

**Representation Form for the Croydon Local Plan Review 2019:**

		<b>Personal Details</b>
1.	<b>Representation Number:</b>	<b>MORA #022</b>
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	<b>Monks Orchard Residents' Association</b>
5.	Address Line 1	██████████
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6.	Email Address	<a href="mailto:planning@mo-ra.co">planning@mo-ra.co</a>

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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:

Policy       Option       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**.

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"/>

**The following comments and clarifications relate to the current Croydon Local Plan (2018) which requires clarification in order to meet NPPF (2018/19) Para 16 - Plan Making:**

**Plan Making**

**16. Plans should:**

- a) be prepared with the objective of contributing to the achievement of sustainable development<sup>10</sup>;
- 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
<b>Policy SP3:</b>	<b>Employment</b>	
<b>Policy DM4</b>	<b>Development in Croydon, District &amp; Local Centres</b>	
DM4.1	The Council will ensure that the vitality and viability of Croydon Metropolitan Centre and the borough's District and Local Centres is maintained and increased by not permitting new developments or changes of use which would result in a net loss of ground floor <sup>36</sup> Class A uses within Main Retail Frontages (unless it relates to the expansion of an existing community use).	<p>How to ensure the “vitality and viability” is maintained?</p> <p>What are the criteria to ensure vitality and viability to be judged against?</p>
DM4.2	Within Croydon Metropolitan Centre and the borough's District and Local Centres development proposals and changes of use on the ground floor must accord with <b>Table 5.3</b> .	<p>Table 5.3 New development proposals and changes of use in Croydon Metropolitan Centre and District and Local Centres. Are there any additional proposals for CLP3?</p> <p>Any Comments?</p>
DM4.3	Outside of Main and Secondary Retail Frontages, but within centres, proposals for mixed use developments will be required to either: <ul style="list-style-type: none"> <li>a. Demonstrate that a specific end user will be occupying the ground floor unit upon completion; or</li> <li>b. Provide a free fitting out of all ground floor units for the eventual end occupier to ensure that the unit is capable of occupation and operation by the end user and ensure that the ground floor units are capable of conversion to the same use as the remainder of the building if after two years, subsequent to completion, no end user has been found for the ground floor unit.</li> </ul>	<p>Define the logic for this policy</p> <ul style="list-style-type: none"> <li>a) Why?</li> <li>b) Why? Give Reasoning?</li> </ul>
<b>Policy DM5</b>	<b>Development in Neighbourhood Centres</b>	<b>Neighbourhood Centres – Any changes proposed for CLP3?</b>
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.	<p>How?</p> <p>What are the criteria to ensure vitality and viability to be judged against?</p>
DM5.2	In the vicinity of Neighbourhood Centres, development proposals: <ul style="list-style-type: none"> <li>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;</li> </ul>	<p>a) how do you define a “reasonable scale”, “clear relationship” with other facilities within the Centre? Is this clarified at Appendix 4?</p>

	<p>b. Must accord with Table 5.5; and</p> <p>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.</p>	<p>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?</p> <p>c) How do you interpret “<i>demonstrably relate to the neighbourhood</i>” and be “<i>in scale</i>”? And what is a reasonable walking distance to other retail and community uses within the Centre? Too subjective.</p> <p>NPPF 16 d) pertains.</p>
<b>Policy DM6</b>	<b>Development in Shopping Parades</b>	<b>Shopping Parades</b>
	The Council will ensure that the vitality and viability of the borough’s Shopping Parades is maintained and increased and that they continue to serve local communities by ensuring new development proposals and changes of use on the ground floor are in accordance with Table 5.7.	<p>Table 5.7 - New development proposals and changes of use in Shopping Parades</p> <p>Are there any proposed changes for Table 5.7 in CLP3?</p> <p>Table 5.8 - Are there any additions or changes to Designations in Table 5.8 in CLP3?</p>
<b>Policy DM7</b>	<b>Development in Restaurant Quarter Parades</b>	
	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.	<p>How to ensure the “<i>vitality and viability</i>” is maintained? By what criteria?</p> <p>Table 5.9 – Any additions or changes to Table 5.9 proposed for CLP3?</p> <p>Table 5.10 – Any additions or changes to Table 5.10 proposed for CLP3?</p>
<b>Policy DM8</b>	<b>Development in edge of Centre &amp; out of Centre locations</b>	
	The Council will ensure the vitality and viability of the borough’s town centres is maintained and increased by:	<p>How?</p> <p>What are the criteria to be judged against?</p> <p>a) Table 5.11 - Development of main town Centre uses in edge of Centre and out of Centre locations &amp; Table 5.12 - Definition of</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	

	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>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>b) On what grounds can planning conditions be required to meet these requirements? Are any changes proposed for CLP3</p>
<b>Policy DM9</b>	<b>Expansion of industrial and warehousing premises in Strategic, Separated and Integrated Industrial Locations</b>	
	Within the Strategic, Separated and Integrated Industrial Locations identified in Table 5.2 of Policy SP3.2, the Council will encourage the redevelopment of low density industrial and warehousing premises with higher density industrial and warehousing premises.	<p>Are any changes or additions proposed for Table 5.2 of Policy SP3.2 in CLP3?</p> <p>What are the criteria to encourage the redevelopment?</p>