

Representation Form for the Croydon Local Plan: Detailed Policies (Preferred and Alternative Options)

Representations should be returned to Croydon Council at the address overleaf by **midnight on Friday 6th December 2013**.

Part A

	Personal Details	Agent's Details (if applicable)
Title	Mrs	
First Name	Mira	
Last Name	Armour	
Job Title (where relevant)	Addiscombe Residents Associations Planning Group	
Organisation (where relevant)	Representing 9 RAs	
Address Line 1		
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Postcode		
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Telephone Number		

Do you wish to be notified of the following? (please tick as appropriate)	
Consultation on the Croydon Local Plan: Detailed Proposals	<input checked="" type="checkbox"/>

Signature: R M Sleeman pp Mira Armour	Date: 6 th December 2013
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Croydon Council will acknowledge receipt of your representation(s) as soon as possible. Please note that representations are not confidential and your names and comments will be made available for public inspection during all consultation stages in the preparation of the Local Plan: Detailed Policies. Your name and comments submitted to us by letter or online will be made available to view online, once your comments have been logged and accepted. However, your address and other contact details you submit will only be used for the purposes of sending out correspondence to you in relation to planning policy matters. We will not publish these details on the website or any other public place. You are advised to keep a copy of the representation(s) you submit.

You can download this representation form online at www.croydon.gov.uk/localplantwo along with the Croydon Local Plan: Detailed Policies (Preferred and Alternative Options) and its supporting documents. If you have any queries please contact the Spatial Planning Service on 020 8726 6000 or 020 8407 1385, or email ldf@croydon.gov.uk.

Please return completed forms to: Spatial Planning Service, 6th Floor Zone B, Bernard Weatherill House, 8 Mint Walk, Croydon, CR0 1EA or via email to ldf@croydon.gov.uk

Observation: There is a difference in page numbering for hard copy and web versions of document “att2671.pdf” – hard copy numbering has applies below.

Part B – please use a separate sheet for each representation

1. To which part of the Croydon Local Plan: Detailed Policies (Preferred and Alternative Options) does this representation relate?

Para/Page No. Policy Number Option

Appendix 6.

The 16 PoC for Addiscombe doesn't consider it needs 'Views and Landmarks'
It should be there in order to recognise Landmarks such as the former Ashburton Library, The Leslie Arms, East India Houses at corner of Addiscombe Road and Clyde Road, Churches and the Cattle Trough. These sit outside DM29.2 & DM29.1 and should be recognised as landmarks.

- 2.0 For each policy or subject please comment on the following questions:

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

YES NO

Please state your reasons:

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

- 2.2 Do you think that the preferred policy approach is deliverable?

YES NO

Please state your reasons:

In Addiscombe Place – there are no views?

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

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

YES NO

Please state your reasons:

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

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2. To which part of the Croydon Local Plan: Detailed Policies (Preferred and Alternative Options) does this representation relate?

Para/Page No. Policy Number Option

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

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

YES NO

Please state your reasons:

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

2.2 Do you think that the preferred policy approach is deliverable?

Questionable YES NO

Please state your reasons:

In the light of experience of the generally dismal quality of domestic architecture in this country since about 1930, the council will have to be very strong with developers to achieve a higher standard. One has only to look at the design of quite recent infilling blocks of flats to see how little has been secured so far.

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

YES NO

Please state your reasons:

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Please comment Para/Page No. Policy Number Option read the below as

Comment:

DM29.1 a "Blackhorse Road" is referred to in the document but I presume this to mean Blackhorse Lane.

DM29.1 b Agree strongly that ground floor frontages should remain active and un-obscured. Additionally, however, while the rhythm of the separate individual buildings is attractive and beneficial, it should not preclude separate ground floor units from being joined where this may make a business more viable or where an already successful business may hope to expand. Some of the smaller business units may be too small to practically allow even a small business to successfully operate, with the result that the unit may remain empty, indefinitely, and thereby breaking the rhythm. The safe-guard in retaining the rhythm would be maintained by further guidelines being established in relation to the joining of separate units sympathetically.

