

To Spatial Planning

London Borough of Croydon
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Dear Sir or Madam

Evaluation of the Croydon Local Plan Review 2019 - 2039

A perspective on the soundness of the Plan

Please find the joint response to The Regulation 19 consultation on the proposed submission of the Croydon local plan 2019 to 2039 from the four Coulsdon Residents' Associations: East Coulsdon RA (ECRA), Old Coulsdon RA (OCRA), Hartley and District RA (HADRA) and Coulsdon West RA (CWRA) who between us represent all of the residents from various parts of Coulsdon.

We would like to see the following changes and amendments as requested by The Coulsdon Residents' Associations in the south of the Borough.

1 Historical context: The promise of new horizons

1.1 The completion of the Coulsdon bypass ('Farthing Way') in 2006 provided a real opportunity to reshape the town centre for the future. The Residents' Associations welcomed this with "Coulsdon Means Business", a 20-page directory of local commerce and business that we published when the bypass first opened. At the same time, as part of a programme of regeneration, trees were planted, street furniture installed, the town centre road surfaces improved. For a short period, the council even seconded a Town Centre Manager to help regenerate shop frontages – part of a "Coulsdon Area Regeneration Strategy". The future looked good. But all this momentum ground to a halt a decade ago. The plans for the relocation of Waitrose to Lion Green, a health centre, a memorial to the Iron Railway, even a leisure centre/swimming pool have all failed to materialise under Council supervision.

1.2 The building of the bypass, and the extensive housing development on Cane Hill, did lead to investment in and upgrading of the railway stations at Coulsdon South and Coulsdon Town. Local bus services were also improved. Major car showrooms opened close to the bypass, and shops in Coulsdon town centre were able to continue trading while other local shopping areas in Croydon struggled, but overall the opportunity was lost.

Progress turns negative

1.3 A few years ago, house building in Coulsdon (aside from the Cane Hill development) amounted to the usually measured filling in of the few remaining vacant sites with detached or semi-detached dwellings in keeping with the area's prevailing character. Now, provision has turned into a headlong rush to greatly intensify land use in long-established residential areas by demolishing houses with large gardens, replacing them with flats in various combinations, and planning decisions flying in the face of intense and justified local opposition.

1.4 This trend seems fuelled by two imperatives. A government dictat that Greater London's housing annual output should rise from 65,000 to 100,000; and separately, that the London Gatwick Transformation Corridor offers significant scope for business expansion. The council's firm adherence to both policies helps to explain its own policy towards housing development; and land use more broadly. Over a quarter of Croydon's intensification will be in Purley and Coulsdon: 8,000 out of 28,000 dwellings at current reckoning.

1.5 New towns, and town expansion schemes, as the long-established approach to help "level up" Britain have been wholly abandoned. Central government policy now is that London's population should be allowed to grow to over 11m, with freeports the preferred alternative to decentralisation. The Mayor of London would seem to agree, saying 'levelling up' must not be at the expense of London.

1.6 Coulsdon town centre needs continued support with free, on-street, parking and encouragement to increase the tenant mix. All but one of the banks have closed. The contrast with nearby Wallington in neighbouring Sutton is marked. However, Coulsdon remains a major centre of employment and continues to have both a viable town centre and a strong sense of community.

The above analysis shapes the views we wish to express in detail about the Council's plan to set Coulsdon's future to 2039.

