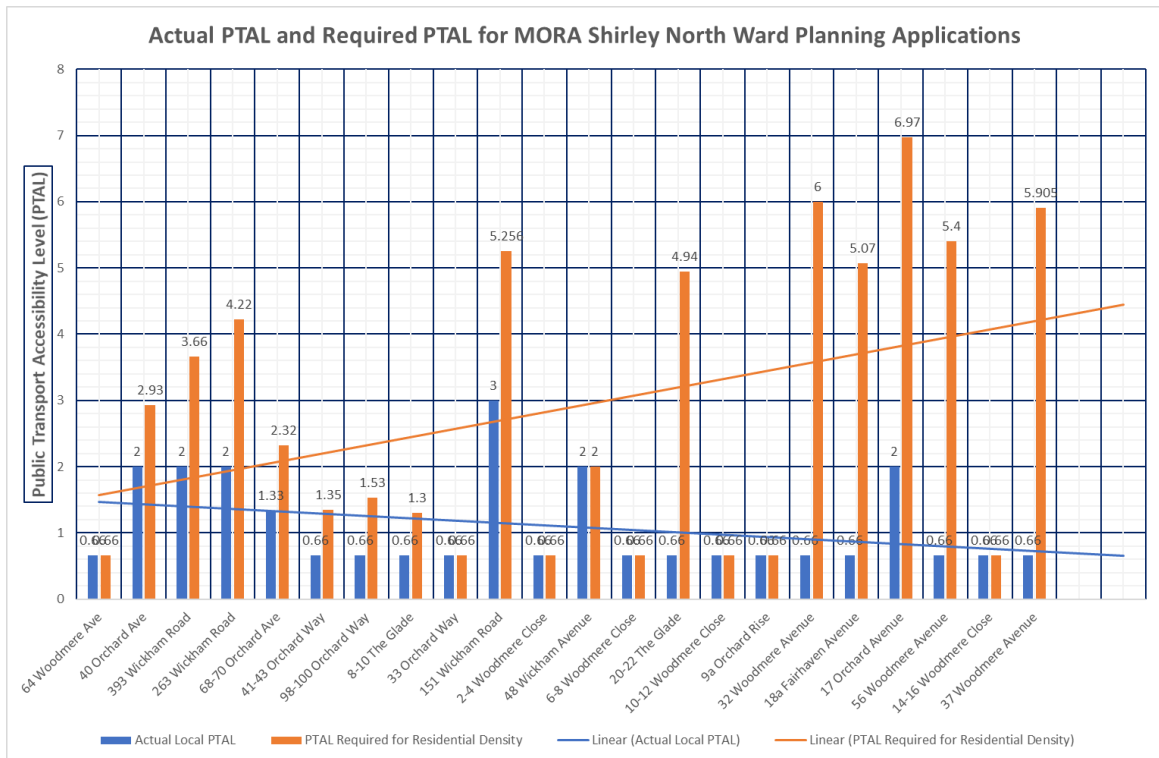
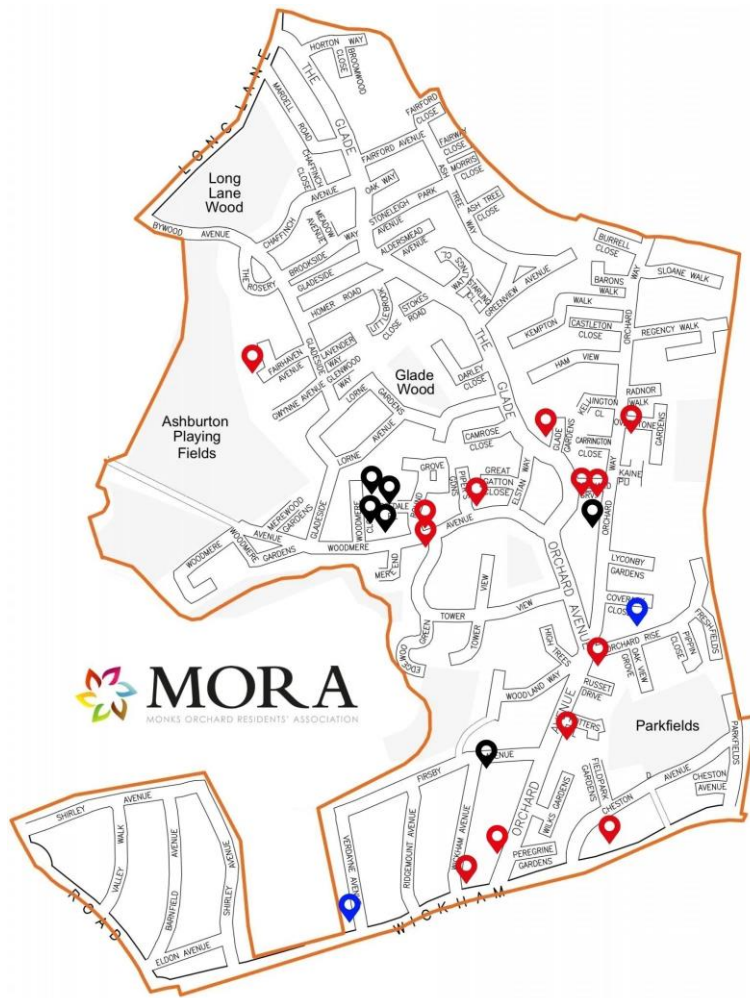
	Strategic Spatial Option 1	Revised Option 1 Approx. 9.688% Reduction
Shirley Dwellings	360 to 460	≈325 to ≈415