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

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

YES NO

Please state your reasons:

2.2 Do you think that the preferred policy approach is deliverable?

YES NO

Please state your reasons:

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

YES NO

Please state your reasons:

Part B – please use a separate sheet for each representation

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Para/Page No. Policy Number Option

- 2.0 For each policy or subject please comment on the following questions:

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

YES NO

Please state your reasons:

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

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

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

- 2.2 Do you think that the preferred policy approach is deliverable?

YES NO

Please state your reasons:

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

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

YES NO

Please state your reasons:

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

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

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

Access by foot from the south would benefit from safer crossing points in Bingham Road and in extra crossing points in Lower Addiscombe Road close to Baring Road and Inglis Road.

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

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

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

The variety of traders on Lower Addiscombe Road between Gloucester Road and Morland Road and in Cherry Orchard Road perhaps offer a wider variety, however the UDP section that defines that shopping parade has not been included in the current plan. Within "Addiscombe" the two major parades should be listed and protected. Additional small parades exist in two places in Shirley Road for example and these are not listed in the UDP or in the new plans but they merit similar protection.

Part B – please use a separate sheet for each representation

1. To which part of the Croydon Local Plan: Detailed Policies (Preferred and Alternative Options) does this representation relate?

Para/Page No. Policy Number Option

Observation: Section 11.18 wrongly list shops at Chepstow/Addiscombe Road.

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

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

YES NO

Please state your reasons:

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

- 2.2 Do you think that the preferred policy approach is deliverable?

YES NO

Please state your reasons:

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

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

YES NO

Please state your reasons:

The current version is not in enough detail to properly identify the exact locations and therefore is impossible to “agree”. The use of colour shades that are indistinct and are not overlaid with a road network as shown below is not fit for purpose.



For example it seems to show the St Mildred's site as an institution with associated grounds, this probably relates to the Roman Catholic Church in Bingham Road and the small chapel also on Bingham Road. However it is not at all clear what the fourth area to the south of Bingham Road is.

The Scout hut in Craven Road is not marked. St Mary Magdalene Church in Canning Road is not marked and the Methodist Church in Lower Addiscombe Road looks an odd shape.

What is the significance of the red line running to the east of the Methodist church?

The checkerboard areas close to the Methodist church are I assume Harris & Bailey and the Tesco Petrol station, but what is the third small one? The key does not appear to include that pattern.

The flats adjacent to St Mildred's are shown as "mixed type flats" but they are actually designed and sold as retirement homes – whatever does "mixed type flats" mean? In Ashburton Avenue there seems to be a mix of these pink flats and mauve "large houses on relatively small plots" many of which are actually split in flats which are indeed very "mixed".

If this lack of clarity is allowed across the whole of Addiscombe (and indeed the whole of Croydon) there is no planning clarity at all.

Section 11.18 wrongly list shops at Chepstow/Addiscombe Road.

"The non-residential character consists of "Urban Shopping Areas" (concentrated along the Lower Addiscombe Road corridor and Chepstow/Addiscombe Road); and "Industrial Estates" within the interiors of blocks, interlaced with houses."

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

There may be more benefit in a plan that shows, in some detail street by street, the type of residential property that makes up the defined types in the key in appendix 9. That way we might identify the density of one, two, three bedroom flats, terraced houses and larger properties not subdivided into flats by location. This could indicate where there is capacity for higher density housing and the related requirement for infrastructure (schools, open spaces, health clinics, shops, transport etc.).

This plan must go back to the drawing board.

Part B – please use a separate sheet for each representation

1. To which part of the Croydon Local Plan: Detailed Policies (Preferred and Alternative Options) does this representation relate?

Para/Page No.	<input type="text" value="11- 11.7"/> <input type="text" value="135-137"/>	Policy Number	<input type="text"/>	Option	<input type="text"/>
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Section 11: The Places of Croydon

- 2.0 For each policy or subject please comment on the following questions:

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

YES

NO

Please state your reasons:

The “Areas” of Croydon appear to have been selected for reasons other than planning. Specifically “Addiscombe” comprises a wide mix housing types, population density, character and age of properties, mix of council and private dwellings and schools, open spaces and community centres e.g. churches. However the area is far too large to have any practical mechanism for public consultation afforded by ward boundaries or Residents’ Associations.

