

Proposed urban extensions on Green Belt land – site selection analysis

November 2019

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The Croydon Local Plan review (Issues and Options) consultation sets out three possible urban extensions on Green Belt land under Strategic Option 3, as one way to meet Croydon's housing need up to 2039. This piece of accompanying evidence sets out why the three sites were selected. The evidence is set out as follows:

- Section 1 sets out national planning policy on release of Green Belt land for residential development;
- Section 2 sets out why most areas of Croydon's Green Belt were not considered suitable for development;
- Section 3 consists of a review of all possible urban extensions against the criteria for designation as Green Belt as set out in the National Planning Policy Framework carried out by independent consultants; and
- Section 4 consists of a review by the council of all possible urban extensions against a set of sustainability criteria.

1. National planning policy on release of Green Belt for residential development

Green Belt is a designation that prevents urban sprawl and focuses development on previously developed sites within urban areas. It does this by providing a notional barrier encircling London where within the barrier development is heavily restricted. Specifically its five purposes as set out in the National Planning Policy Framework¹ are:

- To 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.

National planning policy is clear that once Green Belt has been designated, its boundaries should only be changed through Local Plans. Even then 'exceptional circumstances' have to exist (and be evidenced) that there is a need to amend Green Belt². There are three key tests³ that need to be met before Green Belt can be formally de-designated and allocated for development. In order to retain any of the urban extensions in the Local Plan review after the Issues and Options consultation, Croydon Council will need to demonstrate how it has met the three tests. The three tests are that the Local Plan review must:

- Make as much use as possible of suitable brownfield sites and underutilised land (potentially including the redevelopment of existing houses);
- Optimise the density of development, including having policies that promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and
- Be informed by discussions with neighbouring councils about whether they could accommodate some of Croydon's identified need for housing and development.

These tests will need to be met for any part of Strategic Option 3 to be included as part of the draft Local Plan review (to be published in autumn 2020). This means that it would have to be demonstrated that neither Strategic Option 1 nor Strategic Option 2 (or a combination of the two) are either deliverable or sustainable (because they conflict with other parts of the Plan such as tackling the climate emergency). In addition the council would need to establish that none of our neighbouring boroughs and districts in London and Surrey could meet our unmet housing need.

¹ Paragraph 135

² Paragraph 136 of the National Planning Policy Framework

³ Paragraph 137 of the National Planning Policy Framework

Finally, if the above tests have been met then national planning policy says⁴ that first consideration should be given to land which has been previously-developed and/or is well-served by public transport. Local Plans should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.

⁴ Paragraph 138 of the National Planning Policy Framework

2. Why most areas of Croydon's Green Belt are unsuitable for development

Green Belt is not a designation that signifies that land has a particular significance or purpose. It is primarily a tool to focus development in existing urban areas. However, much of Croydon's Green Belt is protected for other reasons, all of which make many areas unsuitable for development. These include being:

- A Site of Special Scientific Interest;
- A National Nature Reserve;
- A Site of Nature Conservation Importance;
- A nationally registered Historic Park and Garden;
- A locally listed Historic Park and Garden;
- A Regionally Important Geological and Geomorphological Site;
- A sports facility that would be difficult to replace;
- A school playing field (that would be difficult to replace);
- A wood;
- An allotment;
- The site being within a Conservation Area and its development would impact upon the Conservation Area as a whole; and
- Nothing important about the site itself but it is separated from the rest of Croydon by a site that is important.

Together the criteria above cover 1,803ha, or 82% of the borough's Green Belt.

3. Review of all possible urban extensions against the criteria for designation as Green Belt

The Green Belt review was carried out by Woods Associates on behalf of Croydon Council. It consisted of two parts. The first part considered Croydon's Green Belt against the national tests for the function of Green Belt. A second part considered the harm to Green Belt were a number of specific sites be removed from Green Belt and developed. The full review is available at www.croydon.gov.uk/localplanreview.

The review categorised sites against the five national tests on the function of Green Belt and rated them as either making a:

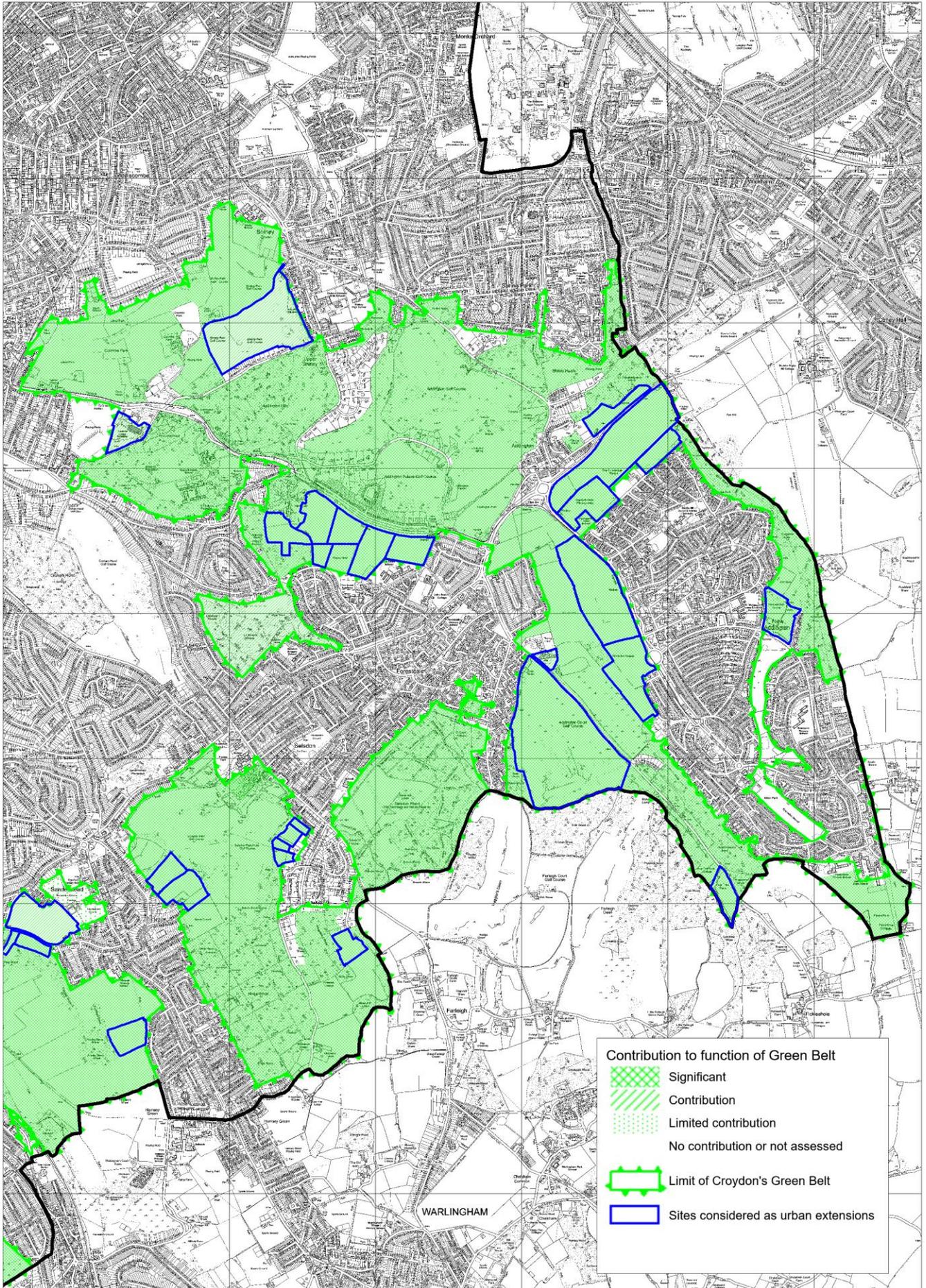
- Significant contribution to Green Belt;
- Contribution to Green Belt;
- Limited contribution to Green Belt; or
- No contribution to Green Belt.

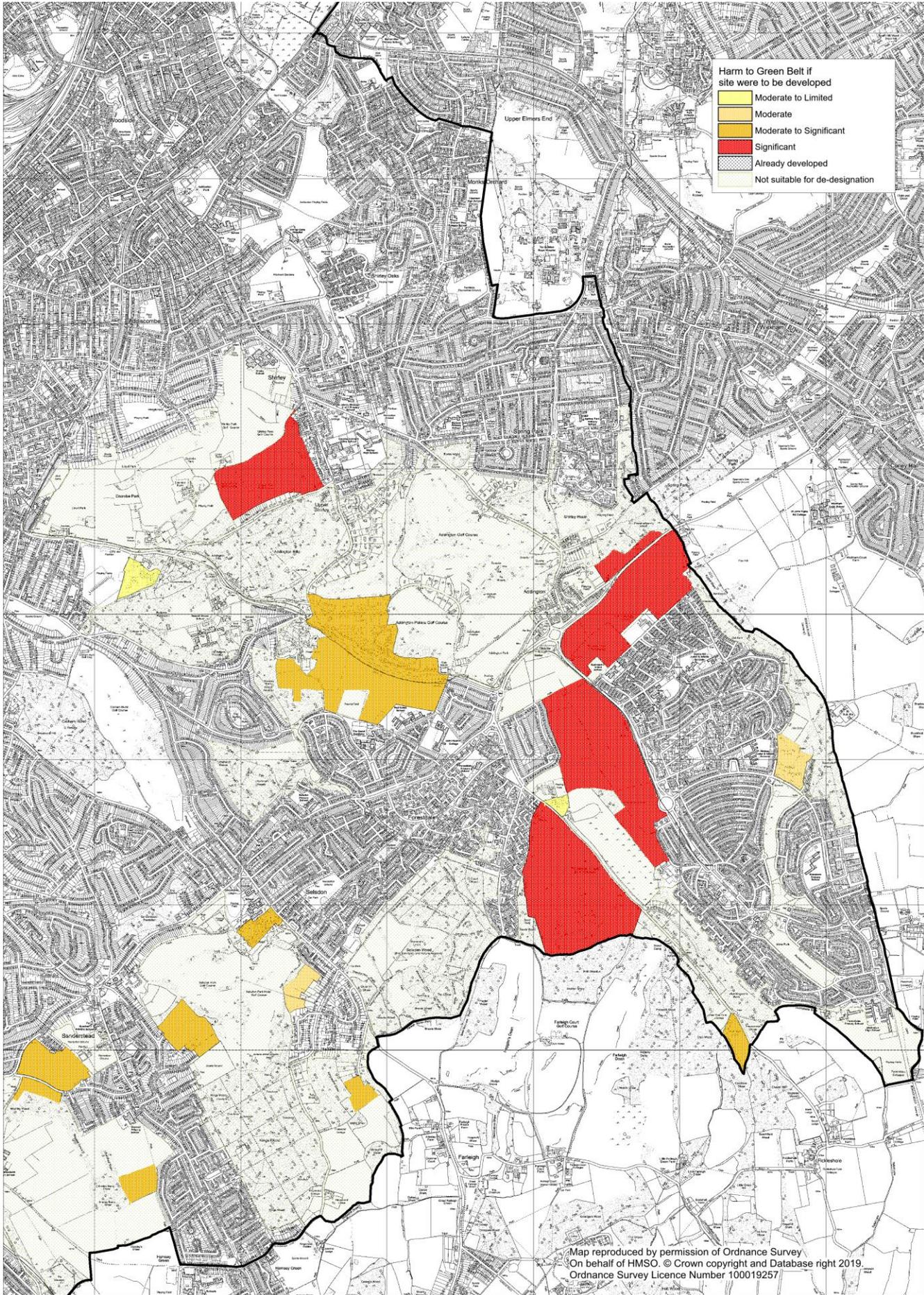
The second part of the review considered the harm to Green Belt were a site to be developed. Not all sites were considered as part of this assessment. Any site covered by one of the categories listed in section 2 above were not included. Those sites that were assessed were rated as either:

- Significant harm to Green Belt if developed;
- Moderate to significant harm to Green Belt if developed;
- Moderate harm to Green Belt if developed; or
- Moderate to limited harm to Green Belt if developed.

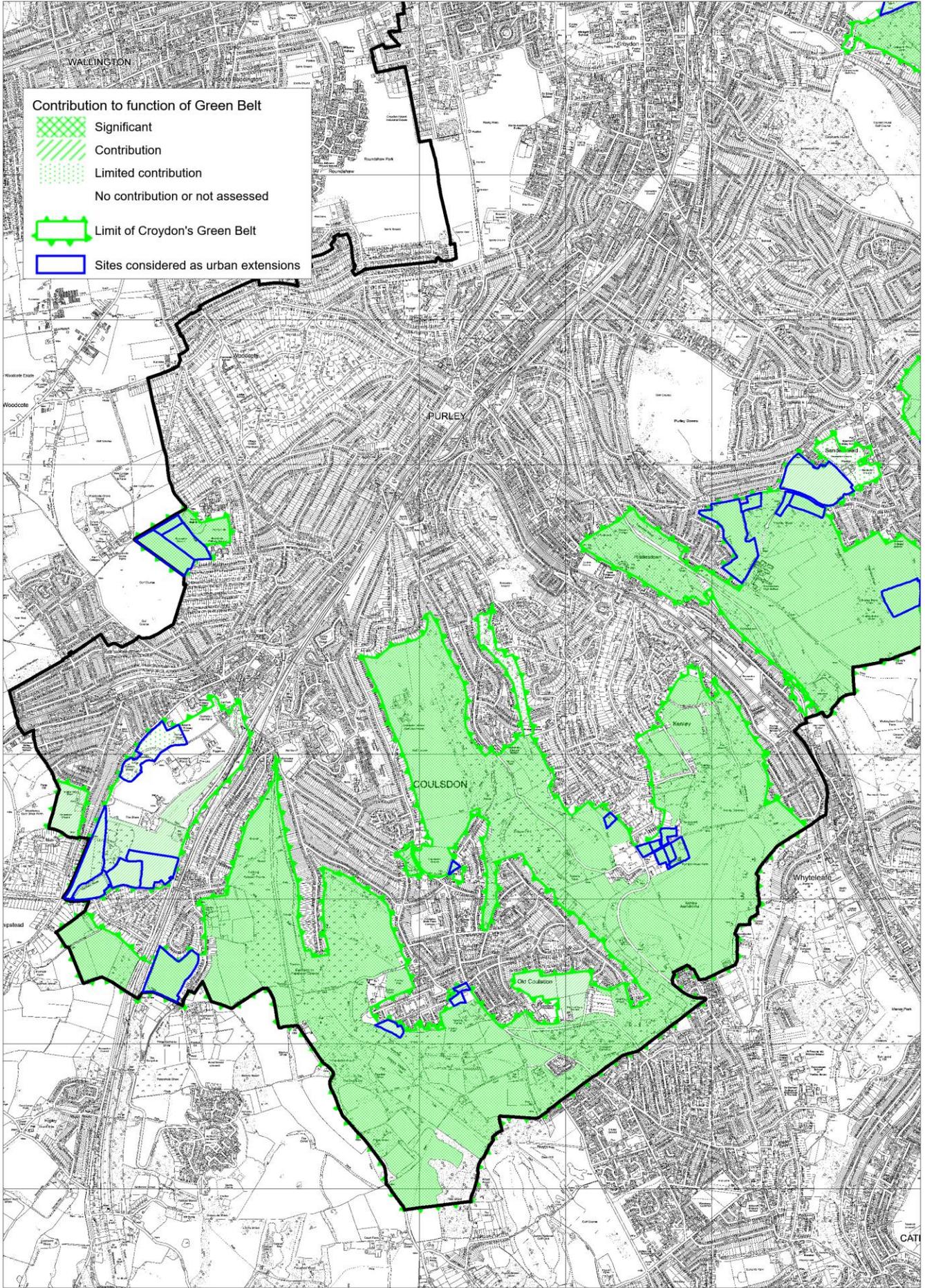
Note all sites considered would create some harm to Green Belt were they developed

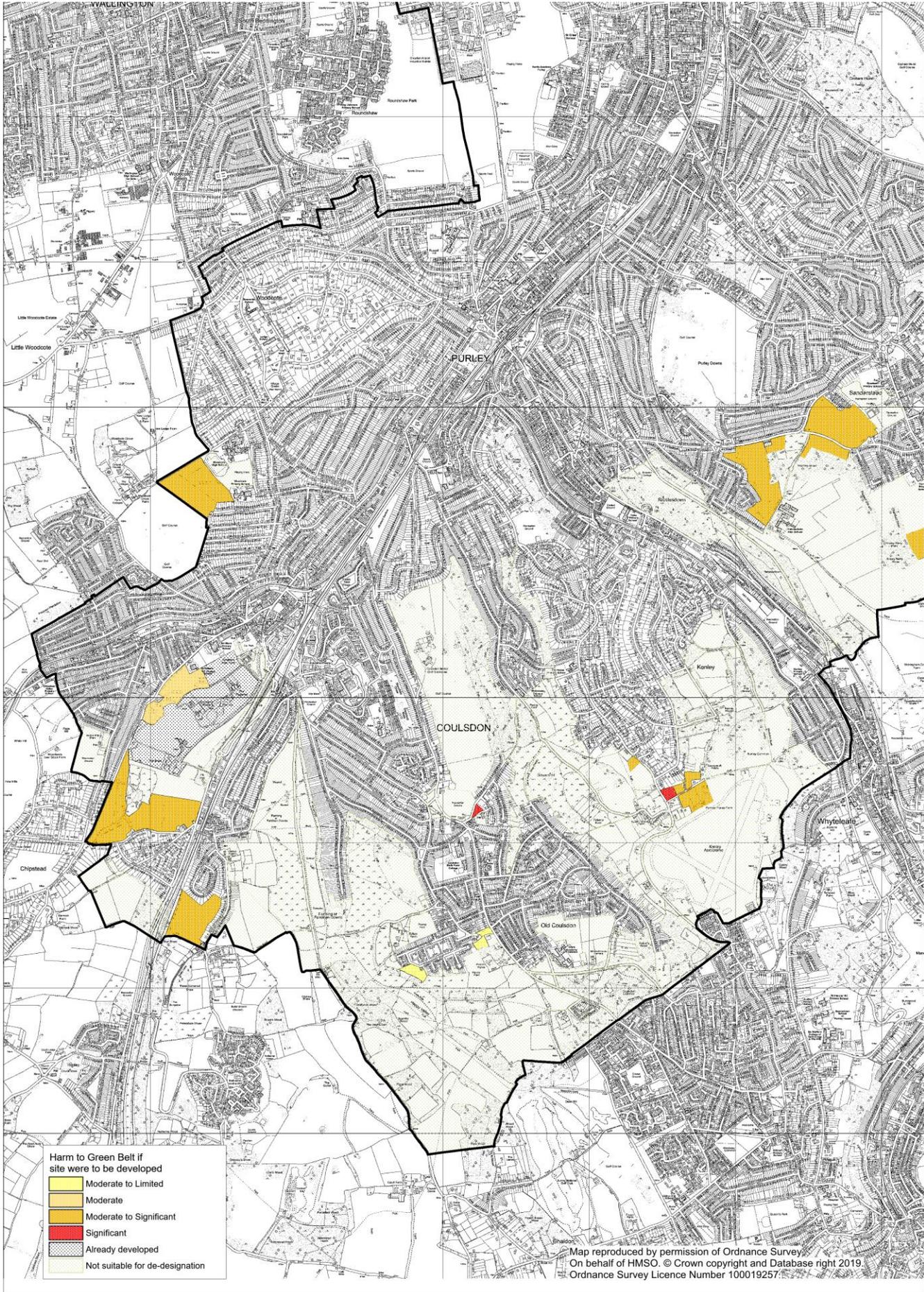
The maps on the following four pages summarise the findings of the Green Belt review.





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4. Review of all possible urban extensions against the sustainability criteria

National planning policy says that in considering urban extensions that priority should be given to previously-developed land or land which is well served by public transport.

There is very little previously developed land in Croydon's Green Belt. The most significant areas being Addington Village (which is a Conservation Area and an existing residential area), Bishops Walk (which is also an existing residential area) and the new Cane Hill development in Coulsdon. Therefore, this review has focussed on land that is well served by public transport.

