

Environment, Housing & Regeneration  
London Borough of Sutton  
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Carshalton  
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By email to: [ldf@sutton.gov.uk](mailto:ldf@sutton.gov.uk)

30 March 2016

Dear Sir,

**CPRE London's response to Sutton's Draft Local Plan consultation**

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

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. CPRE London members also have a wider interest in parks and open spaces and green infrastructure.

**Question 24: Do you agree with the draft policy on the Green Belt and Metropolitan Open Land?**

**We do not support the release of seven sites from Green Belt / MOL and a number of other protected sites which have been identified for development within the Local Plan. We raise our concerns about individual sites below. While we acknowledge pressure to release land for housing or schools, we believe *releasing protected land is neither necessary nor desirable for the following reasons:***

- We do not agree that these areas poorly fulfil the Green Belt and MOL functions and indeed the council's own review states that these sites fulfil between five and eight of 11 evaluation criteria used.
- There should be a clear focus on brownfield sites and building higher density close to public transport and other amenities to ensure to reduce car-dependency and concomitant traffic and pollution. There should be a strict brownfield first policy to ensure developers do not cherry pick green sites and leave brownfield sites.
- Land protections, put in place for good reasons, for the benefit of all London and Londoners, should be given their due weighting.
- Pressure for housing or schools should not be regarded as special circumstances: these are generalised pressures affecting all of London.

However, we welcome the statement in the Sutton Local Plan Issues and Preferred Options that the council will not grant planning permission for inappropriate development in the Green Belt or Metropolitan Open Land unless very special circumstances can be demonstrated which clearly outweigh the harm to the Green Belt or Metropolitan Open Land (MOL). We were also heartened to note that there are also some gains in MOL including Mayflower Park at Worcester Park as well as the proposal to add the school playing field in Grove Park, Carshalton, to MOL (124.7).

### **Green Belt site**

#### **S96 - Land West of Wellfield Gardens**

We object to the de-designation of this as Green Belt because:

- We believe it is somewhat misleading to say that the area only “meets only five of the criteria of the Green Belt” when it could equally be viewed as performing its Green Belt function very well - it is holding back sprawl from the north as part of a wider section of Green Belt to the south. It is clearly performing that function in an area which appears to have suffered from some encroachment already. Further encroachment will make the Green Belt boundary even less defensible.
- The need for housing cannot be regarded as an exceptional circumstance so cannot be used as a justification for building on Green Belt.

Rather than releasing this land, we believe Sutton should

- Plan to enhance the site in order to better fulfil open space functions and
- Seek to identify suitable brownfield areas which can be developed for housing at high density close to transport and amenities, as an alternative to this site.

#### **S75 Woodcote Grove House**

As recognised in the Draft Local Plan, this site is not identified as appropriate for de-designation from Green Belt. We would not support any encroachment onto the Green Belt or allocation for use other than within the existing footprint of the buildings on site.

#### **S79 Lower Pillory Down**

We strongly object to any change to of use, in particular to residential - this is would be inappropriate for Green Belt land. The site is not identified as appropriate for de-designation from Green Belt.

### **Metropolitan Open Land sites**

#### **S76 / S77 Land to the West of Beddington Lane (A and B)**

We do not support the release of this land: it is distinctly open, has defensible boundaries and forms a clear part of a wider green space which has already suffered encroachment. This should be retained as MOL. The council lists the sites as being an Archaeological Priority Area, Metropolitan Green Chains, Metropolitan Open Land and Sites Of Importance For Nature Conservation. The council is obliged to plan to enhance sites of MOL and should consider doing this for this land in the context of plans for the wider area of Mitcham

Common. Site B is also listed as being part of the Wandle Valley Regional Park which it is an additional concern and it should remain part of the park, and be used as parkland, in that case.

#### **Land north of Kimpton Park Way (Potential Site Allocation S87)**

We do not support the option of developing this area as a Gypsy and Traveller site. This land should be retained as MOL and should only be developed in such a way that fulfils its designation as Land Safeguarded For Burial Space or Open Space.

- The need to provide accommodation does not constitute an exceptional circumstance and is not a justifiable criterion for de-designation.
- If the council were to designate the land as a Gypsy and Traveller site this would remove the possibility of it being returned to open green land in the future
- It would also risk potential encroachment on surrounding green space and parks, including Kimpton Linear Park in future.

#### **S92 Part of Rosehill Recreation Ground / S98 Tennis Centre at Rosehill Recreation Ground**

We do not support the release of this MOL for development. The site should be retained as an important area of MOL and the council should plan for its enhancement to be used for residents use in the future. We cannot see that good reason could be put forward for it to be de-designated from MOL because:

- It is a distinct area of ground which fulfils six out of 11 criteria by the council's own review and clearly fulfils the purposes set out by the Mayor of London in the London Plan
- The site is listed as an Area At Risk Of Flooding, part of a Metropolitan Green Chain, Metropolitan Open Land, Public Open Space, a Site Of Importance For Nature Conservation, and part of the Wandle Valley Regional Park. It is linked with distinct areas of green space to the North, East and West
- Additionally, the sports facilities are an important community asset and use of the Recreation Ground for sports should be encouraged. Increasing participation in sport is important in itself and the council can work with the sports centre or others to gain further benefit from the use of sports facilities for more local residents into the future.
- Notwithstanding any pressure for school places locally, this is not an exceptional circumstance. The need for school places is a generalised pressure facing the whole of London and cannot be used as a justification for building on MOL.

