

Response of the Conservative Group of the London Borough of Croydon to the Regulation 19 Consultation – Proposed submission draft of the Croydon local plan 2019 to 2039.

We set out all areas that fail the Soundness test – Positively Prepared, Justified, Effective, Consistent with National Policy.

Incorrect Basis for this Consultation

This consultation is based on flawed assumptions. For example, SP1.0A states “Targets for growth up to 2039 a) A minimum of 41,580 homes will be delivered (2019-2039) to address future demographic and economic needs.”

Yet at SP2.2 it states “In order to provide a choice of housing for people in Croydon, the Council will seek to deliver a minimum of 37,736 (or 2,100 over 18 years) homes between 2019-2039.”

This shows a careless approach and a use of figures that are flawed and unsubstantiated. Since these figures were compiled the country has left the EU, there has been a pandemic, and working and living patterns have fundamentally altered. Notably, there is a net reduction in the population seeking to live in the wider London area, as many people are moving much farther away. Yet the figures, assumptions and projections in this consultation take no account of this and, indeed, far exceed the target set by government.

Unreasonableness

This consultation has been rushed out prior to a coming election in May 2022. Very little time has been given to the public to understand its implications. It is wholly unreasonable to expect the public to go through more than 800 pages of complex information in such a short amount of time: 6th January to 17th February 2022.

Furthermore, the London Borough of Croydon has had two Reports in the Public Interest issued against it. One declared the borough officially bankrupt, the other declared that a major public realm culture project more than doubled the allowed expenditure by tens of millions of pounds and, specifically, stated that the council does not keep proper records.

Therefore, this consultation should not have proceeded at this time.

Errors in the Consultation Document

We believe there are errors with the process of this consultation and there are errors in the consultation document. The following was sent to the Monitoring Officer of Croydon Council, to which a reply was received indicating non-agreement.

1. Serious errors in the document

The document <https://www.croydon.gov.uk/sites/default/files/2022-01/proposed-submission-of-croydon-local-plan-2019-to-2039-tracked-changes.pdf> is supposed to show all areas that have been changed from the previous approved Plan. These changes are shown by any deleted text being crossed out and new text shown in red.

There is at least one serious error in the document. The location of a proposed Travellers' site has been changed but is not shown crossed out and in red text. Nevertheless, local residents have spotted the error. The email trail shows that we have raised this with Planning. Their response is that this will be addressed as a "minor modification". Our concern is that this is not minor but in fact quite a fundamental change that should have been highlighted. It raises serious concerns that there are other similar errors in this very long document. The public cannot be expected to spot such glaring errors on their own. With such errors in place in the document, the consultation remains flawed.

We ask that the consultation be paused immediately and the deadline extended by six weeks so that the document can be thoroughly checked by the council, and then reissued for proper consultation. We also ask that you confirm whether it is legal for consultation to proceed with such fundamental errors in it.

2. Inaccessible to Disabled Residents

The council has been found to be non-compliant in providing documents to disabled residents in an accessible manner: <https://www.inyourarea.co.uk/news/study-claims-documents-on-croydon-council-website-are-inaccessible-to-disabled-residents/>

We ask that for this reason also the consultation be paused and documents be provided to the public in an accessible format. We also ask that you confirm whether it is legal for consultation to proceed with this accessibility issue unaddressed. It appears that a number of residents, including elderly and/or disabled residents, are precluded from responding to the consultation, and this could potentially lead to a legal challenge. My councillor colleagues and I have received much feedback from our residents about the requirement to respond to the consultation via a clunky council website form. It is very difficult for people to use.

3. Track record of Poor Record Keeping

We have just had a Report in the Public Interest issued by the independent external auditor, as you know. One of its key findings is that Croydon Council failed to keep proper records. Given this track record and the seriousness of this consultation, we think it would be prudent to pause the consultation in order to check that all information has been properly documented and records kept.

First set of flaws and examples of Unsoundness of the Local Plan

We start below with some examples of the flaws in the document and the unsoundness of the proposed local plan. We then continue with the same captured in tabular form.

Page 9 of the document, immediately after the “Map of the 16 Places of Croydon”, it states “A quick guide to which policies apply to which types of development – a new table will be produced on adoption”. This fails the Soundness test on the grounds of:

1. Not positively prepared; does not meet objectively assesses needs of Croydon. The lack of table constitutes a failure to present the needs of Croydon or information about Croydon in a manner that can be assessed to be objective or otherwise.
2. Not consistent with National Policy. National Planning Policy Framework requires plans to "contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals". This lack of table fails this requirement.

