

London Borough of Croydon  
Spatial Planning  
Bernard Weatherill House  
8 Mint Walk  
Croydon  
CR0 1EA

**16 October 2016**

Dear Sirs,

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

The objections and comments/observations below are submitted by the Riddlesdown Residents' Association (RRA), which covers an area, mainly located in and between the Wards of Sanderstead and Purley and a small part, just within the Kenley Ward. We represent 1,400 households within our area.

**Objections**

1) We object on behalf of our residents to the proposed **Gypsy & Travellers' site at Purley Oaks Highways Depot (Site 324 in the CLP)** as detailed in policies SP2.9 and DM44. To support our objections, we refer to the Government's national "Planning Policy for Traveller sites" dated August 2015 issued to all Local Planning Authorities; [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/457420/Final\\_planning\\_and\\_travellers\\_policy.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/457420/Final_planning_and_travellers_policy.pdf) Specifically, we believe that the site proposed is not consistent with national planning policy for travellers, as it is not sustainable economically, socially and environmentally in terms of a location for travellers (Govt. Policy, para 13) as:

- It is unsuitable for its intended purpose, given that, it is surrounded by residential properties. As such, a travellers site at this location would have a detrimental impact on the local environment quality in terms of amenity, noise, air quality and wellbeing (for both existing residents and the traveller community) as it is completely out of place in a suburban, residential environment (Govt. policy, para 13.e).
- Linked to the above, the site is very close to the main London to Brighton/Gatwick Express railway lines, so train noise would result in unacceptable noise pollution 24/7. Nearby residential dwellings are better insulated against noise pollution, than travellers' mobile homes (Govt. policy, para 13.e).
- The close proximity of the balancing pond for the Caterham Bourne and the associated high risk of flooding, make this site completely unsuitable. This pond is polluted, full of hazardous materials and would therefore represent a significant danger to any children living and playing at the proposed site (Govt. policy, para 13.g).
- The site is potentially contaminated given its industrial use over many decades (Govt. policy, para 13.e).
- There are more appropriate sites in the Borough. Croydon Council's "Assessment and Selection of Sites for Gypsy and Travellers" dated August 2015 identified 16 other sites with the same or a better total score than Purley Oaks Depot, in terms of

their suitability for a traveller site, including seven sites which are Council owned. Reflecting this, there is a lack of robust evidence to support Purley Oaks Depot as it appears to fail on virtually all the key criteria in the published assessment and selection of such sites. We do not believe that this site represents the most appropriate location for a traveller site given the lack of consideration of alternatives in the Plan, and the lack of robust evidence to support its inclusion.

- Linked to the above, the Council should consider the potential to use underused industrial sites in the Borough. There are many vacant sites along the environs of the Purley Way (including land at the old airport site; site 536) that would be more suitable and are located away from residential areas – consistent with para 13 of national planning policy for travellers. National planning policy also states that no alternative travellers sites should be considered or allowed on any Green Belt land (Govt. Policy E; para 16).
- There has been no previous public consultation on this proposal, putting local residents and businesses at a clear disadvantage.
- The location of a Gypsy & Travellers site at this Depot would prevent any future expansion of the adjoining Household & Recycling centre.
- The closure of the Highways Depot will result in the relocation of the gritting lorries to other parts of the Borough (probably Factory Lane) which will be detrimental to the hillier, southern parts of the Borough, which usually experience heavier snowfalls in winter, than the central and northern parts. This is a major policy change.

2) We object to the de-designation of Purley Downs Golf Club from Metropolitan Green Belt (MGB) to Metropolitan Open Land (MOL). The Council have not provided sufficient evidence to justify the proposed change. In particular, it is inconsistent with the proposed re-designation of, two adjoining pieces of land off Lower Barn Road and at St. Edmund's Church Green, as new MGB. The Golf Club land is much more prominent, especially from the vistas on Riddlesdown Ave and Riddlesdown Rd, compared to the two parcels of land in Lower Barn Rd.

