
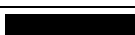
 www.croydon.gov.uk	<b>Croydon Local Plan Review</b>  <b>2024</b>  <b>Publication Stage</b> <b>Representation Form</b>	Ref:  (For official use only)
Name of the Local Plan to which this representation relates:		Croydon Local Plan (Revised) <del>May – June 2024</del> <del>June – July 2024</del> 1 <sup>st</sup> July – 12 <sup>th</sup> August 2024
<b>Part A</b>		
1. Personal Details*		2. Agent’s Details (if applicable)
Title	<b>I. Eng. M I E T.</b>	
First Name	<b>Derek</b>	
Last Name	<b>Ritson</b>	
Job Title <small>(where relevant)</small>	Not Applicable	
Organisation <small>(where relevant)</small>	<b>Monks Orchard Residents’ Association</b>	
Address Line 1		
Line 2	<b>Shirley</b>	
Line 3	<b>Croydon</b>	
Post Code		
E-mail Address	<a href="mailto:planning@mo-ra.co">planning@mo-ra.co</a>	

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

### Representation #09

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

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

<b>Section</b>	<b>Estate Renewal</b>
----------------	-----------------------

<b>Reference</b>	<b>DM1A</b>	<b>Paragraph</b>		<b>Table</b>	
------------------	-------------	------------------	--	--------------	--

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.

### Policy DM1A - Estate Renewal

DMX Subject to meeting the requirements of the London Plan, including a successful ballot or residents to explore opportunities for estate renewal, the Council will support estate renewal proposals which are:

- a. Appropriately master-planned to ensure the new site configuration makes the best use of public land, respects local character and delivers improved social and economic opportunities for residents of the estate as well as the local area;
- b. Opportunities to improve connections across the site and into neighbouring residential areas have been identified, including consideration of how the site can contribute to the borough's Green Grid;
- c. Demonstrate improvement to the standard of on-site community infrastructure

**In addition;**

The appropriate Master Plan should be based upon the concepts embodied in **The National Model Design Codes & Guidance (2021)**<sup>1</sup> which provides detailed guidance on the production of local **Design Codes**, guides and policies that lead to well-designed places. It provides advice to **Local Planning Authorities (LPAs)** on the process for producing 'Codes', the 'Design Parameters' and issues that need to be considered and tailored to their own context. It includes methods to capture and reflect the views of the **Local Community** throughout the process.

**Why does the Croydon Local Plan completely ignore the National Model Design Code & Guidance as required of the NPPF (2021) para 129, and the more recent NPPF (2023) para 134?**

**This document was endorsed by the Local Government Association (LGA) - Planning Advisory Service (PAS)**<sup>2</sup>.

#### **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;

**To be positively prepared, the Policy needs to take due account of the National Planning Policy guidance**

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

**Without considering the National Policy Guidance, the Policy is not justifiable.**

- 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 National Policy provides effective Guidance for the production of an appropriate Master Plan.**

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

<sup>2</sup> [Design code pilots, monitoring and evaluation \(publishing.service.gov.uk\)](https://publishing.service.gov.uk) (March 2022)

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 Policy would need to reflect the National Policy Guidance to be Consistent with National Policy.**

**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.