

Representation Form for Croydon Local Plan Review

 www.croydon.gov.uk	Local Plan Publication Stage Representation Form	Ref: (For official use only)
---	---	---

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*

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 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 para e) To support the overall growth, sufficient new and enhanced infrastructure will be provided in sustainable locations.

Assessment:

There is no methodology to determine whether a proposed development would have adequate supporting infrastructure or whether the existing infrastructure would support a proposed 'intensification' and therefore whether the proposal is acceptable or unacceptable for the available or future supporting physical or services infrastructure.

It is not the **Housing Density** that requires supporting **Public Transport Accessibility** but the **occupants** of the proposed development and therefore the parameter for evaluation supporting **Public Transport Accessibility** is the **Residential Density in bedspaces/ha**.

This could be achieved by assessment of the available **Public Transport Accessibility (PTAL)** against the proposed developments **Residential Density**, assisted by the local "**Design Codes**"¹, the "**Setting**", the "**Site Capacity**" of the proposed development and the future planned "**Public Transport Accessibility**

¹ <https://www.gov.uk/government/publications/national-model-design-code>

Level” (PTAL) to assess whether the development meets sustainable existing or future planned infrastructure support.

The relationship between **Residential Density** (persons/ha) and **Public Transport Accessibility** requires correlation and assessment of data from **TfLs Connectivity Assessment Guide**² and the **Residential Density for The Setting** by assessment of the **National Model Design Code and Guidance**³.

The previous version of the London Plan provided some guidance by use of the TfL Density Matrix but that has been omitted from the revised London Plan in March 21. A debate is necessary to reconcile Residential Density in Bedspaces/ha at the various “Settings” with requirements for Public Transport Accessibility (PTAL).

Evidence of failure to comply:

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
Total	21	150	129	52
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

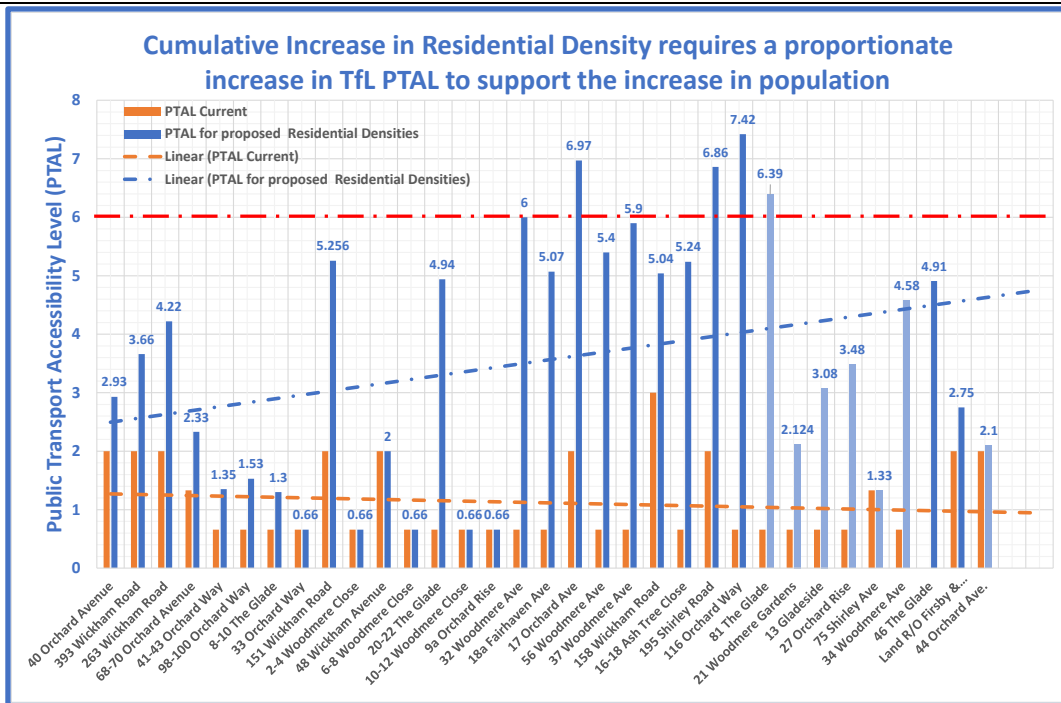
We have had significant redevelopment in just the **MORA Area** of the **Shirley North Ward** with **NO** proposed increase in **Public Transport Accessibility** and no prospect of improvement forecast over the life of the Local Plan. In fact, we have lost at least one GP Surgery recently, and no increased Public Transport Accessibility has been forthcoming, or likely up until at least 2031.

Design Code Summaries (Housing Densities Units/ha)						
Location	Area (ha)	Population	Dwellings (Units)	Residential Density (bs/ha)	Housing Density (Units/ha)	"Setting" for Design Code Density
Shirley North Ward	327.90	15666	6555	47.78	19.99	<Outer Suburban
Shirley South Ward	387.30	14147	5919	36.53	15.28	<Outer Suburban
All Shirley	715.20	29814	12474	41.69	17.44	<Outer Suburban
MORA Area	178.26	9283	3884	52.07	21.79	Outer Suburban
Post Code CR0 8S(*)	16.95	627	237	36.99	13.98	<Outer Suburban
Post Code CR0 8T(*)	11.82	644	246	54.48	20.81	Outer Suburban
Post Code CR0 7PL	1.73	47	19	27.17	10.98	<Outer Suburban
Post Code CR0 7QD	1.51	68	28	45.03	18.54	<Outer Suburban
Average	205.08	8787	3670	42.72	17.35	<Outer Suburban

The above Table provides an assessment of the Shirley Design Code “Settings” as defined by the National Model Design Code and Guidance³ published by the Department of Levelling Up, Housing and Communities, (January 2021 & July 2021) and referenced from para 129 of the NPPF.

² <https://content.tfl.gov.uk/connectivity-assessment-guide.pdf>

³ <https://www.gov.uk/government/publications/national-model-design-code>



MORA Developments over recent years for which the supporting Public Transport Accessibility (PTAL) has NOT been a factor in assessing its suitability for the Residential Density.
(as calculated by assessment of the TfL Density Matrix⁴)

NPPF Compliance:

16. Plans should:

a) be prepared with the objective of contributing to the achievement of sustainable development ⁵;

Sustainability of a development requires appropriate sustainable supporting infrastructure for developments and the Policy should specify how this is defined and achieved.

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

To be deliverable, the Policy requires a definition of assessment of the require supporting infrastructure.

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 effective engagement between the LPA and the Local Residents' Association on the definition of these Policies.

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

The Policy as provided is undefined and unclear and therefore it is NOT evident how a decision maker, or an applicant, should meet the Policy.

⁴ <https://content.tfl.gov.uk/connectivity-assessment-guide.pdf>

⁵ <https://www.gov.uk/guidance/national-planning-policy-framework/3-plan-making#footnote11>

- e) be accessible through the use of digital tools to assist public involvement and policy presentation; and

NPPF 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 areas objectively assessed needs²; 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;

The Policy is NOT **Positively prepared** as the Policy is undefined in terms of how it should be measured or how supporting infrastructure should be achieved for sustainable developments.

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

The Policy is NOT **Justified** as there are no parameters defined for assessment of justification.

- 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;

The Policy is NOT effective as there is NO methodology of assessment.

- 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.

The Policy is not consistent with National Planning Policy, as it does not refer to the **National Model Design Code(s) and Guidance**⁶ referenced from **NPPF para 129**.

(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.

⁶ <https://www.gov.uk/government/publications/national-model-design-code>

Recommendation:

Appropriate Policies are required to define the methodology to assess and define the necessary supporting infrastructure to support sustainable development:

- a) Development proposals Residential Density (bedspaces/ha) for available Infrastructure Services such as Public Transport Accessibility PTAL for the future occupants of the proposed Development.
- b) The physical supporting infrastructure (Utilities), e.g., available Gas & Water pressures, distance from nearest Fire Hydrant etc:
- c) Project Management procedures to ensure supporting infrastructure is provided within the period of a development.

(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:

Reasons to participate in the Hearing Session ■:

To assist debate on how to assess an appropriate supporting infrastructure such as Public Transport Accessibility (PTAL) for a development proposals Site Capacity at the local "Setting" for the proposals Residential Density (Bedspaces/ha),

██
██
██

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.