

Spatial Planning Service
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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)

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 and DM27 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 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.

The plan should be amended to maintain the whole of this land as MOL 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 is no distinction between those 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.

I object to the areas of focused intensification proposed around Shirley Road Shopping Parade and Shirley Local Centre, as proposed by policy DM35.4.

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 areas proposed in Shirley fail to meet these criteria on many levels. The proposed areas are too large covering many residential streets behind the major through routes where intensification would fundamentally change the character of the built environment. The

proposal will add demand to an already struggling infrastructure that does not have sufficient transport capacity in particular (Wickham Road and Shirley Road are already heavily congested and unlike other parts of the Borough Shirley is not served by either the tram or rail network). 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. The intensification zone within the Shirley area also includes properties on the Wickham Road, Hartland Way, Devonshire Way and West Way that have restrictive covenants limiting housing density which potentially make intensification undeliverable. 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 they include only the main roads and do not affect the surrounding suburban streets, thereby reducing the impact on the local infrastructure. The maximum height within the Shirley area should be reduced to three storeys which is in line with the highest current structures.

I object to the policy as worded in DM2 on protecting residential garden land. The policy is worded to 'permit' garden development whereas the NPPF and the London Plan require LPA's to define policies to 'resist' development on garden land. In this respect the policy is not positively prepared, justified or consistent with national policy.

The policy should be re-written to clearly 'resist' residential garden development.

Yours faithfully

Name:

Address:

Postcode:

Email: