



To:

Ms Nicola Townsend - Head of Development
Management
Mr Steve Dennington – Head of Spatial Planning.
Development and Environment
6th Floor
Bernard Weatherill House
8 Mint Walk
Croydon
CR0 1EA

Email: Nicola.Townsend@croydon.gov.uk
Steve.Dennington@croydon.gov.uk

From:

**Monks Orchard Residents'
Association - Planning**

21st September 2020

Emails: planning@mo-ra.co
chairman@mo-ra.co
hello@mo-ra.co

Local Plan Review “Focussed Intensification” – Shirley Wards.

Dear Ms Townsend & Mr Dennington

I would like to clarify with you the current situation in relation to the “**Focussed Intensification**” designation **DM10.11** along the **Wickham Road, Shirley**.

We understand that a letter has been sent to a number of Shirley Residents from our **MP Sarah Jones** indicating that due to the **unlikely improvement foreseen in Public Transport infrastructure serving the low PTAL areas of Shirley, the “Focussed Intensification” along the Wickham Road has been proposed to be de-designated.**

See extract from Sarah Jones MP letter, the basis of which is:

“I am writing to let you know some news about planning developments in Shirley. As you may be aware, parts of Shirley along the Wickham Road were designated a ‘Focussed Intensification area’ which meant that more intensive developments could be allowed along our high street.

*Many people in Shirley were concerned that we do not have the infrastructure to withstand intensive development and there was a risk that the character of the area might be affected. I am writing to let you know that the Council has listened to those concerns and concluded that **Shirley will no longer be categorised as a ‘focused intensification area’.** Their planning update states:*

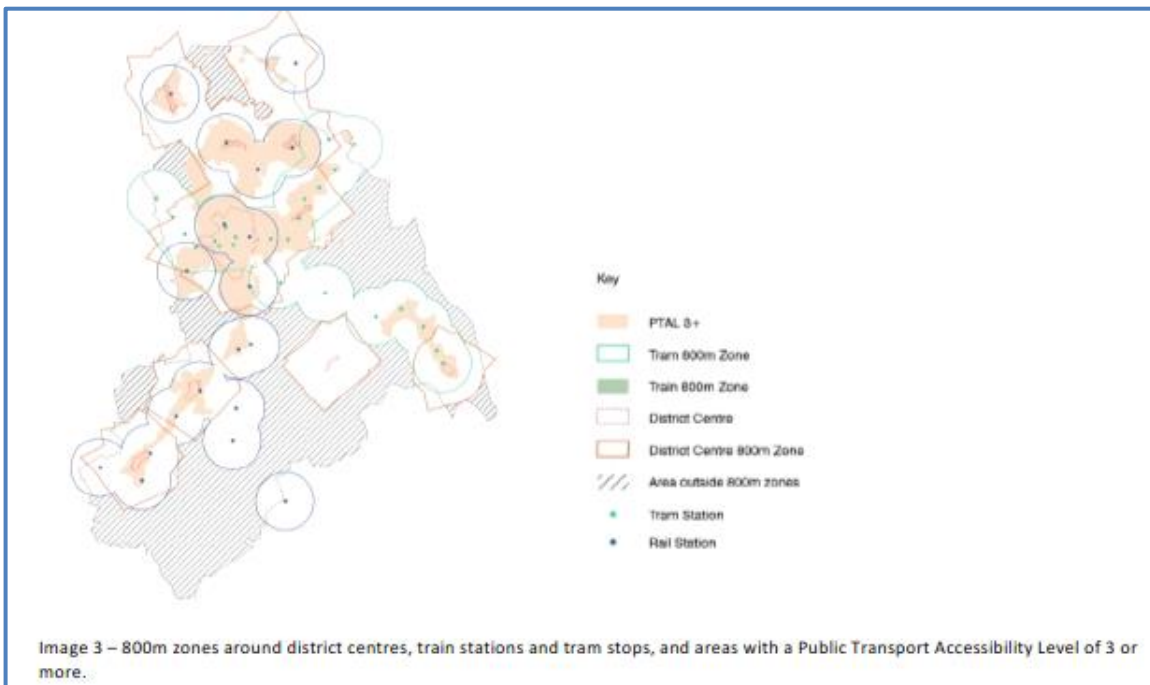
*‘It looks increasingly unlikely that significant improvements to the public transport capacity in the Shirley area will be delivered over the period covered by the local plan and hence the area only has capacity for **limited future growth.**’*

*I think this is a sensible outcome. We desperately need more homes in Croydon and homelessness is very high, but clearly developments must have **infrastructure to support them and be sustainable.** ...”*

We assume that the Policies Map will need to be changed accordingly and the Local Plan updated to reflect this change in policy.

However, according to the Local Plan Review, the adoption of the new Revised Croydon Local Plan is forecast currently to be March 2022.

