


Representation Form for Croydon Local Plan Review

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

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 **a), b) & 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 checked="" 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 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.

b) The Croydon Opportunity Area will accommodate at least 14,500 new homes and 10,500 jobs up to 2039, supported by upgrades to the Brighton mainline and provision new/enhanced supporting infrastructure.

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

Assessment:

The allocation of **Targets** for Croydon seems out of proportion if compared with the **Land Area** of other **London Boroughs**.

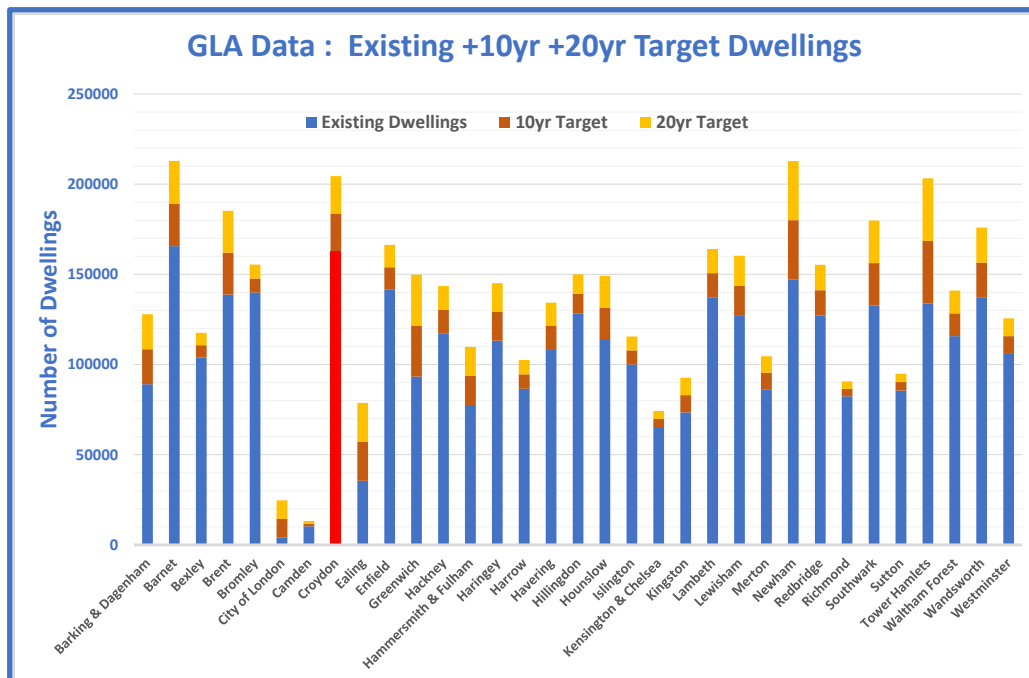
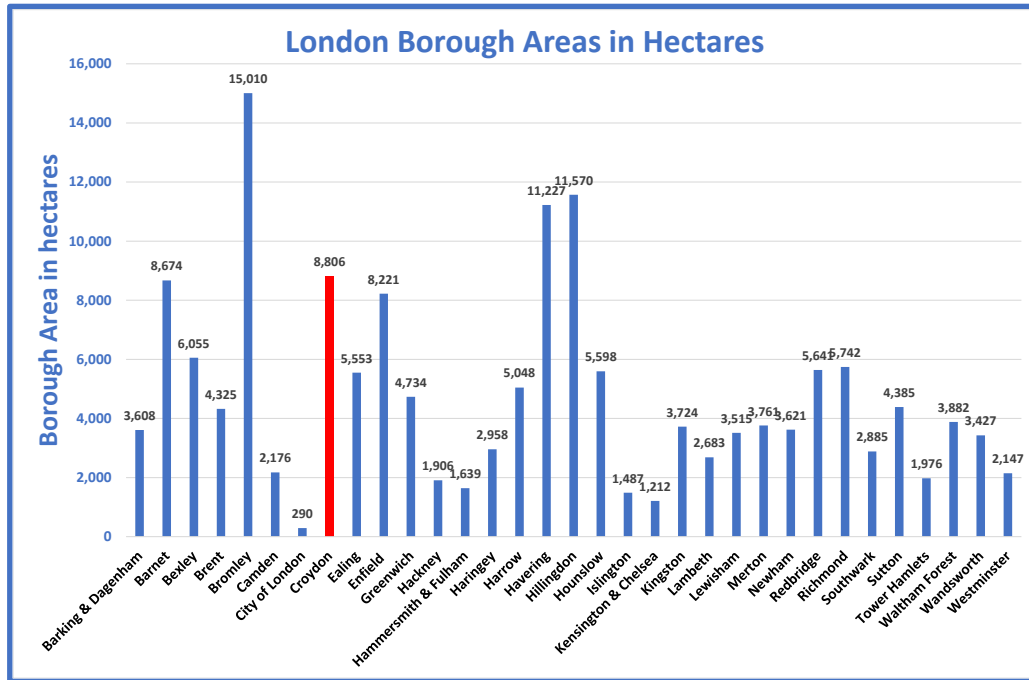
Croydon has an area of **8,806ha** compared to Bromley of **15,010ha which is a 70.45% difference, whereas** Croydon has approx. \approx 162,959 existing dwellings¹ increased by 41,580 to **204,539** and Bromley approx. \approx 139,973 existing dwellings¹ increased by 15,480 to **155,453**.

