

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

		<b>Personal Details</b>
1.	<b>Representation Number:</b>	<b>MORA #025</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	██████████
	Address Line 2	████████████████████
	Address Line 3	██████████
	Postcode	██████████
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: **CLP review – CLP2 Clarifications**

Policy **SP6**      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"/>

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
Policy SP6	Environment & Climate Change	
Policy	Development & Construction	
	<p>The Council will promote high standards of development and construction throughout the borough by:</p> <p>a. Ensuring that future development, that may be liable to cause or be affected by pollution through air, noise, dust, or vibration, will not be detrimental to the health, safety and amenity of users of the site or surrounding land;</p> <p>b. Ensuring that developments are air quality neutral and do not lead to further deterioration of existing poor air quality;</p> <p>c. Ensuring mitigation measures are put in place to reduce the adverse impacts to acceptable levels. Where necessary, the Council will set planning conditions to reduce the impact on adjacent land uses to acceptable levels, relative to ambient noise levels and the character of the locality; and</p> <p>d. Encouraging the use of sustainable and innovative construction materials and techniques in developments.</p>	<p>a. This statement is meaningless unless some limits are specified which allows a challenge to be sustained. What limits air pollution, noise pollution (dBA), dust pollution, vibration as measured by disturbance and frequency range 0.5Hz to 250Hz and is in units of acceleration, velocity or displacement are required and over what duration?</p> <p>b. Again, this statement is meaningless unless qualified by specific limits; Air quality &amp; Particulates etc.</p> <p>c. What levels are acceptable? Otherwise this is also meaningless unless quantified.</p> <p>(these statements are objectives – not policy as they have no definition of limitations).</p>
Policy	Land Contamination	
DM24.1	<p>The Council will permit development proposals located on or near potentially contaminated sites, provided that detailed site investigation is undertaken prior to the start of construction in order to assess:</p> <p>a. The nature and extent of contamination; and</p> <p>b. The production of landfill gases and the potential risks to human health, adjacent land uses and the local environment.</p>	<p>(How measured?) Who is qualified to investigate and to what criteria?</p>
DM24.2	<p>Where the assessment identifies <b>unacceptable</b> risks to human health, adjacent land uses or the local environment, site remediation and aftercare measures will be agreed or secured by condition to protect the health of future occupants or users.</p>	<p>Who and what defines an “unacceptable risk” criteria?</p>
DM24.3	<p>All development proposals on contaminated sites should be accompanied by a full risk assessment, which takes into account existing site conditions.</p>	<p>Again, who defines the parameters of risk assessment? Without clear definition of the risk assessment, these statements are purely subjective and could not withstand a challenge.</p>

Policy	SuDS & Reducing Flood Risk															
DM25.1	<p>The Council will ensure that development in the borough reduces flood risk and minimises the impact of flooding by:</p> <ul style="list-style-type: none"> <li>a. Steering development to the areas with a lower risk of flooding;</li> <li>b. Applying the Sequential Test and Exception Test in accord with Table 8.1;</li> <li>c. Taking account of all sources of flooding from fluvial, surface water, groundwater, sewers, reservoirs and ordinary watercourses; and</li> <li>d. Applying the sequential approach to site layout by locating the most vulnerable uses in parts of the site at the lowest risk of flooding.</li> </ul>	<p>a) How do you steer a developer to areas with lower risk of flooding when <u>all</u> proposals are for a specific site?</p> <p>Refer to Environment Agency Flood and surface water maps?</p>														
DM25.2	<p>In areas at risk of flooding development should be safe for the lifetime of development and should incorporate flood resilience and resistant measures into the design, layout and form of buildings to reduce the level of flood risk both on site and elsewhere.</p>	<ul style="list-style-type: none"> <li>i. Who defines Flood Resilience and Resistance measures?</li> <li>ii. How far from the development should the reduction of risk of flooding be required (on-site and elsewhere)?</li> </ul>														
DM25.3	<p>Sustainable drainage systems are required in all development and should:</p> <ul style="list-style-type: none"> <li>a. Ensure surface run-off is managed as close to the source as possible;</li> <li>b. Accord with the London Plan Sustainable Drainage Hierarchy;</li> <li>c. Achieve better than greenfield runoff rates;</li> <li>d. Be designed to be multifunctional and incorporate sustainable drainage into landscaping and public realm to provide opportunities to improve amenity and biodiversity;</li> <li>e. Achieve improvements in water quality through a sustainable drainage system management train; and</li> <li>f. Be designed with consideration of future maintenance.</li> </ul>	<p>What effect does London Clay Subsoil have on the SuDS drainage system?</p> <table border="1" data-bbox="1167 943 2072 1166"> <thead> <tr> <th data-bbox="1167 943 1323 1129">Local Authority</th> <th data-bbox="1323 943 1509 1129">Compatible for infiltration SuDS</th> <th data-bbox="1509 943 1695 1129">Probably compatible for infiltration SuDS</th> <th data-bbox="1695 943 1906 1129">Opportunities for bespoke infiltration SuDS</th> <th data-bbox="1906 943 2072 1129">Very significant constraints indicated</th> </tr> </thead> <tbody> <tr> <td data-bbox="1167 1129 1323 1166">Croydon</td> <td data-bbox="1323 1129 1509 1166">26%</td> <td data-bbox="1509 1129 1695 1166">5%</td> <td data-bbox="1695 1129 1906 1166">23%</td> <td data-bbox="1906 1129 2072 1166">46%</td> </tr> </tbody> </table> <p>British Geological Survey Table 3 - Suitability of the subsurface for infiltration SuDS within unitary authority areas (%) calculated from the 'Drainage Summary' layer of the Infiltration SuDS.</p> <p>Thus 46% of Croydon has very significant constraints and is therefore unsuitable for SUDS and only 31% compatible or</p>					Local Authority	Compatible for infiltration SuDS	Probably compatible for infiltration SuDS	Opportunities for bespoke infiltration SuDS	Very significant constraints indicated	Croydon	26%	5%	23%	46%
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		<p>probably suitable for SUDS and 23% area would require bespoke SUDS infiltration systems.</p> <p>Do Croydon LPA know the suitable or unsuitable areas?</p> <p>If so, these areas should be marked on the Policies Map of designated areas.</p> <p>If NOT so, they should establish these areas from the British Geological Survey and mark them up.</p>
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