

**Addiscombe, Woodside &  
Shirley Leisure Gardens Ltd.**

(Formerly Addiscombe & Woodside Allotments Society (1921) Ltd)  
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Spatial Planning Service,  
6th Floor Zone B, Bernard Weatherill House  
8 Mint Walk  
Croydon, CR0 1EA

October 12th 2016

Dear Sirs,

**Croydon Local Plan: Strategic Policies - Partial Review (Proposed Submission) and the  
Croydon Local Plan: Detailed Policies and Proposals.  
Re: Policies SP7, DM27 and Alterations to the Green Grid.**

The Executive Committee representing 397 plot holders, 681 Shareholders (331 of whom are plot holders) and 140 Green Finger Members of the Addiscombe, Woodside & Shirley Leisure Gardens, Ltd (AWSLG), object to the proposal of de-designation of Metropolitan Open Land (MOL), and the re-designation to Local Green Space at our allotment site, as this does not comply with policies SP7, DM27, and the protection of the green grid.

We support the special protection given to Allotments both within the Croydon Local Plan and the London Plan. However it is our belief that the land at the Addiscombe, Woodside and Shirley Leisure Gardens does meet the criteria for Metropolitan Open Land status as defined in the London Plan:

MOL should satisfy 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.
- b) It includes open air facilities, especially for leisure, recreation sport, the arts and cultural activities, which serve the whole or significant parts of London.
- c) It contains features or landscapes (historical, recreational, biodiversity) of either national or metropolitan value.
  - i It forms part of a Green Chain or a link in the green infrastructure and meets one of the above criteria.

**We, the Executive Committee of the AWSLG, believe that we can demonstrate that our Allotment Site meets all of the above criteria.**

The London Wildlife Trust and The Campaign for the Protection of Rural England (CPRE London) both support our claim of meeting the criteria for MOL designation. In response to the previous Consultation on the Croydon Local Plan (November 2015), CPRE London wrote:

**Re SP7: Green Grid**

*'The designation of Metropolitan Open Land (MOL) at Shirley Oaks should not be removed. We believe the assessment that the land is separated from Ashburton Playing Fields is incorrect: there is a clear wildlife corridor between residential development and the Shirley Oaks Hospital Site. In addition, the fact that the allotments are protected via other means (due to their being allotments) is not a reason to discontinue their designation as MOL in particular **as they continue to meet MOL criteria in contributing features of nature conservation interest and as being part of the green chain of London.** Its particularly important that the designation of MOL for the allotments stays in place to ensure they are fully protected into the future'. Ref: Campaign for the Protection of Rural England CPRE London 16 December 2015, Re Consultation on Croydon Local Plan Strategic Policies- Partial Review and Alternative Options and the Croydon Local Plan.*

**The Review of Metropolitan Open Land (Land South of Shirley Oaks Hospital)**

**REF: CRITERIA C AND D:**

The AWSLG is nearing its 100th anniversary on its current site of 11 hectares and is blessed with a rural character and many mature oaks and other trees and shrubs which predate the society. The 380 or so allotment plots add significantly to the area's biodiversity because of their constantly changing and dynamic character. The norm is for most plots to be well cultivated but, at any time, about 10% will be temporarily fallow, and this pattern is very beneficial to a wide range of species, including badgers, foxes, bats, squirrels and a range of bird and insect life. There is evidence of badger setts within the grounds.

Therefore our large site is a key reserve for a great range of wildlife and provides a valuable **stepping stone** and **wildlife corridor** between Surrey, Hutchinson's Bank, Shirley Hills and South Norwood Country Park

This claim is supported by the London Wildlife Trust's objection to Croydon Council:

*'We believe that its open character is little different to the Ashburton Playing Fields (MOL) to the north, and helps in the overall ecological network of this part of the borough. The assessment that the land is separated from the Playing Fields is not supported on the ground: the broken fence provides an accessible corridor between these and the Shirley Oaks Hospital site. They also support the headwaters of the Chaffinch Brook flowing through to the Playing Fields and Long Lane Wood. In addition, that the allotments are protected via other means is not a reason to discontinue their designation as MOL, as they continue to meet MOL criteria in contributing to the openness of the site, and providing features of nature conservation interest.'* (Objection to the Croydon Local Plan Proposals London Wildlife Trust 2015)'

The National Planning Policy Framework, Section 11: Conserving and Protecting the Natural Environment, point 117, Page 27 states 'that to minimise impacts on biodiversity and geodiversity, planning policies should identify and map components of the local ecological networks, including the hierarchy of international, national and local designated sites for biodiversity, **wildlife corridors and stepping stones that connect them** and areas identified by local partnerships for restoration or creation'.

The mapping of local **designated sites for biodiversity**, is partially evident within the Croydon Local Plan but this did not take account of the MOL at the ASWLG site, therefore we would contend that policy DM27 is not consistent with National Planning Policy in support of this assertion: The London Plan Chapter 7, Policy 7.19: Biodiversity and access to nature, Policy F, paragraph 'e' states 'that Boroughs should **identify** and protect and enhance corridors of movement, such as green corridors, that are of strategic importance in enabling species to colonise, re- colonise and move between sites'.

