

Wandle Park, West Croydon

in the London Borough of Croydon

planning application no. 11/00317/P

Strategic planning application stage 1 referral (new powers)

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

The proposal

Regeneration of the public park to include de-culverting of the River Wandle, conversion of an existing changing room building into a public cafe, public toilets, changing rooms and ranger station, erection of an all-weather ball court, construction of a concrete wheel/skate park to replace the existing facility, erection of replacement bandstand, and various other landscaping works.

The applicant

The applicant is **Croydon Council**, and the architect is **Geraghty Taylor**.

Strategic issues

The principle of the development is supported, and the redevelopment of the sports pavilion is acceptable in terms of strategic planning policy. However, further work and discussion is required on **accessibility**, to address outstanding concerns.

Recommendation

That Croydon Council be advised that, while the application is generally acceptable in strategic planning terms, the application does not comply with the London Plan for the reasons set out in paragraph 54 of this report; but that the possible remedies set out in paragraph 56 of this report could address these deficiencies. The application does not need to be referred back to the Mayor if Croydon Council resolve to refuse permission, but it must be referred back if Croydon Council resolve to grant permission.

Context

1 On 18 February 2011 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 31 March 2011 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 3C(a) of the Schedule to the Order 2008: *“Development which is likely to prejudice the use as a playing field of more than two hectares of land which is used as a playing field at the time of the relevant application for planning permission is made”*.

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 Croydon 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 Wandle Park is located just west of Croydon metropolitan town centre, in the heart of the borough. The ‘D’ shaped park comprises 8.5 hectares, and has four entrances off Theobald Road, Westfield Road, Waddon New Road and Vicarage Road.

6 The park hosts various sports and play facilities including space for three full sized adult football pitches, a (disused) bowling green, a children’s play area, and a skate park. Existing built structures at the site comprise a changing room block and a shelter in the rose garden.

7 The topography of the park is generally flat, and the River Wandle runs east to west across the park in an underground culvert. Tramlink runs along the south and west boundary of the park.

Details of the proposal

8 The scheme proposes to restore a number of Wandle Park’s historically significant assets, while enhancing the site’s accessibility, biodiversity and opportunities for sports, leisure and recreation.

9 Specific proposals include:

- Refurbishment and redevelopment of the existing changing room block to provide a pavilion containing a public cafe, public toilets, changing rooms and park ranger station (within existing built footprint);
- Provision of an all-weather multi use games area;
- Space for one full sized football pitch, two junior football pitches, and one cricket square;
- Provision of an improved skate park and bandstand;
- De-culverting of the River Wandle;
- Landscaping works and creation of an ornamental pond.

Case history

10 There is no relevant strategic case history.

Strategic planning issues and relevant policies and guidance

11 The relevant issues and corresponding policies are as follows:

- Open land *London Plan; PPG17; draft PPS Planning for a Natural and Healthy Environment; East London Green Grid network SPG*
- Blue ribbon network *London Plan; Mayor's draft Water Strategy; PPS25, RPG3B*
- Playing fields *London Plan; PPG17, draft PPS Planning for a Natural and Healthy Environment*
- Urban design *London Plan; PPS1*
- Access *London Plan; PPS1; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM)*
- Biodiversity *London Plan; the Mayor's Biodiversity Strategy; PPS9; draft PPS Planning for a Natural and Healthy Environment*
- Sustainable development *London Plan; PPS1, PPS1 supplement; PPS3; PPG13; PPS22; draft PPS Planning for a Low Carbon Future in a Changing Climate; the Mayor's Energy Strategy; Mayor's draft Climate Change Mitigation and Adaptation Strategies; Mayor's draft Water Strategy; Sustainable Design and Construction SPG*
- Transport and parking *London Plan; the Mayor's Transport Strategy; PPG13*

12 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the 2006 Croydon Unitary Development Plan saved policies and the London Plan (Consolidated with Alterations since 2004).

13 The following are also relevant material considerations:

- The draft replacement London Plan, published in October 2009 for consultation.
- The Croydon Core Strategy (preferred options stage).

