## Croydon Local Plan: Strategic Policies (Partial Review) and Detailed Policies and Proposals evidence base

**Technical Paper – Green Grid** 

2016



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## 1. Introduction

- 1.1. This technical paper sets out and discusses the policy context and evidence that have informed policy SP6 of the Croydon Local Plan: Strategic Policies Partial Review (Proposed Submission) and Policies DM27, DM28 and DM29 of the Croydon Local Plan: Detailed Policies and Proposals (Proposed Submission).
- 1.2. Section 2 states the relevant policy context (national, regional and local). Sections 3 to 6 state the proposed policies and an explanation of how the supporting evidence has been used to inform the policy with reference to the policy context. For further information on the individual pieces of evidence it is recommended that you look at the evidence documents themselves which can be found at:
  - www.croydon.gov.uk/planningandregeneration/framework/lpevidence.

### 2. Where we are now

- 2.1 The key issues, taken from the the Croydon Local Plan: Strategic Policies, that the borough faces in terms of planning for green space up to 2031 are:
  - 50% of the borough's residential areas are located more than 400m from a local park.
  - Pressure on existing green spaces and play areas are likely to increase with the levels of growth planned for urban areas in the borough.
  - Croydon lacks areas of open water e.g. lakes, rivers and large ponds.
  - Due to limited land availability there are significant gaps in the access to nature in the northern parts of the borough.
  - There is a combined allotment waiting list across Croydon of approximately 600 people.

#### **Policy Context**

#### **National Planning Policy**

- 2.2 The National Planning Policy Framework (NPPF) states that the Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. It sets out the five purposes of Green Belt and states that inappropriate development is by definition harmful to the Green Belt and should not be approved in except in very special circumstances. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations. Paragraphs 89 and 90 of the NPPF sets out the exceptions to what is considered to be inappropriate development.
- 2.3 Local communities through local and neighbourhood plans should be able to identify for special protection green spaces of particular importance to them. Identifying land as Local Green Space should be consistent with sustainable development principles and should only be used:
  - Where the green space is in reasonably close proximity to the community it serves;
  - Where the green space is demonstrably special to a local community and holds particular local significance; and
  - Where the green area concerned is local in character and is not an extensive tract of land.
- 2.4 Local policy for managing development within a Local Green Space should be consistent with policy for Green Belts.
- 2.5 The planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, geological conservation interests and soils. The impact on biodiversity should be minimised. Local planning authorities should set criteria based policies against which proposals for any development on or affecting protected wildlife, geodiversity sites or landscape areas will be judged.
- 2.6 Planning policies should identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity.

#### The London Plan

2.7 The London Plan sets out (in Policy 7.16) the strongest protection which should be given to London's Green Belt, in accordance with national guidance. In particular the Mayor strongly supports the current extent of London's Green Belt, its extension in appropriate circumstances and its protection from inappropriate development. Inappropriate development should be refused, except in very special circumstances.

- 2.8 The strongest protection should also be given to Metropolitan Open Land (Policy 7.17 of the London Plan) and should be given the same level of protection as Green Belt. In particular the Mayor strongly supports the current extent of Metropolitan Open Land (MOL), its extension in appropriate circumstances and its protection from development having an adverse impact on the openness of MOL.
- 2.9 Development proposals should make a positive contribution to the protection, enhancement, creation and management of biodiversity. Local Plans should include policies and proposals for the protection of protected/priority species and habitats.
- 2.10 Policy 2.17 Trees and Woodlands sets out that trees and woodlands should be protected, maintained and enhanced, following the guidance of the London Tree and Woodland Framework. Boroughs should develop appropriate policies to implement their borough tree strategy.

#### **Local Planning Policy**

2.11 The Croydon Local Plan: Strategic Policies contains three strategic objectives that are relevant to the Green Grid policies, as follows:

Strategic Objective 7: Conserve and create spaces and buildings that foster safe, healthy and cohesive communities.

Strategic Objective 8: Improve accessibility, connectivity, sustainability and ease of movement to, from and within the borough.

Strategic Objective 10: Improve the quality and accessibility of green space and nature, whilst protecting and enhancing biodiversity.

#### 3. SP7: Green Grid

3.1 The wording of Policy SP7 of the Croydon Local Plan: Strategic Policies (Proposed Submission) is unchanged from the adopted version. However there have been a number of changes to boundaries of the designations set by Policy SP7.

## Review of boundaries of Metropolitan Green Belt and Metropolitan Open Land

- 3.2 National policy guidance states that when reviewing its Plan, Council needs to have the correct designations for Metropolitan Open Land, Green Belt and Local Green Spaces in accordance with the criteria set out in national policy. Therefore a review of the open spaces has been undertaken to ensure that designations are correctly assigned in accordance with national and London policy criteria.
- 3.3 The key evidence used to inform the amendments to designation of land as Green Belt, Metropolitan Open Land and identification of Local Green space, in accordance with the national and London Plan policy guidance and criteria are:
  - Review of potential Local Green Spaces (2013)
  - Extensions to the Green Belt Assessment (2013)
  - Green Belt and Metropolitan Open Land Review (2016)
- 3.4 The relevant NPPF and London Plan guidance used to inform the review of the Green Belt and Metropolitan Open Land are set out below. The criteria used to inform the review of potential green spaces is discussed under policy DM27 in this paper.

#### **Green Belt Land**

3.5 Policy 7.16 of the London Plan relates to Green Belt Land. The National Planning Policy Framework gives clear policy guidance on the functions the Green Belt performs, its key

characteristics, acceptable uses and how its boundaries should be altered, if necessary (paras 79-92). Green Belts serve five purposes:

- Check the unrestricted sprawl of large built-up areas;
- To prevent neighbouring towns merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns; and
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

3.6 When defining boundaries of Green Belts, the NPPF (para 58) states that local planning authorities should:

- Ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
- Not include land which it is unnecessary to keep permanently open;
- Where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
- Make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;
- Satisfy themselves that Green Belt boundaries will not need to be altered at the end
  of the development plan period; and
- Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

#### **Metropolitan Open Land**

3.7 Policy 7.17 of the London Plan states that to designate land as Metropolitan Open Land, boroughs need to establish that the land meets at least one of the following criteria:

- a) It contributes to the physical structure of London by being clearly distinguishable from the built up area; or
- b) It includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London; or
- c) It contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value; and
- d) It forms part of a Green Chain or a link in the network or green infrastructure and meets one of the above criteria (a-c).

#### Conclusions of the review of boundaries

- 3.8 The review identified three areas of land that did not meet the nationally set requirements for designation as Metropolitan Green Belt and one area of land that did not meet the requirements set out in the London Plan for designation as Metropolitan Open Land.
- 3.9 Three areas of land were found to only meet one test, namely assisting with the urban regeneration of Croydon by encouraging the recycling of brownfield land for designation as Metropolitan Green Belt. These areas were Purley Downs, Croham Hurst golf course and Sanderstead Plantation. However every area of protected open space in Croydon meets this test and the National Planning Policy Framework explicitly states (in paragraph 79) that the fundamental aim of Metropolitan Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Metropolitan Green Belt is its openness and its permanence. Therefore, the encouraging the recycling of brownfield land on its own it

is not considered suitable to justify a Metropolitan Green Belt designation unless if forms part of a wider area that checks the unrestricted sprawl of London as a whole.

