

For General Release

REPORT TO:	CABINET 17 November 2014
AGENDA ITEM:	9
SUBJECT:	Old Town Masterplan Supplementary Planning Document (SPD) and Central Croydon, Church Street and Croydon Minster (formerly Parish Church) Conservation Area Appraisals and Management Plan Supplementary Planning Documents adoption
LEAD OFFICERS:	Jo Negrini, Executive Director Development and Environment and Mike Kiely, Director of Planning
CABINET MEMBER:	Councillor Alison Butler, Cabinet Member for Homes and Regeneration
WARDS:	Fairfield, Broad Green and Waddon
<p>CORPORATE PRIORITY/POLICY CONTEXT:</p> <p>It is a corporate priority to produce and adopt a Masterplan for Old Town.</p> <p>The production of the Old Town Masterplan is in accordance with the following goals set out in Croydon’s Community Strategy 2013-2018:</p> <p>Goal One: A better borough: Croydon is a great place to learn, work and live Goal Two: Protect vulnerable people: Local agencies understand the needs of people and involve them in shaping and delivering better outcomes Goal Three: Take responsibility: People help themselves, family, neighbours and communities</p> <p>In relation to conservation areas, the Council, as a Local Planning Authority, has the following statutory duties which the production of the Conservation Area Appraisals and Management Plans enables Croydon Council to fulfil:</p> <ul style="list-style-type: none"> • From time to time to formulate and publish proposals for the preservation and enhancement of any parts of their area which are conservation areas. • In the exercise of planning functions special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area. 	
<p>AMBITIOUS FOR CROYDON & WHY ARE WE DOING THIS:</p> <p>Old Town is a characterful area of Croydon Metropolitan Centre that includes many historic buildings of significance and the historic street market of Surrey Street. However, in the past, the area’s heritage assets have often been overlooked and Old Town is not yet reaching its full potential as a cultural destination. The Old Town Masterplan Supplementary Planning Document and Conservation Area Appraisals and Management Plan Supplementary Planning Documents for the Central Croydon, Church Street and Croydon Minster conservation areas, provide</p>	

site specific planning guidance for future development in Old Town. This guidance will help enable and ensure that future development in the area is of a high quality design and sensitive to the area's heritage assets and that the historic environment of Old Town is preserved and enhanced to enrich the quality of life for residents and visitors to Croydon.

FINANCIAL IMPACT

The production of the Old Town Masterplan SPD and Conservation Area Appraisals and Management Plan SPDs for the three Conservation Areas that lie within Old Town - Central Croydon, Church Street and Croydon Minster (formerly Parish Church) - is being funded by the Mayor of London's Regeneration Fund (£250,000) and Section 106 Funding (£50,000). There is sufficient budget allocated to undertake the adoption of the SPDs.

KEY DECISION REFERENCE NO:

This is not a key executive decision. As part of the core policy framework it is reserved to Council for decision.

1. RECOMMENDATIONS

The Cabinet is asked to consider the representations received to the consultation and the Council's response as detailed in paragraphs 4 and appendix 7 and recommend the Council to:

- 1.1 Adopt the draft Old Town Masterplan Supplementary Planning Document (Appendix 1);
- 1.2 Endorse the Old Town Masterplan Supplementary Planning Document (SPD) Sustainability Appraisal (Appendix 2).
- 1.3 Adopt the draft Central Croydon Conservation Area Appraisal and Management Plan (CAAMP) Supplementary Planning Document. (Appendix 3);
- 1.4 Adopt the draft Church Street Conservation Area Appraisal and Management Plan (CAAMP) Supplementary Planning Document (Appendix 4);
- 1.5 Adopt the draft Croydon Minster (formerly Parish Church) Conservation Area Appraisal and Management Plan (CAAMP) Supplementary Planning Document (Appendix 5).
- 1.6 Agree that after the adoption of the Old Town Masterplan Supplementary Planning Document the Director of Planning, in consultation with the Cabinet Member for Homes and Regeneration, be given delegated authority to make minor factual amendments to the adopted Old Town Masterplan Supplementary Planning Document and the Old Town Masterplan SPD Sustainability Appraisal subsequent to adoption but prior to publication of the documents.
- 1.7 Agree that after the adoption of the Old Town Masterplan Supplementary Planning Document, the Central Croydon CAAMP Supplementary Planning Document, the Church Street CAAMP Supplementary Planning Document and the Croydon Minster (formerly Parish Church) CAAMP Supplementary Planning Document, the Director of Planning, in consultation with the Cabinet Member for Homes and Regeneration be given delegated authority to make minor factual amendments to the adopted Central Croydon CAAMP Supplementary Planning Document, the Church Street CAAMP Supplementary Planning Document and the Croydon Minster (formerly Parish

Church) CAAMP Supplementary Planning Document subsequent to adoption but prior to publication of the documents.

The Cabinet is recommended to:

- 1.8 Note that the Council has undertaken a screening exercise with the statutory bodies to confirm the Conservation Area Appraisal and Management Plans (CAAMP) Supplementary Planning Documents are not required to be supported by a Sustainability Appraisal and Strategic Environmental Assessment.

2.0 EXECUTIVE SUMMARY

- 2.1 Croydon Council has produced a draft Old Town Masterplan Supplementary Planning Document (SPD) and three draft Conservation Area Appraisals and Management Plan (CAAMP) SPDs for the Central Croydon, Church Street and Croydon Minster (formerly Parish Church) conservation areas that lie within Old Town.
- 2.2 "Old Town" is the historic but informal name given to the area in Croydon town centre where the first settlements in Croydon were located in Saxon times, close to the source of the River Wandle. It contains several iconic heritage assets - including three conservation areas, Croydon Minster, The Surrey Street Pumping Station, Surrey Street Market, and Old Palace School which was the former summer residence of the Archbishop of Canterbury for over 500 years from around the 10th century.
- 2.3 The Boundaries of the Old Town Masterplan study area and the three conservation areas that lie within it are shown on the plan below.
- 2.4 The draft Old Town Masterplan SPD outlines the Council's strategic aspirations and site specific guidance for the built environment of the Old Town Masterplan study area. It describes the area's existing strengths and weaknesses and sets out how it should and could be improved for residents, workers, shoppers and visitors as public and private investment becomes available.
- 2.5 The draft Conservation Area Appraisals and Management Plans SPDs appraise the special character of the built environment of the conservation areas in more detail than the draft Old Town Masterplan and describe how it should be protected and enhanced.
- 2.6 The production of the draft CAAMP SPDs for the Central Croydon, Church Street and Croydon Minster (formerly Parish Church) conservation areas that lie within Old Town has been scheduled to coincide with the production of the Old Town Masterplan SPD because of the synergy that exists between the two projects.
- 2.7 The availability of evidence based and clear guidance for development in the Old Town Areas will help ensure that future development in the area is of a high quality design and sensitive to the area's heritage assets.

- 2.8 The existence of the adopted Old Town Masterplan will also increase the likelihood of securing public investment in the area, because the business case for it is provided in the masterplan.
- 2.9 For the avoidance of doubt, upon adoption of the draft Old Town Masterplan and draft CAAMP SPDs for the Central Croydon, Church Street and Croydon Minster (formerly Parish Church) conservation areas, references to the documents being draft will be removed from the documents.
- 2.10 The Old Town Masterplan Supplementary Planning Document is produced supplementary to the Croydon Local Plan: Strategic Policies (April 2013).
- 2.11 Cabinet granted approval to consult on the draft SPDs on 20 January 2014 and consultation on the draft documents took place over a six week period between 10 February and 24 March 2014. The minute reference is A11/14.
- 2.12 It is intended that the Old Town Masterplan will be recommended for adoption at Full Council 1 December 2014.