Principle of development

14 The GLA is working with Councils and other partners to develop and implement the concept of a regional park running from the Thames through the boroughs of Wandsworth, Merton, Sutton and Croydon. The Wandle Valley is identified as a Regeneration Corridor in the London Plan and the identified regional park opportunity will assist in the redevelopment of the area, contributing to improving the quality of the environment and as a place to work, live and visit. While the focus of the park is along the river corridor and the adjacent open space network, it will also spread out to town centres, business areas and residential areas through green links. This network of green infrastructure is supported by policy 3D.8 in the London Plan, and policy 2.18 in the draft replacement London Plan.

Open space

15 The application site is designated as open space. The agents acting on behalf of the Council have incorrectly identified this site as Metropolitan Open Land. Nevertheless, the site is still afforded protection at both the local and strategic level as open space. London Plan Policy 3D.8 states that "*The Mayor will work with strategic partners to protect and promote London's network of open spaces, to realise the current and potential value of open space to communities and to protect the many benefits of open space...*".

16 The existing changing room block at the park comprises 135 sq.m. Proposals for its refurbishment to provide a sports pavilion include converting approximately 29 sq.m. of this floorspace to cafe use. The remainder would be reconfigured to provide changing facilities, an improved park ranger office, and a set of public toilets. A cafe terrace is proposed to provide an additional outdoor seating area, but the external footprint of the building will remain 135 sq.m. in size. Given that the proposals maintain the built footprint and envelope of the existing building, the refurbished building would have no additional impact on the open space. Indeed, the proposed refurbishment of this building would be likely to enhance the use and setting of this important area of green space, and provide important facilities for outdoor spots, positively contributing to the park in terms of its use and attractiveness for sport and recreation. The proposal is, therefore, supported in line with London Plan policy 3D.8.

Blue ribbon network

17 Policy 4C.3 of the London Plan, and Policy 7.28 of the draft replacement London Plan, seek to protect and enhance the value of London's water bodies as a valuable asset for biodiversity. These policies specifically promote the opening of culverts in order to help naturalise river channels. Policy 4C.11 of the London Plan seeks to increase public access to the blue ribbon network. Emerging policy 7.27 in the draft replacement London Plan reinforces this approach, and promotes the use of London's water bodies for leisure and recreation as an important objective.

18 The intention to de-culvert the River Wandle and provide an ornamental pond as part of the proposed regeneration project would offer enhancements to the biodiversity of the park, enable access to the river where there is currently none, and provide various opportunities for informal recreation. On this basis, the scheme is supported in accordance with London Plan policies 4C.3 and 4C.11, emerging draft replacement London Plan policies 7.28 and 7.27, and the London Rivers Action Plan.

Playing fields

19 Policy 3D.8 of the London Plan seeks to protect the many benefits of open space, including those associated with health, sport and recreation. Emerging policy in the draft replacement London Plan builds on this principle, and Policy 3.20 seeks to support proposals that increase or enhance the provision of sports and recreation facilities, while resisting any net loss of such facilities or playing fields.

20 The proposed scheme would reconfigure the existing playing field provision at the park, resulting in the conversion of the disused bowling green to an all-weather multi-use games area, enhancement of the existing skate park, provision of one new cricket square, the addition of two junior football pitches, and a reduction in the number of full sized football pitches from three to one.

21 These proposals result in the net loss of one full sized football pitch in terms of playing field area. The net reduction occurs primarily as a result of the reinstated river channel, which follows its historic course, through the centre of the park. The applicant has chosen to provide two new junior football pitches, rather than retaining two of the full sized pitches, based on a local need for junior sized pitches. Evidence submitted in support of this approach indicates there are four junior sized football pitches, and 23 full sized football pitches, within a three kilometre radius of the site.

22 While emerging policy 3.20 in the draft replacement London Plan would seek to resist any loss of sports pitches, the high proportion of full sized football pitches in the wider vicinity of the

park, coupled with the various other sporting and recreational benefits of the scheme, and the biodiversity enhancements associated with the opening up the river, mitigate any loss.

23 The Council consulted Sport England on the application, but at the time of writing this report a formal response is still to be issued.

Summary

24 On balance, the proposed development would provide essential facilities for outdoor sport and recreation, restore access to the River Wandle at the site, and greatly improve the biodiversity of the park. The net loss of one full sized football pitch is accepted on the basis of these wider benefits, and the principle of the development is, therefore, supported in line with the London Plan.

