

**For General Release**

<b>REPORT TO:</b>	<b>CABINET 11 July 2016</b>
<b>AGENDA ITEM:</b>	<b>7.1</b>
<b>SUBJECT:</b>	<b>Croydon Local Plan: Strategic Policies – Partial Review (Proposed Submission)</b>
<b>LEAD OFFICERS:</b>	<b>Jo Negrini, Acting Chief Executive Heather Cheesbrough, Director of Planning &amp; Strategic Transport</b>
<b>CABINET MEMBER:</b>	<b>Councillor Alison Butler – Deputy Leader (Statutory) – Cabinet Member for Homes, Regeneration and Planning</b>
<b>WARDS:</b>	<b>All</b>

**CORPORATE PRIORITY/POLICY CONTEXT/AMBITIOUS FOR CROYDON:**

The Croydon Local Plan will set the growth and development vision and planning policies for the borough from 2016 – 2036. The Croydon Local Plan will provide the planning policy basis for the borough to plan for the borough’s housing need, deliver necessary affordable housing, accommodate sustainable growth, regenerate the district centres, strengthen neighbourhood and local centres, safeguard and provide employment floorspace and deliver a renewed Croydon Opportunity Area, with a residential population of up to 20,000 people, a comprehensively developed retail core and provision of public realm and infrastructure.

The Corporate Plan (2015-2018) sets out how the council will deliver on three key ambitions:

- GROWTH, creating growth in our economy;
- INDEPENDENCE, helping residents to be as independent as possible;
- LIVEABILITY, creating a welcoming, pleasant place in which local people want to live.

Ambition Priority One of the Corporate Plan, growth is underpinned by the Croydon Local Plan, enabling development to occur in sustainable locations, in a desired form and at the appropriate time. The Croydon Local Plan establishes the planning policy vision and the statutory basis with which to support the growth and development objectives delivered through the Croydon Promise and Places Plans.

The Corporate Plan contains the Council’s contribution to Croydon’s Community Strategy 2016-2021 developed by Croydon’s Local Strategic Partnership (LSP). The Community Strategy is the overarching strategy for the borough and sets out the direction for the Local Strategic Partnership for the next five years and beyond, with the focus on three overarching outcomes, each with their individual priorities, which will see Croydon become:

- a place to learn work and live through ambitious placemaking, regeneration, economic growth, cultural renaissance and providing a safe pleasant environment
- a place of opportunity for everyone through better education, health promotion, supporting independence and resilience, and tackling poverty

deprivation and homelessness

- a place with a vibrant and connected community and voluntary sector through enabling communities to connect, collaborate and take responsibility where they see a need and have capacity and commitment to provide for it.

The Community Strategy is set within the context of 'We are Croydon', Croydon's long term vision that was developed by approximately 20,000 residents and adopted in 2010. Croydon's vision is to be

*Enterprising* - a place renowned for its enterprise and innovation with a highly adaptable and skilled workforce and diverse and thriving local economy

*Connected* - a place that is well connected, easy to get to and around, and supported by infrastructure that enables people to easily come together; with one of the best digital, communications and transport networks in the country

*Creative* - a place that draws people to its culture and creativity – an inspiration and enabler of new artistic and sporting talent

*Sustainable* - a place that sets the pace amongst London boroughs on promoting environmental sustainability and where the natural environment forms the arteries and veins of the city

*Learning* - a place that unleashes and nurtures local talent and is recognised for its support and opportunity for lifelong learning and ambitions for children and young people

*Caring* - a place noted for its safety, openness and community spirit where all people are welcome to live and work and where individuals and communities are supported to fulfil their potential and deliver solutions for themselves.

The Croydon Local Plan will assist in delivery of Croydon's vision and the Partnership's priorities for each outcome.

**FINANCIAL IMPACT** The Croydon Local Plan can be delivered from the Croydon Local Plan budget (reserve) 2015 – 2018.

**KEY DECISION REFERENCE NO.:** Not a key decision as defined by the Council's constitution

The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations below

## **1. RECOMMENDATIONS**

- The Cabinet is recommended to
- 1.1 To approve the draft Croydon Local Plan: Strategic Policies – Partial Review (Proposed Submission) Appendices 1 and 2 (**e-copy only**) for Regulation 19 (The Town and Country Planning (Local Planning) (England) Regulations 2012) publication.
  - 1.2 To approve the draft Council responses to the comments on the Croydon Local Plan: Strategic Policies- Partial Review (Preferred and Alternative Options) Appendix 3 (**e-copy only**) made during the consultation on 6 November 2015 to 18 December 2015 inclusive.
  - 1.3 Delegate to the Director of Planning and Strategic Transport, in consultation with Deputy Leader Statutory - Cabinet Member for Homes, Regeneration & Planning, the making of minor and factual amendments to the Croydon Local Plan: Strategic Policies - Partial Review (Proposed Submission) prior to publication.
  - 1.4 To approve the Submission of the Croydon Local Plan: Strategic Policies - Partial Review, which is not an executive decision, be reported directly to Council with the delegated approval of the Deputy Leader Statutory - Cabinet Member for Homes, Regeneration & Planning for any proposed main modifications to the Croydon Local Plan: Strategic Policies - Partial Review post proposed submission publication to be approved by Council.

