

Representation Form for the Croydon Local Plan: Strategic Policies – Partial Review (Preferred and Alternative Options) and the Croydon Local Plan: Detailed Policies and Proposals (Preferred and Alternative Options)

Representations should be returned to Croydon Council at the address overleaf no later than **Friday 18 December 2015**. Please note that whilst comments can be made on any part of the Croydon Local Plan: Detailed Policies and Proposals, if making comments on the Croydon Local Plan: Strategic Policies – Partial Review (Preferred and Alternative Options), only those parts marked as a change in the document form part of this consultation.

Part A

	Personal Details	Agent's Details (if applicable)
Title	Mr	
First Name	Robert	
Last Name	Sleeman	
Job Title (where relevant)		
Organisation (where relevant)	Addiscombe & Shirley Park Residents' Association (ASPRA)	
Address Line 1		
Address Line 2		
Address Line 3		
Postcode		
Email Address	adverts@theaspra.org.uk	
Telephone Number		

I would like to be notified of future consultations on the Croydon Local Plan (please tick this box)	√
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Signature: <input style="width: 300px; height: 30px;" type="text"/>	Date: <input style="width: 150px; height: 30px;" type="text" value="18<sup>th</sup> December 2015"/>
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Croydon Council will acknowledge receipt of your representation(s) as soon as possible. Please note that representations are not confidential and your names and comments may be made available for public inspection during all consultation stages in the preparation of the Croydon Local Plan. Representations sent without a personal or business name and address will not be accepted. Your name and comments submitted to us by may be made available to view online, once your comments have been logged and accepted. We will not publish your address or other contact details in any other public place. You are advised to keep a copy of the representation(s) you submit.

You can download this representation form online at www.croydon.gov.uk/localplanone or www.croydon.gov.uk/localplantwo along with the Croydon Local Plan documents and their supporting evidence. If you have any queries please contact the Spatial Planning Service on 020 8726 6000 or 020 8407 1385, or email ldf@croydon.gov.uk. Please return completed forms via email to ldf@croydon.gov.uk or post to: Spatial Planning Service, 6th Floor Zone B, Bernard Weatherill House, 8 Mint Walk, Croydon, CR0 1EA.

Part B – please use a separate sheet for each representation

1. To which part of the Croydon Local Plan does this representation relate?

Croydon Local Plan: Strategic Policies – Partial Review (Preferred and Alternative Options)

Policy Paragraph Figure/Table

Croydon Local Plan: Detailed Policies and Proposals (Preferred and Alternative Options)

Policy Paragraph Table
 Site number

Changes to the Policies Map arising from proposals contained within the Croydon Local Plan: Strategic Policies – Partial Review (Preferred and Alternative Options) and the Croydon Local Plan: Detailed Policies and Proposals (Preferred and Alternative Options)

Policy Map Site number

2. For each policy or subject please comment on the following questions:

2.1 Do you think that the preferred approach is the most appropriate for Croydon to help us meet our Strategic Objectives set out in Section 3?

YES

It is necessary to have a bigger picture for a place. it recognises landmarks as part of the view.

2.2 Do you think that the preferred approach is deliverable?

YES

In Addiscombe Place – one “view” has been introduced.

There are some listed in the Draft consultation document for East India Conservation Area, and there must be more available from each of our residents association. We repeat this in the Part One of our submission.

2.3 Do you think the preferred approach enables sustainable development?

Sustainable development is defined as being development that meets the needs of the present without compromising on the ability of future generations to meet their own needs.

YES

Yes, because it will create a nice place to look out onto. What more would one want from a place where we live.

3. Please use the box below to make any general or additional comments on the Croydon Local Plan consultation documents or to suggest other options to those presented in the documents. You can also use this box to comment on any of the other key questions set out in the consultation documents.
(Please continue on a separate sheet or expand box if necessary).

The 16 PoC for Addiscombe doesn't consider it needs 'Views and Landmarks'
It should be there in order to recognise Landmarks such as the former Ashburton Library, The Leslie Arms, East India Houses at corner of Addiscombe Road and Clyde Road, Churches and the Cattle Trough. These sit outside DM33 and should be recognised as landmarks.

- d. Are the Tier 2 employment location amendments the most sustainable, reasonable and sound?

YES NO

Please state your reasons: Not relevant

- e. Is including public houses as community facilities sustainable, reasonable and sound?

YES NO

Please state your reasons: Retain and repair local pubs and NEVER again allow demolition of the landmark that was the Black Horse Public House, which has been replaced by an ugly structure that is no longer the heart of the area.