Urban design

25 Good design is central to all objectives of the London Plan and is specifically promoted by the policies contained within Chapter 4B which address both general design principles and specific design issues. London Plan Policy 4B.1 sets out a series of overarching design principles for development in London. Other policies in Chapter 4B and elsewhere in the London Plan set out design requirements relating to specific issues. The draft replacement London Plan reinforces these principles within Chapter 7, with new development required to have regard to its context, and reinforce or enhance the character, legibility, and permeability of the neighbourhood.

26 The applicant's aspiration to recapture a sense of the park's historic character, while providing modern high quality sporting and recreational facilities, is welcomed. The proposed reinstatement of historic elements including the bandstand, northern promenade walk, pond, and River Wandle is supported, as is the proposed approach to landscaping.

27 The applicant is proposing to refurbish and redevelop the existing single storey changing room block to provide a cafe and sports pavilion. Given that these proposals would be provided within the built footprint and envelope of the existing changing room block, they would not adversely impact on the open space. The principle of utilising existing building stock, while introducing enhancements in energy efficiency, represents a sustainable approach to providing these new facilities, and is supported in line with London Plan policy 4B.4 and draft replacement London Plan policy 5.4.

28 The proposed building design is simplistic and functional, and represents a good response to providing the desired facilities, given the constraints of the existing structure. The introduction of increased glazing at the cafe frontage is welcomed as a means of 'opening up' the building to the public, and maximising the use of natural lighting. The proposed palette of materials and colours indicated within the architect's report are broadly supported, and would help to ensure the building blends into the surroundings.

29 The applicant is also proposing to reinstate a bandstand in the park, modelled on historic drawings, and intended to recapture a sense of the Victorian character of the park. The bandstand would act as a focal point of interest at the southern end of the park, interacting with the reinstated historic path structure, fountain, and ornamental lake. The open nature of the structure ensures the bandstand would not adversely impact of the open space, and the proposal is supported.

Inclusive access

30 Inclusive design principles if embedded into the development and design process from the outset help to ensure that all of us, including older people, disabled and deaf people, children and young people, can use the places and spaces proposed comfortably, safely and with dignity. The aim of London Plan Policy 4B.5 is to ensure that proposals achieve the highest standards of accessibility and inclusion, not just the minimum.

Public realm and connectivity

31 The design of the landscaping and the public realm is crucial to how inclusive the rejuvenated park will be. Pedestrian routes to each of the different elements of the park should be designed to ensure full and easy access for all users. The applicant's commitment to use smooth, sealed paths, and gentle gradients throughout, would help to ensure disabled people are able to move inclusively around the park. This is welcomed. The GLA also supports the applicant's intention to increase the provision of seating along these routes, and would encourage the applicant to provide a variety of seating types (e.g. with / without armrests) to suit the differing requirements of park users.

32 Connectivity to the surrounding streets, and public transport network, is also a key access consideration for this site. The proximity of the Wandle Park Tramlink station, at Vicarage Road, ensures the park has good public transport accessibility. However, the presence of the tram lines themselves, which run along the southern and western perimeter of the site, present significant challenges for inclusive access into the park from these areas. Indeed, the existing access from Wadden New Road, by footbridge between tram lines and rail lines, is poorly resolved, and entirely inaccessible to wheelchair users. It is understood that the Council has had discussions with Tramlink to try to resolve this issue, and it should be noted that the GLA would strongly support a solution which results in an accessible form of park access from this point. To this end, the applicant is strongly encouraged to examine possibilities for facilitating inclusive access at this entrance.

33 Notwithstanding this, the applicant is facilitating an additional access route into the park from the west. This would connect with the adjacent New South Quarter residential development, and would provide pedestrian access to the park all the way through from Purley Way. The introduction of this new pedestrian route is strongly supported. The applicant is, however, advised to ensure access over the tram lines for this new entrance, as well as for the existing Vicarage Road entrance, is level, with adequate visual and audio warnings provided as necessary, to ensure pedestrian safety when crossing the lines.

Built components

34 GLA officers are pleased to note that the proposed redevelopment of the sports pavilion includes the external provision of an accessible W.C. for spectators, and other visitors to the park. It is, however, disappointing that the sports facilities within the pavilion do not appear to feature accessible changing & showering areas, or a wheelchair accessible W.C. Given that the proposals for the park include the provision of a hard surfaced multi use games area, there is considerable scope for the park to host various wheelchair sports. On this basis, the GLA is particularly keen that fully accessible changing facilities are provided within the pavilion in line with the principles of London Plan policy 4B.5.

