


Representation Form for Croydon Local Plan Review

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Name of the Local Plan to which this representation relates:

**Croydon Local Plan
(Revised) December
2021**

Please return to [ldf@croydon.gov.uk] BY [5:00pm on 17/02/2022]

NB - LPA to include data protection / privacy notice, see para 4 of Explanatory Note

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

2. Agent's Details (if applicable)

Title	<input type="text" value="Mr"/>	<input type="text"/>
First Name	<input type="text" value="Derek"/>	<input type="text"/>
Last Name	<input type="text" value="Ritson"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value="Not Applicable"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="Monks Orchard Residents' Association"/>	<input type="text"/>
Address Line 1	<input type="text" value="[REDACTED]"/>	<input type="text"/>
Line 2	<input type="text" value="Shirley"/>	<input type="text"/>
Line 3	<input type="text" value="Croydon"/>	<input type="text"/>
Post Code	<input type="text" value="[REDACTED]"/>	<input type="text"/>
E-mail Address	<input type="text" value="planning@mo-ra.co"/>	<input type="text"/>

Part B – Please use a separate sheet for each representation

Name or Organisation: **Monks Orchard Residents' Association (MORA)**

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

SP1.0A - Growth in homes, jobs and services that constitutes sustainable development following a brownfield land first approach, will be welcomed, provided growth is directed to places with good concentrations of existing infrastructure or areas where there is capacity to grow with further infrastructure and following the good growth principles. Across the borough growth will be accommodated as follows:

Targets for growth up to 2039

a) A minimum of 41,580 homes will be delivered (2019-2039) to address future demographic and economic needs. Of these, 6410 homes (**641 dpa**) will be delivered on small sites (below 0.25ha) and at least 20,790 homes by March 2029.

Assessment:

The dwellings per annum rate of delivery of **41,580** homes over the period **2019 to 2039**. This is a build rate of **2079 dpa**. To reach this total of **41,580**, it is also required to meet a target of **6,410 dwellings** to be delivered on small sites by **March 2029** i.e., over **10 years**. Therefore, if the **6,410 dwellings** are built at a build rate of **641dpa, as stated** and not at a build rate of **2079 dpa** as stated at **para a)**. the target of **41,580** won't be met in **2039 (20 years)**.

SP1.0A - Targets for growth up to 2039

- a) A minimum of **41,580 homes** will be delivered (2019-2039) to address future demographic and economic needs. Of these, **6,410 homes** (641 dpa) will be delivered on small sites (below 0.25ha) and at least **20,790 homes** by March **2029**.

The Targets for the period **2019 - 2039** for the “Places/Transformation area” listed in **Table 3.1** for the **16(*) “Places”** do **NOT** agree with the **41,580** in para a).

(*) **Table 3.1** has **17 Places**, **NOT 16!**

Table 3.1 totals **37,121** i.e., **NOT 41,580**.

Table 3.1 Housing targets for the 16 Places of Croydon

Place/Transformation area	Homes to be delivered 2019-2039
Addington	568
Addiscombe	647
Broad Green & Selhurst	587
Coulsdon	2160
Croydon Opportunity Area*	14,500
Crystal Palace & Upper Norwood	382
Kenley and Old Coulsdon	725
Norbury	225
Purley	5735
Purley Way Transformation Area	7515
Sanderstead	885
Selsdon	633
Shirley	278
South Croydon	474
South Norwood & Woodside	331
Thornton Heath	1063
Waddon	413

