

## 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\*

*\*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 **SP2.2 b) & c)** Policy **SP2** 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 SP2 - Homes

#### Policy

~~SP2.2~~ In order to provide a choice of housing ~~for people in Croydon~~, the Council will seek to deliver a minimum of ~~32,800<sup>9</sup>~~ **37,736 (or 2,100 over 18 years)** homes between ~~2016 and 2036~~ **2019-2039**. This will be achieved by:

#### Assessment:

How does the "Minimum of **37,736 (or 2,100 over 18 years)** homes between 2019-2039. Relate to **Table 3.1**?

**37,736 over 18yrs = 2096.4 per year (not 2100).**

**37,736 over 20 years = 1886.8 per year over 18yrs = 33,962.4.**

**Table 3.1** allocation totals **37,121** over 20 yrs. = **1,856 per yr.**, therefore over 18 years at **1,856 per year = 33,409.**

#### Policy:

- b) The allocation of ~~6,970~~ **11,384** homes in the Croydon Local Plan's ~~Detailed Policies and Proposals~~ beyond the Croydon Opportunity Area;

## Assessment:

Analysis of the figures referenced can be illustrated as shown on the following excel table:

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

### Policy SP2

**SP2 Sub para b)** Table 3.1 indicates the Croydon Opportunity Area allocation is **14,500**. Therefore, the allocation *beyond* the Croydon Opportunity Area is **37,121 – 14,500 = 22,621**.

How does this relate to the following Policy Statements?

b) The allocation of ~~6,970~~ **11,384** homes in the Croydon Local Plan's Detailed Policies and Proposals beyond the Croydon Opportunity Area;

d) 10,060 **10,897** (. i.e.,  $641 \times 17$ , assuming adoption in 2023) homes being delivered across the borough on windfall sites; and

Sub Para d) It is understood that **641** per year over **17 yrs.** = **10,897**. However, SP1.0A a) states "Of the 41,580 homes delivered (2019 – 2039) i.e., 20 years, 6410 homes (641 dpa) will be delivered on small sites (below 0.25ha) and at least 20,790 homes by March 2029"

The **20,790** figure is the 10 year result of **41,580** homes over 20 years.

But **Table 3.1** totals **37,121** so **37,121** minus **6,410** = **30,711** over the places of Croydon would not be on small sites i.e., redevelopments or in-fills.

It is thought the figure of **6,410** is the allocation over **ALL Places** for small sites over **20 years** which is  $\approx 320$  (320.5) dpa **Dwellings per year** (NOT 641) as  $320.5 \times 17\text{yrs} = 5448.5$  NOT **10,897** (i.e.,  $641 \times 17$ ) homes being delivered across the borough on windfall sites.

**These figures do not reconcile and are therefore confusing.**

#### 16. Plans should:

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

The Targets should be reconcilable across the Local Plan to be monitored and achievable. They require clarification.

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

The Targets are ambiguous.

- f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).

The Targets conflict and cannot be achievable to meet the stated objective.

### 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 needs<sup>21</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;

The Policy is **NOT Positively prepared** as the targets are **NOT reconcilable** across the Policy definition.

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

The Policy is **Not Justified** as the targets conflict.

- 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 **ineffective** as the Targets conflict.

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 LPA needs to clarify the figures such that there is a clear understanding how they relate to the **“Places”** and **Table 3.1** with specific allocations, preferably in a tabular form as outlined below:

Unless we have misunderstood the figures, there needs to be correlation between the various statements in **Policy SP2.2** and **Table 3.1**.

The totals need to be confirmed and proportionate allocations distributed across the Borough for each category across **ALL “Places”**.

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

**Comparison Target Data across the “Places” of Croydon**

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

In addition, a method is required to monitor the outturns as development proposals coming forward are not necessarily following these Targets but are based upon availability of sites and developers’ allocation and availability of resources and land (redevelopment sites).

A method of regulating development distribution across the Borough is required otherwise the Targets are irrelevant. This is a function of “**Development Management**” (their Job description) to manage the outturn performance in a professional manner.

(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.