- 3.10 Croham Hurst (beyond the golf course) itself also fails to prevent urban sprawl because, although it meets two tests for designation as Metropolitan Green Belt (preserving the setting and special character of Croydon's heritage; and assisting with the urban regeneration of Croydon by encouraging the recycling of brownfield land), it too does not check the unrestricted sprawl of London as a whole and is not part of a wider open tract of land.
- 3.11 These represent the exceptional circumstance required by the National Planning Policy Framework to alter the Metropolitan Green Belt designation in these locations, namely that they are inappropriately designated as Metropolitan Green Belt. However, these three areas all meet at least one of the tests for designation as Metropolitan Open Land or Local Green Space and therefore, even though they do not meet the tests for designation as Metropolitan Green Belt (although they are currently designated as such), they should be redesignated as Metropolitan Open Land or Local Green Space to ensure that they continue to benefit from the same high level of protection as Metropolitan Green Belt.
- 3.12 The review of the borough's Metropolitan Green Belt also identified 16 areas of Local Open Land abutting Metropolitan Green Belt that should be re-designated as Metropolitan Green Belt. Furthermore the review identified three areas of Local Open Land abutting two of the areas of Metropolitan Green Belt that did not meet the nationally set requirements for designation as Metropolitan Green Belt. These three areas of Local Open Space are proposed to be re-designated as Metropolitan Open Land instead. None of the areas of land are suitable to be designated as Local Green Space because one of the key criteria for designation as Local Green Space is that the land must be local in character and not part of an extensive tract of land. The table below sets out the proposed changes to designations and the criteria for either Metropolitan Green Belt or Metropolitan Open Land that they meet:

Site name	Metropolitan Green Belt criteria met	Metropolitan Open Land criteria met
Addington Vale	Checks the unrestricted sprawl of London  Assist in the regeneration by encouraging the recycling of derelict and urban land	-
Bradmore Green, Old Coulsdon	Checks the unrestricted sprawl of London  Preserve the setting and special character of the heritage of Croydon  Assist in the regeneration by encouraging the recycling of derelict and urban land	-
Coulsdon Iron Railway Embankment	Checks the unrestricted sprawl of London  Preserve the setting and special character of the heritage of Croydon  Assist in the regeneration by encouraging the recycling of derelict and urban land	-

Site name	Metropolitan Green Belt criteria met	Metropolitan Open Land criteria met
Courtwood Playground	Checks the unrestricted sprawl of London	
Flayground	Assist in the regeneration by encouraging the recycling of derelict and urban land	-
Extension of Bradmore Green	Checks the unrestricted sprawl of London	
Diadillore Green	Assist in the regeneration by encouraging the recycling of derelict and urban land	-
Land at Rogers Close, Old	Checks the unrestricted sprawl of London	
Cousidon	Prevent Croydon from merging with towns in neighbouring local authorities	
	Safeguard Croydon's countryside from encroachment	-
	Assist in the regeneration by encouraging the recycling of derelict and urban land	
Land between The Bridle Way and	Checks the unrestricted sprawl of London	
Selsdon	Prevent Croydon from merging with towns in neighbouring local authorities	
	Safeguard Croydon's countryside from encroachment	-
	Assist in the regeneration by encouraging the recycling of derelict and urban land	
Land between Vale Border and	Checks the unrestricted sprawl of London	
Selsdon	Prevent Croydon from merging with towns in neighbouring local authorities	
	Safeguard Croydon's countryside from encroachment	-
	Assist in the regeneration by encouraging the recycling of derelict and urban land	
Land in Tollers	Checks the unrestricted sprawl of London	
Lane	Assist in the regeneration by encouraging the recycling of derelict and urban land	-
Land off Lower Barn Road	-	Contributes to the physical structure of London

Site name	Metropolitan Green Belt criteria met	Metropolitan Open Land criteria met
Land on Riddlesdown Road	Checks the unrestricted sprawl of London	
Riddlesdown Road	Prevent Croydon from merging with towns in neighbouring local authorities	
	Safeguard Croydon's countryside from encroachment	-
	Assist in the regeneration by encouraging the recycling of derelict and urban land	
Land SW of Cudham Drive,	Checks the unrestricted sprawl of London	
Flora Gardens and Corbett Close, New	Prevent Croydon from merging with towns in neighbouring local authorities	
Addington	Safeguard Croydon's countryside from encroachment	-
	Assist in the regeneration by encouraging the recycling of derelict and urban land	
Land to rear of	Checks the unrestricted sprawl of London	
Goodenough Close, Middle Close and Weston	Prevent Croydon from merging with towns in neighbouring local authorities	
Close, Old Coulsdon	Safeguard Croydon's countryside from encroachment	-
	Assist in the regeneration by encouraging the recycling of derelict and urban land	
Land to south of Croham Hurst	-	Contributes to the physical structure of London
Milne Park	Checks the unrestricted sprawl of London	
	Assist in the regeneration by encouraging the recycling of derelict and urban land	-
St Edmund's Church Green	-	Contributes to the physical structure of London
St John the	Checks the unrestricted sprawl of London	
Evangelist's churchyard, Old Coulsdon	Preserve the setting and special character of the heritage of Croydon	-
	Assist in the regeneration by encouraging the recycling of derelict and urban land	

Site name	Metropolitan Green Belt criteria met	Metropolitan Open Land criteria met
Sanderstead Recreation Ground	Checks the unrestricted sprawl of London	
	Assist in the regeneration by encouraging the recycling of derelict and urban land	-
The Bridle Road, Shirley	Checks the unrestricted sprawl of London	
,	Prevent Croydon from merging with towns in neighbouring local authorities	
	Safeguard Croydon's countryside from encroachment	-
	Assist in the regeneration by encouraging the recycling of derelict and urban land	

3.13 Overall whilst the wording of Policy SP7 is retained as adopted, the designations on the Policies Map accompanying the Croydon Local Plan: Strategic Policies have been reviewed and amended as summarised in the table below:

Location	Designation changed from Metropolitan Green Belt to Metropolitan Open Land	Designation changed from Metropolitan Green Belt to Local Green Space	Additions to Metropolitan Green Belt	De-designation of Metropolitan Open Land that does not meet the criteria for designation
Addington Vale			✓	
Bradmore Green, Old Coulsdon			✓	
Coulsdon Iron Railway Embankment			✓	
Courtwood Playground			✓	
Croham Hurst	✓			
Land at Rogers Close, Old Coulsdon			✓	
Land at Shirley Oaks				✓
Land between The Bridle Way and Selsdon			<b>√</b>	
Land between Vale Border and Selsdon			<b>✓</b>	
Land in Tollers Lane			✓	
Land off Lower Barn Road			✓	
Land on Riddlesdown Road			<b>√</b>	

Location	Designation changed from Metropolitan Green Belt to Metropolitan Open Land	Designation changed from Metropolitan Green Belt to Local Green Space	Additions to Metropolitan Green Belt	De-designation of Metropolitan Open Land that does not meet the criteria for designation
Land SW of				
Cudham Drive,				
Flora Gardens			<b>✓</b>	
and Corbett			•	
Close, New				
Addington				
Land to rear of				
Goodenough				
Close, Middle			<b>√</b>	
Close and			•	
Weston Close,				
Old Coulsdon				
Land to south of			<b>✓</b>	
Croham Hurst			·	
Milne Park			✓	
Purley Downs	✓			
St Edmund's			<b>√</b>	
Church green			,	
St John the				
Evangelist's			<b>✓</b>	
churchyard, Old			,	
Coulsdon				
Sanderstead		✓		
Plantation		<u> </u>		
Sanderstead				
Recreation			✓	
Ground				
The Bridle			<b>✓</b>	
Road, Shirley				