Place	Target	% of Total	Target SP1.0A para a)	Small Sites 2019-39	Small Sites 2019-29	Affordable Total 40% Target	Affordable Small Sites 40% Target	SP1.0A Para b) Opportunity Area
1 Addington	568	1.53%	538	98	10	227	39	8
2 Addiscombe	647	1.74%	613	112	11	259	45	11
3 Broad Green & Selhurst	587	1.58%	556	101	10	235	41	9
4 Coulsdon	2,160	5.82%	2046	373	37	864	149	119
5 Croydon Opportunity Area *	14,500	39.06%	13738	2504	250	5800	1002	14500
6 Crystal Palace & Upper Norwood	382	1.03%	362	66	7	153	26	4
7 Kenley & Old Coulsdon	725	1.95%	687	125	13	290	50	13
8 Norbury	225	0.61%	213	39	4	90	16	1
9 Purley	5,735	15.45%	5434	990	99	2294	396	839
10 Purley Way Transformation Area	7,515	20.24%	7120	1298	130	3006	519	1441
11 Sanderstead	885	2.38%	838	153	15	354	61	20
12 Selsdon	633	1.71%	600	109	11	253	44	10
13 Shirley	278	0.75%	263	48	5	111	19	2
14 South Croydon	474	1.28%	449	82	8	190	33	6
15 South Norwood & Woodside	331	0.89%	314	57	6	132	23	3
16 Thornton Heath	1,063	2.86%	1007	184	18	425	73	29
17 Waddon	413	1.11%	391	71	7	165	29	4
Total	37,121	100.00%	35,170	6,410	641	14,848	2,564	20,670
			41,580					

(*) Is the Croydon Opportunity Area a “Place” as throughout the document it refers to **16 “Places”** of Croydon but **Table 3.1** lists **17 Places!**

The Excel Table above attempts to determine the probable distribution across the “Places” based on the percentages or the totals given in **Table 3.1** in relation to the stated Policy **SP1.0A**. However, there are obvious differences which cannot easily be reconciled by the information provided in the **Revised Local Plan Policy SP1.0A at Para a) and Table 3.1**.

Policy	20yrs	18yrs	17yrs	10 yrs	per yr
SP1.0A Target	41,580	37,422	35,343	20,790	2,079
SP1.0A a)	6,410	5,769	5,449	3,205	321
SP1.0A b)	14,500	13,050	12,325	7,250	725
SP1.0A c) 40% of Total	16,632	14,969	14,137	8,316	832
SP2.2	37,736	33,962	32,076	18,868	1,887
Table 3.1	37,121	33,409	31,553	18,561	1,856

This Table attempts to summarise the Targets by Policy over time.

SP1.0A - The parameters for the “Places” are vague: (See FOI request Ref: 4250621 registered 5th Jan 2022 from Shirley Planning Forum (SPF)).

- a) The “Places” have no defined boundaries
- b) The “Places” have no defined Areas in hectares or sq.km.
- c) There is no quantitative data for “Places” regarding (Dwellings) Units/ha.
- d) There is no quantitative data for “Places” regarding Population Density (People/ha).
- e) The “Places” do not align with Ward boundaries or Ward reporting statistics.
- f) It is therefore not possible to monitor outturn to meeting the “Place” Targets accurately as it is not known whether the borderline dwellings are in a specified “Place” as the boundaries don’t relate to Ward boundaries.
- g) All the applications on the ‘Public Register’ are related to the ‘**Ward**’ and NOT the “**Place**”.

The response to the FOI request Ref: 4250621 on 31st January 2022

“Shirley Place as defined in the Local Plan has an area of approximately 770 hectares and comprises Shirley North and South wards and therefore the completions for Shirley Place can be calculated by adding the completion figures together for each ward. This is shown in the summary table (attached). Information regarding the total number of demolitions in each ward is not held centrally”.

Shirley North				
	2018	2019	2020	2021 (partial)
Gross units	48	94	73	16
Net units	45	87	69	12
Shirley South				
	2018	2019	2020	2021 (partial)
Gross units	12	17	3	5
Net units	10	15	0	5
Shirley Place				
	2018	2019	2020	2021 (partial)
Gross units	60	111	76	21
Net units	55	102	69	17

The Council does not hold the information we requested in a reportable format.

The Council does not know the exact Area in hectares of any “Place”

The Council does not hold the Number of Dwellings per “Place”.

The Council does not hold the Number of Persons per “Place”

The Summary spreadsheet provided a list of completions and a summary table for Shirley North and South wards from 2018 – 2020. The completions figure for 2021 is only available up until and including 31 August 2021.

The analysis of this limited information supports our assumption that the completions are recorded but that no action is taken as a result of those completions.