2.11 states "Demographically Croydon is a young borough and in 2011 a quarter of its residents were under the age of 20. Demographically, Croydon is a young borough and in 2019 just under a quarter of its residents were under the age of 17 (footnote 4). This fails the Soundness test on the grounds of:

1. Not consistent with National Policy. National Planning Policy Framework requires plans to "contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals". Footnote 4 missing, indicates sloppy preparation, and so fails this requirement.

SP1.0C states: "There are residential areas where the characteristics and infrastructure provision have led to the identification of potential for sustainable housing growth and renewal. a) Areas of Focused Intensification are areas where a step change of character to higher density forms of development around transport nodes and existing services will take place in locations where access to local transport and services is good. b) Moderate Intensification – are areas where density will be increased, whilst respecting existing character, in locations where access to local transport and services is good." This fails the Soundness test on the grounds of:

1. Not positively prepared:
 - a. Does not meet objectively assesses needs of Croydon. It is a subjective decision to choose this Focused and Moderate Intensification approach. Several other approaches are available, such as character based, as used in other boroughs. No proof has been provided that this approach meets Croydon's needs, nor that those needs have been objectively assessed.
 - b. Not informed by agreements with other authorities. No demonstration of agreement with other authorities, such as neighbouring Bromley or Sutton, has been provided in this document. Thus it fails this test of soundness.
 - c. Not Consistent with achieving sustainable development. This intensification is the very antithesis of sustainable development.
2. Not justified:
 - a. Taking into account the reasonable alternatives: none have been provided, hence this test of soundness has not been met.
 - b. Based on proportionate evidence: no information has been given on how this approach of intensification is proportionate, hence this test of soundness has not been met.
3. Not Effective:
 - a. Deliverable over the plan period: no information has been given on how this approach of intensification is deliverable over the plan period, hence this test of soundness has not been met.
 - b. Based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred: no information has been given on how this approach of intensification is based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, hence this test of soundness has not been met.
 - c. Able to be monitored: No information given on how this will be monitored, and this council has a poor monitoring track record, hence this test of soundness has not been met.

Table 3.1 gives figures that are not sound

1. Not positively prepared:
 - a. Does not meet objectively assesses needs of Croydon: both the number of “homes” (in reality these end up being mostly small flats) to be delivered and their distribution across the Places is arbitrary and unexplained. This cannot be seen to meet an objectively assessed need because no assessment has been demonstrated, let alone an objective one.
 - b. Not informed by agreements with other authorities. No demonstration of agreement with other authorities, such as neighbouring Bromley or Sutton, has been provided in this document. Thus it fails this test of soundness.
 - c. Not Consistent with achieving sustainable development. No explanation has been provided as to how this constitutes sustainable development. It cannot be said to have passed this soundness test.
2. Not justified:
 - a. Taking into account the reasonable alternatives: none have been provided, hence this test of soundness has not been met.
 - b. Based on proportionate evidence: no information has been given on how this number of “homes” (in reality these end up being mostly small flats) to be delivered and their distribution across the Places is proportionate, hence this test of soundness has not been met.
3. Not Effective:
 - a. Deliverable over the plan period: no information has been given on how this the number of “homes” (in reality these end up being mostly small flats) to be delivered and their distribution across the Places is deliverable over the plan period, hence this test of soundness has not been met.
 - b. Based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred: no information has been given on how this approach of the number of “homes” (in reality these end up being mostly small flats) to be delivered and their distribution across the Places is based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, hence this test of soundness has not been met.
 - c. Able to be monitored: No information given on how this will be monitored, and this council has a poor monitoring track record, hence this test of soundness has not been met.
4. Not Consistent with National Policy: National policy requires there to be a sound demonstration of how calculations have been made, that those calculations are still relevant (particularly following huge societal changes), that the distribution of new developments across a borough have sound criteria. None of this has been demonstrated, hence the Soundness test fails for this consultation document.

4.1 states “There is a need to increase the delivery of three bed (+) homes to cater for families, as well as a range of different sized housing”. This is at odds with the intensification approach. Already Croydon is converting thousands of homes into unsuitable, cramped flats. Therefore this fails the soundness test of:

1. Not Effective:
 - a. Deliverable over the plan period: At odds with the drive for intensification which has been and will be with more houses being converted into flats.

Continued set of flaws and examples of Unsoundness of the Local Plan – in Tabular Form

The following tables capture reasons that the stated paragraph fails the Soundness test.

