

 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]		
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Part B – Please use a separate sheet for each representation

Representation #08

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

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

Section	Housing Choice for Sustainable Communities
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Reference	20	Paragraph		Table	4.1
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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.

Reference 20 from Table 4.1

²⁰ Public Transport Accessibility Level – a rating of accessibility provided by Transport for London. A site with a lower PTAL than the surrounding sites and adjoining streets shall be considered at the higher PTAL.

Reference 20

²⁰ Public Transport Accessibility Level – a rating of accessibility provided by Transport for London. **A site with a lower PTAL than the surrounding sites and adjoining streets shall be considered at the higher PTAL.**

Why?

What is the logic for this reference.

Why should a location be considered to have better Public Transport Accessibility than actually assessed by the TfL WebCAT's authoritative assessment?

TfL are the authority for defining PTAL. The PTAL measures (Public Transport Access Level), based on how close it is to public transport and how frequent services are, in the area. The PTAL can be seen as a measure of the Density of the Public Transport Network.

To actually round up the PTAL to that of the next high category at an adjacent 100m² Cell, assumes a higher level of PTAL than is actually available at the site which is misrepresentation, distortion and falsification of Accessibility for future occupants.

This misrepresentation could assume all cell boundaries are wrong! It is also a distortion of the TfL assessment.

For what purpose is this falsification or distortion of this published data other than to ignore an area of limited accessibility to allow relaxation of provision of accessibility requirements for a development for future occupants – This is fundamentally a misrepresentation and an exaggeration of the actual available PTAL or Public Transport Accessibility at a site, and for what purpose? TfL are the defining authority NOT the LPA. **This would assume the Area Type Design Code for PTAL at the Locality is incorrect.**

The PTAL defines the accessibility at a cell. (i.e. each cell being 100m x 100m). if an adjacent PTAL is the next higher rating, it transpires that the whole boundary of that accessibility is rated higher than is actually available which completely undermines the TfL assessments and local PTAL configurations.

Actual PTALs					Misrepresentation of PTALs Ref: 21				
3	3	4	3	3	3	4	4	4	3
3	4	4	4	3	4	5	5	5	4
3	4	4	4	3	4	5	5	5	4
2	4	4	4	3	4	5	5	5	4
2	3	3	4	3	3	4	4	4	4
2	3	3	3	3	3	3	3	4	3

Illustration of misrepresentation & unacceptable manipulation of PTAL values over a Local Area by use of Reference 20.¹

¹ <https://content.tfl.gov.uk/connectivity-assessment-guide.pdf> (Section 2 Public Transport Access Level (PTAL)).

Reference 20 should be deleted as TfL are the authority for defining PTALs.

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 Reference 20 is appropriate for modifying the PTAL rating for Development proposal determinations.

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

We believe this modification of the local Public Transport Accessibility is unjustified and detrimental to the future occupants of an approved development proposal.

- 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;

We are NOT convinced that the Reference is appropriate or effective;

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.

We do NOT believe that the Reference is consistent with any National or Regional Planning Policy and is detrimental to future occupants of any approved determinations where this reference has influenced an approval decision.

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.