Analysis of the recorded data shows over the three full years 2018 to 2020 the Net Increase in Dwellings for Shirley “Place” = Shirley North + Shirley South = **226**

This is averaging **75.33** per year, so over 20 years = **1507 dwellings**. (Exceeding the Target by **1,229**). **The Target for the Shirley Place at Table 3.1 indicates 278.**

From the FOI Request, the Area of the Shirley “Place” is ≈770ha. The total Area of Shirley North & South Wards is 715.2ha (GLA figures) therefore, there is a 54.8ha excess of land in other adjacent Wards which numerically means the Target for Shirley Wards of 278 should be reduced by 7.12% = 258 (and the difference added to the Targets of the relevant adjacent Wards).

So, there is therefore 54.8ha of development land attributed to Shirley which is actually in other wards! This distorts Shirley outturns.

The acknowledged differences confirms the Monitoring of the Targets is not being managed and the calculations for targets are most unprofessional.

Targets and Outturns:

Monitoring Outturns of the “Places” (evidence).

The Targets for Croydon are Set by the GLA to meet Housing need, and the distribution across the Places of Croydon are Set by Croydon LPA to meet **the Local Housing Need**.

The Policy **SP1.0A Lists** these Targets but does **NOT** indicate how the ‘**outturns**’ should be **monitored** or what procedures should apply if the **outturns deviate from the set targets**.

If the Targets are **NOT** monitored, it is **NOT POSSIBLE** to establish whether Housing “Need” is still deficient or has been met. If Housing need has been met it removes the pressure for **Increased Density especially in areas of Focussed or Moderate Intensification**.

The Excel **Table** (above) shows the yearly outcome of Croydon localities for the **6,410** Target allocation based upon the **percentage** of the total of the sum of **Table 3.1** allocation for the “**Places**”. For the **Shirley “Place”** this should be **≈48** in-fill and redevelopments (within a **% tolerance**) **contribution** to meet the overall Target of **6410** over **20 years**.

Additionally, Table 3.1 shows the Target for new dwellings for the **Shirley “Place”** over **20 years** (2019 to 2039) to be **278** which is **13.9 ≈ 14** per year.

The **FOI** response indicates the current rate of redevelopment would give an outturn of **≈1,507** additional dwellings, **exceeding the Target over 20 yrs. to 2039 by 1,229**. This is a **442%** increase.

The **outturn** for the **Monks Orchard Residents’ Association (MORA) Area** over the **3 yrs** since **2019** is averaging at **43 dpa**, and the **MORA** area is a very **small** portion of ‘**Shirley**’ or the ‘**Shirley Place**’, as shown in the Table below (We don’t know the Area of the Shirley “Place”).

TARGET OUTTURNS (Estimates)							
Locality	Area (ha)	Dwellings	Population	Percentage of Shirley (Place?)	Units over 20 yrs (Estimate)	Per Year	Actual (Outturn/yr)
Shirley North Ward	327.90	6555	15666	45.85%	127	6	?
Shirley South Ward	387.30	5919	14147	54.15%	151	8	?
All Shirley (Shirley Place?)	715.20	12474	29814	100.00%	278	14	?
MORA AREA	178.26	3884	9283	24.92%	69	3	43
Shirley North Ward minus MORA	149.64	2671	6383	20.92%	58	3	?

The **MORA Area** (which we monitor) is only **24.92%** of **All Shirley**, but at a rate of **43dpa** over the **20yr** period, would exceed the **Target of 278** by **582 Dwellings for the Whole of the Shirley “Place”**. This is **200%** Increase for the Shirley “Place” when the **MORA Area** is only **23.14%** of the area of the **Shirley ‘Place’**.

MORA Area Re-developments				
Year	Existing Dwellings	New Dwellings	Overall Increase	Over 20 years
2019	6	54	48	
2020	5	28	23	
2021	10	68	58	
Total	21	150	129	
Average per year	7.00	50.00	43.00	860.00
Target Table 3.1 for Shirley "Place"			13.90	278.00
Excess			29.10	582.00

This Table shows **ample evidence** that the **Croydon LPA** are **NOT ‘Managing Developments’** to reflect the **Targets** across the **Borough** as required of their Job Title:

viz “**Development Management**” and the **Policies SP1.0A** as defined do not assist that objective.