Part of our site is a historic wet water meadow. This is managed as a wildlife meadow retaining the essential character of traditional cow parsley, buttercup meadow, but judicious plug planting has broadened the botanical spectrum and enabled many insects to increase or even colonise. Two

unusual butterfly species, Brown Argus and Marbled White have started breeding in the meadow and two RAP moths, Small Ranunculus and Toadflax Brocade, similarly. This strongly supports the connectivity point, in that they have been able to reach the meadow and colonise from adjacent areas - Hutchinson's Bank LNR and Shirley Hills.

These species have spread into the allotments as a whole and the informal butterfly transect data reflects this strongly. The changes are such that the AWSLG site and wildlife meadow will be entered into the United Kingdom Butterfly Moth Scheme dataset in 2017. It will join 1000+ sites across the United Kingdom which provide essential and up to date information about the state of the nation's butterflies. (The Butterfly Monitoring Scheme is run by CEH - Centre for Ecology and Hydrology - and BC - Butterfly Conservation). The data has been a substantial part of the recent "State of Nature 2016" publication. (Please see attached sheet of data regarding butterfly species, collected on the wildlife meadow over the past five years).

Additionally the whole site occupies the greater part of monad (1km square) TQ3566 and has provided data to the WCBS (Wider Countryside Monitoring Scheme ) which has contributed to the UKBMS dataset since 2009. This data confirms the increases in abundance and distribution of most species monitored at AWSLG.

It is noted that Croydon Council commissioned Thomson Ecology to review sites of nature conservation in 2014. (Review of Sites of Importance for Nature Conservation (Updated 2014) Thomson Ecology). Within the recommendations of the full report, point 7.21, page 24 noted the following: ' as the surveys were confined to existing SINC sites, it is likely that there are other habitats of principal importance in Croydon which lie outside of the currently designated sites'. Also, within The Summary and Main Recommendation, Point 1.2.2, page 5 states that as the brief did not include a review of Sites of Metropolitan Importance (SMI) in the borough, it was not possible to compare the SINC sites surveyed with those attaining the Metropolitan Standard

We believe that our Allotment Site would meet the SINC criteria and indeed the criteria for a Site of Metropolitan Importance (SMI). We conclude that a full assessment of the site should have been undertaken before any decision regarding the proposal for de-designation from MOL was made.

**In respect of this evidence we believe our land does meet criterion c): It contains features or landscapes (historical, recreational, biodiversity) of either national or metropolitan value and contend Policy DM 27 is not consistent with either the National or London Planning Policy. It also meets criterion d): It forms part of a Green Chain or a link in the green infrastructure and meets one of the above criteria.**

#### **REF: CRITERIA A AND B:**

Furthermore, our Allotment site, as an open-air facility which is distinctive from the built up area of Croydon, serves the plot holders who come from Croydon and from the adjacent boroughs, but is also accessible to the wider community in that our site is open to visitors who attend our events, and benefits community organizations such as Shirley Neighbourhood Care, via the Open Gardens initiative, and the Shrublands Estate Food Bank to which we donate surplus produce. Our Trading Hut is open to the general public, who may join our Green Finger Club in order to buy gardening supplies from us. Our plot holders view our site not just as a place to cultivate fruit and vegetables, but also as a strong social community where friendships and mutual support help to maintain everyone's health and well-being. **In light of this, we would argue that AWSLG land does meet the following two MOL criteria: a) It contributes to the physical structure of London by being clearly distinguishable from the built up area and b) It includes open air facilities, especially for leisure, recreation sport, the arts and cultural activities, which serve the whole or significant parts of London.**

#### **REF: CRITERION D:**

The review of Metropolitan Open Land south of Shirley Oaks Hospital states that this land does not meet MOL criteria on the grounds that there is a physical barrier between Ashburton Playing Fields and the land south of Shirley Oaks Hospital. However, it has been demonstrated that a gate, open to the public, does exist in the fence around Shirley Oaks Hospital previously deemed to be a continuous barrier. There is also a gate opposite, in Poppy Lane, which provides access to the Allotments. Furthermore within a short walking distance (approximately 100 metres) from our main entrance in Glenthorne Avenue there is open access to the Ashburton Playing Fields. Therefore this area as a whole currently gives direct access to the Saffron Way Green Chain: This Green Chain was confirmed by Croydon Council's Cabinet Member for Homes, Regeneration & Planning in response to question no: PQ090-16.

**In respect of the above evidence we firmly believe that our site meets the MOL criterion d) in that it forms part of a Green Chain or a link in the green infrastructure.**

**It is our firm opinion that the policy DM27 is not positively prepared, justified or consistent with National Planning Policy, and therefore we would conclude that the Allotment Site does continue to meet the criteria for MOL. To support this claim we recognise we may submit additional evidence until May 2017.**

We would like to make representation at the Public Examination with the Planning Inspector.

Yours faithfully,

signed on behalf of the AWSLG Executive Committee,

Margaret W. Menezes  
Chair

Penelope M. Perry  
Secretary