Statistics for MORA Post Code Area (part of Shirley North Ward)

Completed			
Location	Reference	New Proposed Dwellings	New Bed Spaces or Occupants
64 Woodmere Ave	15/01507/P	5	26
40 Orchard Ave	15/03885/P	8	24
393 Wickham Road	16/00274/P	7	22
263 Wickham Road	15/04417/P	8	24
68-70 Orchard Ave	16/01838/P	9	64
41-43 Orchard Way	16/04935/FUL	9	32
98-100 Orchard Way	16/03808/P	9	34
8-10 The Glade	17/00262/FUL	9	30
33 Orchard Way	17/03323/FUL	1	5
2-4 Woodmere Close	18/02746/FUL	1	5
6-8 Woodmere Close	18/03917/OUT	1	6
Total		67	272

Approved				
Location	Reference	Date of approval	New Proposed Dwellings	New Bed Spaces or Occupants
9a Orchard Rise	18/06070/FUL	21/03/19	9	41
32 Woodmere Avenue	19/00783/FUL	20/06/19	7	20
18a Fairhaven Avenue	19/01761/FUL	20/06/19	9	33
17 Orchard Avenue	19/00131/FUL	06/11/19	8	23
56 Woodmere Avenue	19/01352/FUL	24/10/19	9	31
14-16 Woodmere Close	19/01484/FUL	23/10/19	1	5
37 Woodmere Avenue	19/03064/FUL	26/09/19	8	26
Totals			51	179

- When does the allocation **360 to 460** start from, as we have already recently seen **67 new dwellings completed** and **approval** for an additional **51 Dwellings** making a total of **118** in just the **MORA Post Code Area**?
- **So how do you arrive at a figure of 18 already under construction?**
- See <http://www.mo-ra.co/>
- The map, table and chart below show the recent approved applications in our Post Code area and the resulting increased residential density.
- **Red** value exceeds Planning Policies for the site, location & PTAL
Blue value considered excessive although not a policy requirement
Orange value on the maximum i.e. just within policy
Black value within policy



Recent approved Developments Required and available PTAL based upon the TfL WebCAT for the Shirley North Ward MORA Post Code Area.

- Development proposals should be “sustainable” and within the available or planned PTAL;
- Redevelopment proposals should respect the existing character of the locality;
- Any Flats should provide adequate “Communal Open Space” as measured in square metres or hectares per resident (or a proportion hectares/per 1000 population) to **respect the existing character**;
- **Residential Density** of proposals should respect the character of the locality and be determined by London Plan “**Characterisation Study**” of the locality as required by **Policy D1A - Infrastructure requirements for sustainable densities** and **NPPF Policy 122 - Achieving Appropriate Densities**;
- It is a waste of effort if the Spatial Planning Team agree and define specific Policies if Development Management and the Planning Committee simply ignore them and do NOT enforce those Policies – in order to meet housing targets?
- Development Management take the view that:

“when determining planning applications, it is important that the decision-taker considers the development plan as a whole, recognising that some policy considerations might not totally align with other issues and approaches. In most cases (All recent Cases) we feel that the need to deliver more housing should reasonably counter density, car parking or amenity effects (unless serious harm is caused by the scale of development for whatever reason)”.

Pete Smith – Head of Development Management
18th December 2019

Response to our Stage 1 Complaint (CAS-123091-Y3J7R2)
56 Woodmere Avenue

- Define “**Serious harm**”!
- Define “**Reasonably counter**”!
- See <http://www.mo-ra.co/planning/planning-complaints/>

What Policies are of significance that, if breached, would warrant a refusal of a development proposal and for an applicant to amend that proposal and re-submit that application in order to meet approved planning policies ... rather than the “**Development Management**” view (see above) that those policies should be overlooked and that “**inferior or unsuitable and inappropriate development proposals**” should be “**approved**” in order to provide much needed additional **housing!**

Each Policy ignored or disregarded **without credible justification** sets a **precedent** which subsequent applicants can allude to for equal reason to disregard or breach the Policy, ultimately resulting in a Local Plan with Policies that **cannot be enforced**.

The **Local Plan Review** consultation might just result in a Plan without any possible **enforceable Policies** to **manage development proposals to meet the housing targets** as the policies become **less and less enforceable**.