	Soundness								
	Positively Prepared			Justified		Effective			Consistent with National Policy
Contentious paragraph in Proposed Local Plan	Meets objectively assessed needs of Croydon	Informed by agreements with other authorities	Consistent with achieving sustainable development	Taking into account the reasonable alternatives	Based on proportionate evidence	Deliverable over the plan period	Based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred	Able to be monitored	In accordance with the policies in this Framework and other statements of national planning policy
<p>SP2.1 In order to provide a choice of housing for people in socially-balanced and inclusive communities in Croydon, the Council will apply a presumption in favour of sustainable development of new homes provided applications for residential development to meet the future needs of the area requirements of Policy SP2, SP3.14 and other applicable policies of the development plan. Quantities and Locations</p> <p>SP2.2 In order to provide a choice of housing for people in Croydon, the Council will seek to deliver a minimum of 32,8909 37,736 (or 2,100 over 18 years) homes between 2016 and 2036 2019-2039."</p>	The need for delivering the stated number of homes (in reality small flats) is unproven and therefore not objectively assessed	No information given about eg agreements with Bromley, Sutton, Lewisham all of which have far lower targets	This arbitrary set of figures are achievable in a sustainable way, quite the opposite. The very use "intensification" deems it unsustainable, and this approach is largely unknown anywhere else.	No alternatives provided - even though need is for more 3+ bed houses	Evidence is neither proportionate nor proven	<p>Undeliverable because the figures are arbitrary, the intensification is unnecessary and does not meet its own stated need for 3+ bed houses.</p> <p>Also this council has track record of non-delivery, and 2 RIPIs which call into question its entire viability</p>	No info given on this	No info given on how this will be monitored	

	Soundness								
	Positively Prepared			Justified		Effective			Consistent with National Policy
Contentious paragraph in Proposed Local Plan	Meets objectively assessed needs of Croydon	Informed by agreements with other authorities	Consistent with achieving sustainable development	Taking into account the reasonable alternatives	Based on proportionate evidence	Deliverable over the plan period	Based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred	Able to be monitored	In accordance with the policies in this Framework and other statements of national planning policy
<p>Affordable Homes SP2.3 The Council will seek to ensure that a choice of homes are available in the borough that will contribute to addressing the borough's need for affordable homes,</p> <p>a) 25% of all new homes developed delivered in the borough over the plan period to be either affordable will be low cost rented homes</p> <p>borough's need; and</p> <p>b) 15% of all new homes in the borough developed delivered over the plan period to be will be intermediate affordable</p>	<p>These are arbitrary figures with no objective assessment provided</p>	<p>No information given about eg agreements with Bromley, Sutton, Lewisham all of which have far lower targets</p>	<p>No indication given of how this is to be achieved sustainably</p>	<p>No alternatives given</p>	<p>Evidence is neither proportionate nor proven</p>	<p>Undeliverable because the figures are arbitrary, the intensification is unnecessary and does not meet it own stated need for 3+ bed houses.</p> <p>Also this council has track record of non-delivery, and 2 RIPIs which call into question its entire viability</p>	<p>No info given on this</p>	<p>No info given on how this will be monitored</p>	

	Soundness								
	Positively Prepared			Justified		Effective			Consistent with National Policy
Contentious paragraph in Proposed Local Plan	Meets objectively assessed needs of Croydon	Informed by agreements with other authorities	Consistent with achieving sustainable development	Taking into account the reasonable alternatives	Based on proportionate evidence	Deliverable over the plan period	Based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred	Able to be monitored	In accordance with the policies in this Framework and other statements of national planning policy
<p>SP2.4 To deliver affordable housing in the borough, on sites of ten or more dwellings the Council will:</p> <p>a) Negotiate to achieve up to 50% affordable housing, subject to viability providing that;</p> <p>b) Seek a 60:40 ratio between affordable rented homes and intermediate (including starter) homes unless there is agreement between the 60:40 ratio is not viable¹⁰;</p> <p>c) Require a minimum provision of affordable housing as set out in SP2.5.</p> <p>Residential development should respond positively to the need for affordable homes that are genuinely affordable for local residents by.</p> <p>a) Providing at least (i) 35% of new housing as affordable on residential developments of 10 or more dwellings, exploring all possible options to achieve 50% affordable housing and (ii) 50% onsite affordable housing if publically owned land or land protected by Policy</p>					<p>These figures are not based on either objective or proportionate evidence but are rather political choices</p>				

