

Spatial Planning Service
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16th October 2016

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Dear Sirs

Croydon Local Plan: Strategic Policies – Partial Review (Proposed Submission) and the Croydon Local Plan: Detailed Policies and Proposals (Proposed Submission)

Objections relating to my ward of Sanderstead and proposals for adjoining wards which directly affect it

1. The intensification zone around All Saints' Church

I object to the creation of an area of focused intensification proposed for the locale around All Saints' Church in Sanderstead, as detailed in Table 11.2.

The policy clearly supports 'the intensification of areas which are developable, where there is adequate provision of community infrastructure, good accessibility to public transport and open space and schools'

The proposed area fails to meet these criteria on many levels. The proposed area is too large, covering many residential streets behind the major through route. The proposal will add demand to an already struggling infrastructure that does not have sufficient transport links, schools and community facilities. The proposed level of intensification is above the capacity that the character of the area can handle and there is no mechanism in the plan to deliver the improved infrastructure that would be needed. This element of the plan has not been positively prepared, is not justified or effective and is not consistent with national policy.

With regard to the proposed intensification area around All Saints' Church in Sanderstead, intensification in Onslow Gardens and surrounding roads would be contrary to the desire expressed in Strategic Policies p187/8 to retain and protect the view of All Saints Church from Limpsfield Road. Any intensification of the roads surrounding All Saints would inevitably block the view.

This area of intensification needs to be shrunk, within the plan, so as not to affect the surrounding suburban streets, thereby reducing the impact on the local infrastructure.

2. Loss of Green Belt Status – Sanderstead Plantation and Purley Downs Golf Club

I object to the de-designation of Sanderstead Plantation and Purley Downs Golf Club from Metropolitan Green Belt as detailed in Table 6.1, Amendments to Green Grid Designations, as this would not comply with policies SP7, DM19, DM27, DM28 and DM48 and the protection of the green grid. These tracts of land are instrumental in checking the unrestricted sprawl of the large built up areas around them.

In the context of the 'Review of Metropolitan Green Belt and Metropolitan Open Land' produced in July 2016, it is clear that this land does meet Metropolitan Green Belt as it does check the unrestricted sprawl of London, does safeguard Croydon's countryside from encroachment, preserves the setting and special character of the heritage of Croydon and assists in regeneration by encouraging the recycling of derelict and urban land. This proposed de-designation has not been positively prepared, is not justified or effective and is not consistent with national policy.

3. Proposals in adjoining wards which directly impact my ward

I object to the **de-designation of Croham Hurst from Metropolitan Green Belt** as detailed in Table 6.1, Amendments to Green Grid Designations, as this would not comply with policies SP7, DM19, DM27, DM28 and DM48 and the protection of the green grid. This tract of land is instrumental in checking the unrestricted sprawl of the large built up areas around it. Indeed, it was bought by the Council to prevent the landowner developing the site at the turn of the 20th century. The history of attempted development of Croham Hurst Golf Club in recent decades poses a real risk for the character and the setting of the area and the potential impact on this heritage asset. The historical context of Croham Hurst is incredibly important and it should be given the upmost protection, as it is a biological Site of Special Scientific Interest and a site of metropolitan importance for Nature Conservation. The site also contains a Bronze Age round barrow, which is a scheduled Ancient Monument.

In the context of the 'Review of Metropolitan Green Belt and Metropolitan Open Land' produced in July 2016, it is clear that this land does meet Metropolitan Green Belt as it does check the unrestricted sprawl of London, does safeguard Croydon's countryside from encroachment, preserves the setting and special character of the heritage of Croydon and assists in regeneration by encouraging the recycling of derelict and urban land. This proposed de-designation has not been positively prepared, is not justified or effective and is not consistent with national policy.

I cannot see any justifiable reason why Croham Hurst is being treated differently to the rest of the green belt within Croydon. It is imperative that it retains its Metropolitan Green Belt status.