## **2. EXECUTIVE SUMMARY**

Why undertake the Croydon Local Plan: Strategic Policies - Partial Review? - (Referred to as CLP1.1 in this report).

- 2.1 The Croydon Local Plan: Strategic Policies (CLP1) was adopted in April 2013. The Plan sets out the vision, development objectives and strategic planning policies for the borough from 2011 to 2031. In April 2013 the Council also adopted the Croydon Opportunity Area Planning Framework (COAPF). The Croydon Local Plan: Strategic Policies and COAPF work alongside a series of Masterplans for Croydon Opportunity Area.
- 2.2 The Croydon Local Plan: Strategic Policies - Partial Review (CLP1.1) is needed for a number of key reasons and these are addressed in turn below.
- 2.3 Ambitious for Croydon is enshrined in the overall vision, objectives and policies of CLP1.1 to ensure Croydon continues to be an attractive and thriving place for all to live, work and visit, including increasing the supply of homes through sustainable growth (together with affordable homes), the renewal and regeneration of Croydon Opportunity Area and the borough's District Centres, increased emphasis on culture and setting the environment for employment opportunities and economic growth.
- 2.4 Croydon's Community Strategy (2016 – 2021) priorities of a place to learn work

and live through ambitious placemaking, a place of opportunity for everyone and a place with a vibrant and connected community are all supported by CLP1.1 and provide the framework for the delivery of these priorities.

- 2.5 The government approving the Council's Growth Zone status is very positive news for the sustainable development of the borough and the delivery of infrastructure. CLP1.1 sets the planning framework to allow the development that underpins the Growth Zone and plans for the infrastructure the Growth Zone will deliver with partners.
- 2.6 Finally, the Further Alterations to the London Plan were adopted in 2015, CLP1.1 is necessary to ensure conformity with the London Plan at the earliest opportunity to ensure the borough has an up to date development plan, including reflecting the new development requirements set out in the London Plan.

### Background

- 2.7 The Croydon Local Plan: Strategic Policies Partial Review (CLP1.1) is the most important planning policy document for the borough and provides an exciting and deliverable vision for Croydon up to 2036. It sets a proactive framework for the planning and management of development in the borough over that period; and it will continue to serve as the foundation for planning decisions and a range of other planning documents, in particular the Croydon Local Plan: Detailed Policies and Proposals (CLP2).
- 2.8 The CLP1.1 (Proposed Submission) is a draft planning policy document to form the basis of public and stakeholder consultation on the development of the Croydon Local Plan: Strategic Policies Partial Review in accord with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Council's adopted Statement of Community Involvement 2012.
- 2.9 The preferred and alternative options (Regulation 18 of the above Act) were consulted on from 6 November to 18 December 2015. This consultation resulted in an unprecedented number of representations and attendees at our consultation events. This engagement in the Local Plan process is welcomed and the comments received have helped shape this version of CLP1.1. The changes that have been made to CLP1.1 as a consequence of the valuable consultation are set out in summary form in appendix 4 and in full in appendix 3.
- 2.10 CLP1.1 enshrining Ambitious for Croydon and Croydon's Community Strategy's (2016 – 2021) priorities will ensure Croydon continues to be an attractive and thriving place for all to live, work and visit and provide the best opportunity for the 2036 vision of the borough to be realised.
- 2.11 Once fully adopted CLP1.1 will form part of the development plan for the borough along with the Croydon Local Plan: Detailed Policies and Proposals, (CLP2), South London Waste Plan and the London Plan. On adoption, the borough will have an up to date development plan that is focussed on sustainable growth, meeting the need for homes, jobs and associated infrastructure, whilst respecting and enhancing the character of Croydon. The

Plan will set this strategic context for 20 years as national guidance recommends.