	Soundness								
	Positively Prepared			Justified		Effective			Consistent with National Policy
	Meets objectively assessed needs of Croydon	Informed by agreements with other authorities	Consistent with achieving sustainable development	Taking into account the reasonable alternatives	Based on proportionate evidence	Deliverable over the plan period	Based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred	Able to be monitored	In accordance with the policies in this Framework and other statements of national planning policy
<p>SP2.5 In the following ...which will be independently tested, demonstrably designed to maximise affordable housing delivery, be able to demonstrate a planning benefit which outweighs the provision of affordable housing and will be subject to a late stage review (i.e. at the point of 75% of sales/tenancies). Developments proposing below a minimum of 20% affordable housing will not be supported; b) Where development proposes a higher level of affordable housing than 35%, a different tenure mix may be supported without the need for a viability assessment, where this is agreed with a Registered Provider; c) Where ...housing contributions for large purpose built shared living schemes will be in the form of a single upfront payment in line with London Plan Policy H16.</p>	As there is no sound basis given for these figures, they cannot be said to meet any objectively assessed needs of Croydon	No information provided about agreements with other authorities		No alternatives have been given	No sound basis is given for these figures	Track record of non delivery, hence fails to be effective	Nothing demonstrated on this	Poor monitoring track record and none given	

	Soundness								
	Positively Prepared			Justified		Effective			Consistent with National Policy
Contentious paragraph in Proposed Local Plan	Meets objectively assessed needs of Croydon	Informed by agreements with other authorities	Consistent with achieving sustainable development	Taking into account the reasonable alternatives	Based on proportionate evidence	Deliverable over the plan period	Based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred	Able to be monitored	In accordance with the policies in this Framework and other statements of national planning policy
Mix of Homes by Size SP2.7 The Council will seek to ensure that a choice of homes is available in the borough that will address the borough's need for homes of different sizes. For both market and affordable housing, this will be achieved by: a) Setting a strategic target for 30% of all new homes up to 2039 to have three or more bedrooms; and	No basis given for 30% We say it should be 60% as already too many flats and not enough homes – also need criteria for housing families, not rent each room	No information provided about agreements with other authorities		No alternatives have been given	No sound basis is given for these figures	Track record of non delivery, hence fails to be effective	Nothing demonstrated on this	Poor monitoring track record and none given	

	Soundness								
	Positively Prepared			Justified		Effective			Consistent with National Policy
Contentious paragraph in Proposed Local Plan	Meets objectively assessed needs of Croydon	Informed by agreements with other authorities	Consistent with achieving sustainable development	Taking into account the reasonable alternatives	Based on proportionate evidence	Deliverable over the plan period	Based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred	Able to be monitored	In accordance with the policies in this Framework and other statements of national planning policy
Quality and Standards SP2.8 e) Be designed to a the highest quality; be functional, accessible, adaptable, sustainable, in compliance with all relevant standards and applied neutrally across all tenures		No information provided about agreements with other authorities	Needs to include specific and stringent standard of high quality materials and in keeping with character of area and majority local view support	No alternatives have been given	No sound basis is given for these figures	Track record of non delivery, hence fails to be effective	Nothing demonstrated on this	Poor monitoring track record and none given	

	Soundness								
	Positively Prepared			Justified		Effective			Consistent with National Policy
Contentious paragraph in Proposed Local Plan	Meets objectively assessed needs of Croydon	Informed by agreements with other authorities	Consistent with achieving sustainable development	Taking into account the reasonable alternatives	Based on proportionate evidence	Deliverable over the plan period	Based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred	Able to be monitored	In accordance with the policies in this Framework and other statements of national planning policy
<p>Quantities and Locations 4.2</p> <p>There is a need for over 41,580 42,930 new homes in Croydon by 2039 2036 and evidence indicates that approximately 40%half of these need to be larger homes¹³</p>	<p>Unsubstantiated figures</p> <p>See earlier comments at beginning of document about changed national needs – post Brexit, post pandemic, move away from London, reduced immigration</p>	<p>No information provided about agreements with other authorities</p>	<p>Community-led must include specific measures for demonstrating that existing residents approve</p>	<p>No alternatives have been given</p>	<p>No sound basis is given for these figures</p>	<p>Track record of non delivery, hence fails to be effective</p>	<p>Nothing demonstrated on this</p>	<p>Poor monitoring track record and none given</p>	