- f. Is including an office retention area for the area around East Croydon Station and New Town within the Croydon Opportunity Area, sustainable, reasonable and sound?

YES NO

Please state your reasons: Not relevant

- g. Do you agree with the Council's methodology for undertaking a Health Impact Assessment of the Strategic Policies?

YES NO

Please state your reasons: Retains human scale and interest in local heritage

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2.1 Do you think that the preferred approach is the most appropriate for Croydon to help us meet our Strategic Objectives set out in Section 3?

YES

It is highly desirable to attain high architectural and design quality in all new development. Being surrounded by attractive development adds so much to the quality of life.

2.2 Do you think that the preferred approach is deliverable?

Questionable.

In the light of experience of the generally dismal quality of domestic architecture in this country since about 1930, the council will have to be very strong with developers to achieve a higher standard. One has only to look at the design of quite recent infilling blocks of flats to see how little has been secured so far. Planners have already allowed the eye-sore that replaced the Black Horse pub and more recently the proposed metal box structure on the corner of Shirley Road and Shirley Avenue.

2.3 Do you think the preferred approach enables sustainable development?

Sustainable development is defined as being development that meets the needs of the present without compromising on the ability of future generations to meet their own needs.

Questionable

3. Please use the box below to make any general or additional comments on the Croydon Local Plan consultation documents or to suggest other options to those presented in the documents. You can also use this box to comment on any of the other key questions set out in the consultation documents. *(Please continue on a separate sheet or expand box if necessary).*

d. Are the Tier 2 employment location amendments the most sustainable, reasonable and sound?
YES NO

Please state your reasons: Not relevant

e. Is including public houses as community facilities sustainable, reasonable and sound?
YES NO

Please state your reasons: Not relevant

f. Is including an office retention area for the area around East Croydon Station and New Town within the Croydon Opportunity Area, sustainable, reasonable and sound?
YES NO

Please state your reasons: Not relevant

g. Do you agree with the Council's methodology for undertaking a Health Impact Assessment of the Strategic Policies?
YES NO

Please state your reasons: Not relevant

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2.1 Do you think that the preferred approach is the most appropriate for Croydon to help us meet our Strategic Objectives set out in Section 3?

YES

The suggested policy for building height and external presentation could maintain the village atmosphere of central Addiscombe. However this does also discourage any large outlets and therefore requires residents to travel (often by car) to Purley Way etc.

There appear to be several traders who are likely to close down, so there is a risk that Strategic Objectives are met but the type of traders no longer provides a suitable service to the local community.

The lack of a Traders' Association is evidence that conditions are below optimum. There is anger that Charity Shops gain preferential treatment for business rates.

2.2 Do you think that the preferred approach is deliverable?

YES

The concern remains that the planning system allowed the demolition of the Black Horse Pub and the erection of an out of character structure. Will these words actually stop a repeat?

2.3 Do you think the preferred approach enables sustainable development?

Sustainable development is defined as being development that meets the needs of the present without compromising on the ability of future generations to meet their

own needs.

NO

The major problem that has precluded development of any large retail outlets is the lack of parking space. This also mitigates against any SME who relies on clients arriving by car.

While Addiscombe Tram stop and bus stops provide good transport links, they are not really suitable for the large weekly shop, or collection of larger items of furniture or white goods.

Delivery of stock to retail outlets often causes parking issues e.g. double parking or parking on zig-zag lines.

The mix of retail outlets has become less attractive, although the multiple Charity shops provide a wide selection of second hand goods. There is no specialist clothing shop for ladies, children's or gents, no haberdashery, no kitchen ware, no furniture, no antiques no artists or bookshop.

Some of these specialist shops do not exist in central Croydon either.

The local traders association has folded so there is minimal coordinated representation to the council.

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Agree strongly that ground floor frontages should remain active and un-obscured. Additionally, however, while the rhythm of the separate individual buildings is attractive and beneficial, it should not preclude separate ground floor units from being joined where this may make a business more viable or where an already successful business may hope to expand. Some of the smaller business units may be too small to practically allow even a small business to successfully operate, with the result that the unit may remain empty, indefinitely, and thereby breaking the rhythm. The safe-guard in retaining the rhythm would be maintained by further guidelines being established in relation to the joining of separate units sympathetically.

Although part of Bingham Road has been shown as a Local Heritage Area (Policy SP4), the damage to several of these properties has already been allowed through multiple occupancy and parking in front gardens. We originally asked for a much wider Heritage Area for Northampton Road, Cheyne Walk, Annandale Road, Carlyle Road, Fryston Avenue, Ashburton Avenue, Whitethorn Gardens, Beech Tree Way, Ashurst Walk. These were all developed under strict covenants from the Ashburton Estate.