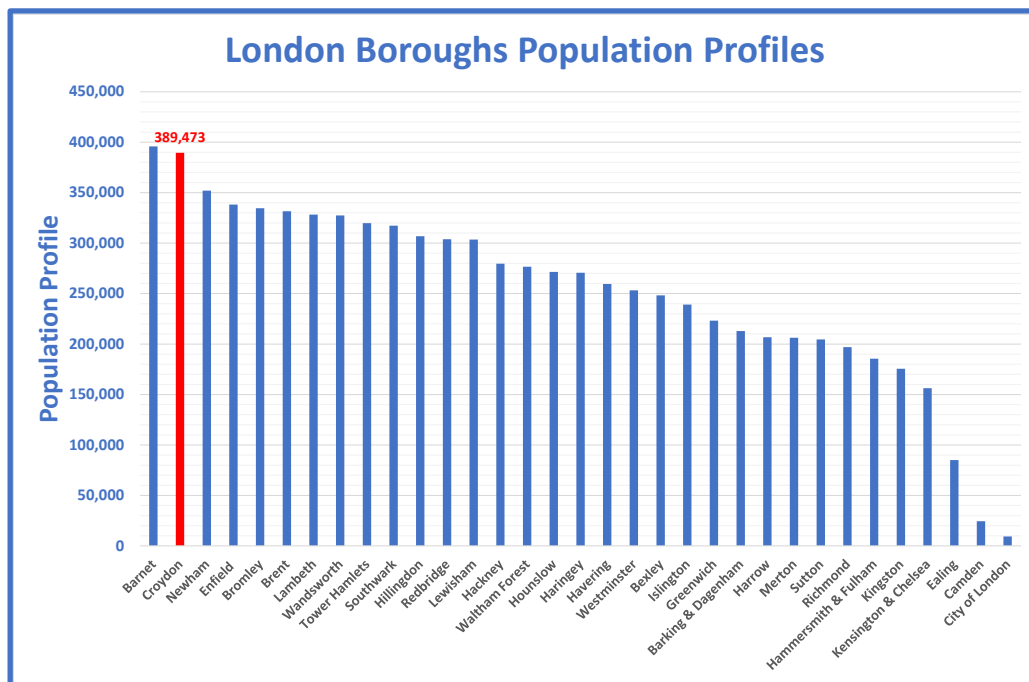
¹ Calculated from population data using:

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

This increase is a $(15,480/41,580) = 37.23\%$ difference between Croydon and Bromley and a $(41,580 - 15,480)/15,480 = 168.6\%$ increased Target for Croydon above that for Bromley.

The Croydon Target is also inappropriate as Croydon has the second highest population of all Boroughs in the GLA.





Compliance to 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 area's objectively assessed needs²¹; 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;

We are of the opinion that the Targets are not balanced fairly across the London Boroughs and Croydon has a higher than reasonable Target when compared to other Boroughs with larger expanse of Land and thus potential building areas.

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

We are of the opinion that this imbalance is NOT justified.

- 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 imbalance is NOT an effective target in meeting Housing need across the London Boroughs in a fair and equitable distribution. (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.

Renegotiate more reasonable Targets for Croydon for a more balanced distribution for Croydon’s target figure in relation to the Land mass and densities of the Croydon Borough compared to the Land mass and densities of other Boroughs.

(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 make the case for challenging the allocation of Targets and the unfair distribution across Boroughs to the detriment of Croydon, recognising the differences in Land Mass, and Population profiles across London Boroughs as detailed on the above graphical illustrations. To debate the Targets set across the “Places” of Croydon, defined by the Policy, such that Croydon LPA can actually “**Manage the Developments**” as required of their Job Description.

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.