3.0 DETAIL

3.1.1 OLD TOWN MASTERPLAN

- 3.1.1 The masterplan has been produced by a multi-disciplinary team led by Allies and Morrison Urban Practitioners working with the Croydon Council Spatial Planning Service.

Remit

- 3.1.2 The draft Old Town Masterplan SPD promotes heritage-led regeneration and describes how the heritage assets of Old Town and their setting should be preserved, enhanced and celebrated to contribute towards quality of life; raise the profile of Croydon's, currently often hidden, heritage; and strengthen the distinct identity of Croydon's Old Town.
- 3.1.3 The draft Old Town Masterplan SPD sets guidance for high quality development and also enhancement of the public realm - streets and public spaces - in Old Town. In addition it describes how movement in, out and through the area could be improved, with a focus on upgrading pedestrian and cycling routes.
- 3.1.4 The analysis of the conservation areas in Old Town within the draft CAAMPs SPD has informed the draft Old Town Masterplan.
- 3.1.5 The recommended proposals in the draft Old Town Masterplan are prioritised and phased according to the regeneration benefit they could bring and their financial viability.

- 3.1.6 The draft Old Town Masterplan defines the role Old Town will play in the wider area of Croydon Town Centre and the Croydon Opportunity Area, where at least 7,300 new homes are planned over the next 20 years; and the existing Whitgift retail centre is poised to be renewed and expanded.
- 3.1.7 The boundary for the Old Town Masterplan study area covers the central area of what is informally known as Old Town, where the key heritage assets are located and there is the most opportunity to improve the built environment.

The Masterplan presents flexible guidance for development in Old Town. It sets parameters to achieve a high standard of design but it is not overly prescriptive. This is to allow for a variety of design solutions to come forward and with the acknowledgement that the future economic and development context of the area will affect feasibility.

As a Supplementary Planning Document the Old Town Masterplan cannot allocate sites for a change of use. This will occur in the Croydon Local Plan: Detailed Policies and Proposals Development Plan Document which is due to be consulted on in April 2015.

3.2 Funding and Procurement

- 3.2.1 The budget for the Old Town Masterplan commission is £300,000. £250,000 funding comes from the Mayor's Regeneration Fund and £50,000 funding is Section 106 funding.
- 3.2.2 At the Cabinet meeting held on Monday 9 July 2012 the confirmed GLA funding approvals under the Mayor's Regeneration Fund were noted. The minute reference is A76/12.

3.3 Legal Compliance

- 3.3.3 The draft Old Town Masterplan and the process of its production conforms to national, London and local planning policy and relevant legislation.
- 3.3.4 The draft Old Town Masterplan has been produced subsequent to the adoption of the Croydon Local Plan: Strategic Policies that occurred in April 2013. It will be therefore adopted as a Supplementary Planning Document.
- 3.3.5 The draft Old Town Masterplan SPD requires a Strategic Environmental Assessment and Sustainability Appraisal (Sustainability Appraisal) which has been consulted on in conjunction with the SPD following the production of a scoping report. The draft Old Town Masterplan SPD Sustainability Appraisal is appended to this report (Appendix 2).
- 3.3.6 The draft Old Town Masterplan conforms with and is consistent with the Croydon Local Plan: Strategic Policies 2013, London Plan 2011 and the

Croydon Opportunity Area Planning Framework SPD 2013.

- 3.3.7 The Old Town Masterplan Supplementary Planning Document (SPD) is produced supplementary to the Croydon Local Plan: Strategic Policies (April 2013).

3.4 Other Deliverables of the Old Town Masterplan Commission

- 3.3.8 Estimated costings for the public realm components of the Masterplan and some key development sites will be produced as a separate document to the Old Town Masterplan. These estimated costings are not to be published due to their commercial sensitivity.
- 3.3.9 The Old Town Masterplan commission also includes the development of three public realm projects to RIBA Stage C (2012 standards). These schemes are due to be completed by March 2015 and will not form part of the Old Town Masterplan SPD.

Related Projects

- 3.3.10 The Old Town High Streets Improvement Project will deliver improvements to the streets and shop fronts in Old Town during 2015. The Old Town Masterplan project objectives are closely aligned with the High Streets Improvement Project outputs to ensure a coordinated approach.
- 3.3.11 As a result of the work done to assess the historic environment several buildings it was recommended that several additions and one removal were made to the Local List of Buildings of Architectural or Historic Interest SPD (2006). These recommendations were agreed at The Council meeting 6 October 2014. The properties that were added are 47 Tamworth Road, 11 Surrey Street ,109 and 109A Church Street.12 Surrey Street was removed.

3.4 CONSERVATION AREA APPRAISALS AND MANAGEMENT PLANS

- 3.4.1 Croydon Council is in the process of producing and updating Conservation Area Appraisals and Management Plans (**CAAMPs**) for each of its 21 Conservation Areas.
- 3.4.2 A conservation area is an area of special architectural or historic interest, the character and appearance of which it is desirable to preserve or enhance. Conservation areas are 'designated heritage assets', of national historic or architectural significance. Conservation areas are also subject to national planning policies under the National Planning Policy Framework (NPPF).
- 3.4.3 National Planning Policy, The London Plan and Local Planning Policy requires Local Authorities to preserve and enhance conservation areas through the identification of the special character of each conservation area and stating how these characteristics can be managed through the retention, development and

maintenance of the built environment within conservation areas. English Heritage recommends that every conservation area has its own CAAMP.

3.4.4 At the Council meeting of 22 April 2013 Croydon Council adopted the Conservation Area General Guidance SPD which provides guidance that applies to all of Croydon's conservation areas so it does not require repeating in the CAAMPs. The CAAMPs should be read in conjunction with the Conservation Area General Guidance SPD.

3.4.5 Guidance from English Heritage states key elements in defining the special character of conservation areas are likely to be:

- The relationship of the conservation area to its setting and the effect of that setting on the area
- The still-visible effects/impact of the area's historic development on its plan form, character and architectural style and social/historic associations
- How the places within it are experienced by the people who live and work there and visitors to the area (including both daily and seasonal variations if possible)
- Architectural quality and built form
- Open spaces, green areas, parks and gardens, and trees
- Designated and other heritage assets, their intrinsic importance and the contribution they make to the area
- Local distinctiveness and the sense of place which make the area unique

3.4.6 The key anticipated benefits of the use of the CAAMPs by applicants, planning officers and residents are as follows:

- As material planning considerations when determining planning applications within conservation areas CAAMPs are likely to lead to an increase in the quality of the design of development within conservation areas that preserve and enhance their special character. The CAAMPs will inform applicants of the various aspects of the built environment of conservation areas that make up their special character and will provide clear guidance about what types of development would be considered acceptable within them;
- An increase in the efficiency of the planning application process for sites within conservation areas through reference to clear and concise information;
- An increased sense of pride amongst residents of conservation areas as a result of raising knowledge and awareness of the value of their local area through the consultation process;

3.4.7 If the draft CAAMPs are adopted the Council may consider the serving of Article 4 Directions for some properties whose special character is at risk from the exercising of permitted development. An Article 4 Direction is a direction which withdraws automatic planning permission granted by the General Permitted Development Order.

3.5 Legal and Policy justification

- 3.5.1 Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (“the Act”) imposes a duty on Local Authorities to have special regard for the preservation or enhancement of conservation areas. Sections 66 and 73 of the Act require Local Authorities to have special regard to conservation areas when making planning decisions. This requirement is reinforced in the London Plan, the Croydon Local Plan: Strategic Policies and the Saved Policies of the Croydon Replacement Unitary Development Plan.
- 3.5.2 If cabinet recommends and Full council decide to adopt the draft CAAMPs, they will be adopted as SPDs to give them weight as material planning considerations when determining planning applications. The Council has undertaken a screening exercise with the statutory bodies (Environment Agency, Natural England and English Heritage) to confirm the Conservation Area Appraisal and Management Plans (CAAMP) Supplementary Planning Documents are not required to be supported by a Strategic Environmental Assessment as defined by the Environmental Assessment of Plans and Programmes Regulations 2004.
- 3.5.3 On adoption, The Parish Church Conservation Area and the Parish Church Conservation Area Appraisal and Management Plan Supplementary Planning Document will be renamed the Minster Conservation Area and the Minster Conservation Area Appraisal and Management Plan Supplementary Planning Document respectively. This is considered to fall beyond the scope of Section 70 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

