

 www.croydon.gov.uk	Croydon Local Plan Review 2024 Publication Stage Representation Form	Ref: (For official use only)
Name of the Local Plan to which this representation relates:		Croydon Local Plan (Revised) May – June 2024 June – July 2024 1 st July – 12 th August 2024
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	
<small>(where relevant)</small>		
Organisation	Monks Orchard Residents’ Association	
<small>(where relevant)</small>		
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Post Code		
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Part B – Please use a separate sheet for each representation

Representation #12

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

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

Section	Design and Character
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Policy	DM10	Paragraph	6.59 & 6.60	Table	6.5
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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.

Para 6.59

6.59 The level of growth depends on existing local character. The capacity for natural evolution is dependent upon the local character typology. The new development should not adversely impact on the predominant character. ~~The objective of the evolution of local character is to achieve an intensification of use without major impacts on local character.~~ Each character type has capacity for growth. Natural evolution is an ongoing process where development occurs in a way that positively responds to the local context and seeks to reinforce and enhance the existing predominant character.

Para 6.60

6.60 ~~Character in most areas of the borough will evolve over time through the recycling of existing plots with denser forms of development still within keeping of local character, the subdivision of larger properties, infill development and the development of the largest back gardens in the borough. Growth will be accommodated with~~ **Evolution in urban and suburban areas will be accommodated as shown in Table 6.5 which provides** guidance as to what development types are likely to be acceptable compared to the predominant character of a local area.

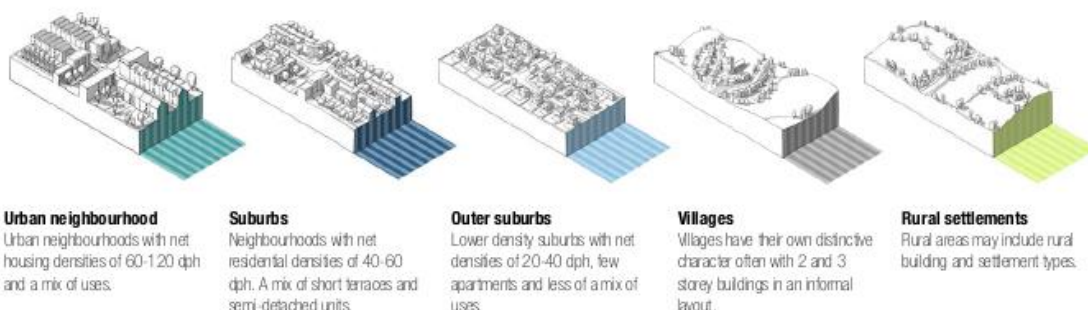
Table 6.5 Provides Categories for Local Character Types as follows;

- **Compact Houses on Relatively Small Plots – Define “Compact” & relatively “Small” Plots. (How are these assessed?)**
- **Detached Houses on Relatively Large Plots – Define “Relatively Large” Plots.**
- **Large Houses on Relatively Small Plots – “Define Large and Small”**
- **Local Authority Housing within Public Realm.**
- **Medium Rise Blocks With Associated Grounds – Define “Medium”**
- **Planned Estates of Semi-Detached Houses**
- **Scattered Houses on Large Plots – Define “Scattered”**
- **Terraced Houses on Large Plots – Define “Large”**
- **Terraced Houses and cottages.**

These terms are profoundly inadequately defined for acceptable ‘Guidance’ of what is actually required. The relationships are all subjective and completely ill defined.

