


## Representation Form for Croydon Local Plan Review

 www.croydon.gov.uk	<b>Local Plan</b> Publication Stage Representation Form	<b>Ref:</b>  <b>(For official use only)</b>
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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](mailto: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\*

2. Agent's Details (if  
applicable)

*\*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.*

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 (where relevant)	<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 **c)** Policy **SP1.0A** 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.

### Policy SP1.0A:

**c)** Ensure 40% (or 831 dpa) of all additional housing delivered is affordable to low-income groups during the life of the Plan

### Assessment:

#### SP1.0A para c)

The Total additional housing given in **SP1.0A para a)** is stated to be **41,580** whereas the total at **Table 3.1** is calculated as **37,121**.

**40%** of all additional housing as defined in **SP1.0A para c** is **40%** of **41,580 = 16,632** over **20 years** is **831 dpa**. Whereas **40%** of all additional housing as listed in **Table 3.1** Total of **37,121** is **14,848** and is a yearly rate of **742**.

### London Plan

#### London Plan Policy H4 - Delivering affordable housing States:

“A The strategic target is for **50 per cent** of all new homes delivered across London to be genuinely affordable. Specific measures to achieve this aim ...”

The Policy differs from that defined in the **London Plan H4** which calls for **50%** affordable Homes.

We believe **none** of the new builds, in-fill or redevelopments, over the last three years in the **MORA Area (Shirley North Ward)** have been **“affordable”** to low-income groups as none have been **10 Units** or greater.

This requirement for affordability is unlikely to be achieved as the in-fill and redevelopments are mainly all below the threshold of **10 dwellings** (below 0.25ha) and do not therefore attract a required percentage of affordable housing.

The Small Site Allocation totals **6,410 of which 40% would require 2,564 over 20 yrs.**

The Outturn for the **‘Shirley Place’** would require **40% of 278 = 111** over the plan period at **5.56** (≈6 per year).

The current outturn for the MORA Area of **129 dwellings** over **3 years** would have required **40% = 51.6 (≈52) or 17.2 (≈17) per year**, affordable homes when as far as we can determine all developments have been less than **10** units and therefore **NONE** have been affordable.

MORA Area Re-developments				
Year	Existing Dwellings	New Dwellings	Overall Increase	40% Affordable Target
2019	6	54	48	19
2020	5	28	23	9
2021	10	68	58	23
<b>Total</b>	<b>21</b>	<b>150</b>	<b>129</b>	<b>52</b>
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

**(There is confusion between SP1.0A a) and c) which requires clarification).**

**NPPF Compliance:**

**NPPF 16. Plans should:**

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

**Policy SP1.0A para c) is NOT deliverable** as the 40% of developments does not apply to development proposals <10 Units when most in-fill development proposals are <10 Units.

c) be shaped by early, proportionate, and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;

There has been **NO** early, proportionate, or effective engagement between plan-makers and community groups (Residents’ Associations) to agree this proportionate allocation of 40% affordable housing for development of <10 Units or the implementation of the policy in our locality.

## Examining plans

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 needs<sup>1</sup>; 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 para c) is NOT Positively Prepared** as the policy does not include a methodology to monitor the outturn for compliance to meeting the overall **Target of 40% affordable housing**.

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

**Policy SP1.0A para c) is NOT Justified** as it has no methodology to modify outturns if the targets are not being achieved.

- 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;

**Policy SP1.0A para c) is NOT effective** as there is no methodology to **manage** development proposals in order to meet the target for affordable housing.

- 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 para c) is NOT consistent with the London Plan Policy H4 - Delivering affordable housing.**

(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:

**Change the policy or introduce realistic monitoring of Targets for 'Affordable' Homes to include strategies to require developers meet the targets for provision of an appropriate percentage of affordable homes**

<sup>1</sup> 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.

**in relation and reference to the local 'Design Code'<sup>2</sup>, the 'Setting' and the available 'Site Capacity'.**

**Prevent Phasing of applications of a Site Capacity which could accommodate greater than 10 dwellings or judge the second phase as additions to the initial phase and calculate the 40% affordability over the total project.**

(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.**

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

**No**, I do not wish to participate in hearing session(s)

**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

**Please note** *the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

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<sup>2</sup> <https://www.gov.uk/government/publications/national-model-design-code>