

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

### Representation #15

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

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

<b>Section</b>	<b>Ensuring a Safe and Effective Highway during development and construction</b>				
<b>Policy</b>	<b>DM28A</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.

**Comment:**

**Ensuring a Safe and Effective Highway during development and construction.**

The Policy does NOT include sufficient guidance on **Road highway configuration** and other requirements related to **Fire Safety for Back Land Developments**. (we are not sure if this is the right place for this comment).

- i) There is no defined requirement for developments to be within **100metres** of a **Fire Hydrant**.
- ii) There is no requirement for access to be provided which meet Building Regulations and **Fire Service guidance** Approved Document Part B Section 13 Vehicle Access at B13.1 requires:
  - Access for a pumping appliance should be provided to within **45m** of all points inside the dwellinghouse”.
  - That an access road or drive should have minimum width of **3.7m**.
  - Building Regulations and Fire Service guidance require the Approved Document Part B Section 13 Vehicle Access which states:
    - “B13.4 Dead-end access routes longer than **20m require turning facilities, as in Diagram 13.1**”.
  - That the entrance to an access Drive should allow emergency vehicle to enter within a Minimum width kerb to kerb – **3.7m** (Access driveway)
  - The width of gateways – 3.1m (Restricted Access)
  - The minimum turning circle between the access road which serves the access drive should have kerb to kerbs width of **5m** and allowing a **16.8m (Radius)** for fire tender access.
  - A Minimum turning circle between walls – **19.2m** (Radius)
  - A Minimum clearance height – **3.7m** over the whole route
  - To be Structurally sound to support a **14-tonne Fire Tender**.
  - A Fire Hydrant should be no further than **120 from a Dwelling House** and no nearer than **6 metres** to avoid falling masonry. And within **90m of a Fire Tender attending an incident**.

#### 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;

**Not Positively prepared as omitted important safety regulation checks.**

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

**Not Justified as these checks are important.**

- 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;

**Not 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

**Not Consistent with policy regulations**

**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:

**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.