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Croydon Local Plan: Strategic Policies – Partial Review Main Modifications

Comments made in my capacity as a Sanderstead ward councillor and relating specifically to Sanderstead ward

MMD86 – I strongly object to the deletion of the Local Green Space designation across the borough and with particular reference to several vital green spaces in Sanderstead: Sanderstead Plantation, The Gruffy, the pond at the top of Sanderstead Hill and Purley Beeches. Should regional protections be changed by a future London Mayor, these spaces would have no protection and would be available for development. This is not in the interests of my residents, who greatly treasure these spaces, all of which have active Friends' Groups as a testimony to their local importance. There is more detail on my objections to the deletion in principle in the general section below.

MMD38 – Focussed Intensification Zones should be removed in their entirety from the plan, despite the modifications proposed by the Council. I am, however, pleased that the Inspector has deleted the entirety of the proposed Sanderstead (Onslow Gardens) zone. This was in contradiction with other policies (as per my previous two objections at the preceding stages) and its removal is warmly welcomed.

Comments made in my capacity as Conservative Group Leader on aspects of the plan affecting other areas or the borough as a whole

MMS30 – This modification should be further amended so that all lands at Shirley Oaks remain within the designation of Metropolitan Open Land. The residents of Shirley and the Shirley Oaks Village Residents' Association have made excellent submissions which prove beyond doubt that all of the land at Shirley Oaks should be Metropolitan Open Land.

MMS33 – This modification should be amended so that site 662, Coombe Road Playing Fields, is not deleted from the Metropolitan Green Belt. This land forms a continuous part of the surrounding Metropolitan Green Belt and protects against the spread of development in this area. To de-designate this site for education use would be totally unfair on local residents, particularly as similar sites covered by MMD89 and MMD107 are receiving different treatment. Having read the various discussion papers, D2 and D2.1 and the Council's responses it is clear that the only reason that this site is being de-designated is because of the Council's commercial and contractual arrangements.

Local residents are genuinely and rightfully concerned that if this de-designation goes ahead and the school does not, then the site will simply become a development site. Indeed, if a school is built and

further down the line closes through a fall in numbers etc., then the site could once again simply become a development site.

The Council has stated that

‘The ESFA has agreed the funding for a Free School secondary school provided by the Folio Trust on the site. This can be viewed via the link below or note the extract at appendix A. The identification of a possible site is very likely to have been a factor in the ESFA agreeing the funding for the Free School.

<https://www.gov.uk/government/publications/free-schools-open-schools-and-successful-applications>

The Council is the landowner of the site and discussions regarding the draft Heads of Terms for a 125 year long lease with the Folio Trust are at an advanced stage with principles agreed.’

It is wrong that this policy with regard to land use is being determined by commercial arrangements and potential planning applications that may be regarded as pre-determined.

The Council has failed to prove that a school is required in this location, which has a deficit in public transport and an already straining infrastructure. The Council numbers refer to North and South only and, therefore, site 16, Heath Clark, Stafford Road, could still be pursued to meet that ‘southern’ need.

In the Inspector’s own discussion paper D2 he states

‘the case for removing these sites from the Green Belt (and MOL) is not convincing. Moreover, as the Council’s evidence document LBC-PR049 recognises, if de-designation of Green Belt occurs, the land can potentially be taken up by other development if the schools do not proceed so, if the case for releasing Green Belt land for development rests on educational needs, that case needs to be much more immediate and certain than that advanced by the Council.’

At the very least the Council should have considered a re-drawing of boundaries for this site to ensure that the bulk of the site remained with the Metropolitan Green Belt or moved the location of the school buildings to the adjoining nursery site in Conduit Lane, which is also in its control and could provide a better access to the local road network.

Croydon Local Plan: Detailed Policies and Proposals Main Modifications

MMD17, 20 and 21 – The modification to remove the policies around A5 uses are regrettable. Not only does this modification go against Health England’s position on growing obesity and the links with hot food take aways, but also ignores the often anti-social issues related with such uses, such as late opening, noise, crowd congregation, litter etc. The Council and political groups have put forward a cross party position on this issue. These modification should be withdrawn.

MMD28 – DM11.1 - The reference to achieving ‘a minimum height of 3 stories’ should be removed as this would conflict directly with so many policies around character and place.

Welcome the two paragraphs around HMO’s which recognise the issues around noise, refuse collection, parking and cumulative impact. It would be helpful if reference could be made here to the conversion of HMO’s in conservation areas respecting the management plans for those areas (CAAMP). It would be of further use if there were some guidelines against which the issues of noise and cumulative impact could be measured.