## **Sustainability Appraisal**

- 3.14 The 2011 Strategic Policies Sustainability Appraisal Report predicted that the spatial strategy would lead to positive effects on the basis that the policy "does not identify any proposed growth within areas of greenspace and the supporting text of the policy seeks to ensure that brownfield land is always considered for development in the first instance". The report also concluded that "A large number of policies seek to provide protection or enhancement of open space and biodiversity. For example while specific protection is given to designated sites, policies also encourage the extension and enhancement of the Green Grid and the establishment of Urban Blue Corridors i.e. overland flow paths, ponding areas, flood storage areas, etc. Cumulatively these policies will provide protection and enhancement for biodiversity".
- 3.15 Policy SP7 (Green Grid) was a particular focus of the SA (2011), stating that: "The policy seeks to enhance access to the Green Grid for all and maximise opportunities for connectivity across the borough, but particularly in areas which are currently deficient in access to nature and/or have restricted access to public recreational space and play areas... High quality green spaces also go a long way to encouraging people to pursue healthier lifestyles through exercise through exercise such as walking, cycling and active children's play".
- 3.16 The SA (2015) states that the partial review does not set out to alter any biodiversity related policies, and it is unlikely to be the case that the minor shift in spatial strategy reflected in the Partial Review will have implications for biodiversity.

### **Health Impact Assessment**

- 3.17 The health Impact Assessment (HIA) (May 2016) identifies the positive impacts of SP7 on health and wellbeing as:
  - Creation of a multi-functional network of open spaces ensures that different groups are able to use open spaces for uses such as physical activity, recreation, interaction with others.
  - Access to open space can be therapeutic for those with poor mental health or substance misuse issues.
  - Encouragement of food growing offers growth of local, healthy food and provides therapeutic activities.
- 3.18 The HIA identifies that the negative impacts of SP7 on health and wellbeing are that the de-designation of some open spaces does not take account of whether an area is deficient in open space. This could mean some groups may no longer have access to open space for physical activity or for interaction with others which is a particular issue for those who cannot afford to travel or those with mobility problems.
- 3.19 Given the above, the HIA recommends the following:
  - Supporting text should make reference to health and wellbeing, particular access to open spaces which are accessible for all and provide affordable places for physical activity.
  - When assessing the potential loss of open spaces an assessment should be made as to whether the area is already deficient in open space.
  - Suitability of areas for food growing should be assessed to ensure opportunities are safe and have been assessed for pollutants or land contamination, particularly if close to industrial areas.
  - An assessment should be made as to whether any of the green chain networks could be used to link with cycle routes to encourage access to open space and physical activity.
- 3.20 The Green spaces section of CLP1.1 implicitly sets out the importance of green spaces and access to the borough's health and wellbeing. Policy SP7, alongside London Plan and national policy provide for the protection of the borough's green spaces. Opportunities for food growing are encouraged and the context is set out in paragraph 6.21 of CLP1.1. Policy SP8 Transport and Communication provides the policy context how sustainable transport movement can be achieved to provide access to open spaces and the Infrastructure Delivery Plan includes the interventions / projects planned.

# 4. Policy DM27: Metropolitan Green Belt, Metropolitan Open Land and Local Green Spaces

4.1 This section of the technical paper looks at Policy DM27 of the Croydon Local Plan: Detailed Policies and Proposals (Proposed Submission) and sets out the evidence and methodologies underpinning the proposed policy, and how this relates to the broader policy context.

**DM27.1** The Council will protect and safeguard the extent of the borough's Metropolitan Green Belt, Metropolitan Open Land and Local Green Spaces as designated on the Policies Map by applying the same level of protection afforded to Metropolitan Green Belt in national planning policy to Metropolitan Open Land and Local Green Spaces in the borough.

**DM27.2** Extensions to existing buildings in Metropolitan Green Belt, Metropolitan Open Land and Local Green Spaces should not be more than 20% of their original floor space or volume, or 100m<sup>2</sup> (whichever is the smaller) unless they are for agricultural use, forestry, or facilities for outdoor sport, outdoor recreation or cemeteries.

**DM27.3** Extensions to existing buildings in Metropolitan Green Belt, Metropolitan Open Land and Local Green Spaces that are less than 20% of the original floor space or volume, or less than 100m² in extent (whichever is the smaller) and extensions for agricultural use, forestry, or facilities for outdoor sport, outdoor recreation or cemeteries may still be disproportionate. In considering whether they are disproportionate and also whether a new replacement dwelling is materially larger or, if any proposed structure harms the openness of Metropolitan Green Belt, Metropolitan Open Land or Local Green Spaces, the Council will have regard to:

- a) Changes in the floor space and volume of buildings;
- b) The floor space and volume of all previous extensions (since 1948), alterations and developments within the curtilage of the dwelling;
- c) Use of basements and roof spaces as living areas;
- d) Whether there is an increase in the spread of buildings across the site, in particular where visible from public vantage points;
- e) The size of the curtilage and character of the surrounding area; and
- f) Whether ancillary structures have an urbanising effect.

## How the policy works/key evidence

4.2 Similar to SP7, The key evidence to inform policy DM27 is:

- Review of potential Local Green Spaces (2013)
- Extensions to the Green Belt Assessment (2013)
- Green Belt and Metropolitan Open Land Review (2016)
- 4.3 The policy sets out the weight given to Metropolitan Green Belt, Metropolitan Open Land and Local Green Spaces in the borough. It sets the threshold for assessing extensions and sets out how proposals will be assessed to determine whether they are disproportionate or whether a replacement dwelling is materially larger.
- 4.4 Metropolitan Open Land and Local Green Spaces are given the same level of protection as Metropolitan Green Belt in accordance with the London Plan and the NPPF.
- 4.5 The NPPF states that extensions or alterations to a building are not considered to be inappropriate development, providing it does not result in disproportionate additions over and above the size of the original building. In assessing whether an extension or alteration is disproportionate a threshold of 20% of the original floorspace or volume or 100m² (whichever is the smallest) has been selected because it is considered any more of this would be disproportionate and would impact on the openness of the Green Belt.

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<sup>&</sup>lt;sup>1</sup> The original floor space and volume is as built, or as existed in 1948 for all buildings built prior to this date.

4.6 Buildings for agricultural use, forestry or facilities for outdoor sport, outdoor recreation or cemeteries are excluded as these are not considered inappropriate development in the Green Belt but are required to still preserve the openness of the Green Belt and not conflict with the purposes of including land within it.

#### **Local Green Spaces**

- 4.7 The Replacement Unitary Development Plan (2006) identifies sites of Local Open Land. In preparation for the Detailed Policies (Preferred and Alternative Options) a full assessment of the Local Open Land was undertaken to assess whether these sites met the criteria for Local Green Space. The criteria was developed against the requirements of the NPPF requiring Local Green Spaces to be in close proximity to the community it serves, to be demonstrably special or holds particular local significance and is local in character. In order to be designated as Local Green Space, the Local Open Land needed to be:
  - In close proximity to the community it serves;
  - In local character and not part of an extensive tract of land; and
  - Are at least three of the following or publically accessible and one of the following:
    - (a) Historic Park or Garden:
    - (b) Community Garden;
    - (c) Children's play area;
    - (d) Tranquil area;
    - (e) Natural and semi-natural open space;
    - (f) Cemetery, church yard or burial ground;
    - (g) Site of Nature Conservation Importance; or
    - (h) Playing field or recreation ground
- 4.8 Sites are required to be at least three of the above or one of the above and publically accessible to prove they are demonstrably special or hold particular local significance.

Table 4.1 Local Green Spaces Detailed Policies (Preferred and Alternative Options -2013)

Local Croon Spaces	2013)		
Local Green Spaces		Local Green Spaces	
2000 010011 0 pacco		Todai Olodii Opado	
79		79	
		10	

4.9 During the November-December 2015 consultation on the Detailed Policies (Preferred and Alternative Options) additional sites were suggested. These were assessed and all met the criteria for Local Green Space. The full review of Metropolitan Green Belt and Metropolitan Open Land also identified that Sanderstead Plantation should be re-designated as Local Green Space.

Table 4.2 Local Green Spaces Detailed Policies and Proposals (Preferred and

Alternative Options)		
	Local Green Spaces	
	85	

Following the November - December 2015 consultation an additional nine sites were 4.10 suggested. These were assessed and 3 met the criteria for Local Green Space and one existing site was extended.

Table 4.3 Local Green Spaces Proposed Submission			
Local Green Spaces			
88			

Appendix 1 shows the details of all the locations considered as potential Local Green Spaces in the borough and the reason why they are either proposed or not proposed for this designation.

- 4.12 The SA (2015) states that the biodiversity related policies are not significantly altered thus the minor shift in spatial strategy reflected above is unlikely to have implications for biodiversity. In addition, green space (particularly trees) can help to moderate peak temperatures in urban areas, helping to mitigate the high temperatures that are projected as a consequence of climate change. The policy therefore contributes to the borough's resilience to climate change.
- 4.13 The HIA (2015) states that protecting of Metropolitan Open Land and Local Green Spaces which are often closer to residential areas will allow access to open space which is accessible by walking and cycling. This is particularly important for children and young people, those with poor mental health, people who are isolated and those who cannot afford to use other facilities for physical activity. Open spaces provide opportunities for social interaction, physical activity and recreation.
- 4.14 No negative impacts on health and wellbeing were identified in the HIA, however it recommends that the supporting text to Policy DM27 refers to health and wellbeing. However, as CLP2 and CLP1.1 are to read as a whole, it is considered that Policy SP7 of CLP1.1 addresses the positive impact of the borough's Green Grid on health and wellbeing.

# 5. Policy DM28: Protecting and enhancing our biodiversity

5.1 This section of the technical paper looks at Policy DM28 of the Croydon Local Plan: Detailed Policies and Proposals (Proposed Submission) and sets out the evidence and methodologies underpinning the proposed policy, and how this relates to the broader policy context.

To enhance biodiversity across the borough and improve access to nature, development proposals should:

- a) Incorporate biodiversity on development sites to enhance local flora and fauna and aid pollination locally;
- b) Incorporate biodiversity within and on buildings in the form of green roofs, green walls or equivalent measures;
- c) Incorporate productive landscapes in the design and layout of buildings and landscaping of all major developments<sup>2</sup>;
- d) Have no adverse impact on land with biodiversity or geo-diversity value as designated on the Policies Map; and
- e) Have no adverse impact on species of animal or plant or their habitat protected under British or European law, highlighted within a local/regional Biodiversity Action Plan, or when the Council is presented with evidence that a protected species would be affected.

## How the policy works/key evidence

- $5.2\,$  The key evidence that informed Policy DM28 is the Review of Sites of Nature Conservation Importance (2013 and 2014).
- 5.3 The requirement for developments to have no adverse impact on land with biodiversity or geo-diversity value or on species of animal or plant or their habitat protected under British or European law is in accordance with the NPPF. All sites are given the same level of protection.
- 5.4 The London Plan requires boroughs to protect existing allotments and recommends that they identify other potential spaces that could be used for commercial food production or for community gardening. For the Detailed Policies (Preferred and Alternative Options) requirement for including food growing was set out in a policy on Productive Landscaping. Following consultation responses this policy was incorporated into biodiversity to ensure it

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<sup>&</sup>lt;sup>2</sup> Developments of 10 or more residential units, 1,000m<sup>2</sup> or more of non-residential floor space or sites more than 0.5ha in extent.

was deliverable. It also links well to biodiversity as measures that can be used to increase biodiversity, such as green roofs and walls, can also be used for food growing opportunities.

#### **Sites of Nature Conservation Importance**

5.5 The Replacement Unitary Development Plan (2006) identifies 74 Sites of Nature Conservation Importance (SNCIs). These designations were based on assessments and surveys which date to 1997 and identified:

- 13 Sites of Metropolitan Importance within the context of Greater London;
- 19 Sites of Borough Importance Grade I;
- 25 Sites of Borough Importance Grade II; and
- 17 Sites of Local Importance.

5.6 These designations have been re-assessed to ensure they are up to date, with the exception of the 13 Sites of Metropolitan Importance. In addition, the assessment looked to identify whether there are any additional sites which meet the criteria. This included 9 sites which were suggested during the consultation on the Detailed Policies (Preferred and Alternative Options). All site evaluations were based strictly on ecological criteria and ecological evidence from field surveys. No other factors were taken into account, such as the value of the site providing access to nature for local communities.

5.7 An assessment for each SNCI contained the following information:

- Size:
- Habitat diversity;
- Habitat structure:
- Habitat condition, current land use and management;
- Dominant plant species and notable plant species; and
- Evidence of fauna and potential for species of conservation concern.

5.8 The following criteria was used for each site:

- Size or extent
- Diversity/species richness
- Naturalness/Ancient character and recreatability
- Rare of exceptional ecological features
- Typicalness
- Fragility
- Recorded history and cultural associations
- Connectivity within the landscape

Table 5.1 Assessment of existing SNCIs

Grade I	Grade II	Local	No access
21	17	16	5

 $5.9\,$  Of the  $56\,$  that were surveyed and reviewed,  $70\%\,$  have remained the same grade,  $23\%\,$  increasing in grade and  $7\%\,$  having a reduced grade.

Table 5.2 Assessment of new SNCIs

Grade I	Grade II	Local	No access		
0	6	3	2		

5.10 Of the 9 potential SNCI sites surveyed and evaluated, 67% of the sites were evaluated at being Grade II and 33% were evaluated at Local Grade.

- 5.11 According to the SA (2015), Policy DM28, which seeks to achieve protection and enhancement, should contribute to all three of the following sustainability objectives:
  - Conserve and enhance biodiversity and the quality of the environment, including incorporating features into development such as green roods and an appropriate range of outdoor spaces in developments
  - Increase quality and range of wildlife habitats in the borough
  - Increase tree cover
- 5.12 In particular, Policy DM28 is focussed on protecting and enhancing the boroughs woodlands, trees (particularly preserved trees and trees that make a contribution to the character of the area) and hedgerows. The policy also seeks to improve access to nature by setting out a series of requirements for development proposals, including a requirement to incorporate biodiversity within/on buildings and on development sites. Similar to the above policy, this contributes to the borough's resilience to climate change by mitigating the impact of higher temperatures as a result of climate change.

## 6. Policy DM29: Trees

6.1 This section of the technical paper looks at Policy DM29 of the Croydon Local Plan: Detailed Policies and Proposals (Proposed Submission) and sets out the evidence and methodologies underpinning the proposed policy, and how this relates to the broader policy context.

The Council will seek to protect and enhance the borough's woodlands, trees and hedgerows by:

- a) Ensuring that all development proposals accord with the recommendations of BS5837 2012 (Trees in relation to design, demolition and construction) or equivalent;
- b) Not permitting development that results in the loss or the excessive pruning of preserved trees or retained trees where they make a contribution to the character of the area:
- C) Not permitting development that could result in the future loss or excessive pruning of preserved trees or trees that make a contribution to the character of the area; and
- d) Not permitting development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland, hedgerows and veteran trees; and
- e) Producing a tree strategy outlining how the local authority will manage its tree stock and influence the management of those trees subject to a Tree Preservation Order.

## How the policy works/key evidence

- 6.2 The key evidence that informed Policy DM29 is:
  - London Tree and Woodland Framework (2005)
  - BS5837: Trees in relation to design, demolition and construction Recommendations (2012)
- 6.3 This policy follows the priorities set out in the London Tree and Woodland Framework in seeking to ensure that trees and woodlands are integrated into regeneration inititives from the outset.

- 6.4 The London Tree and Woodland Framework sets out the principles of 'right place, right tree'. This seeks to ensure that new and existing planting is appropriately located and designed, taking account of the environment in which the trees are to be planted.
- 6.5 The LTWF sets out the requirement for boroughs to produce a tree strategy. The tree strategy will consider all of the trees in the borough as a single urban woodland with the management of these trees, and the planting of new trees, being planned around this concept.
- 6.6 BS5837: Trees in relation to design, demolition and construction Recommendations (2012) assists in the decision-making process with regard to existing and proposed trees in the context of design, demolition and construction.
- 6.7 BS5837 (2012) sets out the principles and procedures to be followed to achieve a harmonious and sustainable relationship between trees and structures. The standard outlines the level of arboricultural detail that is required to accompany a planning application.
- 6.8 The requirement to protect ancient woodland, hedgerows and veteran trees is in accordance with the NPPF.
- 6.9 The policy seeks to address issues arising from the introduction of urban planting.
- 6.10 The principles of right place, right tree will lessen the impact of urban planting on dwellings and amenity space. For example, planting suitably sized trees in locations that will not generate unacceptable levels of shade or ensuring that large, specimen trees are not located close to parking spaces (aphids/birds).
- 6.11 Similarly, planting trees at sufficient distances from existing and proposed buildings will reduce the likelihood of direct damage to buildings and, to a degree, the instances of tree related subsidence.
- 6.12 Applying the recommendations of BS5837: Trees in relation to design, demolition and construction (2012) will ensure that hard surfaces are specifically engineered to accommodate the movement of tree roots.

It is accepted that services beneath a footpath are a constraint to urban tree planting. Sites for future planting will be identified in the tree strategy with reference to this constraint.

- 6.13 There is often a perceived threat from mature trees because of their size, movement in the wind or potential to fail. Whilst little can be done to overcome this perception, the principles of right place, right tree and a suitable management plan in a tree strategy can go some way to alleviating this threat.
- 6.14 Similar to the above policies, the policy will contribute to the borough's biodiversity objectives and resilience to climate change by mitigating the impact of higher temperatures.

## Appendix 1: Locations considered as Local Green Spaces in Croydon

								De	monstrably	special							
Site Ref	Site Name	Existing Local Open Land	Ward	Land is in close proximity to the communities it serves	Historic Park or Garden	Community Garden	Children's play area	Tranquil area	Natural or semi- natural open space	Allotment	Cemetery, church yard or burial ground	Site of nature conservation importance	Playing field or recreation ground	Local in character and not an extensive tract of land	Accessible to public	Additional notes	Designate as Local Green Space?
A1	Norbury Park	Yes	Norbury	Yes	Ouracii	Garacii	Yes	urcu	Space	Anothent	ground	Yes	Yes	Yes	Yes	Hotes	Yes
A2	Norbury Park allotments	Yes	Norbury	Yes						Yes				Yes	No	Padlocked	No
A3	Land at Norbury Close	No	Norbury	Yes										Yes	Yes	Incidental space	No
A4	Biggin Wood	Yes	Upper Norwood	Yes				Yes	Yes			Yes	Yes	Yes	Yes	Contains a tennis court. Predominantly a wood.	Yes
A5	Biggin Wood allotments	Yes	Upper Norwood	Yes						Yes				Yes	No	Padlocked	No
A6	Beulah Hill Pond	Yes	Upper Norwood	Yes	Yes			Yes				Yes		Yes	No		Yes
B1	Convent Wood	No	Upper Norwood	Yes	Yes				Yes			Yes		Yes	No	Private school. No public access to site.	Yes
B2	Virgo Fidelis School	No	Upper Norwood	Yes	Yes									Yes	No	Private school. No public access to site.	No
В3	Upper Norwood Recreation Ground	Yes	Upper Norwood	Yes	Yes							Yes	Yes	Yes	Yes		Yes
B4	Westow Park	Yes	South Norwood	Yes			Yes					Yes	Yes	Yes	Yes		Yes
B5	Stambourne Woodland Walk	Yes	South Norwood	Yes				Yes	Yes					Yes	Yes	Not an SNCI for some reason.	Yes
В6	Maberley Road allotments	Yes	South Norwood	Yes						Yes				Yes	No	Run by Bromley Council. Padlocked.	No
В7	Spa Hill allotments	Yes	Upper Norwood	Yes						Yes				Yes	No	Padlocked	No
В8	The Lawns	Yes	Upper Norwood	Yes	Yes		Yes		Yes				Yes	Yes	Yes		Yes
В9	All Saints with St Margaret's Churchyard	Yes	South Norwood	Yes	Yes						Yes			Yes	Yes		Yes
Bi	Land to r/o YMCA, Sylvan Hill	Yes	South Norwood	Yes					Yes			Yes		Yes	No	Small wooded area. Private.	No
C1	Pollards Hill	Yes	Norbury	Yes	Yes								Yes	Yes	Yes		Yes

								Dei	nonstrably	special							
Site Ref	Site Name	Existing Local Open Land	Ward	Land is in close proximity to the communities it serves	Historic Park or Garden	Community Garden	Children's play area	Tranquil area	Natural or semi- natural open space	Allotment	Cemetery, church yard or burial ground	Site of nature conservation importance	Playing field or recreation ground	Local in character and not an extensive tract of land	Accessible to public	Additional notes Extended	Designate as Local Green Space?
C2	Norbury Hall	Yes	Norbury	Yes	Yes							Yes		Yes	Yes	area designated in UDP as Local Open Land is a private sports field.	Yes
C3	Green Lane Sports Ground	Yes	Upper Norwood	Yes			Yes						Yes	Yes	Yes	No formal pitches on site. Day nursery on part of site.	Yes
C4	Northwood Road Recreation Ground (Northwood Playground)	No	Upper Norwood	Yes			Yes							Yes	Yes	No greenery on it at all. Completely covered by hard surface. No photo as children playing on it.	Yes
C5	Thornton Heath Recreation Ground	Yes	Bensham Manor	Yes	Yes	Yes	Yes						Yes	Yes	Yes		Yes
C6	Trimble Gardens	Yes	Bensham Manor	Yes		Yes		Yes						Yes	Yes	Formally laid out gardens.	Yes
D1	Grangewood Park	Yes	Thornton Heath	Yes	Yes		Yes	Yes					Yes	Yes	Yes		Yes
D2	Whitehorse Meadow	Yes	Thornton Heath	Yes					Yes			Yes		Yes	Yes	Former allotment. Now tall grasslands. Bit like South Norwood Country Park.	Yes
D3	Beaulieu Heights	Yes	South Norwood	Yes	Yes				Yes					Yes	Yes		Yes
Di	Selhurst Park	Yes	Selhurst	Yes										No	No	Crystal Palace FC pitch!	No
Dii	Land at Harris Academy South Norwood	Yes	South Norwood	Yes										Yes	No	Private land in school. Can't even see it from road. No access.	No