Local Plan review	
<p>The timetable for preparing the document</p>	<p>Evidence gathering: Autumn 2018 – Summer 2019</p> <p>Preferred and alternative options: Autumn 2019</p> <p>Proposed submission: Autumn 2020</p> <p>Submission: Winter 2021</p> <p>Examination: Spring 2021</p> <p>Adoption: March 2022</p>



This illustration shows the Shirley Area has very poor access to Public Transport

See: Windfall or “small sites” evidence-based Croydon Local Plan Partial Review 2019 dated November 2019 at paras 1.7 & 1.8

1.7 The typologies of housing shown above are further differentiated into areas inside and outside of 800 metres from a train station, tram stop or district centre, alongside the percentage of the typology which sits within a conservation area.

1.8 The differentiation between areas inside and outside of this 800m zone affects their likelihood of coming forward as part of a windfall development, which we have for the purpose of this study defined as a 'participation rate'.

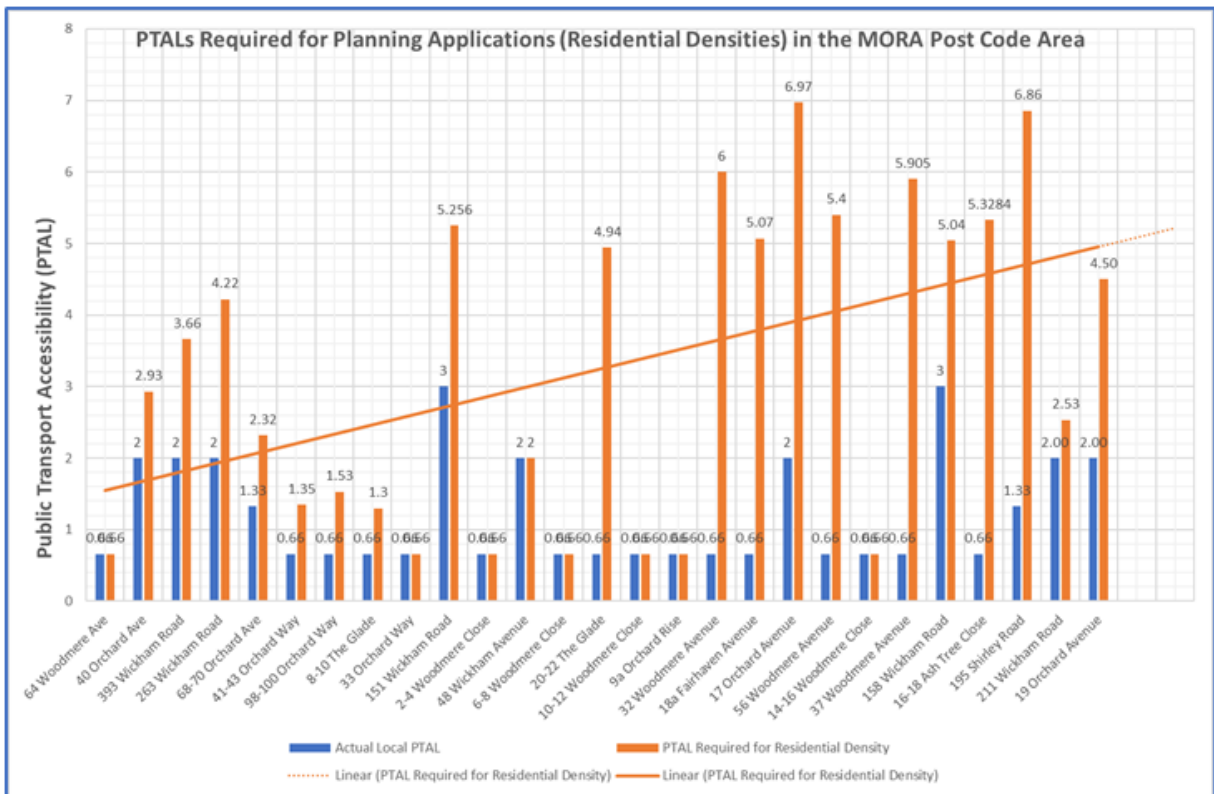
This new policy aligns with the draft emerging London Plan which defines limitations of "Incremental Intensification" which states at para 4.2A.1:

"Incremental Intensification" of existing residential areas within PTALs 3-6 or within 800m distance of a Train/(Tram) station or Town Centre Boundary is expected to play an important role in contributing towards the housing targets for small sites ...

Inferring that below localities of PTAL 3 and greater than 800m from a Train/(Tram) Station or Town Centre Boundary are exempt from "Incremental Intensification" as the Public Transport Accessibility would not support the increase in development (i.e. the increase in Density of population served).

If the current policy remains in place until March 2022, the Wickham Road could undergo significant change of character by "Focussed Intensification" with no increase in Public Transport to support it, which would result in "Unsustainable Developments" as defined by the proposed policy.