35 Sport England has provided guidance on the suitable provision of accessible changing facilities for multi use games areas within their *Accessible Sports Facilities Design Guidance Note*

2010. The guidance states that, as a minimum requirement, one unisex changing room and W.C. should be provided. The applicant is advised to review this guidance.

36 While it is recognised that changing room floorspace is constrained, both by the envelope of the existing building, and the surrounding open space designation, the applicant should investigate options for providing these facilities. The architect is advised to examine whether the internal layout of the pavilion could, perhaps, be reconfigured to incorporate an accessible toilet and shower area within each, or at least some, of the proposed changing areas. This would provide a flexible use of space, and would ensure that the changing rooms could be used equally by both able and disabled persons.

37 As previously discussed, the applicant is also proposing to reinstate a bandstand in the park, based on a historic structural model. It is noted that the example provided in support of this proposal features stepped entry to the stage area. The applicant is requested to revise the design of this to ensure the structure is fully inclusive. The architect may wish to use semi-circular ramped access, or landscaping techniques, to provide a level threshold point along the circumference of the structure.

Blue badge parking

38 With regard to car parking at the site, the applicant is proposing to retain the existing provision of 20 spaces (of which two are reserved for disabled users). This 10% blue badge space provision is welcomed in line with London Plan policy 3C.23, and emerging draft replacement London Plan policy 6.13. The applicant should, however, monitor and review demand for blue badge spaces, following the comprehensive improvements to the park, to ensure this level remains adequate. Further to this, the applicant should ensure blue badge spaces are provided as close as possible to the main orbital park pathway, within easy reach of the sports pavilion and cafe.

Flooding

39 The applicant has provided a flood risk assessment in order to facilitate assessment of the flood risks associated with the development, and the de-culverting of the River Wandle.

40 The assessment demonstrates that the majority of the site lies within Environment Agency flood zone '3a', while the southern and south west corners of the Park are located in flood zone '1'. While there is a comparatively high probability of flooding at this site, the vulnerability classification of the proposed land use is determined as less vulnerable. The proposed development is defined as water compatible, and, as such, an exception test is not required. The flood risk report concludes that the proposed de-culverting of the River Wandle through the site would not increase flood risk. On this basis, the proposed scheme is acceptable in terms of flood risk.

Biodiversity

41 Policy 3D.14 in the London Plan, and emerging policy 7.19 in the draft replacement London Plan seek to ensure new development contributes towards nature conservation, and provides opportunities to achieve positive gains for biodiversity.

42 The proposed opening up of the River Wandle channel, coupled with the provision of the pond, would provide a range of new wetland habitats at the park. These proposals are, therefore, strongly supported.

43 The applicant is proposing to exploit the material released as a result of these works to create hillocks along the new river channel. This will generate visual interest on this otherwise flat

site, but will also provide an opportunity to improve biodiversity through the creation of south facing slopes. The applicant is proposing to utilise the slopes to introduce new opportunities for different wildflower meadows. This proposal would result in biodiversity gains for the site and is supported.

44 The applicant is also proposing a relaxation of the mowing regime in certain parts of the park to create areas hospitable to insect species, as well as coppice management, and enhancement of the ground flora, on western tree belt at the site. This is welcomed.

Sustainable development

45 The London Plan climate change policies set out in Chapter 4A collectively require developments to make the fullest contribution to the mitigation of, and adaptation to, climate change, and to minimise carbon dioxide emissions. London Plan Policy 4A.1 sets out an energy hierarchy for assessing applications, London Plan Policy 4A.3 ensures future developments meet the highest standards of sustainable design and construction, and London Plan Policy 4A.9 promotes and supports the most effective adaptation to climate change. Further detailed policies on climate change mitigation and adaptation are found throughout Chapter 4A and supplementary guidance is also given in the London Plan Sustainable Design and Construction SPG. Chapter 5 of the draft replacement London Plan sets out the approach to climate change and requires developments to make the fullest contribution to minimising carbon dioxide emissions.

Climate change mitigation

46 The applicant is committed to improving the energy efficiency of the pavilion building through increased insulation levels and improved controls. Photovoltaic panels are also proposed to be fitted to the roof of the building.

47 Given the very small scale of the built development, constraints associated with refurbishment of this existing structure, and the provision of energy efficiency measures and photovoltaics, there are no strategic energy concerns associated with the proposal.