Targets are to meet Housing Need so if Targets are exceeded, that satisfies Housing Need – then why allow any intensification in areas which have met Housing Need?

Further Supporting Analysis:

MORA is a **small part** of the **Shirley Place** and a **small part** of the **Shirley North Ward** but has had a significant proportion of the **Shirley “Place”** allocation since **2019**.

Local Area	Area (ha)	% of All Shirley
Shirley North Ward	327.90	45.85%
Shirley South Ward	387.30	54.15%
All Shirley	715.20	100.00%
MORA	178.26	24.92%
Shirley Place (approximate)	770.00	107.66%

This Table shows that the **MORA** area is **24.92%** of the total Area (ha) of the Shirley Wards at **715.2ha**.

Thus, the outturn for just the **MORA** area of **178.2ha** since **2019** is

129 dwellings averaging at **42 to 43 per year**. At the current rate, the outturn over **20yrs** would be **840 to 860** dwellings when the **Target** for the **whole** of the **Shirley “Place”** is just **278**. (table 3.1).

The LPA should appreciate the significance of this assessment.

Without some **Policy Definition** of a methodology to monitor Development proposals and approvals to report outturn against targets, this situation can escalate over the period of the Plan and unnecessarily completely change the character of an area and the targets set would have been totally irrelevant.

The current allocation of targets are an irrelevance if the outturn is not monitored by the Local Planning Authority (LPA) and appropriate action taken to meet the set targets if deviating from the projected outcomes.

Data supporting the Tables above are obtained from the GLA, ONS, Statista¹, etc.

This Method of Assessment could be appropriate for any of the Croydon “Places” or a locality in the Borough.

Compliance to NPPF:

NPPF Para 16. Plans should:

a) be prepared with the objective of contributing to the achievement of sustainable development²;

The Policy **SP1.0A** as proposed, does not meet **NPPF Para 16 a)** objective of contributing to the achievement of sustainable development as the Policy does **NOT** provide any adequate **monitoring of Growth Targets** across the Borough to ensure distribution of developments meet the required outcomes for the “**Places**” or to ensure a balance of **incremental “Growth” is distributed across the “Places” of Croydon**

¹ <https://www.statista.com/statistics/295551/average-household-size-in-the-uk/>

² This is a legal requirement of local planning authorities exercising their plan-making functions (section 39(2) of the Planning and Compulsory Purchase Act 2004)

in accordance with the Targets set by the Policy is maintained, with sustainable supporting infrastructure across the “**Places**” of Croydon..

b) be prepared positively, in a way that is aspirational but deliverable;

The Policy **SP1.0A** as proposed, does not meet **NPPF Para 16 b)** as the policy is **NOT** positively prepared in a way that is deliverable. Targets are set but the outcome of meeting the Targets from both Residents and Residents’ Associations perspective, is not monitored; Housing need could be exceeded or deficient and no account taken.

d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;

The Policy **SP1.0A** does not meet **NPPF Para 16 d)** as each application is determined individually and is unrelated to the contribution towards meeting or exceeding the Targets for the “**Place**” or a locality within the “**Place**”. The “**Place**” is **NOT** indicated in the Application Form or supporting documentation as there is **NO** defined boundary of the “**Places**”. Also, from our perspective, development proposals are not monitored on outcomes to meet the preferred targets as the **Public Register** only records the “**Ward**” of the application.

NPPF Compliance Chapter 3 Plan-Making

NPPF Examining plans

Para 35. Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are ‘sound’ if they are:

a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs³; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

Policy **SP1.0A** is **NOT positively prepared** as:

- 1 The Policy at **para a)** and **Table 3.1** indicate conflicting Targets, and,
- 2 The Policy does not meet the objectives of the strategy to **meet or monitor** the outcomes required of the Target policy for monitoring the outturn in order to meet the housing need stated targets within acceptable tolerances or the distribution of approved proposals appropriately across the “**Places**” of Croydon.

b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

Policy **SP1.0A** is **NOT justified** as it does **NOT** provide an appropriate strategy or methodology to ensure target outcomes are distributed appropriately across the “**Places**” of Croydon to meet housing need.

c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

³ Where this relates to housing, such needs should be assessed using a clear and justified method, as set out in paragraph 61 of this Framework.