I object to **West Hill (Croham ward) not being created as a Local Heritage Area**, and losing its protection as a Local Area of Special Character, as detailed in Local Heritage Area Review, section 3, Assessments of the Areas Proposed as Part of the Consultation on Croydon Local Plan.

Some recent planning decisions have shown that these areas are not sufficiently recognised and protected by the general policies in chapter 7 paragraph 58 of the National Planning Policy Framework, policy 7.4 of the London Plan or policy SP4 of the Croydon Local Plan.

Like the other roads listed below for losing their LASC status without becoming LHAs, this road needs additional protection to maintain its historical context and character. They comply with policies SP4.11, SP4.12 and SP4.13 and should be designated as Local Heritage Areas. It would not be justified or effective to exclude these roads from Local Heritage Area protection.

4. Gypsy and Traveller site at Purley Oaks Depot

I object to the use of site 324, Purley Oaks Depot, 505-600 Brighton Road as a Gypsy and Traveller site, as detailed in policies SP2.9 and DM44.

This site fails to meet many of the specific policies of SP2.9, namely that sites should have access to essential services, not be located in areas of high flood risk and not have an unacceptable adverse impact on the biodiversity of the borough.

The site is also a designated site in the adopted South London Waste Plan, policy WP4, Schedule 2, Area 99. This plan states that the following issues would need to be considered: protecting the residential amenity of those properties adjacent to, or in the vicinity of the site; limiting traffic movements so as not to hinder traffic flow on the surrounding roads; respecting and enhancing the on-site wetlands habitat; minimising flood risk on and off site; evaluating and preserving any archaeological remains; remediating the site of historical contamination. This site is particularly important for this waste designation as only a small number of sites have been designated across the four boroughs for waste expansion.

Purley Oaks Depot sits behind a major borough recycling centre that needs expansion. This proposal would preclude that expansion. The site has been used as a depot for many decades dealing with concrete and road surfacing etc. and is no doubt the subject of contamination. The site also contains the balancing pond that is vital in local flood defence. Other sites have been excluded on the issue of noise, yet this is next to the main railway line. The local road network also lacks capacity. The Council's original report on the site scored it as low for reasons such as flood zone, ground water source protection zone, surface water management, existing infrastructure, heritage designations and impact on local character

The Council's own assessment is subjective with scoring values being disproportionately weighted. Where multiple options apply, the lowest score has been given.

Prior to this consultation there has been no public consultation on this site, putting local residents and businesses at a disadvantage.

This element of the plan has not been positively prepared, is not justified or effective and is not consistent with national policy.

As an alternative the plan should look to use underused industrial sites similar to the existing site at Lathams Way. There are many vacant plots in the environs of the Purley Way and in places such as Commerce Way.

Objections to proposals in other wards

Loss of MOL status for areas of Shirley Oaks Village

I object to the de-designation of Metropolitan Open Land (MOL) at and around Shirley Oaks Village, as detailed in Table 6.1, Amendments to Green Grid Designations, as this would not comply with policies SP7, DM27 and DM47 and the protection of the green grid.

This site needs an element of protection in perpetuity, as it is amenity land that is well used by the local community. This de-designation could result in the loss of a significant recreational facility

which forms part of the character of the area. In this respect the plan is not positively prepared, is not justified or effective and is not consistent with national policy.

In the context of the 'Review of Metropolitan Green Belt and Metropolitan Open Land' produced in July 2016, it is clear that this land does meet MOL status as it does contribute to the physical structure of London as it forms a major part of the character of Shirley and Shirley Oaks, and these open air facilities do serve a significant part of Croydon and, therefore, London. It forms part of a much wider green space that is viewed as a whole by the local community and should be treated as such within the green grid. Indeed, there is already a pedestrian link between Shirley Oaks Hospital and Ashburton Playing Fields. To de-designate this land would not be justified, effective or consistent with national policy.

As a minimum this land should have Local Green Space protection as it meets all the criteria for that designation, namely proximity to the community it serves, local in character, a tranquil area and a site of natural open space. There seems to be little distinction between this area and others like it that will maintain their protection, so why de-designate it?