								Dei	monstrably	special							
Site Ref	Site Name	Existing Local Open Land	Ward	Land is in close proximity to the communities it serves	Historic Park or Garden	Community Garden	Children's play area	Tranquil area	Natural or semi- natural open space	Allotment	Cemetery, church yard or burial ground	Site of nature conservation importance	Playing field or recreation ground	Local in character and not an extensive tract of land	Accessible to public	Additional notes No	Designate as Local Green Space?
E1	Valley Park Children's Playground	Yes	Broad Green	Yes										Yes	Yes	children's playground. Just incidental space. Mown grass not seminatural.	No
E2	Canterbury Road Recreation Ground	Yes	Broad Green	Yes			Yes						Yes	Yes	Yes	Play area, all weather sports pitch and open space.	Yes
Ei	Frant Road (Streatham- Croydon Rugby Club)	Yes	West Thornton	Yes									Yes	Yes	No	Private rugby club	No
F1	Bert Road allotments	Yes	Thornton Heath	Yes						Yes				Yes	No	Allotment - padlocked	No
F10	Little Road Playground	No	Addis- combe	Yes			Yes							Yes	Yes	100% hard surfaced	Yes
F2	Pawson's Road allotments	Yes	Bensham Manor	Yes						Yes				Yes	No	Allotment - padlocked	No
F3	Northbrook Road Playground	Yes	Selhurst	Yes										Yes	Yes	Just grass, nothing else on site. Abandoned	No
F4	Heavers Farm Meadow and allotments	Yes	Selhurst	Yes				Yes	Yes	Yes		Yes		Yes	Yes	Meadow is public, allotment is not. Allotments are different site from meadows.	Yes
F5	Queen's Road Cemetery	Yes	Selhurst	Yes	Yes						Yes			Yes	Yes		Yes
F6	Wilford Road Recreation Ground	Yes	Selhurst	Yes			Yes						Yes	Yes	Yes		Yes
F7	Boulogne Road Playground	Yes	Selhurst	Yes			Yes							Yes	Yes		Yes
F8	Whitehores Road Recreation Ground	Yes	Selhurst	Yes	Yes								Yes	Yes	Yes		Yes

								De	monstrably	/ special							
Site Ref	Site Name	Existing Local Open Land	Ward	Land is in close proximity to the communities it serves	Historic Park or Garden	Community Garden	Children's play area	Tranquil area	Natural or semi- natural open space	Allotment	Cemetery, church yard or burial ground	Site of nature conservation importance	Playing field or recreation ground	Local in character and not an extensive tract of land	Accessible to public	Additional notes	Designate as Local Green Space?
F9	King George's Field Recreation Ground	Yes	Selhurst	Yes			Yes						Yes	Yes	Yes		Yes
Fi	Land adjacent to railway track to r/o Willowwood Crescent	Yes	Selhurst	Yes					Yes			Yes		Yes	No	Railway land. Two fences precent access to site. Padlocked.	No
G1	South Norwood Recreation Ground	Yes	South Norwood	Yes	Yes		Yes						Yes	Yes	Yes		Yes
G2	Apsley Road Playground	No	Woodside	Yes			Yes							Yes	Yes	100% hard surfaced	Yes
G3	Enmore Road allotments	Yes	Woodside	Yes						Yes				Yes	No	Allotment - padlocked	No
G4	Brickfield Meadows	Yes	Woodside	Yes				Yes	Yes			Yes		Yes	Yes		Yes
G5	Woodside Green	Yes	Woodside	Yes	Yes									Yes	Yes		Yes
G6	Ashburton Park	Yes	Ashburton	Yes	Yes		Yes						Yes	Yes	Yes		Yes
GBi	The Bridle Road	Yes	Shirley	Yes					Yes			Yes		No	Yes	On ground impossible to see divide with Green Belt	
GBiii	Land SE of Selsdon	Yes	Heathfield / Selsdon and Ballards	Yes					Yes			Yes		No	Yes	contiguous. Contiguous with Green Belt.	No No
GBiv	Land SE of Selsdon	Yes	Selsdon and Ballards	Yes					Yes			Yes		No	No	Contiguous with Green Belt.	No
GBix	Extension of Bradmore Green	Yes	Coulsdon East	Yes	Yes									No	Yes	Contiguous with Green Belt.	No
GBv	Land SW of Cudham Drive	Yes	New Addington / Heathfield	Yes					Yes			Yes		No	Yes	Contiguous with Green Belt.	No
GBvi	Godstone Road cricket ground	Yes	Kenley	Yes									Yes	No	No	Contiguous with Green Belt.	No
Gbvii 22	Cousldon Railway Embankment	Yes	Coulsdon West	Yes					Yes					No	No	No public access. Contiguous with Green Belt.	No

								Der	nonstrably	special							
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Gbvii i	Land on Riddlesdown Road	Yes	Kenley/ Sander- stead	Yes					Yes			Yes		No	Yes	Contiguous with Green Belt.	No
GBx	Land at Rogers Close	Yes	Coulsdon East	Yes					Yes					No	No	Wooded slope at r/o gardens. Contiguous with Green Belt.	No
GBxi	Land in Tollers Lane	Yes	Coulsdon East	Yes										No	Yes	Slight village green feel about it but incidental space contiguous with Green Belt.	No
GBxii	Land r/o Goodenough Way	Yes	Coulsdon East	Yes					Yes					No	Yes	Wooded area with no discernible divide between Green Belt and this site.	No
GBxv	Land to r/o Highwood Close	Yes	Kenley	Yes										No	No	Private garden. Contiguous with Green Belt.	No
Gi	Addiscombe Railway Park	Yes	Addis- combe	Yes								Yes	Yes	Yes	Yes	20.1.	Yes
H1	Glade Wood	Yes	Ashburton	Yes				Yes	Yes			Yes		Yes	No	No public access - padlocked	Yes
H2	Land at Greenview Avenue	Yes	Ashburton	Yes										Yes	Yes	Incidental space	No
Н3	Aylesford allotments	Yes	Ashburton	Yes						Yes				Yes	No	Allotment - padlocked	No
H4	Orchard Road allotments	Yes	Shirley	Yes						Yes				Yes	No	Can't see if still in use as gate is solid sheet metal. Padlocked.	No
H5	Parkfields Recreation Ground	Yes	Shirley	Yes			Yes					Yes	Yes	Yes	Yes		Yes
Hi	Land at Chaucer Avenue	Yes	Ashburton	Yes										Yes	Yes	Incidental space	No
J1	Waddon Ponds	Yes	Waddon	Yes				Yes				Yes	Yes	Yes	Yes		Yes

								De	monstrably	/ special							
Site Ref	Site Name	Existing Local Open Land	Ward	Land is in close proximity to the communities it serves	Historic Park or Garden	Community Garden	Children's play area	Tranquil area	Natural or semi- natural open space	Allotment	Cemetery, church yard or burial ground	Site of nature conservation importance	Playing field or recreation ground	Local in character and not an extensive tract of land	Accessible to public	Additional notes	Designate as Local Green Space?
J2	Wandle Park	Yes	Broad	Yes	Yes	Carden	Yes	Yes	Yes	Anothient	ground	Yes	Yes	Yes	Yes	notes	·
J3	Duppas Hill	Yes	Green Waddon	Yes	Yes		Yes					Yes	Yes	Yes	Yes		Yes Yes
J4	St John's Church Memorial Garden (north)	Yes	Fairfield	Yes				Yes			Yes			Yes	Yes		Yes
J5	St John's Church Memorial Garden	Yes	Fairfield	Yes	Yes			Yes			Yes			Yes	Yes		Yes
Ji	Extension to Duppas Hill	Yes	Waddon	Yes					Yes					Yes	No	Grassland with no public access	No
Jii	St John's Church Memorial Garden (east)	Yes	Fairfield	Yes				Yes			Yes			Yes	Yes		Yes
Jiii	Land at Layton Crescent	Yes	Waddon	Yes										Yes	Yes	Incidental space	No
K1	Whitgift Almshouses	No	Fairfield	Yes	Yes									Yes	No	Private gardens	No
K2	The Queen's Gardens	Yes	Fairfield	Yes	Yes									Yes	Yes	3	Yes
K3	St Peter's Churchyard	Yes	Fairfield	Yes	Yes			Yes			Yes			Yes	Yes		Yes
K4	Park Hill Recreation Ground	Yes	Fairfield	Yes	Yes	Yes	Yes					Yes	Yes	Yes	Yes		Yes
Ki	College Green	Yes	Fairfield	Yes				Yes						Yes	Yes		Yes
Kii	Bowling Club, Warham Road	Yes	Waddon	Yes									Yes	Yes	No	Private bowling club	No
L1	Addiscombe Recreation Ground	Yes	Ashburton	Yes	Yes		Yes						Yes	Yes	Yes		Yes
L2	Land at Shirley Avenue	Yes	Heathfield	Yes										Yes	Yes	Incidental space	No
L3	Hall Grange	No	Heathfield	Yes	Yes							Yes		Yes	No	Private nursing home	No
L4	St John's Church	Yes	Heathfield	Yes	Yes						Yes			Yes	Yes		Yes
L5	Shirley Recreation Ground	Yes	Heathfield	Yes			Yes						Yes	Yes	Yes		Yes

								Dei	monstrably	/ special							
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Li	Trinity School playing field	Yes	Fairfield	Yes									Yes	Yes	No	Trinity School Playing Field. No public access.	No
Lii	Shirley triangle	Yes	Heathfield	Yes					Yes			Yes		Yes	No	Looks like overgrown leftover land. No public access - padlocked.	No
Liii	Land at Beech Grove	Yes	Croham	Yes									Yes	Yes	No	Private sports club (South Croydon Tennis Club). Open space is part concrete tennis courts.	No
M1	Temple Avenue Copse	Yes	Shirley	Yes					Yes					Yes	Yes	Woodland - quite overgrown. Appears private but gate is open. No Croydon Council sign.	Yes
M2	Millers Pond	Yes	Shirley	Yes	Yes			Yes	Yes					Yes	Yes		Yes
МЗ	Spring Park Wood	Yes	Shirley	Yes				Yes	Yes			Yes		Yes	Yes		Yes
GBxiii	Land south of Croham Hurst	Yes	Selsdon and Ballards	Yes									Yes	No	No	Tennis court (private). Contiguous with Croham Hurst (Green Belt).	No

								Der	nonstrably	/ special							
Site Ref	Site Name	Existing Local Open Land	Ward	Land is in close proximity to the communities it serves	Historic Park or Garden	Community Garden	Children's play area	Tranquil area	Natural or semi- natural open space	Allotment	Cemetery, church yard or burial ground	Site of nature conservation importance	Playing field or recreation ground	Local in character and not an extensive tract of land	Accessible to public	notes	Designate as Local Green Space?
GBxiv	Land off Lower Barn Road	Yes	Sander- stead	Yes									Yes	No	No	Riddlesdow n Tennis Club. Contiguous with Purley Oaks behind - should be MOL/Green Belt.	No
N1	Allders Way Playground	No	Waddon	Yes			Yes							Yes	Yes	No photo - too many children playing.	Yes
N2	Haling Grove	Yes	Croham	Yes	Yes	Yes	Yes					Yes	Yes	Yes	Yes		Yes
N3	South Croydon Recreation Ground	Yes	Croham	Yes			Yes						Yes	Yes	Yes		Yes
N4	South Croydon allotments	Yes	Croham	Yes						Yes				Yes	No	Padlocked	No
N5	Normanton Meadows	Yes	Croham	Yes				Yes						Yes	Yes	Grass field	Yes
Ni	Purley Oaks pond	Yes	Purley	Yes										Yes	No	Balancing pond. No access. Contaminat ed water.	No
Nii	Croham Road Sports Ground	Yes	Croham	Yes									Yes	Yes	No	Whitgift Sports Club - private	No
P1	Thomas Moore School Frontage	No	Purley	Yes	Yes									Yes	No	Part of school. No public access.	No
P2	Rotary Field	Yes	Purley	Yes			Yes						Yes	Yes	Yes		Yes
P3	Woodcote Village Green	Yes	Purley	Yes	Yes									Yes	Yes		Yes
P4	Promenade du Verdun	No	Purley	Yes	Yes									Yes	Yes	A road with grass verge on one side. Tree lined avenue.	Yes
P5	Copse Hill Spinney	Yes	Coulsdon West	Yes				Yes	Yes			Yes		Yes	No	Copse Hill Bird Sanctuary - no public access but appears to be owned by Council.	Yes

								De	monstrably	y special							
Site Ref	Site Name	Existing Local Open Land	Ward	Land is in close proximity to the communities it serves	Historic Park or Garden	Community Garden	Children's play area	Tranquil area	Natural or semi- natural open space	Allotment	Cemetery, church yard or burial ground	Site of nature conservation importance	Playing field or recreation ground	Local in character and not an extensive tract of land	Accessible to public	Additional notes	Designate as Local Green Space?
Pi	Land in Woodcote Valley Road	Yes	Coulsdon West	Yes							Ü		Yes	Yes	No	St David's School (private) Playing Fields - no public access.	No
Q1	Wettern Green Garden	Yes	Sander- stead	Yes	Yes	Yes		Yes						Yes	Yes	533355	Yes
Q2	Purley Beeches	Yes	Sander- stead	Yes				Yes	Yes			Yes	Yes	Yes	Yes	Contains tennis courts	Yes
Q3	Sanderstead allotments	Yes	Sander- stead	Yes						Yes				Yes	No	Looks like it could be padlocked although open when I visited.	No
Q4	Sanderstead Recreation Ground	Yes	Sander- stead	Yes			Yes						Yes	No	Yes	Contiguous with Green Belt.	No
Q5	All Saints Churchyard, Sanderstead	No	Sander- stead	Yes	Yes						Yes			Yes	Yes		Yes
Q6	Sanderstead Pond (and Green)	Yes	Sander- stead	Yes	Yes				Yes					Yes	Yes		Yes
Qi	Land in Brancaster Lane	Yes	Purley	Yes									Yes	Yes	No	Tennis club and bowling green	No
Qii	Land in Penworthan Road	Yes	Purley	Yes									Yes	Yes	No	Sander stead Lawn Tennis and Social Club	No
Qiii	All Saints Graveyard, Sanderstead	Yes	Sander- stead	Yes							Yes			Yes	Yes		Yes
Qiv	Gresham Primary School field	Yes	Sander- stead	Yes										No	No	Private - no public access. Contiguous with Green Belt via Sanderstead Recreation Ground (site Q4)	No
Qv	Land r/o Lime Meadow Avenue	Yes	Sander- stead	Yes									Yes	Yes	No	Sander- stead Village Tennis Club	No

								Dei	nonstrably	/ special							
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Qvi	Land south of Sanderstead allotments	Yes	Sander- stead	Yes					Yes					Yes	No	Extension to Sander- stead allotments. Unable to access directly but appears to be a wooded area with no public access.	No
R1	The Ruffet	Yes	Selsdon and Ballards	Yes					Yes			Yes		Yes	Yes		Yes
R2	Selsdon Recreation Ground	Yes	Selsdon and Ballards	Yes			Yes						Yes	Yes	Yes		Yes
R3	Land at Copse View	Yes	Heathfield	Yes										Yes	Yes	Incidental space	No
R4	John Ruskin Playing Field	No	Heathfield	Yes										Yes	No	Space in John Ruskin College - not even a playing field. Private with no public access.	No
R5	Courtwood Playground	Yes	Heathfield	Yes			Yes							No	Yes	Contiguous with Green Belt.	No
Ri	Land in Broadcombe	Yes	Heathfield	Yes										Yes	Yes	Incidental space	No
Rii	Ashen Grove	Yes	Heathfield / Selsdon and Ballards	Yes					Yes					Yes	Yes	ориос	Yes
Riii	Land at The Green	Yes	Heathfield	Yes										Yes	Yes	Incidental space	No
S1	Land fronting 61-91 North Downs Road	Yes	New Addington	Yes										Yes	Yes	Incidental space	No
S2	Land fronting 89-119 King Henry's Drive	Yes	Fieldway	Yes										Yes	Yes	Incidental space	No

								Dei	nonstrably	/ special							
Site Ref	Site Name	Existing Local Open Land	Ward	Land is in close proximity to the communities it serves	Historic Park or Garden	Community Garden	Children's play area	Tranquil area	Natural or semi- natural open space	Allotment	Cemetery, church yard or burial ground	Site of nature conservation importance	Playing field or recreation ground	Local in character and not an extensive tract of land	Accessible to public	notes	Designate as Local Green Space?
S3	Addington Vale	Yes	New Addington	Yes			Yes							No	Yes	Doesn't feel like contiguous with Green Belt although only because road embank- ment impedes view.	No
Si	Land at Castle Hill Avenue	Yes	Fieldway	Yes			Yes							Yes	Yes	Does have children's play area in it although largely incidental open space.	Yes
Sii	Timebridge Centre	Yes	Fieldway	Yes									Yes	No	Yes	Contiguous with Green Belt.	No
T1	Milne Park	Yes	New Addington	Yes			Yes						Yes	No	Yes	Feels local in character but contiguous with Green Belt via Addington Vale (site S3).	No
T2	Comport Green	Yes	New Addington	Yes										No	Yes	Incidental space	No
Ti	Land on King Henry's Drive	Yes	New Addington	Yes										Yes	Yes	Incidental space	No
U1	Hartley Down allotments	Yes	Kenley	Yes						Yes				Yes	No	Padlocked	No
U2	Foxley Wood and Sherwood Oaks	Yes	Kenley	Yes				Yes	Yes			Yes		Yes	Yes		Yes
U3	Roke Playspace	No	Purley	Yes			Yes							Yes	Yes	Not much on it but there is some play equipment	Yes
U4	Higher Drive Recreation Ground	Yes	Kenley	Yes			Yes	Yes					Yes	Yes	Yes		Yes
Ui	Stoats Nest Village	Yes	Coulsdon East	Yes										Yes	Yes	Incidental space	No

		Existing		Land is in					Nick					1 1			
Site Ref	Site Name	Local Open Land	Ward	close proximity to the communities it serves	Historic Park or Garden	Community Garden	Children's play area	Tranquil area	Natural or semi- natural open space	Allotment	Cemetery, church yard or burial ground	Site of nature conservation importance	Playing field or recreation ground	Local in character and not an extensive tract of land	Accessible to public	Additional notes	Designate as Local Green Space?
Uii	Pavilion on Old Lodge Lane	Yes	Kenley	Yes									Yes	Yes	No	Reedham Park Tennis Club	No
	Smitham allotments	Yes	Coulsdon West	Yes						Yes				Yes	No	Padlocked	No
	Land to r/o Hilliers Heath Road	Yes	Coulsdon East	Yes								Yes		Yes	Yes	Part incidental open space. Part Site of Nature Conser- vation Importance.	Yes
V3	Chaldon Way Gardens	No	Coulsdon East	Yes	Yes	Yes								Yes	Yes		Yes
V4	Coulsdon Memorial Ground	Yes	Coulsdon East	Yes	Yes		Yes						Yes	Yes	Yes		Yes
V5 S	Scrub Shaw	Yes	Coulsdon East	Yes					Yes			Yes		Yes	Yes		Yes
V6	Coulsdon Coppice (North)	Yes	Coulsdon East	Yes					Yes			Yes		Yes	Yes		Yes
V7	Coulsdon Coppice (Stonefield Shaw)	Yes	Coulsdon East	Yes					Yes			Yes		Yes	Yes		Yes
\ \( \( \)	Coulsdon Coppice (Bleakfield Shaw)	Yes	Coulsdon East	Yes					Yes			Yes		Yes	Yes		Yes
VV 1	Former Godstone Road allotments	Yes	Kenley	Yes					Yes					Yes	Yes	Disused allotments	Yes
	Bourne Park	Yes	Kenley	Yes			Yes						Yes	Yes	Yes		Yes
X I	Bradmore Green	Yes	Coulsdon East	Yes	Yes							Yes		No	Yes	Contiguous with Green Belt.	No
X2 E	St John the Evangelist's churchyard	No	Coulsdon East	Yes	Yes									No	Yes	Contiguous with Green Belt.	No
	Noodland r/o The Glade	Yes	Coulsdon East	Yes					Yes					Yes	No	No access to site	No
Yi	Land in Tollers Lane	Yes	Coulsdon East	Yes										Yes	Yes	Incidental space	No
Gii	Dartnell Road Recreation Ground Whitgift Pond	No No	Addis- combe Fairfield	Yes Yes				Yes Yes	Yes			Yes	Yes	Yes Yes	Yes No	Padlocked	Yes Yes

								Do		, anasial							
Site Ref	Site Name	Existing Local Open Land	Ward	Land is in close proximity to the communities it serves	Historic Park or Garden	Community Garden	Children's play area	Tranquil area	monstrably Natural or semi- natural open space	Allotment	Cemetery, church yard or burial ground	Site of nature conservation importance	Playing field or recreation ground	Local in character and not an extensive tract of land	Accessible to public	Additional notes	Designate as Local Green Space?
	Lower Barn	No	Sander-	Yes													
Qvii	Road	_	stead					Yes						Yes	Yes		Yes
	Peabody Close playing field, adjacent allotments and Shirley Oak community	No		Yes													
Lv	garden		Ashburton										Yes	Yes	Yes		Yes
Lvi	Shirley Oaks playing field and wood	No	Shirley	Yes				Yes	Yes				Yes	Yes	Yes		Yes
	Sanderstead	No	Sander-	Yes													
	Plantation		stead					Yes	Yes			Yes		Yes	Yes		Yes
	Norbury Manor Primary school	No		Yes													
	playing fields		Norbury										Yes	Yes	No		No
	Pollards Hill triangle	No	Norbury	Yes				Yes						Yes	Yes		Yes
	St James' Church	Yes		Yes		Yes					Yes			Yes	Yes		Yes
	Semley																
	Road	No	Norbury	Yes										Yes	Yes		No
	St Helen's Green	No		Yes										Yes	Yes		No
	St Philip's	. 10		. 55										. 55	. 55		
	Church															Overgrown	
	Grounds	No		Yes				Yes			Yes			Yes	No	yard	No
	Briar Road Green	No	Norbury	Yes				Yes						Yes	Yes	Incidental space	No
	Green opposite Hamsey Green Pond	No		Yes										Yes	Yes	Incidental space	No
GBv	St Edmund's Church Green	No	Sander- stead	Yes										No	Yes	Contiguous with Green Belt.	No
	Rear of Honeysuckle															Doit.	
	Gardens	No	Ashburton	Yes				Yes						Yes	Yes		Yes