Policy **SP1.0A** is **ineffective** in managing the outcomes across the borough. The actual Target is irrelevant to the applications coming forward from developers. The Determination of a proposal does not consider whether the proposal is within the Target parameters for the locality. Planning Committee Officers never question the contribution to meeting or exceeding a Target. There is no mechanism to consider the contribution to the Target of a “Place” during the determination. The objective is to provide additional homes irrespective of Targets or housing need. There is NO policy to refuse an application on grounds of excessive developments above the target or housing need for the locality.

d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

Policy **SP1.0A** is **NOT consistent with national policy** as the method of monitoring the development proposals to meet the targets within the individual **Site Capacities** and **Settings** to ensure “**Growth**” is managed appropriately to those **Targets**, as the parameter(s) and methodology for measuring outcomes is not defined and therefore is NOT consistent with delivery of **sustainable developments or meeting housing need**.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Recommendation:

The presentation inconsistency at paragraph **a)** and **Table 3.1** should be corrected or explained.

It is agreed that the distribution of the **GLA** Target for the Borough should be distributed proportionately across the “**Places**” of the Borough for proportionality of distribution to assist on gradual change **to meet housing “need”** and avoid a sudden change of character in a single locality.

Targets are set to ensure housing need is met. However, if the outcomes are **NOT** monitored and appropriate management procedures are not in place to correct divergence from the Targets over time then the Targets are ineffective and superfluous with respect to **housing need**.

If the Targets are NOT monitored, it is NOT POSSIBLE to establish whether Housing “Need” is still deficient or has been satisfied and met. If Housing need has been met it removes the pressure for Increased Density especially in areas of Focussed or Moderate Intensification.

In order to assess the progress toward meeting the Targets, a methodology of monitoring developments (dpa) across each “Place” is a necessity, and in order to facilitate this process, defined boundaries of each “**Place**” need to be identified.

Currently the “**Places**” of Croydon are abstract “**Areas**” without **specified boundaries** and therefore any development or redevelopment at the unknown edges of the “**Place**” could be in either of the adjacent “**Places**”.

The Public register does not record the location as a “**Place**” but within a “**Ward**” and therefore unless each “**Place**” boundary matches its nearest and most appropriate Ward(s) boundaries, its location within a “**Place**” is indeterminate.

There are **28** Wards and **17** “**Places**” so a “**Place**” can comprise more than one Ward.

It is suggested that “**Place**” boundaries follow nearest **Ward** or **Group of Wards**.

An example is the **Shirley “Place”** (FOI indicates ≈**770ha**) and Shirley (which is made up of Shirley North & South Wards = **715.2ha**) **Thus there is 54.8ha of development land attributed to Shirley which is actually in other wards!**

It is recommended that the “**Place Boundaries**” are **determined**, and it is suggested that the boundaries could follow the nearest ‘**Ward**’ Boundaries (or Group of Wards) in order to simplify a change to regularise the “**Place**” boundaries to Wards or an appropriate group of Wards.

We would then have a method of monitoring and reporting progress to meet Targets based upon “**Places**” (or Wards/group of Wards).

Without some method of monitoring to report outturn against targets, this situation can escalate and completely change the character of an area, with absolutely no ‘**Development Management**’ or control to meet a *fictitious housing need*.

Targets are to meet Housing Need so if Targets are exceeded, that satisfies Housing Need – then why allow any intensification in areas which have met Housing Need?

The current allocation of targets are an irrelevance if not monitored.

Development Management – have “*Managed*” to disregard the objective of setting Targets!

The remaining difficulty would then be how to influence the outcomes, if exceeding or underperforming to meet the **Policy targets**, as in-fill and redevelopments coming forward for approvals are not dependant on allocations but on a random and haphazard fashion.

However, it is a function of “Development Management” (their ‘Job description**’) to ‘manage’ this phenomenon in a satisfactory and professional manner and therefore should be assisted by **Policies to facilitate this activity**.**

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

