

Appendix 5

Summary of the main comments received on Croydon Local Plan: Detailed Policies and Proposals (Preferred and Alternative Options) consultation November 2015 and the Council's response and changes made to Croydon Local Plan: Detailed Policies and Proposals (Proposed Submission).

Policy as in November 2015 consultation document	Summary of comments	Summary of changes made to Croydon Local Plan: Detailed Policies and Proposals (Proposed Submission)
Overarching comments	Comments about the complexity of the documents, their ease of use and the length of the consultation period.	The document has been made easier to read including a guide to which policies apply to which type of development and what is proposed in each Place.
Chapter on Homes	Support assisted living and believe that planning policy should tie in with our over 65's commissioning. Keeping older people independent and safe in their own environment without having to keep our elderly in care homes should be a priority. Don't see this in the strategy.	The plan already supports the provision of sheltered accommodation as supported assisted living through the implicit support for smaller units in Policy DM1 and the explicit support for supported living in Policy DM3.
Policy DM1: Housing choice for sustainable communities	<p>It is not clear that the basis for the proposed 130m² internal area in para 4.13?</p> <p>More family housing is needed. There are too many rental properties and properties turned into flats. The new flats and apartments will need car parking spaces.</p> <p>A greater number of smaller houses are required in Coulsdon.</p> <p>There is a need to control conversions so as not to lose three and four bedroom properties.</p> <p>The requirement for 3 bedroom homes should be reduced in line with the Strategic Housing Market</p>	No changes to policy other than it will be amended to say that the protection of small family homes and 3-bedroom properties will apply to redevelopment as well as conversion. The policy otherwise encourages a mix of units (both large and small) on sites across the borough and does not conflict with either the London Plan or the Croydon Opportunity Area Planning Framework.

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	<p>Assessment and London Plan, particularly in areas of low PTAL.</p> <p>20% three bedroom or larger units are proposed in the majority of the Opportunity Area. This includes Mid Croydon where Delancey are in early pre-application discussions with the Council regarding residential development. A requirement for 20% three bedroom units in this location is considered overly restrictive as the actual amount of three bed homes a site is capable of accommodating will vary significantly depending on its nature, location, target market and site specific economics. This proportion of 3 bed units for market housing is not considered appropriate in the Mid-Croydon area and, given their unsuitability, will act as a drag on viability potentially resulting in a lower provision of affordable housing. The OAPF provides for flexibility and a case by case consideration of mix. The Policy should be amended to allow for flexibility and not be a minimum requirement.</p>	
Policy DM2: Development on garden land	<p>New development, including backland development, should only be permitted if the impact on infrastructure has been assessed as part of the Design and Access Statement. Data on infrastructure should be made available to developers.</p> <p>The policy should set out the</p>	<p>The policy complies with the provisions of the NPPF and the London Plan. The Council has not chosen to introduce a presumption against development on back gardens as it is not considered that restricting this type of development is justified or could be robustly evidenced. The wording of the policy has</p>

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	<p>requirement for when an ecology report is required.</p> <p>The policy should require applicants to provide the curtilage area and the footprint of the host dwelling with any application. The area of the partitioned new curtilage, the footprint of the proposed development and the proposed number of habitable rooms should all be provided for any new dwellings so that the housing and residential densities of Housing and Residential Densities of the proposed development can be calculated to assess the impact on local character.</p> <p>This policy should recognise the wide ranging importance of gardens and should emphasise a presumption against development on garden land.</p> <p>The wording “complement the local character” is too vague and too capable of different interpretations to give the protection of gardens proposed in the rest of the document.</p> <p>More weight needs to be given than in the current wording on the quality of life for people in new and existing homes.</p> <p>The Mayor raises concern that a change in character could result across Croydon due to the borough's proposed back gardens policy. The proposed documents provide limited</p>	<p>been amended to further detail the criteria for this type of development. 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. The policy does not explicitly refer to biodiversity, flooding and other issues such as amenity. The Plan should be read as a whole and policies with respect to these issues will be applied as relevant to such applications.</p>

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	<p>guidance on how this will be implemented. Further guidance should be provided on how this policy is implemented. The policy should take account of the criteria in the Mayor's Housing SPG when deciding whether to release garden land.</p> <p>A resident's group supports limitations on garden developments in order to preserve the green environment and provide sources of food for wildlife, essential for pollination and a balanced environment. They note that were a policy to be adopted to oppose garden developments, it would further reduce the space available for housing and add even further to the densely developed and inhabited centre. The requirement to protect biodiversity should not limit garden development as it will reduce the space available for housing.</p> <p>Insufficient protection is given against the construction of outbuildings including in gardens</p>	
Policy DM3: Residential care and nursing homes	<p>The policy should refer to the London Plan's monitoring benchmarks for the provision of specialist housing for older people.</p> <p>The London Borough of Sutton is concerned that the policy limits the provision of care homes to residents within the London Borough of Croydon. The care home</p>	The policy now includes a reference to support for supported living in Croydon.

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	<p>market for self-funders is not arranged on local authority boundaries and, therefore, it is difficult to see how the council will be able to make this policy effective.</p> <p>The Plan's evidence base does not support the restricting of further residential care and nursing homes in the borough. On the contrary, the evidence makes clear that there is and will be a need for further provision over the period to 2036. The emerging policy fails to explicitly demonstrate how it will be meeting the needs of an ageing population with specific care and housing needs. In addition, the emerging policy is not compliant with national planning policy and guidance, which explicitly outlines that a range of housing types and sizes must be delivered by Croydon Council to meet the growing older population and the needs they have. The Council is asked to amend emerging Policy DM3 to reflect the objectively assessed housing need and national planning policy and guidance, to ensure the Plan meets its need for housing older people. This in turn will also meet its overall housing need, as older people will move into suitable accommodation out of houses that are too large for their need, which in turn will release family accommodation for those in need of larger homes.</p> <p>Croydon has, in some parts of</p>	

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	the Borough, plenty of choice. But not in Shirley. I would like to see a preferred option to establish at least one more nursing home in Shirley.	
Residential annexes	We are not opposed to houses adding residential annexes with separate internal facilities but are strongly of view that they should share the entrance to the existing property nor should they extend to the boundary fence in order not to alter the street scene by turning semi-detached properties into rows of terraced houses. We do not object to the annex remaining as a separate annex or to be incorporated back into a single dwelling as circumstances change.	No changes to the proposed approach of relying on other policies of the Local Plan.
Chapter on Employment	A policy to promote the burgeoning cultural and creative quarter that is developing in the Crystal Palace triangle should be framed, in a similar vein to the proposed Restaurant Quarter policy, DM7	DM4: Development in Croydon Metropolitan Centre, District and Local Centres will permit B1 uses in Secondary Retail Frontages to support the provision of office, research & development and light industrial workshops in town centres.
Policy DM4: Development in Croydon Metropolitan Centre, District and Local Centres	The Mayor welcomes Croydon's ambitions to support its town centres through consolidation and re-energization, including by enabling units outside core frontages to be redeveloped for housing. However, its approach to 'all other uses' in the Main and Secondary Retail Frontage may miss opportunities for wider land uses that could contribute to the viability and vibrancy of the town centre. In this regard, the wording in Table 5.1	DM4: Development in Croydon Metropolitan Centre, District and Local Centres will permit B1 uses in Secondary Retail Frontages to support the provision of office, research & development and light industrial workshops in town centres. No other changes to the policy.

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	<p>should be amended to allow for other land uses that the Council deems would contribute to the viability and vibrancy of the town centre, while not distracting from its retail function</p> <p>Can you please get a better balance of retail outlets in the high street there are far too many fast food outlets.</p> <p>Norbury Option 1 – Support for the removal of the northern stretch of London Road past Norbury Brook and the former office buildings and the fire station in the south from Norbury District Centre.</p> <p>Norbury Option 1 would downgrade the 1433-1493 to secondary retail status from main retail function. The document states: ‘The MRF at this point is interspersed already with non A1 uses and whilst there is an argument for keeping the designation, there is a counter argument that it is a stopping the development of a restaurant quarter in this location.’ The general view of residents who express their view is that there is already more than enough restaurants and cafes in the District Centre. There is also a case for the current secondary retail frontages further south to the fire station to be given main retail frontage designation particularly with the large increase in population in the former office buildings of Astral and Windsor Houses on</p>	

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	<p>the other side of London Rd</p> <p>Policy DM4 should be amended to make clear that schemes which are not mixed use but instead propose a single, town centre use, will be acceptable and there will be no impediments or policy requirements to satisfy. The policy as drafted is very restrictive and will not encourage the amount of new commercial development required (and identified) to come forward. The policy therefore will not achieve, and is inconsistent with, policies SP3.3 (a), SP3.11, SP3.13 (a) or paragraph 7.32 of the Croydon Local Planning Strategic Policies.</p> <p>Policy DM4.2 should be amended to make clear that the proposals and changes of use which accord with table 5.1 relate to use of the ground floor only.</p> <p>Policy DM4.3b is unreasonable and takes no account of how the property industry is structured or how land is owned. In some circumstances it may be appropriate for landlords to offer to fit out their tenant's premises, but in other cases, shell and core developments are what tenants require. It is unreasonably onerous to require all tenants to be provided with a fully fitted out unit whatever the circumstances, and will only delay and constrict the</p>	

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	pipeline of new commercial floor space, to the detriment of the local economy.	
Policy DM5: Development in Neighbourhood Centres	The policy should be more detailed.	No changes to this policy.
Policy DM6: Development in Shopping Parades	<p>Morland Road should remain a shopping parade as this area has had an increase in number of viable outlets (pharmacy and new restaurant).</p> <p>The Old Lodge Lane shops must also be maintained. They are vital for the elderly and vulnerable residents who live in this remote part of Kenley.</p>	No change to this policy. The removal of designation from certain areas does not mean that the remaining shops will close if there are still customers to make them viable. Neither does the existence of a designation mean that the shops won't close if there are insufficient customers to maintain them as a business.
Policy DM7: Development in Restaurant Quarter Parades	The Restaurant Quarter should retain a diversity of retail activity. Planning that favours restaurants/bars over other shops and offices is counter-productive economically and socially in this part of South Croydon.	No changes to this policy. These parades have been designated to support the Restaurant Quarter and so only certain uses are permitted to support and maintain these uses. Other retail and town centre uses are permitted in the remainder of the Metropolitan Centre.
Policy DM8: Development in edge of centre and out of centre locations	<p>It is noted that the preferred option for Policy DM8 seeks to restrict any extension to the floor area of existing out-of-centre retail sites to 10% of the original building. This is considered unduly restrictive.</p> <p>It is requested that Policy DM8 be amended to accommodate the specific needs of certain specialist retailers such as garden centres, by excluding them from the general category of Class A1 – A4 uses and, as a minimum, by including them in the class with offices and other main</p>	<p>No changes proposed to this policy.</p> <p>Table 5.9 offers flexibility to existing occupiers by allowing them to increase by up to 10% without the requirement for a sequential test. Once this threshold has been met no further expansion will be permitted to support the Metropolitan Centre, District and Local Centres. It is not considered that garden centres have special circumstances that require them to be excluded from the A1 to A4 uses.</p>

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	town centre uses which would impose an increased threshold limit on new development of 20% of the original	
Policy DM9: Expansion of industrial and warehousing premises in Strategic, Separated and Integrated Industrial Locations	If indeed there is a requirement to increase the number of premises for industrial / warehouse usage then turning existing low density industrial / warehouse usage into higher density usage makes sense.	No changes proposed to this policy.
Policy DM10: Design and character	<p>The London Plan Indicates an increase in the communal amenity space from those identified in the Mayor of London's Housing Supplementary Planning Guidance but does not state any value or any increased allocation per resident in hectares. However CLP2 has relaxed the requirement for "Communal Open Space" by omitting UDP saved policy RO12. Bring forward current UDP Policy RO12 into CLP2. If not specified, developers will not offer any communal open space for residents of blocks of flats.</p> <p>The minimum distances (window to window) should be defined so that the policy is enforceable. What does 18-21m actually mean? Why specify a tolerance? The minimum distance should be specified.</p> <p>The standards for private amenity space should be reviewed and increased. 1 Bedroom House or Flat Minimum Private Amenity Space of 5m². If this is the</p>	Policy DM10 has been amended to clarify the requirement for both communal and play space to be incorporated and that it refers to spaces that define that character of an area as well as the buildings.

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	<p>allocation for a house, the amenity space would be less than the width of the house and only about half a metre wide which is a about the dimensions of a pathway.</p> <p>The general lack of communal land for resident's flats is unsatisfactory as should be included, as much existing communal land is already overworked.</p> <p>Under Policy DM 10 Design and Character, we would advise that the policy needs to reflect the need for developments to enhance and sensitivity respond to both the built form and spaces' that define places. This also includes, in line with the NPPF ('Requiring good design'), ensuring developments respond to and integrate with the historic environment (NPPF para's 58 and 61). At present this is not explicitly expressed.</p> <p>Policy DM10.1 is too restrictive as it anchors all new development to the context established by the predominant built form. This will make it difficult to achieve bigger, taller and larger new buildings which are able to house and employ more people and contribute to the economic growth and strength of Croydon. The policy needs to be amended to make it clear the circumstances in which such new development is encouraged, and able to</p>	

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	<p>come forward.</p> <p>Amenity and play spaces are essential in large new developments, but should not be at the expense of and discourage the use local parks.</p> <p>DM10.4 (f) refers to child play space and would appear to seek provision on site for all children. This is inconsistent with the Mayors approach and will clearly not be deliverable for high density town centre schemes. The policy should be amended to refer directly to the Mayors guidance, which should be applied.</p> <p>The requirement for all affordable housing of over 10 units to provide 10sqm per child of new play space is considered to be onerous. Not all buildings being converted to flats where there is an affordable housing requirement have enough amenity space to provide play space to this standard or even at all. The play space requirements should be reduced, particularly where it involves conversions of existing buildings. The policy should also make clear what type of affordable housing it relates to and whether it applies to the private sector.</p> <p>DM10.5 is concerned specifically with ensuring the amenity of the occupiers of adjoining buildings. We consider that when the</p>	

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	<p>application site is in the town centre draft Policy DM10.5 is overly prescriptive and does not allow for sufficient flexibility for development proposals to come forward which are considered acceptable against the relevant assessment criteria. An element of direct overlooking is, in our opinion, an inevitable consequence of development in Croydon town centre. The wording of DM10.5 should be amended to include the required flexibility.</p> <p>The policy should be made less subjective and contain more detail within the policies rather than the supporting text, along with diagrams.</p> <p>The wording on 10.8(d) is onerous. The 'natural habitats' definition is too broad as it encompasses all areas. When developing a site, Persimonn make efforts to retain as many existing trees and vegetation on a site; however this is not always viable or safe when progressing a site. Persimonn believe that the wording should be changed so that the definition is not as restrictive.</p>	
Policy DM11: Shop front design and security	Residential conversions should not be allowed in parades with high commercial or community usage. Policy should encourage the use of brick.	No change as this is covered by the employment policies of the Local Plan already.
Policy DM13: Refuse and recycling	This is a contentious matter in residential areas where houses are converted into flats and the front of the property	Policies DM13.3 -DM13.5 have been removed. No other changes as the supporting text within the reason justification

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	<p>ends up being littered with big numbers of landfill bins, recycling bins. There should be a policy on use of commercial bins for conversions, very tight requirements for sensible siting and design of the refuse storage housing. Same for newly built properties of more than say 3 flats.</p> <p>Policies DM13.2 to 5 should be deleted as they provide excessive levels of detail in relation to the objective set by policy DM13.1d which is to provide safe conveniently located and easily accessible waste refuse facilities and layouts.</p>	<p>provides guidance about accommodating refuse and recycling resulting from conversions of houses to flats.</p>
Policy DM14: Public art	<p>The Council should commit to providing public art in Coulsdon town centre.</p> <p>The Arts Network welcomes the inclusion of the policy on public art, but considers it is limited in its vision.</p> <p>It is onerous for all major schemes to be required to provide public art. It may not be appropriate in many situations as neither the building nor its street context may be suitable for the provision of public art. The policy should be redrafted to make clear that where developments qualify, and are suitable to provide public art, then they should do so using the criteria set out in (a) to (e) of Policy DM14.</p>	No changes to the policy.
Policy DM15: Tall and large buildings	The Metropolitan Centre has been identified as being	No changes to the policy.

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	<p>suitable for tall buildings. The Local Plan needs to state specifically that very tall buildings should not be allowed on the edge of the Metropolitan Centre where there are significantly lower residential buildings.</p> <p>Tall buildings should not be approved in District Centres.</p> <p>The policy should be amended so that tall buildings are only permitted in the Metropolitan Centre.</p> <p>Criterion d proposes that buildings taller than 40 storeys will need to incorporate amenity space such as sky gardens, atriums and roof terraces that are accessible to the public as well as residents of the development. We consider that the wording of Policy DM15 (d) should be amended to add flexibility to the approach towards amenity space to buildings over 40 storeys. We would suggest that individual sites should be considered on a case by case basis so that they can be assessed on their own merits and their ability to provide the proposed amenity space.</p> <p>Policy 15.1.c requires tall buildings to be of exceptional quality which is extremely onerous and it is not clear why this class of buildings have to be of exceptional quality.</p> <p>Policy DM15.1 should be reworded to the following "and</p>	

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	<p>do not harm the setting of designated heritage assets"</p> <p>It is not clear why tall buildings should have their ground and first floors available for publicly accessible uses and spaces while smaller buildings do not.</p> <p>The policy should seek active ground floor uses where appropriate.</p>	
Policy DM16: Views and Landmarks	<p>The policy should be reworded to the following "Developments should conserve or enhance the Croydon panorama". It is considered that conserve in this context means 'not harm'. Unlike the London View Management Framework, the views mentioned within this policy do not have geometrically defined corridors to strategic corridors and therefore the extract "and should seek to avoid buildings that tightly define the edges of the viewing corridors" is not relevant.</p>	Policy made clearer but no change in effect.
Policy DM17: Heritage assets and conservation	<p>As stated in Historic England's guidance on setting, not all aspects of the setting of a heritage asset will necessarily contribute to the significance of a heritage asset. The value of the setting of a heritage asset lies in what it contributes, if anything, to the significance of the heritage asset; it is not itself a heritage asset of intrinsic historic or architectural interest. As set out in paragraphs 132-135 of the NPPF, harm to the significance of a designated heritage asset may be</p>	<p>Amend Policy DM17.5. The policy is complementary to NPPF and the London Plan and should be read in conjunction with the above. In order to flag up the option of demolition the bullet point a will be expanded to read: 'Substantial weight will be given to protecting and enhancing Locally Listed Buildings; where demolition is proposed, it should be demonstrated that all reasonable attempts have been made to retain all or part of the building'</p>

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	<p>balanced by the public benefit provided by the development proposal. The policy should be reworded to take account of the NPPF and Historic England guidance.</p> <p>DM17.5 – Either the Local List of Buildings of Architectural Importance SPD should be incorporated within the LDF, or this reference should be deleted because it is not clear how long this will remain in force or what its future equivalent might be.</p> <p>As drafted it does not correctly reflect the advice set out in the NPPF. DM17.5a gives substantial weight to protecting and enhancing locally listed buildings yet the NPPF makes clear that the demolition of a locally listed building requires a balanced judgement to be made having regard to the scale of any harm or loss and the significance of the heritage asset in relation to the proposals for redevelopment.</p> <p>DM17.5 – It is not clear why all alterations and extensions must enhance a building's character. It is possible that within a scheme there may be elements that detract as well as enhance the building and yet overall, the conservation balance is such that the scheme has a positive impact, and is therefore acceptable. As drafted the policy does not have any flexibility and does not reflect this concept of the</p>	

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	conservation balance and the overall impact of a scheme upon a building or an area.	
Chapter on Community Facilities	Crystal Palace FC request a specific policy about Selhurst Park and its importance to the borough (to protect the stadium and facilitate its growth/regeneration)	A specific policy about Crystal Palace Football Club has been added to the Local Plan.
Policy DM18: Providing and protecting community facilities	<p>The policy and the supporting text should reference playing fields and indoor and outdoor sport facilities. It should reflect Sport England's Land Use Planning Policy Statement, Paragraph 74 of the NPPF and Sport England's Playing Fields Policy.</p> <p>Policy DM18 could be amended to include cultural facilities as well as community facilities.</p> <p>The distribution of community facilities across the borough are not spread equally in relation to the areas of population. Some areas have significantly more community facilities than other areas. The policy should set out how it will increase community facilities in those areas which do not have adequate community facilities.</p> <p>There is a need for additional NHS facilities within the Croydon Opportunity Area arising from the enhanced levels of development that are anticipated to be directed to this area over the coming plan period. This need has not been identified and is not subject to an evidence base,</p>	<p>The distinction between commercial and non-commercial facilities has now been removed.</p> <p>No other changes to the Policy as it covers the types of facility listed in the comments both the protection of and the consideration of proposals for new facilities.</p>

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	<p>and the NHS should be made to provide one if a policy is being used to secure facilities. In addition, given that new development within the Croydon Opportunity Area will be expected to help make provision for the NHS, then the criteria by which this will be sought should be set out in this policy.</p> <p>We believe the distinction between commercial and non-commercial facilities is neither needful nor meaningful and should be dispensed with.</p> <p>Why is there no policy to protect school playing fields and grounds from non-educational development?</p> <p>Why is there no policy for safeguarding library buildings and site proposals for their retention as libraries and as community facilities?</p> <p>We believe that this policy is overly prescriptive and redundant and that rules covering other developments already cover community facilities. Overall, Policy DM 18 is opaque/inaccessible to the general public. Moreover, it provides significant loopholes for developers to build whatever they wish rather than what the community needs.</p>	
Policy DM19: Protecting Public Houses	Public Houses should be protected where they provide a recognised community benefit. There are a number of public houses within the	No changes to the policy.

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	<p>borough that do not contribute in a positive manner to the community and a blanket protection of such uses would be counterproductive to good planning. Similarly there are public houses that do provide a community benefit, and those should be listed as community assets in order to protect them from demolition and change of use proposals.</p> <p>We would seek to include an additional requirement to the policy which ensures that the heritage interest of the public house has been assessed prior to any decisions for its change of use or demolition.</p> <p>Propose the addition to Detailed Policy DM19 Option 1 of: 'and no community support for it remaining a public house' to be inserted at the end of the first sentence.</p> <p>The policy states that planning permission will not be granted for demolition or change of use of a pub unless the council is satisfied that there is not a defined need for a pub. One of the justifications for change of use from a public house is that the owner has marketed the pub for 18 months without success. This takes no account of a building that was built as a pub but has not been used as a pub for a long time. It is not clear whether the policy is meant to apply to a building where the last lawful use was a pub-if so it could be a long time since it</p>	

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	<p>was last used. The tests set out in the policy should be revised as they confuse the issue of whether the pub is used and whether it is of historic merit. Just because the building is listed or locally listed doesn't mean it is viable or needed as a pub. The CAMRA test is also not required alongside the viability test.</p>	
<p>Policy DM21: Sustainable Design and Construction</p>	<p>The policy should reference the Mayor's Air Quality Neutral policy and his The Control of Dust and Emissions during Construction and Demolition SPG.</p>	<p>The reasoned justification makes reference to this SPG.</p>
<p>Policy DM23: Sustainable Drainage Systems and Reducing Flood Risk</p>	<p>Recognition of the surface water implications and flood potential of Chaffinch Brook, The Beck, and Ravensbourne Brook should be included.</p> <p>The effect of cumulative development, including of small developments such as outbuildings used for accommodation, leading to flood risk, has not been recognised.</p> <p>The policy could incorporate a more proactive approach to ensure that developments within catchments with a flood risk contribute to reducing this risk through SuDS.</p> <p>The policy should not require all developments to incorporate SuDS to the presence of Clay in the borough. Developments should be required to undertake soil tests to establish the water table level.</p>	<p>No changes to the policy.</p>

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Chapter on Green Grid	School Playing Fields and green spaces. There is a need for these to be protected in the Plan and added as a list.	School playing fields and green spaces which are protected as Metropolitan Green Belt, Metropolitan Open Land and Local Green Spaces will be shown on the Policies Map.
Policy DM24: Metropolitan Green Belt, Metropolitan Open Land and Local Green Spaces	<p>Add to list of Local Green Spaces the following:</p> <ul style="list-style-type: none"> The Briar Road Green (Norbury) Norbury Manor Primary School playing field St Helen's Green (Norbury) The Pollards Hill Triangle (Norbury) The Pollards Hill former allotment site (Norbury) St Philips' Church grounds (Norbury) Green space in front of Semley Rd Church (Norbury) The gardens around St James Church (now residential) at the junction of Sydenham Road and St James's Road (Broad Green & Selhurst) Stoats Nest Green (Coulsdon) Green space opposite Hamsey Green pond (Sanderstead) The green at the junction of Temple Avenue and Southway (Shirley) The existing wooded site delineated by Bushey Road, Ash Road, Bridle Road and Oak Avenue (Shirley) <p>The Council should explicitly state the reasons behind any changes in designation to Green Belt or Metropolitan Open Land (regarding Sanderstead Plantation) and make clear why a designation has hanged from one to the</p>	<p>Pollards Hill Triangle and St James's Road gardens have been designated as Local Green Space. The other sites were assessed and did not meet the criteria for designation.</p> <p>No other changes to the Policy or sites.</p>

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	<p>other, as this is not clearly understood by residents who have contacted us.</p> <p>TfL requests further discussions with the Council about the Green Belt boundaries in the Elmers End area. Although this is not included in the amended designation section, TfL would like to look at the options of changing the boundaries for this area to ensure it does not restrict the aspirations to provide a second platform or double tracking.</p> <p>The council should also state clearly where and how Green Belt areas will be protected and enhanced in line with National and Regional policy.</p> <p>The 20% of the original floorspace or 100sqm should be removed as it will impact on extensions to small buildings. The policy should address the considerations of paragraph 89 in the NPPF rather than using fixed numbers to assess the impact on the Green Belt. The reasons for not stating such a figure were well explained in the text (paragraph 6.17) supporting policy R03 of the Croydon Replacement Unitary Development Plan. Rather than setting an arbitrary number the main question to be asked of the development should be what is the impact on the green belt?</p>	
Policy DM25: Biodiversity	With regard to DM25d we would recommend the text is	Paragraph 9.36 now sets out when an ecological

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	<p>amended to recognise the hierarchy of biodiversity designations which ranges from those of national (and international) to local level. This is in accordance with Paragraph 113 of the NPPF which states: Distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution they make to wider ecological networks.</p>	<p>assessment is required.</p>
Policy DM26: Trees	<p>Tree removal goes ahead by spurious claims of danger, undermining of buildings and assertion of lack of merit in suburban trees that fail to meet what would be national collection standards. Again, tree removal becomes incremental with a sequence of applications as development work proceeds, masking the overall effect of development.</p>	<p>No changes to the policy.</p>
Chapter on Transport and Communication	<p>Extra traffic flows created by development, in my view, makes it important for the council to be acute in its consideration of air quality in Waddon. Waddon hosts the key vehicular route from the south into our growing town centre. Air pollution measurements on the Purley Way show that at rush hour peaks that air pollution comes very close to breaching acceptable limits. In these circumstances I would ask that consideration be given to the</p>	<p>No changes to the Plan.</p>

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	<p>practicalities of including within the revised Plan flexibility for the promotion of Park & Ride facilities in the Borough. The protection of a route for trams to Purley that would mitigate car borne pollution in the Waddon community, maximise ease of access to central Croydon for shoppers and promote the Plan's aspiration for increased public transport use would also be important in protecting air quality locally.</p>	
<p>Policy DM27: Promoting sustainable travel and reducing congestion</p>	<p>DM27 needs to take into account that there will always be people who want to use cars</p> <p>As drafted, the policy will not always be practically achievable if Croydon's growth potential is to be realised.</p>	<p>No changes to the policy.</p>
<p>Policy DM28: Car and cycle parking in new development</p>	<p>There should be a presumption against developments with a reduced amount of car parking</p> <p>The policy should be amended to increase the amount of parking in areas of low public transport accessibility</p> <p>Policy should ensure new garages are built to accommodate modern cars.</p> <p>A requirement for motorcycle parking should be introduced alongside car and cycle parks in residential developments and this should consider security and storage facilities.</p> <p>Reconsider the strategy of the quantum of parking for</p>	<p>The policy will be amended to require increased provision of car club/pool car spaces where reduced levels of car parking are proposed compared to the maximum level set out in the London Plan. This will ensure that residents of developments with reduced amounts of parking can live in them without needing their own car and adding to pressure of on-street parking. The requirement for cycle parking will also be amended to encompass motorcycles and mobility scooters. The policy has also been amended to require developments that result in the loss of car parking to demonstrate that there is no need for those spaces.</p>

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	<p>developments relating to the existing transport facilities (Public Transport Accessibility Levels), for outer London towns like Purley and reject the idea of central London of zero parking facilities and include a reasonable policy to deal with commuter parking.</p> <p>The policy should make reference to the OAPF and its parking scenarios.</p>	
Policy DM29: Temporary car parks	It is wrong not to allow temporary car parks on demolition sites and open spaces where there is a clear need to create temporary car parking to either relieve existing sites or replace existing car parks that are being refurbished or under reconstruction. We are of the view a temporary car park should be created on Cane Hill until the Lion Green Road site has been completed.	The only instance that a temporary car park may be justified is when it is a time limited replacement of a permanent car park that is being redeveloped. The supporting text of Policy DM29 will be amended to reflect this and provide justification for a departure from the formal policy.
Policy DM30: Telecommunications	Sites of Importance for Nature Conservation should be included under DM30.1b.	No changes to the policy as covered by other policies of the Plan.
Policy DM31: Positive character of the Places of Croydon	DM31.1 - We support the demolition of old life expired large properties and their replacement with a greater number of smaller houses, apartments and flats on the same site provided that this does not lead to overcrowding. We believe this is more desirable than turning large unsuitable properties into multiple occupation. We are opposed to the replacement of existing good quality property that is not life expired and still suitable for occupation as this can radically alter the existing	No changes to the policy but significant amendments to the boundaries to the areas of focused intensification removing many areas that consist solely of housing on smaller plots (Policy DM31.4).

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	<p>street scene.</p> <p>Policy DM31.2: Positive Character of the Places of Croydon, should be amended so that it only applies to areas where there is already a predominance of three storey buildings or at least a mixed character.</p> <p>DM31.4 – The boundaries should be re-drawn to remove the predominantly two storey residential roads that should not be subject to change.</p> <p>DM31.4 – The plans for intensification of residential development are unacceptable and will overburden the already problematic local road infrastructure.</p> <p>DM31.4 (Shirley) – The bulk of the proposed intensification area has a PTAL score of only 2, some parts as low as 1a. The council already knows there are existing traffic problems in Shirley even before any houses are built - see page 253 of transport strategy document which notes high car dependency due to poor public transport and peak time congestion.</p> <p>DM31.4 (Forestdale) – lots of misunderstanding that assumed the policy applied to the Forestdale Estate (it doesn't) rather than the proposed neighbourhood centre.</p>	
Policy DM32:	DM32.1 – While I do want to	Site 120 (Timebridge Centre)

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Addington	<p>see the regeneration of the western side of Central Parade, I don't believe 12-storey tower blocks are appropriate nor do I think this is what the people of New Addington want.</p> <p>With Regards to Policy DM32.1b , I am against the building of more housing here as we need to function as a community, and this little area with pool/hall is what the keep this New Addington community together. There is more green belt around Kenley, Purley or Coulsdon where it is not overcrowded already. New Addington is not the area for more housing; We would benefit more from more decent smaller shops and less of the monopoly on the parade. Provide us with a new leisure centre, Centre for Families and the Elderly. Same goes for the traveller site- we do not need more bad vibes here, please let us get ourselves on our feet first. We all area standing together trying our best to give New Addington a better name as we have loads of good people around here too.</p> <p>We would like to take this opportunity to draw the attention of the Council to a site controlled by Persimmon Homes located in Addington. This site currently lies within the Green Belt, however to what extent this land meets the purposes of the Green Belt, outlines in paragraph 80</p>	<p>has had its proposed use amended to make clear that any formal playing field will need to be relocated (on an adjacent site). Development will also only be permitted as part of a rationalisation of the community facilities on the Fieldway estate with no existing use being forced to close as a result of the development of this site.</p> <p>Site 755 (Pear Tree Farm) has been removed from the Plan as the landowner is not willing to sell the site for Gypsy and Traveller use. The provision of Gypsy and Traveller pitches will be made by expanding the existing site at Lathams Way and by allocating the Purley Oaks depot as a Gypsy and Traveller site.</p> <p>No other changes to this policy or sites.</p>

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	<p>of the NPPF is contentious. We believe that this site could accommodate residential development.</p> <p>Timebridge site – London Wildlife Trust concerned about loss of open space.</p> <p>Central Parade – objections to the amount of housing proposed on the site</p> <p>Secondary school (Rowdown Fields) – what is need and can public transport and road network cope?</p> <p>Pear Tree Farm – Landowner does not wish to sell site. London Wildlife Trust objects on grounds of impact of Sites of Nature Conservation Importance of Metropolitan value. Site is used by the Croydon Auto Bike scheme that trains people who have been riding motorbikes illegally to use them legally and safely. New Addington has a huge problem with motorbike being ridden on green spaces and on the roads by underage youths, surely this is reason enough not to consider using this space. Concern that the existing waste facility would need to be moved (but where to). The assessment of potential sites for Gypsy and Traveller pitches proceeded from an erroneous starting point of "absolute" requirements that were neither justified nor supported by the Council's existing gypsy and</p>	

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	traveller policy. The Evidence Paper is lacking in detail, and the scoring criteria overly simplistic.	
Policy DM33: Addiscombe	<p>DM33.1 – Clause e from previous policy (“Incorporate or retain traditional shop front elements such as stall riser’s fascias and pilasters”) should be reinstated.</p> <p>The policy should address the area around East Croydon station/off Cherry Orchard Road.</p> <p>DM33.2 – The policy needs to be more detailed in order to revitalise the retail areas and resolve the transport and traffic issues.</p> <p>I would propose to consider extending tramlink to Shirley as the area in between is poorly covered, before it is built up even more. Perhaps a new tram line ending via Ashburton fields, or from Elmers end to Addington.</p> <p>The World of Golf site should be included in Table 11.6 for residential development (including a significant area of publicly assessable open space and a new community facility).</p> <p>Rees House and Morland Lodge – this should be a housing site as it is not large enough for a secondary school.</p> <p>Rear of The Cricketers, 47 Shirley Road - The allocation</p>	<p>Clause e has been restored to the policy.</p> <p>No other changes to the policy or sites (other than to remove sites under construction).</p>

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	<p>is speculative and would maybe undermine the present pub. Concern about impacts on access to the adjacent MOL site.</p> <p>130 Oval Road – 10-57 homes on this site is ludicrous – it could only be achieved by building flats which would be out of character with this area and many properties would be overlooked.</p>	
Policy DM34: Broad Green and Selhurst	<p>DM34.3 should not allow for 6 storey development around the Lombard Roundabout as intensification of this area is already having an impact on local amenities and infrastructure</p> <p>The Whitehorse Community Centre and The Aztec Centre in Boulogne Road and adjoining grass space provide a suitable footprint for a new secondary school, when seen in conjunction with the existing Crescent site that has the potential to be reorganised. Crescent Primary School are seeking to engage Croydon Council, who own these premises. We are therefore requesting that Croydon Council make these premises available for free school development.</p> <p>Land at AFC Croydon - this site continues to meet the criteria for Metropolitan Open Land designation and so it is wholly inappropriate to allocate the site for a school. Additionally, the site is relatively inaccessible which</p>	No changes to the policy or sites (other than to remove sites under construction).

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	<p>would almost certainly lead to increased traffic even with improved public transport.</p> <p>If 103 Canterbury Road is to be considered as suitable for a primary school, then the area will require significant transport and road safety improvements.</p> <p>Valley Park (B&Q) - The Council should consider the suitability of residential development given that the site is in Flood Zone 2. The site should also not be allocated for redevelopment which may affect the operation of B&Q.</p> <p>Valley Park – site should include the Stewarts Plastics site.</p>	
Policy DM35: Coulsdon	<p>Developments in Coulsdon should provide retirement homes.</p> <p>We support the use of the remaining space on Leaden Hill for town centre housing, but this must have adequate parking to reflect the number of dwellings as it is in a town centre location in a controlled parking zone.</p> <p>A site for a small town centre garden should be identified.</p> <p>If the Calat Centre is closed the southern car park should be separated from the site and continue to be used as a public car park. The site could be used for other community uses, retail, commercial or</p>	<p>Site 372 (Lion Green Road) has had its proposed use amended to reference car parking.</p> <p>No other changes to the policy or sites.</p>

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	<p>housing.</p> <p>We are of the view a temporary car park should be created on Cane Hill until the Lion Green Road site has been completed.</p> <p>Cane Hill – Barrett Homes object to the inclusion of community facilities in this proposed allocation.</p> <p>Secondary School in Portnalls Road – Comments about traffic impacts of a new school. The allocation should include community facilities so that the school facilities can provide a community use.</p> <p>Existing Waitrose store - This site should be used for retail, education, medical centre and a public car park. A number of comments requesting a public car park to be provided on this site at rear of existing building with ground floor retail remaining in the building. Also suggested as a multi-storey car park.</p>	
Policy DM36: Croydon Opportunity Area	Disagree in particular that the area lying to the west side of East Croydon Station Cherry Orchard Road, Addiscombe Grove, Addiscombe Road and Colson Road can be "successfully managed by General policies" (11.79) unlike London Road and Sydenham Road and Lansdowne Road areas. This area is also unique given the proximity to low rise traditional housing.	<p>Site 138 (Land to east of East Croydon station) has had its boundary corrected.</p> <p>Site 142 (1 Lansdowne Road) has been amended and now includes Voyager House.</p> <p>Site 162 (St Georges House) has been amended to reference other town centre uses.</p> <p>Site 172 (Ruskin Square) has been merged with Site 243</p>

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	<p>The tall buildings policy should be addressed and there should be no tall buildings over 25 floors on Cherry Orchard Road/Addiscombe Road due to proximity to low rise residential buildings.</p> <p>Norfolk House and has been suggested by the landowner as being suitable for mixed use high density redevelopment which could include retail, office, hotel and residential uses.</p> <p>A comprehensive redevelopment of the vacant lots and untidy buildings in Park Street should be considered</p> <p>Grants Entertainment Centre, 14 High St. should be retained as a community facility with alternative uses: soft play, free gym, internet café, performance spaces.’</p> <p>MENTA site – boundary is incorrect. Comment from the developer that the uses could be more flexible worded as consented scheme has not been implemented. Other comments that any new scheme should be limited to 25 storeys.</p> <p>1 Lansdowne Road – The allocation should include Voyager House.</p> <p>St George’s House – the allocation should include other town centre uses in addition to current permission (from the</p>	<p>(Lansdowne Road surface car park) and the proposed use for the whole site will be as for Site 172 with no reference to a primary school (or a theatre).</p> <p>Site 21 (Former Royal Mail sorting office) has had its proposed use amended to include a cycle hub.</p> <p>Site 231 (Seagas House) has had its proposed use amended so that community uses would be a preferred acceptable use and other town centre uses would also be acceptable.</p> <p>Apollo and Lunar Houses (Sites 218 and 236) have both had their proposed use amended to state that development will only take place if the sites are no longer required by the Home Office.</p> <p>Site 393 (Whitgift Centre) has had the reference to improved transport infrastructure removed as this was referring to improvements outside of the site.</p> <p>Site A200 - (Dingwall Road multi-storey car park) will now be allocated for residential development and public car parking.</p> <p>No other changes to policies and sites (other than removing sites under construction).</p>

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	<p>developer)</p> <p>Stephenson House – local residents object to it being allocated for a primary school on grounds of access to the site and safety and loss of office space.</p> <p>St George's Walk, Katharine House and Park House, Park Street – the allocation should be more flexible, remove number of homes and include Seagas House (from the developer)</p> <p>Former Royal Mail Sorting Office - The allocation should include a parcel collection Office. Allocation should also include hotel and/or office.</p> <p>Seagas House – should be an arts and heritage centre and not a residential conversion. The best use for the building within the public, commercial, community realm would be as craft workshops, creative studios both in the artistic and digital industries, an industrial and craft centre shop, a gallery, museum and local information centre for visitors to Croydon and possibly and desirably with a performance space for 150 to 200 audience inside in an atrium or Shakespeare's Globe type theatre with banked seating</p> <p>Poplar Walk car park and, 16-44 Station Road – allocation should reflect planning permission/application</p>	

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	<p>Lunar House and Apollo House were built to operate as offices (Use Class B1a) and the Home Office wishes to ensure that the buildings can remain in office use for so long as required.</p> <p>9-11 Wellesley Road – there is a potential for a tall building (up to 40 storeys) on this site which could deliver up to 400 homes and this should be reflected in the allocation.</p> <p>Surface car park, Lansdowne Road – Site is part of wider Ruskin Square development and landowner will not sell it to be used as a primary school.</p> <p>5 and 7 Cairo New Road – It is inappropriate for the Council to suggest that the site of 5 Cairo New Road can be split into two sites and developed as two separate entities. They should be seen as one site and the D1 one use should not be restricted to the northern part of the site.</p> <p>Whitgift Centre - the reference to improved transport infrastructure should be removed as it relates to the borough as a whole and not this specific site. It is likely that many existing businesses will struggle to survive when they have to close or re-locate for the Whitgift Centre to be demolished. Those seeking to move into the new Centre will face higher rental costs of the new shop floor space and business rates compared with</p>	

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	<p>current levels. Existing businesses have no guarantee they will be able to move into the new Centre.</p> <p>Corinthian House - the preferred use should be amended to make clear it is a site suitable for redevelopment, and should state: "Residential and/or any town centre use including hotel and offices. Retail use will be acceptable if the sequential and impact tests can be met.</p>	
Policy DM37: Crystal Palace and Upper Norwood	<p>A policy to promote the burgeoning cultural and creative quarter that is developing in the triangle should be framed, in a similar vein to the proposed Restaurant Quarter policy, DM7.</p> <p>St John the Evangelist Vicarage, Sylvan Road – Any redevelopment must take care not to damage the setting of the vicarage but rather to enhance it.</p>	No changes to policy or sites.
Policy DM38: Kenley and Old Coulsdon	<p>A further policy should be added to enhance and mark the entrance into the borough along the main A23 and A22 corridors.</p> <p>Gayfere House should be allocated for development (it is in Green Belt on edge of Old Coulsdon).</p>	No changes to policy or sites.
Policy DM39: Norbury	A further policy should be added to enhance and mark the entrance into the borough along London Road in Norbury.	<p>The site at 1485-1489 London Road is considered to be appropriate to be allocated for retail and residential.</p> <p>No other changes to policy or</p>

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	<p>DM39.1 should only allow for 5 storey buildings on corner buildings and junctions</p> <p>Replace Detailed Policy DM39.1 by 'Within Norbury District Centre, to facilitate growth and to enhance the distinctive character, developments should:</p> <ul style="list-style-type: none"> a. Complement Maintain the existing predominant building heights of the shopping and housing parades 2 storeys up to a maximum of 5 storeys; b. Ensure proposal for large buildings are visually consistent with the predominant urban grain; and b. Retain the design features of the upper stories and roofs of shopping parades c. Seek opportunity to provide direct access from the south of London Road to Norbury railway station. d. Propose heights the same as the neighbouring shopping parades where single and 2 storey parades are proposed for redevelopment. e. Seek opportunity to provide direct access from the south of London Road to Norbury railway station." <p>Allocate 1485-1489 London Road and Fairview Road for development of retail and residential uses.</p> <p>S G Smith, 409-411 Beulah Hill – Allocate the site for the extension of the existing St John's College</p> 	<p>sites.</p>

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	<p>Multiple objections to the alternative uses of sites in Norbury (where preferred use is no change).</p>	
<p>Policy DM40: Purley</p>	<p>DM40.1 – I agree that proposals should complement existing predominant building heights of 3 to 8 storeys. There is no need for a potential new landmark building but if there is to be one it should be no more than 8 storeys. Anything higher would detract from the character of the district and be overbearing. Lack of parking for a tall building also an issue raised.</p> <p>DM40.1 - Purley Baptist Church would like the policy amended to say a landmark building of up to 17 storeys.</p> <p>GLA - It is unclear why a new landmark building is suggested for Purley District Centre as this is the only location where a building of this prominence and potential height is specified. Where the potential for relatively tall building is proposed, additional text or cross-referencing to wider design policies such as proposed policies of SP4.6 of CLP1.1 and DM15 of CLP2 should be included to ensure that such buildings are of an exceptionally high quality design and complement the existing streetscape, contribute to the public realm and wider character of the area and wider views.</p>	<p>Site 30 (Purley Swimming Pool) has had the proposed use amended so that it is now Mixed use redevelopment incorporating public car park, new leisure facilities including a swimming pool and other community facilities, healthcare facility, creative and cultural industries enterprise centre, retail or residential accommodation.</p> <p>Site 61 (Car park, 54-58 Whytecliffe Road South) has had the proposed use amended so that it includes residential use and car parking.</p> <p>Site A324 (Purley Oaks Depot) will now be allocated for a Gypsy and Traveller site.</p> <p>No other changes to policy or sites.</p>

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	<p>112 Brighton Road should be allocated as a primary school instead of site 490. The site has a total area of 0.30ha.</p> <p>Purley Swimming Pool – The site should include a requirement for a swimming pool and the current level of parking 30 should remain.</p> <p>Tesco site – Potential for housing but 990 homes is too many.</p> <p>Purley Baptist Church – Same comments as for DM40.1</p> <p>95-111 Brighton Road – The site should be extended to include the properties at the end of Old Lodge Lane and should provide a 25m pool/gym in addition to the primary school.</p> <p>95 -111 Brighton Road – The site should be allocated for mixed use, including residential.</p> <p>Car park, 54-58 Whytecliffe Road South – any development should provide as many car parking spaces as there are there now.</p>	
Policy DM41: Sanderstead	<p>DM41.1 and DM41.2 – Concerned about intensification of both Sanderstead village and Hamsey Green.</p> <p>359-367 Limpsfield Road – The site should be allocated for a mixed use scheme of residential and commercial.</p>	<p>359-367 Limpsfield Road – has been allocated for a mixed use scheme of residential and commercial.</p> <p>No other changes to policy or sites.</p>

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	<p>Former Good Companions site – The site should be allocated for residential and not retail.</p> <p>Former Good Companions site – This should be retail only but with controlled access.</p>	
Policy DM42: Selsdon	Allocate Old Selsdon Garage on Addington Road	Old Selsdon Garage on Addington Road has been allocated for residential use with commercial use on the ground floor.
Policy DM43: Shirley	<p>Land on Shirley Oaks Road and rear of Honeysuckle Gardens – the land is owned entirely on behalf of the resident shareholders by a resident run management company (SOML) which is bound to preserve that space and which also has a specific object in its Memorandum of Association requiring it to resist any attempt to enforce regulations or plans which impact negatively on the estate. Regardless of its covenants in this regard it is understood that SOML has no wish to develop or to allow the development of the land in question. The gardens are all too small and the space is there to make up for small gardens. Also on the land to the west of Shirley Oaks Road coming from the Wickham Road there is a Synagogue. The Synagogue, their car park and frontage are owned by the Jewish Community and they have no plans to sell this land. The Synagogue is on consecrated land and is in fact</p>	<p>Sites 541, 542 and 548 (Land on Shirley Oaks Road and to rear of Honeysuckle Gardens) has been removed from the Plan as there is no willing landowner.</p> <p>Site 548 will become Local Green Space giving it the same level of protection as Metropolitan Green Belt and Metropolitan Open Land.</p> <p>Site 456 (Shirley Garden Centre) has been removed from the Plan as it is unlikely that it could be developed during the Plan period.</p> <p>Site 502 (Coombe Farm) will now be allocated for residential use as it is a previously developed site in the Metropolitan Green Belt but the landowner is not willing to sell the site for Gypsy and Traveller use. The provision of Gypsy and Traveller pitches will be made by expanding the existing site at Lathams Way and by allocating the Purley Oaks depot as a Gypsy and</p>

