

 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 #04

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

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

Section	Affordable Homes
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Policy	SP2.6	Paragraph	a) & b)	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.

SP2.6 (Page 38 & 39 June 2024 Version) Affordable housing should be delivered on site to support the development of mixed and inclusive communities. In exceptional circumstances:

- a) Where it is not practical to provide affordable housing on site, alternative provision may be accepted in the form of off-site affordable housing on a donor site. Any offsite affordable housing requirement will be calculated

(Comment 1) in relation to the total provision on the main site plus any donor sites. The donor site should be in an area with a similar land value to the main site (Comment 2) or otherwise provide a significant additional benefit in terms of the overall level or type of affordable housing.

Comment 1 - How would this be calculated? What is the formula to define the relationship? It is considered that Applicants' would need to be aware of the likely charges and how these charges are calculated, before submitting an application for a development proposal.

Comment 2 - How would this be calculated? Within what limits of Land Value. It is considered that Applicants' would need to be aware of the likely charges and how these charges are calculated, before submitting an application for a development proposal.

- (b) Where all options have been explored and it is not possible to provide the affordable housing onsite or on an alternative site, and evidence is provided to justify this, a commuted sum payment (Comment 3) towards the cost of providing additional affordable housing in the borough will be required instead.

Comment 3 - How would this be calculated? Within what limits of Land Value. It is considered that Applicants' would need to be aware of the likely charges and how these charges are calculated, before submitting an application for a development 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;

The Policy needs more specific definition of how to calculate the affordability.

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

Without definition of the methodology, the Policy is ill-defined and unworkable.

- 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,

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.

Probably not Consistent with National Policy or if the London Plan (2021) does not define the Methodology.

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.