- 2.12 The adoption of the Further Alterations to the London Plan (2015), which increase the borough's housing target from 1,330 per annum to 1,435 per annum. Adoption of this target by The Mayor has rendered the existing housing requirements in the Croydon Local Plan: Strategic Policies obsolete. This combined with the desirability of extending the life of the Croydon Local Plan: Strategic Policies and having an up to date development plan provides the justification for the need to undertake the partial review.
- 2.13 The CLP1.1's preferred approach for accommodating the Further Alterations to the London Plan housing target, and exceeding it in a sustainable manner, is to accommodate growth within the existing urban area of the borough. Population growth means that an additional 42,930 new homes would be needed in Croydon by 2036 to meet the need for new homes. There is limited developable land available for residential development within the built up area meaning that it is only possible to plan for 31,850 new homes in the Plan period 2016-2036. This will be achieved through the Croydon Opportunity Area accommodating at least 10,650 dwellings, sites beyond the Croydon Opportunity Area being allocated for at least 7,300 dwellings, sustainable growth of the suburbs and windfall sites achieving in the region of 9,210 dwellings and bringing vacant dwellings back into use.
- 2.14 The CLP1.1 also proposes changes to a number of other policies to reflect new evidence, change in circumstances and Croydon's Community Strategy (2016 – 2021). These primarily relate to affordable housing policy, the number of pitches needed for Gypsy and Travellers, the need for industrial and employment space, ensuring strategic employment locations fulfil that strategic function, identification of Neighbourhood Centres, review of archeological priority areas, a move from Local Areas of Special Character to Local Heritage Areas and a review of Local Designated Views, Panoramas and Landmarks.
- 2.15 The CLP1.1 (Proposed Submission) is considered to be positively prepared, justified, effective and consistent with London Plan and national policy as required by national guidance.
- 2.16 The costs associated with evidence base, Plan production and undertaking consultation on the CLP1.1 (Proposed Submission) can be met from the Local Plan Budget (reserve) 2015-18.

### **3. DETAIL**

- 3.1 The key catalyst for the partial review is the adoption of the Further Alterations to the London Plan, which increase the borough's housing target from 1,330 per annum to 1,435 per annum. Adoption of this target by The Mayor has rendered the existing housing requirements in the Croydon Local Plan: Strategic Policies obsolete. This combined with the desirability of extending the life of the Croydon Local Plan: Strategic Policies and having an up to date development plan provides the justification to undertake the partial review.

#### **The national context**

- 3.2 The National Planning Policy Framework states that “Local Plans are the key to delivering sustainable development that reflects the vision and aspirations of local communities”.
- 3.3 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that “planning decisions must be taken in accordance with the development plan unless material considerations indicate otherwise”. Currently the development plan in Croydon consists of the London Plan, the Croydon Local Plan: Strategic Policies, the saved policies of the Unitary Development Plan and the South London Waste Plan.
- 3.4 The National Planning Policy Framework states that Local Plans must be positively prepared, justified, effective and consistent with national policy.
- 3.5 To be positively prepared the Plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
- 3.6 To be justified the Plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.
- 3.7 To be effective the Plan should be deliverable over its time period and based on effective joint working on cross-boundary strategic priorities.

**The Croydon Local Plan**

- 3.8 A new Croydon Local Plan is being prepared to replace the saved policies of the Unitary Development Plan which were adopted in 2006 and to update the Strategic Policies to reflect the new London Plan adopted in March 2015. Following the publication of the National Planning Policy Framework in March 2012 the saved policies of the Unitary Development Plan could have reduced weight if they are found to be out of alignment with the government’s planning policies as expressed in the National Planning Policy Framework.
- 3.9 The Croydon Local Plan is split into two documents, the Strategic Policies Development Plan Document (CLP1) and the Detailed Policies and Proposals Development Plan Document (CLP2).
- 3.10 The Croydon Local Plan: Strategic Policies Development Plan Document was adopted by the Council on 22nd April 2013 and, along with the London Plan, the remaining saved policies of the Unitary Development Plan and the South London Waste Plan, forms the current development plan for Croydon. Along with the draft Proposed Submission CLP1.1, a draft Proposed Submission consultation report of CLP2 is being presented to this Cabinet in a separate report.
- 3.11 The Croydon Local Plan: Detailed Policies and Proposals (CLP2) will replace the remaining saved policies of the Unitary Development Plan (set out in Appendix 3). Upon adoption it will become part of the development plan for Croydon and will benefit from the full weight afforded to development plan

policies under Section 38(6) of the Planning and Compulsory Purchase Act 2004.

- 3.11 The Further Alterations to the London Plan sets a 20 year housing target of 42,000 per annum and Croydon's figure of 1,435 dwellings per annum. However, these figures are driven by the Mayor's Strategic Housing Land Availability Assessment (SHLAA) and Mayor's objectively assessed housing need for London is 49,000 per annum. The Mayor is clear that planning for the Further Alterations to the London Plan target alone will not be sufficient to achieve the statutory requirement of general conformity with the London Plan. Councils have to demonstrate how they are seeking to exceed this target and contribute to the 49,000 per annum target.
- 3.12 In addition to the Further Alterations of the London Plan housing target the Council has undertaken a Strategic Housing Market Assessment (SHMA). A SHMA is an objective assessment of housing need. Croydon's SHMA has been produced in accordance with the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance. Paragraph 159 of the NPPF requires local authorities to have a clear understanding of housing needs in their area by preparing a SHMA. A SHMA should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:
- Meets household and population projections, taking account of migration and demographic change;
  - Addresses the need for all types, including affordable housing and the needs of different groups in the community; and
  - Caters for housing demand and the scale of housing supply necessary to meet this demand.
- 3.13 The SHMA objectively assesses the quantity of housing needed in Croydon up to 2036. It identifies an Overall Housing Need for the borough, identifies the need for affordable housing and also the needs of different groups including older people, people with disabilities, BME households, households with children, young people and those wanting to build their own home. It also sets out the need of different types of housing by housing type and size.
- 3.14 In accordance with the NPPF, the SHMA has produced an overall housing need (based on the 2012 - based subnational population projections and the 2011 household projections produced by DCLG). The SHMA produces an overall housing need of 2,146 dwellings per year from 2013 to 2036, representing an additional 42,930 homes. In addition, the SHMA has produced a figure based on the same methodology used in the GLA's SHMA for the Further Alterations to the London Plan.