	Soundness								
	Positively Prepared			Justified		Effective			Consistent with National Policy
Contentious paragraph in Proposed Local Plan	Meets objectively assessed needs of Croydon	Informed by agreements with other authorities	Consistent with achieving sustainable development	Taking into account the reasonable alternatives	Based on proportionate evidence	Deliverable over the plan period	Based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred	Able to be monitored	In accordance with the policies in this Framework and other statements of national planning policy
Mix of Homes by Size 4.10 Analysis of the Strategic Housing Market Assessment suggests that approximately 50% 40% of homes should have three or more bedrooms. Unfortunately, analysis suggests that to meet this demand on the sites likely to come forward for development is impractical. Nevertheless a doubling of the outturn for family houses achieved since 2011 is a realistic target.	Strategic Housing Market Assessment is flawed and discredited.	No information provided about agreements with other authorities	Already too many flats. Need 60% houses	No alternatives have been given	No sound basis is given for these figures	Track record of non delivery, hence fails to be effective	Nothing demonstrated on this	Poor monitoring track record and none given	

	Soundness								
	Positively Prepared			Justified		Effective			Consistent with National Policy
Contentious paragraph in Proposed Local Plan	Meets objectively assessed needs of Croydon	Informed by agreements with other authorities	Consistent with achieving sustainable development	Taking into account the reasonable alternatives	Based on proportionate evidence	Deliverable over the plan period	Based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred	Able to be monitored	In accordance with the policies in this Framework and other statements of national planning policy
4.11a Flatted development will need to incorporate innovative design solutions both inside and out so that living and private amenity spaces meet the needs of families with children. The layout and design of these spaces will need to be inherently flexible and be usable child play, family activities and needs of multiple age groups.		No information provided about agreements with other authorities	Much flatted development already not pleasurable and spacious. Therefore this document is asking for more flats to be built, rendering the basis of the consultation questionable, if not void	No alternatives have been given	No sound basis is given for these figures	Track record of non delivery, hence fails to be effective. There is no current enforcement of standards, so no reasonable expectation of this in future.	Nothing demonstrated on this	Poor monitoring track record and none given	

	Soundness								
	Positively Prepared			Justified		Effective			Consistent with National Policy
Contentious paragraph in Proposed Local Plan	Meets objectively assessed needs of Croydon	Informed by agreements with other authorities	Consistent with achieving sustainable development	Taking into account the reasonable alternatives	Based on proportionate evidence	Deliverable over the plan period	Based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred	Able to be monitored	In accordance with the policies in this Framework and other statements of national planning policy
<p>4.21a</p> <p>There has been a steady decline in the number of new homes being delivered designed with 3 or more bedrooms, from over 25% in the 2012/13 monitoring period to approximately 11% in the 2018/19 monitoring period. The recent delivery of many 1 and 2-bedroom homes, with uptake particularly strong from younger households, contrasts with the Strategic Housing Assessment's findings that 40% of new homes should be larger homes. To redress this imbalance in new supply there is a need for policy that both protects the existing supply of larger units, and promotes the delivery of more, new larger homes. This will help to future-proof the borough's housing market and is particularly relevant in suburban locations where larger homes are more common and delivery takes place on small sites.</p>	Conflicts with intensification drive	No information provided about agreements with other authorities	Conflicts with intensification drive	No alternatives have been given	No sound basis is given for these figures	Conflicts with intensification drive	Nothing demonstrated on this	Poor monitoring track record and none given	

	Soundness								
	Positively Prepared			Justified		Effective			Consistent with National Policy
Contentious paragraph in Proposed Local Plan	Meets objectively assessed needs of Croydon	Informed by agreements with other authorities	Consistent with achieving sustainable development	Taking into account the reasonable alternatives	Based on proportionate evidence	Deliverable over the plan period	Based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred	Able to be monitored	In accordance with the policies in this Framework and other statements of national planning policy
<p>4.46A Large-scale purpose-built shared living housing is generally understood to be a large scale purpose built managed rental block, comprising of functional private living units with extensive communal facilities, ...</p> <p>4.46B Large scale purpose built shared housing is a unique new form of development that seeks to address the demands of a niche subset of the housing market, so policies are related to HMO properties such as a lack of/poor quality shared ... concentration of large scale purpose built shared living and student accommodation.</p>		No information provided about agreements with other authorities	Policy needs to be bolstered to actively discourage poor HMOs on residential streets, and to remove existing ones as these new large scale developments can replace them	No alternatives have been given			Nothing demonstrated on this	Poor monitoring track record and none given	