- d. Are the Tier 2 employment location amendments the most sustainable, reasonable and sound?
YES NO

Please state your reasons: Not relevant

- e. Is including public houses as community facilities sustainable, reasonable and sound?
YES NO

Please state your reasons: Not relevant

- f. Is including an office retention area for the area around East Croydon Station and New Town within the Croydon Opportunity Area, sustainable, reasonable and sound?
YES NO

Please state your reasons: Not relevant

- g. Do you agree with the Council's methodology for undertaking a Health Impact Assessment of the Strategic Policies?
YES NO

Please state your reasons: Not relevant

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2.1 Do you think that the preferred approach is the most appropriate for Croydon to help us meet our Strategic Objectives set out in Section 3?

YES

In principal this provides a snap-shot of the character of various parts of the neighbourhood.

2.2 Do you think that the preferred approach is deliverable?

YES

Definition of sensitive areas and those where more general development could be allowed is a necessary, if not always popular, mechanism.

2.3 Do you think the preferred approach enables sustainable development?
Sustainable development is defined as being development that meets the needs of the present without compromising on the ability of future generations to meet their own needs.

NO

It has been impossible to obtain timely details of the proposed “intensification” areas. The map defining the area in Addiscombe Place was only made available to me on 15th December 2015 and I still have no maps for the other proposed areas. There

does not appear to be any objective process for selecting these areas and there may be other more suitable sites in the North and South of the borough which have not been included. This appears to be a late addition to the planning and was not published in detail at the start of the consultation period. The maps are not available at: www.croydon.gov.uk/localplanone & www.croydon.gov.uk/localplantwo

3. Please use the box below to make any general or additional comments on the Croydon Local Plan consultation documents or to suggest other options to those presented in the documents. You can also use this box to comment on any of the other key questions set out in the consultation documents.
(Please continue on a separate sheet or expand box if necessary).

The logic behind the choice of areas for place-specific policies is not clear to us. It seems more important to have specific policies to protect areas that have not yet deteriorated but retain unity of architectural and functional character.

There may be more benefit in a plan that shows, in some detail street by street, the type of residential property that makes up the defined types. That way we might identify the density of one, two, three bedroom flats, terraced houses and larger properties not subdivided into flats by location. This could indicate where there is capacity for higher density housing and the related requirement for infrastructure (schools, open spaces, health clinics, shops, transport etc.).

I request a policy on infrastructure (roads, parking, shops, Health facilities and schools) as a compulsory component of developments containing more than 100 dwellings.

- d. Are the Tier 2 employment location amendments the most sustainable, reasonable and sound?
YES NO

Please state your reasons: Impossible to answer given the lack of timely information.

- e. Is including public houses as community facilities sustainable, reasonable and sound?
YES NO

Please state your reasons: Possibly Not relevant

- f. Is including an office retention area for the area around East Croydon Station and New Town within the Croydon Opportunity Area, sustainable, reasonable and sound?
YES NO

Please state your reasons: Probably Not relevant

- g. Do you agree with the Council's methodology for undertaking a Health Impact Assessment of the Strategic Policies?
YES NO

Please state your reasons: These have clearly caused significant stress to residents who suddenly find that their property is earmarked for possible demolition or perhaps compulsory purchase or pressure from builders who will acquire adjacent properties with a view to demolition and higher density building.

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2. For each policy or subject please comment on the following questions:

2.1 Do you think that the preferred approach is the most appropriate for Croydon to help us meet our Strategic Objectives set out in Section 3?

NO Engagement with residents is disgraceful

2.2 Do you think that the preferred approach is deliverable?

NO There are far too many open issues that make it impossible to see how planning policy can be enforced.

Addiscombe Place is not a natural “area” and is an attempt to define a community that does not in reality exist.

It will be an administrative functionality that contradicts the ward boundaries and will disenfranchise the residents.

2.3 Do you think the preferred approach enables sustainable development?

Sustainable development is defined as being development that meets the needs of the present without compromising on the ability of future generations to meet their own needs.

NO There appears to be no metrics by which to judge what is planned against what is actually delivered.

As these “Places” are not natural or current administrative “areas” they cannot engage with

the residents who are thereby forced into such planning blocks. They do not have clear physical or social boundaries and there is little to engender “belonging”. They will fail because the residents cannot identify with such large “areas”.

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This planning exercise appears to be political rather than practical as it fails to engage with the residents. For example in the ASPRA area I have not seen a single response from any resident, as they are clearly confused by the whole process.