3.6 Content of CAAMPs

The Appraisal of the draft CAAMPs have chapters covering Context, Townscape Character, Streetscape Character, Architectural Character, Character Areas (if applicable) and Condition and Threats. The Management Plans of the draft CAAMPs has chapters covering Additional Considerations, Development Guidelines and Enhancement.

3.7 Context in relation to the Croydon Local Plan

The current CAAMPs work directly relates to the wider characterisation and place-based approach that is being developed as part of the Croydon Local Plan: Detailed Policies and Proposals.

4. CONSULTATION

- 4.1.1 An extensive amount of public consultation has occurred on the draft SPDs and Croydon Council has worked closely with the local community and local stakeholders in the area to arrive at a shared vision for Old Town.
- 4.1.2 Prior to formal public consultation, four public engagement events took place at key stages during the development of the Masterplan:

April 2012 “Understanding Old Town”: A four day consultation event located in different locations on the streets of Old Town. Passers-by were

asked to record what they liked and felt could be improved about Old Town on large display boards.

Oct 2012 A public meeting to introduce the Masterplan at The Church Hall of The Minster.

March 2013 An “Ideas Workshop” to capture local people’s views of Old Town and aspirations for the area.

June 2013 An “Emerging Ideas Exhibition” was held in Matthews Yard to inform people how the masterplan was developing and ask for feedback.

4.1.3 An Old Town Masterplan email mailing list has been assembled over the course of the public engagement events and now comprises of 120 email addresses. The mailing list is informed of key progress on the project and consultation events.

4.1.4 A stakeholder project board was established in June 2012 comprising of public agencies, key landowners, developers and local interest groups in the area. The following organisations sit on the Old Town Masterplan Stakeholder Project Board:

- BT
- The Church House Business Centre
- Clowater
- Croydon Council
- Croydon Minster
- Croydon Old Town Business Association
- Durkan
- English Heritage
- Greater London Authority
- House of Reeves
- The Portas Town Team
- Q-Park Car Park
- Rosepride
- Transport for London
- The Whitgift Foundation

4.1.5 Consultation with the Old Town Masterplan Stakeholder Project Board included 1:1 meetings between each Stakeholder and Allies and Morrison Urban Practitioners as well as regular group discussion of proposals at the Stakeholder Project Board meetings.

4.1.6 A newly formed community group called We are Croydon Old Town has recently been invited to sit on the board.

4.1.7 The formal consultation process for the draft Old Town Masterplan SPD, the draft Old Town Masterplan SPD Sustainability Appraisal and the draft CAAMPs SPD for the Central Croydon, Church Street and Croydon Minster (formerly

Parish Church) conservation areas adhered to the Council's adopted Statement of Community Involvement (2012) and also the statutory requirements of the Town and Country Planning (Local Planning) (England) Regulations 2012.

Consultation comprised of the following:

- Electronic versions of the draft Masterplan, draft CAAMPs and draft Old Town Masterplan SPD Sustainability Appraisal were made available for download from the Council's website.
- Two public consultation events on the Masterplan, Conservation Area Appraisals and Management Plans and Sustainability Appraisal were held at Matthews Yard in Old Town. One on a Wednesday evening and one on a Saturday. (Approximately 80 people attended in total)
- An exhibition explaining the draft SPDs was on display at the public consultation events for the Masterplan and CAAMPs and at Matthews Yard for a week. The exhibition included a 3d model. (Approximately 30 people attended)

4.1.8 Publicity for the public consultation comprised of the following:

- An email was sent to the Old Town Masterplan mailing list (over 120 addresses), the general conservation mailing list and the Croydon Local Plan consultation contacts database (including statutory consultees) to inform stakeholders about the consultation process.
- Copies of the documents were available to view at Access Croydon and at each of the Borough's libraries.
- Letters were sent to every affected owner and occupier within each conservation area for which a draft CAAMP has been produced. This is a statutory requirement.
- Site notices were placed in several locations within each conservation area for which a draft CAAMP has been produced.
- An advertisement in The Croydon Guardian.

