

 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 #06

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

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

Reference:

Section **Housing choice for Sustainable Communities**

Policy	DM1.1	Paragraph	a) to g)	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.

Policy

~~DM1.1 The Council will seek to enable housing choice for sustainable communities by requiring the minimum provision of homes designed with 3 or more bedrooms on sites of 10 or more dwellings as shown in Table 4.1, except:~~
To maintain a supply of larger family homes to meet Croydon's housing need, the conversion of a larger home to smaller self-contained homes (Class C3) is only acceptable where:

- a. The gross original internal floor space of the existing dwelling is greater than 130m²;
- b. A family-sized unit of at least 130m² remains post-completion;
- c. The proposal meets minimum internal space standards, the provision of satisfactory levels of amenity space, privacy, daylight, parking and access, and adequate and convenient refuse storage and collection;
- d. The resulting units achieve internal configurations that are practical and fit for purpose, including vertical and horizontal stacking arrangements that minimise noise transfer between homes, including neighbouring homes;
- e. The design of any external alterations does not detract from the appearance of the property or the street scene and, wherever possible, retains a single door to the front elevation of dwellings in residential areas;
- f. The balance of hard and soft landscaping on the forecourt (including forecourts that are already substantially hard-surfaced) does not detract from the appearance of the property or the street scene; and
- g. The proposal provides for a mix of unit sizes in line with Table 4.1

~~a. Where there is agreement with the associated affordable housing provider that three or more bedroom dwellings are neither viable nor needed as part of the affordable housing element of any proposal, or;~~

~~b. Within three years of the adoption of this plan, where a viability assessment demonstrates that larger homes would not be viable, an element may be substituted by two bedroom, four person homes complying with the floor space specification of national Technical Standards or the London Mayor's Housing Supplementary Planning Guidance or equivalent.~~

Para c).

- **Should refer to the London Plan Policy appropriate to minimum internal space standards, and Housing Design Standards LPG which provides "Best Practice" guidance on Space Standards and Storage Space.**

- The Local Plan Should specify or refer out to London Plan “**Small Site Design Codes LPG** “**Rear Building Line Projection**” for the provision of satisfactory levels of amenity space, privacy, daylight, parking and access to adjacent dwellings.
- The policy should also specify or reference out to the Refuse and Recycling requirements and Bin Qualities appropriate for the number of occupants per unit, and location of external storage space to meet DM13 Refuse & Recycling Policies.
- A Development proposal’s **Site Capacity** should be adequate to accommodate all the requirements associated with the proposed development including all parking provision, refuse and recycling storage bins, cycle storage, appropriate for the **Area Type Residential Density**, and an allocation to meet the **Urban Greening factor (UGF)** in an acceptable configuration.

Para g.

- Para g and **Table 4.1** is incomplete. It only references “**Suburban**”, “**Urban**” and “**Central**” **Area Types**; whereas the **National Model Design Code & Guidance** ¹ lists “**Rural**” and “**Outer Suburban**” **Area Types** of which there are probably **Area Types** within the **Southern Wards of Croydon**.

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;

Not Positively Prepared, as the policy omits Area Types Rural and Outer Suburban as defined by the National Model Design Code & Guidance which would be within the Southern Wards of Croydon.

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

Not Justified as it omits Area Types from the Table 4.1 which would be area types in the Southern Wards of Croydon.

- 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;

Ineffective as the Policy omits Area Types that would be available in the Southern Wards of Croydon.

and

¹

https://assets.publishing.service.gov.uk/media/611152f98fa8f506ca458925/NMDC_Part_1_The_Coding_Process.pdf

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.

Not consistent with National Policy as defined in the national Model Design Code & Guidance.

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.