

3 March 2016

Addington Golf Club, Shirley Church Road

in the London Borough of Croydon

planning application no.15/01848/P

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

Demolition of existing clubhouse, construction of replacement clubhouse, changes to existing access and parking infrastructure, demolition of existing dwelling, construction of replacement house, and construction of maintenance building.

The applicant

The applicant is **Altonwood Group**, and the architect is **Sonnemanntoon Architects**.

Strategic issues

The key strategic issue assessed in this expedite report is **land use principle** – whether the **scale of redevelopment of the golf course facilities on Green Belt** is appropriate and whether **very special circumstances** have been demonstrated that justify the proposed redevelopment.

Recommendation

That Croydon Council, be advised that the application does not comply with the London Plan, for the reasons set out in paragraph 30 of this report and if the Council resolves to refuse permission, it need not refer the application back to the Mayor.

Context

1 On 25 January 2016 the Mayor of London received documents from Croydon Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 4 March 2016 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Category 3D of the Schedule to the Order 2008:

"Development – (a) on land allocated as Green Belt or Metropolitan Open Land in the development plan, in proposals for such a plan, or in proposals for the alteration or replacement of such a plan; and (b) which would involve the construction of a building with a floor space of more than 1,000 square metres or a material change in the use of such building."

3 Once Croydon Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision, as to whether to direct refusal or allow the Council to determine it itself, unless otherwise advised. In this instance if the Council resolves to refuse permission it need not refer the application back to the Mayor.

4 The Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

5 The application site comprises an area of 0.2ha within the grounds of The Addington Golf Club, in Metropolitan Green Belt. The site is situated within a locally designated site of Nature Conservation Importance; there is also a Local Nature Reserve within 2km of the site located at Bramley Bank. The site also resides within a registered park and garden and an Archaeological Priority Zone. The site is located facing onto Shirley Church Road between the semi-rural village of Addington and the more suburban village of Shirley. The nearest settlements are Croydon at 4km north-west, Bromley at approximately 5.7km north-east and Purley approximately 5.5km to the south-west. It is predominantly hard standing, with a proportion laid to lawn, hedging and trees.

6 The site currently contains one large, single storey brick building currently utilised as the clubhouse, two smaller single storey, auxiliary service buildings and one two storey house, currently owned by The Addington Golf Club. Access to the application site is via Shirley Church Road which connects to the centre of Addington Village, and forms a direct route into Croydon town centre. The A2022 which runs past Addington Village also links to the A232, and subsequently the M25, approximately 14km to the east. The nearest section of the Transport for London Road Network is the A232 Wickham Road, which is 1.5km north of the site. The nearest section of the Strategic Road Network is the A215 Shirley Road, approximately 2.1km to the north. The tram network runs along the southern periphery of the site and there are tram stops at Coombe Lane, Gravel Hill and Addington all are within 1km of the main site access. The nearest bus stops to the site are located on Upper Shirley Road, approximately 1.3km from the site, which are served by two bus services. The site has a public transport accessibility level (PTAL) of 0 (on a scale of 1 to 6b, where 6b is the most accessible).

Details of the proposal

7 A full planning application for the redevelopment of the clubhouse and supporting infrastructure at The Addington Golf Club is sought which comprises the following elements;

- Demolition of existing clubhouse and construction of replacement clubhouse.
- Demolition of existing dwelling and construction of replacement dwelling.
- Formalise second site entrance and driveway.
- Alterations to existing carpark.
- Construction of new maintenance building.
- Landscaping improvements.

8 The core of the redevelopment proposal is the replacement of the clubhouse which comprises; reception and administration offices, committee room, conference facilities, society rooms, members lounge, spike bar and snack kitchen, pro shop, male and female changing / locker room facilities, staff changing rooms, restaurant, kitchens, visitors and staff WC, and staff accommodation.

Case history

9 There is no case history relevant to the current application.

Strategic planning issues and relevant policies and guidance

10 The relevant issues and corresponding policies are as follows:

- Green Belt *London Plan;*
- Transport *London Plan; the Mayor's Transport Strategy;*

11 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plans in force for the area are the 2013 Croydon Local Plan Strategic Policies DPD and Croydon Replacement Unitary Development Plan (UDP) 2006 (as saved in 2009) and the 2015 London Plan (Consolidated with Alterations since 2011).

12 The National Planning Policy Framework and Technical Guide to the National Planning Policy Framework and the Minor Alteration to the London Plan (MALP,2015), are also relevant material considerations.

Land use principle: Redevelopment of golf course facilities on Green Belt

13 The entire site is located on Green Belt land. London Plan Policy 7.16 'Green Belt' notes that *"the strongest protection should be given to London's Green Belt, in accordance with national guidance. Inappropriate development should be refused, except in very special circumstances. Development will be supported if it is appropriate and helps secure the objectives of improving the Green Belt as set out in national guidance."*

14 The National Planning Policy Framework (paragraph 89) sets out that only development associated with agriculture, forestry, outdoor sport and recreation, limited infilling and redevelopment of existing sites is appropriate in the Green Belt. All other forms of development are, by definition, 'inappropriate'. The NPPF further states that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt and '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. Therefore, in order for the 'inappropriate' development to be acceptable in the Green Belt, the onus is on the applicant to demonstrate that 'very special circumstances' do exist.