The Residents’ Associations are trying to work together to a tight deadline, but are in danger of failing to discuss and reflect resident’s views.

Ward Councillors, the democratically elected representatives, do not appear to have engaged with the residents’ Association or with residents in Ashburton Ward. One councillor in Addiscombe ward has written a short paper. Only the Local MP appears to be supporting the concerns of local residents. This is a shameful way to conduct consultation.

The boundary issues between the “Addiscombe” area and central Croydon are confused by discrepancies between maps where, for example, the Post Office Sorting centre adjacent to East Croydon station appears to be located in two “areas”. From a planning perspective the development of a 20 floor tower block of flats on that site fits well with the regime for central Croydon but is inappropriate for “Addiscombe”. There needs to be a grading the height of structure in the central Croydon “Place” with a limit of 6 stories at the periphery to avoid the risk to homes in Oval Road etc. The current building to the east of East Croydon station is so obviously a threatening and inappropriate scale to housing in Oval Road, Cherry Orchard Road, Cross Road, Leslie Park Road and Lebanon Road to Colson Road.

There is a clear lack of infrastructure (schools, medical facilities, open spaces and community centres) and no available land on which to create the infrastructure. So why allow any further development?

Looking at the area represented by the ASPRA the atmosphere is mainly well built and architecturally individual 1900s to 1930s dwellings with generous gardens and some green space. However there is a lack of school or significant medical centre within the boundary. The western side is being developed into shared accommodation in an unplanned piecemeal scenario, where landlords/freeholders are allowed to make a quick kill on property which is attractive because of the transport infrastructure. Much of the community services are provided by the churches, while the Recreation Ground has been allowed to deteriorate with lack of investment and no restoration of the public toilets. One fears that within the next 30 years much of the property will be of such low energy efficiency that massive redevelopment of higher density homes will be permitted. By then it may be illegal to own a petrol/diesel powered car, so parking will not be the issue it is today.

- d. Are the Tier 2 employment location amendments the most sustainable, reasonable and sound?
YES NO

Please state your reasons: Not relevant

e. Is including public houses as community facilities sustainable, reasonable and sound?

YES

NO

Please state your reasons: Not relevant

f. Is including an office retention area for the area around East Croydon Station and New Town within the Croydon Opportunity Area, sustainable, reasonable and sound?

YES

NO

Please state your reasons: The issues are related to social provision for workers and residents in this high-density development without new roads, schools or health centres.

g. Do you agree with the Council's methodology for undertaking a Health Impact Assessment of the Strategic Policies?

YES

NO

Please state your reasons: Residents and workers are effectively excluded from this discussion.

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2.1 Do you think that the preferred approach is the most appropriate for Croydon to help us meet our Strategic Objectives set out in Section 3?

YES

The planning for car parking is part of the overall London dilemma.

As far as it impacts “Addiscombe” the lack of car parking space, when large older property is converted into multiple flats, blocks roads and junctions and makes it difficult for service vehicles (e.g. street cleaning, gulley cleaning) to gain access. The infrastructure therefore deteriorates and there is a general build-up of rubbish. Of course we will meet the objectives of this policy at a cost to the community. I request a policy on provision of adequate parking for homes converted into multiple occupancy and in intensified development areas block of flats must have adequate parking spaces and include traffic management planning to avoid disruption of existing roads and junctions.

Trams have improved transport and reduced the need for cars but little though was given to the resultant commuter parking near Sandilands and Addiscombe tram stops. The policy makes no mention of the need for car parking facilities near to the transport hubs.

Lack of parking and the introduction of parking restrictions “killed” the excellent Cherry Orchard Road Shopping Parade. People drove from outside the immediate area to access individual high quality shops (Baker, Farm Butcher, Greengrocer, Shoe Repair shop that also worked for Harrods).

I suggest a more positive encouragement of local shopping parades e.g. Cherry Orchard Road,

specifically application for TFL funding as used for our local Addiscombe Shopping Area.

2.2 Do you think that the preferred approach is deliverable?

YES

It will be deliverable where new-builds are concerned.

It does not make any statement about existing housing stock or transport hubs, so these will continue to be a problem but not addressed by this policy.

2.3 Do you think the preferred approach enables sustainable development?

Sustainable development is defined as being development that meets the needs of the present without compromising on the ability of future generations to meet their own needs.

YES

Sustainable for new-builds as the social stigma attached to car ownership increases by 2050.