### Summary of Croydon's housing figures

Source	Figure per annum
Further Alterations to the London Plan 2015	1,435
Further Alterations to the London Plan 2015 – Central variant	1,807
Strategic Housing Market Assessment	2,146

- 3.15 Most of the need for new homes in Croydon results from natural growth of the borough's population (more births than deaths). A proportion of it, however, is related to people moving to Croydon from elsewhere in the UK or overseas and historically more people have moved to Croydon than have been leaving each year (which on average between 2004 and 2013 meant that 121 more people moved the borough each year than left, and of these just under 20% were from outside of the UK). However, it is important to meet the need for homes from people arriving from outside of the borough as simply not providing for them will result in overcrowding, negatively impact on well being and increase competition for accommodation and, therefore, the price of homes in Croydon (either to buy or rent) will rise making them more unaffordable to residents of the borough.
- 3.16 CLP1.1's preferred approach for accommodating the Further Alterations to the London Plan housing target, and exceeding it in a sustainable manner, is to accommodate growth within the existing urban area of the borough and this preferred option was consulted on in November and December 2015. The growth will be achieved through the Croydon Opportunity Area accommodating at least 10,650 dwellings, sites beyond the Croydon Opportunity Area being allocated for at least 7,300 dwellings and sustainable growth of the suburbs, windfall sites achieving in the region of 9,210 dwellings and maximising growth within district and local centres. Alongside, previous completions and bringing vacant buildings back into use it is anticipated that at least 31,850 dwellings will be delivered over the plan period 2016 – 2036.
- 3.17 This approach is considered to be in conformity with the NPPF and London Plan policy in terms of delivering sustainable growth within the urban area, without the release of Metropolitan Green Belt and Metropolitan Open Land. Furthermore, through the Sustainability Appraisal process, it is clear that in sustainability terms accommodating development within the existing urban area is the favourable option. Due to these two factors it is considered that no other reasonable alternative(s) for accommodating development exist, and hence, the preferred option of accommodating development in the urban area is the option taken forward to be consulted on in the Proposed Submission Plan.
- 3.18 What CLP1.1 demonstrates is that in the face of the considerable population growth London faces; and as a consequence, the challenges Croydon faces to meet housing need (and address the unarguable need for affordable housing), Croydon is willing to plan for growth, which is evident from the selected preferred option now taken forward in the Proposed Submission Plan. What is essential is that London and South London also take responsibility for London's growth and their growth. Croydon will be working hard with the GLA and its neighbours to ensure this is the case.

3.19 The Proposed Submission draft of CLP1.1 also includes revisions to the following.

- Coulsdon reassessed and identified as a Place with potential for moderate rather than medium residential growth, and included along with Thornton Heath in the policy SP1.3
- Tier 2' employment locations to ensure they are still performing a strategic employment function.
- Amendments to the Plan's affordable housing policy are included to ensure continued supply, confirm that on-site provision is preferred, set a fixed affordable housing requirement and acknowledge the pending introduction of Starter Homes.
- Amending the mix of homes from analysis of the Strategic Housing Market Assessment to be adjusted from 60% to 50% of all new homes to have three or more bedrooms and applied to all areas of the borough.
- Updating of the Plan's 'Quality and Standards' policies on homes to refer to the National Technical Standards 2015.
- The number of pitches for Gypsy and Travellers to be delivered reflecting the Gypsy and Traveller Accommodation Needs Assessment (2014)
- Identification of neighbourhood centres, these are locations that are identified on the basis of their ability to support existing and future communities through the provision of community uses.
- A review of the borough's Archaeological Priority Areas. The areas are:
  - Croham Hurst Round Barrow
  - Riddlesdown Road
  - Farthing Down
  - Lion Green Road
  - Park Lane Anglo-Saxon Cemetery
  - Russell Hill
  - Elmers End
  - RAF Kenley
  - Addington and Addington Park
  - Central Croydon
  - Old Coulsdon
  - Sanderstead
  - Watendone
  - Ampere Way
  - Waddon
  - Mere Bank
  - Addington Hills