2 Housing Targets

- 2.1 Croydon, through the Local Plan and the London Plan, are required by national government to set housing targets and show how these can be met. However, the figures used in Croydon's Local Plan are out of date.
- 2.2 The New London Plan adopted in March 2021 gives Croydon a target of 32,000 dwellings to be built by 2039, rather than the 46,000 as stated in Table 1. This is a significant reduction. Housing required across all areas should be reduced proportionately which means Coulsdon's share would be reduced from 2,160 to 1,503 dwellings in Table 4.1. Table 1 and table 4.1 therefore do not comply with the London Plan.
- 2.3 Data post-Brexit and post-Covid shows that the current housing need, in the capital, is overstated and that Croydon is already ahead of target. These considerations should be taken into account and the figures for required housing need to be flexible, and adjusted as new evidence becomes available.
- 2.4 Housing is not simply a numbers game. There should be a viable mix of dwellings within Coulsdon to maintain a sustainable mixed community. If there is a shortage in the area, it is of affordable 2–3 bedroom houses with private gardens where children can play safely, and not flats.
- 2.5 Coulsdon has already seen recent, large-scale, development. Cane Hill (684 dwellings) is clearly the largest of these, but the town centre too has also seen significant development with sites at Lion Green Road (154), Smitham Yard (84), Leaden Hill/Station Approach (86), Plumb Centre (28), Lloyds Bank (18), Nat West Bank (17), and South Drive (18 with an application for an additional 40). These developments were either completed after the start date of this Local Plan review or left out of it, so they should be deducted from the required housing figure.
- 2.6 There has been significant development on windfall sites (On Reddown Road, 20 additional dwellings have been consented to or completed since 2019 – with an additional 79 dwellings in the last 10 years), Fairdene Road (19), Woodcote Grove Road (34), and Edward Road (9), to name but a few. The majority of these comprise small flats. Changing market conditions (including increased working from home, a result of the Covid-led move to hybrid working) has resulted in an oversupply of one-bedroom flats. Some properties have remained empty for several years (the flats at Leaden Hill being an example of this, as well as the one-bed flat conversions on Reddown Road).

2.7 The number of dwellings already built or consented to during the life of this Local Plan are already in excess of 1,200. We believe the plan should be more rigorous about the types of development that it supports. Coulsdon has already undergone the intensification that is required. Any future development needs to be constrained to the actual need for smaller affordable family houses with private gardens.

3 Basic support Infrastructure

3.1 Sewage and flood risk

The existing waste water/sewage infrastructure in Coulsdon is already unfit for purpose, in desperate need of extensive repair and enhancement. It is incapable of operating during periods of heavy or protracted rainfall, and this is becoming increasingly frequent. Coulsdon has suffered three “once in a hundred years” events of excessive rain in the last 12 months. As recently as 27th January 2022, during a month that has seen far below average rainfall, a sewer burst in Hadleigh Grove, flooding the area around Balmoral House with raw sewage. In addition, Caterham Drive in Old Coulsdon and Chipstead Valley Road, Brighton Road and Portnalls Road in Coulsdon have all suffered recent critical failures, with areas being flooded, causing significant vehicle and property damage and contaminating gardens.

Developers should pay towards the cost of improving the sewage infrastructure before planning permission is granted. The Planning Department should work more closely with Thames Water to ensure this. A joint investigation between Croydon and Thames Water should establish exact infrastructure requirements for the existing need prior to accepting permissions for further development.

Infrastructure must be put in place prior to planning permission to cope with flood and sewage issues. The local plan states that “*some areas of intensification are within flood areas and with proper design, risks can be overcome*”, but we believe the Local Plan must be more robust and implement flood alleviation schemes prior to granting planning permission.

3.2 Health Services

Health services should be further prioritised and development constrained until adequate facilities are provided. We have lost two GP practices in the last three years and the number of residents over the age of 55 is set to increase by 63 % over the plan period, with rising percentages of the infirm / disabled and unwell. Facilities must be put in place to cope with this pressure. The planned Medical Centre on the old CALAT Centre/Malcolm Road site is a step in the right direction, but has taken years of negotiation. Provision for the anticipated needs of the area must be set in motion now.

3.3 Recycling

Given the increase in density that has already taken place, recycling facilities should be enhanced, not diminished or removed/relocated to sites far from the area. The Purley Recycling Centre should be retained and the traveller site identified in the previous local plan adjacent to this facility should not be extended to include the Recycling Centre. The Council has confirmed a mistake has been made on the description and drawing of the boundaries of site 324 and that the existing recycling centre will be excluded from site 324 (as per the previous Local Plan) and it is not intended that the Purley Recycling Centre should be included in the boundaries of the proposed traveller site.

3.4 Transport

With increases in density having already taken place, existing transport services need to be brought back to pre-Covid levels and enhanced to meet the Local Plan's targets for lower car use, pollution and road traffic congestion. Public Transport needs to be reliable, regular and cheap in order to meet these objectives. Although we are in full support of initiatives to promote the greater use of cycling, the topography of the area presents challenges to widespread adoption, and expectations should be modified accordingly.

3.5 Schools

With the significant increase in population in recent years, pressure has been placed on local schools to cope with more students without a commensurate increase in facilities or funding. Again, you should not be approving development without first ensuring there is educational capacity locally.

3.6 Youth Facilities

There are no proper facilities for older children in the South of the Borough. We believe that the provision of leisure facilities for young people should be prioritised in Coulsdon, for example, the development of a pool, a youth club and a Skatepark. The existing leisure centre in Purley should not be allowed to be redeveloped without an adequate replacement within the Coulsdon/Purley area being provided first.

4 Proposals regarding Moderate and Focussed Intensification within Coulsdon

4.1 We believe a step has been missed in designating areas for moderate and focussed intensification. The evidence relied has not been updated as required under Regulation 19 but is based on data gathered before 2013. Coulsdon has undergone significant changes since then.

4.2 The London Plan requires fewer than 300 additional homes to be built in Coulsdon over the next 17 years and we submit that this figure needs to be lowered when data is available on actual housing need post-Brexit and post

Covid. Coulsdon has no need for any areas to be designated for moderate or focussed intensification. Such numbers of additional dwellings should be able to be provided following a natural evolution of scattered windfall sites within the area.

5 Proposed Moderate intensification areas within Coulsdon

5.1 These areas should be removed from the classification of moderate intensification. The number of houses required to be built in Coulsdon to meet the housing target set out in the London Plan 2021 is less than 300 over the next 17 years and therefore does not require any such area to be classed as an area of moderate intensification. We set out our amendments to the new definition of Moderate Intensification in Appendix 1.

5.2 **Reddown Road, Fairdene Road up to Moorsom Way:** This area is comprised of a range of properties dating from the Victorian / Edwardian period to present day. Over the last 10 years it has incurred greater than moderate intensification with the construction of 100 new properties, nearly all of them flats. Any development in this area should be required to respect the protected views from Farthing Downs to Cane Hill.

5.3 **Hartley Old Road, Hartley Way, Byron Avenue:** This area, although not far from a local bus route, rises quickly out of the valley and is an area unsuitable for intensification without adequate parking; as the elderly, disabled and young families are reliant on cars to access the town centre and local schools. In addition, these roads are PTALs 0-2 and in excess of 800 metres from a railway station, so the proposed moderate intensification is in breach of the London Plan H2 small sites policy, paragraph 4.2.4.

6 Proposed Focussed intensification area within Coulsdon

6.1 In order to achieve the housing target set by the London Plan 2021, only 300 dwellings (See 2.2) need to be built by 2039. Because of this, there is no requirement for **any** area within Coulsdon to be classified as an area of focussed or moderate intensification, and as such, this area should be removed from the classification of focussed or moderate intensification. Regardless, it has been marked as one area on the plan, when in reality it is divided into two distinct sections.

6.2 **Woodcote Grove Road, The Avenue, The Grove and South Drive:** These are residential roads quite separate from the town centre and have been subject to intensification in previous local plans. They contain a mixture of properties from detached, semi-detached, maisonettes, flats and bungalows, providing an excellent mix of homes suitable for an extensive range of households. We have particular concerns regarding the

intensification of South Drive which is long cul-de-sac with no adequate turning circle. Large service vehicles, including refuse trucks, are unable to turn round and are forced to reverse in and out of the road. Development and building of properties with insufficient off-road car provision will simply exacerbate existing difficulties.

6.3 Woodcote Grove Road, Woodmansterne Road, Julien Road, Southwood Avenue and Bramley Avenue: These roads contain larger, well-built detached and semi-detached attractive houses with medium sized gardens suitable for families. The more expensive houses are important to the area so as to maintain a balance of population and are not suitable for Focused intensification.