15 The applicant put forward arguments based on the exceptions outlined in the NPPF and stated that the redevelopment does not constitute 'inappropriate development'. The applicant's arguments can be summarised as;

- The proposed redevelopment complies with National and local planning policies, specifically by its nature of its limited extension, alteration or replacement of existing dwellings and essential facilities for outdoor sport and recreation as outlined in the NPPF.
- The proposed redevelopment maintains the openness of the existing development site without proliferating the volume of built development significantly.
- The proposed redevelopment represents appropriate development in the Metropolitan Green Belt. It does not seek to diminish the boundaries of the Green Belt nor does it compromise existing designations.

16 There is no doubt that the golf course is an appropriate use in Green Belt, as it can be categorised as an outdoor sport and recreation and meets the above exception criteria in the NPPF (paragraph 89).

17 GLA officers acknowledge that the extent to which the plans of the buildings cover of the site has been considered. The existing buildings though of a smaller floor area, are linear in character and have longer elevations at the frontages, but they are also only single and single & half storey in height. Officers, also acknowledge the benefits of rationalising the car park layout from the existing. However, the NPPF test in respect of the replacement of a building states;

- "...the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces."

Building Parameters	Proposed	Existing	Increase
Footprint in sqm (GEA)	2,158	1,343	815sqm = 61%
Floor space in sqm (GEA)	3,671	1,258	2,413sqm = 192%
Clubhouse Ridge Height (mts)	8.860	4.580	4.280m = 94%

18 The replacement of the original building is in the same use, but as shown above in the table, it is materially and significantly larger than the one it replaces. Therefore, due to this the proposed redevelopment fails to meet the NPPF exception and is inappropriate development.

19 For inappropriate development, very special circumstances should be demonstrated and the applicant has not submitted any supporting report on 'very special circumstances' that may justify the redevelopment on the Green Belt.

20 In light of the above, the Mayor does not support the scheme and advises Croydon Council that the application does not comply with the London Plan and does not need to be consulted again, if it resolves to refuse permission.

Transport for London's comments

Car parking

21 The application proposes to increase the car parking provision from 76 spaces to 125 spaces, including 7 Blue Badge spaces. Considering the location of the site in an area of limited accessibility to public transport, the use of the site and the fact that most journeys are likely to occur outside of network peak hours, the car parking provision proposed is acceptable on this occasion. Whilst there is no standard in the London Plan for the number of Electric Vehicle Charging Points (EVCPs) which should be provided for a sports facility, TfL suggests the applicant provides 20% active and 10% passive spaces for the employment element. Therefore, for the proposed 125 car parking spaces, a total of 37 EVCP spaces should be provided (25 active, 12 passive).

Cycle parking

22 No cycle parking has been proposed for the site. TfL requests 20 spaces are provided, to reflect the uplift in floor area, in addition to 1 space for staff, in line with the London Plan Standards for a D2 use. A minimum of 2 spaces should also be provided for the proposed 5 bed cottage. Cycle parking should be located in a secure, sheltered and accessible location.

Trip generation

23 TfL welcomes the multi-modal trip generation surveys which have been carried out. TfL has reviewed the data and is satisfied that the development is unlikely to have a significant impact on public transport capacity.

Travel planning

24 Given the likely number of staff on site, TfL require the applicant to prepare a travel plan Statement, in accordance with TfL's travel plan guidance. The final version of the travel plan statement, including all agreed measures therein, should be secured, enforced, monitored and reviewed as part of the section 106 agreement, in accordance with London Plan policy 6.3.

Construction

25 TfL requests a construction logistics plan (CLP) and delivery and servicing plan (DSP) in line with TfL's guidance, is submitted and secured by condition. Guidance on the methodology and further information regarding construction routing has been sent to the council. Maintaining cycle safety during construction and ensuring construction vehicles avoid key strategic routes and peak hour movements is essential.

Community Infrastructure Levy (CIL)

26 In accordance with London Plan Policy 8.3, the Mayoral Community Infrastructure Levy (CIL) came into effect on 1st April 2012. All new developments that create 100sqm or more of additional floor space are liable to pay the Mayoral CIL. The levy is charged at £20 per square metre of additional floor space in the Borough of Croydon.

Local planning authority's position

27 Croydon Council planning officers have confirmed they will be recommending refusal to permission.

Legal considerations

28 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged or direct the Council under Article 6 of the Order to refuse the application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

29 There are no financial considerations at this stage.

Conclusion

30 London Plan policy on **land use principle** is the key strategic issue assessed. In general, the application does not comply with these policies, for the following reasons:

- **Redevelopment of Golf Course facilities on Green Belt:** The scale of the proposed redevelopment of the Golf Course facilities on site is unacceptable. It would have excessive harm to the openness of the Green Belt. It fails to meet the exceptions in the NPPF. Therefore, it is inappropriate development.
- There are no **very special circumstances** provided that justify the proposal.

31 **Transport** comments provided by TfL should be considered.

32 The Mayor **does not need** to be consulted again if the Council resolves to refuse permission.

For further information, contact GLA Planning Unit (Development & Projects Team):

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