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	<p>the only Synagogue in Croydon. It is discriminatory to have identified this site without first consulting with the Board of Management.</p> <p>Land on Poppy Lane – The soil on which Shirley Oaks is located is of a clay type and is therefore impervious: another reason why it reacts to surface water flooding the way it does. The large area of grassland is ideal for ‘making room for water’ as a water storage area, thus to remove this pooling facility will mean the rain will have to find somewhere else to go, which would inevitably mean flooding for Shirley Oaks residents.</p> <p>Shirley Garden Centre – Shirley Garden Centre is identified as a potential housing allocation for 15 – 39 units. [Site owner] advises that the site is unlikely to be deliverable within the Plan period due to the presence of a number of long-leasehold flats on the site.</p> <p>Coombe Farm – development of site for Gypsy and Traveller pitches does not comply with Policy SP2.7.</p> <p>Coombe Farm – landowner does not wish to sell site for Gypsy and Traveller use.</p> <p>Stroud Green Pumping Station – no substantial objections but a lot of comments about it being a Gypsy and Traveller site (because it was once</p>	<p>Traveller site.</p> <p>Site 938 (Shrublands) has been removed from the Plan as there is no definitive boundary. Selected sites may be developed subject to planning permission as part of the Council New Build Programme.</p> <p>No other changes to policy or sites.</p>

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	<p>considered as such but not included in the Plan itself).</p> <p>Shrublands estate and the adjacent land to the east, south and west requires protection from further building other than housing on some redundant garages, for the benefit of local residents, especially younger children, as the density of occupation is high; the views from the existing upper storeys such as 170-224 ('The Ship') towards central London should be recognised and protected.</p> <p>Land opposite Shirley Oaks Hospital, Poppy Lane - The land is the freehold property of the shareholders of the Addiscombe Woodside and Shirley Leisure Gardens Ltd. On these grounds alone we object to its development. In addition to this, in recent years this land has been turned into a nature reserve, now home to numerous flora and fauna including, we understand protected species. This is a vital asset of the Society, much used by its members and visitors and previously prone to flooding before being properly managed.</p>	
Policy DM44: South Croydon	Normanton Park Hotel - The rear of the site should be considered for possible expansion of St. Peter's School, as it adjoins the school play areas. A separate suggestion that fewer houses are built, with space for more cars to park away from Normanton Road. The traffic	Site 661 (Coombe Nurseries) will not be allocated for a Gypsy and Traveller site as the noise from industrial machinery on an adjacent site means it is not suitable for any residential use. The provision of Gypsy and Traveller pitches will be made by expanding the existing site at Lathams Way

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	<p>flow on Normanton Rd is really awful now, mainly because most of the road space is taken up by parked cars. Visitors to, and residents in, the many relatively new flats tend to park on the street because parking area within the apartment complexes is inadequate.</p> <p>Coombe Nurseries - Transition Town have expressed an interest in restoring this site to a proper nursery facility, utilising the existing greenhouses for the growing of food, which would be a sustainable and appropriate activity within this green belt site. The group is very keen to register the site as an asset of community value and to present an alternative plan. Development of site for Gypsy and Traveller pitches does not comply with Policy SP2.7. If the site is to be allocated an alternative site should be found for the existing occupier.</p> <p>Coombe Nurseries – build a school and not Gypsy and Traveller pitches.</p> <p>Coombe Road Playing Field s – The site should not be allocated if it involves the loss of sports facilities or playing fields (Sport England).</p> <p>Coombe Road Playing Fields – The site should remain as Green Belt.</p> <p>Coombe Road Playing Fields – Wallington County</p>	<p>and by allocating the Purley Oaks depot as a Gypsy and Traveller site.</p> <p>No other changes to the policy or sites.</p>

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	<p>(Grammer) School is interested in the site and developing a new secondary school there.</p> <p>Coombe Road Playing Fields – Use the site to relocate and expand the existing Archbishop Tenison’s school.</p> <p>Coombe Road Playing Fields – can public transport and road network cope?</p>	
Policy DM45: South Norwood and Woodside	DM45.1 – A policy should be considered for Portland Road that would help to manage the return of retail units to residential use, thereby concentrating the retail offer.	This is covered by existing policies and designations of the Plan. No changes to the policy or sites (other than to remove sites under construction).
Policy DM46: Thornton Heath	<p>DM46.2 - Should avoid buildings up to 6 storeys unless they are on corner plots or landmark sites.</p> <p>585-603 London Road and 2 Dunheved Road should be included in Table 11.19 as 'Continued hotel use'.</p> <p>3B Torridge Road – Site has an active employment use on it and should not be allocated for residential development.</p> <p>Grass area adjacent to, 55 Pawsons Road – The loss of such green space in this densely populated area should be avoided.</p> <p>Grass area adjacent to, 55 Pawsons Road – Rowland Brothers would like to support the de-designation of this land as local open land, but with the addition of a car parking</p>	<p>Site 266 (3B Torridge Road) has been removed from the Plan as it is in use as a scattered employment site.</p> <p>A400 (Day Lewis House) is now proposed as a residential development as the lawful use is an office (Class B1a) which is not protected in this location.</p> <p>No other changes to the policy or sites.</p>

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	<p>area on the area (to provide space for their vehicles and customers and to avoid carrying coffins to vehicles parked on Northbrook Road). A petition has been submitted to support this.</p> <p>Croydon University Hospital site - Any shrinkage of the site to allow for residential development must very carefully consider the parking and infrastructure impact on an already densely 499 populated part of the borough.</p> <p>54 Northwood Road - A waste transfer site is not appropriate in a residential area and so site should be included in the list of preferred sites rather than an alternative option and preferred option should be residential. (Business is a skip hire business)</p> <p>Day Lewis House – Part of the site has prior approval for conversion from office to residential. Only ground floor has an industrial use. Other floors are a community use (without planning permission) and office. Therefore, it should be allocated for residential use as it is no different from other sites allocated as such.</p>	
Policy DM47: Waddon	<p>DM47.2 – The Plan should be updated to reflect the improvements to Five Ways (TfL).</p> <p>Concern about the large number of sites in Waddon in comparison to some other areas of the borough. They</p>	<p>Site 11 (Waddon Garden Centre) will no longer be allocated for a secondary school as there is no willing landowner. It is now proposed for residential use.</p> <p>No other changes to policy or sites.</p>

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	<p>object to both school sites (Waddon Garden Centre and Heath Clark). Concern about loss of popular and diverse shops along Purley Way. They support a masterplan for the area and a new local centre.</p> <p>Landowner of Waddon Garden Centre objects to its allocation as a school.</p> <p>Heath Clark – Croydon College wants it allocated for residential use alone as they don't need it for education purposes. CPRE is concerned about the loss of Local Open Land.</p> <p>Morrisons – number of homes on this site is questioned.</p> <p>Sea Cadets (the Waldrons) – the requirement for community use should be removed and the site should be allocated solely for residential as there has been no interest in the site.</p> <p>294-330 Purley Way – landowner says that a mix of retail, commercial and residential would not be deliverable since commercial tenants are seeking accommodation in Croydon centre rather than out of town and the values in residential accommodation would not be attractive enough in a strong-trading and established retail area.</p>	