

To:
Spatial Planning Team
Planning & Transportation
Place Department
6th Floor Zone B
Bernard Weatherill House
8 Mint Walk
Croydon CR0 1EA

From:

Tel: 020 8726 6000 Ext: 61385
Minicom: 020 8760 5787
Email: ldf@croydon.gov.uk

Date:

Ref: 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)

Dear Sir/Madam

As a local affected resident, I would like to register my comments and objection to the proposals as documented in the Croydon Local Plans CLP1.1 and CLP2

1 Proposed Policy DM31.4 Focussed Intensification Associated with Gradual Change of the Local Area around Shirley Local Centre, including Wickham Avenue and and Ridgemount Avenue.

I object to the relaxation of the planning regulations to allow the building of significantly larger structures in close proximity to the existing housing stock, comprising mainly bungalows and two storey semi-detached houses in residential roads in the area described as **Shirley Local Centre, i.e. around the Shirley Library**. The promoted character types of: Medium rise blocks with associated grounds; Large buildings with spacing; and Large buildings with strong frontages; in this location would look out of character and is unacceptable. These types of developments in the wrong locations would adversely affect the character of Shirley both now and for future generations.

For the reasons given above:

1. I do not think that the preferred approach is the most appropriate for Croydon to help us meet our Strategic Objectives set out in Section 3.
2. The preferred approach is deliverable, but not acceptable.
3. I do not think the preferred approach enables sustainable development, because it will compromise the ability to meet the needs of future generations.
4. If High density residential accommodation were provided there would be insufficient area for communal open space allocation.
5. The local road network and width could not cope with high residential density proposal and the likely car ownership and on street parking.
6. If these proposals were to become the Croydon Plan adopted policy, it would place Planning blight on all properties as defined in DM31.4. until the year 2036.
7. I recommend that consultation documents of such importance are given much wider publicity.

I do not object to the development plans for the **Shirley Road Shopping Parade** provided that any expansion is along the A232 and does not affect the existing residential areas.

2 Proposed Policy DM2 Development on Garden Land.

The criteria for permitting new dwellings or other development within the curtilage of gardens of an existing dwelling are too weak and do not meet the NPPF instructions to Local Planning Authorities.

The NPPF states at para 48 the Local Planning Authorities should set out policies to 'resist' inappropriate development on garden land – the proposed policies gives guidance which needs to be considered for the 'approval' of development on garden land.

The first criteria, states "It would complement the local character" is highly subjective and unquantifiable.

The second criteria, "where biodiversity is protected" is also too vague and indeterminable to make any informed judgement.

I object to these criteria being used in the determination of acceptable development on garden land, as they undermine the presumption against development on garden land and therefore we ask for stronger positive criteria "to resist" development on garden land to be defined.

The National Planning Policy Framework Para 48 and 53, and the London Plan require Local Planning Authorities to define policies to "resist developments" on garden land. The relaxation of the criteria in Policy DM2 is contrary to this guidance and directions from the NPPF.

For the reasons given above:

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2. The preferred approach is deliverable, but not acceptable.
3. I do not think the preferred approach enables sustainable development, because it will compromise the ability to meet the needs of future generations.
4. Policy DM2 para 4.19 states London's Strategic Housing Land Availability Assessment, which forms the basis of London Plan housing targets for Croydon, assumes that garden land will not be developed. Therefore it is unnecessary to build on garden land to meet Croydon's housing targets.
5. I recommend that consultation documents of such importance are given much wider publicity.

3 Proposed Policy DM10 Design and Character; 10.4 Communal Open Space

I object to the relaxation of allocation of communal open space for residential dwellings of multiple occupation or for flats. The current policy specifies that planning permission will not be granted for residential development unless recreational open space arising from the needs generated by the proposal is provided at a standard of 2.43ha per 1000 people. The new policy at 10.4 only specifies private amenity areas and play space for children. It does not specify communal open space for the number of occupants of a residential development.

The reasons for this objection:

1. The policies for intensification will result in lack of amenity space or communal open space for the residents of future developments of high residential and housing density.
2. The Private amenity space allocations are such that residents will need a measure of communal open space to avoid an overbearing and claustrophobic amenity.

