


## 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&lt;br/&gt;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="text"/>	No	<input type="text" value="✓"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="✓"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text"/>

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 DM1A.1 Amenity standards for residential developments**

(e) All flatted developments of 10 units should provide a minimum of 50 square metres of communal amenity space with a further 1 square metres per additional unit thereafter.

#### **Assessment:**

- This Policy requirement is for proposals of **10 units** and above. Therefore, Developments of **<10 Units** could have **Zero Communal Open Space** for all the Occupants. This seems rather unfair to the occupants of Flatted developments of **<10 units**, just because they live or rent a flat in a **<10 Unit development. It could be considered unacceptable on grounds of inequalities.**
- The Policy is also unrelated to the **Number of occupants** of a development when it is "**Occupants**" that require **Open Space – NOT UNITS**. What is the logic of defining community amenity space on the **number of Units** and **NOT** on the **number of occupants?** Therefore, the parameter for the provision of the requirement is wrong. It should be related to the **occupancy** of a development.

- The Policy assumes that occupants of Flats below **10 Units** do not require communal open space which is clearly an inequality issue. They still require a **Healthy and a wellbeing living environment** whether living in a development of **< or > 10 Units**.
- A **9-unit Flatted development** could accommodate around **30+ persons** (Bed Spaces) which **should** require **proportionately less Communal Open Space** **but certainly NOT zero**.

### 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;

**It is considered that the Policy DM1A.1 has NOT been positively prepared as it fails to address the inequalities resulting on its implementation.**

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

**There are no real grounds to justify the inequality of the Policy DM1A.1 for occupants of Flats in a development >10 Units.**

- 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;

**It is unreasonable and ineffective for future occupants of developments of <10 Units to be treated differently.**

(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:

It would be more appropriate to specify the amount of communal open amenity space for all Flatted Developments on the basis of **“Area per Occupant”** as it is **Occupants** that require and use **Communal Open Space - NOT UNITS** (Dwellings)!

The strategy of the Policy for **Communal Open Space** has been set as a precedent by the definition of Policy **DM1A.1 b) and d)**.

**(b)** Provides a minimum amount of outdoor space of **5m<sup>2</sup> per 1-2 person unit** and an extra **1m<sup>2</sup>** per extra **occupant** thereafter; and it must achieve a minimum depth and width of **1.5m**

**(d)** All flatted developments and major developments need to provide a minimum of **10m<sup>2</sup> per child** of new play space, calculated using **GLA's** the Mayor of London's population yield calculator

An amount per occupant would be an **equitable solution** for the **health and wellbeing of all flatted occupants**.

If children are entitled to **10sq.m. per child** play space, **irrespective of the number of flats**, this sets a precedent for the methodology of assessing the requirement for **communal open space** irrespective of the number of units. (See **DM1A.1 d)**.)

It is suggested that the provision should be based upon the number of occupants of a development and use an updated version of the **London Plan Table 3.1 "Minimum Space Standards"** to show the appropriate **"Communal Open Space"** in **sq.m.** for each configuration of number of **Bedrooms & Bed Spaces/Unit**.

(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.