Climate change adaptation

48 The applicant is proposing a number of passive design measures, including introduction of increased glazing to reduce the need for artificial lighting within the pavilion. This is welcomed. Where lighting is required, the applicant has indicated a commitment to use PIR sensors, and high efficiency bulbs, to minimise the carbon dioxide emissions of the proposed development. Given the intended use of the pavilion, it is anticipated that demand for hot water is likely to be the biggest energy use within the building. The applicant is, therefore, advised to ensure 'low flow' fittings are used, to ensure hot water demand is managed efficiently.

49 A green roof is also proposed, in addition to the photovoltaic array. This is welcomed as an additional enhancement of biodiversity opportunities at the site, and will also provide further benefits for rainwater retention, and mitigation of the urban heat island effect.

Transport

50 Given the nature of the proposals, Transport for London is satisfied that there are no strategic transport implications arising from this application. Notwithstanding this, given the site's location, TfL would request that before diverting any pedestrian paths or undertaking any enabling works or construction activities near the tram lines, the construction programme and route

diversions should be discussed with Tramlink's third party works coordinator. It is recommended that the Council secure this requirement by planning condition.

Local planning authority's position

51 The view of the local planning authority is not known at the time of writing of this report.

Legal considerations

52 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

53 There are no financial considerations at this stage.

Conclusion

54 London Plan policies on metropolitan open land, playing fields, blue ribbon network, urban design, access and inclusion, biodiversity, sustainable development, and transport are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:

- **Open space:** The proposal would positively contribute to the park in terms of its use and attractiveness for sport and recreation, and does not adversely impact on the open space. The proposal is, therefore, supported in line with London Plan policy 3D.10, and draft replacement London Plan policy 7.17.
- **Playing fields:** The net loss of one full sized football pitch is accepted on the basis of the wider sporting, and other benefits of the development. The scheme is, therefore, acceptable in line with the London Plan policy 3D.8, and draft replacement London Plan policy 3.20.
- **Blue ribbon network:** The proposed de-culverting of the River Wandle is acceptable in terms of flood risk, and would offer enhancements to the biodiversity of the park, enable access to the river where there is currently none, and provide various opportunities for informal recreation. The proposal is, therefore, supported in accordance with London Plan policies 4C.3 and 4C.11, emerging draft replacement London Plan policies 7.28 and 7.27.
- **Urban design:** The applicant's intention to restore a number of Wandle Park's historically significant assets, while updating the site's sporting facilities is welcomed, and the proposed response to refurbishing the existing changing room block to provide a cafe and sports pavilion is supported in line with London Plan policy 4B.4 and draft replacement London Plan policy 5.4.
- **Access and inclusion:** While the overall approach to landscaping and public realm within the park is supported, further work is required to investigate the potential for wheelchair

access at the Wadden New Road entrance, and to ensure the sports pavilion and bandstand meet the highest standards of access and inclusion in line with London Plan policy 4B.5.

- **Biodiversity:** The proposed opening up of the River Wandle and provision of associated wild flower meadows would deliver significant biodiversity gains for the site. This, coupled with the proposed management measures, is supported in line with London Plan policy 3D.14.
- **Sustainable development:** The proposals are acceptable in line with London Plan energy and climate change policies.
- **Transport:** The proposals are acceptable in line with London Plan transport policies.

55 Whilst the application is broadly acceptable in strategic planning terms, on balance, the application does not comply with the London Plan.

56 The following changes might, however, remedy the above-mentioned deficiencies, and could possibly lead to the application becoming compliant with the London Plan:

- **Access and inclusion:** The applicant should investigate options for providing one accessible unisex changing room and W.C. within the sports pavilion, and make appropriate provision for these facilities where possible. The applicant should also seek to ensure the proposed bandstand would be accessible to wheelchair users, and investigate whether wheelchair access could be provided into the park from the Wadden New Road entrance.

for further information, contact Planning Decisions Unit:

Colin Wilson, Senior Manager – Planning Decisions

020 7983 4783 email colin.wilson@london.gov.uk

Justin Carr, Strategic Planning Manager (Development Decisions)

020 7983 4895 email justin.carr@london.gov.uk

Graham Clements, Case Officer

020 7983 4265 email graham.clements@london.gov.uk