- The **‘Area Types’** referenced in **para 6.60**, **‘Urban’** and **‘Suburban’** do not embrace all variants (**Rural, Outer Suburban**) and are not **defined**; they are **subjective** nomenclature with no parameter definitions or criteria and are **subjectively compared** to the assessed predominant character of a **local area**, which is also **undefined**.
- The **Table 6.5** provides the **LPA’s Policies** for **“Growth”** which are attributed to **Conversions, Additions, In-Fill, Rear Garden developments or Redevelopment** (i.e., demolition and replacement on a site).
- **None** of these **categories** are **adequately defined** as each category relationship is **unclear, vague, and indeterminate**. The Policy as written is therefore **meaningless**.
- The appropriate/inappropriate for a locality by a **Planning Officer** is subjective, and there is no guidance for comparison of assessment relationships to interpret the policy to any degree of **compliance**.
- The policies should provide the defined **numerical meaningful relationship boundaries** of each of the **Dwelling Types** parameters within each of the local **Area Types** as appropriate.
- The **Policy** should also provide sufficient guidance to ensure that appropriate **supporting infrastructure** would be available or planned within the plan period to meet the requirement of a proposed development.

- These are fundamental objectives of Planning Policy of ‘**Area Types**’ and ‘**Design Codes**’ for guidance, promulgated by government since **2019**¹ and further clarified in **2021**².
- These relationships require specified Ratios of parameters appropriate to the Locality.
- The **National Model Design Code & Guidance** provides definitions of **Area Types** are given at **NMDG Section 2B Coding Plan, Figure 10 “Example Area Types”**.



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** does 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.
- These are ‘Examples’ but **Croydon LPA** may consider other relationships, but at least they should indicate the criteria recommended and any reasons for their deviation from those recommended as guidance by the **National Model Design Guide**.
- An **Area Type Code** depends upon the **Housing Density** of a Locality and the **Area** under assessment. To calculate the **Residential Density** requires the Local occupancy, but if that is not known the **National Occupancy**³ (2023) can be used at **2.36persos/ha**. The parameter definitions could be for the whole of the **LPA Area**, Individual **Wards**, or to Smaller localities such as the **Local Post Code**. The smaller the **Area** (in hectares) the more accurate would be the **Area Type Definition**.
- These issues will be further commented on in our submission for the **Places of Croydon (DM34 p318 to DM49 p433)** in a subsequent representation submission.
- We have assessed the **Local Area Types** against the **National Model Design Code & Guidance**, and the assessment across the Borough are shown in the following table.
- There are likely small pockets of higher density, the smaller the Area, and for some central Post Code Areas.

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 [UK average household size 2023 | Statista](https://www-statista-com.translate.googl/UK+average+household+size+2023?_t=Zm91bnQ=&_tr=an&_sl=uk&_gl=us)

