

 www.croydon.gov.uk	Croydon Local Plan Review 2024 Publication Stage Representation Form	Ref:1 (For official use only)
Name of the Local Plan to which this representation relates:		Croydon Local Plan (Revised) May – June 2024 June – July 2024 1st July – 12th August 2024
Part A		
1. Personal Details*		2. Agent's Details (if applicable)
Title	I. Eng. M I E T.	
First Name	Derek	
Last Name	Ritson	
Job Title	Not Applicable	
(where relevant)		
Organisation	Monks Orchard Residents' Association	
(where relevant)		
Address Line 1		
Line 2	Shirley	
Line 3	Croydon	
Post Code		
E-mail Address	planning@mo-ra.co	

Part B – Please use a separate sheet for each representation

Representation #01

Name or Organisation: **Monks Orchard Residents' Association (MORA)**

3. To which part of the Local Plan does this representation relate?

Section	Introduction
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Policy	-	Paragraph	1.4	Table	-
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4. Do you consider the Local Plan meets NPPF (2023) para 35:

Please tick as appropriate	Yes	No
a) Positively Prepared		✓
b) Justified		✓
c) Effective		✓
d) Consistent with National Planning Policy		✓

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.

Comments:

Para 1.4 (page 11 June 2024 version) - Community involvement: Para 1.4 states:

"1.4 In preparing the Croydon Local Plan 2018 and this review the Council has worked with partners and interested parties to devise policies and proposals that it thinks will best address the needs of the borough up to 2036. As part of this process the Council has drawn upon an extensive evidence base referenced throughout this document and the comments made during consultation on drafts of the Plans. The Strategic Policies have been subject to four periods of consultation. It started out with an Issues and Options consultation in July 2009 followed by two consultations on

~~Preferred Option in February 2010 and September 2010, which led to their adoption in April 2013 after independent examination. A Partial Review of the Strategic Policies has been subject to further consultation on Preferred and Alternative Options in November 2015. The Detailed Policies were subject to two periods of consultation, both on Preferred and Alternative Options, one in October 2012 and the next in November 2015. The November 2015 consultation also included all of the Detailed Proposals.~~ This review of the Croydon Local Plan 2018 has been undertaken since it was adopted in accordance with the Statement of Community Involvement and the Local Development Scheme.”

Assessment:

- We question whether this statement is actually true, and that ‘adequate Community Involvement’ has been engaged for this ‘Croydon Local Plan Review’.
- There have been two meetings/year with Residents’ Associations but there were no specific discussions on the actual proposed Planning Policies or the evolution of the Croydon Local Plan Policies at those meetings, other than estimated timescales.
- There has been no community involvement for the assessment of Local Character for the “Places” of Croydon by consultation or any other means.
- The National guidance for ‘Area Type’ settings and ‘Local Design Codes’ have been raised with the LPA at Director Level and Spatial Planning Team level, in the form of a request and subsequently raised as a Stage 1 Complaint by The Director – Planning (S2 Complaint - COM/00012671).
- We have raised issues of Policy “Primacy” in relation to National Policy Guidance with the Director of Planning since March 2023 requesting why the Croydon Local Plan is considered by Officers and the Planning Committee to have “Primacy” over more recent National Planning Guidance (**Request/Complaint Ref: COM/12671**) which has been escalated to **Stage 2** but the latest Response from Nick Hibberd – Corporate Director of Sustainable Communities, Regeneration & Economic Recovery (Wednesday 5th June 2024) has still not been satisfactorily answered or has resolved the issues raised as of the date and time of submitting this representation.
- The Council Website has not been regularly updated over the period to inform stakeholders of progress (or lack of progress) in the production of the Development Plan Documents (DPDs).

Examining Plans : NPPF Para 35

- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the areas objectively assessed needs¹⁹; 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 believe that the statement at para 1.4 does not reflect the actual level of Community Consultation and Involvement suggested, as required in NPPF para 39, 63, 134 & 137.

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

We believe the statement 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;

We do not believe the statement effectively expresses the actual adequacy of Community Involvement or engagement provided or undertaken by the Local Planning Authority, since the adoption of the Croydon Local Plan (2018).

and,

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.

We are of the view that the community engagement offered by Croydon Local Planning Authority for the Revised Croydon Local Plan 2024, has not reflected that required of National Policy as directed by the NPPF (2023) paragraphs 39, 63, 134 or 137.

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:

No Comment

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.