The plan should be amended to maintain the whole of this land as MOL.

Proposals for Purley district centre

I object to the introduction of policy DM44.1, sub section B, which states that developments in Purley have a 'potential for a new landmark of up to a maximum of 16 storeys', when the existing building height ranges from 3-8 storeys. This policy conflicts with policy DM11.1 as such development would not 'enhance and sensitively respond to the predominant built form'. Furthermore, it does not comply with policy SP4.6 which states that some areas will be 'inappropriate for tall buildings' and that applications should 'respect and enhance local character and heritage assets, as well as minimising environment impacts and responding sensitively to topography'. As such policy DM44.1B has not been positively prepared and is not justified or effective.

The addition of a swimming pool at Purley Leisure Centre, site 30 Table 11.13, is to be welcomed. However, the language used does not require a 'like for like' replacement with a 25m pool with spectator seating to enable competition use, which could result in the replacement pool being inadequate for local demand. As such this site proposal does not currently comply with policy SP5.3, sub section B, 'protecting existing community facilities that still serve, or have the ability to serve, the needs of the community.

This site proposal should be amended to allow for the exact replacement of the existing facilities.

Restrictions on HMOs

Many roads and communities across Croydon are suffering from the cumulative impact of too many Houses in Multiple Occupation. This is a particular problem in areas where larger houses are easily converted to bedsits and studios. The Council should introduce an additional policy into SP2: Homes, that recognises the impact that HMO's have on an area and seeks to limit the numbers, so that existing communities are not overwhelmed by an increasing population that puts further strain on highway parking, refuse and recycling collections and street cleansing. As an example, such a policy would have a dramatic, positive, impact in areas such as Blenheim Park Road and Birdhurst Road in South Croydon, Chatsworth Road and other similar roads on the periphery of the Croydon Opportunity Area in Central Croydon and many of the roads around Croydon University Hospital.

A new clause could be added to policy SP2.7. Mix of Homes by Size that restricts HMO's to 25% of properties in any one street.

Loss of LASC status in various roads

I object to Cheston Avenue, Preston Road, Woodcote Valley Road, Woodcote Estate, West Hill, Covington Way, Stanhope Road, Oakwood Avenue, Whitgift Estate, Huntly Road and Sanglely Road not being created as Local Heritage Areas, and indeed many of them losing their protection as Local Areas of Special Character, as detailed in Local Heritage Area Review, section 3, Assessments of the Areas Proposed as Part of the Consultation on Croydon Local Plan.

Some recent planning decisions have shown that these areas are not sufficiently recognised and protected by the general policies in chapter 7 paragraph 58 of the National Planning Policy Framework, policy 7.4 of the London Plan or policy SP4 of the Croydon Local Plan.

All of these roads and estates need additional protection to maintain their historical context and character. They comply with policies SP4.11, SP4.12 and SP4.13 and should be designated as Local Heritage Areas. It would not be justified or effective to exclude these roads from Local Heritage Area protection.

Excess size of focused intensification areas

I object to the creation of areas of focused intensification proposed for Kenley, South Croydon, Forestdale, Sanderstead (already referenced above) and Shirley, as detailed in Table 11.2.

The policy clearly supports 'the intensification of areas which are developable, where there is adequate provision of community infrastructure, good accessibility to public transport and open space and schools'

The proposed areas fail to meet these criteria on many levels. The proposed areas are too large, covering many residential streets behind the major through routes. The proposal will add demand to an already struggling infrastructure that does not have sufficient transport links, schools and community facilities. The proposed level of intensification is above the capacity that the character of the areas can handle and there is no mechanism in the plan to deliver the improved infrastructure that would be needed. This element of the plan has not been positively prepared, is not justified or effective and is not consistent with national policy.

Such areas of intensification need to be shrunk, within the plan, so as not to affect the surrounding suburban streets, thereby reducing the impact on the local infrastructure.

I would like to participate in the oral part of the Examination in Public.

Yours faithfully



Cllr Tim Pollard
Ward Councillor – Sanderstead
Leader of the Opposition