

Spatial Planning Team
6th Floor Zone B
Bernard Weatherill House
8 Mint Walk
Croydon CR0 1EA

Sent via email to: ldf@croydon.gov.uk

16 December 2015

Dear Sir/Madam,

Re: Consultation on Croydon Local Plan: Strategic Policies - Partial Review (Preferred and Alternative Options) and the Croydon Local Plan: Detailed Policies and Proposals (Preferred and Alternative Options)

CPRE London is the London branch of the Campaign to Protect Rural England. We are a membership based charity concerned with the protection and enhancement of London's Green Belt, Metropolitan Open Land and urban open and green spaces. We have over 2,700 members across London.

Thank you for providing the opportunity to respond to this important consultation.

General comments: We have received a number of emails from people concerned about the potential impact of Croydon's Draft Local Plan on their green spaces, in particular about changes to designation of Green Belt land to Metropolitan Open Land. We are also concerned with the proposed loss of both designated and undesignated green spaces across the borough. Please find our detailed comments below.

Green spaces and development

A large number of the sites allocated for development through Detailed Policies and Proposals may result in the loss of green space. This appears to run counter to the Borough's Strategic Objective 10 "The need to utilise brownfield areas first" and could be replaced with a goal to promote good quality high density developments that protect Croydon's green spaces. Even undesignated green spaces provide important ecosystem services to Croydon's growing population. **The Council should provide additional text in these policies to encourage developers to propose good quality, high density developments which promote the protection and enhancement of green space.**

The sites we have identified where we are concerned about potential loss of green space are:

- **DM33: Addiscombe, Reference number 474, Rear of the Cricketers:** We are also concerned about impacts on access to the adjacent MOL site
- **DM37: Crystal Palace and Upper Norwood, Reference number 82: St John the Evangelist Vicarage:** We are concerned about the potential loss of green space, which includes features that may be used by local community groups such as Scouts
- **DM40: Purley, Reference number 35, Purley Baptist Church:** We are concerned about the potential loss of open space used by the community for the proposed development; and **Reference number 130, 1-9 Banstead Road:** We are concerned about the potential loss of Green Infrastructure through the possible reduction of garden space through the proposed development. Any plans should seek to protect and enhance the green space
- **DM43: Shirley, Reference number 938: Land at Shrublands Estate:** The council should provide a map of the site allocation to ensure that it is clear which area is proposed for redevelopment. We object to any proposed development of open spaces in the Estate: any proposals must ensure that the open spaces are protected and enhanced. This should be reflected in this document to guide future planning applications
- **DM44: South Croydon, Reference number 345: Normanton Park Hotel, Normanton Road.** We are concerned about the potential loss of green space through this site allocation
- **DM45: South Norwood and Woodside, Reference number 486: Land and car park at rear of The Beehive Public House:** We are concerned about the potential loss of open space through this site allocation
- **DM47: Reference number 16, Heath Clark:** We are concerned about the potential loss of designated Local Open Land.

Changes in designation

The Council should explicitly state the reasons behind any changes in designation to Green Belt or Metropolitan Open Land and make clear why a designation has changed from one to the other, as this is not clearly understood by residents who have contacted us.

Enhancing Green Belt

The council should also state clearly where and how Green Belt areas will be protected and enhanced in line with National and Regional policy.

Policy SP7: Green Grid

CPRE London supports the 18 proposed extensions to the Green Belt and the statement in Policy SP7.2 that the Council will protect and safeguard the extent of the borough's Metropolitan Green Belt, Metropolitan Open Land and Local Green Spaces but we are very concerned that a number of proposals in the Draft Local Plan will lead to loss of protected green space:

- **The designation of Metropolitan Open Land (MOL) at Shirley Oaks should not be removed.** We believe the assessment that the land is separated from Ashburton Playing Fields is incorrect: there is a clear wildlife corridor between residential development and

the Shirley Oaks Hospital Site. In addition, the fact that the allotments are protected via other means (due to their being allotments) is not a reason to discontinue their designation as MOL in particular as they continue to meet MOL criteria in contributing features of nature conservation interest and as being part of the green chain of London. It is particularly important that the designation of MOL for the allotments stays in place to ensure they are fully protected into the future. [Our comments on the related proposed site allocations are set out under *Places of Croydon* Policies below.]