This planning exercise appears to be political rather than practical as it fails to engage with the residents. For example in the ASPRA area I have seen only a single response from a resident, who was clearly confused by the whole process.

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

Ward Councillors appear to have been excluded from meetings, but they are the democratically elected representatives.

The boundary issues between the “Addiscombe” area and central Croydon are confused by discrepancies between maps where, for example, the Post Office Sorting centre adjacent to East Croydon station appears to be located in two “areas”. From a planning perspective the development of a 20 floor tower block of flats on that site fits well with the regime for central Croydon but is inappropriate for “Addiscombe”. There is a clear lack of infrastructure (schools, medical facilities, open spaces and community centres) and no available land on which to create the infrastructure. So why allow any further development?

Looking at the area represented by the ASPRA the atmosphere is mainly well built and architecturally individual 1900s to 1930s dwellings with generous gardens and some green space. However there is a lack of school or significant medical centre within the boundary. The western side is being developed into shared accommodation in an unplanned piecemeal scenario, where landlords/freeholders are allowed to make a quick kill on property which is attractive because of the transport infrastructure. Much of the community services are provided by the churches, while the Recreation Ground has been allowed to deteriorate with lack of investment and no restoration of the public toilets. One fears that within the next 30 years much of the property will be of such low energy efficiency that massive redevelopment

of higher density homes will be permitted. By then it may be illegal to own a petrol/diesel powered car, so parking will not be the issue it is today.

2.2 Do you think that the preferred policy approach is deliverable?

YES

NO

Please state your reasons:

It is not a natural “area” and is an attempt to define a community that does not in reality exist. It will be an administrative functionality that contradicts the ward boundaries and will disenfranchise the residents.

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

YES

NO

Please state your reasons:

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

Part B – please use a separate sheet for each representation

1. To which part of the Croydon Local Plan: Detailed Policies (Preferred and Alternative Options) does this representation relate?

Para/Page No. Policy Number Option

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

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

YES NO

Please state your reasons:

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

As far as it impacts “Addiscombe” the lack of car parking space, when large older property is converted into multiple flats, blocks roads and junctions and makes it difficult for service vehicles (e.g. street cleaning, gulley cleaning) to gain access. The infrastructure therefore deteriorates and there is a general build-up of rubbish. Of course we will meet the objectives of this policy at a cost to the community.

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

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

- 2.2 Do you think that the preferred policy approach is deliverable?

YES NO

Please state your reasons:

It will be deliverable where new-builds are concerned.

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

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

YES NO

Please state your reasons:

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

Part B – please use a separate sheet for each representation

1. To which part of the Croydon Local Plan: Detailed Policies (Preferred and Alternative Options) does this representation relate?

Para/Page No. Policy Number Option

Please include reference to National Guideline SP7.4 (Biodiversity)

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

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

YES NO

Please state your reasons:

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

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

- 2.2 Do you think that the preferred policy approach is deliverable?

YES NO

Please state your reasons:

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

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

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

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

YES NO

Please state your reasons:

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

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

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1. To which part of the Croydon Local Plan: Detailed Policies (Preferred and Alternative Options) does this representation relate?

Para/Page No. Policy Number Option

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

Please add to Option 1

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

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

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

YES NO

Please state your reasons:

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

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

- 2.2 Do you think that the preferred policy approach is deliverable?

YES NO

Please state your reasons:

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

Increase of density means decrease in quality of living.

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

Some residents will see this as an attractive investment plan.

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

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

YES NO

Please state your reasons:

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

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

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

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

YES NO

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

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

The Addiscombe Road is an artery leading into central Croydon and needs to be retained and protected to avoid the damage done to properties on other arteries, particularly to the north.

The Whitgift Estate contains some individual properties of architectural merit. It has an ambience unique within this part of Croydon.

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

YES NO

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

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

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

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

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

YES NO

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

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

YES NO

Please state your reasons:

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

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

Continue on a separate sheet as necessary.

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

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

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

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

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