The Council's response to our objection last December, said *"Purley Downs is an important open space that requires the same level of protection that its existing Green Belt designation affords it. As it surrounded on all sides by built up area it is incorrectly designated as Green Belt (which should by definition surround a built up area or provide a buffer between it and the next built up area, so it will be re-designated as Metropolitan Open Land which provides an identical level of protection but is a more appropriate designation for this area."*

We accept that MOL carries the same policy weight in terms of protecting land against development as MGB. The issue is the inconsistency with re-designating the two parcels of land in Lower Barn Rd from MOL to MGB, which about the Purley Downs Golf Course land. We suggest that the Council reconsider this de-designation.

**3) Purley District Centre** - We object to the proposal for a 17 storey building and 8 storey building in the centre of Purley. This policy is being brought forward linked to the Baptist Church in Banstead Rd/Brighton Rd, and the ongoing Mosaic Place proposal. As we have made clear in our objections to the planning application, a building of 17 storeys will

completely change the character of Purley town centre and is wholly out of keeping with the existing Purley town centre, where the current development is no higher than 5 to 6 storeys. The key issue is whether this proposal (and the planning application) represents an appropriate use of both sites in Banstead Rd given their strategic location and significance in terms of the future regeneration of Purley District Centre and the wider locality. Our specific concerns are:

- a) What is the robust evidence that Purley needs a “landmark” building from environmental, physical, social and economic perspectives?
- b) Linked to a), what is the robust evidence that landmark buildings are the most appropriate form of development for both sites?
- c) What is the robust evidence that the proposal would make a positive contribution in terms of economic benefits and the long term regeneration of Purley District Centre? We also object to the definition of Purley in the proposed changes to the Plan. It is not entirely clear whether Purley is regarded as a suburb that is proposed to experience sustainable growth, as there is no reference to “sustainable growth” or “suburbs” in the Purley section of “The Places of Croydon.” However, policy SP1.3 identifies “Purley, Coulsdon and, Broad Green & Selhurst and Thornton Heath and Coulsdon accommodating medium and moderate residential growth”. Linked to this, if Purley is a suburban area as identified by the plan, how can it be subject to both “sustainable growth” (para 1.2) and “moderate growth” (key diagram)? And how can Purley accommodate both medium and moderate residential growth when these are classified separately in the key diagram?

Linked to the above, we object to the growth proposed for Purley as the proposals for growth in the proposed changes to the Plan do not appear to be based upon a systematic, quantitative assessment of the capacity of areas like Purley to accommodate additional (new) housing over the next 20 years. Whilst a capacity assessment has been undertaken for the central Croydon area, a comparable approach does not appear to have been undertaken for other areas. Rather, the technical intensification papers and Focussed Intensification Analysis (FIA) appear to suggest that the typology derived by the Borough Character Appraisal evidence is being used to generate estimates of suburban housing growth across the Borough. However, taking Purley as an example, it is not clear how this approach (linked to policy DM35.3) has led to the range of net housing growth (310 – 2,070 units) identified in the FIA, with the accompanying housing densities of 64-119 (dwellings per hectare?). The FIA is not clear whether these figures relate to the plan period or indeed the ‘medium/moderate growth’ proposed for Purley in SP1.3?

Whilst the FIA appears to use PTA as a proxy for accessibility, it is not clear whether this is solely based upon the existing PTA (i.e. including the potential for existing infrastructure to accommodate more growth) or whether technical work has also been undertaken to assess what additional physical (transport) infrastructure would be required to accommodate the levels of housing growth proposed.

Linked to policy SP1.3, what does ‘as a broad location’; - “The main focus of major

residential growth will be in and around the District Centre” mean in paragraph 7.59? It is a very ambiguous statement which needs to be clarified by the Council.

**Further comments from the RRA letter dated 17 December 2015, which in our view, have not been satisfactorily addressed in Croydon Council’s response to the consultation document**

**4) CLP1 Page 183, - Designated views and landmarks** – Our comment in December 2015; *“The RRA would again like to suggest the following additional viewpoints to the list on page 45 CLP1; the top of Coombe Wood Hill/northern end of Ingleboro Drive, looking north towards Croydon and most of London for circa 15 miles. From the “Donkey Field” on Riddlesdown Common (behind circa 88 Ingleboro Drive) again looking north towards Croydon and central/north London and the same distance.”* For the first view proposed, we can understand that it’s not in an area identified on the public realm map (fig 5.1). That said, it’s not clear what criteria the Council have used to identify landmark views, nor is it sound or reasonable to argue that the view from Coombe Wood Hill in respect to London is beyond the consideration of the Council in terms of the plan. The view of London, beyond Croydon, is capable of being a material consideration when developing landmark view policies for the Borough. The vista of central London from Coombe Wood Hill/Ingleboro Drive creates a striking visual backdrop for the views of central Croydon. Together, these views reinforce each other to create a stunning urban panorama which is highly valued by residents in terms of Riddlesdown’s amenity and environmental quality.

