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|  www.croydon.gov.uk | Croydon Local Plan Review 2024 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) May – June 2024 June – July 2024 1st July – 12th August 2024 |
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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 | [REDACTED] | | |
| Line 2 | Shirley | | |
| Line 3 | Croydon | | |
| Post Code | [REDACTED] | | |
| E-mail Address | planning@mo-ra.co | | |

Part B – Please use a separate sheet for each representation

Representation #05

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

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

| | |
|----------------|------------------------------|
| Section | Quality and Standards |
|----------------|------------------------------|

| | | | | | |
|---------------|--------------|-------------------|-----------------|--------------|--|
| Policy | SP2.8 | Paragraphs | a) to f) | Table | |
|---------------|--------------|-------------------|-----------------|--------------|--|

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.

SP2.8 ~~The Council will seek~~ **All housing developments should be designed** to ensure that new homes in Croydon meet the needs of residents over a lifetime and contribute to sustainable communities with the borough. This will be achieved by:

- a) Requiring that all new homes achieve the minimum **design and space standards for different sized dwellings** set out in ~~the Mayor of London's Housing Supplementary Planning Guidance and National Technical~~

~~Standards (2015) or equivalent;~~ **table 3.1 of the London Plan.**

Comment: This Policy Should reference the **London Plan Policy D6 Housing quality and standards** which includes **Table 3.1** In addition, the Policy should also reference the **London the Plan Supplementary Planning Guidance, Housing Design Standards LPG (2023) - which includes Table A1.1 (Best Practice).**

- b) Ensuring that all new homes designed for ~~families~~ **future residents** meeting minimum design and amenity standards set out in the Croydon Local Plan's Detailed Policies and Proposals, **nationally prescribed space standards** and other relevant London Plan and National Technical Standards (2015) or equivalent.

Comment: The Policy Should specifically reference the **London Plan Policy D6 Housing quality and standards** which includes **Table 3.1**. In addition, should also reference **Housing Design Standards LPG (2023) - London Plan Supplementary Planning Guidance** which includes **Table A1.1 (Best Practice).**

- c) **Development(s) will need to demonstrate the design of both private and communally shared spaces contribute positively to resident's health and wellbeing, whilst offering places for activity, shared experiences, and retreat;**

This is an inappropriate policy statement without defining the methodology of how this requirement should be **demonstrably**, assessed and **measured** against a **specific criterion**.

The **Private & Communally** shared space allocation should be defined against the appropriate relationship to the **'Area Type'** setting and the **Residential Density** (number of **occupants**). The Policy as written is **too subjective** and can be subjectively interpreted differently by Officers and Applicants.

- d) **Ensure the design and layout will support independent living;**

This requirement is too subjective to be clearly assessed. There must be a definite requirement of layout and design to ensure this requirement is met, without which it is not possible to approve or reject. The criterion for Layout needs to be specified within any tolerances of deviations. **If the Policy is not defined within the Croydon Local Plan it should reference out to the Design Standards LPG (2023) - London Plan Supplementary Planning Guidance** which includes **Table A1.1 (Best Practice).**

- e) **Be designed to (a)? the highest quality; be functional, accessible, adaptable, sustainable, in compliance with all relevant standards and applied neutrally across all tenures and**

This requirement has no defined credible measurement to define acceptability or unacceptability. It is again, too subjective as a Policy requirement.

Any relevant Standard(s) need to be listed or referenced from the Local Plan to ensure compliance is related to the Local Plan Policy.

- f) **At least 10% of all new homes will be built to meet M4 (3) 'wheelchair user dwellings and the remainder should meet M4 (2) accessible and adaptable**

dwellings standards in line with **London Plan Policy D7**. In exceptional circumstances, site specific factors may be considered to assess whether meeting the above requirement is achievable within development.

What defines an exceptional circumstance? If it is unachievable, the Site capacity (Area) is inadequate at the 'Area Type' setting or for the 'Design Codes' of the locality for the proposal.

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 the Policy does not adequately reflect National Guidance and is therefore NOT positively prepared.

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

As the Policy does not adequately reflect National Guidance it 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 Policies are too subjective to interpretation; therefore, we are of the view that the policies are partially ineffective;

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

The Policies are Not consistent with National Policies.

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.