	Soundness								
	Positively Prepared			Justified		Effective			Consistent with National Policy
Contentious paragraph in Proposed Local Plan	Meets objectively assessed needs of Croydon	Informed by agreements with other authorities	Consistent with achieving sustainable development	Taking into account the reasonable alternatives	Based on proportionate evidence	Deliverable over the plan period	Based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred	Able to be monitored	In accordance with the policies in this Framework and other statements of national planning policy
<p>DM2A.1 Development proposals for large-scale purpose-built shared living will be supported where they meet both the requirements of London Plan Policy H16 and the following additional Croydon -specific requirements:... scale purpose built shared living schemes and purpose built student housing within a 250m distance of each other and total capacity of schemes (using a ratio of 1.8 beds/per C3 unit)</p> <p>DM2A.3 Each private unit shall include or have exclusive access to the following; a) at least 20-30sqm range of functional living space separate from the communal facilities; b) A minimum of 5m2 of communal amenity space shall be provided per bed space/person incorporating a wide range of amenities to support a diverse and inclusive community of residents and to address their needs</p>		No information provided about agreements with other authorities	Inadequate – tantamount to overcrowding. Must include larger spaces, and new measures to remove existing overcrowding in flats	No alternatives have been given	No sound basis is given for these figures	Track record of non delivery, hence fails to be effective	Nothing demonstrated on this	Poor monitoring track record and none given	

	Soundness								
	Positively Prepared			Justified		Effective			Consistent with National Policy
Contentious paragraph in Proposed Local Plan	Meets objectively assessed needs of Croydon	Informed by agreements with other authorities	Consistent with achieving sustainable development	Taking into account the reasonable alternatives	Based on proportionate evidence	Deliverable over the plan period	Based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred	Able to be monitored	In accordance with the policies in this Framework and other statements of national planning policy
<p>SP3.3 The Council will promote. To support the Borough's function as a hub of culture and creativity, development supporting the growth and expansion of Cultural and Creative Industries to make Croydon a better place to live as a driver of growth and enterprise in the local economy will be supported. The focus for accommodating Cultural and Creative Industries will be the network of Enterprise Centres set out below:</p> <p>a) Croydon Metropolitan Centre; b) Purley District Centre; c) Crystal Palace District Centre; and d) South Norwood District Centre/Portland Road.</p> <p>SP3.4 The Council will support promote the remodelling of the Fairfield Halls as a performance facility.</p>	<p>Given recent Report in the Public Interest regarding culture and Fairfield Halls, this is a false statement.</p> <p>Such falseness renders the consultation null and void and without objective foundation.</p>	<p>No information provided about agreements with other authorities</p>		<p>No alternatives have been given</p>	<p>No sound basis is given for these figures</p>	<p>Track record of non delivery, especially on Fairfield Halls hence fails to be effective</p>	<p>Nothing demonstrated on this</p>	<p>Poor monitoring track record and none given</p>	

	Soundness								
	Positively Prepared			Justified		Effective			Consistent with National Policy
Contentious paragraph in Proposed Local Plan	Meets objectively assessed needs of Croydon	Informed by agreements with other authorities	Consistent with achieving sustainable development	Taking into account the reasonable alternatives	Based on proportionate evidence	Deliverable over the plan period	Based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred	Able to be monitored	In accordance with the policies in this Framework and other statements of national planning policy
Page 95 Acceptable in principle as long as it does not result in two or more adjoining A5 Hot Food Takeaway units at ground floor			We welcome this						

	Soundness								
	Positively Prepared			Justified		Effective			Consistent with National Policy
Contentious paragraph in Proposed Local Plan	Meets objectively assessed needs of Croydon	Informed by agreements with other authorities	Consistent with achieving sustainable development	Taking into account the reasonable alternatives	Based on proportionate evidence	Deliverable over the plan period	Based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred	Able to be monitored	In accordance with the policies in this Framework and other statements of national planning policy
<p>Policy SP4: Urban Design, Heritage and Local Character</p> <p>SP4.1 The Council will require Development should be inclusive and of a high quality which respects and enhances Croydon's varied local character and heritage assets contributing positively to public realm, landscape and townscape to create sustainable communities. The Council will apply a presumption in favour of development provided it meets the requirements of Policy SP4 and other applicable policies of the development plan.</p> <p>SP4.2 The Council will require developments to will be required to:</p> <p>a. Be informed by the distinctive qualities, heritage, character, identity, topography, diversity, local needs and opportunities of the relevant Places of Croydon;</p> <p>b. Preserve and enhance Heritage Assets and their settings, Protect Local Designated Views, Croydon Panoramas, the setting of Landmarks, other important vistas and skylines</p>		No information provided about agreements with other authorities	<p>Much stronger protection needed here for protecting local character and heritage, and tighter definition of what it constitutes.</p> <p>And why sp4.3 removed?</p>	No alternatives have been given	No sound basis is given for these figures	Track record of non delivery, hence fails to be effective	Nothing demonstrated on this	Poor monitoring track record and none given	