6.4 We have set out our suggestions for amendments to the definition of Focused Intensification in Appendix 2.

7 Other sites identified in the Local Plan

7.1 Coulsdon Town Centre - Brighton Road, Edward Road, Victoria Road, Station Approach Road, Lion Green Road, Malcolm Road and Chipstead Valley Road: On completion of Lion Green development in November 2022, this area will have undergone major intensification, with just over 500 new flats created along with a small number of terraced houses.

The existing properties on these roads are a mixture of Victorian and 1930's terraced houses with small gardens. These are very important to the balance of population in Coulsdon, as, being priced at the lower end of the housing market, they are ideal for small families or people who need to down-size or relocate closer the town centre and its amenities.

7.2 Site 372: Lion Green Road: This site now has a reconfigured car park essential for the survival of the town centre's businesses and retailers. The 154 flats in five blocks adjacent to this site are nearing completion, so this should be clearly indicated in the Local Plan as unsuitable for further development.

7.3 Site 945: Waitrose Supermarket: Waitrose have confirmed that their supermarket is remaining on this site with its existing car park. This high-end retailer is a key part of the identity of Coulsdon's High Street, especially with the falling away of so many of the 'high street' banks. It is also important shopping anchor, helping to maintain footfall in this northern part of the town centre. This site should therefore be categorised as retail in order to serve the increased local population and provide them with the option of shopping locally.

- 7.4 Sentinel House, 163 Brighton Road.** This eighties-built office building with 31 car parking spaces represents an excellent business/commercial opportunity in the centre of Coulsdon, and its location allows it to take advantage of both railway stations. As we move away from the restrictions imposed by Covid, it should be able to take advantage of the move to hybrid working and provide an out of town hub or HQ facility for a sizable company. We feel it should retain its existing status and not be considered for conversion to residential purposes for which its construction/design is ill-suited.
- 7.5 Land at the bottom of the Cane Hill site at the junction of Brighton Road and Lion Green Road:** At present this area is designated for commercial use. However, with no viable commercial offer yet made, it may be appropriate for the site to be re-designated for community use, or housing, particularly if used to provide accommodation for the disabled or the infirm due to its location on level ground close to the town centre.
- 7.6 Heritage areas:** We strongly support Dunstan Cottages in Chipstead Valley Road, The Dutch Village, the cottages on Station Approach and Stoats Nest Village as being designated Heritage areas. In addition, although Marlpit Farm is locally listed, it has been left empty for several years and is in danger of serious structural deterioration. This building should be protected and brought back into use as a family home.
- 7.7 Conservation Area:** We strongly support Bradmore Green remaining a Conservation Area.
- 7.8 Purley Leisure Centre:** We believe the facility, with its swimming pool, gym and car parking, provided amenities unique to this part of the borough, which otherwise suffers from a lack of adequate leisure provision. Its central location, allowing access by train and bus as well as private transport from all parts of Croydon is ideal. It has, vitally, enabled local schools to teach their students to swim as part of the national curriculum. As such, the Centre should be designated a community asset, not closed.
- 7.9 Recycling Centre, Purley Oaks:** This site plays an important part in complying with Croydon's recycling and other 'Green' commitments. Rather than threatened with closure, it should be protected, especially with the increase in population. The proposed alternative site at Factory Lane is inappropriate given that it forces residents to use their vehicles more, not less, and would create greater road congestion as users are forced to travel to central Croydon.

7.10 Community Green Spaces

7.10.1 **Marlpit Lane Memorial Park and Grange Park:** Have both been declared “**Fields in Trust - Centenary Fields**” because of their war memorials and are designated as a ‘Registered Open Space Protected Historic Park’ and gardens within the Review of the Local Plan and should remain as such.

7.10.2 **Rickman Hill Park and Mother Kitty’s Shaw:** This park has no existing protection under the Local Plan. However, Mother Kitty’s Shaw is an area of Ancient Woodland within the boundaries of the park and both have been proposed for inclusion in the extension of the Surrey Hills Area of Natural beauty (AONB). We believe that this park should also be designated as a Registered Open Space Protected Historic Park and Gardens within the review of the Local Plan.