#### **S93/94 Reigate Avenue Recreation Ground (this is referred to as S94 in the Draft Policy on the Green Belt and MOL but identified as S93 in the Draft Local Plan)**

We do not support the release of this land: it should be retained as MOL because

- It clearly fulfils the criteria for MOL: the council's own review states it meets eight of the review's 11 MOL criteria
- It is in use as sports ground and releasing a thin strip of MOL in this way would make the space too small for a large number of sporting activities

- It would also pave the way for further development into the playing fields, the further encroachment onto which will compromise the playing field
- It will leave the MOL indefensible (i.e. lead to the possibility that an argument could be made that the entire area should be released)

### **S95 Surrey Tennis and Country Club**

We strongly object to the release of this area of MOL because:

- It will clearly leave it open to being developed for non MOL uses in the future.
- We do not agree with the review and believe that it *does* meet MOL criteria
- It is clearly part of a large open green space and is linked with green areas to the south and is used appropriately as a sports facility

### **S78 Land at Jessops Way**

The council lists this as a Strategic Industrial Location, however this should not be allocated for industrial land as

- It would be an inappropriate use for MOL
- This is clearly part of the wider area of green space incorporating Mitcham Common to the north
- The council also lists it as an Archaeological Priority Area, part of a Metropolitan Green Chain, Metropolitan Open Land, a Site Of Importance For Nature Conservation, and part of Wandle Valley Regional Park.

We would support its allocation for appropriate uses for MOL and the council should seek to enhance the area to ensure it is defensible into the future.

### **S3 Land North of Bedzed**

We strongly object to this land being allocated for a school or other development because:

- It is a clearly defensible piece of open land with a river running to the north side with huge potential to be improved for the benefit of all Londoners.
- The council recognises it as Metropolitan Open Space, Metropolitan Green Chain, Site of Importance for Nature Conservation, Archaeological Priority Area, Land Safeguarded for Wandle Valley Regional Park, partial area at risk of flooding.
- This site was not identified as an area for potential release in the GB/MOL review therefore we can assume that it is still fulfilling its purpose, according to the council's own review, and should not be allocated for a school or any other development.

### **Comments on other proposed site allocations**

Allotments and community food growing sites are increasingly regarded as vital to improve sustainability within London and ensure children are connected with food and farming. As such we believe it is short sighted to allocate food growing land for development and runs counter to London Plan policy.

- **STC23 Bus Garage and Allotments** We do not support any change to the allotments and would object to the allotment area being allocated for housing.

- **S65 Aultone Way Allotments** We do not support any change of use. The council recognises this as urban green space and there are Tree Preservation Orders in place. The site would be better developed as a community facility with local community groups who could use it for food growing as a community garden if the allotments are no longer in use.
- **STC42 Chaucer Estate** We do not support any change to the allotments and would object to the allotment area being allocated for housing.

#### **STC27 - Robin Hood School**

Given the stated need for more sites for schools, we would object to a change of use to residential, retail or community / leisure. The site should be retained for school use to avoid the need to take green space.

#### **S90 Land to the West of Carshalton Athletic Colston Avenue**

This should be retained as woodland, of which there appears to be very little in the immediate area. It is likely to be an important wildlife haven as such. Future suggested uses are allotments or open space. There are many other areas of open space which could be developed as allotments and indeed areas (as above) which are currently allotments and which could be retained. There are also many other areas of open space. It would be most beneficial to retain the trees.

#### **S97 Sheen Way Wallington - former playing fields**

There are large car parks near to this site and nearer to the train station Waddon which might be more appropriate to develop as housing or a school. The site is designated as Green Corridor, Urban Green Space, and an Archaeological Priority Area. Ideally this site would be retained as open space given limited amount in the area and nearby alternatives found for schools or housing.

#### **S99 - Collingwood Recreation Ground**

We object to the change of use to allow the building of a school on urban open space. This is a piece of land designated as being part of a Metropolitan Green Chain, as a Public Open Space and Urban Green Space. As such it should have purposes relating to these such as outdoor sport or recreation and for environmental benefits. Sutton should seek to develop schools on brownfield land first.

#### Concluding comments

While we have focussed on greenspace and protected green land, we do appreciate that there is a wider context and many pressures on the council. We would, however, urge that LB Sutton works to deliver non-protected sites as a priority rather than releasing protected land.

This land is strategically important for all of London. Londoners cherish the fact that theirs is a green city and we advocate the building of good quality, higher density developments in appropriate, brownfield sites, before any consideration is given to building on protected sites.

Thank you again for the opportunity to comment on this important consultation.

Yours faithfully

**Alice Roberts**  
Green Spaces Campaigner  
CPRE London