	Soundness								
	Positively Prepared			Justified		Effective			Consistent with National Policy
Contentious paragraph in Proposed Local Plan	Meets objectively assessed needs of Croydon	Informed by agreements with other authorities	Consistent with achieving sustainable development	Taking into account the reasonable alternatives	Based on proportionate evidence	Deliverable over the plan period	Based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred	Able to be monitored	In accordance with the policies in this Framework and other statements of national planning policy
Public Realm SP4.7 The Council will work with partners (including private land owners) to improve the public realm within the borough. Policy deleted		No information provided about agreements with other authorities	Why is this deleted? It fails the sustainable development test to fail to work with partners and makes it plain that draconian decisions will be made without consulting partners.	No alternatives have been given	No sound basis is given for this deletion	Track record of non delivery, hence fails to be effective	This is the very antithesis of effective joint working	Poor monitoring track record and none given	

	Soundness								
	Positively Prepared			Justified		Effective			Consistent with National Policy
Contentious paragraph in Proposed Local Plan	Meets objectively assessed needs of Croydon	Informed by agreements with other authorities	Consistent with achieving sustainable development	Taking into account the reasonable alternatives	Based on proportionate evidence	Deliverable over the plan period	Based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred	Able to be monitored	In accordance with the policies in this Framework and other statements of national planning policy
<p>Areas of Intensification</p> <p>6.7a In order to meet the development needs of the borough, sustainable locations to support sustainable growth have been identified on the policies maps as Focussed Areas of Intensification and Moderate Intensification. Whilst delivering tangible benefits including providing a richer mix of types and sizes of accommodation to suit different lifestyles, policies seek to ensure that development is of a good design, whilst reducing car dependency and promote local economic activity.</p>	<p>Objectively, this is not needed to meet the needs of the borough.</p> <p>Car driving reduction is a political objective unsupported by reality</p>	<p>No information provided about agreements with other authorities</p>	<p>Track record of this council is they do not provide “rich mix” but bring areas into disrepute.</p>	<p>No alternatives have been given</p>	<p>No sound basis is given for these figures</p>	<p>Track record of non delivery, hence fails to be effective</p>	<p>Nothing demonstrated on this</p>	<p>Poor monitoring track record and none given</p>	

	Soundness								
	Positively Prepared			Justified		Effective			Consistent with National Policy
Contentious paragraph in Proposed Local Plan	Meets objectively assessed needs of Croydon	Informed by agreements with other authorities	Consistent with achieving sustainable development	Taking into account the reasonable alternatives	Based on proportionate evidence	Deliverable over the plan period	Based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred	Able to be monitored	In accordance with the policies in this Framework and other statements of national planning policy
<p>Tall Buildings 6.8 The London Plan states that the development of tall and large buildings is one way of increasing an area's density and that Local Plans should identify where tall buildings should be located. For this reason, Tall buildings are directed to the Croydon Opportunity area and Croydon Metropolitan Centre to reinforce the role of this area as the borough's main centre. To ensure the development of tall and large buildings creates positive change the design of tall, large and high density buildings should take into account the character of the area such as preserving and enhancing the heritage assets (and their surroundings) and complementing local architectural styles that positively contribute to character.</p>		No information provided about agreements with other authorities	<p>Explicitly should exclude sites which are NOT Croydon Opportunity and Metropolitan Centre sites</p> <p>Without this explicit protection, and given the track record of this council, this cannot be considered to sustainable development</p>	No alternatives have been given	No sound basis is given for these figures	Track record of non delivery, hence fails to be effective	Nothing demonstrated on this	Poor monitoring track record and none given	