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(Please continue on a separate sheet or expand box if necessary).

d. Are the Tier 2 employment location amendments the most sustainable, reasonable and sound?
YES NO

Please state your reasons: Not relevant

e. Is including public houses as community facilities sustainable, reasonable and sound?
YES NO

Please state your reasons: Not relevant

f. Is including an office retention area for the area around East Croydon Station and New Town within the Croydon Opportunity Area, sustainable, reasonable and sound?
YES NO

Please state your reasons: Not relevant

g. Do you agree with the Council's methodology for undertaking a Health Impact Assessment of the Strategic Policies?
YES NO

Please state your reasons: Not relevant

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2.1 Do you think that the preferred approach is the most appropriate for Croydon to help us meet our Strategic Objectives set out in Section 3?

YES

The development of dwellings on gardens has been ongoing in “Addiscombe” and in general has produced property that does not detract from the neighbourhood.

However as the housing stock in “Addiscombe” deteriorates and drops below required energy efficiency standards there will be re-development. This policy does not appear to address the planning regime when multiple large older properties are demolished and higher density development using more of the garden space for dwellings is proposed.

2.2 Do you think that the preferred approach is deliverable?

YES

In the north of “Addiscombe” where there is little opportunity to build in back gardens this will work well.

In the south of “Addiscombe” higher density housing will be possible by building on gardens. The wording of the policy does not add any teeth to stop infill and garden development where there is a planning gain by the provision on additional housing (and significant profit for the land owner and developer). It needs to be more specific by street to provide guidance to residents and developers.

It should define which areas will not be protected by this policy.

2.3 Do you think the preferred approach enables sustainable development?
Sustainable development is defined as being development that meets the needs of the present without compromising on the ability of future generations to meet their own needs.

YES

It will be self-fulfilling in “Addiscombe” where large areas to the north are unsuitable for this sort of development.

The south of “Addiscombe” will not be afforded significant protection from in-fill.

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It is not at all clear where this policy covers land surrounded by back gardens. Specifically there needs to a presumption against the proposed development behind 1-19 Craven Road. This policy would also apply to the proposed “intensification” area which will border back gardens in Peabody Close, Shirley Avenue, Valley Walk, Barnfield Avenue, Craigen Avenue and Greencourt Avenue. This should also apply to other such area for which I have not yet seen detailed plans.

- d. Are the Tier 2 employment location amendments the most sustainable, reasonable and sound?
YES NO

Please state your reasons: Not relevant

- e. Is including public houses as community facilities sustainable, reasonable and sound?
YES NO

Please state your reasons: Not relevant

- f. Is including an office retention area for the area around East Croydon Station and New Town within the Croydon Opportunity Area, sustainable, reasonable and sound?
YES NO

Please state your reasons: Not relevant

- g. Do you agree with the Council's methodology for undertaking a Health Impact Assessment of the Strategic Policies?
YES NO

Please state your reasons: Not relevant

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2.1 Do you think that the preferred approach is the most appropriate for Croydon to help us meet our Strategic Objectives set out in Section 3?

NO

The inevitable conclusion is that older property will become substandard by the poor quality sub division into flats that has escalated in the last 20 years in “Addiscombe”.

The policy offers little protection against demolition and re-development as blocks of flats. It should be appropriate to the area by mass/height/spacing.

2.2 Do you think that the preferred approach is deliverable?

YES

It will be deliverable because of the need for cheap housing close to the East Croydon transport hub. Land owner and developers can be expected to fuel such development with the generous profit margins.

Increase of density means decrease in quality of living.

The council is stating the obvious, but not providing protection for the residents who will see deterioration in their quality of life.

Some residents will see this as an attractive investment plan.

The logic behind the choice of areas for place-specific policies is not clear to us e.g 29.2. It seems more important to have specific policies to protect areas that have not yet deteriorated but retain unity of architectural and functional character.

2.3 Do you think the preferred approach enables sustainable development?
Sustainable development is defined as being development that meets the needs of the present without compromising on the ability of future generations to meet their own needs.

NO

It seems inevitable that older housing stock will be redeveloped under this policy. This will compromise the village atmosphere of the ASPRA area of "Addiscombe". It is likely to destroy the atmosphere of the Whitgift Estate.

If the character and quality of the Whitgift Estate is to be preserved, it is essential that the restriction in the covenants to one detached house per plot is maintained through the planning process and, further, that subdivisions are not permitted. This does not prevent substantial extensions, in sympathy with the surroundings, such as have occurred and are occurring.

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You mention "sustainable communities"? How would you define them?
In simple words we need good quality housing, with amenities. This is not how majority perceives their neighbourhood. We are not feeling safe.

