

Representation Form for the Croydon Local Plan Review 2019:

		Personal Details
1.	Representation Number:	MORA #021
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	██████████
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	Postcode	██████████
6.	Email Address	planning@mo-ra.co

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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 – CLP2 Clarifications**

Policy **DM10** 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 Patra 16**.

Par a)	<input checked="" type="checkbox"/>	Par b)	<input checked="" type="checkbox"/>
Par c)	<input checked="" type="checkbox"/>	Par d)	<input checked="" type="checkbox"/>
Par e)	<input checked="" type="checkbox"/>	Par f)	<input checked="" type="checkbox"/>

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).

CLP2	CLP2 Policy Text	CLP2 Issues or clarification for CLP3
Policy SP2:	Homes	
Policy DM1	Housing choice for sustainable communities	
DM1.1		
DM1.2	Permit the redevelopment of the residential units where it does not result in the net loss of 3-bedroom homes (as originally built) or the loss of homes smaller than 130m ² .	Clarify 130m ² is the footprint or GIA as that would preclude bungalows with larger footprint than 130m ² and are prevalent in Shirley) (Possibly because bungalows are Not effective use of Land but preferred by the elderly).
Policy DM5	Development in Neighbourhood Centres	Neighbourhood Centres – Any changes proposed for CLP3?
DM5.1	The Council will ensure that the vitality and viability of Neighbourhood Centres are maintained and enhanced and that they continue to provide a level of service of neighbourhood significance.	How? What are the criteria to ensure vitality and viability to be judged against?
DM5.2	In the vicinity of Neighbourhood Centres, development proposals: a. For A1-A5 uses, B1 uses and community facilities should be of a reasonable scale, proportionate to serve a neighbourhood need and have a clear relationship to other facilities within the centre. Guidance is given in Appendix 4; b. Must accord with Table 5.5; and c. Demonstrably relate to the Neighbourhood Centre, be in scale and be within reasonable walking distance to other retail and community uses within the centre.	a) how do you define a “clear relationship with other facilities” within the Centre? b) Table 5.5 - New development proposals and changes of use in the vicinity of Neighbourhood Centres – are these to be carried forward to CLP3 or are there any additions? How do you interpret “demonstrably relate to the neighbourhood” and be in scale? And what is a reasonable walking distance to other retail and community uses within the Centre? Too subjective unless clarified. NPPF 16 d) pertains.
Policy DM7	Development in Restaurant Quarter Parades	
	The designated Restaurant Quarter Parades will ensure the vitality and viability is maintained and increased and that it continues to serve local communities by ensuring new development proposals and changes of use are in accordance with Table 5.9.	How to ensure the vitality and viability is maintained? By what criteria? Table 5.9 – Any additions or changes to Table 5.9 proposed for CLP3? Table 5.10 – Any additions or changes to Table 5.10 proposed for CLP3?

Policy DM8	Development in edge of Centre & out of Centre locations	
	<p>The Council will ensure the vitality and viability of the borough's town centres is maintained and increased by:</p> <p>a. Ensuring new development proposals for main town centre uses in edge of centre and out of centre locations are in accordance with Table 5.11 and Table 5.12; and</p> <p>b. Applying planning conditions to control the subdivision of units, extensions (including mezzanines), and the range and mix of convenience and comparison goods sold.</p>	<p>How?</p> <p>What are the criteria to be judged against?</p> <p>Table 5.11 - Development of main town Centre uses in edge of Centre and out of Centre locations & Table 5.12 - Definition of edge of Centre and out of Centre location (informed by Annex 2 of the National Planning Policy Framework) – are there any additions or proposed changes to either Table 5.11 or Table 5.12?</p> <p>On what grounds can planning conditions be required to meet these requirements? Are any changes proposed for CLP3</p>