Location	Area (ha)	Population	Dwellings (Units) (Not Ave)	Residential Density (bs/ha) (Not Ave)	Housing Density (Units/ha)	"Setting" for Design Code Residential Density (bs/ha)	"Setting" for Design Code Housing Density (U/ha)	Occupancy Ratio (Not Ave) 2.36
Croydon	8,652.00	390,719	165,559	45.16	19.14	<Outer Suburban	<Outer Suburban	2.36
Ward								
Addiscombe East	148.40	11,460	4,856	77.22	32.72	Outer Suburban	Outer Suburban	2.36
Addiscombe West	137.50	16,212	6,869	117.91	49.96	Suburban	Suburban	2.36
Bensham Manor	144.60	16,932	7,175	117.10	49.62	Suburban	Suburban	2.36
Broad Green	217.20	20,221	8,568	93.10	39.45	Outer Suburban	Outer Suburban	2.36
Coulsdon Town	484.50	15,425	6,536	31.84	13.49	<Outer Suburban	<Outer Suburban	2.36
Crystal Palace & Upper Norwood	263.40	16,347	6,927	62.06	26.30	Outer Suburban	Outer Suburban	2.36
Fairfield	146.00	15,354	6,506	105.16	44.56	Suburban	Suburban	2.36
Kenley	552.50	10,984	4,654	19.88	8.42	<Outer Suburban	<Outer Suburban	2.36
New Addington North	136.50	10,946	4,638	80.19	33.98	Outer Suburban	Outer Suburban	2.36
New Addington South	254.90	11,322	4,797	44.42	18.82	<Outer Suburban	<Outer Suburban	2.36
Norbury Park	222.80	10,825	4,587	48.59	20.59	Outer Suburban	Outer Suburban	2.36
Norbury & Pollards Hill	130.80	12,133	5,141	92.76	39.31	Outer Suburban	Outer Suburban	2.36
Old Coulsdon	673.90	10,115	4,286	15.01	6.36	<Outer Suburban	<Outer Suburban	2.36
Park Hill & Whitgift	206.60	5,783	2,450	27.99	11.86	<Outer Suburban	<Outer Suburban	2.36
Purley Oaks & Riddlesdowne	270.30	9,713	4,116	35.93	15.23	<Outer Suburban	<Outer Suburban	2.36
Purley & Woodcote	461.70	15,190	6,436	32.90	13.94	<Outer Suburban	<Outer Suburban	2.36
Sanderstead	711.60	15,767	6,681	22.16	9.39	<Outer Suburban	<Outer Suburban	2.36
Selhurst	149.80	13,184	5,586	88.01	37.29	Outer Suburban	Outer Suburban	2.36
Selsdon & Addington Village	602.00	9,925	4,206	16.49	6.99	<Outer Suburban	<Outer Suburban	2.36
Selsdon Vale & Forestdale	526.90	10,017	4,244	19.01	8.06	<Outer Suburban	<Outer Suburban	2.36
Shirley North	328.00	15,406	6,528	46.97	19.90	<Outer Suburban	<Outer Suburban	2.36
Shirley South	384.40	10,619	4,500	27.62	11.71	<Outer Suburban	<Outer Suburban	2.36
South Croydon	384.40	18,053	7,650	46.96	19.90	<Outer Suburban	<Outer Suburban	2.36
South Norwood	197.80	16,438	6,965	83.10	35.21	Outer Suburban	Outer Suburban	2.36
Thornton Heath	171.70	18,008	7,631	104.88	44.44	Suburban	Suburban	2.36
Waddon	339.90	18,687	7,918	54.98	23.30	Outer Suburban	Outer Suburban	2.36
West Thornton	197.60	18,768	7,953	94.98	40.25	Suburban	Suburban	2.36
Woodside	215.30	16,881	7,153	78.41	33.22	Outer Suburban	Outer Suburban	2.36
Average	309.32	13,954	5,913	60.20	25.51	Outer Suburban	Outer Suburban	2.36

Note: Occupancy is based upon the UK National Occupancy rate for year 2023 at 2.36 person/unit ⁴ to provide guidance on Residential Densities (Persons/ha).

- For increased accuracy for our local Area of Monks Orchard Residents' Association (MORA), we have been assessing Area Types down to Post Code Areas: e.g.:

Location	Area (ha)	Population (Not Ave)	Dwellings (Units) (Not Ave)	Residential Density (bs/ha)	Housing Density (Units/ha)	"Setting" for Design Code Residential Density (bs/ha)	"Setting" for Design Code Housing Density (U/ha)	Occupancy Ratio (Not Ave) 2.36
Shirley North	328.00	15,406	6,528	46.97	19.90	<Outer Suburban	<Outer Suburban	2.36
Shirley South	384.40	10,619	4,500	27.62	11.71	<Outer Suburban	<Outer Suburban	2.36
All Shirley	712.40	26,025	11,028	36.53	15.48	<Outer Suburban	<Outer Suburban	2.36
MORA Area	178.26	9,166	3,884	51.42	21.79	Outer Suburban	Outer Suburban	2.36
Post Code CR0 8S(*)	16.95	627	237	36.99	13.98	<Outer Suburban	<Outer Suburban	2.65
Post Code CR0 8T(*)	11.82	644	246	54.48	20.81	Outer Suburban	Outer Suburban	2.62
Post Code CR0 7PL	1.73	47	19	27.17	10.98	<Outer Suburban	<Outer Suburban	2.47
Post Code CR0 7QD	1.51	68	28	45.03	18.54	<Outer Suburban	<Outer Suburban	2.43
Post Code CR0 7PB	1.26	40	25	31.75	19.84	<Outer Suburban	<Outer Suburban	1.60
Post Code CR0 8UB	1.70	71	30	41.89	17.70	<Outer Suburban	<Outer Suburban	2.37
Post Code CR0 7NA	1.97	36	18	18.27	9.14	<Outer Suburban	<Outer Suburban	2.00
Post Code CR0 7NE	0.83	26	11	31.33	13.25	<Outer Suburban	<Outer Suburban	2.36
Post Code CR0 7RL	1.40	60	24	42.72	17.09	<Outer Suburban	<Outer Suburban	2.50
Post Code CR0 7PX	0.96	21	11	21.81	11.43	<Outer Suburban	<Outer Suburban	1.91
Shirley Oaks Village ^{Note 2}	19.12	1,286	545	67.26	28.50	Outer Suburban	Outer Suburban	2.36
Shirley "Place" ^{Note 1} (EStimate)	770.00	32,995	13,981	42.85	18.16	<Outer Suburban	<Outer Suburban	2.36
Average	152.02	6,071	2,570	39.01	16.77	<Outer Suburban	<Outer Suburban	2.34