Please add to Option 1

c. Requiring that in any identified community, for all development, consideration must be given for the provision of or enabling the provision of facilities essential to a sustainable community e.g schools, child care provision, health care centres, green spaces, recycling resources

d. Are the Tier 2 employment location amendments the most sustainable, reasonable and sound?
YES NO

Please state your reasons: Not relevant

e. Is including public houses as community facilities sustainable, reasonable and sound?
YES NO

Please state your reasons: Not relevant

f. Is including an office retention area for the area around East Croydon Station and New Town within the Croydon Opportunity Area, sustainable, reasonable and sound?
YES NO

Please state your reasons: Not relevant

g. Do you agree with the Council's methodology for undertaking a Health Impact Assessment of the Strategic Policies?
YES NO

Please state your reasons: Not relevant

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2.1 Do you think that the preferred approach is the most appropriate for Croydon to help us meet our Strategic Objectives set out in Section 3?

NO

This proposal for De-designation of Metropolitan Open Land is strongly opposed. The Open Spaces Society have objected, stating that if development were allowed in these areas it would be detrimental to the amenity value of the area for the benefit of the public.

2.2 Do you think that the preferred approach is deliverable?

NO

There is no need to de-designate unless the ulterior motive is to allow development to infill the released areas.

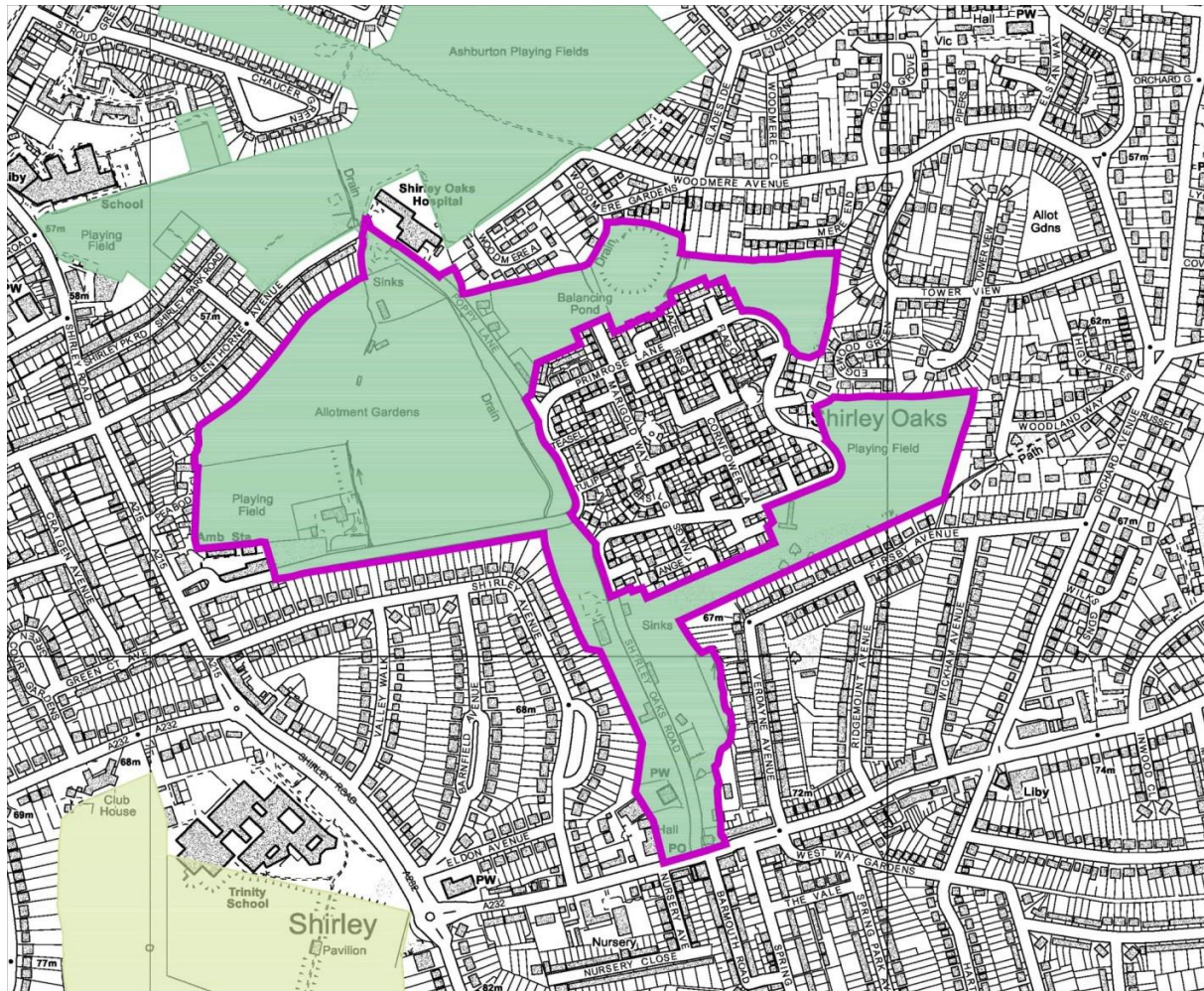
2.3 Do you think the preferred approach enables sustainable development?
Sustainable development is defined as being development that meets the needs of the present without compromising on the ability of future generations to meet their own needs.