The same arguments apply to the landmark view proposed from Donkey Fields, which by virtue of its location on publicly accessible open space, has significant amenity and environmental value for the residents of Riddlesdown. The RRA’s objection is based upon concern that inappropriate development could lead to the loss or blight of these views, which in turn would have a significant, detrimental, impact upon the amenity of Riddlesdown’s residents and the areas’ environmental quality. We believe the Council should reconsider their approach to designation in the light of these arguments.

**5) CLP2 Page 272 – Riddlesdown as a place;** Our comment in December 2015; *“The RRA are again extremely disappointed to note that very little mention is made of Riddlesdown within the proposed Plan and it would appear from various plans published in the proposed documents, that we are located in the three “Places” of Purley, Sanderstead and Kenley/Old Coulsdon! A small area in the centre of Riddlesdown is also in a blank area on the “Places” plan (CLP 2 map in the contents)! Riddlesdown might not be large enough to be a “Place” but it has the largest secondary school in the Borough (Riddlesdown Collegiate with 2,000 children plus 250 staff), a railway station, eleven retail frontages on two sites (6 & 5), including a vital sub post office, a chemist, two convenience stores, a church, a large Common and associated adjoining Green Belt land, arable land and woodland. It is surprising then, that the Council have again made very little reference to Riddlesdown’s existence! The topography of Riddlesdown, with local infrastructure, clearly makes it an important area within the Borough. We would ask that more reference is made to*

*Riddlesdown within the Plan!*” We found the Council’s response unhelpful as the proposed changes do not address the RRA’s concern. The issue here is that Riddlesdown should be recognised as a centre (neighbourhood) by virtue of its size, facilities and amenities (shops at two locations, a church, the largest school in Borough, a City of London Common, a railway station and a population in the region of 4,500). As an outer suburban centre with significant amounts of open space, the Plan should recognise it, given its function and range of facilities. We would hope the Council reconsider this and make more mention of Riddlesdown in the Plan.

**6) CLP2, Page 1714 – Parking in Purley;** Our comment in December 2015, *“Policy 40.4, Table 11.3, Site 61 (page 168 – CLP2). The car park at 54-58 Whytecliffe Road South is being re-designated as residential. Given the parking problems in Purley town centre, any new scheme should have at least as many public parking spaces as the current car park. This in turn could add additional parking issues in the streets close to Riddlesdown station, as an alternative for commuters to park”*

Again we found the Council’s response unsatisfactory. The Council need to provide robust evidence why, given the site’s strategic location, it would not be possible to maintain the current level of car parking provision as part of any redevelopment of the site. The site’s central location would suggest that there is sufficient commercial viability to redevelop the site for residential purposes and maintain the level of existing car parking provision.

**7) CLP2, Page 75 – Parking and garage sizes;** Our comment in December 2015, *“Lack of Parking in new developments - Policy DM28 (page 115-116 – CLP2) requires developers to provide fewer parking spaces in areas of low public transport accessibility than the London Plan allows for. The RRA are watching with alarm in our area, the increased on street parking that is occurring principally because of the Council’s poor planning policies on parking. More on street parking is creating huge implications for road safety for pedestrians, motorists and cyclists. The Council assumes that this will lead to fewer people owning their own car. In fact, it is leading to more and more pressure on on-street parking. The Council should be allowing higher levels of parking in all locations than the London Plan contemplates, because so many of our District centres (such as Purley and Coulsdon) already have very severe parking problems. Policy DM29 (page 120 – CLP2) prohibits temporary car parks. This is too restrictive as temporary car parks may sometimes be needed. We believe the Council also need to follow policies that other Local Authorities are adopting in respect of increased on-site parking. We also believe that all new houses, if they have garages, they should be a minimum size of 7m x 3m (internal measurements) and with a minimum 7 foot door opening, to accommodate larger modern day vehicles. Existing garages attached to properties should not be allowed to be demolished and/or converted into residential accommodation, unless the same amount of parking provision is made available within the curtilage of the property to meet the minimum requirements below. Construction of roads should be a minimum of 7m wide, with at least one, 1m wide pavement.”*