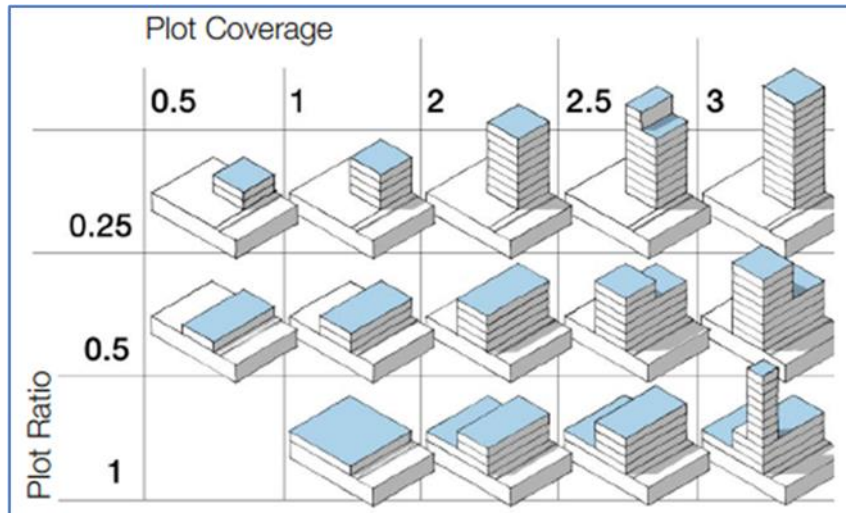
Note: All categories listed above should be specified using the appropriate ratios of the proposal compared with those of the Localities parameters.

Other parameters that determine Local Character are:

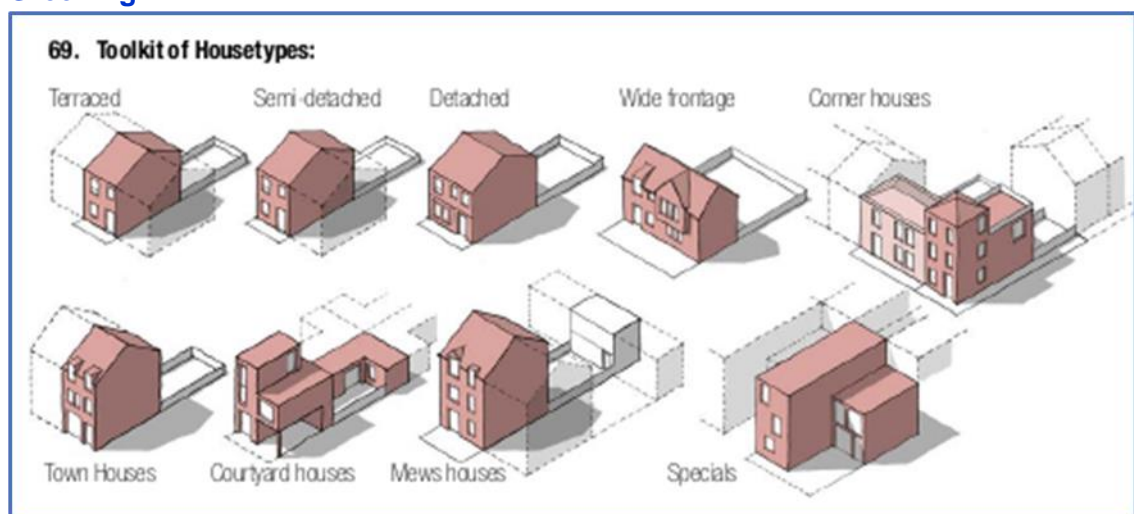
- The Floor Area Ratio (FAR) defined by $GIA \div Site Area$ appropriate for the Area Type setting range of a proposal;