To continue to allow proposals of "Focussed Intensification" when it has been agreed that the Supporting Infrastructure is clearly unlikely to be delivered, any additional approvals of "Focussed Intensification" would result in further "Unsustainable Developments" in Shirley, if allowed. (e.g. 19 Orchard Avenue Ref 20/03721/FUL).





Cllr, Paul Scott has always argued that ‘Transport Infrastructure’ would follow the increase in ‘development’ but this policy suggests otherwise, that infrastructure (existing or planned) should support the proposed developments ^[1]. We, “MORA” have been arguing this reasoning when formulating our objections ever since the Local Plan was drafted prior to its 2018 adoption but it fell on deaf ears in the Development Management Department! The result of this policy has resulted in significant increase of ‘Unsustainable Developments’ being approved in the MORA Post Code Area as defined by the current adopted London Plan Policy or the TfL WebCAT guidance.

(see: ‘Histogram’ above and <http://www.mo-ra.co/planning/planning-matrix/> & <http://www.mo-ra.co/planning/planning-complaints/>).

NPPF (2019) Paras 12, 32 & Chapter 9 Promoting Sustainable Transport para 102 and NPPF Para 122 – Achieving Appropriate Densities:

12. The **presumption** in favour of **sustainable development** does not change the statutory status of the **development plan** as the starting point for decision making. Where a planning application **conflicts with an up-to-date development plan** (including any neighbourhood plans that form part of the development plan), **permission should not usually be granted**. Local planning authorities may take decisions **that depart** from an **up-to-date development plan**, but only if **material considerations in a particular case indicate that the plan should not be followed**.
32. Local plans and spatial development strategies should be informed throughout their **preparation by a sustainability appraisal** that meets the relevant legal requirements¹⁷. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives **should be avoided** and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. **Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed** (or, where this is not possible, **compensatory measures should be considered**).

9. Promoting Sustainable Transport:

102. Transport issues should be considered from the **earliest stages of plan-making and development proposals**, so that:
 - a) the potential **impacts of development on transport networks** can be addressed;
 - b) opportunities from **existing or proposed transport infrastructure**, and changing transport technology and usage, **are realised** – for example in relation to the scale, location or **density of development that can be accommodated**;
 - d) the **environmental impacts** of traffic and **transport infrastructure can be identified, assessed and taken into account** – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains;

[1] There is no linkage subsequent to a development approval and the supply of infrastructure. There is only a linkage between infrastructure (existing and planned) at the time of an Application Proposal.



Achieving appropriate densities:

122. Planning policies and decisions should support development that makes efficient use of land, **taking into account:**

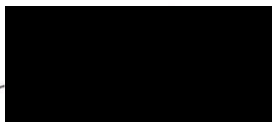
- a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
- b) local market conditions and viability;
- c) the **availability and capacity of infrastructure and services** – both existing and proposed – as well as their potential for further improvement and the scope to **promote sustainable travel modes that limit future car use;**
- d) the desirability of maintaining **an area's prevailing character** and **setting (including residential gardens)**, or of promoting regeneration and change; and
- e) the importance of securing well-designed, attractive and healthy places.

On the **assumption** that the "**Focussed Intensification**" policy **will change** for the **Shirley Wards** on the **adoption** of the **Revised Local Plan**, it would be **beneficial** if the **LPA** depart from the **current policy DM10.11** for the **Shirley Wards** on the grounds that a **Material Consideration of Sustainable Development requiring improved Public Transport Infrastructure for the area is extremely unlikely to be forthcoming to support "Focussed Intensification"** as stated at **NPPF guidance, para 12** and supported by **NPPF paras 32, Chapter 9 Promoting Sustainable Transport** and as supported at **para 102** and at **para 122 - Achieving Appropriate Densities.**

Please consider this reasoning to agree an early change to policy **DM10.11** for the **Shirley Wards** along the **A232 Wickham Road** in order to prevent further developments with '**Unsustainable Transport Infrastructure**' in acknowledging receipt of this emailed letter and give it your expert interpretation and consideration as guided by the **NPPF para 12** such that we can inform our Residents of your assessment to remove **DM10.11** Policy from **Shirley.**

Kind regards

Derek



Derek C. Ritson - I. Eng. M.I.E.T.
(MORA Executive Committee - Planning).
Monks Orchard Residents' Association.



Sony Nair – Chairman,
Monks Orchard Residents'
Association.

Cc:

Sarah Jones MP

Cllr. Sue Bennett (Shirley North)

Cllr. Richard Chatterjee (Shirley North)

Cllr. Gareth Streeter (Shirley North)

MORA Executive Committee

Cllr. Jason Cummings (Shirley South)

Cllr. Scott Roche (Shirley South)

Trevor Ashby (Chair Shirley Planning Forum)