4.2 The Consultation Response Process

4.2.1 A consultation log for each SPD being consulted on has been created to record all representations and the Council's responses to them (Appendices 6 and 7).

4.2.2 The draft Old Town Masterplan SPD, the draft Old Town Masterplan SPD Sustainability Appraisal and the draft CAAMPs SPDs for the Central Croydon, Church Street and Croydon Minster (formerly Parish Church) Conservation Areas have been revised where appropriate in response to relevant comments and feedback.

4.2.3 If requests for amendments to the SPDs through representations are not considered justifiable and /or to comply with existing planning policy and guidance they have not been made. The reasoning behind decisions is provided in the consultation log.

4.2.4 The consultation logs for the Old Town Masterplan and the CAAMPs will form

part of consultation statements for the SPDs that will be published alongside the adoption statement for the SPDs.

4.3 Consultation responses: Old Town Masterplan

- 4.3.1 44 individuals or organisations formally commented on the Old Town Masterplan and over 280 separate comments were submitted.
- 4.3.2 53 respondents expressed support for part or all of the document.
- 4.3.3 No major changes to the content of the masterplan are required as a result of the comments.
- 4.3.4 Approximately 15% of the comments have resulted in minor changes to the document (See Appendix 6: Old Town Masterplan Consultation Log).

4.4 Key amendments to the draft Old Town Masterplan

- 4.4.1 Given the context of the high demand for housing in Croydon, developing on the Council's car parks at Anns Place and Wandle Road has been changed from a long-term priority to a medium term priority in the document.
- 4.4.2 As a result of a shift in context for the Wandle Road car park component: OT27, the possibility of including a district heating centre as a potential use within the site has been added. Other possible uses for the site that could work in conjunction with each other are residential, bus standing and car parking.
- 4.4.3 The proposal that generating most comment was improving vehicular access in to Old Town. Ten residents objected to proposals to improve vehicular access in to Old Town. The proposals have not been altered because it is still considered that, as strategic aspirations, they would bring about significant benefit to Old Town as part of a range of measures to improve movement in and around Old Town, and they would not cause undue harm to local residents. However, to increase clarity it is now stressed in the draft SPD that the proposals are strategic aspirations which if taken forward to detailed design would be subject to further detailed work and consultation. Furthermore, any adverse impacts of changes would need to be ameliorated.
- 4.4.4 To view all the comments and responses see Appendix 7: Consultation Log: Old Town Masterplan.

4.5 Consultation Responses: CAAMPs

- 4.5.1 Sixty-five comments were received on the draft Central Croydon CAAMP SPD, 30 comments were received on the draft Church Street CAAMP SPD, 47 comments were received on the Minster CAAMP and 10 comments were received that applied to all of the CAAMPs. (See Appendix 7: 'Consultation Log: CAAMPs')

- 4.5.1 There are no major changes required as a result of consultation.
- 4.5.2 Minor amendments have been made to the documents mainly to increase clarity.
- 4.5.3 To view all the comments and responses to them see Appendix 7: Consultation Log: CAAMPs’.

5. FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

5.1 Revenue and Capital consequences of report recommendations

- 5.1.1 The budget for the Old Town Masterplan and the Central Croydon, Church Street and Croydon Minster (formerly Parish Church) Conservation Areas is £300,000. £250,000 of the funding is from the Mayor’s Regeneration Fund. £50,000 of funding is from Section 106 Funding.

