

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

		<b>Personal Details</b>
1.	<b>Representation Number:</b>	<b>MORA #027</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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	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 DM30	Car & Cycle Parking in New Development	
	<p>To promote sustainable growth in Croydon and reduce the impact of car parking new development must:</p> <p>a. Reduce the impact of car parking in any development located in areas of good public transport accessibility<sup>97</sup> or areas of existing on-street parking stress;</p> <p>b. Ensure that the movement of pedestrians, cycles, public transport and emergency services is not impeded by the provision of car parking;</p> <p>c. Ensure that highway safety is not compromised by the provision of car parking including off street parking where it requires a new dropped kerb on the strategic road network and other key roads identified on the Policies Map;</p> <p>d. If the development would result in the loss of existing car parking spaces, demonstrate that there is no need for these car parking spaces by reference to occupancy rates at peak times;</p> <p>e. Provide car and cycle parking spaces as set out in Table 10.1;</p> <p>f. Ensure that cycle parking is designed so that it is secure and can also be used for parking for mobility scooters and motor cycles; and</p> <p>g. Provide car parking for affordable homes at an average rate not less than 2/3 that of other tenures.</p>	<p><b>Residential on-street parking reduces available road width and causes congestion.</b></p> <p><b>The limit of parking provision in new developments has resulted in overspill onto local residential roads which in some cases is causing traffic flow problems and also more minor incidents through bad parking. It would be beneficial to allow more on-site, off-street parking than create localised traffic congestion.</b></p> <p><b>There is no legal requirement to prevent car ownership so planning policies to restrict car ownership in suburban settings only results in overspill to on-street parking causing local congestion.</b></p> <p><b>The adopted London Plan recognises this dilemma and allows increased off-street parking at low PTALS in Outer London Boroughs (See Residential Parking Standards - Table 6.2.) stating:</b></p> <p><b><u>“In outer London Boroughs with Low PTAL’s (generally PTAL’s 0 to 1) boroughs should consider higher levels of provision, especially to address ‘overspill’ parking pressures”</u></b></p> <p><b>Some residential streets have significant parking stress as historically minimal off-street parking has been provided. (Built in an era of very low car ownership). Planning Policies are trying to recreate such provision without an economical or legal reason to support the policy. You cannot buck the market – if people have the freedom and money to purchase a car they will do so, irrespective of where they live!</b></p>