Croham Hurst  
Pampisford Road  
Pollards Hill  
Deepfield Way  
Hook Hill  
Cane Hill  
Ashburton Park  
Haling Grove  
London to Brighton Roman Road  
London to Lewes Roman Road  
Croydon 19th Century Cemeteries  
Croydon Downs

- A change from Local Areas of Special Character to Local Heritage Areas with a focus on the designation being principally heritage value based. The proposed Local Heritage Areas are:

Addiscombe College Estate  
Auckland Road  
Beatrice Avenue  
Bingham Road  
Birdhurst Road  
Bishops Walk  
Brighton Road (Purley)  
Campden Road and Spencer Road  
Chipstead Valley Road (St Dunstan's Cottages)  
Henderson Road  
Ingatestone Road  
Laud Street area  
London Road (Broad Green)  
London Road (Norbury)  
Pollards Hill South  
Portland Road (Market Parade)  
Portland Road Terraces  
South End with Ye Market  
St Peter's Road  
Station Approach (Coulsdon)  
Stoats Nest Village  
Stuart Crescent

The Dutch Village  
Thornton Heath High Street  
Upper Shirley Road

- A review of the Local Designated Views, Croydon Panoramas and Local Designated Landmarks.

The proposed Local Designated Landmarks are:

Cane Hill Water Tower  
Clock Tower, High Street, Thornton Heath  
Clock Tower, Station Road, South Norwood  
Croydon Minster Ikea Towers, part of former power station  
No.1, Croydon, George Street  
NTL Mast, South Norwood Hill  
St. Peter's Church, St. Peter's Road, South Croydon  
The Town Hall Clock Tower, Croydon  
Park Hill Water Tower  
All Saints Church, Sanderstead  
Addington Palace  
Shirley Windmill  
Whitgift Almshouses, North End  
St. Andrew's Church, Woodmansterne Road, Coulsdon

The proposed Croydon Panoramas are:

From Addington Hills of Croydon Metropolitan Centre  
From Biggin Hill of Croydon Metropolitan Centre  
From Croham Hurst looking south west of Purley and Downs  
From Farthing Downs of Coulsdon  
From Norwood Grove of Croydon Metropolitan Centre  
From land adjacent to Parkway and North Downs Crescent of Addington Palace and Shirley Hills  
From Pollards Hill of Croydon Metropolitan Centre  
From Purley Way Playing Field of Croydon Metropolitan Centre  
From Riddlesdown of Kenley  
From Ross Road of Ikea Towers  
From Kenley Common of Riddlesdown

The proposed Local Designated Views are:

From Crown Hill of Croydon Minster  
From Farthing Downs of Cane Hill  
From George Street of No.1, Croydon, George Street  
From Heathfield of Selsdon and New Addington  
From High Street of the Clock Tower, Thornton Heath  
From Addiscombe Road by Sandilands Tramstop of No1 Croydon  
From High Street south west, of the Clock Tower, South Norwood  
From North End of the Town Hall Clock Tower  
From Oliver Grove of the Clock Tower, South Norwood  
From Roman Way south of Croydon Minster  
From South Norwood Hill of the Shirley Windmill  
From Park Hill of Croydon Metropolitan Centre  
From Selsdon Road of St Peter's Church  
From Woodcote Grove Road of Cane Hill and St. Andrews Church  
From Limpsfield Road, near Wentworth Way of All Saints' Church  
From High Street north east, of the Clock Tower, South Norwood  
From Church Street of Whitgift Almshouses & No1 Croydon  
From Roman Way north of Croydon Minster

- Updating policy on sustainable design and construction to align with current legislation and the National Technical Standards 2015
- Revision to the uses classified as community facilities with the addition of public houses, and post offices, and the removal of care homes, residential homes and nursing homes
- Additional reference in policy on flooding to the application of the Sequential and Exception Tests requirement for developments proposed in locations identified as at risk of flooding.
- A review of the designations of Metropolitan Green Belt and Metropolitan Open Land with proposed revisions.

The proposed additions to Metropolitan Green Belt are:

Addington Vale  
Bradmore Green, Old Coulsdon  
Coulsdon Iron Railway Embankment  
Courtwood Playground  
Land at Rogers Close, Old Coulsdon  
Land between the Bridle Way and Selsdon  
Land in Tollers Lane  
Land off Lower Barn Road

Land on Riddlesdown Road  
 Land SW of Cudham Drive, Flora Gardens and Corbett Close,  
 New Addington  
 Land to rear of Goodenough Close, Middle Close and Weston  
 Close, Old Coulsdon  
 Land to south of Croham Hurst  
 Milne Park, New Addington.  
 St Edmund's Church green  
 St. John the Evangelist's churchyard, Old Coulsdon  
 Sanderstead Recreation Ground  
 The Bridle Road, Shirley

The proposed designation change from Metropolitan Green Belt to  
 Metropolitan Open Land of the following:

Croham Hurst  
 Purley Downs

The proposed designation change from Metropolitan Green Belt to Local  
 Green Space of the following:

Sanderstead Plantation

The proposed de-designation of Metropolitan Open Land that does not  
 meet the criteria for designation:

Land at Shirley Oaks, - Three areas of this land to be re-  
 designated as Local Green Space (approximately two thirds of the  
 total space).