	Current year	Medium Term Financial Strategy – 3 year forecast		
	2014/15	2015/16	2016/17	2017/18
	£'000	£'000	£'000	£'000
Revenue Budget available				
Expenditure	300			
Income				
Effect of decision from report				
Expenditure	300			
Income				
Remaining budget	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Capital Budget available				
Expenditure	0			
Effect of decision from report				
Expenditure	0			
Remaining budget	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>

5.2 The effect of the decision

- 5.2.1 Endorsing the recommendation to adopt the draft SPDs is a step towards their eventual anticipated adoption.

5.3 Risk

There is a risk that a Judicial Review is pursued by a party that objects to the content of the masterplan SPD and/or the CAAMPs SPDs. If this occurs grounds for a Judicial Review will have to be justified and demonstrate that the SPDs have not been produced in accordance with planning legislation.

5.4 Options

There are no alternative options to recommending endorsement of adoption of the Old Town Masterplan and the CAAMPs for the the Central Croydon, Church Street and Croydon Minster (formerly Parish Church) Conservation Areas, because Croydon Council has a legal agreement with the GLA to produce them.

5.5 Future savings/efficiencies

If they are adopted the Old Town Masterplan and the CAAMPs for Central Croydon, Church Street and Croydon Minster (formerly Parish Church) will provide clear guidance for developers and the development management service at Croydon Council. This will result in more certainty over what constitutes acceptable development in Old Town which should increase the efficiency of the development management process.

If funding opportunities become available which the Old Town Masterplan area could benefit from then

5.6 Approved by: Graham Oliver (Business Partner Development & Environment)

6. COMMENTS OF THE COUNCIL SOLICITOR AND MONITORING OFFICER

6.1 The Solicitor to the Council comments that the draft Old Town Masterplan Supplementary Planning Document and Central Croydon, Church Street and Parish Church Conservation Area Appraisals and Management Plans Supplementary Planning Documents have been produced and consulted on in accordance with Town and Country Planning (Local Planning) (England) Regulations 2012. The draft Old Town Masterplan Supplementary Planning Document Sustainability Appraisal has been produced in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004. Having received representations the Council is required to state how, if needed those issues have been addressed.

6.2 There are no other legal considerations beyond those set out in the body of the report.

6.3 Approved by: Gabriel MacGregor, Head of Corporate Law on behalf of the Council Solicitor and Monitoring Officer

7. HUMAN RESOURCES IMPACT

- 7.1 There are no human resources implications arising from this report.
- 7.2 Approved by Adrian Prescod, HR Business Partner, for and on behalf of Director of Human Resources, Chief Executive department.

8. EQUALITIES IMPACT

- 8.1 The Croydon Local Plan – Strategic Policies Equalities Impact Assessment applies to all the *Conservation Area Appraisals and Management Plans* that are proposed for consultation.
- 8.2 The first stage Equalities Analysis for the draft Old Town Masterplan identified the following key issues: are the need to improve accessibility to public transport for those with mobility issues and safety in the evening for the young and old.
- 8.3 An Equalities Analysis for the Old Town Masterplan is attached to this report – see Appendix 8.
- 8.4 The Equality Analysis for the Croydon Local Plan: Strategic Policies, September 2011, did not identify any potential adverse impacts as a result of the Heritage and the Built Environment policy CS8 (renamed Urban Design and Local Character policy SP4 in the adopted Croydon Local Plan). The assessment identified some elements of the Croydon Local Plan which might have a significant impact on the equality groups. The negative impact identified in connection with the Heritage and the Built Environment, policy CS8, was the lack of accessibility to historic buildings, and that communities don't feel served by historic buildings, with distinctiveness at the expense of equality and diversity commitments. As a consequence the Croydon Local Plan policy SP4 was amended to include policy (SP4.11) that states 'The Council and its partners will promote the use of heritage assets and local character as a catalyst for regeneration and cohesion and to strengthen the sense of place', and SP4.15 that states 'The Council and its partners will promote improvements to the accessibility of heritage assets to allow enjoyment of the historic environment for all.'
- 8.5 The Equalities Analysis - Croydon Local Plan: Strategic Policies concluded 'The assessment has found that the Core Strategy is overall very supportive of equality groups addressing spatial inequality in the borough, and considering the needs and priorities of all sections of the community by:' (The EA then listed 6 points, the 6th being 'Seeking to conserve and create spaces and buildings that are safe, accessible and that foster cohesive communities'.)
- 8.6 The Equality Analysis - Croydon Local Plan: Strategic Policies and the Equalities Analysis: Old Town Masterplan will enable the Council to ensure that it meets the statutory obligation in the exercise of its functions to address the Public Sector equality duty (PSED). This requires public bodies to ensure due regard to the need to advance equality of opportunity; foster good relations