	Soundness								
	Positively Prepared			Justified		Effective			Consistent with National Policy
Contentious paragraph in Proposed Local Plan	Meets objectively assessed needs of Croydon	Informed by agreements with other authorities	Consistent with achieving sustainable development	Taking into account the reasonable alternatives	Based on proportionate evidence	Deliverable over the plan period	Based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred	Able to be monitored	In accordance with the policies in this Framework and other statements of national planning policy
6.25 Heritage assets including designated heritage assets (listed buildings, conservation areas, registered historic parks and gardens and scheduled monuments) and nondesignated heritage assets (including locally listed buildings, local heritage areas, locally listed historic parks and gardens to ensure their sustainable future whilst recognising the particular challenges climate change, inclusivity and accessibility can present.		No information provided about agreements with other authorities	The definition of "heritage assets" should include an explicit description of existing streets whose houses have period designs, and any new development must be in alignment with this Without this explicit protection, and given the track record of this council, this cannot be considered to sustainable development	No alternatives have been given	No sound basis is given for these figures	Track record of non delivery, hence fails to be effective	Nothing demonstrated on this	Poor monitoring track record and none given	

	Soundness								
	Positively Prepared			Justified		Effective			Consistent with National Policy
Contentious paragraph in Proposed Local Plan	Meets objectively assessed needs of Croydon	Informed by agreements with other authorities	Consistent with achieving sustainable development	Taking into account the reasonable alternatives	Based on proportionate evidence	Deliverable over the plan period	Based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred	Able to be monitored	In accordance with the policies in this Framework and other statements of national planning policy
6.56a The character and growth policies respond to the London Plan which says that gentle densification should be actively encouraged by boroughs in low and mid-density locations to achieve a change in densities in the most appropriate way. This should have regard to the target set for development on small sites by Policy H2 of the London Plan. To achieve the housing needs for the borough, areas where sustainable development can be focused for growth according to a series of sustainable indicators and characteristics of an area have been identified.	What is being proposed is not "gentle" by any objective assessment	No information provided about agreements with other authorities	What is being proposed is not "gentle" by any objective assessment, and is not sustainable development. It involves the wholesale destruction of the character of vast areas of the borough	No alternatives have been given	No sound basis is given for these figures	Track record of non delivery, hence fails to be effective	Nothing demonstrated on this	Poor monitoring track record and none given	

	Soundness								
	Positively Prepared			Justified		Effective			Consistent with National Policy
Contentious paragraph in Proposed Local Plan	Meets objectively assessed needs of Croydon	Informed by agreements with other authorities	Consistent with achieving sustainable development	Taking into account the reasonable alternatives	Based on proportionate evidence	Deliverable over the plan period	Based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred	Able to be monitored	In accordance with the policies in this Framework and other statements of national planning policy
<p>DM10.1 Proposals Development should be of high quality and, whilst seeking to achieve a minimum height of 3 storeys, should respect reflecting and maintaining the local character of the area including any heritage assets having regard to:</p> <p>a) The area's development pattern, layout and siting;</p> <p>b) The scale, height, massing, and density; line deleted</p> <p>.....</p> <p>.....</p> <p>The council will take into account cumulative impact.</p>		No information provided about agreements with other authorities	<p>Why is the line regarding scale, height, massing and density deleted?</p> <p>Why won't cumulative impact be taken into account?</p> <p>These actions render the proposal inconsistent with achieving sustainable development</p>	No alternatives have been given	No sound basis is given for these figures	Track record of non delivery, hence fails to be effective	Nothing demonstrated on this	Poor monitoring track record and none given	

	Soundness								
	Positively Prepared			Justified		Effective			Consistent with National Policy
Contentious paragraph in Proposed Local Plan	Meets objectively assessed needs of Croydon	Informed by agreements with other authorities	Consistent with achieving sustainable development	Taking into account the reasonable alternatives	Based on proportionate evidence	Deliverable over the plan period	Based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred	Able to be monitored	In accordance with the policies in this Framework and other statements of national planning policy
<p>Character and growth – Urban Intensification</p> <p>DM10.11a To deliver the homes that Croydon needs in suitable and sustainable locations that will accommodate higher levels of growth. In ...</p> <p>... Areas and Local Heritage Areas) to support evolution without significant change, the developments should complement the predominant height, scale and density of buildings in the area.</p>	<p>There is no objectively assessed need that requires undefined terms with regard to altering character to be allowed</p>	<p>No information provided about agreements with other authorities</p>	<p>This section directly conflicts with the above call for “gentle intensification”.</p> <p>This council has track record of ignoring local character – thus it needs to tighten the definition of “character” and how it is measured and assessed.</p> <p>What does “evolve” character mean?</p> <p>Then you say “change” character – this is inconsistent.</p> <p>What is “enhance” character?</p>	<p>No alternatives have been given</p>	<p>No sound basis is given for these figures</p>	<p>Track record of non delivery, hence fails to be effective</p>	<p>Nothing demonstrated on this</p>	<p>Poor monitoring track record and none given</p>	