The Council need to robustly justify why they are proposing to make no provision for higher levels of car parking in areas with low Public Transport Accessibility Levels, as this is effectively a departure from the London Plan. In other words, the Council need to provide

robust evidence as to what the circumstances are in the Borough that merits a departure from the London Plan. We also do not understand why the Council are not revising the proposed garage sizes to stipulate a minimum suitable size for modern cars, which have increased in width and height over the past decade. Surely it would make sense to have garages that can be used, to reduce on street parking?

**8) CLP2, Page 3658 - Garden Grabbing;** - Our comment in December 2015, “*Garden Grabbing Policy DM2 (page 18 CLP2) allows “garden grabs” to become much easier. National policy and London policy classifies gardens as greenfield, and there is an assumption against developing on gardens. New Policy DM2 says that the Council will allow building on gardens if “it will complement the local character and biodiversity is protected”. This is totally subjective and so is a much weaker form of protection, and will provide cover for developers to be given planning consent to build on gardens. We oppose making it easier to build on gardens as it will remove green space from our neighbourhood. There should be a presumption against building on gardens.*”

We found the Council’s response unsatisfactory. The National Planning Policy Framework (NPPF) states that “Local planning authorities should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.” This is backed up by the London Plan “Boroughs may in their LDFs introduce a presumption against development on back gardens or other private residential gardens where this can be locally justified.”

The Council’s response says that they have not set such a policy approach (restriction) “as it is not considered that restricting this type of development is justified or could be robustly evidenced.” However, it does not follow that a policy approach permitting back garden development is sound on the basis that the Council cannot provide robust evidence to support a policy that seeks to restrict back garden development. Linked to this, have the Council undertaken any work to assess the potential contribution of back garden development to meeting Croydon’s housing needs, and if so, how have they considered the relevant environmental, social, physical and economic issues? In addition, have they considered a sequential approach where back garden development is only permitted where other sources of land for housing (e.g. brownfield, vacant industrial, windfalls) are demonstrated to be not delivering the level of housing expected from such sources of land on an annual basis?

Other Local Authorities have used the NPPF and/or London Plan to develop robust policy approaches based upon a presumption against development on back gardens – what are the specific circumstances in Croydon (if any), supported by quantified evidence, that demonstrate such an approach is inappropriate and/or cannot be robustly evidenced? Linked to the above, how exactly will the Council make a quantitative judgement that “Garden development will only be permitted where it is in keeping with and subservient to the original dwelling and the surrounding character; a minimum length of 10m and no less than ½ or 200sqm (whichever is the smaller) of the existing garden area is retained for the host property, after the subdivision of the garden; and where there would not be a detrimental impact on existing and future occupants in terms of overlooking and outlook”?

### **Additional Comments**

**9)** Policy DM35.2 (“general support for 3 storey developments across the Borough”): linked to our objection **3)** above, regarding the capacity of areas like Purley to accommodate more growth, what is the evidence to support “increasing the height of developments to 3 storeys across the Borough, subject to high quality design, other policies’ compliance and cumulative impact on community and transport infrastructure”? What is the quantitative evidence that different areas across the Borough have the physical, environmental or infrastructure capacity to accommodate 3 storey developments, and what scale of development would be appropriate?

**10)** Site allocation 490: how does the proposed new primary school on the Brighton Road (Purley) relate to the recent proposal by Riddlesdown Collegiate to bring forward a primary school on their site?

**11)** SP2.5 (p.19) and para 4.7 (p.26) – What is meant by donor sites?

**12)** Site allocation 347 (Tesco’s, 2 Purley Road): “...potential for intensification of use of the site with the addition of residential units which will help to meet the need for new homes in the borough ‘172 to 990 new homes.’” What is the quantitative evidence to support the more intensive use of this site?

Finally we would ask that the Riddlesdown Residents’ Association are allowed to verbally present our objections at the Public Examination.

We hope the Council take on board the above objections and comments.

Yours faithfully

Riddlesdown Residents Association (RRA)