

 www.croydon.gov.uk	<b>Croydon Local Plan Review</b>  <b>2024</b>  <b>Publication Stage</b> <b>Representation Form</b>	Ref:  (For official use only)
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<b>Name of the Local Plan to which this representation relates:</b>	<b>Croydon Local Plan (Revised)</b> <del>May – June 2024</del> <del>June – July 2024</del> <b>1<sup>st</sup> July – 12<sup>th</sup> August 2024</b>
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**Part A**

1. Personal Details*		2. Agent's Details (if applicable)	
Title	<b>I. Eng. M I E T.</b>		
First Name	<b>Derek</b>		
Last Name	<b>Ritson</b>		
Job Title (where relevant)	Not Applicable		
Organisation (where relevant)	<b>Monks Orchard Residents' Association</b>		
Address Line 1	[REDACTED]		
Line 2	<b>Shirley</b>		
Line 3	<b>Croydon</b>		
Post Code	[REDACTED]		
E-mail Address	<a href="mailto:planning@mo-ra.co">planning@mo-ra.co</a>		

## Part B – Please use a separate sheet for each representation

### Representation #02

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

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

<b>Section</b>	<b>Introduction</b>
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<b>Policy</b>	-	<b>Paragraph</b>	-	<b>Table</b>	<b>1.1</b>
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4. Do you consider the Local Plan meets NPPF 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.

**Table 1.1 (page 12 June 2024 Version) Croydon's Planning Policy Framework**

**The table omits references to National Guidance :**

- **The NPPF (2023); and**
- **The National Model Design Code & Guidance (2021).**

**These are relevant recent National Guidance which the Croydon LPA seem to be intentionally or unintentionally disregarding.**

**Examining Plans : NPPF Para 35**

- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the areas objectively assessed needs<sup>19</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;

**Editorial correction required, but the LPA should be recognising the concepts and recommendations of these recent National Guidance Policies.**

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

**We believe it is not Justifiable to omit these reference documents as they are National Authoritative Guidance and referenced from the NPPF (2023) at Para 134.**

- 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; and,

**No comment**

- 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 contend that the Revised Croydon Plan (2024) is missing significant appropriate National Guidance and Policy requirements published by Government over the period 2019 to 2023.**

**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.