⁴ <https://www.statista.com/statistics/295551/average-household-size-in-the-uk/>

- The **Plot Area Ratio (PAR)** defined by **Footprint ÷ Site Area** appropriate for the **Area Type** setting **range** of a proposal;
- For **multi-story** proposal, the comparison should relate the **Floor Area Ratio (GIA ÷ Site Area)** for the local area and that for the average of the **Area Type** setting range;



- Additionally, a housing development proposal must meet the **Residential Urban Greening Factor (UGF)** for the **Area Type** setting, **London Plan Policy G5 Urban Greening**.

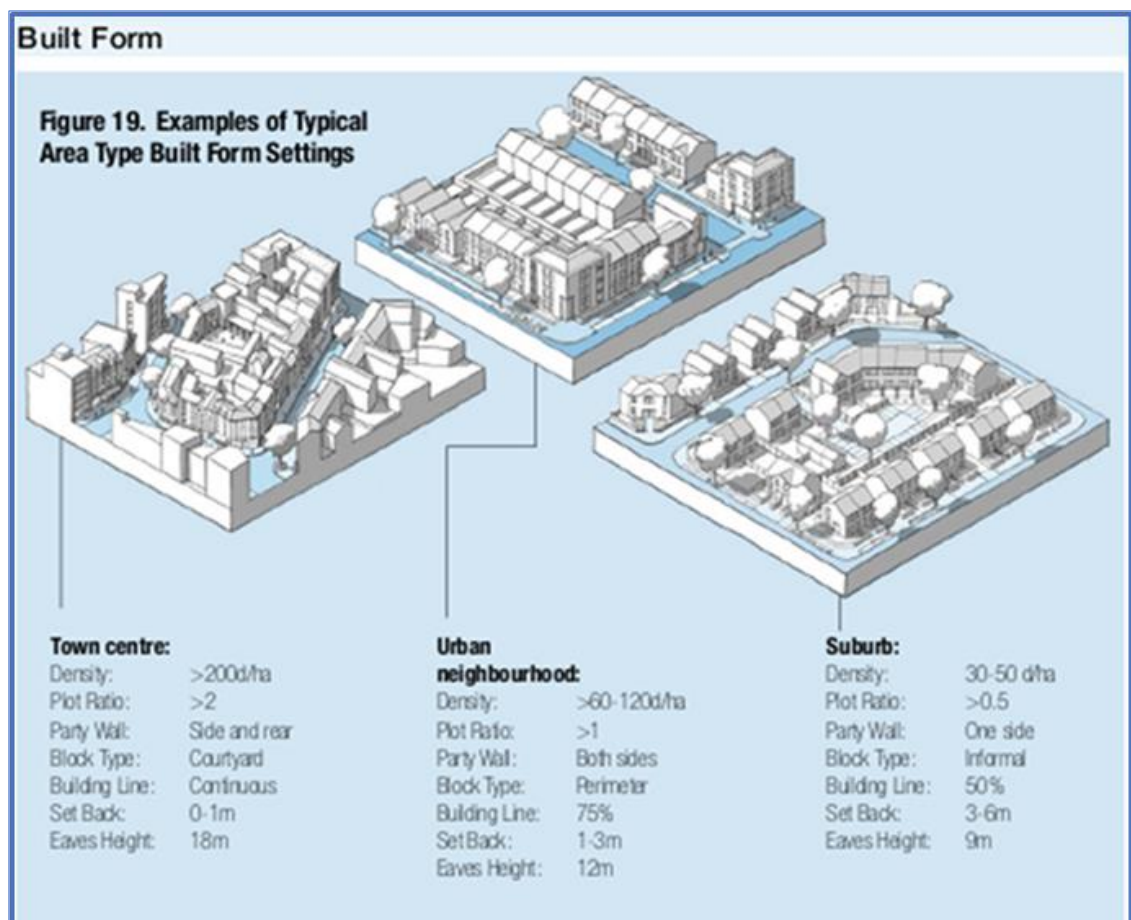


- The **Site Capacity** for a development should accommodate the footprint of the proposal and accommodate all appropriate requirements of proposal, in terms of parking, refuse storage, bike storage and amenity space appropriate for the Area Type setting Design Code.
- For recognising the support services, the relationship would be the ratio of Number of **Occupants/Site Area Unit** in relation the **Local Area** Type range in (**Occupants/Units**) i.e., **Residential Density** and the available **Public Transport Accessibility Level (PTAL)** of the **location cell**.

- The allowable **tolerance** on each parameter could be specified as a **numerical ±** allowance or a **±% of the parameter** being defined.
- These are all **defined more accurately** in the **National Model Design Code & Guidance**.⁵ and have been emerging since **2019** and updated in **2021**;

Therefore; why has all this guidance been completely disregarded by the **Croydon LPA** over the preceding 4 to 5 years?

- The **Housing Density (Units/ha)** and **Residential Density (Occupants/ha)** should be within the appropriate range for the **Area Type** setting of the proposal.



In January **2021**, the government proposed to test the application of the '**National Model Design Code**' (**NMDC**) concepts and its final Report was published in **March 2022**⁶. The **NMDC** 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. This document was endorsed by the **Local Government Association (LGA) - Planning Advisory Service (PAS)**.

⁵ <https://www.gov.uk/government/publications/national-model-design-code>