- Updates to Sustainable travel choice to support Transport for London  
 and Network Rail proposals in the supporting text to the policy on  
 Transport and Communication.

3.20 The proposed submission is expressed as a series of tracked changes to CLP1  
 Strategic Policies (2013) and it is only the tracked changed element of Croydon  
 Local Plan: Strategic Policies Partial Review that is being consulted on. This  
 continues with the format of the preferred and alternative options consulted on  
 in November 2015.

3.21 Recommendation 1.3 is necessary to ensure that at the time the consultation  
 on the Croydon Local Plan: Strategic Policies Partial Review commences (a  
 few weeks post Cabinet) the Plan is up to date, factually correct and minors  
 amendments can be made to support the consultation.

3.22 The timetable for preparation of the Croydon Local Plan: Strategic Policies  
 Partial Review is set out below:

Stage	When
Consultation on Croydon Local Plan: Strategic Policies Partial Review (Preferred and Alternative Options)	6 November to 18 December 2015

<b>Stage</b>	<b>When</b>
Proposed Submission draft of Croydon Local Plan: Strategic Policies Partial Review	5 September to 17 October 2016
Submission of Croydon Local Plan: Strategic Policies Partial Review to the Secretary of State	December/January 2016
Independent examination by a planning inspector	Spring/Summer 2017
Adoption of Croydon Local Plan: Strategic Policies Partial Review as the Council's planning policies	Winter 2017

#### **4. CONSULTATION**

- 4.1 The Croydon Local Plan: Strategic Policies-Partial Review (Preferred and Alternative Options) was consulted on from 6 November to 18 December 2015. Posters were displayed in the libraries and copies of the documents made available. The consultation was also publicised on the Council's website, on Facebook and Twitter, the latter daily reminding the public about the dates and locations of the Council's consultation. It was also on the Council's weekly email alert to residents and in 'Your Croydon'. A new platform of social media called Street Life also posted the same post as the Facebook page onto their webpage. There were six joint drop in events for the Croydon Local Plan for both the Strategic Policies – Partial Review and the Detailed Policies and Proposals with five events focussing on some of the 16 Places each and with one event covering the whole of the borough. However all Places could be discussed at any of the events. They were held on three Wednesdays, two Tuesdays and one Saturday, with the weekday venues opening for 3.5 to 4.5 hours commencing from 3.30pm, depending on availability of the venue, the latest start being 4.30pm, and all ending at around 8pm. The weekday events were held at Addington Community Centre, New Addington, St John's Community Hall, Selsdon, Christ Church Methodist Church Hall, Addiscombe, Purley Baptist Church and South Norwood Methodist Church. The Saturday event was held at the Community Space in Bernhard Weatherill from 10 am to 2pm and covered the entire borough. A total of 831 people signed in at the events.
- 4.2 The draft CLP1.1 (Proposed Submission) takes into consideration the responses to the November 2015 consultation on the Strategic Policies – Partial Review. A summary of those consultation responses and the amendments made to the draft Croydon Local Plan: Strategic Policies – Partial Review (Proposed Submission) are set out in the table below. Note that where there were no comments that entailed any further consideration and/or changes, the policies have been omitted in the table. The full consultation log can be found in Appendix 3 to this report. At the end of the consultation period 3,078 individual people and organisations made duly made representations on the CLP1.1 (Preferred and Alternative Options).
- 4.3 A summary of the main comments received on CLP1.1 (Preferred and Alternative Options) consultation November 2015 and the Council's response and changes made to Croydon Local Plan: Strategic Policies – Partial Review

(Proposed Submission) are set out in Appendix 4.

