 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)
<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>
<b>Part A</b>		
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	
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## Part B – Please use a separate sheet for each representation

### Representation #07

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

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

<b>Section</b>	<b>Housing choice for Sustainable Communities</b>
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<b>Policy</b>	<b>DM1.2</b>	<b>Paragraph</b>		<b>Table</b>	<b>4.1</b>
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**4. Do you consider the Local Plan meets NPPF para 35:**

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

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.

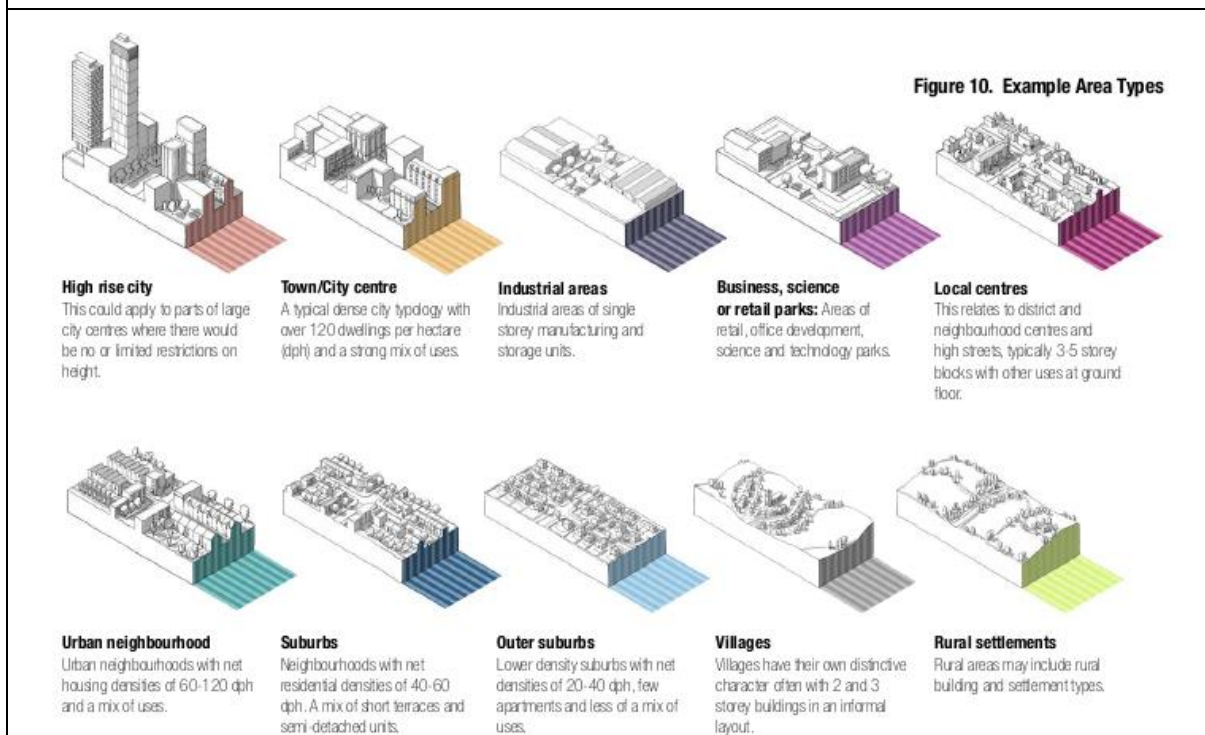
**DM1.2** ~~The Council will permit the redevelopment of the residential units where it does not result in the net loss of 3 bedroom homes (as originally built) or the loss of homes smaller than 130m<sup>2</sup>.~~ **To enable housing choice for sustainable communities, the minimum provision of homes designed with 3 or more bedrooms, must comply with Table 4.1 except where there is evidence from an associated affordable housing provider that 3 or more-bedroom dwellings are not required to address their priority needs.**

**Table 4.1 Only lists Suburban; Urban and Central Area Type settings.**

The **Table 4.1** is incomplete, as it is missing the **Area Type settings** as defined in the **National Model Design Code and Guidance Part 1 (2021)**<sup>1</sup>; which defines the following **Area Types**:

- **Rural (Croydon's Southern Wards or Places)**
- **Villages (Croydon's Southern Wards or Places)**
- **Outer Suburban: 20 to 40 Units/ha (Most of the Southern Wards or Places)**
- **Suburban: 40 to 60 Units/ha (Some of the Northern Wards or Places)**
- **Urban Neighbourhoods: 60 to 120 Units/ha (Northern Wards or Places)**
- **Local Centres (Various Places)**
- **Towns/City Centres: 120 Units/ha and above (probably within the Croydon Central Area Types).**

The **Area Type Categories** in the **Croydon Local Plan** are out-of-date. **NPPF (2023)** para 134 requires the **National Model Design Code & Guidance** be used to 'guide' development proposals in the absence of locally defined **Design Codes**.



**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;

**We believe the Policy is Not Positively prepared as the Policy does NOT adequately reflect the available National Guidance.**

<sup>1</sup> <https://www.gov.uk/government/publications/national-model-design-code>

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

**The Justification does take into consideration the reasonable alternatives offered by National Policies.**

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 Not effective for the Area Types excluded from the categories listed.**

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 offered do not embrace all possible Area Types as defined in the National Policies.<sup>2</sup> & <sup>3</sup>**

**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:

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<sup>2</sup> <https://www.gov.uk/government/publications/national-design-guide> (1 October 2019) revised (30 January 2021)

<sup>3</sup> <https://www.gov.uk/government/publications/national-model-design-code> (20 July 2021 updated 14 October 2021)

**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.