- **The Green Belt designation at Sanderstead Plantation should be changed to Metropolitan Open Land rather than being removed altogether.** While this site is separated from the wider Green Belt designation, the publicly accessible woodland still meets criteria for protection as Metropolitan Open Land and should therefore be allocated as such: according to Greenspace Information for Greater London, the site is a Grade II site of Borough Wide importance, is well used by the local community and is known for its variety of flora and its spectacular bluebells.
- **SP7 fails to mention proposed changes to designations at Portnalls Road** (see below)
- **SP7 also fails to (but should) mention proposed development (which would subsequently lead to de-designation) on Coombe Road Playing Fields: Reference number 662.** Elsewhere the council states that the site ‘meets the criteria for de-designation as Green Belt’ - though it does not make clear the reasons for this.

Policy: DM2: Development on Garden Land

This policy should recognise the wide ranging importance of gardens and should emphasise a presumption against development on garden land. In addition to their contribution to local character and biodiversity, which is acknowledged, private green spaces also play a part in regulating Croydon’s temperature and water flows (including helping prevent flooding) and this should also be acknowledged.

Places of Croydon Policies

These more specific site allocations represent a large reduction in the amount of designated and non-designated open space. While we acknowledge the need to build new homes and associated infrastructure such as schools, Croydon’s growing population also needs quality open spaces for all the human amenity and ecosystem services which they provide.

Our specific concerns are as follows:

DM32: Addington

- **Reference number 120, Timebridge Community Centre, Field Way:** We object to the allocation of this site for residential use. The site is already well used by the local community and the proposed development will lead to the loss of this green space.
- **Reference number 636, west of Timebridge Community Centre and the east of Lodge Lane (Rowden Fields):** We object to the proposed designation of this site for a new secondary school. The council’s Green Belt Review concluded it met its Green Belt designation and the proposed development is inappropriate. It has also been suggested

that school places are not actually needed in this catchment area (Local MP, Gavin Barwell¹) and, in any event, school place requirements constitute a general pressure and not the 'exceptional circumstances' required by the NPPF or London Plan to justify development on Green Belt.

- **Reference number 755, Pear Tree Farm and Pear Tree Farm Cottage:** this site still meets the criteria for inclusion within the green belt and therefore its allocation for a Gypsy and Traveller Site constitutes inappropriate development. Any proposals for development at this site must meet the NPPF, in that the existing footprint of buildings should not be exceeded. We are also concerned that the proposed development would lead to the relocation of the existing waste facility which must not lead to loss of green space elsewhere.

DM34: Broad Green and Selhurst

- **Reference number 119, Amenity land at Croydon AFC stadium:** Our understanding is that this site continues to meet the criteria for Metropolitan Open Land designation and so it is wholly inappropriate to allocate the site for a school. Additionally, the site is relatively inaccessible which would almost certainly lead to increased traffic even with improved public transport. Further efforts should be made to look into other sites. General pressures relating to increasing population should not be cited as exceptional circumstances required by National and London Policy to justify building on MOL.