- 4.4 A total of 1,493 representations of 8,159 representations received were not duly made. Of these 560 were not duly made because they did not have a named person and/or postal or e-mail address. The Council received 771 (of the 1,493), representations containing discriminatory comments about Romany Gypsies, English Gypsies or Irish Travellers, or another specific ethnic group. These were not considered duly made as they contravene the Equality Act 2010. 140 out of the 1,493 not duly made representations were not considered to be duly made because they arrived after the close of the consultation and were therefore considered to be late. These statistics cover both the Detailed Policies and Proposals (Preferred and Alternative Options) and the Strategic Policies – Partial Review (Preferred and Alternative Options).
- 4.5 The next stage in preparing the CLP1.1 is to publish the Proposed Submission draft for comment with all comments to be sent to the Planning Inspectorate for consideration by an independent planning inspector at an Examination in Public. This report is seeking endorsement to publish CLP1.1 (Proposed Submission) report for comment. This will fulfil the requirements of Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Council's adopted Statement of Community Involvement 2012. The publication is not a consultation as the Council is not able to make changes to the Local Plan following publication. Any proposed changes will be considered by the independent planning inspector. The Council is however able to recommend main modifications to the planning inspector. Any main modifications arising from the publication of the Proposed Submission report will be presented to Council with the report seeking approval to submit CLP1.1 to the Secretary of State.
- 4.6 The publication will be communicated by the following:
- Emails and/or letter to the Local plan consultee database, regularly updated- a list of all the organisations and stakeholders, Croydon engages with on planning documents, this includes the Duty to Cooperate authorities, Statutory Bodies, landowners and developers and local community organisations, businesses and residents.
  - Printed media and libraries- adverts in the local newspaper, and council communications including e-bulletins to promote the publication period
  - A printed copy of the CLP1.1 (Proposed Submission) will be provided for all Councillors at the start of the Publication period.
  - The Proposed Submission documents will be sent to all the libraries with promotional material such as posters for notice boards. Opportunities for information stands will be considered.
  - Web pages, and social media such as Facebook, Wordpress, YouTube and Flickr will be utilised to reach as many people as possible
- 4.7 It is planned that Submission of CLP1.1 and any main modifications will be reported to Council on 5 December 2016.

## **5 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS**

### **5.1**

## 1 Revenue and Capital consequences of report recommendations

	Current Financial Year	M.T.F.S – 3 year Forecast		
	2016/17	2017/18	2018/19	2019/20
	£'000	£'000	£'000	£'000
<b><u>Reserve available</u></b>				
Expenditure	0	0	0	0
Income	(253)	(78)	0	0
<b><u>Effect of Decision from Report</u></b>				
Expenditure CLP1.1 <sup>1</sup>	70	40	0	0
Expenditure CLP2 <sup>2</sup>	105	38		
Income	0	0	0	0
<b>Remaining Budget</b>	<b>(78)</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b><u>Revenue Budget available</u></b>				
Expenditure	0	2	0	0
<b><u>Effect of Decision from report</u></b>				
Expenditure CLP1.1	0	2	0	0
<b>Remaining Budget</b>	<b>(78)</b>	<b>0</b>	<b>0</b>	<b>0</b>

## 2 The effect of the decision

The CLP1.1 is one stage in the process of preparing the Croydon Local Plan: Strategic Policies Partial Review. Stakeholder engagement is a statutory requirement in preparing a Development Plan Document, of which CLP1.1 is one. Undertaking consultation enables further work on CLP1.1. All the current work required to support CLP1.1 is accounted for within the current Spatial Planning Service resource level and Local Plan budget (reserve) 2016-18. There is an earmarked reserve of £253k set aside for the delivery of the Croydon Local Plan and the expenditure for this element of the Local Plan can be funded from this reserve. Once all expenditure is taken into account, this reserve will be fully spent and an additional £2k budget will be required to fund the project. This will be funded through existing revenue budgets or through reduced spending up to 2018.

## 3 Risks

<sup>1</sup>Croydon Local Plan: Strategic Policies- Partial Review

<sup>2</sup> Croydon Local Plan: Detailed Policies and Proposals

The preparation of the CLP1.1 is a complex multi-stage process, being prepared to a tight timetable. There is therefore inherent risk that any unforeseen circumstances, additional analysis or legal challenge will result in additional financial costs above those available and could delay the final adoption of the CLP1.1.

These are being mitigated to reduce their impact with a programme management approach and up front communication with key stakeholders including statutory organisations. Further work is currently being undertaken to monitor the processes to ensure the document is found to be sound and based on up to date evidence.

As the CLP1.1 will be part of the overarching Local Planning Authority's spatial planning strategy for the next twenty years, it is also essential that it is of sufficient quality and purpose to ensure the Council can achieve its Vision.

#### **4 Options**

There are no options with regard to consultation, as most of the processes being undertaken are specified by statutory requirements or by government policies. Failure to undertake sufficient evidential analysis or stakeholder consultation may prompt challenge at the Public Examination stage, increasing overall costs.

In the absence of the CLP1.1, future planning decisions will be at risk of challenge as there could be the absence of an up to date development plan and possible non-conformity with London Plan policy.

#### **5 Future savings/efficiencies**

A sound CLP1.1 will contribute indirect financial savings by assisting the regeneration of the borough through the setting of a firm planning framework that will provide certainty to the community and developers, mitigate cost associated with planning appeals and ensure the Council has an up to date development plan as set out in government guidance, which could become a performance requirement under emerging government policy.

**6** Approved by: Zulfiqar Darr, Interim Head of Finance - Place & Resources

### **6. COMMENTS OF THE COUNCIL SOLICITOR AND MONITORING OFFICER**

- 6.1 The Council Solicitor comments that the Croydon Local Plan: Strategic Policies Partial Review (Proposed Submission) forms the basis of public and stakeholder consultation on the development of the Croydon Local Plan: Strategic Policies Partial Review in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Council's adopted Statement of Community Involvement 2012. It will also contribute towards compliance with the Duty to Cooperate as required under Section 33A (1) (c) of the Planning and Compulsory Purchase Act 2004.