3. Developers will be able to propose developments with minimal community open space allocations and planning officers or the planning committee would not have sufficient ground to refuse those applications
4. We don't want developers concreting over all of Croydon!
5. The current allocation of 2.43ha per 1000 people is appropriate and should be retained.

4 Proposed Policy DM43 De-designation of Metropolitan Open Land around Shirley Oaks Village.

I object to the de-designation of Metropolitan Open Land in the vicinity of Shirley Oaks Road and Shirley Oaks Village. The land should be at least be designated as Local Green Space, for its protection from development.

This open space provides a green corridor between Shirley Oaks and the surrounding areas, and should be retained in its present form.

I also object to the following specific proposals for the building of new homes on this site, as detailed in Changes to the Policies Map arising from Proposals contained within the the Croydon Local Plan: Strategic Policies Partial Review and the Croydon Local Plan, Detailed Policies & Proposals:

Policy DM43, reference Site 128 to build new homes at Poppy Lane

Policy DM43, reference Site 504 to build new homes at Stroud Green Pumping Station (including the conversion of the pumping station which is a locally-listed building)

Policy DM43, reference Site 541 & 542 to build new homes on land to the East & West of Shirley Oaks Road

Policy DM43, reference Site 548 to build new homes on land to the rear of Honeysuckle Gardens

Not only would these developments entail the loss of the green corridor between Shirley Oaks and the surrounding areas, the local road infrastructure would not be able to cope with the additional traffic. Also, the local schools are over-subscribed as well as the already-stretched social and healthcare facilities would be overloaded.

For the reasons given above:

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2. The preferred approach is deliverable, but not acceptable.
3. I do not think the preferred approach enables sustainable development, because it will compromise the ability to meet the needs of future generations.
4. I recommend that consultation documents of such importance are given much wider publicity.

5 Proposed Policy DM43 Development of Under-used Garages and Open Spaces on Shrublands Estate

Policy DM43, reference 938

I am sympathetic to the building of homes on the under-used garages on the Shrublands Estate as detailed in Changes to the Policies Map arising from Proposals contained within the Croydon Local Plan: Strategic Policies Partial Review and the Croydon Local Plan, Detailed Policies & Proposals: reference number 938.

However, I object to the building of any homes on communal open spaces and loss of amenity on the Shrublands Estate.

For the reasons given above:

1. I do not think that the preferred approach is the most appropriate for Croydon to help us meet our Strategic Objectives set out in Section 3.
2. The preferred approach is deliverable, but not acceptable.
3. I do not think the preferred approach enables sustainable development, because it will compromise the ability to meet the needs of future generations.
4. I recommend that consultation documents of such importance are given much wider publicity.

6 Proposed Policy DM43 Creation of Gypsy/Traveller sites at Coombe Farm, off Oaks Road, Coombe Lodge Nurseries, off Conduit Lane and Pear Tree Farm and Pear Tree Cottage, Featherbed Lane

Policy DM43, reference Site 502 Coombe Farm reference Site 661 Coombe Lodge Nurseries and reference Site 755 Pear Tree Farm and Pear Tree Cottage.

I object to the use of any of these locations for the creation of Gypsy/Traveller sites. All three locations are within the Green Belt and one borders a site of Nature Conservation Interest. Such development is in breach of Policy E of Planning Policy for Traveller Sites, which says that "Traveller Sites (temporary or permanent) in the Green Belt are inappropriate development". All three sites are also a considerable distance from public services. I believe that the proposal to create three new Gypsy/Traveller sites now, and 39 by 2036 is excessive and will have an adverse effect on the borough. If the number of Gypsy/Traveller sites really needs to be increased by this amount, then a more appropriate location would be around the existing site at Purley Way. The positioning of a Gypsy/Traveller site adjacent to the car park for Coombe Woods, between the Chateau Restaurant and the Hotel/restaurant, would probably deter me from using any of these attractions.

For the reasons given above:

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2. The preferred approach is deliverable, but not acceptable.
3. I do not think the preferred approach enables sustainable development, because it will compromise the ability of future generations to meet their own needs.
4. I recommend that consultation documents of such importance are given much wider publicity.

I have restricted my objections to those plans that primarily affect the area of Shirley in which I live, but the same objections apply to other proposals in other parts of the borough.

Please confirm your receipt and acceptance of my objections.

Yours sincerely

Name:

Signature: