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2 June 2017

Dear Chris

**CROYDON LOCAL PLAN: STRATEGIC POLICIES – PARTIAL REVIEW AND DETAILED POLICIES AND PROPOSALS EXAMINATION**

**FURTHER RESPONSE TO HEARING SESSION 8 (GREEN BELT) REGARDING COOMBE FARM, OAKS ROAD, CROYDON, CR0 5HL**

Indigo Planning has prepared this note on behalf of AA Homes Ltd and follows our representations submitted to the Regulation 19 consultations dated October 2016 and our attendance at the Examination Hearing on 23 May 2017.

Specifically, this letter provides clarification requested by the Inspector regarding the Coombe Farm site as a potential location for residential development.

**Background**

The NPPF (paragraph 83) says that Green Belt boundaries should only be altered in “exceptional circumstances”, whilst having regard to their intended permanence in the long term.

Within our submitted representations and through the Examination hearings we have emphasised that the Council’s inability to meet its objectively assessed housing needs (OAN). We have also questioned the ability for the Council to rely on brownfield and minor MOL changes to meet the identified housing target of 1,592 dwellings per annum (dpa).

On this basis, we have identified that exceptional circumstances exist to warrant a review of the Green Belt and/or to identify suitable sites within the Green Belt which could meaningfully contribute to the Council’s housing requirements. As previously developed land the Coombe Farm site provides an opportunity for development within the Green Belt.

**Coombe Farm**

The submission version of the Detailed Policies and Proposals Local Plan

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indicates that Coombe Farm could accommodate up to 90 dwellings subject to impact on the openness of the Green Belt.

During the Examination Hearings the Inspector asked for the volume calculations of the existing site to help inform the possible level of development which could be achieved without materially impacting the openness of the Green Belt.

We enclose these calculations along with potential development layouts to demonstrate what could be achieved on the site.

#### Existing volume

The existing buildings have a cumulative volume of 14,772m<sup>3</sup>. This does not include the majority of existing storage containers (subject to a pending application for their retention) within the site that would add a further 626 sqm of existing built massing within the site.

#### Development options

We have enclosed two potential development options both of which seek to retain the original farmhouse building. The first option would provide a similar volume of development as is existing and would deliver an additional 26 houses on top of the residential conversion of the existing buildings.

With regards option 1, subject to detailed design and a visual landscape impact assessment we would be confident in demonstrating that there would be no material impact on the openness on the Green Belt.

The second option would provide a more comprehensive development of the entire site that would deliver around 77 homes in addition to the conversion of the retained buildings (circa 13 units). This would increase the building volume by approximately 20,000m<sup>3</sup>.

Option 2 would provide a more comprehensive development capable of providing additional housing to assist the Council with its housing needs. Whilst this proposal would result in an increase in built-form across the site, the design of the development would in any event seek to limit the impact on openness through careful massing and design and landscaping treatment.

It is of note that the Housing White Paper identifies a proposed change to the NPPF to reduce the openness test in the Green Belt (no substantial harm as opposed to no greater impact) where the scheme would contribute to the delivery of starter homes. The ability to provide an additional quantum of development on the site could enable the delivery of starter homes within the site. If this change is applied as anticipated, the scheme would only need to demonstrate that the development did not have a substantial harm on the openness of the Green Belt which we believe it would not.

The site's redevelopment would present an opportunity to formalise the site

which has been developed sporadically and rather incoherently over-time. This would provide a significant benefit to the character of the immediate area, the public realm and the wider Green Belt.

In this context, the site could come forward for redevelopment as not inappropriate development. The emerging plans provide an opportunity to crystallise this opportunity so that the site can make a significant contribute to the Council's housing trajectory.

#### Exceptional circumstances

As noted above, we consider there are exceptional circumstances to allow for the site to be excluded from the Green Belt, which would allow for option 2 being delivered without the need to assess the impact on the openness of the Green Belt. Notwithstanding this, any development would still need to be carefully designed in respect of environmental impact, visual impact, access and amenity.

#### **Conclusion**

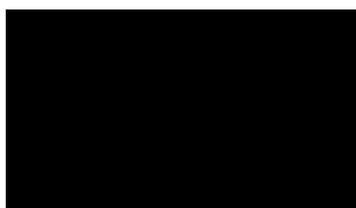
We trust that the above and the enclosed is of use and look forward to the comments about the site in the Inspector's report to the Examination.

The Coombe Farm site is available and deliverable now to provide much needed housing to assist Croydon with meeting its identified OAN. It therefore is capable of being taken out of the Green Belt due to the exceptional circumstance, namely the failure of the Council to meet the OAN.

Should the site need to be retained as Green Belt, the enclosed documentation shows two options as to how development can be delivered whilst having regard to the openness of the Green Belt.

If you or the Council have any further questions, please do not hesitate to contact me or my colleagues Matthew Hard, Hannah Baker or Michael Wood.

Yours sincerely



Doug Hann

Enc: Calculated volume of existing site  
Proposed development with same volume  
Proposed development with increased volume  
3d model of existing

3d model of proposed scheme with same volume  
3d model of proposed scheme with increased volume