(Approved by: Sean Murphy: Principal Corporate Solicitor (Regeneration) on behalf of the Acting Council Solicitor and Acting Monitoring Officer.)

### **7. HUMAN RESOURCES IMPACT**

- 7.1 There are no direct Human Resources considerations arising from this report in terms of impact on staff. However, consultation on the Croydon Local Plan: Strategic Policies Partial Review (Proposed Submission) can be undertaken in a proportionate manner with the current Spatial Planning resource level and availability.

Approved by Adrian Prescod, HR Business Partner, for and on behalf of the Director of Human Resources

## **8. EQUALITIES IMPACT**

- 8.1 The Croydon Local Plan: Strategic Policies Partial Review (Proposed Submission) has been subject to an Equality Analysis scoping exercise, which has assessed the draft Plan's impact on equalities and identified that a full Equalities Assessment is necessary for the Proposed Submission stage. The Scoping Report was published on 7 August 2012 and was thereupon subject to a five week consultation. The full Equalities Assessment has established that there is no potential for discrimination, harassment or victimisation and that the Croydon Local Plan: Strategic Policies – Partial Review, includes all appropriate actions to advance equality and foster good relations between groups. The appropriate actions to address potential impacts on groups with a protected characteristic include:
- The Croydon Monitoring Report, which is published annually, to assess the effectiveness of the Croydon Local Plan: Strategic Policies
  - Monitoring of supply and demand for sheltered, residential care housing, and extra care housing.

## **9. ENVIRONMENTAL IMPACT**

- 9.1 A full Sustainability Appraisal (incorporating a Strategic Environmental Assessment) of the Croydon Local Plan: Strategic Policies Partial Review (Proposed Submission) has been prepared. Amendments have been made to the Croydon Local Plan: Strategic Policies Partial Review (Proposed Submission) as a result of the findings of the Sustainability Appraisal.

## **10. CRIME AND DISORDER REDUCTION IMPACT**

- 10.1 The Croydon Local Plan: Strategic Policies Partial Review (Proposed Submission) report does not have a direct impact on the reduction or prevention of crime and disorder.

## **11. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION**

- 11.1 Public and stakeholder engagement is an essential and statutory requirement in preparing the Croydon Local Plan: Strategic Policies Partial Review (Proposed Submission). The Croydon Local Plan: Strategic Policies - Partial Review (Proposed Submission) is considered to be positively prepared, justified, effective and consistent with national policy.

- 11.2 The Proposed Submission is expressed as a series of tracked changes to CLP1 Strategic Policies (2013), and it is only the tracked changed element of CLP1.1 that is being consulted on.
- 11.3 In the absence of the Croydon Local Plan: Strategic Policies Partial Review future planning decisions will be at risk of challenge as there could be the absence of an up to date development plan and possible non-conformity with London Plan policy.
- 11.4 The Housing and Planning Act introduces the ability of the Secretary of State to intervene in a Council's plan making if they don't have an up to date Local Plan by 2017. Progression of the Council's Local Plan keeps plan making in the Council's control.

## **12. OPTIONS CONSIDERED AND REJECTED**

- 12.1 There are no options with regard to consultation, as most of the processes being undertaken are specified by statutory requirements or by government policies. Failure to undertake sufficient evidential analysis or stakeholder consultation may prompt challenge at the Public Examination stage, increasing overall costs and the likelihood of the plan being found unsound.

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## **BACKGROUND PAPERS - LOCAL GOVERNMENT ACT 1972**

- Evidence base for Croydon Local Plan: Strategic Policies Partial Review (Proposed Submission) of the Sustainability Appraisal, and Equality Analysis Report

## **APPENDICES (e-copy only)**

(Available for Cabinet meeting via

<https://secure.croydon.gov.uk/akscroydon/users/public/admin/kabmenu.pl?cmte=CAB>)

Appendix 1 – Draft Croydon Local Plan: Strategic Policies Partial Review (Proposed Submission)

Appendix 2 – Draft Croydon Local Plan (Proposed Submission) Policies Map and Addendum (the Policies Map layers shown on the Addendum supersede the Draft Croydon Local Plan (Proposed Submission) Policies Map and are those to be approved).

Appendix 3 – Consultation Log (including draft Council response to comments) for the Croydon Local Plan: Strategic Policies-Partial Review (Preferred and Alternative Options) consultation November 2015

Appendix 4 – Summary of the main comments received on Croydon Local Plan: Strategic Policies-Partial Review (Preferred and Alternative Options) consultation November 2015 and the Council's response and changes made to Croydon Local Plan: Strategic Policies – Partial Review (Proposed Submission)