

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

		Personal Details
1.	Representation Number:	<b>MORA #026</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:

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
Policy SP7	Green Grid	
Policy DM26	Metropolitan Green Belt, MOL	
DM26.1	The Council will protect and safeguard the extent of the borough's Metropolitan Green Belt and Metropolitan Open Land as designated on the Policies Map by applying the same level of protection afforded to Metropolitan Green Belt in national planning policy to Metropolitan Open Land in the borough.	<a href="#">Check Ashburton Playing Fields - Parklife Project</a>
DM26.2	Extensions to existing buildings in Metropolitan Green Belt and Metropolitan Open Land should not be more than <b>20% of their original<sup>79</sup> floor space</b> or volume, or <b>100m<sup>2</sup></b> (whichever is the smaller) unless they are for agricultural use, forestry, or facilities for <b>outdoor sport</b> , outdoor recreation or cemeteries.	<a href="#">Check Ashburton Playing Fields - Parklife Project</a>
DM26.3	Extensions to existing buildings in Metropolitan Green Belt and Metropolitan Open Land that are <b>less than 20% of the original floor space</b> or volume, <b>or less than 100m<sup>2</sup></b> in extent (whichever is the smaller) and extensions for agricultural use, forestry, or facilities for outdoor sport, outdoor recreation or cemeteries may still be disproportionate. In considering whether they are disproportionate and also whether a new replacement dwelling is materially larger or, if any proposed structure harms the openness of Metropolitan Green Belt or Metropolitan Open Land the Council will have regard to: a. Changes in the floor space and volume of buildings; b. The floor space and volume of all previous extensions (since 1948), alterations and developments within the curtilage of the dwelling; c. Use of basements and roof spaces as living areas; d. Whether there is an increase in the spread of buildings across the site, in particular where visible from public vantage points; e. The size of the curtilage and character of the surrounding area; and f. Whether ancillary structures have an urbanising effect.	<a href="#">See Also Draft London Plan Chapter 8</a>

Policy DM27	Protecting & Enhancing our Biodiversity	
	<p>To enhance biodiversity across the borough and improve access to nature, development proposals should:</p> <ul style="list-style-type: none"> <li>a. Incorporate biodiversity on development sites to enhance local flora and fauna and aid pollination locally;</li> <li>b. Incorporate biodiversity within and on buildings in the form of green roofs, green walls or equivalent measures;</li> <li>c. Incorporate productive landscapes in the design and layout of buildings and landscaping of all major developments<sup>80</sup>;</li> <li>d. Have no adverse impact on land with biodiversity or geo-diversity value as designated on the Policies Map; and</li> <li>e. Have no adverse impact on species of animal or plant or their <b>habitat protected</b> under British or European law, highlighted within a local/regional Biodiversity Action Plan, or when the Council is presented with evidence that a <b>protected species would be affected</b>.</li> </ul>	<ul style="list-style-type: none"> <li>a) Define what is required to incorporate biodiversity on development sites.</li> <li>e) What is the policy in the event of planning applications where protected species are present?</li> </ul> <p><b>Note:</b></p> <p><b>Woodland Land Owners can just chop down and clear areas of designated woodland as long as it is within the '5 Cubic metre' License threshold set by the forestry commission.</b></p> <p><b>Over a period of time, this 5 Cubic metre cumulatively results in the decimation of the woodland such that the criteria for the designation of "<u>Nature Conservation</u>" is demolished and the designation subsequently challenged by the land owner, which then allows development proposals on the previously site of "<u>Nature Conservation Importance</u>" to be NOT so important and the designated land become available for development.</b></p> <p><u>The Croydon Local Plan at DM27 - Protecting and enhancing our biodiversity, does not provide any protection in such situations and correspondence with the Planning Department has confirmed such a situation.</u></p>
Policy DM28	Trees	
	<p>The Council will seek to protect and enhance the borough's woodlands, trees and hedgerows by:</p>	<ul style="list-style-type: none"> <li>b) Avoidable is understood to require the design of the development footprint to avoid loss of existing trees - How is this enforced?</li> </ul>

- a. Ensuring that all development proposals accord with the recommendations of **BS5837 2012** (Trees in relation to design, demolition and construction) or equivalent;
- b. Not permitting development that results in the avoidable loss or the excessive pruning of preserved trees or retained trees where they make a contribution to the character of the area;
- c. Not permitting development that could result in the future avoidable loss or excessive pruning of preserved trees or trees that make a contribution to the character of the area;
- d. Not permitting development resulting in the avoidable loss or deterioration of irreplaceable habitats, including ancient woodland, hedgerows and veteran trees; and
- e. Producing a tree strategy outlining how the local authority will manage its tree stock and influence the management of those trees subject to a Tree Preservation Order.

- c) **Avoidable is understood to mean to design the development footprint to avoid loss of existing trees - How is this enforced?**
- d) **Avoidable is understood to mean to design the development footprint to avoid loss of existing trees - How is this enforced?**
- e) **Replacement of all lost trees with mature specimens as replacements on site or adjacent public land.**