

 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]		
Line 2	Shirley		
Line 3	Croydon		
Post Code	[REDACTED]		
E-mail Address	planning@mo-ra.co		

Part B – Please use a separate sheet for each representation

Representation #16

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

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

Section	The Places of Croydon
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Policies	DM34 to DM49	Paragraph		Table	
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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		✓

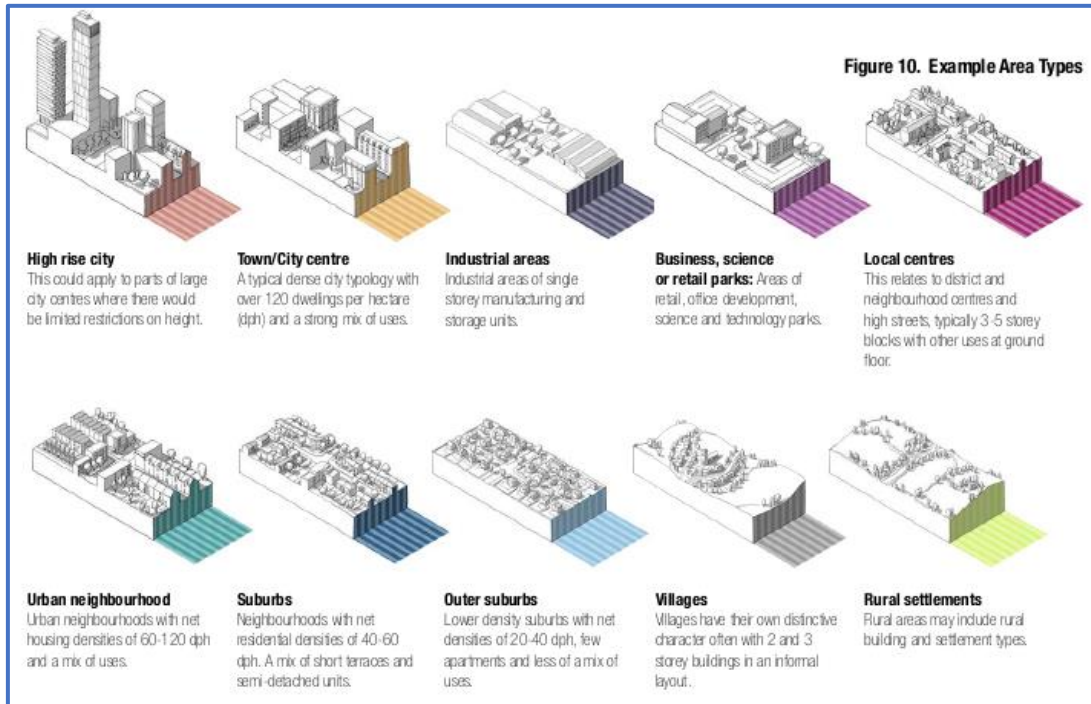
5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

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.

The **'16 Places of Croydon'** (page 300 onward) each require detailed description of Character to reflect the **Area Types** settings of the localities.

These **"Places"** provide an ideal opportunity to embrace the **National Model Design Code and Guidance¹** analysis to describe the various community groups, residential areas, District and Local Centres.

The **National Model Design codes & Guidance²** lists a number of **Area Types** examples:



Location	Area (ha)	Population	Dwellings (Units) (Dist Area)	Residential Density (bs/ha) (Dist Area)	Housing Density (Units/ha)	"Setting" for Design Code Residential Density (bs/ha)	"Setting" for Design Code Housing Density (U/ha)	Occupancy Ratio (Nat. Avg 2.94)
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
Broard 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

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

² <https://www.gov.uk/government/publications/national-model-design-code> (20 July 2021 updated 14 October 2021)

We have made an assessment of **Area Types** for Croydon LPA.

The parameters of these **Area Types** can assist in the definition of Character.

Area Types are more accurately defined over smaller areas (hectares), and we have researched our local Area to assist in our representations on individual proposals since 2021 based on assessment of **Post Code** parameters.

Location	Area (ha)	Population (Est. Ave)	Dwellings (Units) (Per Area)	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 (Est. 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

There are likely to be small pockets of higher density Areas in various locations, but these will only be identified if assessment is made at individual sites and the surrounding locality.

The fundamental requirement is to ensure that a proposal would be appropriate for the **Area Type** Setting and that the supporting infrastructure at an **Area Type** setting will support the proposed development or that there is a recognised program of infrastructure improvement planned to accommodate a proposal.

In January 2021, the government proposed to assess the application of the '**National Model Design Code**' (NMDC) concepts and its final Report was published in March 2022 ³. 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)**.

The objective of these emerging **National Planning Policies** for defining local character was an attempt to regain public confidence in the Planning Process such that Development proposals were of the "**Right Type**" and in the "**Right Place**" (NPPF para 8 a)).

All this information has been available since initial concepts published in 2019 and updated in 2021 so should definitely be reflected in the **Croydon Local Plan 2024**.

3

https://assets.publishing.service.gov.uk/media/62adf9a3d3bf7f0afd0f8c9f/NMDC_M_E_final_report_v5.pdf

None of this guidance has been used to define the **16 Places of Croydon** character definitions to assist developers/community Groups to ensure future developments reflect the **Area Types** and **Design Codes** of the destination locality.

We believe the omission of the well documented concepts of Design and Character Assessment is a significant omission from the Revised Croydon Local Plan from its adopted version in 2018 for the proposed adoption by 2025/26. If this version is approved by the Inspector for adoption, it will be approximately 6 years 'out-of-date' on adoption.

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;

The lack of consideration of the National Model Design Code and Guidance is a significant failure to adequately prepare the Croydon 2024 Local Plan.

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

To fail to consider the National Model Design Code & Guidance and other National Guidance in the review of the Croydon local Plan 2024 is not justified.

- 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 omission of the National Guidance shows ineffective delivery of the Croydon Local Plan 2024.

and

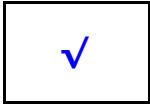
- d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant

The lack of any reference to or inclusion of and reference to the National Model Design Code & Guidance show complete inconsistency with National Policy and National Guidance.

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.