

## **LION GREEN ROAD CAR PARK, Croydon planning application 13/02178/P**

### **'Fair and transparent'**

CRA has been advised by Clive Newberry QC of Francis Taylor Building, Inner Temple, that LBC as owner of the Lion Green Car Park and 50% beneficiary of its proposed development "should be sensitive and they should act in a transparent and fair way" in relation to this application. We believe this test to have been failed already in relation to the LBC decision in December 2012 that no EIA is required.

We also believe that particular care is required when LBC assesses the application as submitted, since it is deficient in key aspects.

### **Environmental impact assessment**

CRA believes that an EIA is required for this site, under Schedule 2 of Circular 02/99 when taken with the Town & Country Planning (Environmental Impact Assessment) Regulations 2011 as it is a major development of more than local importance. The Traffic Assessment now submitted takes the substantial supermarket as drawing custom from a 15-minute drive radius, thus making it of more than local importance. This drive radius is common for stores of this size, and LBC should both have been aware of this and acted accordingly by requiring an EIA.

### **Highways impact**

CRA notes that Surrey Highways placed repeated caveats on its assessment of the application, such as asking LBC to consider whether it is premature in the light of the emerging Coulsdon Masterplan, branding as "unfortunate" the lack of a comprehensive TA covering all of the Masterplan area, and being "disappointed" that the proposal was submitted in isolation using a "piecemeal approach." Tellingly, Surrey specifically notes it does not endorse the figures used in the TA, branding them as heavily discounted.

Taken together, these problems with the TA are in accord with the fuller analysis carried out by The Stilwell Partnership (TSP) on behalf of CRA and submitted separately. It is only by assessing the application in isolation – and clearly against its preferred approach – as well as using the discounted TA figures that the County Highways Authority finds the impact to be "acceptable."

CRA contends that on Surrey Highways' grounds alone the TA fails the "transparent and fair" test, even before consideration is given to the fuller assessment from TSP.

Of importance is the clear incompatibility between the 2011 report on the Lion Green-Chipstead Valley Road junction commissioned by LBC from Mott MacDonald and the submitted TA from WSP. The opinion of TSP which - unlike WSP - accessed the Mott MacDonald report is unequivocal and set out clearly in its detailed analysis.

CRA further notes that WSP's surveys, which have little purpose unless used to inform the traffic modelling, did not start until after the site proposals had been drafted and subjected to public consultation on 12-14 April 2013. This cannot be "transparent and fair."

### **Parking**

Residents from Chipstead, along with other areas, are rightly concerned that it is proposed to remove all long-term parking from the application site and that LBC is proposing no replacement. There has been a slight increase in spaces at Coulsdon South station, but allied with removal of the commuter parking at the front of the station this amounts to a severe and unwelcome reduction for commuters.

### **Travel plan**

No travel plan has been published. This should be a requirement as part of the application.

**Resubmission**

CRA urges the applicant to withdraw, reassess in the light of an approved Coulsdon Masterplan and the information now available to it, then re-submit as part of a comprehensive overview of this and the inter-linked applications for the Red Lion and Cane Hill sites.

Failing that, LBC should refuse the application.

**Richard Wagner, Chairman, Chipstead Residents' Association**

Tuesday 13 August 2013