All three parks are well used for many leisure purposes by people of all ages. However, there are few facilities for children in the 11- 18 age range in any of the parks or the surrounding areas and this lack of infrastructure should be addressed.

7.11 **Landmarks:** Coulsdon Methodist Church Brighton Road should be added to the recognised landmarks.

7.11 **Views:** The view from Farthing Downs to Central London should be added to views to be preserved.

7.12 Protected Industrial and District Centres

According to our records, we have some 276 different retail and industrial units in Coulsdon. So we welcome the Local Plan’s acknowledgement of the importance of retaining Coulsdon’s district centre and the retail opportunities that it proposes and we believe that this area would be best protected by the implementation of an **Article 4 Direction** preventing any further loss of retail space.

We also welcome the continued protection of the Ullswater Industrial Estate as an important employment zone in Coulsdon. However, we would like to see greater flexibility in the forms of employment use on the estate, moving away from the purely industrial, in order to attract a wider range of business and commercial interests to Coulsdon. Proposals could perhaps be approved on a case-by-case basis, and these could include health and community uses where the employment is equivalent or above that of an industrial purpose.

Yours Faithfully

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Appendix 1: Changes to the Definition of Moderate Intensification

1.1 Moderate Intensification

- 1.1.1 We note that the previous definition in the local plan of moderate intensification was the development of 1 in 285 or 1 in 280 properties in any area per year.
- 1.1.2 A number of areas identified for moderate intensification are based on their proximity to railway stations rather than the needs of the local population and housing. Emphasis should be placed on enhancing the character of that which exists in the local area currently.
- 1.1.3 We suggest amendments to the definition of moderate intensification (our changes in red and bold):-

“DM10.11c Developments within the areas of moderate intensification should be larger than the existing by delivering at least an additional storey. The increasing density should:

- a) Respect and enhance the character of the area and*
- b) Provide amenity and communal facilities for intensified use including utilities infrastructure, play space, landscaping, parking, cycle storage and, refuse storage within the capacity of the site.*
- c) Increase the amount of accommodation suitable for families with private amenity space.***

*6.62b Moderate intensification will see developments that reasonably increase density in a way that positively responds to the local context and seeks to reinforce and enhance the existing predominant character. Developments will be scattered throughout areas, with a gradual change over time where the level of intensification will be limited by access to transport links, shops and green space. **Planning consent may be refused if the cumulative impact of development would mean that the predominant character of an area is lost.***

*6.62c In areas of moderate intensification shown in the policies map, new homes may be created by replacement of the existing buildings (including the amalgamation of sites) or the creation of new streets (such as a Mews development across multiple back gardens). Developments will increase the density and massing, within the broad parameters of the existing local character reflected in the form of buildings and street scene **and layout in particular and any replacement buildings will provide accommodation for the same size of households as the buildings that they replace.***

6.62d *Moderate No* intensification will ~~not~~ take place within in a Conservation Area or Local Heritage Area. Developments will have good access to services and public transport meaning either: 1. It is within 800m of Croydon Metropolitan Centre or a Town Centre designated as a District Centre in the London Plan; 2. It is within 800m of a Local Centre, Neighbourhood Centre or Shopping Parade and it is an area with a PTAL of 3 or above; or 3. It is within 800m of a Local Centre, Neighbourhood Centre or Shopping Parade and within 800m of a train or tram stop.

6.62e To accommodate growth which would complement the existing individual character of Places of Croydon and improve efficiency of land use, the Council promotes intensification by delivering at least an additional storey. The developments in the moderate intensification areas are required to provide amenities on the site in accordance with the guidance in the supplementary planning document.”