NO

Removal of green space for air and exercise followed by high density development compromises the needs of current and future generatins to use this metropolitan Open Land. It must remain protected.

3. Please use the box below to make any general or additional comments on the Croydon Local Plan consultation documents or to suggest other options to those presented in the documents. You can also use this box to comment on any of the other key questions set out in the consultation documents.
(Please continue on a separate sheet or expand box if necessary).

de-classification of Metropolitan Open Land. – un-titled map



The fact that this map has been tacked on the end and is not titled or numbered suggests a last minute change to policy without due process. It appears both underhand and vindictive and probably designed to allow high density development that does not appear to be documented at this stage. There is no explanation why this Land does not meet the criteria for designation as Metropolitan Open Land. I have not found any discussion of this proposal in the Knight Kavanagh & Page report of August 2009:

<https://www.croydon.gov.uk/sites/default/files/articles/downloads/osneeds-standards.pdf>

- d. Are the Tier 2 employment location amendments the most sustainable, reasonable and sound?
YES NO

Please state your reasons: Not relevant

- e. Is including public houses as community facilities sustainable, reasonable and sound?
YES NO

Please state your reasons: Not relevant

- f. Is including an office retention area for the area around East Croydon Station and New Town

within the Croydon Opportunity Area, sustainable, reasonable and sound?

YES

NO

Please state your reasons: Not relevant

g. Do you agree with the Council's methodology for undertaking a Health Impact Assessment of the Strategic Policies?

YES

NO

Please state your reasons: This proposal will reduce open land used for fresh air and recreation and with the planned housing development will increase pollution.

Part B – please use a separate sheet for each representation

1. To which part of the Croydon Local Plan does this representation relate?

Croydon Local Plan: Strategic Policies – Partial Review (Preferred and Alternative Options)

Policy Paragraph Figure/Table

Croydon Local Plan: Detailed Policies and Proposals (Preferred and Alternative Options)

Policy Paragraph Table
 Site number

Changes to the Policies Map arising from proposals contained within the Croydon Local Plan: Strategic Policies – Partial Review (Preferred and Alternative Options) and the Croydon Local Plan: Detailed Policies and Proposals (Preferred and Alternative Options)

Policy Map Site number

2. For each policy or subject please comment on the following questions:

2.1 Do you think that the preferred approach is the most appropriate for Croydon to help us meet our Strategic Objectives set out in Section 3?

NO
 Difficult to judge if there has been any reference to national policy.

2.2 Do you think that the preferred approach is deliverable?

NO
 Difficult to judge if there has been any reference to national policy and recommendations on metrics to measure success..

2.3 Do you think the preferred approach enables sustainable development?
 Sustainable development is defined as being development that meets the needs of the present without compromising on the ability of future generations to meet their own needs.

NO
 Distribution across 3 sites in the South East of the borough does not seem to address need in the North and West of the borough. It may however be better to provide a larger site with easy access to education, health services and transport in the next 5 years with additional sites provided in later years if necessary. What is currently proposed has impact on areas used for air and exercise by a large number of residents.

3. Please use the box below to make any general or additional comments on the Croydon Local Plan consultation documents or to suggest other options to those presented in the documents. You can also use this box to comment on any of the other key questions set out in the consultation documents.
(Please continue on a separate sheet or expand box if necessary).

