

 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 (where relevant)	Not Applicable		
Organisation (where relevant)	Monks Orchard Residents' Association		
Address Line 1	[REDACTED]		
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Part B – Please use a separate sheet for each representation

Representation #03

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

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

Section	The Places Of Croydon Growth in Croydon 2019 – 2040 Sustainable Growth and Protection of Character
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Policy	SP1.0C	Paragraph	-	Table	-
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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.

Sustainable Growth and Protection of Character

SP1.0C Developments will be supported that can achieve the following:

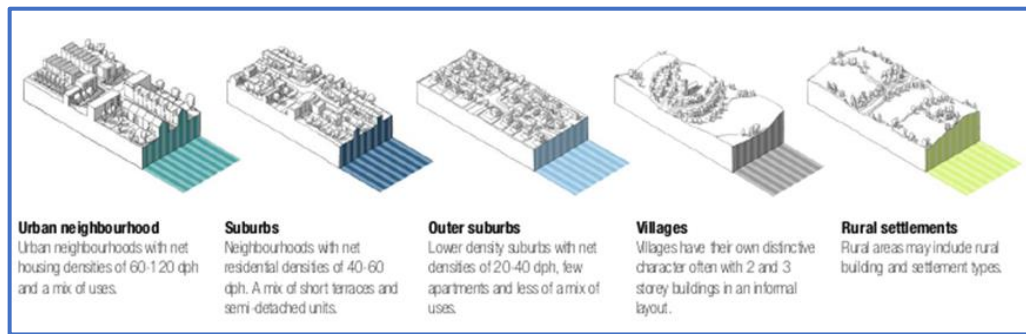
- a) Protect and enhance what is distinctive about Croydon and its Places collectively by securing a sense of belonging and high-quality design that sits well with its surroundings.
- b) Sustainable growth while protecting and enhancing the borough's natural environment and built heritage.
- c) An enhanced Green Grid with creating a biodiversity network contributing towards better health and well-being of the residents and help address climate change.
- d) A welcoming place that is designed inclusively to meet the needs of the residents and visitors.

Comments:

- Policy SP1.0C is the introduction to the Strategic Policy for “**Growth**” within and across the Borough including all “**16 Places**” of Croydon.
- These are all Strategic Objectives without any definition of how, or by how much, a development could achieve the requirement. In fact, as policy definitions or guidance, they are virtually meaningless.
- The Policies Map(s) do not indicate any areas considered suitable for Sustainable ‘**Growth**’ (or ‘Incremental Intensification’) to meet these objectives.
- There are limitations to where “Incremental Intensification” or “Growth” can be considered, as defined in the **London Plan Policy H2 Small sites: Para 4.2.4 which states:**
 - “Para 4.2.4 Incremental intensification of existing residential areas within PTALs 3-6 or within 800 metres distance of a station⁴⁷ or town centre boundary⁴⁸ is expected to play an important role in contributing towards the housing targets for small sites set out in Table 4.2.”
 - Thus, locations within an **Area Type** which has PTAL <3 and further than 800 metres from a Train/Tram Station or District Centre, would be inappropriate for any intensification. In such cases, development proposals in those **Area Types** should retain the existing ‘**Area Type**’ and ‘**Design Code**’ parameter values.
- There is also appropriate **National Guidance**¹ available (since 2021) which provides the appropriate guidance, but these **National Guidance** Policies are NOT quoted or referenced anywhere in this version of the revised Croydon Local Plan (2024).

¹ <https://www.gov.uk/government/publications/national-model-design-code> (2021)

- **The National Model Design Code & Guidance (2021)² sets out guidance for Density ranges for ‘Area Type’ Assessments:**



- **Management of Incremental intensification, for “Growth” within an ‘Area Type’ should respect the ‘Area Type’ parameters (maximum) Design Codes, for that ‘Area Type’ setting.**

Rural	<20 Units/ha
Outer Suburban	>20 Units/ha to ≤40 Units/ha
Suburban	>40 Units/ha to ≤60 Units/ha
Urban	>60 Units/ha to ≤120 Units/ha
Central	>120 Units/ha

- **If Croydon LPA do not agree with these National Guidance values for “Area Types” it would be helpful if the LPA provided reasonable alternatives, indicating why they do not agree with the National Guidance and what makes Croydon different.**
- **Housing Density (Units/ha) & Residential Density (Persons/ha) should be limited to the high threshold of the ‘Area Type’ of the location to ensure that the existing infrastructure can cope with the level of ‘Growth’ or ‘incremental intensification.’ This is a requirement of the NPPF 2023 – Chapter 9 for Sustainable Developments.**
- **Any development proposal which exceeds these limits should provide conclusive evidence to support the increase in densities and/or provide proposals to improve the supporting infrastructure, required of the higher ‘Area Type’ to ensure development sustainability.**

Site Capacity:

- **Additionally, any development proposal should ensure that all the requirements associated with a development proposal are accommodated within in the Site boundary and Site Capacity, in an acceptable configuration. This includes positioning of Car Parking & Bicycle parking facilities, refuse & Recycling Storage Bins, plus the Urban Greening Factor (UGF) allocation.**
- **There was, and is, no local guidance on local ‘Design Codes’ or ‘Area Type’ settings for Sustainable Growth and Protection of Character, for the “16 Places” of Croydon in this Croydon Local Plan (2024).**

² <https://www.gov.uk/government/publications/national-model-design-code>

- We have commented Further on Table 6.5 Interventions on each **Area Types** of character listed at pages 164 & 165 of the Plan.
- If the Inspector approves this Croydon Local Plan for adoption (Reg 19): There is no reference to the Character definitions by the **Design Led Approach (London Plan Policy D2)** or the **National Model Design Code & Guidance (2021)** with regard to ‘Area Type’ settings and **Design Codes** at the “Design and Character” (p152) or for the “**16 Places**” of Croydon (p318 DM34 to DM49 p433).
- Therefore, if the Inspector approves the Revised Croydon Plan as published for consultation without these guidance requirements within the plan or reference to the **National Guidance** as required by the **NPPF 2021/2023**, this Revised Croydon Local Plan (2024) will be up to 6 years out-of-date on publication.

Important References :

- 1 <https://www.gov.uk/government/publications/national-design-guide> (1 October 2019) revised (30 January 2021)
- 2 <https://www.gov.uk/government/publications/national-model-design-code> (20 July 2021 updated 14 October 2021)
- 3 <https://webarchive.nationalarchives.gov.uk/ukgwa/20230830172251/https://www.gov.uk/government/publications/national-planning-policy-framework--2> (Archived version 2021)
- 4 https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF_December_2023.pdf (2023)
- 5 https://assets.publishing.service.gov.uk/media/602cef1d8fa8f5038595091b/National_design_guide.pdf (Parts 1 & 2) (January 2021)
- 6 [Design code pilots, monitoring and evaluation \(publishing.service.gov.uk\)](https://assets.publishing.service.gov.uk/media/602cef1d8fa8f5038595091b/National_design_guide.pdf) (March 2022)

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 do not believe that the Policy as written is Positively Prepared. These Strategic Policies require further National Character definition and Guidance which has been evolving since 2019 and is also now required by the NPPF (2023 para 134) which clearly states: “These national documents should be used to guide decisions on applications in the absence of locally produced design guides or design codes.”

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

The Justification is clearly required in the Local Plan as it is currently deficient in the guidance as required from NPPF (2021) Para 129 or NPPF (2023) 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,

Without guidance the policies are meaningless and thus, not effective.

- 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.

Most Definitely NOT consistent with National Policy as the Croydon Local Plan totally disregards the National Policy on Character definition³.

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.

³ <https://www.gov.uk/government/publications/national-model-design-code>