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Appendix 2: Our amendments to the definition of Focused Development

- 1.2 The area identified for 'focussed development' is to the North of Coulsdon Town Centre. This area is completely inappropriate for focussed or even moderate development. The area is comprised of narrow roads of smaller family homes, on the side of the valley which quickly become inaccessible to families or the infirm via public transport. The main Woodcote Grove Road which leads out of the valley has (within the lifetime of this revision to the local plan) undergone "moderate to focussed intensification". There are not many side roads off this main road which are suitable for similar intensification.
- 1.3 South Drive, for example, is a narrow, dead-end road with no useful turning areas. The waste collection lorry has to reverse into the road to pick-up from the existing residences. We fail to see the benefit in seeking to intensify the development of an area which is already predominantly dense, small family, housing.
- 1.4 We cannot see that identifying this area for focussed intensification would result in more development than is naturally occurring with windfall sites becoming available. The majority of properties in this area are so small that any attempt to change the character of the area would not be viable without causing severe distress and loss of amenity to the neighbouring properties. Displacing people from small family homes in order to build smaller family homes serves no purpose. In particular the area identified does not comply with policy 6.62g (set out below)
- 1.5 We are also concerned about the interplay between the revision to the definition of tall or large buildings in 6.9 in the context of district town centres, particularly Coulsdon, which does not have a history of tall or large buildings. The existing definition of a tall building being greater than 25m in height should, in our opinion, remain.
- 1.6 In general we would suggest the following amendments to the definition of focussed intensification: -

DM10.11b Developments in areas of focused intensification should contribute to an increase in density and a change in character. They will be expected to enhance and sensitively respond to positive aspects of existing local character by being of high quality and respectful of the existing place in which they would be placed.

6.62f Focused intensification aims to maximise use of the existing growth capacity and to support sustainable spatial vision for the borough through an increase in density of development. Sites will be redeveloped with denser forms of development of an evolved and enhanced character to that which exists in the local area currently. At the heart of each area of focused intensification is an area with a variety of characters. As each area of focused Intensification is currently low density it would not be justified, when there is unmet housing

need, to seek to move towards a more consistent character that replicates surrounding low density development types.

6.62g Focused intensification areas shown in the policies map are identified using the following indicative criteria: 1. Within 800m of a school (secondary or primary); 2. Within 800m of open space (Green Belt, Metropolitan Open Land, Local Green Space or Other Open Space); 3. The area has capacity to change meaning either the local predominant character types are Detached Houses on Large Plots and Scattered Houses on Large Plots; or there are large development sites in the area and 4. It is not within in a Conservation Area or Local Heritage Area.

6.62h Additional indicative criteria used to ensure that the focused intensification areas have good access to services and public transport are as follows: 1. It is within 400m of Croydon Metropolitan Centre or a Town Centre designated as a District Centre in the London Plan; 2. It is within 400m of a Local Centre, Neighbourhood Centre or Shopping Parade and it is an area with a PTAL of 4 or above; or 3. It is within 400m of a Local Centre, Neighbourhood Centre or Shopping Parade and within 400m of a train or tram stop.

6.62i It has been identified that there are a number of heritage assets in several focused intensification areas. Any development proposals proposed in these locations must be informed by and enhance the design and character of heritage assets, and be subservient to them and the height of any new buildings should take into account the topography of the area and respect site lines to local landmarks or heritage assets.

6.62j Each of the areas of focused intensification are, in part, at risk of fluvial, surface water or groundwater flooding. However, a Strategic Flood Risk Assessment has identified that developments in these areas could be made safe from flooding without increasing flood risk elsewhere. **Where such risks have been identified flood alleviation schemes must be carried out prior to the implementation of any planning consent.**

6.62k Developments located on the edge within the boundary of intensification areas should create a respectful transition in scale, height, and density, stepping down to lower density adjacent sites that fall outside of the boundary. Guided intensification associated with enhancement of area's local character (Place specific policy)



6.63 In line with the London Plan Policy 7.4, the local character of the borough's 16 Places has been mapped. There are places of inconsistent character that overlap with focused intensification areas. In such cases a Place Specific Policy will also apply. In locations within the places of Purley, Broad Green and Selhurst, the place specific policies will override the building height requirements of policy

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