DM35: Coulsdon

- **Reference number 60, Cane Hill Hospital Site:** The application for the development of 650 homes was initially approved in 2013 despite the site continuing to meet Green Belt criteria. As Barrett Homes and David Wilson Homes look to consult on future phases of the development the Council should ensure that the development represents an example of high quality, high density housing can work with good quality open spaces. Provisions must also be made to ensure that any associated infrastructure does not further encroach on Croydon's Open spaces.
- **Reference number 764, Land to the east of Portnalls Road:** Note: Policy SP7 does not reflect the fact that part of the site here is proposed for de-designation from the Green Belt: none of the sites in SP7 are linked to Portnalls Road. **The Council needs to make the proposed de-designation clear to ensure that the consultation is transparent. Given the adjacent Cane Hill housing development we would urge the Council to protect this open space and enhance it for the use by new residents, through designating it as MOL.**

DM43: Shirley

- **We object to the proposed development on green spaces, which are currently designated, and should remain designated, as part of the Shirley Oaks MOL.** As mentioned as part of our response to SP7, we feel that most of the site still warrants its MOL designation. We object to the following site allocations as they will fragment the

¹ <http://www.gavinbarwell.com/blog.asp?BlogID=1099>

green space impacting on residents' amenity and wildlife's use of the area (both current and potential):

- **Reference number 128: Land at Poppy Lane AND Reference number 548: Land to the rear of 5-13 Honeysuckle Gardens** Contrary to the council's statement in the Draft Local Plan, this site meets criteria for MOL in terms of its ecological value including nature conservation and habitat interest, with its mature trees and biodiversity, and has potential to be enhanced as per the NPPF and London Plan for leisure and recreation activities site
- **Reference number 541: Land to the East of Shirley Oaks Road and Reference number 542: Land to the West of Shirley Oaks road:** the presence of scattered detached housing does not impact the overall openness of the site, and therefore is not a reason to remove the designation of MOL and allocate for further development.
- **Reference number 502: Coombe Farm, Oaks Road.** This area of Green Belt has not been removed from the Green Belt via the Review process; therefore it must be assumed that it continues to meet the criteria for designation. Therefore, the proposed Gypsy and Traveller Site would be considered to be an inappropriate development (following Policy E of Planning Policy for Traveller sites published by the Government in August 2015) and the Council must prove that exceptional circumstances exist. The fact that it may in part be brownfield is not a reason in itself to waive this protection. We request clarification that any proposed development at the site must ensure that they use the same footprint of the building and do not increase any height, ensuring that the openness of the Green Belt is not affected.

DM44: South Croydon

- **Reference number 661: Coombe Lodge Nursery.** This area of Green Belt has not been removed from the Green Belt via the Review process, therefore it must be assumed that it continues to meet the criteria for designation and the proposed Gypsy and Traveller Site would be inappropriate development: the council would need to prove exceptional circumstances exist to allow development here. The fact that it may in part be brownfield is not a reason in itself to waive this protection. We request clarification that any proposed development at the site would use the same footprint of the building without any height increase, ensuring that the openness of the Green Belt is not affected.
- **Reference number 662, Coombe Road Playing Fields:** The Local Plan states that the site "met the criteria for de-designation" from the Green Belt however the site is not mentioned the policy SP7 which covers changes in Open Space Designations. The council should state clearly what reasons it gives for it no longer meeting criteria for designation as Green Belt. Even if the site does not meet Green Belt criteria, a change to MOL designation should be considered as the site has recreational use and therefore meets criteria for MOL. **The Council should remove the proposed site allocation and designate the site as Metropolitan Open Land.**

We are supportive of the following proposals

DM41: Sanderstead

- **Reference number 306: The Good Companions Public House:** we support the redevelopment of this, and other brownfield sites across the proposals.

DM45: South Norwood and Woodside

- **Reference number 121, Land adjacent to Croydon Sports Arena:** We support this allocation, and feel it shows appropriate consideration of the value of MOL “any proposed development should seek to ensure that any loss of loss open land is mitigated through alternative provision”.

DM46: Thornton Heath

- **Reference number 115, Cheriton House:** CPRE London supports the inclusion of the requirement that any proposals must address environmental impacts of redevelopment
- **Reference number 468, Grass area adjacent to, 55 Pawsons Road:** We support that any redevelopment would need to mitigate the loss of green space through alternative provision.

Yours faithfully,

Rebecca Pullinger
Green Belt Campaigner
CPRE London