In total 52 sites were assessed against the following criteria:

- The Public Transport Accessibility Level (PTAL) rating of the site (with 0 meaning no public transport and 6b meaning extremely frequent public transport);
- Is the site within five minutes walk of a bus stop;
- Is the site within ten minutes walk of either a train station or a tram stop;
- Journey time to either East or West Croydon stations using public transport (including walking) at 8am on a weekday;
- Journey time to either London Bridge or London Victoria stations using public transport (including walking) at 8am on a weekday;
- Walking time to the nearest convenience store;
- Walking time to the nearest primary school;
- Journey time to the nearest secondary school using public transport (including walking) at 8am on a weekday;
- Journey time to the nearest GP using public transport; and
- Journey time to the nearest pharmacy using public transport.

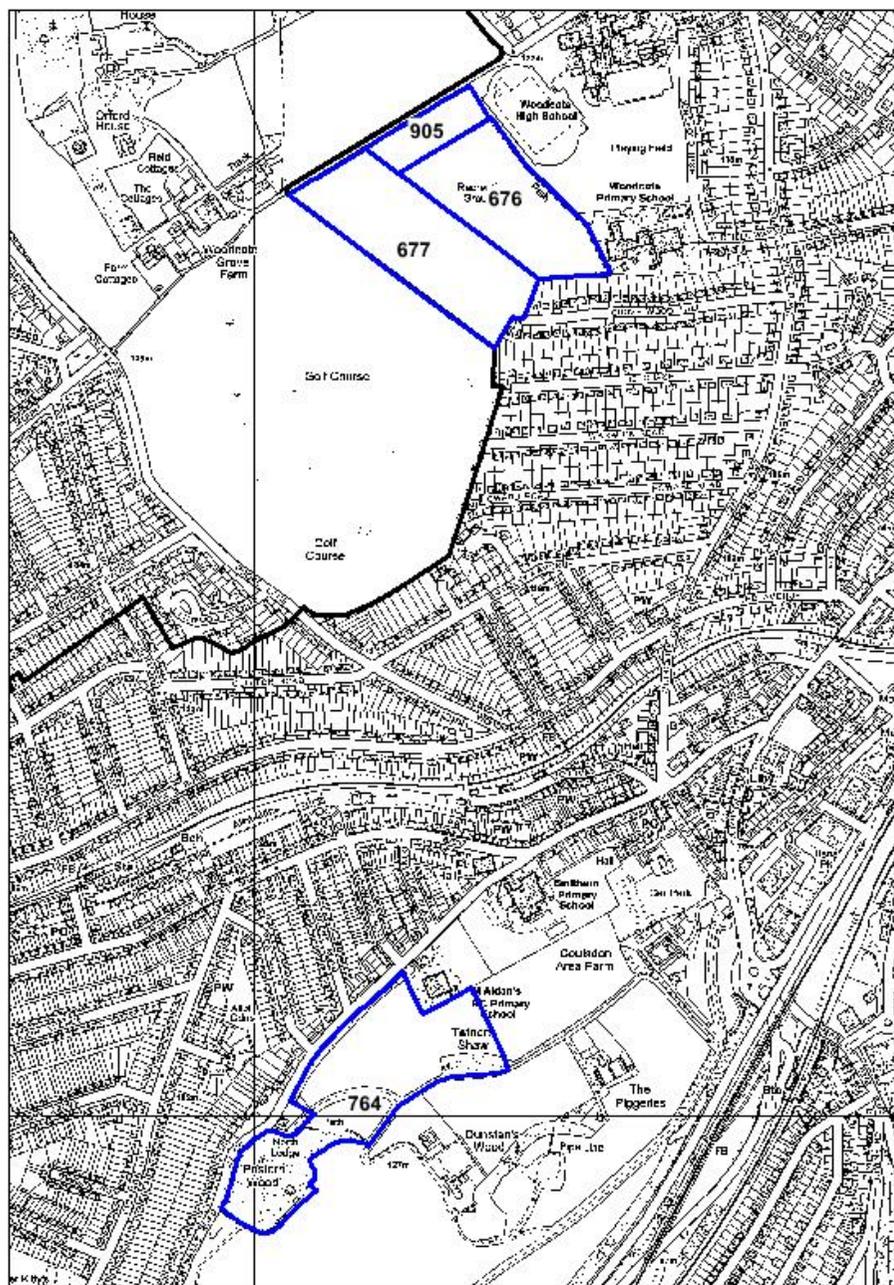
All journey times were taken using the journey planner in Google maps. At this stage no assessment has been made of the capacity of local schools and GP surgeries to accommodate pupils and patients from large development nearby. The measure was included to assess the ability to potentially access essential services using public transport.

Journey and walking times were then further classified into one of the following categories:

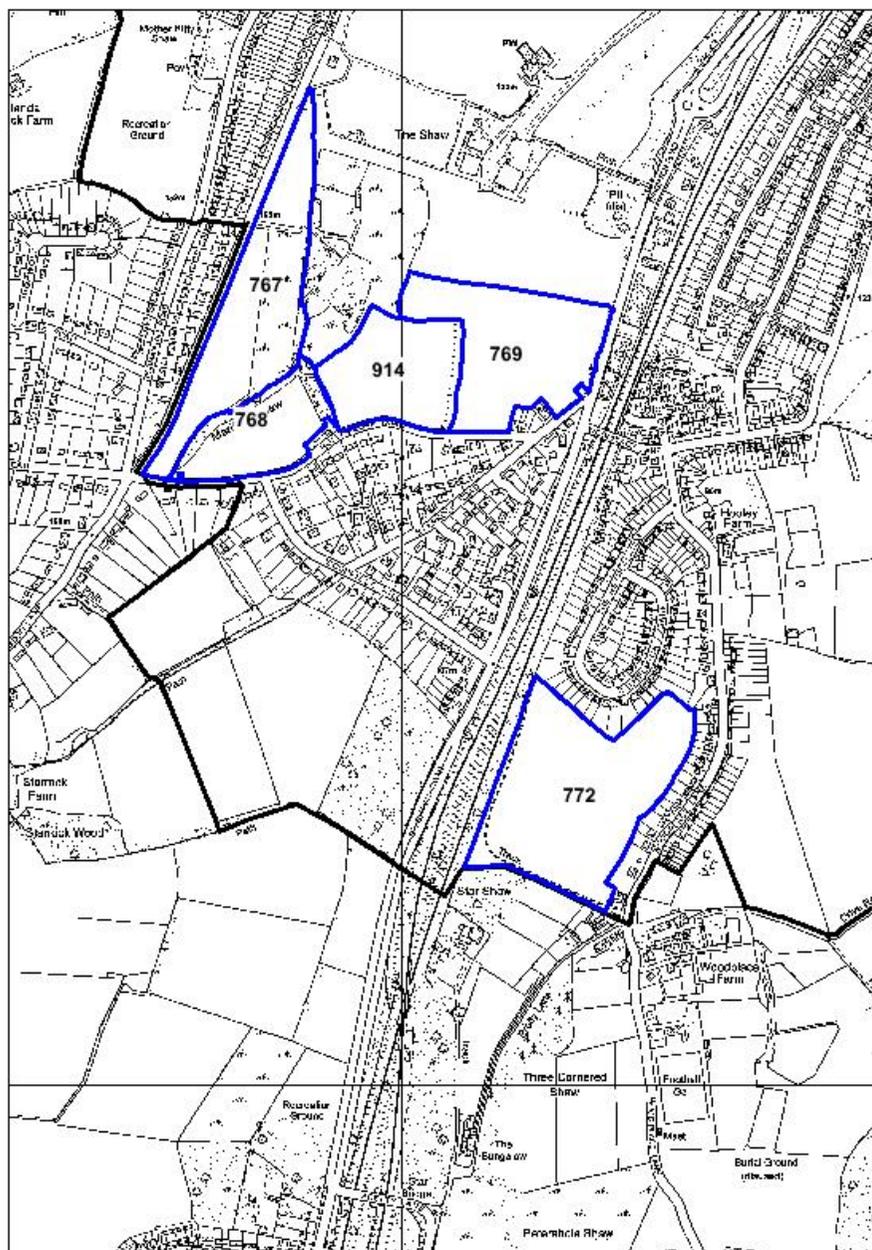
- Best in borough (no other site assessed had a shorter journey time);
- Top 10% (the site was ranked either 2nd, 3rd, 4th or 5th in the borough for journey time);
- Top 25% (the site was ranked between 6th and 13th in the borough for journey time);
- Above average (the site was ranked between 14th and 26th);
- Below average (the site was ranked between 26th and 39th);
- Bottom 25% (the site was ranked between 39th and 46th);

- Bottom 10% (the site was ranked between 47th and 51st for this category); and
- Worst in borough (no other site assessed had a longer journey time).

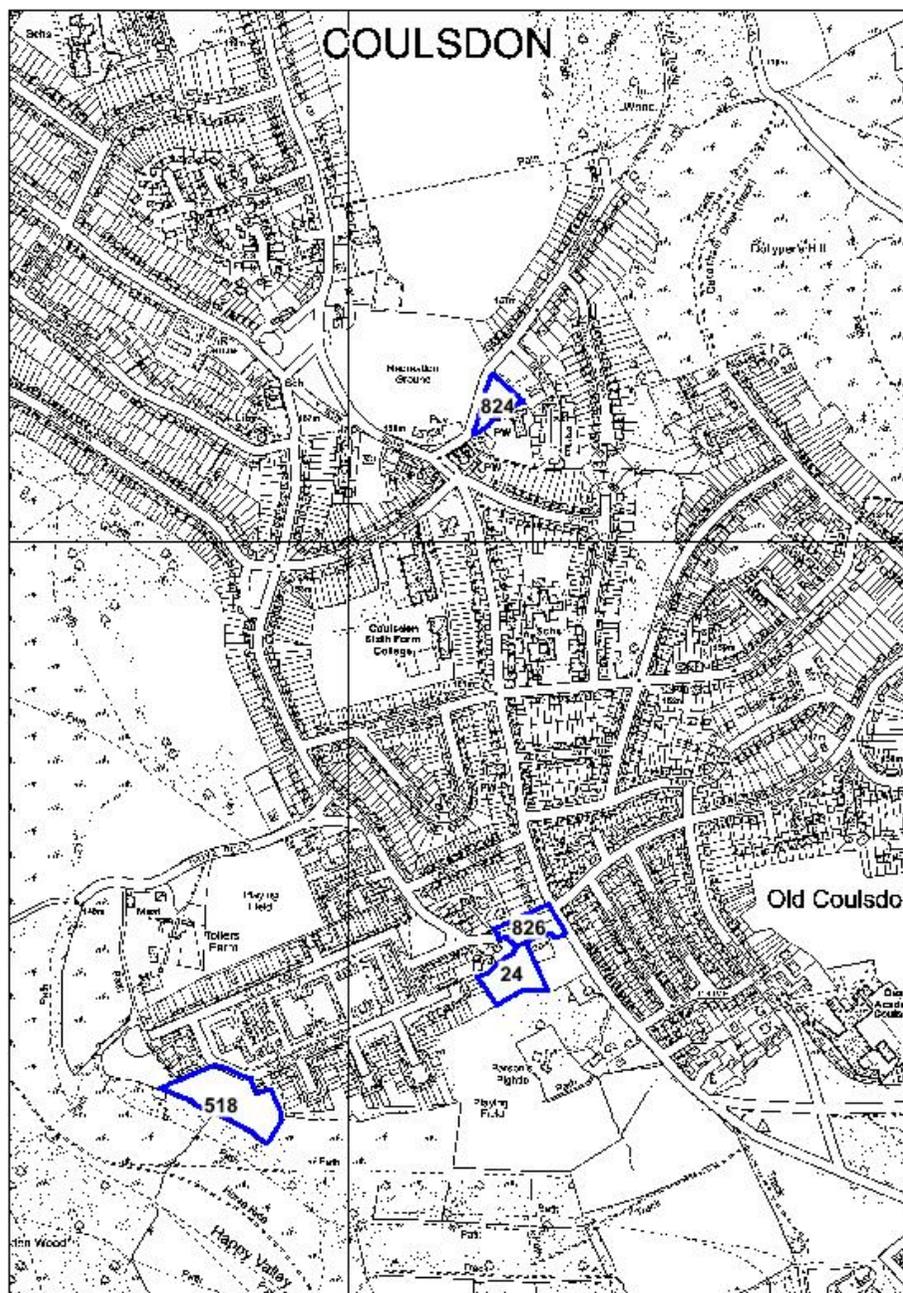
The findings of the assessment can be found on the following pages.



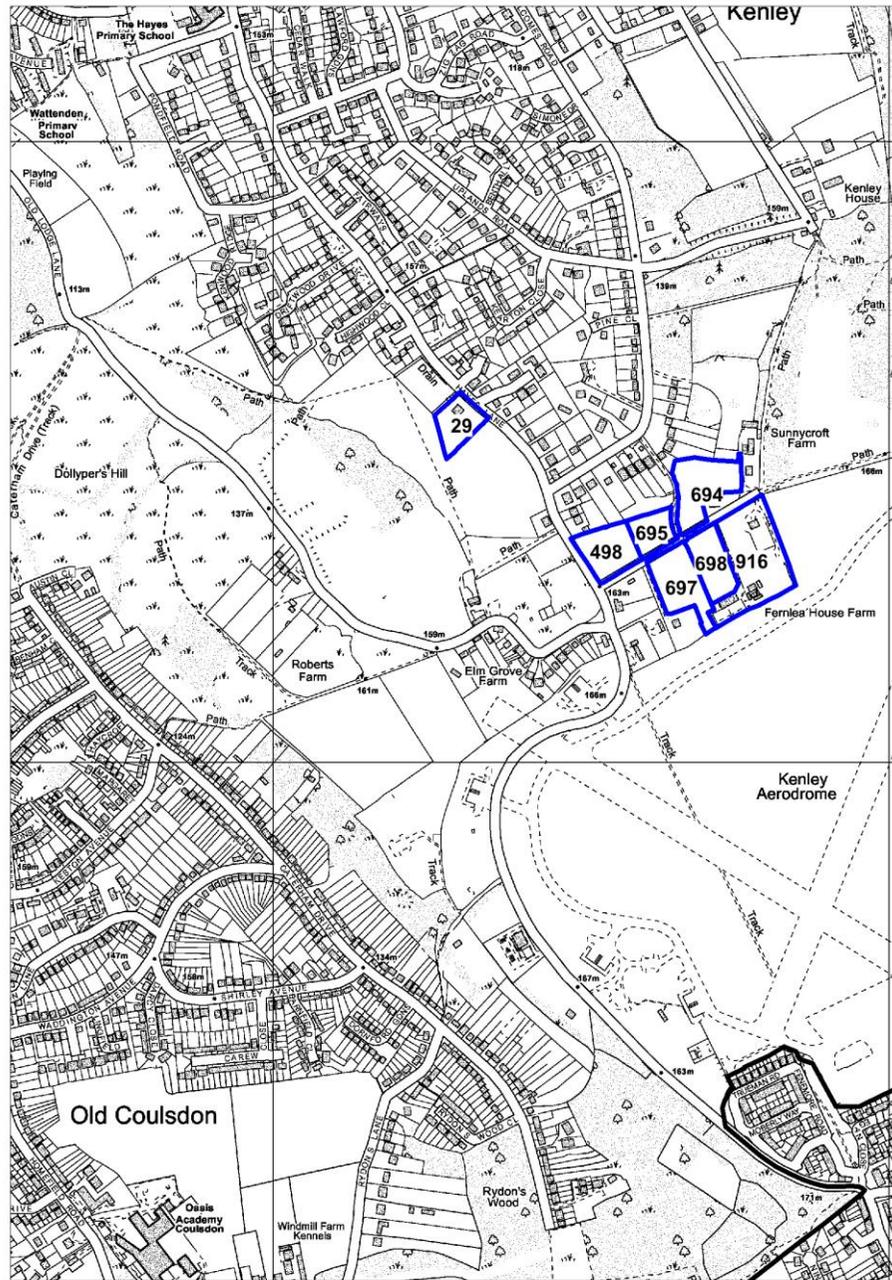
	Site 676	Site 677	Site 764	Site 905
No. of homes	111 to 230	145 to 250	239 to 646	20 to 30
PTAL range	0 to 1a	0 to 1a	0 to 2	0 to 1a
Bus stop <5 mins walk	Yes	Yes	Yes	No
Train/tram <10 mins	No	No	Yes	No
East/West Croydon	Below average	Below average	Top 25%	Bottom 25%
Central London	Above average	Below average	Top 10%	Below average
Convenience shop (walk)	Below average	Below average	Above average	Above average
Primary school (walk)	Top 25%	Top 25%	Best in borough	Above average
Secondary school	Top 25%	Top 25%	Below average	Top 25%
GP	Below average	Below average	Top 25%	Below average
Pharmacy	Below average	Below average	Top 10%	Below average



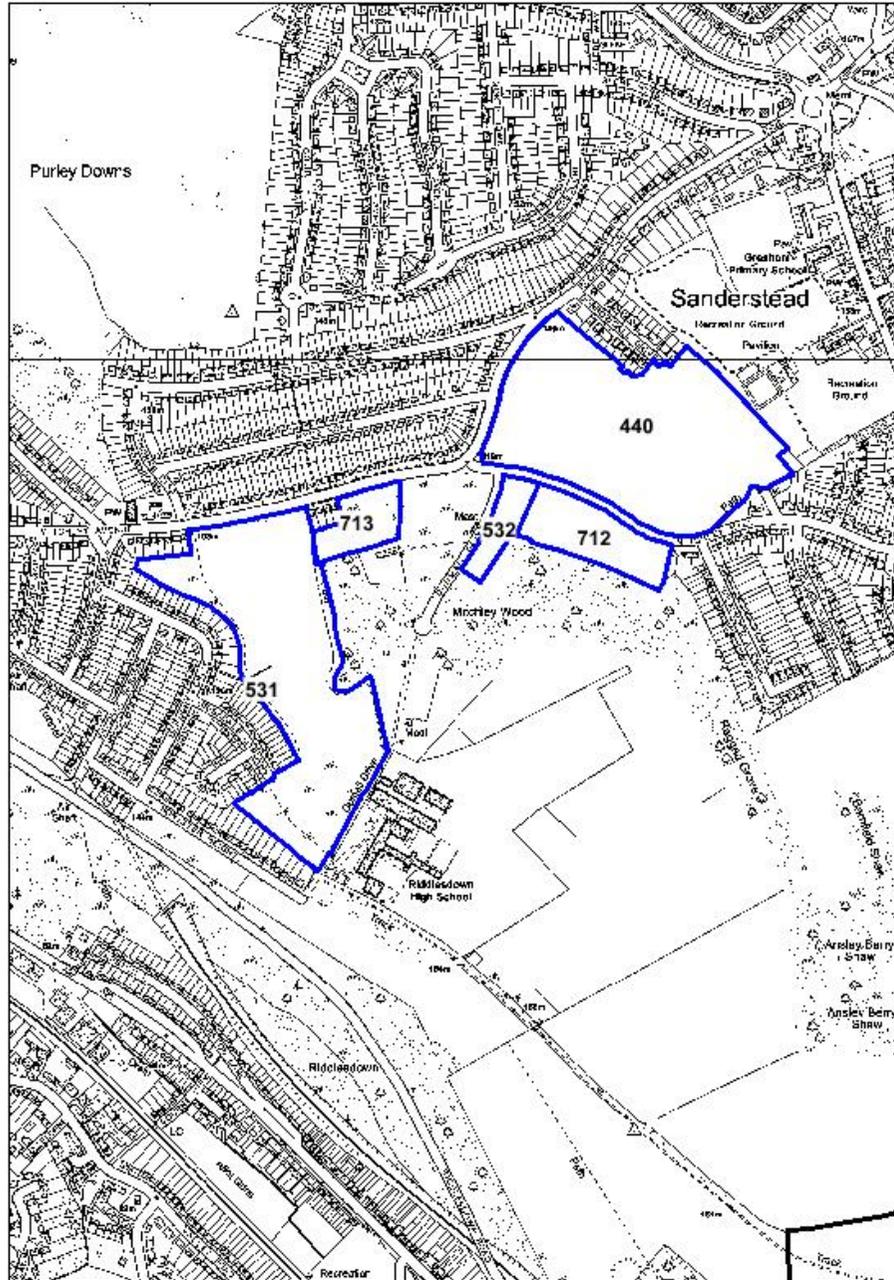
	Site 767	Site 768	Site 769	Site 772	Site 914
No. of homes	85 to 170	41 to 82	76 to 151	279 to 556	52 to 105
PTAL range	0 to 1a	0 to 1a	1a to 1b	0	1a
Bus stop <5 mins walk	Yes	No	Yes	No	Yes
Train/tram <10 mins	No	No	No	No	No
East/West Croydon	Below average	Above average	Above average	Below average	Above average
Central London	Below average	Top 25%	Top 10%	Top 25%	Above average
Convenience shop (walk)	Below average	Bottom 25%	Bottom 25%	Bottom 10%	Bottom 10%
Primary school (walk)	Above average	Bottom 25%	Bottom 10%	Bottom 10%	Bottom 10%
Secondary school	Below average	Bottom 25%	Bottom 25%	Bottom 25%	Bottom 25%
GP	Above average	Below average	Above average	Bottom 25%	Below average
Pharmacy	Below average	Below average	Top 25%	Bottom 25%	Above average



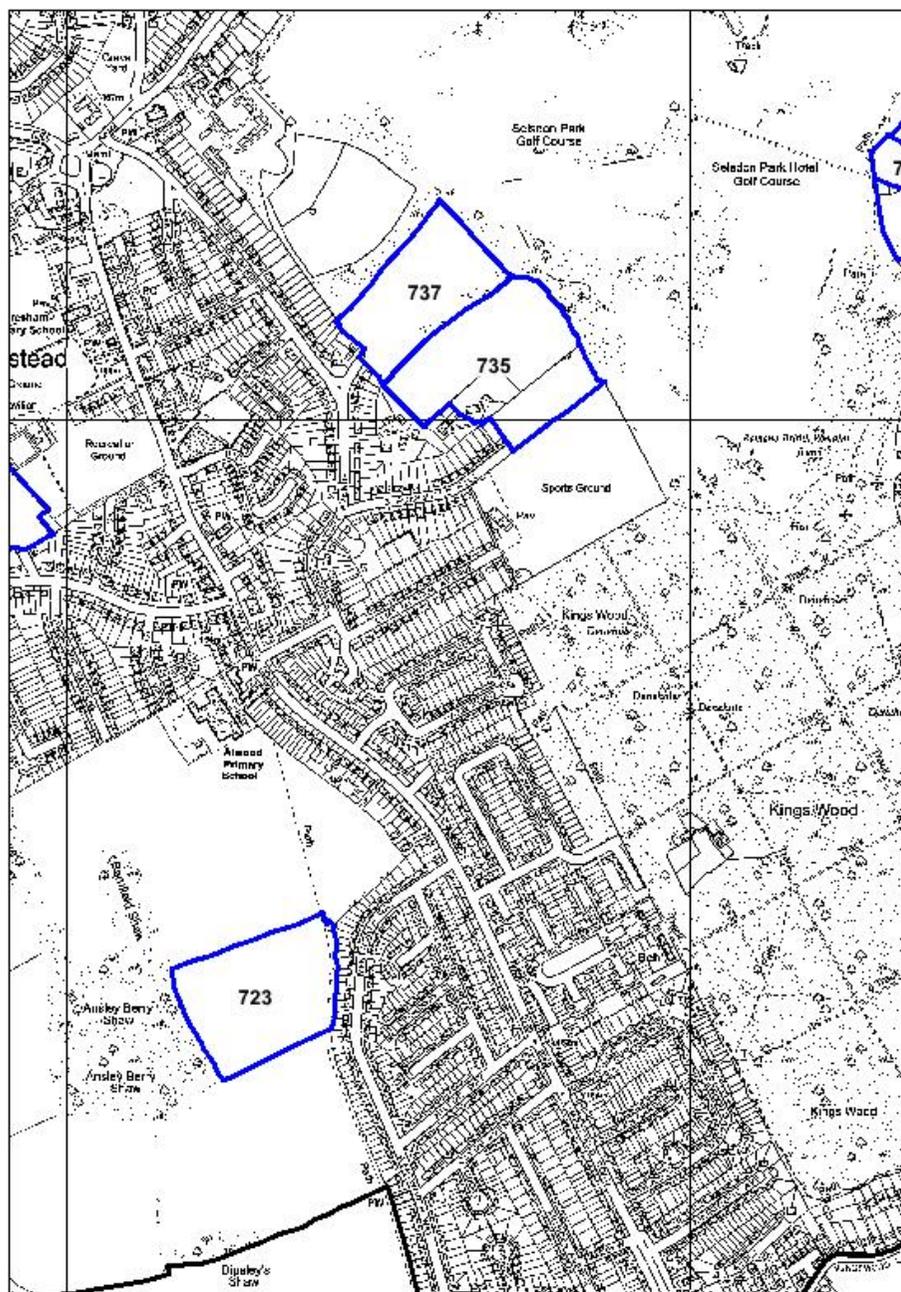
	Site 24	Site 518	Site 824	Site 826
No. of homes	21 to 42	66 to 120	11 to 28	14 to 25
PTAL range	1b	0	1b to 2	1b
Bus stop <5 mins walk	Yes	No	No	Yes
Train/tram <10 mins	No	No	No	No
East/West Croydon	Bottom 25%	Bottom 25%	Below average	Below average
Central London	Bottom 25%	Bottom 25%	Top 25%	Below average
Convenience shop (walk)	Best in borough	Above average	Top 10%	Best in borough
Primary school (walk)	Top 25%	Below average	Top 10%	Top 10%
Secondary school	Top 10%	Above average	Top 10%	Best in borough
GP	Above average	Below average	Top 10%	Above average
Pharmacy	Top 25%	Top 25%	Best in borough	Top 10%



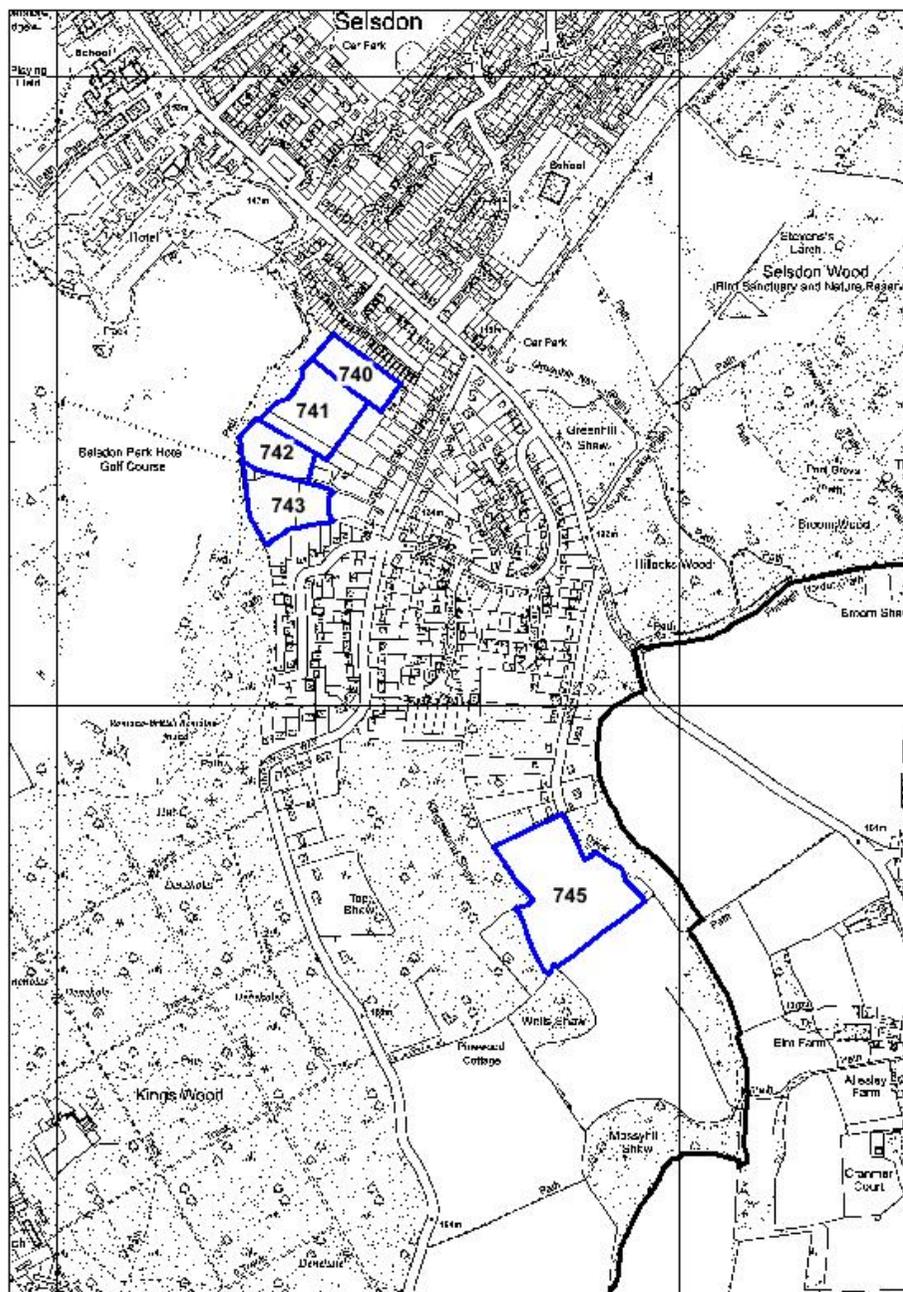
	Site 29	Site 498	Sites 694/695	Sites 697/698	Site 916
No. of homes	16 to 34	3 to 5	12 to 73	12 to 81	55 to 117
PTAL range	0	0	0	0	0
Bus stop <5 mins walk	No	No	No	No	No
Train/tram <10 mins	No	No	No	No	No
East/West Croydon	Bottom 25%	Bottom 10%	Bottom 10%	Bottom 10%	Bottom 10%
Central London	Bottom 25%	Bottom 25%	Bottom 10%	Bottom 25%	Above average
Convenience shop (walk)	Worst in borough	Bottom 10%	Bottom 25%	Bottom 25%	Bottom 10%
Primary school (walk)	Above average	Worst in borough	Below average	Below average	Bottom 25%
Secondary school	Bottom 25%	Below average	Bottom 10%	Bottom 10%	Worst in borough
GP	Bottom 25%	Bottom 25%	Bottom 10%	Bottom 10%	Worst in borough
Pharmacy	Bottom 25%	Bottom 25%	Bottom 10%	Bottom 10%	Worst in borough



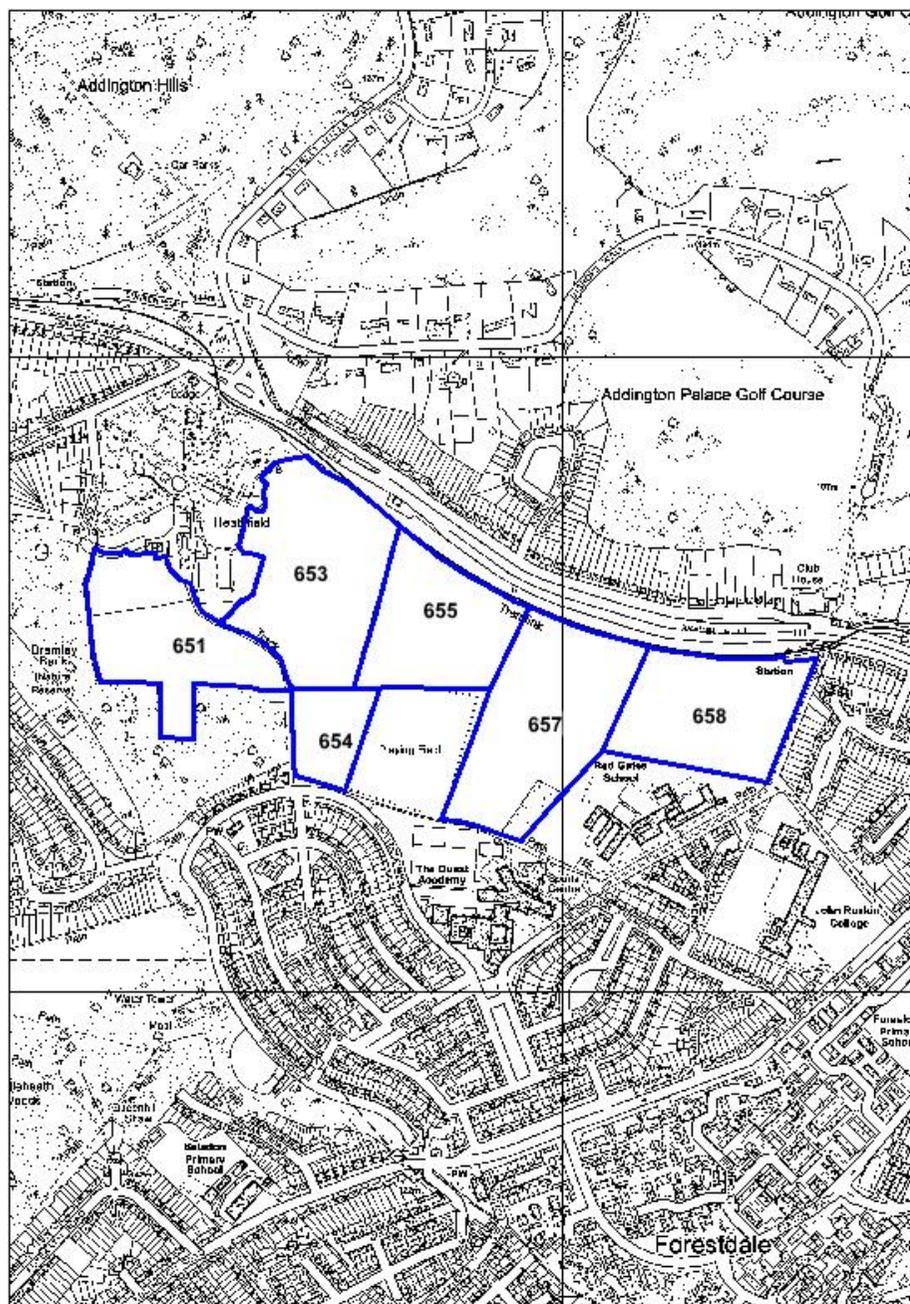
	Site 440	Site 531	Site 532	Site 712	Site 713
No. of homes	268 to 521	252 to 500	21 to 40	70 to 100	29 to 58
PTAL range	1a to 1b	0 to 1b	1a to 1b	1a to 1b	1b
Bus stop <5 mins walk	Yes	Yes	Yes	No	Yes
Train/tram <10 mins	No	Yes	No	No	No
East/West Croydon	Above average	Top 25%	Below average	Above average	Top 25%
Central London	Top 25%	Top 10%	Above average	Above average	Top 10%
Convenience shop (walk)	Top 25%	Best in borough	Top 25%	Above average	Top 10%
Primary school (walk)	Below average	Bottom 25%	Below average	Above average	Bottom 25%
Secondary school	Top 25%	Above average	Top 25%	Above average	Above average
GP	Top 25%	Best in borough	Top 25%	Below average	Top 10%
Pharmacy	Above average	Top 25%	Above average	Below average	Above average



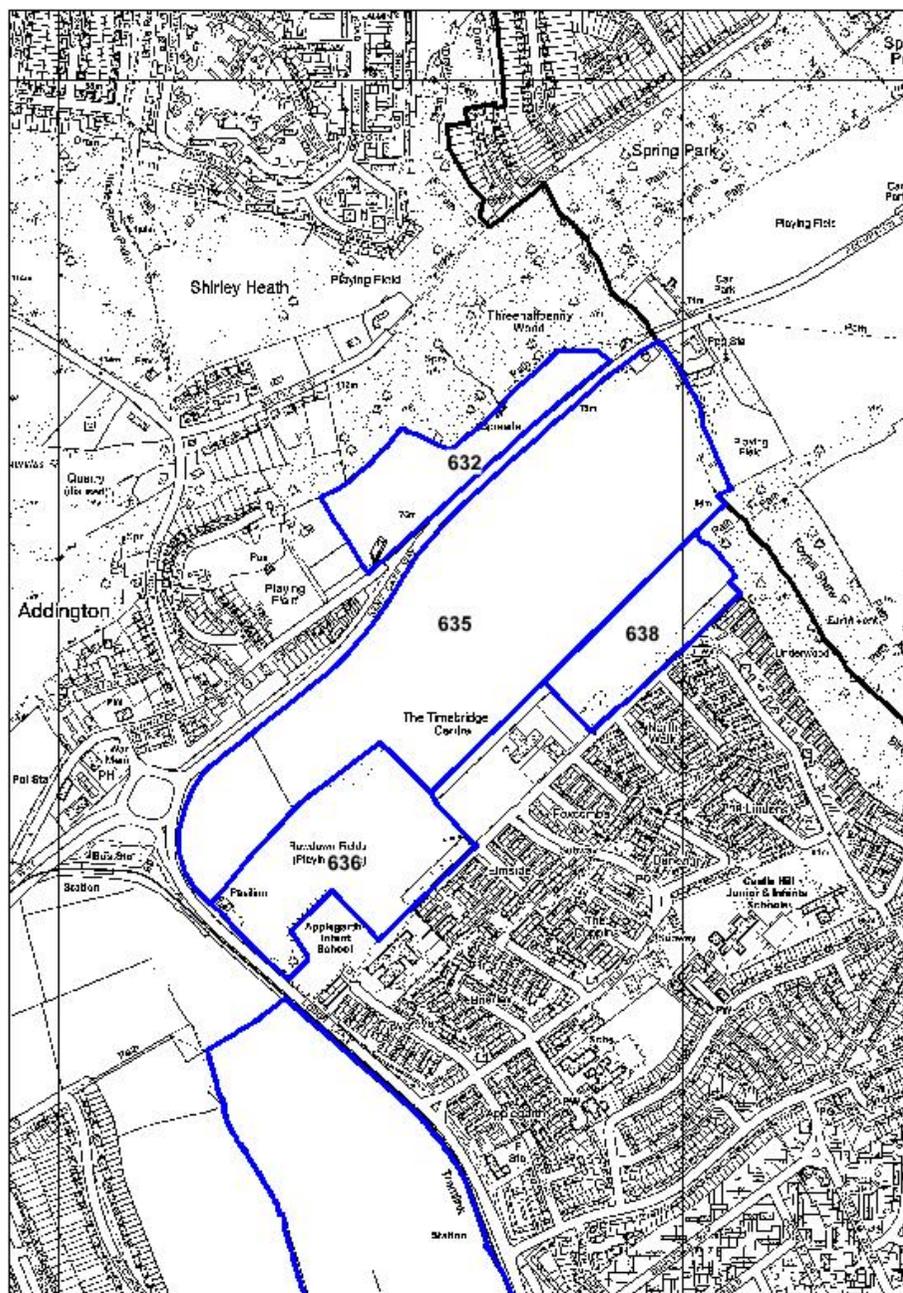
	Site 723	Site 735	Site 737
No. of homes	159 to 339	140 to 272	94 to 183
PTAL range	1a to 1b	0 to 1a	1a
Bus stop <5 mins walk	No	No	No
Train/tram <10 mins	No	No	No
East/West Croydon	Above average	Below average	Below average
Central London	Top 25%	Below average	Below average
Convenience shop (walk)	Top 10%	Above average	Above average
Primary school (walk)	Above average	Above average	Above average
Secondary school	Below average	Below average	Below average
GP	Above average	Below average	Below average
Pharmacy	Below average	Top 25%	Top 25%



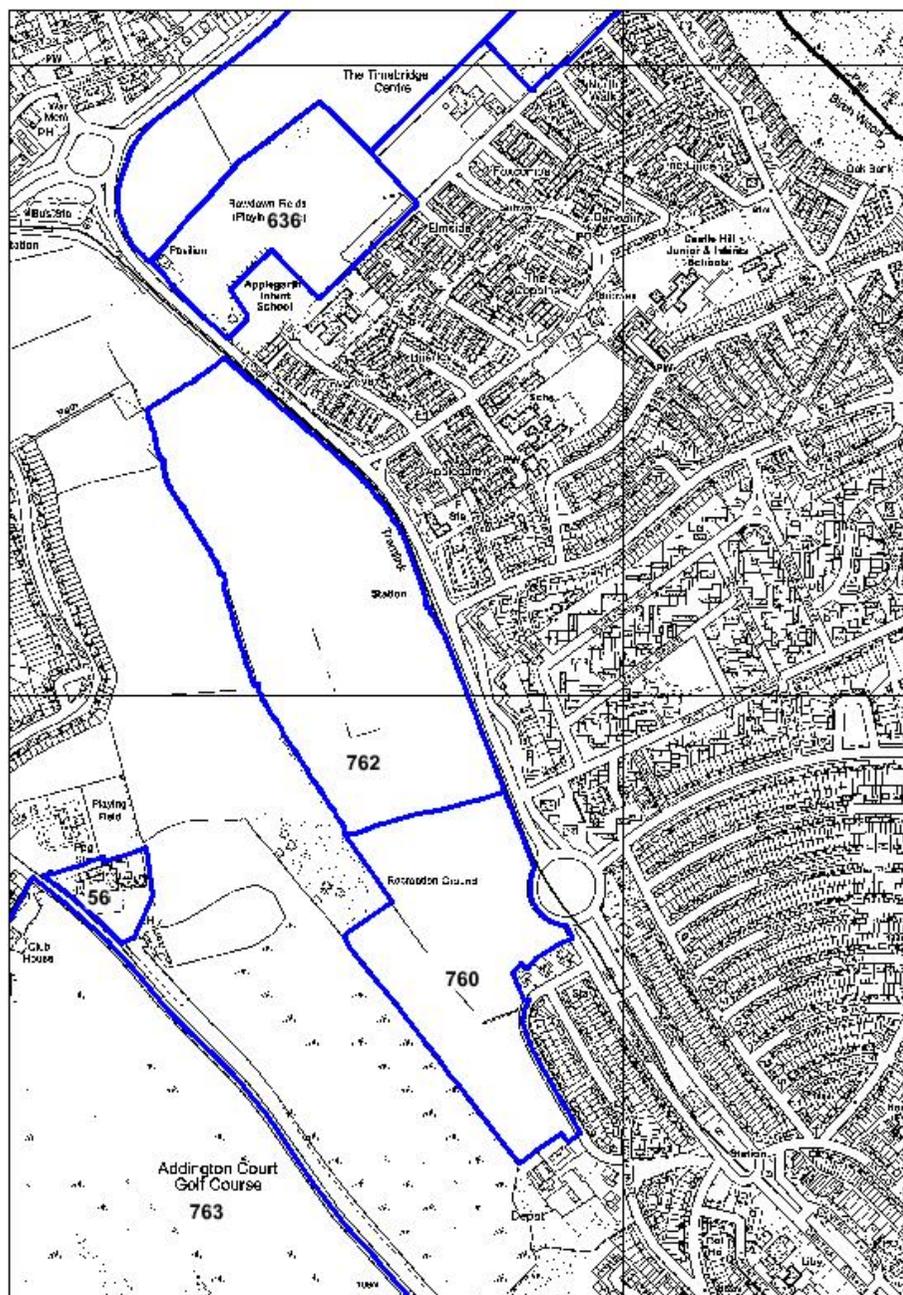
	Site 740	Site 741	Site 742	Site 743	Site 745
No. of homes	27 to 56	40 to 84	40 to 84	39 to 83	108 to 230
PTAL range	1b	1b	0 to 1b	0 to 1b	0
Bus stop <5 mins walk	No	No	No	No	No
Train/tram <10 mins	No	No	No	No	No
East/West Croydon	Top 25%	Top 25%	Above average	Above average	Below average
Central London	Above average	Above average	Below average	Below average	Below average
Convenience shop (walk)	Below average	Below average	Below average	Below average	Bottom 10%
Primary school (walk)	Top 10%	Top 10%	Top 25%	Top 25%	Below average
Secondary school	Below average	Below average	Below average	Below average	Bottom 25%
GP	Above average	Above average	Above average	Above average	Bottom 25%
Pharmacy	Top 25%	Top 25%	Top 25%	Above average	Bottom 25%



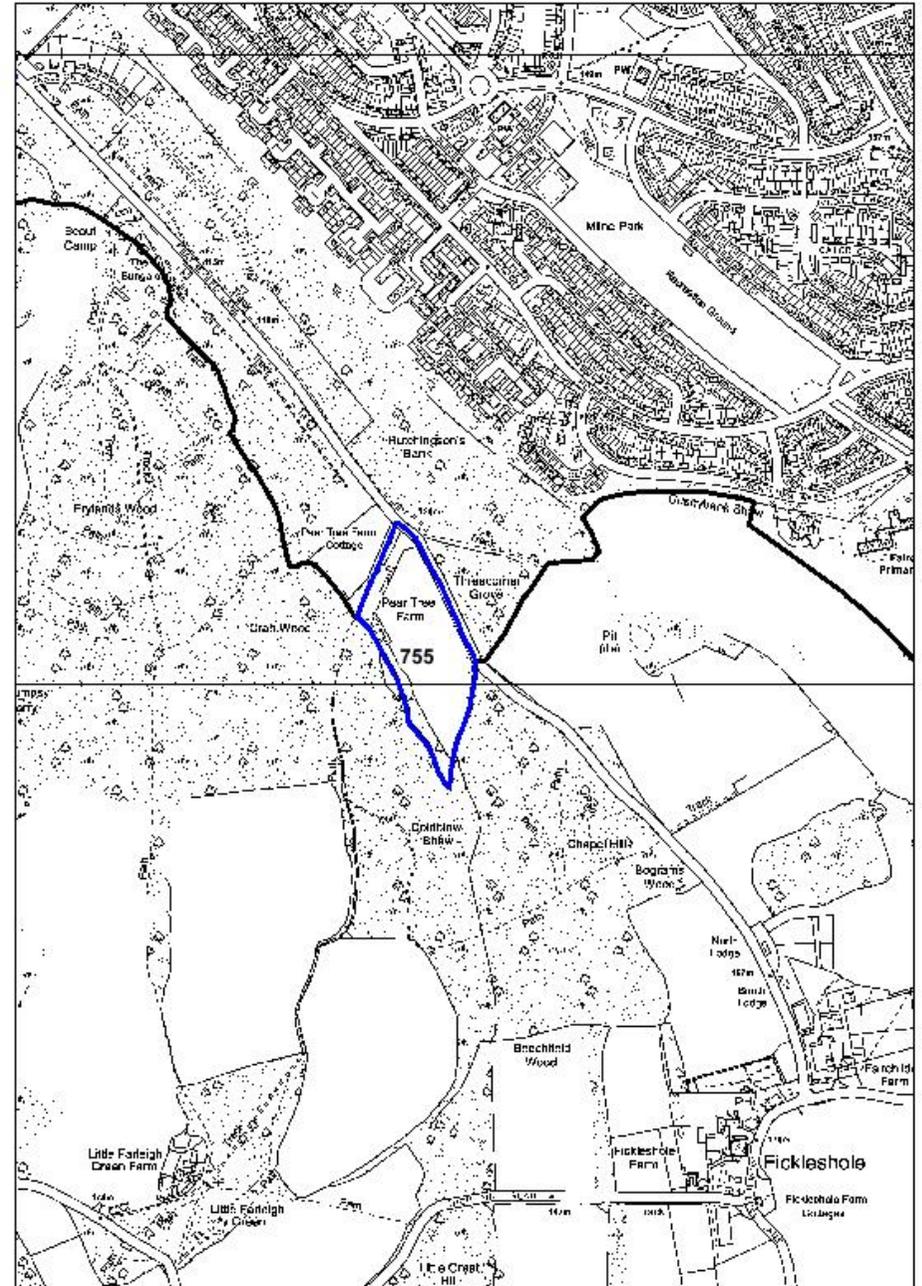
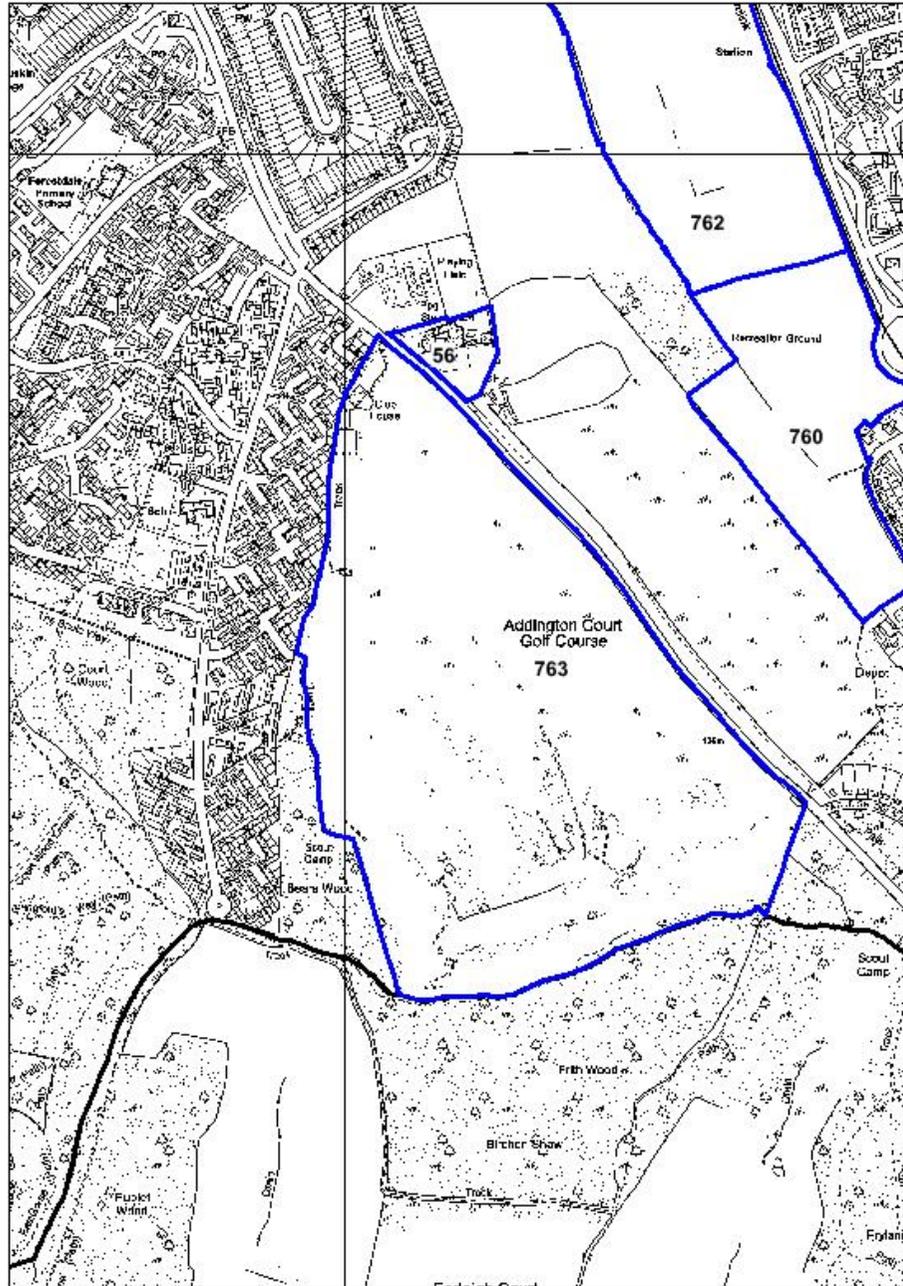
	Site 651	Site 653	Site 654	Sites 655/657	Site 658
No. of homes	128 to 357	171 to 456	44 to 123	281 to 638	127 to 245
PTAL range	1b to 2	1b to 2	1b	1a to 2	2 to 3
Bus stop <5 mins walk	No	Yes	No	Yes	Yes
Train/tram <10 mins	Yes	Yes	No	Yes	Yes
East/West Croydon	Top 25%	Top 10%	Above average	Top 10%	Best in borough
Central London	Top 25%	Top 10%	Above average	Above average	Best in borough
Convenience shop (walk)	Below average	Below average	Above average	Above average	Top 25%
Primary school (walk)	Bottom 10%	Bottom 25%	Top 25%	Below average	Above average
Secondary school	Below average	Below average	Top 10%	Above average	Top 25%
GP	Below average	Above average	Below average	Above average	Top 10%
Pharmacy	Bottom 25%	Below average	Below average	Below average	Top 25%



	Site 632	Site 635	Site 636	Site 638
No. of homes	132 to 200	880 to 2,000	335 to 967	139 to 271
PTAL range	1a to 1b	1b to 4	1b to 4	1b to 2
Bus stop <5 mins walk	No	Yes	Yes	No
Train/tram <10 mins	No	Yes	Yes	No
East/West Croydon	Above average	Top 10%	Top 10%	Above average
Central London	Below average	Top 25%	Top 25%	Below average
Convenience shop (walk)	Above average	Top 10%	Top 10%	Top 25%
Primary school (walk)	Bottom 25%	Above average	Above average	Above average
Secondary school	Below average	Above average	Above average	Above average
GP	Below average	Top 25%	Top 25%	Top 25%
Pharmacy	Below average	Top 10%	Top 25%	Top 10%



	Site 56	Site 760	Site 762	Site 763
No. of homes	59 to 105	352 to 834	2,208 to 2,196	Included in next table
PTAL range	1b	2 to 3	0 to 4	
Bus stop <5 mins walk	No	Yes	Yes	
Train/tram <10 mins	No	Yes	Yes	
East/West Croydon	Below average	Above average	Above average	
Central London	Below average	Above average	Above average	
Convenience shop (walk)	Above average	Top 25%	Top 25%	
Primary school (walk)	Above average	Above average	Above average	
Secondary school	Above average	Above average	Above average	
GP	Below average	Top 25%	Top 25%	
Pharmacy	Above average	Top 25%	Top 25%	



5. Summary of findings of the assessment of sites against the sustainability criteria

Just five sites were ranked at least above average across all categories, with the highest PTAL rating of each of these sites is either 3 or 4. All of the sites were within 5 minutes walk of a bus stop and 10 minutes of a tram stop. The sites were:

- Site 658 at Gravel Hill;
- Sites 635 and 636 at Kent Gateway; and
- Sites 760 and 762 at Lodge Lane/North Downs Crescent.

A further four sites were ranked at least above average in all but one category and were also within 5 minutes walk of a bus stop⁵. These sites, perhaps unsurprisingly, all have a lower maximum PTAL rating, being either 1b or 2. The sites were:

- Site 764 in Coulsdon; and
- Sites 440, 531 and 713 at Mitchley Avenue/Mitchley Hill.

The table below summarises the findings for all the other sites:

Number of categories ranked 'Below average' or lower	Sites within 5 minutes walk of a bus stop or 10 minutes walk of a train station/tram stop	Sites more than 5 minutes walk of a bus stop or 10 minutes walk of a train station/tram stop
1	<i>See above</i>	<ul style="list-style-type: none"> • Site 824 (Old Coulsdon) • Site 638 (Kent Gateway)
2	<ul style="list-style-type: none"> • Sites 24 and 826 (Old Coulsdon) • Site 532 (Mitchley Avenue/Mitchley Hill) <ul style="list-style-type: none"> • Sites / (Gravel Hill) • Site 535 (Former pitch and putt, New Addington) <ul style="list-style-type: none"> • Site 763 (Featherbed Lane) 	<ul style="list-style-type: none"> • Site 712 (Mitchley Avenue/Mitchley Hill) <ul style="list-style-type: none"> • Site 723 (Wentworth Way) • Sites 735 and 737 (East of Sanderstead) <ul style="list-style-type: none"> • Sites 740 and 741 (Kingswood Way) <ul style="list-style-type: none"> • Site 654 (Gravel Hill)

⁵ Sites 764 and 531 are also within ten minutes walk of a train station

Number of categories ranked 'Below average' or lower	Sites within 5 minutes walk of a bus stop or 10 minutes walk of a train station/tram stop	Sites more than 5 minutes walk of a bus stop or 10 minutes walk of a train station/tram stop
3	<ul style="list-style-type: none"> • Site 769 (Cane Hill south) 	<ul style="list-style-type: none"> • Sites 742 and 743 (Kingswood Way) <ul style="list-style-type: none"> • Site 56 (Featherbed Lane) • Site 927 (Shirley Park golf course)
4	<ul style="list-style-type: none"> • Site 676 (Woodcote) • Site 914 (Cane Hill south) • Site 653 (Gravel Hill) 	<ul style="list-style-type: none"> • Site 905 (Woodcote) • Site 518 (Old Coulsdon) • Site 661 (Coombe Road Nurseries)
5	<ul style="list-style-type: none"> • Site 677 (Woodcote) • Site 767 (Cane Hill south) • Site 651 (Gravel Hill) 	<ul style="list-style-type: none"> • Site 768 (Cane Hill south) • Site 632 (Kent Gateway)
6	-	<ul style="list-style-type: none"> • Site 772 (The Dutch Village) <ul style="list-style-type: none"> • Site 29 (Kenley)
7	-	<ul style="list-style-type: none"> • Sites 498, 694, 695, 697, 698 and 916 (Kenley) <ul style="list-style-type: none"> • Site 745 (Beech Way) • Site 755 (Featherbed Lane)

Accessibility is not the only consideration in identifying possible urban extensions. Other considerations include impact on heritage designations, and how any built form would integrate with the existing urban area. For those sites that are already the most accessible, when you take these factors into account it has the following implications:

- The sites on Kent Gateway (sites 635 and 636) become less suitable for an urban extension because of the impact on the Addington Village Conservation Area;
- Site 713 at Mitchley Avenue, on its own would not integrate with the existing built form of the area and so is considered to be less suitable for an urban extension; and
- Site 531, also on Mitchley Avenue, would only integrate well with the existing built form if it were a small linear development along Mitchley Avenue (and therefore, not an urban extension), or if it were undertaken as part of the development of all the sites identified along Mitchley Avenue and Mitchley Hill.

Site 658, whilst itself one of the most accessible Green Belt locations in the borough, would also not on its own integrate well with the existing urban area. Combining the site with neighbouring sites 654, 655 and 657 would enable a sustainable and critical mass urban extension, including improving access to public transport across this area of Green Belt.

For these reasons the following combination of sites are proposed, in the Croydon Local Plan review (Issues and Options) consultation, as possible urban extensions, if Green Belt is to be released for development:

Sites	Reason why selected as a possible urban extension (if Green Belt is released for development)
658 with 654, 655 and 657 (Gravel Hill)	Site 658 has the best public transport access of any Green Belt site in Croydon, in line with national planning policy on release of land from Green Belt. Adding sites 654, 655 and 657 enables the development to be integrated into the existing built form, taking advantage of the contours of the site. In doing so the access to public transport from sites 654, 655 and 657 could be improved. A notable urban extension will assist the viability for the delivery of physical and social infrastructure and a master planned approach.
760 and 762 (Lodge Lane/North Downs Crescent)	Together these sites have some of the best access to public transport of any Green Belt site in Croydon, being served by several adjacent tram stops and bus routes. They could be integrated well with the neighbouring urban area whilst still maintaining a strategic gap between New Addington and Selsdon.
Site 440	Site 440 and Site 764 have similar levels of public transport accessibility. Both also perform less of a Green Belt function than other sites proposed as Urban Extensions. The potential unmet housing need is not high enough to warrant the release of both sites. Site 440 has been proposed over Site 764 as there is interest from a national house builder (therefore it is potentially deliverable in the future against the test set by national planning policy) and it is in effect completing a development begun in the interwar period that was never completed due to the onset of World War II.