between people who share a “protected characteristic” and those who do not and take action to eliminate the potential of discrimination in the provision of services.

9. ENVIRONMENTAL IMPACT

- 9.1 The Old Town Masterplan promotes sustainable development and sustainable travel. The Old Town Masterplan Supplementary Planning Document Sustainability Appraisal has been produced in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004.
- 9.2 The adoption of the Old Town Masterplan will result in future development in the Old Town Masterplan study area being guided by site specific planning guidance. This in turn should help improve the quality of development and public realm in the area and strengthen its historic identity so that it becomes a key destination in the Croydon Metropolitan Centre.
- 9.3 The draft CAAMPs promote creating a more attractive environment which should encourage walking and cycling in the conservation areas.

10. CRIME AND DISORDER REDUCTION IMPACT

- 10.1 The reduction of crime and fear of crime and disorder in Old Town is supported through proposals in the SPDs to increase footfall and overlooking of streets in Old Town which in turn would increase natural surveillance.

11. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

- 11.1 The adoption of the draft Old Town Masterplan SPD and the draft CAAMP SPDs for the Central Croydon, Church Street, Croydon Minster conservation areas will result in site specific planning guidance being available. This in turn should result in the preservation and enhancement of the historic environment; high quality development that respects the historic environment; improvement to the public realm and movement in, out and through the Old Town Masterplan study area.
- 11.2 To comply with statutory obligations and also to improve upon the draft Masterplan document through consultation before adoption as a Supplementary Planning Document.

12. OPTIONS CONSIDERED AND REJECTED

- 12.1 The only other option would be to do nothing. This would mean that contractual obligations with the GLA would not be fulfilled. It would also result in guidance not being in place to preserve and enhance the historic environment of Old Town.

CONTACT OFFICER: Tim Naylor, Head of Spatial Planning ext 62615

BACKGROUND PAPERS – LOCAL GOVERNMENT ACT 1972: none

APPENDICES (e-copy only)

Draft Old Town Masterplan

APPENDICES:

Appendix 1: Old Town Masterplan (draft supplementary planning document)

Appendix 2: Old Town Masterplan Supplementary Planning Document (SPD) Sustainability Appraisal

Appendix 3: Central Croydon Conservation Area Appraisal and Management Plan (draft supplementary planning document)

Appendix 4: Church Street Conservation Area Appraisal and Management Plan (draft supplementary planning document)

Appendix 5: Croydon Minster (formerly Parish Church) Conservation Area Appraisal and Management Plan (draft supplementary planning document)

Appendix 6: Consultation Log: Old Town Masterplan SPD and Old Town Masterplan Supplementary Planning Document Sustainability Appraisal

Appendix 7: Consultation Log: Central Croydon, Church Street and Croydon Minster CAAMP SPDs

Appendix 8: Equalities Analysis: Old Town Masterplan

BACKGROUND DOCUMENTS:

Understanding Place: Conservation Area Designation, Appraisal and Management, English Heritage (2011) available at: <http://www.english-heritage.org.uk/publications/understanding-place-conservation-area/>

The Croydon Local Plan – Strategic Policies: Equalities Impact Assessment