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# Croydon Local Plan Review 2024

# Publication Stage Representation Form

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(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>

1st July - 12th 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		
(where relevant)	•		
Organisation	Monks Orchard Residents' Association		
(where relevant)	,		
Address Line 1			
Line 2	Shirley		
Line 3	Croydon		
Post Code			
E-mail Address	planning@mo-ra.co		

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

### Representation #14

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

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

Section	Design and Character				
Reference	-	Paragraph	Key Supporting Documents	Table	-

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.

#### **Key Supporting Documents (Page 159)**

- The Borough Character Appraisal
- Croydon Public Realm Design Guide (20129)
- Croydon's Conservation Area Appraisal Management Plans (various)
- Conservation Area General Guidance (2013)
- Croydon Opportunity Area Planning Framework (2013)
- East Croydon Masterplan (2011)
- Fair Field Masterplan (2013)
- Mid Croydon Masterplan (2012)
- West Croydon Masterplan (2011)
- Old Town Masterplan (2014)
- Croydon Local Heritage Area Review (2016)
- Historic England's Streets for All (2018)
- MHCLG's National Design Guide (2019)
- The Mayor of London's Characterisation and Growth Strategy (2023), London Plan Guidance
- The Mayor of London's Housing Design Standards (2023), London Plan Guidance
- The Mayor of London's Optimising Site Capacity: A design-led Approach, (2023), London Plan Guidance
- The Mayor of London's Small Site Design Codes, (2023), London Plan Guidance

#### The Key Supporting Document list should also include additional references:

- The National Model Design Code and Guidance (2021)
- BRE 209 and BS 17037 Compliant Daylight, Sunlight and Overshadowing Assessments.

#### **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 references have omitted important National Reference documents, such as in the list above.

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

Not Justified as these references should be provided.

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;

Ineffectively deliverable over the Plan period

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

Not 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.

	presentation is seeking participate in examinat			do you consider it	
✓	<b>No</b> , I do not wish to participate in hearing session(s)			<b>Yes</b> , 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:					

**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.