MMD31 – DM11.4 - The issue of back garden development was discussed at length at the public hearings and it became apparent that there was much ambiguity within the policy. Whilst these modifications attempt to pull together the many strands of design and character, the element around back gardens remains open to interpretation. The wording could be further amended to read

‘In the case of development in the grounds of an existing building which is retained, a minimum length of 10m and no less than half or 200sqm (whichever is smaller) of the existing garden area is retained for the host property **excluding any access/service roads, bin stores etc.**, after the subdivision of the garden.’

Such an amendment would be more in keeping with the sentiment that officers said the policy was trying to achieve.

MMD32 – DM11.6 – d & e – Who defines what are ‘adequate’ and ‘significant loss’. Agreed measures should be introduced.

MMD38 – Focussed Intensification Zones should be removed in their entirety from the plan, despite the modifications proposed by the Council. Throughout the public hearings the Council struggled to defend the proposed boundaries for all the proposed intensification zones. Indeed when the justification for the zones was produced it was littered with contradictions, omissions and errors. The revised boundaries remain inconsistent and highlight that there has been no rigorous process for arriving at this policy. It is clear that the desire for the zones has been established, the zones have been drawn up and the policy has then been drafted to substantiate the areas chosen.

Whilst the Council has amended some of the boundaries of the proposed intensification zones they have still used incomplete evidence to justify the policy. The whole policy is arbitrary, unsound and should be removed completely.

MMD86 – Strongly object to the deletion of the Local Green Space designation. Croydon is London’s greenest borough and its residents are rightfully proud of this. It could, therefore, be expected that the borough would have a large number of Local Green Spaces. To remove this designation will leave many green spaces with no protection, despite them being of great importance to their local communities. Many of these Local Green Spaces are looked after by friends’ groups and the numbers of these groups are growing all the time. At a time when Croydon is removing its officer support for parks and green spaces and becoming more reliant on friends’ groups it is vital that these wonderful spaces do not lose their protection.

Croydon Council took the approach to designate land as Local Green Space rather than to prepare an ‘alternative’ designation that would have the same effect. It was trying to embrace the new designation put forward in the National Planning Policy Framework rather than create additional designations which had no material difference. The Council’s proposed policy adheres to paragraph 77 of the NPPF, in that ‘the designation should only be used: ● where the green space is in reasonably close proximity to the community it serves; ● where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and ● where the green area concerned is local in character and is not an extensive tract of land.’

The Council’s proposed policy further accords with government guidance on Local Green Space which can be found at:-

<https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

The Council continues to believe that, as demonstrated by the lack of any objection from local residents, friends' groups or other parties, that the proposed Local Green Spaces are demonstrably special to Croydon's local communities and hold a particular local significance by virtue of meeting one of the examples set out in paragraph 77 of the National Planning Policy Framework.

The Council and political parties have submitted a cross party representation on this item requesting that this modification be removed as it is unjustified.

Finally, I would like to refer to the Inspector's discussion paper D5, with regard to gypsy and traveller provision. The Inspector has rightly identified that

'13. The most compelling planning argument against the allocation of site 324 for gypsy and traveller pitches is that it is already included in Schedule 2: Industrial Areas with Sites Suitable for Waste Facilities of the South London Waste Plan adopted in March 2012. This is a schedule of 19 sites where single or multiple waste management facilities or waste transfer stations will be permitted in order to provide sufficient waste management facilities to meet the Waste Plan's capacity needs.

14. Although Schedule 2 indicates that the likely timescale for redevelopment is 2017-2021, no current proposal to develop this site for waste has been put forward. The most recent South London Waste Plan monitoring report suggests that the management action necessary to address the capacity gap is to explore greater deliverability on Schedule 1 sites, (including the Purley Oaks Household Waste and Recycling Centre on Brighton Road adjacent to site 324).

15. The Council points to a lack of objections from the partner authorities in the South London Waste Plan to the proposal to allocate site 324 for gypsy and traveller pitches. I am not convinced that such a lack of response renders the Council's unilateral action sound in overriding a jointly prepared plan.

I would agree with the Inspector's views on this matter, particularly as there is a desperate need to enlarge the recycling facilities at the adjoining site. I believe that the Council's unilateral action on this site is unsound and that the plan should be modified to remove this site.

Yours faithfully



Cllr Tim Pollard

Leader of the Conservative Group

Ward councillor for Sanderstead