

Representation Form for the Croydon Local Plan Review 2019:

		Personal Details
1.	Representation Number:	MORA #018
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 - (Ch3 The Shirley Place Intro & Strategic Options)

Policy

SO2

Option

Option 2

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 2 –
Major redevelopment of the Purley Way area to reduce some pressure off residential growth in the existing urban area.

Homes already under construction

18

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

360 to 450

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.

MORA Comment:

- Shirley is designated as **Suburban** – NOT **Urban**;
- Shirley has a couple of **Urban** Shopping parades but the rest is **Suburban**;
- Focussed Intensification area designation has no “**Characterisation Study**” to determine the appropriate **Residential** or **Housing** Density;
- The Residential areas of Shirley have had no “Characterisation Study” to determine appropriate Densities for the various types of architecture and characters of the Shirley Place;
- The homes already under construction at **18** does NOT seem correct (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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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 2:

Summary of housing numbers for each Strategic Spatial Options 2019 – 2039 (20 yrs.)

	Strategic Spatial Option 2	Revised Option 1 Approx. 9.688% Reduced
Shirley Dwellings	360 to 450	≈325 to ≈406

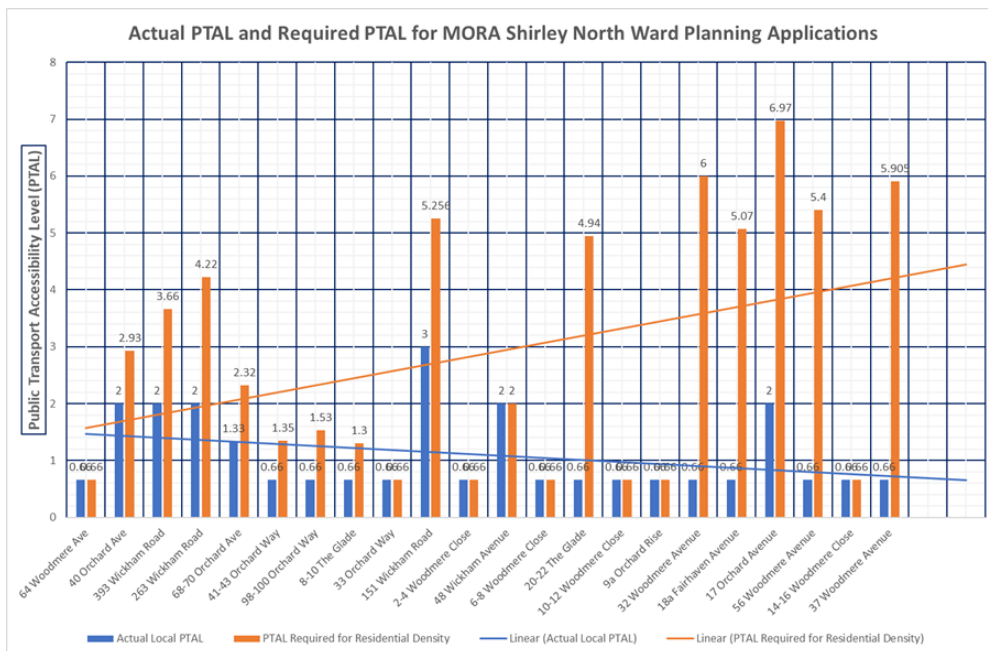
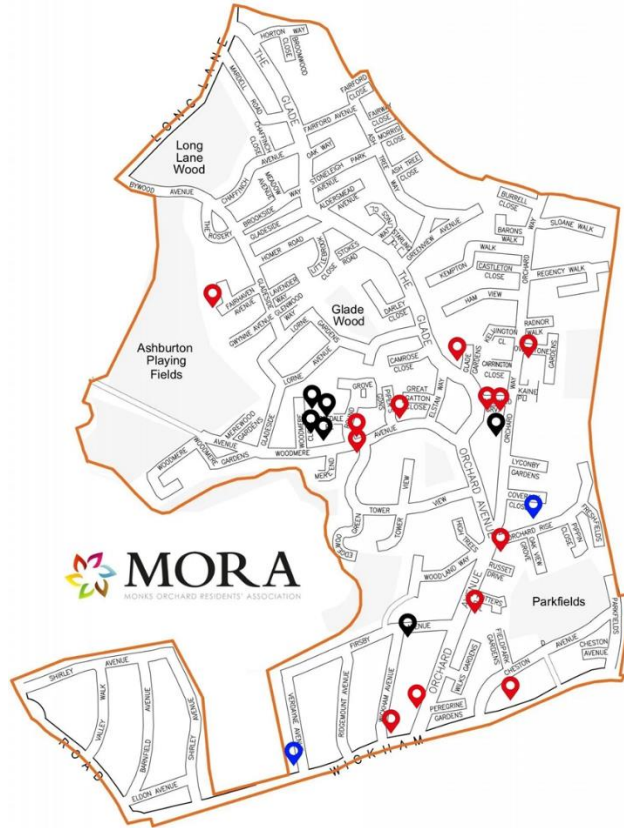
Statistics for MORA Post Code Area (part of Shirley North Ward)

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 450** 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 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 infrastructure (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.
- 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**.