⁶ https://assets.publishing.service.gov.uk/media/62adf9a3d3bf7f0afd0f8c9f/NMDC_M_E_final_report_v5.pdf (Final Report March 2022).

We accept that **Croydon Council was not party to this programme**, however, we have **not** found any statement inferring that these **National Guidance documents** or the **NPPF** relevant to the **'Design Code' Guidance** is **only** applicable for those **Councils** participating in the **National Model Design Code (MNMDC) programme**. We interpret that the **NPPF is general guidance for all LPAs**. Therefore, **the issue is still valid**, and we have already started preparing and drafting our representation comments based upon the published **Revised Croydon Local Plan (2024)** presented to the **Full Council** in **April 2024** at **Item 8, Appendix 1a – 'Proposed Submission Draft of Croydon Local Plan'**, for representation during the forthcoming **consultation**.

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 the Policy is Positively prepared as the categories of growth are inadequately defined and do NOT provide sufficient Guidance to Applicants for their proposals.

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

We do not believe that the Policy as written is **Justified** as there are agreed alternative published guidance in **National Planning Policies** and as referenced from the **NPPF (2021 para 129)⁷ (2023 para 134)⁸**.

- 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 do not believe the Policy is Effective as we do not believe it is deliverable as written due to the vagueness which means the policy is indeterminate as adequate guidance; 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 does not reflect the historical and most recent **National Policy** as define in the **National Model Design Code & Guidance (2021)**, the **NPPF (2021 & (2023))** or the **London Plan Chapter 3 – Design**.

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

<https://webarchive.nationalarchives.gov.uk/ukgwa/20230830172251/https://www.gov.uk/government/publications/national-planning-policy-framework--2> (Archived version 2021)

⁸ https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF_December_2023.pdf (2023 version)

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.