

Mr Nick Tennant comments

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The comments below are submitted by the Riddlesdown Residents' Association (RRA), which represents approximately 1,400 households in the southern area of the London Borough of Croydon.

The RRA welcome the new London Plan's thresholds for affordable housing. We recognise the acute housing needs in our area, and wish to see more new homes that are genuinely affordable, provided for local people. We support new development that has a positive impact on the area's urban environment, public realm and provides social and economic benefits to the wider community. The RRA not not opposed to new development in our area as we understand that growth will be key to the future vitality and viability of the suburban District Centres in Croydon.

However, we wish to object to the new housing targets for Croydon proposed in the London Plan on the basis that this level of delivery is neither desirable nor achievable. As way of context, the current Croydon Local Plan (CLP) sets out an annualised rate of 1010 additional housing units, which is likely to be increased to an annual requirement of 1593 additional units in the soon to be adopted review of the CLP. This represents a significant (48%) increase in delivery, much of which will need to be provided in suburban areas like Riddlesdown.

The proposed London Plan annualised housing target of 2949 for Croydon is a staggering 192% increase on the current annualised requirement in the CLP. Whilst we understand that the GLA have assessed the demand (SHMA) and supply side (SHLAA) considerations of future housing provision, we cannot see any evidence that the plan considers the desirability of this level of provision from a sustainability perspective. Specifically, we cannot see any evidence that the physical, environmental and social capacity or capability of areas like Croydon to accommodate this level of housing provision has been explicitly considered in the development of these targets. Our concern is that these new annualised housing targets could have significant detrimental impacts in terms of air pollution, the transitional to low carbon, the existing streetscape and open spaces.

Linked to the above, we believe that it is critical that any new housing in areas like Croydon is supported by the necessary environmental, social and physical infrastructure. The new London Plan fails to set out a credible approach to infrastructure delivery. Rather, it identifies a significant potential funding shortfall and then discusses in qualitative terms possible options to address the shortfall.

London has never been required, or come close to, delivering the level of housing proposed by the new London Plan before. We are extremely concerned that such a radical intensification of areas like Croydon, particularly its suburban areas, needs to be underpinned by a robust, credible strategy for delivering the infrastructure required to support this level of growth. In addition, the new London Plan must set out clearly how Borough's should pro-actively work with infrastructure providers to ensure that the necessary infrastructure is provided before, or at the very least, parallel to housing delivery.