Hidden in the depths of the documents without any detailed maps and no backing documentation are plans to allocate Traveller sites:
Addington, Shirley, South Croydon

Ref no	Site name	Proposed use
755	Pear Tree Farm & Pear Tree Farm Cottage, Featherbed Lane	Gypsy and traveller site
502	Coombe Farm, Oaks Road	Gypsy and traveller site
661	Coombe Lodge Nurseries, Conduit Lane	Gypsy and traveller site

There is no reference to any national mechanism for rating such sites, so has Croydon invented a scoring regime without any accreditation?

https://www.croydon.gov.uk/sites/default/files/articles/downloads/Gypsy%20and%20Travellers_Site_search_Evidence_%20August_2015.pdf

I call for a review including increased weighting for needs for transport, education and health facilities for all sites suitable for 15 + pitches with site area greater than 4.0:

Number	ID	Site Area	Nos of pitches at 500 m ² each
15	Kent Gateway Lane ,Featherbed Lane,Selsdon,CR0 5AR	13.7	15+
536	Land of former Croydon Airport runway- south of Imperial Way,Purley Way,Waddon,CR0 4RR	4.5	15+
553	By Pavilion, Playing Fields,Purley Way, Waddon,	39.0	15+
632	Land south of Threehalfpenny Woods, Kent Gate Way, Bridle Way, Addington, CR0 5AH,	4.4	15+
635	Land adjoining Kent Gateway East of Addington Village Roundabout ,Kent Gateway, Lodge Lane,Addington,CR0 5AR	25.1	15+
636	Land west of Timebridge Community Centre, Lodge Lane,Elmside, Addington CR00QA	7.4	15+
651	Land south of Heathfield,Riesco Drive, Selsdon, CR0 5RS	4.9	15+
661	Coombe Lodge Nursery (Central Nursery), Conduit Lane ,Coombe Road, South Croydon, CR0 5RQ	4.2	15+

d. Are the Tier 2 employment location amendments the most sustainable, reasonable and sound?
YES NO

Please state your reasons: Not relevant

e. Is including public houses as community facilities sustainable, reasonable and sound?
YES NO

Please state your reasons: Not relevant

f. Is including an office retention area for the area around East Croydon Station and New Town within the Croydon Opportunity Area, sustainable, reasonable and sound?
YES NO

Please state your reasons: Not relevant

g. Do you agree with the Council's methodology for undertaking a Health Impact Assessment of the Strategic Policies?

YES

NO

None of the 3 proposed sites offer easy access to health facilities for Traveller families

For Heritage and Conservation, Community Facilities and Biodiversity, please comment on the following questions:

- 3.1 As part of the preparation of the emerging Croydon Local Plan- Detailed Policies and Proposals the council will be reviewing local heritage areas (designated as Local Areas of Special Character in the Croydon Local Plan: Strategic Policies). Are you aware of any areas of heritage significance within the borough that may be worthy of local designation?

YES NO

Please state the name of the place, address or nearest street or road to the area, as well as your reasons:

The majority of housing stock on the Addiscombe Road, the majority of the Whitgift Estate, Ashburton Avenue.

The Addiscombe Road is an artery leading into central Croydon and needs to be retained and protected to avoid the damage done to properties on other arteries, particularly to the north. The Whitgift Estate contains some individual properties of architectural merit. It has an ambience unique within this part of Croydon.

- 3.2 It is intended for the council to undertake periodic reviews of the local list of buildings or architectural or historic significance. Do you have any recommendations for inclusion on this list?

YES NO

Please state the address of the building, as well as your reasons:

Carlyle Road, Cheyne Walk, Whitethorn Gardens, Ashburton Avenue,

The first 3 roads contain fine examples of substantial Edwardian housing that has not in general been sub-divided.

Ashburton Avenue is of historic and literary interest through the work of Delderfield. It contains fine examples of terraced housing with many retaining their period architectural detail. It is in danger of destruction by inappropriate window replacement and loft conversions.

- 3.3. Are you aware of any sites that are not currently protected as Sites of Nature Conservation Importance that may be worthy of protection?

YES NO

Please state the name, address or nearest street or road to the area, as well as your reasons:

- 3.4 Do you think that the council's preferred approach is the most appropriate for the development of new community facilities as detailed in paragraph 7.7?

YES NO

Please state your reasons:

We are more likely to maintain community facilities, where the users have made significant investment. This has been demonstrated by the Faith communities in "Addiscombe".

4. Please use the space below to make any general or additional comments on the Croydon Local Plan: Detailed Policies (Preferred and Alternative Options).

Continue on a separate sheet as necessary.

The document, like the previous UDP, is very impenetrable to many residents.

The timescale to respond has not allowed for significant consultation or public meetings.

It is difficult to identify policy details in this set of documents.

It is difficult to understand the implication of one set of policies against another, particularly where planning relates to districts outside the central area but there is a buffer zone adjacent to the central area where different policies will be implemented.

The exercise has given us little confidence that residents will be able to make representation through their elected councillors and therefore we have been effectively disenfranchised from the process.